



PERDAMAN

E N E R G Y

Performance Audit Report 2024

ERL31

Audit Report	Authorisation	Name	Position	Date
Prepared By		Nicole Davies	Principal Consultant (GES Pty Ltd)	28/2/2024
Reviewed By (licensee)		Shannon Hewitt	General Manager Perdaman Energy	7/03/2025

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GLOSSARY

AEMO	Australian Energy Market Operator
CRM	Customer Relationship Management
CTR	Customer Transfer Request
ERL31	Retail Licence for Perdaman Energy Pty Ltd
ERA	Economic Regulation Authority
ESA	Electricity Supply Agreement
ETAC	Electricity Transfer Access Contract
LUC	Large Use Customer
NMI	National Meter Identifier
NSEC	Non Standard Electricity Contract
MW	Megawatt
PE	Perdaman Energy
SFC	Standard Form Contract
SUC	Small Use Customer
SWIS	South West Interconnected System
VC	Verifiable Consent
VCF	Verifiable Consent Form
WPN	Western Power Networks

This report was prepared by representatives of GES Pty Ltd in relation to the above named client's conformance to the nominated audit standard(s). Audits were undertaken using a sampling process and the report and its recommendations were reflective only of activities and records sighted during this audit process. GES Pty Ltd shall not be liable for loss or damage caused to or actions taken by third parties as a consequence of reliance on the information contained within this report or its accompanying documentation. The client had the opportunity for review to ensure no commercially sensitive information was disclosed.

1. EXECUTIVE SUMMARY

1.1 Auditors Qualified Opinion

We have undertaken a reasonable assurance engagement on Perdaman Energy’s (the Licensee) compliance, in all material respects, with the Electricity Retail Licence (ERL31) (the Licence) and all applicable obligations from the applicable Electricity Compliance Reporting Manual versions released February 2022 to February 2023 (Licence Obligations) (together referred to as the “Licence Conditions”) for the period from 17 March 2022 to 31 March 2024. The assurance engagement was undertaken in accordance with the Economic Regulation Authority’s (ERA) 2019 Audit and Review Guidelines – Electricity and Gas Licences.

In our opinion, based on the procedures we have performed and the evidence we have obtained, except for the effects of the matters described in Basis for Qualified Opinion, Perdaman Energy has complied, in all material respects, with the Licence Conditions for the period from 17 March 2022 to 31 March 2024.

1.2 Basis for Qualified Opinion

For the audit period 17 March 2022 to 31 March 2024 Perdaman Energy’s underwent its first performance audit, and the Licensee demonstrated awareness of its compliance obligations under its electricity retail licence. Non-compliances identified during the audit primarily administrative in nature and resulted from:

- Procedural gaps in documenting contract terms and publishing information.
- Delays in reporting and compliance submissions.
- A reliance on informal, direct communication with its single small-use customer, which mitigated potential risks despite some documentation deficiencies.

While certain Licence Conditions were not fully met, there was no evidence of significant risk to customers. The Licensee engaged proactively with its SUC, ensuring that despite minor administrative gaps, the customer was well-informed and had access to key contractual and billing information. Furthermore, as of the date of this report, Perdaman Energy does not have any active small-use customers, further minimising ongoing risk exposure to retail customers.

However, due to control weaknesses, Perdaman Energy did not fully comply with certain Licence Conditions, as outlined below:

Table 1 - Summary of Non-Compliances Performance Audit 2024

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
85	<i>Electricity Industry (Customer Contracts) Regulations, Reg 11</i>	01/2024: Perdaman Energy’s Commercial Terms comply with Regulation 11(a) by describing the retailer’s right to disconnect supply. However, Regulation 11(b) requires retailers to detail when reconnection must

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
	<p>A non-standard contract must describe the circumstances under which a retailer has the right to disconnect supply and is required to reconnect supply.</p>	<p>occur, including timeframes, conditions, and applicable fees. The current terms only state that Perdaman Energy will "endeavour to ensure" reconnection, which lacks specificity.</p> <p>It is the auditor's opinion that whilst the current control processes were generally adequate improvement was need. As such, to ensure ongoing compliance recommendation 01/2024 was made.</p>
87	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 13</i></p> <p>A non-standard contract must describe the prices payable and the circumstances in which the prices are payable, plus the way the retailer publishes and gives notice of variations to its prices information.</p>	<p>02/2024: Perdaman Energy's non-standard form contract complied with Regulation 13(1) by describing the prices payable and the circumstances in which they were payable. However, it did not comply with Regulation 13(2)(a) and (b), as it did not explicitly state how prices are published or how customers are notified of price variations.</p> <p>It is the auditor's opinion that while Perdaman Energy's internal audit process was in place, it failed to detect this non-compliance, which was also not reported in the 2023 Annual Compliance Report. Although the controls were generally adequate, improvement was needed, as such to ensure ongoing compliance and improved internal controls, recommendation 02/2024 was made.</p>
89Δ	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 15</i></p> <p>A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.</p>	<p>03/2024: Perdaman Energy's Commercial Terms addressed most termination-related matters as required under Regulation 15. However, compliance gaps were identified in the following areas:</p> <ul style="list-style-type: none"> ○ Regulation 15(2)(ca) – The contract did not include provisions allowing termination if the customer consumes more than 160 MWh/year. ○ Regulation 15(3)(d) & (e) – The contract did not specify that the retailer or distributor may remove network equipment after termination, nor that the customer must provide safe and unrestricted access to facilitate this process. <p>It is the auditor's opinion that while Perdaman Energy's existing controls were generally adequate, to ensure ongoing compliance with Regulation 15, recommendation 03/2024 was made.</p>
90Δ	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 16(1A), 16(2) and 34</i></p> <p>A non-standard contract must inform the customer that the provisions of the contract may be amended without the customer's consent where the amendment is required for the contract to remain consistent with a written law. A non-standard contract must describe the process for amending the contract, including requirements for approval and the way in which the amendment will be published.</p>	<p>04/2024: Perdaman Energy did not update its Non-Standard Electricity Contract (NSEC) for small-use customers to comply with Regulations 16(1A) and 34 between 1/1/2023 and 31/3/2024. The NSEC did not include provisions allowing amendments without customer consent when required by law, nor did it outline the amendment process or notification requirements.</p> <p>It is the auditor's opinion that while the Licensee demonstrated an understanding of its compliance obligations, improvements were necessary to ensure contract amendments were properly governed and communicated to customers. To achieve compliance</p>

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
	<p>The non-standard contract must require the retailer to notify the customer of any amendment to the contract.</p>	<p>and strengthen contract governance, recommendation 04/2024 was made.</p>
93	<p>Electricity Industry (Customer Contracts) Regulations, Reg 19</p> <p>A non-standard contract must specify the process that must be taken by the retailer to ensure information held by the retailer is treated confidentially.</p> <p>The customer contract must specify that the retailer has a privacy policy, and the customer can obtain a copy of the policy without charge.</p>	<p>05/2024: Perdaman Energy's Commercial Terms referenced the management of customer information under the <i>Privacy Act 1988</i> (Cth), and its Privacy Policy was available online. However, the Non-Standard Electricity Contract (NSEC) did not fully comply with Regulation 19(2)(a) and (b), as it did not explicitly state that the retailer has a Privacy Policy or that customers can obtain a copy free of charge.</p> <p>It is the auditor's opinion that while privacy protections were in place, contract transparency regarding confidentiality requirements and customer rights needed improvement. To ensure full compliance, recommendation 05/2024 was made.</p>
98A	<p>Electricity Industry (Customer Contracts) Regulations, Reg 34A</p> <p>A non-standard fixed term contract must detail the contract expiry date, customer options available for supply following expiry, the terms and conditions that apply after expiry and the way the retailer will provide the notification in the manner specified.</p>	<p>06/2024: Perdaman Energy's Commercial Terms did not fully comply with Regulation 34 and 34A of the <i>Electricity Industry (Customer Contracts) Regulations 2022</i>, which took effect on 01/01/2023. Specifically, while Clause 34 covered material price adjustments, it did not specify that all contract amendments would be notified. Clause 34A included a renewal notice process, but it did not explicitly outline all required post-expiry options or ensure compliance with the 40 to 20 business day notification window.</p> <p>It is the auditor's opinion that while some processes were in place, there was no structured approach to ensure ongoing compliance with legislative amendments. Additionally, the Licensee did not report a breach of obligation 98A in the 2023 Annual Compliance Report. To ensure compliance and strengthen regulatory controls, recommendation 06/2024 was made.</p>
105	<p>Economic Reg Authority (Licensing Funding) Regs 2014</p> <p>A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.</p>	<p>07/2024: The Licensee confirmed that during the audit period, Perdaman Energy paid the prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in May 2022 relating to standing data charges that was paid 7 days overdue.</p> <p>The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The General Manager confirmed the controls in relation payments, i.e., corporate outlook calendar. The non-compliance was administrative and had not material effect on customers or third parties. As such, no recommendation is made.</p>
124	<p>Retail Licence, condition 4.4.1</p> <p>A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.</p>	<p>08/2024: Perdaman Energy generally complied with its reporting and licence payment obligations; however, three instances of late submissions were identified during the audit period, including:</p>

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
		<ul style="list-style-type: none"> • One late licence fee payment (7 days overdue, refer obligation 105) • One standing data charge submitted past the due date in 2023 • The 2023 Annual Compliance Report was submitted late <p>Additionally, accuracy issues in reporting persisted, with several type 2 reportable obligations omitted from the 2023 Annual Compliance Report. Given the significant legislative changes during the audit period, it is the auditor's opinion that while Perdaman Energy has a corporate outlook calendar in place for compliance tracking, internal controls need further strengthening to ensure timely and accurate reporting.</p> <p>To address these gaps and mitigate future risks of non-compliance, recommendation 08/2024 was made.</p>
133	<p>2022 Code of Conduct, CI 10(2)</p> <p>A retailer or electricity marketing agent must ensure that the information specified in subclause 10(2) is provided to the customer before entering into a non-standard contract.</p>	<p>09/2024: Perdaman Energy provided general information on electricity use and contract terms within the Small-Use Customer Pack and confirmed receipt of required documents via email. However, for the period 20/02/2023 to 31/03/2024, Perdaman Energy did not explicitly provide customers with a summary of the differences between a Standard Form Contract and a Non-Standard Contract, as required under Clause 10(2)(a)(ii).</p> <p>It is the auditor's opinion that while Perdaman Energy had an established process for providing contract documentation, compliance controls should be improved to ensure all required pre-contractual disclosures are explicitly met. As such, recommendation 09/2024 was made.</p>
271D	<p>2022 Code of Conduct, CI 68(1)</p> <p>The retailer must publish on its website the information detailed in subclause 68(1).</p>	<p>10/2024: Perdaman Energy did not fully meet the publication requirements under Clause 68(1) during the audit period, as the retailer failed to publish information about its complaints and dispute resolution procedures and the contact details for the electricity industry ombudsman on its website.</p> <p>It is the auditor's opinion that while the issue was rectified after the audit period, Perdaman Energy should improve controls and internal compliance measures to prevent future non-compliance. Recommendation 10/2024 was made accordingly.</p>
280	<p>2022 Code of Conduct, CI 73</p> <p>At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make payments to the customer under Part 14 or under any other written law, including the amount of the payment and the eligibility criteria for the payment.</p>	<p>11/2024: Perdaman Energy did not meet the requirement to provide customers with written details of its obligations to make service standard payments under Part 14 of the Code during the audit period. No formal process was in place to ensure annual notifications were issued.</p> <p>It was noted, there was no requirement make service standard payments during the audit period. However, it is the auditor's opinion that while the identified issue has been addressed, ongoing monitoring is required to</p>

REF NO,	LICENCE OBLIGATION ¹	SUMMARY OF ISSUE
		ensure compliance. Recommendation 11/2024 was made.
299	2022 Code of Conduct, CI 87(2) - The standard complaints and dispute resolution procedure under subclause 87(1) must comply with the requirements specified in subclauses 87(2)(a), (b), (c) and (d).	<p>12/2024: Perdaman Energy's complaints handling process complied with AS ISO 10002-2014 and addressed most requirements under Clause 87(2). However, gaps were identified in specific compliance obligations, including provision of required information, response times, and methods of response. During the audit period there were no SUC or LUC complaints made.</p> <p>It is the auditor's opinion that while Perdaman Energy had a functional complaints management process, targeted improvements are required to ensure full compliance. Recommendation 12/2024 was made.</p>
302	2018 Code of Conduct, CI 12.2 - A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.	<p>13/2024: During the audit period (17/03/2022 – 20/02/2023), Perdaman Energy did not explicitly distinguish customer complaints from queries in accordance with the ERA's Customer Complaint Guidelines – October 2016.</p> <p>Key findings:</p> <ul style="list-style-type: none"> • The complaints register did not reflect a clear distinction between complaints and queries. • Perdaman Energy maintained regular direct communication with its small-use customer, potentially reducing formal complaint classifications. • The obligation was removed from the Code of Conduct as of 20/02/2023. <p>No further recommendations are required, as Clause 12.2 is no longer applicable. However, compliance with obligation 299 should be maintained to ensure the continued proper categorisation and handling of customer complaints under current regulatory requirements.</p>

¹ The reference number allocated to the licence obligation in the Electricity or Gas Compliance Reporting Manual.

Table 2 - Audit Compliant and Control Rating Scales

Performance Audit Compliance & Controls Rating Scales			
Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-Compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement needed	3	Non-Compliant – moderate impact on customers or third parties

D	No controls evident	4	Non-Compliant – major impact on customers or third parties
NP	Not Performed	NR	Not rated – Determined Not Applicable during the audit period

As required by the Audit Guidelines Section 5.1.6.1, Table 3 lists the number of licence obligations that were given each combination of compliance and controls ratings. The table allows licensees and the ERA to confirm the auditor has rated all relevant licence obligations and provides a simple summary of the licensee’s compliance during the audit period.

Table 3 - Compliance and Controls Ratings Summary Table

		COMPLIANCE RATING					
		1	2	3	4	N/R	TOTAL
CONTROLS RATING	A	1	2	0	0	4	7
	B	0	11	0	0	0	11
	C	0	0	0	0	0	0
	D	0	0	0	0	0	0
	N/P	90	0	0	0	125	215
	TOTAL	91	13	0	0	129	233

Note that, in accordance with the Audit Guidelines:

- Obligations assessed as being “not applicable” to Perdaman Energy’s electricity retail licence activities have not been included within this report.
- A control rating is only provided for those obligations with a Priority 1, 2 or 3 rating, where an obligation is assessed as non-compliant, or where a control improvement opportunity is identified.

1.3 Basis of Audit

This electricity retail licence (**ERL31**) performance audit for Perdaman Energy was conducted to assess the licensee's compliance with the conditions of its licence. The audit procedures were undertaken in alignment with ISO 31000 Risk Management – Guidelines, APES 110 Code of Ethics, ASAE 3000, ASAE 3100, ASA 315, ASA 500, ASA 530 and ASA750 (refer section 3.5).

This performance audit was conducted by the auditor within a reasonable assurance engagement framework, with the intent of providing an objective and professional compliance assessment.

This Performance Audit report is an accurate representation of the auditor's findings and opinions.

Perdaman Energy's Responsibilities for Compliance with the "Licence Conditions"

Perdaman Energy is responsible for:

- a) Compliance with the Licence as evaluated against the conditions within the Licence, for the period 17 March 2022 to 31 March 2024.
- b) Identifying risks that threaten the conditions within the Licence identified above being met.
- c) Identifying suitable compliance requirements as specified by the conditions within the Licence.
- d) Identifying, designing and implementing controls to enable the conditions within the Licence to be met and to monitor ongoing compliance.

Our Independence and Quality Control

We have complied with the independence and other relevant ethical requirements relating to assurance engagements, which is fundamentally based on confidentiality, integrity, objectivity, and independence, skills and competence. We applied quality management system controls as defined by ISO 9001 in undertaking this assurance engagement.

Assurance Practitioner's Responsibilities

Our responsibility is to express an opinion on Perdaman Energy's compliance, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period from 17 March 2022 to 31 March 2024. ASAE 3100 requires that we plan and perform our procedures to obtain reasonable assurance about whether Perdaman Energy has complied, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period from 17 March 2022 to 31 March 2024.

Inherent Limitations

Assurance engagements are subject to inherent limitations, together with the internal control structure, it is possible that misstatement, error or non-compliance with the compliance requirements may occur and not be detected.

A reasonable assurance engagement relating to the current audit period does not indicate compliance for future audit periods.

1.4 Appreciation

The Licensee, Perdaman Energy Pty Ltd (**Perdaman Energy**).

Perdaman Energy is an energy supplier who provides services under an electricity retail licence (**ERL31**) granted by the Economic Regulation Authority. As a holder of an Electricity Retail Licence, Perdaman Energy sells electricity to “contestable” customers in the South West Interconnected System (SWIS). A contestable customer is one who uses more than 50,000 kWh per year of electricity. Perdaman Energy Retail Pty Ltd holds an electricity retail licence (**ERL31**) and operates as an electricity retailer in Western Australia.

As an electricity retailer Perdaman Energy Pty Ltd liaises directly with consumers and ensures that their energy requirements are met. In general, through the use of a Non-Standard Electricity Contract (**NSEC**), the Licensee, supplies electricity to small use (**SUC**) to large use customers (**LUC**) and does not supply electricity to residential customers. The NESC comprises an Electricity Supply Agreement (**ESA**), Commercials Terms and for SUC Perdaman Energy Small Use Customer Pack.

The organisation has an efficient organisational structure with the General Manager directly overseeing compliance, communication with the one small use customer and the engagement of company support resources and where appropriate external expertise to improve compliance processes. During the audit period, as of June 30 annually, Perdaman Energy reported as part of the Electricity Performance Reporting Datasheets, 17 business customers for 2023 (of which 1 was a SUC).

Sections 13 of the Electricity Industry Act 2004 require as a condition of every retail licence that the licensee must, not less than once in every period of 24 months (or any longer period that the Authority allows) calculated from the grant of the licence, provide the Authority with a performance audit report by an independent expert acceptable to the Authority. Geographe Environmental Services (GES) has been approved by the Authority ((ERA Reference: D277795 Dated: 24/6/2024) to undertake the works subject to an audit plan approved by the Authority.

This is Licensee’s first electricity retail licence performance audit to assess the Licensee’s level of compliance with its licence conditions.

2. PERFORMANCE AUDIT

The Licensee has issued a consultancy brief to undertake its first Performance Audit as required by its Electricity Retail Licence (ERL31). The Performance Audit Report is to be provided to the Economic Regulation Authority (ERA/the Authority) to assess the Licensee's level of compliance with the licence conditions. The Performance Audit was conducted in accordance with the 2019 Audit and Review Guidelines – Electricity and Gas Licences (Audit Guidelines).

2.1 Performance Audit Objectives

The objective of this Performance Audit was to assess the effectiveness of systems and processes developed and implemented by Perdaman Energy to achieve the level of compliance as stipulated by its Electricity Retail Licence ERL31. Our qualified audit opinion provides indication that there were specific areas where the Licensee did not comply with the established criteria. This performance audit also intends provide recommendations for corrective action or an assessment of corrective action taken by the Licensee, where necessary.

The Audit Guidelines, section 1.5.1, required that the scope of the audit considered:

- *Process compliance* – the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls.
- *Outcome compliance* – the actual performance against standards prescribed in the licence throughout the audit period.
- *Output compliance* – the existence of the output from systems and procedures throughout the audit period (specifically, proper records which provide assurance that procedures are consistently followed, and controls are maintained).
- *Integrity of reporting* – the completeness and accuracy of the compliance and performance reports provided to the ERA.
- Compliance with any individual licence conditions – the actual performance against the requirements imposed on the specific licensee by the ERA or specific matters raised by the ERA.

As such, the recommendations were made in this performance audit report were directly linked to the specific findings and areas of non-compliance. These recommendations aim to address the root causes of the identified non-compliance issues and to guide the auditee on corrective actions to ensure future compliance and primarily related to enhancing the effectiveness of organisational Control Procedures as well implementing revised internal compliance processes, such as internal audit.

Opportunities for improvement identified that relate to the Performance Audit findings have been provided directly to the Licensee and have not been included in this document as required by the 2019 Audit and Review Guidelines – Electricity and Gas Licences section 5.1.8

As required by the Audit Guidelines (refer section 5.3) the licensee must submit a post-audit implementation plan, with the audit report. The PAIP must be a separate document and must be developed by the Licensee.

2.2 Performance Audit Scope

The Performance Audit is an audit of the effectiveness of measures taken by the licensee to meet the performance criteria specified in the Licence (refer Section 13(2) of the Electricity Act 2004). Performance criteria are defined within Condition 1 of the Licence as:

- The terms and conditions of the Licence
- Any other relevant matter in connection with the applicable legislation that the ERA determines should be part of the Performance Audit.

There was one version of ERL31 applicable to the audit period (version 1 – 17 March 2022 which is valid until expiry 16 March 2037). There were no areas of special focus prescribed by the ERA in relation to Perdaman Energy's Performance Audit.

As specified in the Electricity Compliance Reporting Manual (February 2023), externally imposed criteria under law or directives, as defined by ASAE3100, for Electricity Retail Licences, that supply electricity to small use customers, encompasses the following:

1. the following Legislation:
 - ◆ *Electricity Industry Act 2004: Licence Conditions and Obligations (Appendix 1 - Section 12)*
2. the following Regulations:
 - ◆ *Economic Regulation Authority (Licensing Funding) Regulations 2014; and*
 - ◆ *Electricity Industry (Customer Contracts) Regulations 2005 (Section 11).*
 - ◆ *Including the Electricity Industry (Customer Contracts) Amendment Regulations 2022*
 - ◆ *Electricity Industry (Licence Conditions) Regulations 2005 (Appendix 1 - Section 13)*
3. the following Codes:
 - ◆ *Electricity Industry Customer Transfer Code 2016 (Appendix 1 - Section 9)*
 - ◆ *Code of Conduct for the Supply of Electricity to Small Use Customers 2022 (Section 14).*
 - ◆ *Including the Code of Conduct for the Supply of Electricity to Small Use Customers 2018*
 - ◆ *Electricity Industry (Metering) Code 2012 (Appendix 1 - Section 15)*

4. the following regulatory guidelines and documentation:
 - ◆ 2019 Audit and Review Guidelines: Electricity and Gas Licences (Audit Guidelines)
 - ◆ Electricity Compliance Reporting Manual (refer below for detail of those applicable)
 - ◆ Electricity Compliance Reporting Manual June 2020
 - ◆ Electricity Compliance Reporting Manual February 2022
 - ◆ Electricity Compliance Reporting Manual January 2023
 - ◆ Electricity Compliance Reporting Manual February 2023
 - ◆ Customer Complaint Guidelines - December 2016
 - ◆ Compliance Enforcement Policy 2016
 - ◆ Financial Hardship Policy Guidelines - Electricity Licences
 - ◆ Electricity retail licence performance reporting datasheets
 - ◆ Any relevant regulatory guidance documentation published by the ERA or applicable regulatory authority, such as the Australian Energy Sector Cyber Security Framework (AESCSF)

5. the following enforceable undertakings:
 - ◆ 2023 Audit Plan as developed and approved by the ERA.
 - ◆ 2021 Performance Audit – ERL31

6. the following internally imposed criteria:
 - ◆ Policies
 - ◆ Manuals
 - ◆ Plans
 - ◆ Procedures/Customised Systems
 - ◆ Work Instructions

A full list of the internally imposed criteria that were established by the and provided to the auditor as part of the document review and throughout the audit process Licensee are referenced in appendix 2. Consideration of internally imposed audit criteria has been referenced in the audit findings against each compliance obligation, refer appendix 1.

2.3 Performance Audit Excluded Conditions

There were some Electricity Compliance Reporting Manual obligations for ERL31 from the applicable versions that have been excluded from the audit because they are not applicable to Perdaman Energy. During the audit period Perdaman Energy did not have residential customers or small use customers on life support. All registered life support customers were large use customers. Excluded compliance obligations were detailed in the Audit Plan. Deviations from the Audit Plan are detailed in Section 1.3.

Table 4 - Obligations Excluded from the Audit Report

Electricity Compliance Reporting Manual Section	Obligation Reference	Explanation for Retail Obligations Not Applicable to Licensee
11. Electricity Industry (Customer Contracts) Regulations – Licence conditions and obligations		
<i>Electricity Industry (Customer Contracts) Regulations 2005 and Amendment Regulations 2022</i>	98B+	The Licensee does not have any residential customers.
12. Electricity Industry Act – Licence conditions and obligations		
Retail Licence, condition 4.1.1	107	A licensee has not paid the costs of taking an interest in land or an easement over land.
Retail Licence, condition 6.7.1	110	The Licensee has not been designated under s71(1) of the Electricity Act as the supplier of last resort.
13. Electricity licences – Licence conditions and obligations		
Retail Licence, condition 5.2.4	120	Obligation 120 was inapplicable since Perdaman Energy Retail Pty Ltd was not assigned individual performance standards by the ERA during the audit period.
14. Code of Conduct – Licence conditions and obligations		
<i>Code of Conduct</i>	273A+	Retail obligations only applicable to Synergy/Horizon.
<i>Code of Conduct</i>	136, 147, 193A+, 191-196, 200, 202-204, 204A+, 205-210, 211, 212, 212A+, 213, 213A+, 214, 214A-E+, 215-223, 223A-B+, 225-227 231,275-279, 294-295	The Licensee does not have any residential customers.
<i>Code of Conduct</i>	245-247, 249-271C <i>Note: 257 is Type 1, 248 not applicable to audit period</i>	The Licensee does not have any pre-payment meters.
<i>Code of Conduct</i>	307A-G	Family Violence obligations are not applicable to the Licensee.
15. Electricity Industry Metering Code – Licence conditions and obligations		
<i>Metering Code</i>	401, 405	Obligations only applicable to Network Operator.

* Electricity Compliance Reporting Manual – February 2023

The Retail Licence compliance elements that were included in the scope of this audit are as defined in Table 7 and are further detailed in Appendix 1.

2.4 Performance Audit Variation to Audit Plan

As required by section 5.1.4 of the Audit and Review Guidelines – 2019, the audit report must describe any deviations from the audit plan. Auditors must also identify any licence obligations that were assessed after the approval of the audit plan by the ERA, as 'not applicable'. Licence obligations or effectiveness criteria that have been assessed as 'not applicable' should not be included in the performance summary or observations section of the report. There were no variations made to the audit plan.

2.5 Performance Audit Methodology

As required by the Audit Guidelines (refer section 5.1.2), this audit report must describe the methodology used to execute the audit plan. As such, the performance audit methodology, subject to the variations detailed in section (2.4), is detailed below:

1. **Document Review and Control Procedures Assessment.** We conducted a comprehensive review of control procedures and assessed the control environment. In cases where the Licensee's controls underwent changes or revisions during the audit period, we examined both the former and current controls. This includes a review of applicable versions of documents such as the Electricity Supply Agreement, Commercial Terms and the Small Use Customer Information Pack (Appendix 2).
2. **Site Visit:** The site audit took place at Perdaman Energy's offices on 30 August 2024. No other entity performed functions on behalf of the Licensee that required review. We evaluated various systems implemented by the Licensee to support its electricity retail business operations. There were also several follow up online meetings, telephone discussions and emails in relation the performance audit scope.
3. **Audit Procedures and Evidence:** Audit procedures and evidence collection were specified in the Audit Plan and aligned with the assigned Audit Priority for Licensee obligations. The Audit Priority, the non-compliance and the strength of the Licensee's control environment, (refer Table 7), guided the nature and extent of the applied audit procedures. Professional judgment was exercised to determine the sufficiency of audit evidence. In instances where control environment adequacy was identified as an issue, detailed audit procedures, including increased sampling and process re-evaluation, were performed to assess compliance levels.

Table 5 – Fieldwork, Control Categories and Descriptions

Controls	Description of Controls
Control Environment	The licensee’s management philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology, training and the skills and experience of the relevant staff members.
Information System	The suitability of the licensee’s information systems to record the information needed to comply with the licence, accuracy of data, security of data and documentation describing the information system.
Control Procedures	The presence of systems and procedures to monitor compliance with the licence and to detect or prevent instances of non-compliance or under-performance.
Compliance Attitude	The action taken by the licensee in response to any previous audit or review recommendations, and an assessment of the licensee’s attitude towards compliance.
Outcome Compliance	The actual performance against standards prescribed in the licence throughout the audit or review period.

4. **Audit Methodology Standards and Guidelines:** The Performance Audit was conducted following principles of ISO 9001, ISO 31000 Risk Management Guidelines, APES 110 Code of Ethics, and the following Standards on Assurance Engagement by the Auditing and Assurance Standards Board:

- ASAE 3000 - Assurance Engagements Other than Audits or Reviews of Historical Financial Information
- ASAE 3100 - Compliance Engagements
- Auditing Standard ASA 315 - Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment
- Auditing Standard ASA 500 - Audit Evidence
- Auditing Standard ASA 530 - Audit Sampling
- Auditing Standard ASA 705 – Modifications to the Opinion in the Independent Auditors Report

5. **Timely Compliance:** We evaluated Licensee obligations requiring timely completion of activities, such as responding to customer complaints or providing annual compliance and performance reports to the ERA.

6. **Inadequacies Disclosure:** Identified control inadequacies have been disclosed in the observations section of the report.

7. **Control Ratings:** Control environment and control procedures were rated only for the following:

- Audit priority of 1, 2, or 3 (as assigned)
- Non-compliant Licensee obligations (compliance rating of 2, 3, or 4).

8. **Opportunities for improvement:** Any recommendations for licence obligations, that received a rating other than those in the point 8 above were directly provided to the licensee.

Assistance from the Licensee: The Licensee provided necessary assistance, including access to facilities and business premises, materials, information sources, and relevant personnel as required by Section 4.1 of the Audit Guidelines (2019). The performance audit was conducted by Nicole Davies and required a total of 80 hours of her time.

Table 6 - List of Personnel Who Participated in the Performance Audit

No.	Name	Company	Position Description
1	Shannon Hewitt	Perdaman Energy	General Manager

2.6 Performance Audit Summary of Findings

Table 7 - Performance Audit Compliance Summary

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				Compliance Rating					
			A	B	C	D	NP	1	2	3	4	NR
9. ELECTRICITY INDUSTRY CUSTOMER TRANSFER CODE – LICENCE CONDITIONS AND OBLIGATIONS												
6	Electricity Industry Customer Transfer Code, CI 3.2(2)	4					NP	1				
7	Electricity Industry Customer Transfer Code, CI 3.4(1)	4					NP	1				
8	Electricity Industry Customer Transfer Code, CI 3.5(3)	4					NP					NR
9	Electricity Industry Customer Transfer Code, CI 3.6(2)	4					NP					NR
16	Electricity Industry Customer Transfer Code, CI 3.9(1)	4					NP	1				
17	Electricity Industry Customer Transfer Code, CI 3.9(2)	4					NP					NR
18	Electricity Industry Customer Transfer Code, CI 3.9(3)	4					NP	1				
19	Electricity Industry Customer Transfer Code, CI 3.9(4)	4					NP	1				
23	Electricity Industry Customer Transfer Code, CI 4.2(2)	4					NP	1				
24	Electricity Industry Customer Transfer Code, CI 4.3	4					NP	1				
25	Electricity Industry Customer Transfer Code, CI 4.4(1)	4					NP	1				
26	Electricity Industry Customer Transfer Code, CI 4.4(2)	4					NP					NR
27	Electricity Industry Customer Transfer Code, CI 4.5(1)	4					NP					NR
28	Electricity Industry Customer Transfer Code, CI 4.6(3)	4					NP					NR
29*Δ	Electricity Industry Customer Transfer Code, CI 4.7	4					NP	1				
30	Electricity Industry Customer Transfer Code, CI 4.8(2)	4					NP	1				
34	Electricity Industry Customer Transfer Code, CI 4.9(6)	4					NP	1				
37A.+	Electricity Industry Customer Transfer Code, CI 4.10(4)	4					NP	1				
39	Electricity Industry Customer Transfer Code, CI 4.11(3)	4					NP	1				
40	Electricity Industry Customer Transfer Code, CI 4.12(3)	5					NP					NR
43	Electricity Industry Customer Transfer Code, CI 4.15	5					NP	1				
44	Electricity Industry Customer Transfer Code, CI 4.16	4					NP	1				
45	Electricity Industry Customer Transfer Code, CI 4.17	4					NP	1				
48A.	Electricity Industry Customer Transfer Code, CI 6.1	4					NP	1				
49	Electricity Industry Customer Transfer Code, CI 6.2	4					NP	1				
52	Electricity Industry Customer Transfer Code, CI 6.4(1)	4					NP					NR

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR	
			A	B	C	D		1	2	3	4		
53	Electricity Industry Customer Transfer Code, CI 6.4(2)	4					NP						NR
54	Electricity Industry Customer Transfer Code, CI 6.6	4					NP	1					
55	Electricity Industry Customer Transfer Code, CI 7.1(1)	5					NP						NR
56	Electricity Industry Customer Transfer Code, CI 7.1(2)	5					NP						NR
57	Electricity Industry Customer Transfer Code, CI 7.1(3)	4					NP						NR
58	Electricity Industry Customer Transfer Code, CI 7.2(4)	4					NP						NR
59	Electricity Industry Customer Transfer Code, CI 7.3(2)	5					NP						NR
11. ELECTRICITY INDUSTRY (CUSTOMER CONTRACTS) REGULATIONS – LICENCE CONDITIONS AND OBLIGATIONS													
79	<i>Electricity Industry (Customer Contracts) Regulations, Reg 5</i>	4					NP	1					
80	<i>Electricity Industry (Customer Contracts) Regulations, Reg 6</i>	4					NP	1					
81	<i>Electricity Industry (Customer Contracts) Regulations, Reg 7</i>	4					NP	1					
82	<i>Electricity Industry (Customer Contracts) Regulations, Reg 8</i>	4					NP	1					
83	<i>Electricity Industry (Customer Contracts) Regulations, Reg 9</i>	4					NP	1					
84	<i>Electricity Industry (Customer Contracts) Regulations, Reg 10</i>	4					NP	1					
85	<i>Electricity Industry (Customer Contracts) Regulations, Reg 11</i>	4		B					2				
86	<i>Electricity Industry (Customer Contracts) Regulations, Reg 12</i>	4					NP	1					
86A+*	<i>Electricity Industry (Customer Contracts) Regulations, Reg 12</i>	4					NP						NR
87*	<i>Electricity Industry (Customer Contracts) Regulations, Reg 13</i>	4		B					2				
88	<i>Electricity Industry (Customer Contracts) Regulations, Reg 14</i>	4					NP	1					
89*Δ	<i>Electricity Industry (Customer Contracts) Regulations, Reg 15</i>	4		B					2				
90*Δ	<i>Electricity Industry (Customer Contracts) Regulations, Reg 16(1A), 16(2) and 34</i>	4		B					2				
91	<i>Electricity Industry (Customer Contracts) Regulations, Reg 17</i>	4					NP	1					
92	<i>Electricity Industry (Customer Contracts) Regulations, Reg 18</i>	4					NP	1					
93	<i>Electricity Industry (Customer Contracts) Regulations, Reg 19</i>	4		B					2				
94	<i>Electricity Industry (Customer Contracts) Regulations, Reg 20</i>	4					NP	1					
95	<i>Electricity Industry (Customer Contracts) Regulations, Reg 21</i>	4					NP	1					
96	<i>Electricity Industry (Customer Contracts) Regulations, Reg 32</i>	4					NP	1					
97	<i>Electricity Industry (Customer Contracts) Regulations, Reg 93(2)</i>	4					NP	1					
98	<i>Electricity Industry (Customer Contracts) Regulations, Regs 93(3) and (4)</i>	4					NP	1					

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
98A	<i>Electricity Industry (Customer Contracts) Regulations, Reg 34A</i>	4		B					2			
98C	<i>Electricity Industry (Customer Contracts) Regulations, Reg 34C</i>	4					NP	1				
100	<i>Electricity Industry (Customer Contracts) Regulations, Reg 38</i>	4					NP					NR
12. ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS												
101	Electricity Industry Act, section 13(1)	4					NP	1				
105	Economic Reg Authority (Licensing Funding) Regs 2014	2	A						2			
106	Electricity Industry Act, section 31(3)	5					NP	1				
107	Electricity Industry Act, section 41(6)	4					NP					NR
108	Electricity Industry Act, section 54(1)	4					NP	1				
109	Electricity Industry Act, section 54(2)	4					NP	1				
111	Electricity Industry Act, section 101	4					NP	1				
13. ELECTRICITY LICENCES – LICENCE CONDITIONS AND OBLIGATIONS												
114	Retail Licence, condition 6.3.1	4					NP					NR
116	Retail Licence, condition 6.4.2	5					NP	1				
117	Retail Licence, condition 6.4.3	5					NP	1				
118	Retail Licence, condition 6.5.1	4					NP	1				
119	Retail Licence, condition 4.3.1	4					NP	1				
121	Retail Licence, condition 5.3.2	4					NP					NR
123	Retail Licence, condition 4.4.1	4					NP					NR
124	Retail Licence, condition 4.5.1	2		B					2			
125	Retail Licence, condition 3.8.1 and 3.8.2	4					NP	1				
126	Retail Licence, condition 3.7.1.1	4					NP	1				
14. CODE OF CONDUCT – LICENCE CONDITIONS AND OBLIGATIONS												
MARKETING												
129A	2022 Code of Conduct, CI 8	4					NP					NR
130	2022 Code of Conduct, CI 9(1)	4					NP					NR
131	2022 Code of Conduct, CI 9(2)	4					NP					NR
132	2022 Code of Conduct, CI 10(1)	4					NP	1				
133	2022 Code of Conduct, CI 10(2)	4		B					2			
133A	2022 Code of Conduct, CI 10(3)	4					NP	1				
135	2022 Code of Conduct, CI 10(5)	4					NP	1				
137	2022 Code of Conduct, CI 11(2)	4					NP	1				
138	2022 Code of Conduct, CI 12(1)	4					NP					NR
139	2022 Code of Conduct, CI 12(2)	4					NP	1				

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
140	2022 Code of Conduct, CI 13	4					NP	1				
CONNECTION												
143	2022 Code of Conduct, CI 18(1)	4					NP	1				
144	2022 Code of Conduct, CI 18(2)	4					NP	1				
BILLING												
145	2022 Code of Conduct, CI 19(1)	4					NP	1				
146	2018 Code of Conduct, CI 4.2(1)	4					NP					NR
146A	2022 Code of Conduct, CI 20(1)	4					NP					NR
148	2022 Code of Conduct, CI 20(3)	4					NP					NR
149	2022 Code of Conduct, CI 20(4)	4					NP					NR
150	2022 Code of Conduct, CI 20(5)	4					NP					NR
151	2022 Code of Conduct, CI 20(6)	4					NP					NR
152	2018 Code of Conduct, CI 4.3(1)	4					NP					NR
153	2018 Code of Conduct, CI 4.3(2)	4					NP					NR
154	2018 Code of Conduct, CI 4.4	4					NP	1				
155	2018 Code of Conduct, CI 4.5(1)	4					NP	1				
155A	2022 Code of Conduct, CI 21(1)	4					NP	1				
156	2022 Code of Conduct, CI 21(9)	4					NP					NR
157	2018 Code of Conduct, CI 4.6	4					NP	1				
157A	2022 Code of Conduct, CI 22(1)	4					NP	1				
157B	2022 Code of Conduct, CI 22(2)	4					NP					NR
158	2022 Code of Conduct, CI 22(3)	5					NP	1				
158A	2022 Code of Conduct, CI 22(4)	4					NP	1				
159	2018 Code of Conduct, CI 4.8(1)	4					NP					NR
160	2022 Code of Conduct, CI 23(1)	4					NP	1				
161	2022 Code of Conduct, CI 23(2)	4					NP					NR
162	2018 Code of Conduct, CI 4.9	4					NP	1				
163	2022 Code of Conduct, CI 24(2)	5					NP					NR
164	2018 Code of Conduct, CI 4.11(1)	4					NP					NR
165	2018 Code of Conduct, CI 4.11(2)	4					NP					NR
166	2022 Code of Conduct, CI 25(2)	4					NP					NR
166A	2022 Code of Conduct, CI 25(3)	4					NP					NR
167	2022 Code of Conduct, CI 26(2)	4					NP					NR
168	2018 Code of Conduct, CI 4.14(1)	5					NP					NR
169	2018 Code of Conduct, CI 4.14(2)	4					NP					NR

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
170	2018 Code of Conduct, CI 4.14(3)	4					NP					NR
171	2022 Code of Conduct, CI 27(1)	4					NP					NR
172	2022 Code of Conduct, CI 27(2)(a)	4					NP					NR
173	2022 Code of Conduct, CI 27(2)(b)	4					NP					NR
174	2022 Code of Conduct, CI 27(3)	4					NP					NR
175	2022 Code of Conduct, CI 27(4)	4					NP					NR
175A	2022 Code of Conduct, CI 28(1)	4					NP					NR
175B	2022 Code of Conduct, CI 28(3)	4					NP					NR
176	2022 Code of Conduct, CI 29(1)	4					NP					NR
177	2022 Code of Conduct, CI 30(1)	5					NP					NR
178	2022 Code of Conduct, CI 30(2)	4					NP					NR
179	2022 Code of Conduct, CI 30(3)	5					NP					NR
180	2018 Code of Conduct, CI 4.18(6)	5					NP					NR
181	2022 Code of Conduct, CI 30(6)	5					NP					NR
181A	2022 Code of Conduct, CI 30(7)	5					NP					NR
181B	2022 Code of Conduct, CI 30(8)	5					NP					NR
182	2018 Code of Conduct, CI 4.19(1)	4					NP					NR
183	2018 Code of Conduct, CI 4.19(2)	5					NP					NR
183A	2022 Code of Conduct, CI 31(1)	4					NP					NR
183B	2022 Code of Conduct, CI 31(2)	4					NP					NR
183C	2022 Code of Conduct, CI 31(3)	4					NP					NR
183D	2022 Code of Conduct, CI 31(4)	4					NP					NR
183E	2022 Code of Conduct, CI 31(5)	4					NP					NR
184	2018 Code of Conduct, CI 4.19(3)	4					NP					NR
184A	2022 Code of Conduct, CI 32(1)	4					NP					NR
185	2018 Code of Conduct, CI 4.19(4)	5					NP					NR
186	2018 Code of Conduct, CI 4.19(7)	5					NP					NR
PAYMENT												
187	2022 Code of Conduct, CI 93	4					NP	1				
188	2022 Code of Conduct, CI34(1)	4					NP	1				
189	2018 Code of Conduct, CI 5.3	4					NP					NR
190	2022 Code of Conduct, CI 95(1) to (3)	4					NP					NR
190A	2022 Code of Conduct, CI 95(4) to (6)	4					NP					NR
191A	2022 Code of Conduct, CI 36	4					NP	1				
197	2022 Code of Conduct, CI 38(1)	4					NP					NR

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
198	2022 Code of Conduct, CI 38(2)	4					NP					NR
199	2022 Code of Conduct, CI 38(4)	4					NP					NR
201	2022 Code of Conduct, CI 39(2)	4					NP					NR
201A.	Code of Conduct, clause 56(2)	5					NP					NR
PAYMENT ASSISTANCE												
228	2022 Code of Conduct, CI 47	4					NP					NR
DISCONNECTION												
229	2022 Code of Conduct, CI 48	4					NP					NR
230	2022 Code of Conduct, CI 49(a)	4					NP					NR
232	2022 Code of Conduct, CI 51(2)	4					NP					NR
232A	2022 Code of Conduct, CI 51(4)	4					NP					NR
234	2022 Code of Conduct, CI 52	2	A									NR
235	2018 Code of Conduct, CI 7.7(1)	2	A									NR
236	2018 Code of Conduct, CI 7.7(2)	4					NP					NR
240	2018 Code of Conduct, CI 7.7(6)	4					NP					NR
241	2018 Code of Conduct, CI 7.7(7)	4					NP					NR
RECONNECTION												
242	2022 Code of Conduct, CI 53(2)	4					NP					NR
243	2022 Code of Conduct, CI 53(3)	4					NP					NR
INFORMATION & COMMUNICATION												
271D.	2022 Code of Conduct, CI 68(1)	4		B					2			
271E	2022 Code of Conduct, CI 68(3)	4					NP					NR
271F	2022 Code of Conduct, CI 68(4)	4					NP					NR
272	2018 Code of Conduct, CI 10.1(1)	4					NP	1				
273	2022 Code of Conduct, CI 69	4					NP					NR
274	2018 Code of Conduct, CI 10.1(3)	4					NP					NR
274A	2022 Code of Conduct, CI 71(2)	4					NP	1				
280	2022 Code of Conduct, CI 71(2)	4		B					2			
281	2018 Code of Conduct, CI 10.4	4					NP					NR
282	2022 Code of Conduct, CI 74	4					NP					NR
290	2022 Code of Conduct, CI 77	5					NP	1				
291	2018 Code of Conduct, CI 10.10(1)	4					NP					NR
292	2018 Code of Conduct, CI 10.10(2)	4					NP	1				
297	2022 Code of Conduct, CI 79(2)	4					NP					NR
LIFE SUPPORT EQUIPMENT SCHEME												

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR
			A	B	C	D		1	2	3	4	
297B	2022 Code of Conduct, CI 82(2)	2	A									NR
297C	2022 Code of Conduct, CI 82(3)	4					NP					NR
297D	2022 Code of Conduct, CI 82(5)	2	A									NR
297H	2022 Code of Conduct, CI 85(1)	4					NP					NR
297I	2022 Code of Conduct, CI 85(2)	4					NP					NR
297(J)	2022 Code of Conduct, CI 86(2)	4					NP					NR
297(K)	2022 Code of Conduct, CI 86(3) and (4)	4					NP					NR
297(L)	2022 Code of Conduct, CI 86(6)	4					NP					NR
297(N)	2022 Code of Conduct, CI 86(8)	4					NP					NR
COMPLAINTS & DISPUTE RESOLUTION												
298	2022 Code of Conduct, CI 87(1)	4					NP	1				
299	2022 Code of Conduct, CI 87(2)	4		B					2			
299A	2022 Code of Conduct, CI 87(3)	4					NP	1				
300	2018 Code of Conduct, CI 12.1(3)	4					NP	1				
301	2022 Code of Conduct, CI 88	4					NP					NR
301A	2022 Code of Conduct, CI 89	4					NP					NR
302	2018 Code of Conduct, CI 12.2	4	A						2			
303	2018 Code of Conduct, CI 12.3	4					NP					NR
304	2022 Code of Conduct, CI 90	4					NP	1				
REPORTING												
305	2018 Code of Conduct, CI 13.1	4					NP	1				
306	2018 Code of Conduct, CI 13.2	4					NP	1				
307	2018 Code of Conduct, CI 13.3	4	A					1				
SERVICE STANDARD PAYMENTS												
308	2018 Code of Conduct, CI 14.1(1)	4					NP					NR
308A.	2022 Code of Conduct, CI 94(1)	4					NP					NR
308B.	2022 Code of Conduct, CI 94(2)	4					NP					NR
310	2022 Code of Conduct, CI 95(1)	4					NP					NR
312	2022 Code of Conduct, CI 96	4					NP					NR
315	2022 Code of Conduct, CI 100(1)	4					NP					NR
15 ELECTRICITY INDUSTRY METERING CODE 2012 – LICENCE CONDITIONS AND OBLIGATIONS												
324	Electricity Industry Metering Code, CI 3.3B	4					NP					NR
339	Electricity Industry Metering Code, CI 3.11(3)	4					NP					NR
371	Electricity Industry Metering Code, CI 4.4(1)	5					NP					NR
372	Electricity Industry Metering Code, CI 4.5(1)	5					NP	1				

Ref No*	Retail Licence Obligations	Audit Priority	Controls Rating**				NP	Compliance Rating				NR	
			A	B	C	D		1	2	3	4		
373	Electricity Industry Metering Code, CI 4.5(2)	4					NP	1					
388	Electricity Industry Metering Code, CI 5.4(2)	4					NP	1					
402	Electricity Industry Metering Code, CI 5.17(1)	4					NP	1					
406	Electricity Industry Metering Code, CI 5.19(1)	5					NP	1					
407	Electricity Industry Metering Code, CI 5.19(2)	5					NP	1					
408	Electricity Industry Metering Code, CI 5.19(3)	4					NP						NR
410	Electricity Industry Metering Code, CI 5.19(6)	5					NP	1					
416	Electricity Industry Metering Code, CI 5.21(5)	4					NP	1					
417	Electricity Industry Metering Code, CI 5.21(6)	4					NP	1					
435	Electricity Industry Metering Code, CI 5.27	4					NP						NR
448	Electricity Industry Metering Code, CI 6.1(2)	4					NP	1					
451	Electricity Industry Metering Code, CI 7.2(1)	5					NP	1					
453	Electricity Industry Metering Code, CI 7.2(4)	4					NP						NR
454	Electricity Industry Metering Code, CI 7.2(5)	4					NP						NR
455	Electricity Industry Metering Code, CI 7.5	4					NP	1					
456	Electricity Industry Metering Code, CI 7.6(1)	4					NP	1					
457	Electricity Industry Metering Code, CI 8.1(1)	5					NP						NR
458	Electricity Industry Metering Code, CI 8.1(2)	5					NP						NR
459	Electricity Industry Metering Code, CI 8.1(3)	5					NP						NR
460	Electricity Industry Metering Code, CI 8.1(4)	4					NP						NR
461	Electricity Industry Metering Code, CI 8.3(2)	5					NP						NR

*Obligation No. Electricity Compliance Reporting Manual – February 2023

** Non-Compliance Report submitted during the audit period.

Note: A Controls Rating is mandatory for audit priorities 1, 2, or 3 and a comprehensive report of the audit findings is included in Appendix 1.

2.7 Summary Performance Audit Recommendations & Action Plans

Recommendations made within the report are summarised as detailed below and will be reviewed and included in the post audit implementation plan (if required) by the licensee to ensure compliance with requirements.

Table 8 - A Resolved during the current audit period

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
	Licence obligation reference number ² / Controls and Compliance Rating <i>Legislation</i> / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls		
07/2024	<p>105</p> <p>A 2</p> <p>Economic Reg Authority (Licensing Funding) Regs 2014</p> <p>A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.</p> <p>The Licensee confirmed that during the audit period, Perdaman Energy paid the prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in May 2022 relating to standing data charges that was paid 7 days overdue.</p> <p>The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The General Manager confirmed the controls in relation payments</p>	<p>07/2023: The Licensee confirmed that during the audit period, Perdaman Energy paid the prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in May 2022 relating to standing data charges that was paid 7 days overdue.</p> <p>The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The General Manager confirmed the controls in relation payments, i.e., corporate outlook calendar. The non-compliance was administrative and had not material effect on customers or third parties. As such, no recommendation is made.</p> <p>DATE RESOLVED: Compliance was observed from May 2022.</p>	No further action required.

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	ACTION TAKEN BY THE LICENSEE & DATE RESOLVED	AUDITORS' COMMENTS
13/2024	<p data-bbox="331 309 667 376">Licence obligation reference number² /</p> <p data-bbox="331 389 746 421">Controls and Compliance Rating</p> <p data-bbox="331 434 715 501">Legislation / Section, Clause or Regulation /</p> <p data-bbox="331 515 683 582">Details of Non-Compliance or Inadequacy of Controls</p> <p data-bbox="331 600 379 629">302</p> <p data-bbox="331 642 389 674">A 2</p> <p data-bbox="331 687 719 719">2018 Code of Conduct, CI 12.2</p> <p data-bbox="331 732 756 866">A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.</p> <p data-bbox="331 920 756 1158">During the audit period (17/03/2022 – 20/02/2023), Perdaman Energy did not explicitly distinguish customer complaints from queries in accordance with the ERA's Customer Complaint Guidelines – October 2016.</p> <p data-bbox="331 1171 485 1202">Key findings:</p> <ul data-bbox="331 1216 756 1637" style="list-style-type: none"> <li data-bbox="331 1216 756 1350">• The complaints register did not reflect a clear distinction between complaints and queries. <li data-bbox="331 1364 756 1529">• Perdaman Energy maintained regular direct communication with its small-use customer, potentially reducing formal complaint classifications. <li data-bbox="331 1543 756 1637">• The obligation was removed from the Code of Conduct as of 20/02/2023. 	<p data-bbox="783 600 1166 857">13/2024: While the Licensee did not comply with Clause 12.2 during the audit period, the requirement was removed in the 2022 Code of Conduct amendment, effective 20/02/2023.</p> <p data-bbox="783 875 1166 943">DATE RESOLVED: Compliance was effective from 21/02/2023</p>	No further action required.

Table 9 - B Unresolved During the Current Audit Period

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating <i>Legislation</i> / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
01/2024	<p>85</p> <p>B 2</p> <p><i>Electricity Industry (Customer Contracts) Regulations, Reg 11</i> - A non-standard contract must describe the circumstances under which a retailer has the right to disconnect supply and is required to reconnect supply.</p>	<p>01/2024: Review the Commercial Terms to ensure they describe the circumstances in which the retailer is required to reconnect supply. Addressing issues such as dispute resolution, defined timeframes and reconnection process</p> <p>1 - Review and amend the Commercial Terms to clearly describe the circumstances under which the retailer must reconnect supply after disconnection.</p> <p>2 - Define clear reconnection conditions, including eligibility criteria for reconnection</p> <p>3 - Specify timeframes for reconnection after a customer meets the reconnection conditions</p> <p>4 - Outline the reconnection process, including customer actions, retailer responsibilities, and any fees associated with reconnection.</p> <p>5 - Incorporate dispute resolution procedures related to disconnection and reconnection.</p>	Refer 2024 PAIP
02/2024	<p>87</p> <p>B 2</p> <p><i>Electricity Industry (Customer Contracts) Regulations, Reg 13</i> - A non-standard contract must describe the prices payable and the circumstances in which the prices are payable, plus the way the retailer publishes and gives notice of variations to its prices information.</p>	<p>02/2024: To ensure compliance with Regulation 13 of the Electricity Industry (Customer Contracts) Regulations, the non-standard contracts must be updated to explicitly outline the prices payable, the circumstances in which they are payable, and the retailer's process for publishing and notifying customers of price variations. Specific actions:</p>	Refer 2024 PAIP

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
	<p>Perdaman Energy's non-standard form contract complied with Regulation 13(1) by describing the prices payable and the circumstances in which they were payable. However, it did not comply with Regulation 13(2)(a) and (b), as it did not explicitly state how prices are published or how customers are notified of price variations.</p> <p>It is the auditor's opinion that while Perdaman Energy's internal audit process was in place, it failed to detect this non-compliance, which was also not reported in the 2023 Annual Compliance Report.</p>	<p>1 - Specify how the retailer publishes its prices (e.g., website, public notices, regulatory filings).</p> <p>2 - Specify how the retailer gives notice of price variations (e.g., direct customer notification, email, website updates (if appropriate)).</p> <p>3 - Strengthen internal audit processes to ensure pricing compliance is actively monitored.</p>	
03/2024	<p>89*Δ B 2 Electricity Industry (Customer Contracts) Regulations, Reg 15</p> <p>A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.</p> <p>Perdaman Energy's Commercial Terms addressed most termination-related matters as required under Regulation 15. However, compliance gaps were identified in the following areas:</p> <ul style="list-style-type: none"> ○ Regulation 15(2)(ca) – The contract did not include provisions allowing termination if the customer consumes more than 160 MWh/year. ○ Regulation 15(3)(d) & (e) – The contract did not specify that the retailer or distributor may remove network equipment after termination, nor that the customer must provide safe 	<p>03/2024: To achieve compliance with Regulation 15, the Commercial Terms should be amended to include the missing termination provisions, and the following compliance controls implemented:</p> <p>1 - Amend the contract to include a clause allowing termination if the customer consumes more than 160 MWh/year.</p> <p>2 - Update the contract to explicitly state that the retailer or distributor may remove network equipment after contract termination.</p> <p>3 - Amend the contract to require the customer to allow unrestricted access to remove network equipment</p>	Refer 2024 PAIP

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
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and unrestricted access to facilitate this process.

04/2024	<p>90*Δ B 2 <i>Electricity Industry (Customer Contracts) Regulations, Reg 16(1A), 16(2) and 34</i></p> <p>A non-standard contract must inform the customer that the provisions of the contract may be amended without the customer's consent where the amendment is required for the contract to remain consistent with a written law. A non-standard contract must describe the process for amending the contract, including requirements for approval and the way in which the amendment will be published.</p> <p>The non-standard contract must require the retailer to notify the customer of any amendment to the contract.</p> <p>The Licensee confirmed that for the duration of the audit period the SFC was compliant with regulation 16.</p> <p>Perdaman Energy did not update its Non-Standard Electricity Contract (NSEC) for small-use customers to comply with Regulations 16(1A) and 34 between 1/1/2023 and 31/3/2024. The NSEC did not include provisions allowing amendments without customer consent when required by law, nor did it outline the amendment process or notification requirements.</p>	<p>04/2024: To achieve compliance with Regulations 16(1A) and 34, the non-standard contract should be amended, and the following compliance controls implemented:</p> <ol style="list-style-type: none"> 1 – Amend the non-standard contract to state that provisions may be amended without customer consent if required to align with a written law. 2 – Define the process for amending the contract, including: (a) Approval requirements, (b) How amendments will be published. 3 – Require the retailer to notify customers of any contract amendments 4 – Implement Regulatory Compliance Monitoring to track legal changes and apply them to contracts. 5 – Establish Contract Amendment Controls to ensure proper governance of updates and customer notifications. 6 – Conduct Training & Accountability programs to ensure staff understand amendment and notification requirements. 	Refer 2024 PAIP
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REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
05/2024	<p>93 B 2 Electricity Industry (Customer Contracts) Regulations, Reg 19</p> <p>A non-standard contract must specify the process that must be taken by the retailer to ensure information held by the retailer is treated confidentially.</p> <p>The customer contract must specify that the retailer has a privacy policy, and the customer can obtain a copy of the policy without charge.</p>	<p>7 – Introduce Independent Compliance Oversight (e.g., 2nd party/3rd party audits) to verify contract compliance.</p> <hr/> <p>05/2024: To ensure full compliance with Regulation 19 of the <i>Electricity Industry (Customer Contracts) Regulations</i>, the Commercial Terms and Small Use Customer Pack should be updated to explicitly outline confidentiality requirements and customer rights regarding the retailer's Privacy Policy. Specific actions:</p> <p>1 – Update the Commercial Terms and the Small Use Customer Pack to reflect the requirements of the privacy policy and how the customer can obtain it.</p> <p>2 – Include a clause in the contract specifying that the retailer has a Privacy Policy.</p> <p>3 – Explicitly state in the contract that customers can obtain a copy of the Privacy Policy free of charge.</p>	Refer 2024 PAIP
06/2024	<p>98A B 2 Electricity Industry (Customer Contracts) Regulations, Reg 34A</p> <p>A non-standard fixed term contract must detail the contract expiry date, customer options available for supply following expiry, the terms and conditions that apply after expiry and the way the retailer will provide the notification in the manner specified.</p>	<p>06/2024: The Licensee should amend the Commercial Terms to ensure compliance with the <i>Electricity Industry (Customer Contracts) Regulations</i> and mitigate risks of non-compliance as follows:</p> <p>1 – Notify customers of all amendments (not just price adjustments)</p>	Refer 2024 PAIP

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
		2 – Include all post-expiry details in renewal notices <ul style="list-style-type: none"> (a) The expiry date. (b) Post-expiry supply options. (c) The terms and conditions that will apply post-expiry. (d) The notification method used by the retailer. 3 – Ensure expiry notifications are sent 40 to 20 business days before expiry 4 – Track regulatory changes & update contracts accordingly 5 – Improve compliance reporting for breaches	
08/2024	<p>124 B 2 Retail Licence, condition 4.4.1</p> <p>A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.</p> <p>Perdaman Energy generally complied with its reporting and licence payment obligations; however, three instances of late submissions were identified during the audit period, including:</p> <ul style="list-style-type: none"> • One late licence fee payment (7 days overdue, refer obligation 105) • One standing data charge submitted past the due date in 2023 	<p>08/2024: To ensure ongoing compliance with regulatory requirements, Perdaman Energy must implement a structured process for tracking legislative changes and ensuring accurate and timely reporting. Specifically:</p> <p>1 – Implement a Formal Process for Tracking Legislative Changes</p> <p>2 – Strengthen Compliance Monitoring & Internal Controls</p> <ul style="list-style-type: none"> (a) Internal audit (b) Automation of compliance alerts (c) Pre-submission reviews <p>3 – Review the 2024 Annual Compliance Report and include the omitted non-compliances in the 2025 Annual Compliance Report</p>	Refer 2024 PAIP

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
	<ul style="list-style-type: none"> The 2023 Annual Compliance Report was submitted late <p>Additionally, accuracy issues in reporting persisted, with several type 2 reportable obligations omitted from the 2023 Annual Compliance Report. Given the significant legislative changes during the audit period, it is the auditor's opinion that while Perdaman Energy has a corporate outlook calendar in place for compliance tracking, internal controls need further strengthening to ensure timely and accurate reporting.</p>		
09/2024	<p>133 B 2 2022 Code of Conduct, CI 10(2)</p> <p>A retailer or electricity marketing agent must ensure that the information specified in subclause 10(2) is provided to the customer before entering into a non-standard contract.</p> <p>Perdaman Energy provided general information on electricity use and contract terms within the Small-Use Customer Pack and confirmed receipt of required documents via email. However, for the period 20/02/2023 to 31/03/2024, Perdaman Energy did not explicitly provide customers with a summary of the differences between a Standard Form Contract and a Non-Standard Contract, as required under Clause 10(2)(a)(ii).</p>	<p>09/2024: To ensure compliance with the Code of Conduct for the Supply of Electricity to Small-Use Customers 2022 clause 10(2)(a)(ii) the Licensee must update its documentation to require that before entering into a non-standard contract, the retailer must provide customers with specific information:</p> <p>1 - Update the Small-Use Customer Pack to include a clear summary of the differences between Standard and Non-Standard contracts.</p>	Refer 2024 PAIP
10/2024	<p>271D B 2</p>	It was noted the relevant people within Perdaman Energy have	Refer 2024 PAIP

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
	<p>2022 Code of Conduct, CI 68(1)</p> <p>The retailer must publish on its website the information detailed in subclause 68(1).</p> <p>Perdaman Energy did not fully meet the publication requirements under Clause 68(1) during the audit period, as the retailer failed to publish information about its complaints and dispute resolution procedures and the contact details for the electricity industry ombudsman on its website.</p>	<p>been notified, and the missing information was published on the retailer's website on 13/09/2024. To ensure ongoing compliance the Licensee should:</p> <p>1 – Establish effective internal audit process to ensure ongoing compliance.</p> <p>2 – Report the non-compliance in the 2025 Annual Compliance report.</p>	
11/2024	<p>280 B 2 2022 Code of Conduct, CI 73</p> <p>At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make payments to the customer under Part 14 or under any other written law, including the amount of the payment and the eligibility criteria for the payment.</p> <p>Perdaman Energy did not meet the requirement to provide customers with written details of its obligations to make service standard payments under Part 14 of the Code during the audit period. No formal process was in place to ensure annual notifications were issued.</p> <p>It was noted, there was no requirement make service standard payments during the audit period.</p>	<p>11/2024: To ensure compliance with this requirement, the Licensee should:</p> <p>1 – Implement a process to ensure annual written notification is provided to customers regarding service standard payments, including the amount of the payment and eligibility criteria.</p> <p>It was noted that although outside the audit period, the Licensee has captured this action in their Audit Register, to ensure notification will be sent to customers with their Welcome Pack and renewal offer and will also be included in their July invoice each year, aligning with other key notices (e.g., CPI increase, Western Power tariff updates)</p> <p>2 – Ensure the non-compliance is reported in the 2025 Annual Compliance Report</p>	Refer 2024 PAIP

REFERENCE (No./Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT Licence obligation reference number ² / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls	AUDITORS' RECOMMENDATION	ACTION TAKEN BY THE LICENSEE BY END OF AUDIT PERIOD
12/2024	<p>299 B 2 2022 Code of Conduct, CI 87(2) - The standard complaints and dispute resolution procedure under subclause 87(1) must comply with the requirements specified in subclauses 87(2)(a), (b), (c) and (d).</p> <p>Perdaman Energy's complaints handling process complied with AS ISO 10002-2014 and addressed most requirements under Clause 87(2). However, gaps were identified in specific compliance obligations, including provision of required information, response times, and methods of response. During the audit period there were no SUC or LUC complaints made.</p>	<p>12/2024: Review and update the complaints handling policy to explicitly meet all requirements under Clause 87(2), ensuring it includes:</p> <ol style="list-style-type: none"> 1 – Review the complaints process to ensure the information that will be provided to a customer, including in accordance with the requirements under clause 89. 2 – Review the complaints process to ensure response times for complaints are addressed. 3 – Review the complaints process to ensure the method of response is addressed. 4 – Review the definition of a complaint as detailed in the S3.2 Distinguishing 'complaints' from 'queries' of the Customer Complaint Guidelines – October 2016 approved by the ERA to ensure the Complaints Handling Procedure complies. 5 – Ensure the non-compliance is reported in the 2025 Annual Compliance Report 	Refer 2024 PAIP

²The reference number allocated to the licence obligation in the Electricity or Gas Compliance Reporting Manual.

3. STATUS OF RECOMMENDATIONS FROM THE PREVIOUS PERFORMANCE AUDIT

This was the first performance audit for the Licensee, as such there was no previous audit period applicable and no non-compliances. As required by the Audit Guidelines, the current status of the previous audit recommendations is shown in Table 10.

Table 10 - Status of Recommendations for Non-Compliances from the Previous Audit

A Non-Compliance Resolved During Current Audit Period			
REF (No./ Year)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	AUDITORS' RECOMMENDATION	DATE RESOLVED/ DETAILS OF FURTHER ACTION REQUIRED
	Licence obligation reference number ¹ / Controls and Compliance Rating Legislation / Clause / Details of Non-Compliance or Inadequacy of Controls		

Not Applicable – this is the 1st performance audit for ERL31

B Non-Compliance Unresolved During Current Audit Period			
REFER ENCE (No./Ye ar)	NON-COMPLIANCE / CONTROLS IMPROVEMENT	AUDITORS' RECOMMENDATION	FURTHER ACTION REQUIRED DETAILS OF FURTHER ACTION REQUIRED
	Licence obligation reference number ¹ / Controls and Compliance Rating Legislation / Section, Clause or Regulation / Details of Non-Compliance or Inadequacy of Controls		

Not Applicable – this is the 1st performance audit for ERL31

¹ Refers to electricity retail licence obligation in the Electricity Compliance Reporting Manual 2022

APPENDIX 1- PERDAMAN ENERGY PERFORMANCE AUDIT

NOVEMBER 2024

Table 11 - Performance Audit Findings

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
9 ELECTRICITY INDUSTRY CUSTOMER TRANSFER CODE – LICENCE CONDITIONS AND OBLIGATIONS				
6 Type [2]	Electricity Industry Customer Transfer Code, CI 3.2(2) - A retailer must submit a separate data request for each connection point, unless otherwise agreed.		FINDING: The Licensee confirmed during the audit period, the Western Power Web Portal inherently enforced the requirement by permitting only one NMI per data request. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack • Customer Data Requests – Procedure PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Compliance was inherent in the Western Power Web Portal (Web Portal) design. • The Licensee confirmed there was no necessity for an alternative agreement between Western Power and Perdaman Energy to bypass the separate data request for each connection point requirement. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
7 Type [2]	Electricity Industry Customer Transfer Code, CI 3.4(1) - A retailer must submit a data request electronically and must not submit more than a prescribed number of standing or historical data requests in a business day, unless otherwise agreed.		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy submitted data requests electronically and there was no requirement to submit more than the 100 data requests per day limit, for standing data and historical consumption data.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack • Customer Data Requests – Procedure • Customer Folder • Perdaman Energy Letter of Authority V4011 • Sample VCF [HFM] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Nil 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
8 Type [2]	Electricity Industry Customer Transfer Code, CI 3.5(3) - A retailer must withdraw a request for historical consumption data if the contestable customer's verifiable consent ceases to apply before the network operator provides the historical consumption data.		<p>FINDING: The Licensee confirmed during the audit period there were no instances where a customer's verifiable consent ceased to apply or was withdrawn by the customers before Western Power provided the historical consumption data.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Customer Data Requests – Procedure • Customer Folder • Perdaman Energy Letter of Authority V4011 • Sample VCF [HFM] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Nil 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
9 Type [2]	Electricity Industry Customer Transfer Code, CI 3.6(2) - A retailer must pay any reasonable costs incurred by the network operator for work performed in relation to a request for historical consumption data that has been subsequently withdrawn.		<p>FINDING: The Licensee confirmed that during the audit period, there were no withdrawn requests and as such no payments were made to WPN for work performed in relation to a request for historical consumption data.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The WP Web Portal recorded electronic notification to Western Power whether or not a Licensee withdrew a request for historical consumption data during the audit period. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
16 Type [2]	Electricity Industry Customer Transfer Code, CI 3.9(1) - A retailer may only use data relating to a contestable customer to provide that customer with a quotation for the supply of electricity by the retailer; or to initiate a transfer of that customer.		<p>FINDING: The Licensee confirmed during the audit period, Perdaman Energy only used data relating to a contestable customer for the purpose of offering electricity supply quotes or facilitating the customer's transfer.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Customer Data Requests – Procedure • Perdaman Energy Letter of Authority V4011 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	• NA
	2024 - NIL			
17 Type [2]	Electricity Industry Customer Transfer Code, CI 3.9(2) - A retailer must not aggregate a contestable customer's historical consumption data with that of other contestable customers for the purposes of internal business development, if requested not to do so by the customer.			<p>FINDING: The Licensee confirmed during the audit period, there were no customers who requested that their historical consumption data not be aggregated for internal business development.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Customer Data Requests – Procedure • Perdaman Energy Letter of Authority V4011 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • As this was not normal business practice, no formal Control Procedures were developed in relation to aggregation of a contestable customer's historical consumption data. • It was noted that the Licensee was a small organisation and awareness to compliance with requirement was confirmed.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
18 Type [2]	Electricity Industry Customer Transfer Code, CI 3.9(3) - A retailer must not disclose a contestable customer's data to any other person without the verifiable consent of the contestable customer, except in the circumstances defined.		<p>FINDING: The Licensee confirmed during the audit period, no contestable customer data has been provided to any other person without written consent, other than those defined in 3.9(3)(a)(i).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Customer Data Requests – Procedure • Perdaman Energy Letter of Authority V4011 • Privacy Policy V3011 • Perdaman Energy Website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's Privacy Policy was available on their website 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
19 Type [2]	Electricity Industry Customer Transfer Code, CI 3.9(4) - A retailer must keep a copy of the verifiable consent received from a contestable customer for two years.		<p>FINDING: The Licensee confirmed during the audit period, upon receiving verifiable consent from a contestable customer, Perdaman Energy's policies and procedures obligated them to retain this consent on record for a period of two years. This retention policy applied to consent related to the Licensee's request for the customer's historical consumption data and any subsequent disclosure of this data to third parties, as per clause 3.9(3).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Customer Data Requests – Procedure • Perdaman Energy Letter of Authority V4011 • Privacy Policy V3011 • Sample VCF • Perdaman Energy Website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's Control Procedures confirmed that electronic copies of VCF's were maintained indefinitely. There were external drives for data security. The retention policy was not to delete any information. 	
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	<ul style="list-style-type: none"> • The Licensee confirmed awareness to the requirements in relation to verifiable consent.
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
23 Type [2]	Electricity Industry Customer Transfer Code, CI 4.2(2) - A retailer must submit a separate customer transfer request for each connection point, unless otherwise agreed.		<p>FINDING: The Licensee confirmed that during the audit period, Customer Transfer Requests (CTRs) were facilitated exclusively via the Western Power (WP) Web Portal. The portal’s design inherently enforced compliance with Clause 4.2(2) by restricting CTRs to single requests per connection point. The portal did not allow the submission of transfer requests for multiple NMIs in a single request. The Licensee also confirmed there was no necessity for an alternative agreement with Western Power to bypass this requirement.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Build Pack - Customer Transfer and Standing Data Procedure • WP Web Portal • Customer Transfer Requests – Procedure • WP Web Portal Export - CTR Requests <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee confirmed there was no necessity for an alternative agreement between WP and Perdaman Energy to bypass the separate customer transfer request for each connection point requirement. 	
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
24 Type [2]	Electricity Industry Customer Transfer Code, CI 4.3 - A retailer's reason for a transfer must be specified in the customer transfer request form as either to transfer a contestable customer to the retailer that submitted the customer transfer request or to reverse an erroneous transfer.		<p>FINDING: The Licensee confirmed compliance with Clause 4.3 during the audit period, as the Western Power (WP) Web Portal inherently enforced the requirement through its design. All Customer Transfer Requests (CTRs) were conducted via the portal, which mandates that one of the transfer reasons, "Erroneous Transfer" or "New Customer Transfer," be selected as a condition for submission. This ensured adherence to Clause 4.3.</p> <p>The Customer Transfer Requests - Procedure aligned with the Western Power Web Portal's functionality, specifying that valid transfer reasons must be provided for every request. A review of this document, along with CTR logs, confirmed that the procedure was consistent with portal design and regulatory requirements.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack • WP Web Portal Export – CTR Requests • Customer Transfer Requests - Procedure • Customer Transfer and Standing Data Procedure (as outlined in WP Build Pack) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Western Australian Electricity Market Build Pack, specifically the Customer Transfer and Standing Data Procedure, specifies the required reasons for transfer. • A review of CTR exports from the WP Web Portal confirmed that all transfers included a valid reason. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
25 Type [2]	Electricity Industry Customer Transfer Code, Cl 4.4(1) - A retailer may only submit a customer transfer request if it has an access contract for the network unless it is to reverse an erroneous transfer.		<p>FINDING: The Licensee confirmed compliance with Clause 4.4(1) during the audit period. Customer Transfer Requests (CTRs) were facilitated through the Western Power Web Portal, which requires validation of an Electricity Transfer Access Contract (ETAC) before allowing a retailer to initiate a transfer. This system restriction ensures that only retailers with an active ETAC can submit new customer transfer requests.</p> <p>A review of the Western Power ETAC document confirmed the contractual obligation for retailers to have an active access contract before submitting CTRs. Additionally, internal procedures and system audit logs indicate that Perdaman Energy follows this requirement.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Build Pack - Customer Transfer and Standing Data Procedure • WP Web Portal • Customer Transfer Requests – Procedure • WP Web Portal Export - CTR Requests • ETAC Perdaman Energy [Signed 5 May 2022] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The WP Web Portal enforces this restriction by preventing retailers without an active ETAC from processing CTRs. • A review of CTR logs confirmed that all transfers initiated by Perdaman Energy during the audit period complied with Clause 4.4(1). • No instances of non-compliant CTR submissions were identified. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
26 Type [2]	Electricity Industry Customer Transfer Code, CI 4.4(2) - A retailer that submits a customer transfer request to reverse an erroneous transfer must ensure the transfer was made in error and, if it is an incoming retailer, confirm the identity of the previous retailer.		<p>FINDING: The Licensee confirmed that during the audit period there were no instances where the Licensee submitted a CTR to reverse an erroneous transfer.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Portal Erroneous CTRs <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The process to confirm the identity of the incoming retailer is managed by WPN through the Web Portal via a customer transfer notification (CTN). It was understood that a notice of Erroneous Transfer informs Western Power to restore the customer to its original retailer. • It was noted that the Licensee had not yet developed a control procedure during the current audit period. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
27 Type [2]	Electricity Industry Customer Transfer Code, CI 4.5(1) - A retailer must submit a customer transfer request electronically and must not submit more than a prescribed number of customer transfer requests in a business day or with the same nominated transfer date, unless otherwise agreed.		<p>FINDING: The Licensee confirmed that during the audit period:</p> <ul style="list-style-type: none"> ○ All Customer Transfer Requests (CTRs) were submitted electronically via the Western Power Web Portal. ○ No instances of exceeding the prescribed daily CTR limit (20 per business day or 20 on the same nominated transfer date) were recorded. <p>Compliance was inherent in the Web Portal design as it constrained the number of transfers to less than the prescribed number. The portal limits customer transfers to the prescribed limit of 20, which limit also applies to transfers with the same nominated transfer date.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Web Portal Export - CTR Requests • WP Build Pack - Customer Transfer and Standing Data Procedure <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No specific control documentation was developed to monitor or manage potential breaches of the prescribed submission limits. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
28 Type [2]	Electricity Industry Customer Transfer Code, CI 4.6(3) - A retailer must withdraw a customer transfer request if the contestable customer's verifiable consent ceases to apply before the transfer occurs.		<p>FINDING: The Licensee confirmed that during the audit period, no CTRs were withdrawn because verifiable consent ceased to apply. Customer Transfer Requests were only submitted after a contract and Commercial Terms were signed, witnessed, and countersigned.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Web Portal Export - CTR Requests • Customer Transfer Requests – Procedure • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee has developed control procedures for the CTR process. • Sample of ESA's and transfer dates were reviewed. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
29 Type [2]	Electricity Industry Customer Transfer Code, CI 4.7 - A retailer must nominate a transfer date in a customer transfer request in accordance with specified timeframes, except if the customer transfer request is to reverse an erroneous transfer.		<p>FINDING: The Licensee confirmed that during the audit period, the requirements in relation to the nominated transfer dates were met. A review of all customer transfers and the Compliance Breach Register indicated that there were no CTRs rejected due to "Transfer Date" non-compliances for the period 17/03/2022 to 31/03/2024.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Customer Transfer Requests – Procedure • WP Web Portal 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • WP Web Portal Export - CTR Requests • PE Audit Registrar <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that the control procedure detailed the specified timeframes.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
30 Type [2]	Electricity Industry Customer Transfer Code, CI 4.8(2) - A retailer must pay any reasonable costs incurred by a network operator for providing and/or installing a meter if a customer transfer request is withdrawn.		<p>FINDING: During the audit period the Licensee confirmed, Perdaman Energy was not required to pay costs incurred by Western Power, as the network operator, for providing and/or installing a meter including if a CTR was withdrawn.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Web Portal Export - CTR Requests • Customer Transfer Requests – Procedure <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was understood the licensee tracks WP costs incurred.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
34 Type [2]	Electricity Industry Customer Transfer Code, CI 4.9(6) - A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.		<p>FINDING: The Licensee confirmed that during the audit period, on the occasions where Western Power and the Perdaman Energy had to agree to a revised nominated transfer date, the parties made reasonable endeavours to resolve with the Licensee any potential grounds for objection prior to objecting to the CTR, as such an agreement for a revised nominated transfer date was achieved.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • Customer Transfer Requests – Procedure • ETAC Perdaman Energy [Signed 5/5/22] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All objections by Western Power communicated through the web portal notifications, were readily resolved during the audit period. • The Licensee detailed the process for communication between both parties to agree to a revised nominated transfer date. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
37A.+ Type [2]	Electricity Industry Customer Transfer Code, CI 4.10(4) - If a current retailer receives a notice under clause 4.10(1)(a) or 4.10(2)(c) in circumstances where clause 4.12(1)(a)(ii) applies, then the current retailer must promptly forward the notice to the other person referred to in clause 4.12(1)(a)(ii).		<p>FINDING: The Licensee confirmed that during the audit period, in relation to Western Power's obligations following receipt of a valid CTR, Perdaman Energy and Western Power agreed to revise the nominated transfer dates in the certain circumstances specified.</p> <p>DOCUMENTS/SYSTEMS:</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • WP Web Portal • Customer Transfer Requests – Procedure • CRM • ETAC Perdaman Energy [Signed 5/5/22] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Communication processes established electronically through the Web Portal and email communication with Western Power.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
39 Type [2]	Electricity Industry Customer Transfer Code, CI 4.11(3) - A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.		<p>FINDING: The Licensee confirmed that during the audit period, accepted all Western Power's reasonable endeavours to set a new nominated transfer date which was as close as practicable to the original nominated transfer date.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Customer Transfer Requests – Procedure • WP Web Portal • CRM • ETAC Perdaman Energy [Signed 5/5/22] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Actual values were obtained for all meters before the nominated transfer date occurred.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
40 Type [NR]	Electricity Industry Customer Transfer Code, CI 4.12(3) - The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.		<p>FINDING: The Licensee confirmed that during the audit period, Western Power had a valid ETAC with Perdaman Energy. There were no requirements to renegotiate any amendments.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> ETAC Perdaman Energy [Signed 5/5/22] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> ETAC provided a contractual foundation for requiring amendments after a customer transfer. No evidence of disputes or amendments related to Clause 4.12(3) were found during the audit period.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
43 Type [NR]	Electricity Industry Customer Transfer Code, CI 4.15 - In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and, if applicable, AEMO) must act in good faith to ensure that the affected contestable customer has the same rights and obligations as if the erroneous transfer had not occurred.		<p>FINDING: The Licensee confirmed that during the audit period, there was no requirement to rectify an erroneous transfer. As such, no assessment could be undertaken to establish if all interested parties acted in good faith to ensure that the affected contestable customer had the same rights and obligations as if the erroneous transfer had not occurred.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Web Portal Export - All Erroneous CTRs <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • An export from the Web Portal of all erroneous transfers was provided for review.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
44 Type [2]	Electricity Industry Customer Transfer Code, CI 4.16 - A verifiable consent given by a contestable customer in relation to the lodgement of a customer transfer request must be retained by the incoming retailer for two years, except in the case of a customer transfer request to reverse an erroneous transfer.		<p>FINDING: The Licensee confirmed that during the audit period, control procedures confirmed that electronic copies of verifiable consent were maintained for the required 2-year period.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Customer Transfer Requests – Procedure • Perdaman Energy - Electricity Supply Agreement • Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that the verifiable consent given by a contestable customer for a CTR was evident as the customers signed ESA. • There were external drives for data security. The retention policy was understood to be to not to delete any information.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2024 - NIL		
45 Type [2]	Electricity Industry Customer Transfer Code, CI 4.17 - A previous retailer must not bill a contestable customer for charges incurred after the transfer time, except in the case of an erroneous transfer.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where customers were billed for charges after the transfer date.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • ETAC Perdaman Energy [Signed 5/5/22] • CRM • Complaints Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was understood there were no instances where an erroneous transfer required Perdaman Energy as the previous retailer to bill a contestable customer for charges incurred after the transfer time • Invoicing was based on meter data provided through the Web Portal. Protocols related to the Web Portal would result in meter data not being available for the licensee to bill a customer after the transfer time.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
48A. Type [2]	Electricity Industry Customer Transfer Code, Cl 6.1 - All notices must be in writing and delivered as described in subclauses 6.1(a)-(c).		<p>FINDING: The Licensee confirmed that during the audit period, in all instances where communication with Western Power was intended to be a recognised as a valid notice, then the notice or other communication of information was via means as described in subclauses 6.1(a)-(c).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack • ETAC Perdaman Energy [Signed 5/5/22] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • General queries and communication with Western Power Liaison contact routinely via email or telephone. • It was noted the Customer Transfer Code defined notice as a notice or other communication in writing under Part 6 and included a data request or a CTR. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL.			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
49 Type [2]	Electricity Industry Customer Transfer Code, CI 6.2 - A licensee's notice in relation to a data request or customer transfer request must identify the connection point to which it relates.		<p>FINDING: The Licensee confirmed that during the audit period, notices in relation to a data request or customer transfer request identified the connection point.</p> <p>All transfers and data transactions were done electronically via the Web Portal which used the National Meter Identifier or NMI as a distinct and universal identifier or code for each connection point in the electricity market.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack • ETAC Perdaman Energy [Signed 5/5/22] • Customer Transfer Requests – Procedure <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The NMI was noted in the Build Pack procedures specified NMI as a mandatory field and included validation processes to ensure the correct NMI was referenced (i.e. NMI and NMI checksum) 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
52 Type [2]	Electricity Industry Customer Transfer Code, CI 6.4(1) - A retailer must notify its contact details to a network operator within three business days of a request.		FINDING: The Licensee confirmed that during the audit period, confirmed that during the audit period the Western Power did not make a request for the Perdaman Energy to notify its contact details. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • WP Web Portal • ETAC Perdaman Energy [Signed 5/5/22] • CRM PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • The ETAC was valid during the audit period and contact details were included. • The Licensee has established a CRM spreadsheet for communications. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
53 Type [2]	Electricity Industry Customer Transfer Code, CI 6.4(2) - A retailer must notify the network operator of any change in its contact details at least three business days before the change takes effect.		FINDING: The Licensee confirmed that during the audit period, there were no changes to Perdaman Energy's contact details. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Internal Audit Findings to 31 Mar 24 • WP Web Portal PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2024 - NIL		
54 Type [2]	Electricity Industry Customer Transfer Code, CI 6.6 - A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with the communication rules.		<p>FINDING: The Licensee confirmed that during the audit period, use of the Western Power portal meets the requirements of the communication rules.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • WP Build Pack • ETAC Perdaman Energy [Signed 5/5/22] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All transfers and data transactions were done electronically via the portal. Other communications are by email to the correct addresses.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
55 Type [NR]	Electricity Industry Customer Transfer Code, CI 7.1(1) - For a dispute in respect of a matter under, or in connection with, the Electricity Industry Customer Transfer Code, the disputing parties must meet, within five business days of a request by one of those parties and attempt to resolve the dispute through negotiations that are conducted in good faith.		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy did not engage in dispute with regards to the Customer Transfer Code.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal • ETAC Perdaman Energy [Signed 5/5/22] • Internal Audit Findings to 31 Mar 24 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR	OBSERVATIONS: • Dispute resolution processes were defined in the ETAC and the Customer Transfer Code.
	2024 - NIL			
56 Type [NR]	Electricity Industry Customer Transfer Code, CI 7.1(2) - If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute through negotiations that are conducted in good faith.			FINDING: The Licensee confirmed that during the audit period, Perdaman Energy did not engage in dispute with regards to the Customer Transfer Code. DOCUMENTS/SYSTEMS: • WP Web Portal • ETAC Perdaman Energy [Signed 5/5/22] • Internal Audit Findings to 31 Mar 24 PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • The Licensee has established internal review processes for compliance.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
57 Type [2]	Electricity Industry Customer Transfer Code, CI 7.1(3) - If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy did not engage in dispute with regards to the Customer Transfer Code. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • WP Web Portal • ETAC Perdaman Energy [Signed 5/5/22] • Internal Audit Findings to 31 Mar 24 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
58 ^Δ Type [2]	Electricity Industry Customer Transfer Code, CI 7.2(4) - A disputing party that refers a dispute to the arbitrator must provide the arbitrator with prescribed details of the nature of the dispute.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy did not engage in dispute with regards to the Customer Transfer Code. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • WP Web Portal • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
59 Type [NR]	Electricity Industry Customer Transfer Code, CI 7.3(2) - A disputing party must, at all times, conduct itself in a manner that is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy did not engage in dispute with regards to the Customer Transfer Code. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • WP Web Portal • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
11. ELECTRICITY INDUSTRY (CUSTOMER CONTRACTS) REGULATIONS – LICENCE CONDITIONS AND OBLIGATIONS				
79 Type [2]	Electricity Industry (Customer Contracts) Regulations, Reg 5 - A non-standard contract must be in a format that is easy to read and expressed in clear, simple and concise language.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy used a ESA Contract (Electricity Supply Agreement for Small Use Customers), which comprised the Commercial Terms and a Non-Standard Electricity Contract (NSEC) during the audit period. The Commercial Terms & NSEC were expressed in clear, simple, and concise language. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 PERSONNEL INTERVIEWED:	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> All versions of the Commercial Terms and NSEC during the audit period were reviewed for compliance. It was noted there were no customer complaints regards ESAs during the audit period. The Commercial Terms used italics to highlight all terms defined in the list of definitions. The use of italics improved emphasis of key terms for the reader The Perdaman Energy Small-Use Customer Pack further highlighted key information for the customer such as the cooling off period, complaints process and contacts in case of fault or emergency.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
80 Type [2]	<i>Electricity Industry (Customer Contracts) Regulations, Reg 6 - A non-standard contract must specify when it comes into effect and the period for which it has effect.</i>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's -ESA specified the commencement date and the minimum supply period.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Perdaman Energy Commercial Terms for Electricity Supply – V2061 Perdaman Energy - Electricity Supply Agreement Perdaman Energy Small-Use Customer Pack V2021 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer to section 3.1 & 3.3 of the Commercial Terms
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
81 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 7 - A non-standard contract must specify certain information about the retailer.</i></p>		<p>FINDING: The Licensee confirmed that during the audit period, the Commercial Terms contained the following information as required:</p> <ul style="list-style-type: none"> (a) company name and business name; (b) Australian Business Number; (c) registered office address and business address; (d) postal address; (e) telephone number; (f) email address; and (g) internet website address. <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy Small-Use Customer Pack V2021 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee confirmed that there was only one version of the Commercial Terms applicable during the audit period were reviewed. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
82 Type [2]	<i>Electricity Industry (Customer Contracts) Regulations, Reg 8 - A non-standard contract must give an exact description of the goods and services that the retailer will provide under the contract.</i>		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms detailed an exact description of goods and services that the Licensee provided under the contract. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Refer section 11.1 & 11.2 Commercial Terms 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
83 Type [2]	<i>Electricity Industry (Customer Contracts) Regulations, Reg 9 - A non-standard contract must require the customer to pay for electricity supplied under the contract.</i>		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms required the customer to pay for electricity supplied under the contract. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Refer section 3.4(c) Commercial Terms. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
84 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 10 - A non-standard contract must prohibit the customer from tampering with, or bypassing, network equipment or allowing any other person to do so.</i></p>		<p>FINDING: For the duration of the audit period, Perdaman Energy's Commercial Terms included provisions to prohibit the customer from tampering with, or bypassing, network equipment or allowing any other person to do so.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer section 7.3(d) Commercial Terms. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
85 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 11 - A non-standard contract must describe the circumstances under which a retailer has the right to disconnect supply and is required to reconnect supply.</i></p>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms described the circumstances under which Perdaman Energy had the right to disconnect, as such complied with regulation 11(a). However, the Commercial Terms did not specifically detail the circumstances under which the retailer is required to reconnect supply after a disconnection has occurred as required by regulation 11(b).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS																					
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS																		
			<ul style="list-style-type: none"> Refer section 9 – Disconnection - Commercial Terms. Clause 9.3(f) states that Perdaman Energy will "endeavour to ensure" reconnection but lacks clear conditions, timeframes, or procedural steps for reconnection. For example, a reconnection commitment, conditions/timeframes for reconnection and any applicable fees. 																		
	PRIORITY - 4	CONTROLS RATING - B	COMPLIANCE RATING - 2																		
	<p>01/2024 RECOMMENDATION – To ensure compliance with Regulation 11 of the <i>Electricity Industry (Customer Contracts) Regulations</i>, the Commercial Terms should be updated to explicitly define the retailer’s obligations for reconnection following a disconnection.</p> <p>Review the Commercial Terms to ensure they describe the circumstances in which the retailer is required to reconnect supply. Addressing issues such as dispute resolution, defined timeframes and reconnection process.</p> <table border="1"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>01/2024-1</td> <td>Review and amend the Commercial Terms to clearly describe the circumstances under which the retailer must reconnect supply after disconnection.</td> <td>Regulation 11(b)</td> </tr> <tr> <td>01/2024-2</td> <td>Define clear reconnection conditions, including eligibility criteria for reconnection.</td> <td>Regulation 11(b)</td> </tr> <tr> <td>01/2024-3</td> <td>Specify timeframes for reconnection after a customer meets the reconnection conditions.</td> <td>Regulation 11(b)</td> </tr> <tr> <td>01/2024-4</td> <td>Outline the reconnection process, including customer actions, retailer responsibilities, and any fees associated with reconnection.</td> <td>Regulation 11(b)</td> </tr> <tr> <td>01/2024-5</td> <td>Incorporate dispute resolution procedures related to disconnection and reconnection.</td> <td>Regulation 11(b)</td> </tr> </tbody> </table>			Ref	Recommendation	Regulation Addressed	01/2024-1	Review and amend the Commercial Terms to clearly describe the circumstances under which the retailer must reconnect supply after disconnection.	Regulation 11(b)	01/2024-2	Define clear reconnection conditions, including eligibility criteria for reconnection.	Regulation 11(b)	01/2024-3	Specify timeframes for reconnection after a customer meets the reconnection conditions.	Regulation 11(b)	01/2024-4	Outline the reconnection process, including customer actions, retailer responsibilities, and any fees associated with reconnection.	Regulation 11(b)	01/2024-5	Incorporate dispute resolution procedures related to disconnection and reconnection.	Regulation 11(b)
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01/2024-1	Review and amend the Commercial Terms to clearly describe the circumstances under which the retailer must reconnect supply after disconnection.	Regulation 11(b)																			
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01/2024-5	Incorporate dispute resolution procedures related to disconnection and reconnection.	Regulation 11(b)																			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
86 [□] Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 12 - A non-standard contract must require the retailer to deal with security deposits and the payment of interest in the manner that is specified.</p>		<p>FINDING: The Licensee confirmed that during the audit period applicable, Perdaman Energy's Commercial Terms outlined the circumstances in which a security deposit would be required, how it would be kept and identified accounting records. Reference to the payment of accrued interest was also referenced.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer section 4.7 – Security Deposit- Commercial Terms • Note Regulation was deleted from the <i>Electricity Industry (Customer Contracts) Amendment Regulations 2022</i> which came into effect 1 January 2023. As such Regulation 12 was applicable from 17/3/2022 to 1/1/2023. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
86A+ Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 12 - If a customer contract provides for a benefit change, the contract must state that the retailer is required to inform the customer, in the time period prescribed, the benefit change, the options for supply available after the date of the benefit change and describe the way in which the retailer must give that information to the customer.</p>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms did not provide for a benefit change and as such assessment of compliance was not required.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that compliance with regulation 12 only eventuates "if" a benefit change is provided for in the non-standard form contract. • No customers were signed on to an agreement between 17/03/2022-31/03/2024 that would have been impacted by a benefit change. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
87 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 13 - A non-standard contract must describe the prices payable and the circumstances in which the prices are payable, plus the way the retailer publishes and gives notice of variations to its prices information.</p>		<p>FINDING: The Licensee confirmed that during the audit period 17/03/2022-31/03/2024, Perdaman Energy's non-standard form contract did not comply with clause 13(2)(a) and (b) of the <i>Electricity Industry (Customer Contracts) Regulations 2005</i> (amendment regulations came into effect on 01/01/2023).</p> <p>While the contract outlined the prices payable and the circumstances in which they were payable (Regulation 13(1)), it did not explicitly state how prices are published (Regulation 13(2)(a) or how customers are notified of price variations (Regulation 13(2)(b)).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Internal Audit Findings to 31 Mar 24 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted 1 small use customer was signed on 28/6//2022. • The Licensee's contract terms allowed for price changes under specific conditions (e.g., regulatory pass-throughs, network access tariff adjustments, CPI-linked increases, and material adverse event clauses). • The Licensee established an internal audit process, however, the non-compliance was not identified and was not reported in 2023 Annual Compliance Report. 	
	PRIORITY - 4	CONTROLS RATING - B		COMPLIANCE RATING - 2
	<p>02/2024 RECOMMENDATION: To ensure compliance with Regulation 13 of the <i>Electricity Industry (Customer Contracts) Regulations</i>, the non-standard contracts must be updated to explicitly outline the prices payable, the circumstances in which they are payable, and the retailer's process for publishing and notifying customers of price variations. Specific actions:</p>			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS															
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS												
	<table border="1"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>02/2024-1</td> <td>Specify how the retailer publishes its prices (e.g., website, public notices, regulatory filings).</td> <td>Regulation 13(2)(a)</td> </tr> <tr> <td>02/2024-2</td> <td>Specify how the retailer gives notice of price variations (e.g., direct customer notification, email, website updates (if appropriate)).</td> <td>Regulation 13(2)(b)</td> </tr> <tr> <td>02/2024-3</td> <td>Strengthen internal audit processes to ensure pricing compliance is actively monitored.</td> <td>Regulation 13(1) & 13(2)</td> </tr> </tbody> </table>	Ref	Recommendation	Regulation Addressed	02/2024-1	Specify how the retailer publishes its prices (e.g., website, public notices, regulatory filings).	Regulation 13(2)(a)	02/2024-2	Specify how the retailer gives notice of price variations (e.g., direct customer notification, email, website updates (if appropriate)).	Regulation 13(2)(b)	02/2024-3	Strengthen internal audit processes to ensure pricing compliance is actively monitored.	Regulation 13(1) & 13(2)		
Ref	Recommendation	Regulation Addressed													
02/2024-1	Specify how the retailer publishes its prices (e.g., website, public notices, regulatory filings).	Regulation 13(2)(a)													
02/2024-2	Specify how the retailer gives notice of price variations (e.g., direct customer notification, email, website updates (if appropriate)).	Regulation 13(2)(b)													
02/2024-3	Strengthen internal audit processes to ensure pricing compliance is actively monitored.	Regulation 13(1) & 13(2)													
88 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 14 - A non-standard contract must describe the procedures to be followed by the retailer in relation to the preparation, issue, and review of customer bills.</p>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms described the procedures followed by Perdaman Energy in relation to the preparation, issue and review of the customer's bills.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Commercial Terms sections addressed the requirements as below: <ul style="list-style-type: none"> ○ Billing Preparation – section 5.1 ○ Billing Issuance – section 5.2 ○ Billing Review – section 6.2 • Additionally overcharging and historical meter data review was detailed in the Commercial Terms. 												
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1												

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2024 - NIL		
89 Type [2]	<i>Electricity Industry (Customer Contracts) Regulations</i> , Reg 15 - A non-standard contract must describe the matters relating to the termination of the contract that are specified in the regulation.	<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms described the matters relating to the termination of the contract that are specified in the regulation, with the exception of:</p> <ul style="list-style-type: none"> ○ 15(2)(ca) in relation to circumstances where the customer consumes more than 160 MWh of electricity in any period of 12 months; and ○ 15(3)(d) &(e) the retailer or distributor may remove any network equipment at any time after the day on which the contract ends; and the customer must allow the retailer or distributor safe and unrestricted access to the supply premises for the purpose of removing network equipment. <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • PE Risk Register V2051 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Commercial Terms sections addressed the requirements as below: <ul style="list-style-type: none"> ○ 1(a),4 & 6 – circumstances of termination – section 3.3 ○ 1(b)(d) & 2(a-c)(d) – procedures for termination – section 3.3 and 3.4 ○ 1(c) – fees charges and penalties – section 3.5 ○ 3(a-c) – final meter readings, final bills 	
	PRIORITY - 4	CONTROLS RATING - B	COMPLIANCE RATING - 2

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS

No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS												
		<ul style="list-style-type: none"> The Commercial Terms section 8.1 detailed customer access obligations but did not specify that the customer must allow the retailer or distributor safe and unrestricted access to the supply premises for the purpose of removing network equipment 												
	<p>03/2024 RECOMMENDATION: The <i>Electricity Industry (Customer Contracts) Regulations</i> require that customer contracts clearly define termination rights, procedures, fees, and post-termination obligations. While Perdaman Energy’s Commercial Terms address most termination requirements, they do not fully comply with Regulation 15(2)(ca), 15(3)(d), and 15(3)(e). To achieve compliance with Regulation 15, the Commercial Terms should be amended to include the missing termination provisions, and the following compliance controls implemented:</p> <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr style="background-color: #cccccc;"> <th style="width: 10%;">Ref</th> <th style="width: 55%;">Recommendation</th> <th style="width: 35%;">Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>03/2024-1</td> <td>Amend the contract to include a clause allowing termination if the customer consumes more than 160 MWh/year.</td> <td>Regulation 15(2)(ca)</td> </tr> <tr> <td>03/2024-2</td> <td>Update the contract to explicitly state that the retailer or distributor may remove network equipment after contract termination.</td> <td>Regulation 15(3)(d)</td> </tr> <tr> <td>03/2024-3</td> <td>Amend the contract to require the customer to allow unrestricted access to remove network equipment.</td> <td>Regulation 15(3)(e)</td> </tr> </tbody> </table>		Ref	Recommendation	Regulation Addressed	03/2024-1	Amend the contract to include a clause allowing termination if the customer consumes more than 160 MWh/year.	Regulation 15(2)(ca)	03/2024-2	Update the contract to explicitly state that the retailer or distributor may remove network equipment after contract termination.	Regulation 15(3)(d)	03/2024-3	Amend the contract to require the customer to allow unrestricted access to remove network equipment.	Regulation 15(3)(e)
Ref	Recommendation	Regulation Addressed												
03/2024-1	Amend the contract to include a clause allowing termination if the customer consumes more than 160 MWh/year.	Regulation 15(2)(ca)												
03/2024-2	Update the contract to explicitly state that the retailer or distributor may remove network equipment after contract termination.	Regulation 15(3)(d)												
03/2024-3	Amend the contract to require the customer to allow unrestricted access to remove network equipment.	Regulation 15(3)(e)												
90 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 16(1A), 16(2) and 34 - A non-standard contract must inform the customer that the provisions of the contract may be amended without the customer’s consent where the amendment is required for the contract to remain consistent with a written law. A non-standard contract must describe the process for amending the contract, including requirements for approval and the way in which the amendment will be published.</p>	<p>FINDING: The Licensee updated its Standard Form Contracts (SFCs) during the audit period to comply with Regulation 16. However, the Non-Standard Electricity Contract (NSEC) for small-use customers was non-compliant with Regulations 16(1A) and 34 for the period 1/1/2023 to 31/3/2024.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Perdaman Energy Commercial Terms for Electricity Supply – V2061 												

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS									
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS						
	The non-standard contract must require the retailer to notify the customer of any amendment to the contract.		<ul style="list-style-type: none"> • Perdaman Energy - Electricity Supply Agreement • February & March 2023 Electricity Invoice -Small Use Customer • ERA website • Perdaman Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The <i>Electricity Industry (Customer Contracts) Amendment Regulations 2022</i> which gave effect to the recommendations outlined in Final Recommendations Report, were gazetted on 17 June 2022 and came into effect on 1 January 2023. • Compliance with Regulation 16 for SFCs was maintained throughout the audit period. • It was noted that although outside the audit period the licensee does not currently have any small use customers engaged under its NSEC. • The EPWA and ERA communications to Licensees indicated approximately a 6 month time period for both standard form and non-standard contracts amendments to be undertaken. The standard form contract was amended in a timely manner as required. 						
	PRIORITY - 4	CONTROLS RATING - B	COMPLIANCE RATING - 2						
	<p>04/2024 RECOMMENDATION: To achieve compliance with Regulations 16(1A) and 34, the non-standard contract should be amended, and the following compliance controls implemented:</p> <table border="1"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>04/2024-1</td> <td>Amend the non-standard contract to state that provisions may be amended without customer consent if required to align with a written law.</td> <td>Regulation 16(1A)</td> </tr> </tbody> </table>			Ref	Recommendation	Regulation Addressed	04/2024-1	Amend the non-standard contract to state that provisions may be amended without customer consent if required to align with a written law.	Regulation 16(1A)
Ref	Recommendation	Regulation Addressed							
04/2024-1	Amend the non-standard contract to state that provisions may be amended without customer consent if required to align with a written law.	Regulation 16(1A)							

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	04/2024-2	Define the process for amending the contract, including: (a) Approval requirements, (b) How amendments will be published.	Regulation 16(2)
	04/2024-3	Require the retailer to notify customers of any contract amendments	Regulation 34
	04/2024-4	Implement Regulatory Compliance Monitoring to track legal changes and apply them to contracts.	Regulations 16(1A) & 34
	04/2024-5	Establish Contract Amendment Controls to ensure proper governance of updates and customer notifications.	Regulations 16(2) & 34
	04/2024-6	Conduct Training & Accountability programs to ensure staff understand amendment and notification requirements.	Regulations 16(1A), 16(2) & 34
	04/2024-7	Introduce Independent Compliance Oversight (e.g., 2 nd party/3 rd party audits) to verify contract compliance.	Regulations 16(1A), 16(2) & 34
91 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 17 - A non-standard contract must specify the assignment of rights and obligations, including assignment without the customer's consent.</i></p>		<p>FINDING: The Licensee confirmed that for the duration of the audit period, the Commercial Terms specified Perdaman Energy's rights and obligations, including assignment without the customer's consent.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Perdaman Energy Commercial Terms for Electricity Supply – V2061 Perdaman Energy - Electricity Supply Agreement <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer Commercial Terms section 14.2.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2024 - NIL		
92 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 18 - A non-standard contract must describe the procedures that must be followed by the retailer in responding to a complaint made by a customer.</p>		<p>FINDING: The Licensee confirmed that for the duration of the audit period, the Commercial Terms together with the Small-Use Customer Pack detailed their complaints handling procedures and the subsequent escalation processes available to the customer.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 • Email to small use customer 14/06/2022 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Small Use Customer Pack specifically referred to management of complaints in accordance with Australian Standard on Complaints Handling (AS/NZS 10002:2014). • The Commercial Terms specified the Small Use Customer Pack was a document which the customer must obtain from the retailer if they were a Small-Use Customer and stated it formed part of these Commercial Terms.
	PRIORITY – 4	CONTROLS RATING – NP	COMPLIANCE RATING – 1
	2024 – NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS											
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS								
93 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 19 - A non-standard contract must specify the process that must be taken by the retailer to ensure information held by the retailer is treated confidentially.</p> <p>The customer contract must specify that the retailer has a privacy policy, and the customer can obtain a copy of the policy without charge.</p>		<p>FINDING: The Licensee’s Commercial Terms detailed Perdaman Energy’s management of customer information in accordance with the <i>Privacy Act 1988</i> (Cth) and their Privacy Policy was available on their website. However, the requirements of regulation 19(2)(a) and (b) were also noted to be non-compliant for the duration of the audit period.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 • Perdaman Energy website • Privacy Policy V3011 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Commercial Terms section 12 addressed privacy and personal information. • It was noted the Privacy Policy on the Perdaman Energy website. 								
	PRIORITY - 4	CONTROLS RATING – B		COMPLIANCE RATING - 2							
	<p>05/2024 RECOMMENDATION – To ensure full compliance with Regulation 19 of the <i>Electricity Industry (Customer Contracts) Regulations</i>, the Commercial Terms and Small Use Customer Pack should be updated to explicitly outline confidentiality requirements and customer rights regarding the retailer’s Privacy Policy. Specific actions:</p> <table border="1" data-bbox="398 1134 1841 1315"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>05/2024-1</td> <td>Update the Commercial Terms and the Small Use Customer Pack to reflect the requirements of the privacy policy and how the customer can obtain it.</td> <td>Regulation 19(1)</td> </tr> <tr> <td>05/2024-2</td> <td>Include a clause in the contract specifying that the retailer has a Privacy Policy.</td> <td>Regulation 19(2)(a)</td> </tr> </tbody> </table>			Ref	Recommendation	Regulation Addressed	05/2024-1	Update the Commercial Terms and the Small Use Customer Pack to reflect the requirements of the privacy policy and how the customer can obtain it.	Regulation 19(1)	05/2024-2	Include a clause in the contract specifying that the retailer has a Privacy Policy.
Ref	Recommendation	Regulation Addressed									
05/2024-1	Update the Commercial Terms and the Small Use Customer Pack to reflect the requirements of the privacy policy and how the customer can obtain it.	Regulation 19(1)									
05/2024-2	Include a clause in the contract specifying that the retailer has a Privacy Policy.	Regulation 19(2)(a)									

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	05/2024-3	Explicitly state in the contract that customers can obtain a copy of the Privacy Policy free of charge.	Regulation 19(2)(b)
94 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 20 - A non-standard contract must specify the governing legislation, the effect of an invalid or unenforceable provision, the way in which notice may be given and the use of electronic communication by the retailer.</p>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms specified governance by the laws of the state Western Australia, the effect of an invalid or unenforceable provision, the way in which notice may be given and the use of electronic communication by the retailer</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 • Perdaman Energy website • Privacy Policy V3011 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Commercial Terms addressed the requirements in the following sections: <ul style="list-style-type: none"> ○ 20(a) Governing Law – section 18.5 ○ 20(b) Effect of Invalid or Unforeseeable Provisions – section 18.3 ○ 20(c)(d) Notice Provisions – section 16.1 and 16.2.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
95 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 21 - A non-standard contract must not include a provision that excludes, restricts or modifies the Code of Conduct for the Supply of Electricity to Small Use Customers unless it is authorised by the Code.</i></p>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms did not contain a provision that excludes, restricts or modifies the Code of Conduct for the Supply of Electricity to Small Use Customers unless it is authorised by the Code.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 • Perdaman Energy website • Privacy Policy V3011 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Commercial Terms ensured that all statutory protections, including the Code of Conduct, remained enforceable despite any other contract terms (refer section 11.2(d)). 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
96 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 32 - A non-standard contract must include details about the cooling off period specified in the regulation.</i></p>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms and Customer included details about the cooling off period as specified by the regulation and other required refer section of NFSC on unsolicited consumer agreement.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 • Perdaman Energy website • Privacy Policy V3011 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Commercial Terms ensured cooling-off period explicitly stated (refer section 3.2), prohibition on supply without request (refer section 3.2b), customer responsibility for supply during cooling-off period (refer section 3.2(c)) and termination clause (refer section 3.3 and 3.5). • The Small-Use Customer Pack further detailed cooling-off period. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
97 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations, Reg 93(2)</i> - A non-standard contract must allow the customer to terminate the contract at any time with no less than 5 days' notice.</p>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms were for fixed term contracts and as such did not include a provision for the customer to terminate the contract at any time with no less than 5 days' notice.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 • Perdaman Energy website • Privacy Policy V3011 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The small use customer Commercial Terms addressed the requirement for fixed term contracts of 20 days notice (refer section 3.3c(ii)). 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
98 Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations, Regs 93(3) and (4) - A non-standard contract that is a fixed contract must describe the matters relating to the termination of the contract specified in the regulation.</i></p>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms described the requirement that a fixed term contract must authorise the customer to terminate the contract at any time by giving notice to the retailer not less than 20 days before the day on which the customer wants the contract to end. Additionally, it specified amount the payable by the customer, by way of penalty, in the event that the customer terminated the contract before the expiry of the term of the contract.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 • Perdaman Energy website • Privacy Policy V3011 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Commercial Terms addressed Customer Authorisation for Termination (refer section 3.3c(ii)) and Early Termination Fee Specified (refer section3.5). 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
98A + Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 34A - A non-standard fixed term contract must detail the contract expiry date, customer options available for supply following expiry, the terms and conditions that apply after expiry and the way the retailer will provide the notification in the manner specified.</p>		<p>FINDING: The Licensee’s Commercial Terms did not include an appropriate clause to fully comply with clause 34 and omitted a clause comply with this obligation 34A of the <i>Electricity Industry (Customer Contracts) Regulations 2005</i>, which came into effect 01/01/2023.</p> <p>Specifically, the Commercial Terms:</p> <ul style="list-style-type: none"> ○ Clause 34- notified customers of material price adjustments but did not clearly state that all amendments will be notified. ○ Clause 34A - provided for sending a renewal notice, it did not explicitly state all required post-expiry options and they did not guarantee the notice period falls within the 40 to 20 business day window. <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • There was no clear process to ensure that legislative amendments were consistently applied to control procedures. • The Licensee did not report a breach of obligation 98A in the 2023 Annual Compliance Report. 	
	PRIORITY - 4	CONTROLS RATING - B	COMPLIANCE RATING - 2	
	<p>06/2024 RECOMMENDATION: The Licensee should amend the Commercial Terms to ensure compliance with the <i>Electricity Industry (Customer Contracts) Regulations</i> and mitigate risks of non-compliance as follows:</p>			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS																					
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS																		
	<table border="1"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>06/2024-1</td> <td>Notify customers of all amendments (not just price adjustments)</td> <td>Regulation 34</td> </tr> <tr> <td>06/2024-2</td> <td> Include all post-expiry details in renewal notices (e) The expiry date. (f) Post-expiry supply options. (g) The terms and conditions that will apply post-expiry. (h) The notification method used by the retailer. </td> <td>Regulation 34A(1)</td> </tr> <tr> <td>06/2024-3</td> <td>Ensure expiry notifications are sent 40 to 20 business days before expiry</td> <td>Regulation 34A(2)</td> </tr> <tr> <td>06/2024-4</td> <td>Track regulatory changes & update contracts accordingly</td> <td>Regulations 16(1A), 34 and 34A</td> </tr> <tr> <td>06/2024-5</td> <td>Improve compliance reporting for breaches</td> <td>Obligations 98A and 124</td> </tr> </tbody> </table>	Ref	Recommendation	Regulation Addressed	06/2024-1	Notify customers of all amendments (not just price adjustments)	Regulation 34	06/2024-2	Include all post-expiry details in renewal notices (e) The expiry date. (f) Post-expiry supply options. (g) The terms and conditions that will apply post-expiry. (h) The notification method used by the retailer.	Regulation 34A(1)	06/2024-3	Ensure expiry notifications are sent 40 to 20 business days before expiry	Regulation 34A(2)	06/2024-4	Track regulatory changes & update contracts accordingly	Regulations 16(1A), 34 and 34A	06/2024-5	Improve compliance reporting for breaches	Obligations 98A and 124		
Ref	Recommendation	Regulation Addressed																			
06/2024-1	Notify customers of all amendments (not just price adjustments)	Regulation 34																			
06/2024-2	Include all post-expiry details in renewal notices (e) The expiry date. (f) Post-expiry supply options. (g) The terms and conditions that will apply post-expiry. (h) The notification method used by the retailer.	Regulation 34A(1)																			
06/2024-3	Ensure expiry notifications are sent 40 to 20 business days before expiry	Regulation 34A(2)																			
06/2024-4	Track regulatory changes & update contracts accordingly	Regulations 16(1A), 34 and 34A																			
06/2024-5	Improve compliance reporting for breaches	Obligations 98A and 124																			
98C + Type [2]	<p><i>Electricity Industry (Customer Contracts) Regulations</i>, Reg 34C - A non-standard contract, entered into by a non-residential customer, is required to state whether the customer must pay a security deposit, how the amount of the security deposit is calculated, the maximum amount the retailer may request, when the retailer may use the security deposit to offset the amounts owed by the customer and when the retailer must repay the security deposit.</p>		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's Commercial Terms included an appropriate clause to comply with this obligation 34C of the <i>Electricity Industry (Customer Contracts) Regulations</i> 2005, which came into effect 01/01/2023.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager 																		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	OBSERVATIONS: • The Commercial Terms addressed the requirement in sections 4.7 and 4.8.
	2024 – NIL.			
100 Type [2]	<i>Electricity Industry (Customer Contracts) Regulations, Reg 38</i> - If a licensee becomes aware of a customer taking a supply of electricity that is deemed to be supplied under the licensee’s standard form contract, the licensee must notify the customer within 5 days after becoming aware of it and provide specified information.			FINDING: The Licensee confirmed that during the audit period, no customers were supplied under the SFC. As such assessment of compliance with this obligation cannot be made. DOCUMENTS/SYSTEMS: • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Perdaman Energy - Electricity Supply Agreement • Perdaman Energy Small-Use Customer Pack V2021 PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • A review of the small use customer invoice records verified the non-supply under SFC for the connection point in respect of those premises (i.e. NMI not billed as SFC).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
12. ELECTRICITY INDUSTRY ACTION – LICENCE CONDITIONS AND OBLIGATIONS				
101 Type [2]	Electricity Industry Act, section 13(1) - A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months (or any longer period that the ERA allows).			FINDING: This is the first Performance Audit report to be provided to the ERA i for the audit period from 17 March 2022 to 31 March 2022. This performance audit was initiated in accordance with the ERA’s Audit Guidelines. The auditor was approved by the ERA. DOCUMENTS/SYSTEMS: • ERA website

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> Corporate Outlook Calendar <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> NIL.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
105 Type [2]	Economic Reg Authority (Licensing Funding) Regs 2014 - A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.			<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy paid the prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in May 2022 relating to standing data charges that was paid 7 days overdue.</p> <p>The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The General Manager confirmed the controls in relation payments.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Corporate Outlook Calendar RE_ Payment of Economic Regulation Authority Invoices <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The Licensee's control environment in relation to compliance with this requirement was noted to be effective in all but one instance. The General Manager confirmed the controls in relation payments, i.e., corporate outlook calendar.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - 2	<ul style="list-style-type: none"> It was noted that the late payment of this fee was not included in the 2023 Annual Compliance Report to the ERA refer obligation 124 for detail. A report of payments was provided by the Licensee, confirming compliance except for the one administrative oversight.
<p>07/2024 RECOMMENDATION: The Licensee confirmed that during the audit period, Perdaman Energy paid the prescribed licence fees to the ERA in accordance with the obligations, with the exception of one invoice in May 2022 relating to standing data charges that was paid 7 days overdue. However, Perdaman Energy should ensure that all late payments are reported in the Annual Compliance Report (refer recommendation Obligation 124) to maintain compliance. Given the non-compliance was administrative, had not material effect on customers or third parties and internal payment controls were established, no further recommendation is required.</p>				
106 Type [NR]	Electricity Industry Act, section 31(3) - A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.			<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy had limited capacity to minimise the extent or duration of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause. Western Power as the Network provider fulfil this obligation.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Perdaman Energy website Non Standard Electricity Contract Commercial Terms V2061 PE Small-Use Customer Pack V2021 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> In the event of a power interruption the Licensee refers the Customer to the Western Power outages website.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
2024 - NIL				

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
107 Type [2]	Electricity Industry Act, section 41(6) - A licensee must pay the costs of taking an interest in land or an easement over land.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy did not have any interests or easements in respect of land held by a public authority. DOCUMENTS/SYSTEMS: • NIL PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
108 Type [2]	Electricity Industry Act, section 54(1) - A retail or integrated regional licensee must not supply electricity to a small use customer otherwise than under a standard form contract or a non-standard form contract that complies with the Act.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy's control procedures ensured that all new contracts processed were checked for small-use compliance prior to processing. DOCUMENTS/SYSTEMS: • Perdaman Energy website • Non Standard Electricity Contract • Commercial Terms V2061 • PE Small-Use Customer Pack V2021 PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • All small use customers were engaged under a non-standard fixed-term contract.	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2024 - NIL		
109 Type [2]	Electricity Industry Act, section 54(2) - A licensee must comply with any direction by the ERA to amend the standard form contract and do so within the period specified.		<p>FINDING: The Licensee confirmed that during the audit period of the audit period, Perdaman Energy reviewed its standard form contract and as directed by the ERA.</p> <p>It was noted under the <i>Electricity Industry Act 2004</i>, the ERA must not approve a standard form contract if it considered that the contract does not meet the requirements of the <i>Electricity Industry (Customer Contracts) Regulations 2005</i> or will be inconsistent with the Act or any other written law, or any term, condition or provision of the licence. The ERA was satisfied that Perdaman Energy’s amended standard form contract meets these requirements. The revised SFC was published on the ERA website on the 6 January 2023.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Perdaman Energy website • Standard Form Contract – Terms and Conditions V3012 (published 6/1/2023) • Standard Form Contract – Terms and Conditions V2031 (Archived on ERA website) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The amendments align the contract with the new Code of Conduct for the Supply of Electricity to Small Use Customers 2022, which took effect on 20 February 2023.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
111 Type [2]	Electricity Industry Act, section 101 - A retail, distribution or integrated regional licensee must not supply electricity to small use customers unless the licensee is a member of an approved scheme and is bound by, and compliant, with any decision or direction of the electricity ombudsman under the approved scheme.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy was member of an approved scheme and there were no decisions or directions by the electricity ombudsman issued. DOCUMENTS/SYSTEMS: • Energy and Water Ombudsman - Account Activity PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • Perdaman Energy listed as Service Provider on The Energy and Water Ombudsman website. • Invoice payments to approved scheme were confirmed by the Licensee.	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
13. ELECTRICITY LICENCES – LICENCE CONDITIONS AND OBLIGATIONS				
114 Type [2]	Retail Licence, condition 6.3.1 - A licensee must ensure that an electricity marketing agent of the licensee complies with the Code of Conduct for the Supply of Electricity to Small Use Customers 2022.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy did not engage electricity marketing agents. DOCUMENTS/SYSTEMS: • Perdaman Energy Website PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • The General Manager confirmed Perdaman Energy's customers were primarily contracted by brokers, enquiries or staff.	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	<ul style="list-style-type: none"> The Licensee confirmed the use of brokers during the audit period. It is understood that these companies represent the customer, and as tender companies were engaged directly by customers, they would be considered a customer representative and not an electricity marketing agent. Therefore, it was not Perdaman Energy's obligation to ensure that brokers comply with the Code.
	2024 - NIL			
116 Type [NR]	Retail Licence, condition 6.4.2 - A licensee must, if directed by the ERA, review the standard form contract and submit to the ERA the results of that review within the time specified.			<p>FINDING: Refer to finding for obligation 109.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> ERA website Perdaman Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer to observations for obligation 109.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
117 Type [NR]	Retail Licence, condition 6.4.3 - A licensee must comply with any direction given by the ERA in relation to the scope, process and methodology of the standard form contract review.			<p>FINDING: Refer to finding for obligation 109.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> ERA website Perdaman Energy website <p>PERSONNEL INTERVIEWED:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer to observations for obligation 109.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
118 Type [2]	Retail Licence, condition 6.5.1 - A licensee can only amend the standard form contract with the ERA's approval.			<p>FINDING: Refer to finding for obligation 109.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> ERA website Perdaman Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer to observations for obligation 109.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
119 Type [2]	Retail Licence, condition 4.3.1 - A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.			<p>FINDING: Perdaman Energy maintained its financial records in compliance with Public Practice Standards, which are applicable to non-reporting entities. While the Australian Accounting Standards Board (AASB) Standards are required for reporting entities, Public Practice Standards are deemed equivalent to AASB requirements for non-reporting entities, ensuring compliance with Licence Condition 4.3.1.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> ERA Licence Application Perdaman Finance Policy and Procedures

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • The Licensee confirmed the financial and accounting records were submitted to the ERA as part of the retail licence application process.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
121 Type [2]	Retail Licence, condition 5.3.2 - A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.		FINDING: The Licensee confirmed that during the audit period, the 2024 Performance Audit was the first performance audit for the licensee and was conducted in accordance with the ERA's standard Audit Guidelines. The Licensee engaged GES for the audit period 17 March 2022 to 31 March 2024 and the engagement process adhered to the requirements of the Audit Guidelines. As such compliance with the ERA standard audit guidelines was not able to be assessed, DOCUMENTS/SYSTEMS: • ERA website • Perdaman Energy website PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
123 Type [2]	Retail Licence, condition 4.4.1 - In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy was not under external administration and there were not significant changes affecting the Licensee's ability to meet its obligations. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • ERA website • Perdaman Energy website PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
124 Type [2]	Retail Licence, condition 4.4.1 - A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy complied with the dates for the submission of reporting and licence payment requirements, with the exception of: <ul style="list-style-type: none"> ○ one minor non-compliance for the late payment of prescribed fees (payment was 7 days past the due date - refer obligation 105). ○ one standing data charge submitted after the due date in 2023. ○ 2023 annual compliance report was submitted after the due date DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Corporate Outlook Calendar • Internal Audit Findings to 31 Mar 24 • 2023 Annual Compliance Report 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • 2023 Standing Charges Data • 2023 Electricity Retail Licence Performance Reporting Datasheets • Request to Publish_2023 Performance Datasheet • ERL Audit Spreadsheet • PE Audit Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The use of a corporate outlook calendar for the scheduling of compliance related reporting was confirmed. • In addition to the issues related to the timeliness of reporting, the accuracy of reporting continued to create some issues for the Licensee compliance with some licence obligations omitted from the 2023 Annual Compliance Report (for example, type 2 reportable obligations 87, 89, 90, 93 98A, 105, 133, 271D, 280, 299, 302). • During the audit period there were significant changes to the Customer Contracts regulations and the 2022 Code of Conduct legislative requirements. • It was noted that in addition to the payment of licence fees, the Licensee had the following provision of information requirements during the audit period. <ul style="list-style-type: none"> ○ Annual Compliance Report - Compliance Reports due for submission by the 31 August annually ○ Standing Charges Data – Standing data due for submission by the 30 September annually ○ Electricity Retail Licence Performance Reporting Datasheets – due for submission by the 30 September annually and were to be published to the Perdaman Energy website within the timeframe specified by the ERA.
	PRIORITY - 2	CONTROLS RATING - B	COMPLIANCE RATING - 2

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS														
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS												
	<p>08/2024 RECOMMENDATION: To ensure ongoing compliance with regulatory requirements, Perdaman Energy must implement a structured process for tracking legislative changes and ensuring accurate and timely reporting. Specifically:</p> <table border="1"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>08/2024-1</td> <td>Implement a Formal Process for Tracking Legislative Changes</td> <td>Refer Electricity Compliance Reporting Manual Obligations.</td> </tr> <tr> <td>08/2024-2</td> <td>Strengthen Compliance Monitoring & Internal Controls <ul style="list-style-type: none"> - Internal audit - Automation of compliance alerts - Pre-submission reviews </td> <td>Retail Licence, condition 4.5.1 Retail Licence, condition 3.8.1 and 3.8.2</td> </tr> <tr> <td>08/2024-3</td> <td>Review the 2024 Annual Compliance Report and include the omitted non-compliances in the 2025 Annual Compliance Report</td> <td>Retail Licence, condition 4.5.1</td> </tr> </tbody> </table>	Ref	Recommendation	Regulation Addressed	08/2024-1	Implement a Formal Process for Tracking Legislative Changes	Refer Electricity Compliance Reporting Manual Obligations.	08/2024-2	Strengthen Compliance Monitoring & Internal Controls <ul style="list-style-type: none"> - Internal audit - Automation of compliance alerts - Pre-submission reviews 	Retail Licence, condition 4.5.1 Retail Licence, condition 3.8.1 and 3.8.2	08/2024-3	Review the 2024 Annual Compliance Report and include the omitted non-compliances in the 2025 Annual Compliance Report	Retail Licence, condition 4.5.1	
Ref	Recommendation	Regulation Addressed												
08/2024-1	Implement a Formal Process for Tracking Legislative Changes	Refer Electricity Compliance Reporting Manual Obligations.												
08/2024-2	Strengthen Compliance Monitoring & Internal Controls <ul style="list-style-type: none"> - Internal audit - Automation of compliance alerts - Pre-submission reviews 	Retail Licence, condition 4.5.1 Retail Licence, condition 3.8.1 and 3.8.2												
08/2024-3	Review the 2024 Annual Compliance Report and include the omitted non-compliances in the 2025 Annual Compliance Report	Retail Licence, condition 4.5.1												
125 Type [2]	Retail Licence, condition 3.8.1 and 3.8.2 - A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy complied with the requirements to publish the Electricity Retail Licence Performance Reporting Datasheets for the reporting year 2023. Additionally, the Licensee provided the revised Standard Form Contract for publication on the ERA website prior to the amended legislation taking effect.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Perdaman Energy website • 2023 Electricity Retail Licence Performance Reporting Datasheets • Request to Publish_2023 Performance Datasheet 												

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Standard Form Contract <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The 2023 datasheets were published within 7 days. • Perdaman Energy's Website published the datasheets as required.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
126 Type [2]	Retail Licence, condition 3.7.1 - All notices must be in writing, unless otherwise specified.		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy demonstrated evidence of notices and correspondence with ERA in regard to Perdaman Energy's Retail Licence obligations.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • ERA website • Perdaman Energy website • CRM • Emails <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The use of CRM to record outgoing communications with the ERA was undertaken by the Licensee.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
14. CODE OF CONDUCT – LICENCE CONDITIONS AND OBLIGATIONS			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
MARKETING				
129A + Type [2]	2022 Code of Conduct, CI 8 - A retailer must ensure that its electricity marketing agents comply with Part 2		FINDING: The Licensee confirmed that for the duration of the audit period applicable, Perdaman Energy. does not use electricity marketing agent DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman-Energy-Standard-form-contract V2031 • Standard Form Contract – Terms and Conditions V3012 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • This code is not the only compliance obligation in relation to marketing. Other State and Commonwealth laws apply to marketing activities, including the <ul style="list-style-type: none"> ○ <i>Fair Trading Act 2010,</i> ○ <i>Spam Act 2003 (Commonwealth),</i> ○ <i>Spam Regulations 2021 (Commonwealth),</i> ○ <i>Do Not Call Register Act 2006 (Commonwealth),</i> ○ <i>Telecommunications (Telemarketing and Research Calls) Industry Standard 2017 (Commonwealth) and the</i> ○ <i>Privacy Act 1988 (Commonwealth).</i> 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
130 Type [2]	2022 Code of Conduct, CI 9(1) - A retailer or electricity marketing agent must ensure that standard form contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified, in clause 9(1).		FINDING: The Licensee confirmed that for the duration of the audit period applicable, Perdaman Energy did not use SFC during the audit period. DOCUMENTS/SYSTEMS:	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Perdaman-Energy-Standard-form-contract V2031 • Standard Form Contract – Terms and Conditions V3012 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee confirmed they did not use marketing agents during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
131 Type [2]	2022 Code of Conduct, CI 9(2) - Subject to subclause 9(3), the retailer or electricity marketing agent must give to the customer the specified information in subclause 9(2) no later than on, or with, the customer's first bill.		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable, Perdaman Energy did not use SFC during the audit period.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman-Energy-Standard-form-contract V2031 • Standard Form Contract – Terms and Conditions V3012 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee confirmed they did not use marketing agents during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
132 Type [2]	2022 Code of Conduct, CI 10(1) - A retailer or electricity marketing agent must ensure that non-standard contracts, which are not unsolicited consumer agreements, are entered into according to the manner set out, and the contract is provided as specified, in clause 10(1).		<p>FINDING: The Licensee confirmed that during the audit period, no non-standard contracts were entered into over the phone. All contracts were executed through written agreements, ensuring compliance with Clause 10(1).</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<p>Additionally, the Licensee obtained and retained verifiable customer consent before entering into non-standard contracts and provided copies of contracts in accordance with the required timeframes.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy - Electricity Supply Agreement • Commercial Terms V2061 • Email to small use customer 14/06/2022 • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • There was only one small use customer contract executed during the audit period. The licensee confirmed compliance with the requirements of 10(1)(b), including the 5 business day timeframes.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
133 Type [2]	2022 Code of Conduct, CI 10(2) - A retailer or electricity marketing agent must ensure that the information specified in subclause 10(2) is provided to the customer before entering into a non-standard contract.			<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable (i.e., 17/03/2022 to 31/03/2024), Perdaman Energy included a reference to general information on the safe use of electricity in the NSEC new contract process.</p> <p>The Licensee used the Small Use Customer Pack to convey the requirements and confirmation of inclusion of all information as specified in subclause 2.3(2) was noted.</p> <p>For the audit period 17/03/2022 to 31/03/2024, subsequent to the effect of the 2022 Code of Conduct, the Licensee did not include the requirement of clause 10(2)(a)(ii) of the Code of Conduct, which came into effect 20/02/2023.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>Specifically requiring Perdaman Energy prior to entering into a non-standard contract with a customer, to details of the difference between the non-standard contract and the standard form contract.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Non Standard Electricity Contract • Commercial Terms V2061 • PE Small-Use Customer Pack V2021 • Email to small use customer 14/06/2022 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • For the period 20/2/2023 to 31/03/2024 there were no customers were contracted without Perdaman Energy having provided the summary difference between Standard Form and non-Standard Form contracts. • Email to small use customer dated 14/6/2022 confirmed customer received ESA, commercial terms and small use customer pack. The Licensee confirmed a process was established to acknowledge the receipt of the required documentation. • The Small-Use Customer Pack referenced the existence of a Standard Form Contract but did not provide a required summary of differences
	PRIORITY - 4	CONTROLS RATING - B	COMPLIANCE RATING - 2
<p>09/2024 RECOMMENDATION: To ensure compliance with the Code of Conduct for the Supply of Electricity to Small-Use Customers 2022 clause 10(2)(a)(ii) the Licensee must update its documentation to require that before entering into a non-standard contract, the retailer must provide customers with specific information:</p>			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS									
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS						
	<table border="1"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>09/2024-1</td> <td>Update the Small-Use Customer Pack to include a clear summary of the differences between Standard and Non-Standard contracts.</td> <td>Clause 10(2)(a)(ii)</td> </tr> </tbody> </table>	Ref	Recommendation	Regulation Addressed	09/2024-1	Update the Small-Use Customer Pack to include a clear summary of the differences between Standard and Non-Standard contracts.	Clause 10(2)(a)(ii)		
Ref	Recommendation	Regulation Addressed							
09/2024-1	Update the Small-Use Customer Pack to include a clear summary of the differences between Standard and Non-Standard contracts.	Clause 10(2)(a)(ii)							
133A + Type [2]	2022 Code of Conduct, CI 10(3) - If subclause (4) applies, when a customer enters into a non- standard contract with a retailer, the retailer or an electricity marketing agent must give the information specified in clause 10(3)		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy entered into a non- standard contract with a retailer, the retailer or an electricity marketing agent must give the information specified in clause 10(3)</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Non Standard Electricity Contract • Commercial Terms V2061 • PE Small-Use Customer Pack V2021 • Western Power Website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's non-standard contracts include: <ul style="list-style-type: none"> (a) how the customer may obtain — <ul style="list-style-type: none"> (i) a copy of this code; and (ii) details of all relevant tariffs, fees, charges, alternative tariffs and service levels that may apply to the customer; (b) the scope of this code; (c) that Perdaman Energy's must comply with this code; 						

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			(d) how the Perdaman Energy may assist if the customer is experiencing problems paying a bill; (e) Western Powers 24-hour telephone number for faults and emergencies; (f) Not applicable as no residential customers; (g) how to make an enquiry of, or complaint to, the Perdaman Energy; (h) general information on the safe use of electricity (refer Customer Pack).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
135 Type [2]	2022 Code of Conduct, CI 10(5) - Subject to subclause 10(4), a retailer or electricity marketing agent must obtain the customer's verifiable confirmation that the specified information in subclause 10(2), as applicable, has been provided.		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy used a NSEC which included obtaining verifiable consent. Specific, confirmation of compliance with subclause 2 was confirmed in relation to cooling off periods.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Non Standard Electricity Contract • Commercial Terms V2061 • Perdaman Energy Letter of Authority V4011 • Sample VCF [HFM] • CRM • Email to small use customer 14/06/2022 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The verifiable confirmation was reviewed for the small use customer applicable to the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2024 - NIL			
137 Type [2]	2022 Code of Conduct, CI 11(2) - A retailer or electricity marketing agent must provide contact details, including their telephone number, to a customer and ensure that the customer is able to contact the retailer or electricity marketing agent during normal business hours for the purposes of enquiries, verifications and complaints.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy complied with the standards of conduct as applicable to retailers and marketing agents as defined in clause 11(2).</p> <p>There were no further non compliances identified during the audit period.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Letter of Authority V4011 • Perdaman Energy website • Complaints Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The licensee confirmed email contact details and information of the letter of authority and website. • The majority of customers were large use customers. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
138 Type [2]	2022 Code of Conduct, CI 12(1) - A retailer or electricity marketing agent must, on request, provide a customer with the information specified in subclause 12(1).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, no requests were made by customers for information specified in subclause 2.5(1) (a) and (b). It was noted that this information was provided within the Customer Pack, Commercial Terms and the contact number was listed in the Licensee’s website. Perdaman Energy does not use marketing agents.</p> <p>DOCUMENTS/SYSTEMS:</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> • Non Standard Electricity Contract • Commercial Terms V2061 • Perdaman Energy Letter of Authority V4011 • Perdaman Energy Website • Complaints Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee provided an example of retailer’s identification card including an identification number.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
139 Type [2]	2022 Code of Conduct, CI 12(2) - A retailer or electricity marketing agent who meets with a customer face to face must: <ul style="list-style-type: none"> • display a clearly visible and legible identity card showing the information specified in subclause 12(2)(a); and • provide the written information specified in subclause 12(2)(b) as soon as practicable following a request by the customer. 			<p>FINDING: The Licensee confirmed that for the duration of the audit period, control procedures and training ensured all staff required had compliant identity cards, a sample was provided. Further, no requests were made for information specified in subclause 2.5(2)(b), however all of this information (subclause 2.5(b)(i) – (vi) was also available if required.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Non-Standard Electricity Contract • Commercial Terms V2061 • Perdaman Energy Letter of Authority V4011 • Sample VCF [HFM] • CRM

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> • Complaints Register PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • The Licensee provided an example of retailer's identification card including an identification number.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
140 Type [2]	2022 Code of Conduct, CI 13 - A retailer or electricity marketing agent who visits a person's premises for the purposes of marketing must comply with any clearly visible signs indicating that canvassing is not permitted at the premises, or no advertising is to be left at the premises.			FINDING: The Licensee confirmed that for the duration of the audit period, that Perdaman Energy staff did not visit a person's premise for the purposes of marketing. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Non-Standard Electricity Contract • Commercial Terms V2061 • Perdaman Energy Letter of Authority V4011 • Sample VCF [HFM] • CRM • Complaints Register PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • The licensee confirmed all required staff were aware of their obligations to b compliant with any clearly visible signs indicating that canvassing was not permitted at the premises, or no advertising was to be left at the premises.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2024 - NIL			
CONNECTION				
143 Type [2]	2022 Code of Conduct, CI 18(1) - If a retailer agrees to sell electricity to a customer or arrange for the connection of the customer's supply address, the retailer must forward the customer's request for the connection to the distributor.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, the obligation to forward a connection request to Western Power was undertaken. Compliance with this requirement was evident on the Web Portal.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Non-Standard Electricity Contract • Commercial Terms V2061 • Perdaman Energy Letter of Authority V4011 • Sample VCF [HFM] • CRM • Complaints Register • WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Signed NSECs were confirmation of agreement to sell electricity to a customer or arrange for the connection of the customer's supply address. 	
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
144 Type [2]	2022 Code of Conduct, CI 18(2) - A retailer must forward the customer's request for connection to the distributor that same day, if the request is received before 3pm on a business day; or the next business day if the request is received after 3pm or on a weekend or public holiday.		FINDING: The Licensee confirmed that for the duration of the audit period, the obligation to forward timely connection requests to Western Power was undertaken. Compliance with this requirement was evident on the Web Portal. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Non-Standard Electricity Contract • Commercial Terms V2061 • Perdaman Energy Letter of Authority V4011 • Sample VCF [HFM] • CRM • Complaints Register • WP Web Portal PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
BILLING				
145 Type [2]	2022 Code of Conduct, CI 19(1) - A retailer must issue a bill at least once every 100 days, except for the circumstances specified in subclause 19(2).		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy's billing procedures ensured, bills were issued at least once every 100 days, except for the circumstances specified in subclause 19(2). DOCUMENTS/SYSTEMS:	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Perdaman Energy SUC Bill sample Billing spreadsheet CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Sample SUC bills provided for review confirmed monthly billing cycle.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
146 □ Type [2]	2018 Code of Conduct, CI 4.2(1) - For the purposes of subclause 4.1(a)(ii), a retailer has given a customer notice if, prior to placing a customer on a shortened billing cycle, the retailer advises the customer of the information specified in subclause 4.2(1).		<p>FINDING: The Licensee confirmed that during the audit period applicable, there were no Small-Use Customers (SUC) placed on a shortened billing cycle. Additionally, as the Licensee was not permitted to supply residential customers, the provision regarding shortened billing cycles for residential customers did not apply.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Perdaman Energy SUC Bill sample Billing spreadsheet CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Billing records confirmed that all customers remained on their standard billing cycle.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	Obligation removed from amended regulations as such only applicable to the audit period 17/3/2022 to 20/2/2023.		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2024 - NIL		
146A + Type [2]	2022 Code of Conduct, CI 20(1) - A retailer must not place a customer on a shortened billing cycle unless subclause 20(2) applies.		FINDING: The Licensee confirmed that during the audit period, there were no customers on a shortened billing cycle. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Billing records confirmed that no small use customers were placed on a shortened billing cycle during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	
	2024 - NIL		
148 Type [2]	2022 Code of Conduct, CI 20(3) - A retailer must give a customer notice with the information specified in 20(3), within 10 business days after placing the customer on a shortened billing cycle under subclause 20(2).		FINDING: The Licensee confirmed that during the audit period, there were no customers on a shortened billing cycle. As a result, the requirement for the customer to be provided 10 days notice in relation to the shortened billing cycle could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • It was noted that the Commercial Terms did not reference shortened billing.
	2024 - NIL			
149 Type [2]	2022 Code of Conduct, CI 20(4) - A retailer must ensure that a shortened billing cycle under subclause 20(2) must be at least 10 business days.			FINDING: The Licensee confirmed that during the audit period, there were no customers on a shortened billing cycle. As such, the requirement for the shortened billing cycle to be at least 10 business days could not be assessed. DOCUMENTS/SYSTEMS: • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
150 Type [2]	2022 Code of Conduct, CI 20(5) - On request, a retailer must return a customer who is subject to a shortened billing cycle, under subclause 20(2), to the billing cycle that previously applied if the customer has paid 3 consecutive bills by the due date.			FINDING: The Licensee confirmed that during the audit period, there were no customers on a shortened billing cycle. As a result, the requirement to return a customer to their former billing cycle after paying three consecutive bills on time was not applicable and could not be assessed.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
151 Type [2]	2022 Code of Conduct, CI 20(6) - A retailer must inform a customer, who is subject to a shortened billing cycle, under subclause 20(2), at least every 3 months about the conditions upon which the customer can, upon request, be returned to the previous billing cycle under subclause 20(6).		<p>FINDING: The Licensee confirmed that during the audit period, there were no customers placed on a shortened billing cycle. As a result, the requirement to inform customers at least once every three months about their eligibility to return to their former billing cycle was not applicable and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
152 □ Type [2]	2018 Code of Conduct, CI 4.3(1) - Notwithstanding clause 4.1, on receipt of a request by a customer, a retailer may provide the customer with a bill that reflects a bill-smoothing arrangement with respect to any 12-month period.		FINDING: The Licensee confirmed that during the audit period applicable, there were no customers on a bill smoothing arrangement. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Obligation removed from amended regulations as such only applicable to the audit period 17/3/2022 to 20/2/2023. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
153 Type [2]	2018 Code of Conduct, CI 4.3(2) - If a retailer provides a customer with a bill under a bill-smoothing arrangement, the retailer must ensure that the conditions specified in subclause 4.3(2) are met.		FINDING: The Licensee confirmed that during the audit period applicable, there were no customers on a bill smoothing arrangement. As such compliance with the requirements of clause 4.3(2) were not required. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • Obligation removed from amended regulations as such only applicable to the audit period 17/3/2022 to 20/2/2023.
	2024 - NIL		
154 □ Type [2]	2018 Code of Conduct, CI 4.4 - A retailer must issue a bill to a customer at the customer’s supply address, unless the customer has nominated another address or an electronic address.		FINDING: The Licensee confirmed that during the audit period applicable, bills were sent to the nominated electronic address, or other nominated address if required. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM • Perdaman Energy - Electricity Supply Agreement PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Billing details were specified in the ESA. • Obligation removed from amended Code of Conduct, as such it was only applicable to the audit period 17/3/2022 to 20/2/2023. It was noted in the amended 2022 Code of Conduct required retailers to ensure they complied with updated payment plan requirements, particularly for customers experiencing financial hardship in lieu of bill smoothing.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
155 □ Type [2]	2018 Code of Conduct, CI 4.5(1) - A retailer must include the minimum prescribed information in subclause 4.5(1) on a customer’s bill, unless the customer agrees otherwise.		<p>FINDING: The Licensee confirmed that during the audit period applicable, Perdaman Energy included the applicable minimum prescribed information in subclause 4.5(1) on a customer’s bill.</p> <p>Sample bills were reviewed during the audit period, compliance with the relevant minimum prescribed information was evident. It was noted that subclauses 4.5(1)(b), (c), (j),(k) and (bb) were not applicable to the licensee as they did not have any customers with the meter type specified and they did not have any residential customers.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Commercial Terms detailed billing requirements. • Obligation removed from amended Code of Conduct, as such it was only applicable to the audit period 17/3/2022 to 20/2/2023. Refer to obligation 155A in the amended 2022 Code of Conduct for requirements 20/2/2023 to 31/3/2024. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
155A + Type [2]	2022 Code of Conduct, CI 21(1) - In addition to any information required to be included on a customer’s bill under another provision of this code, a retailer must include the information set out in subclauses 21(2), (3), (4), (5) and (6).		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable, that in addition to the required contents on a customer’s bill under another provision of this code, Perdaman Energy included the information set out in subclauses 21(2), (3), (4), (5) and (6).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Obligation 155A was applicable during the audit period from 20/2/2023 to 31/3/2024. 	
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
156 Type [2]	2022 Code of Conduct, CI 21(9) - If a retailer wishes to bill a customer for a historical debt, the retailer must advise the customer of the amount of the historical debt and its basis, no later than the next bill in the customer’s billing cycle.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, there were no historical debts identified or billed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2024 - NIL		
157 □ Type [2]	2018 Code of Conduct, CI 4.6 - Subject to clauses 4.3 and 4.8, a retailer must base a customer's bill on the following: <ul style="list-style-type: none"> the distributor's or metering agent's reading of the meter at the customer's supply address; the customer's reading of the meter in the circumstances specified in subclause 4.6(1)(b); or if the connection point is a Type 7 connection point, the procedure is set out in the metrology procedure or Metering Code, or as set out in any applicable law. 		FINDING: The Licensee confirmed that for the duration of the audit period applicable, the bills were based on the Western Power's reading and there were no customers reading meters or Type 7 connection points. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> Perdaman Energy SUC Bill sample Billing spreadsheet CRM PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> Obligation removed from amended Code of Conduct, as such it was only applicable to the audit period 17/3/2022 to 20/2/2023. Refer to obligation 157A in the amended 2022 Code of Conduct for requirements 20/2/2023 to 31/3/2024.
	PRIORITY - 4	CONTROLS RATING - NP	
	2024 - NIL		
157A + Type [2]	2022 Code of Conduct, CI 22(1) - A retailer must base a customer's bill on the criteria specified in 22(1).		FINDING: The Licensee confirmed that for the duration of the audit period applicable, that Perdaman Energy based a customer's bill on the criteria specified in 22(1). DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> Perdaman Energy SUC Bill sample Billing spreadsheet CRM

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • Obligation 157A was applicable during the audit period from 20/2/2023 to 31/3/2024.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
157B + Type [2]	2022 Code of Conduct, CI 22(2) - A bill will be taken to comply with subclause 21 (1)(a) if the bill reflects a smoothing or similar arrangement that has been entered into between the retailer and the customer.		FINDING: The Licensee confirmed that for the duration of the audit period applicable, there were no customers whose bills were subject to smoothing arrangements. DOCUMENTS/SYSTEMS: • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • Obligation 157B was applicable during the audit period from 20/2/2023 to 31/3/2024.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
158 Type [NR]	2022 Code of Conduct, CI 22(3) - If a retailer is required to comply with subclause 22(1)(a), the retailer must use its best endeavours to ensure that an actual value is obtained as frequently as required to prepare its bills.		FINDING: The Licensee confirmed that for the duration of the audit period, Western Power was responsible for issuing Perdaman Energy with daily “Meter Data Notifications” via the Web Portal. There were no instances of failure to provide meter data (estimated or actual) for invoicing purposes.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Estimated data was noted to be referenced on one invoice during the audit period.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
158A + Type [2]	2022 Code of Conduct, CI 22(4) - The retailer must ensure that the customer is provided with a written record of any method agreed between the retailer and the customer under subclause 22(1)(c)		<p>FINDING: The Licensee confirmed that for the duration of the audit period, a written record of any method agreed for the basis of a bill was defined in the non-standard form contract an on the electricity bills.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM • ESA SUC NSEC Agreement applicable to audit period. <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
159 □ Type [2]	2018 Code of Conduct, CI 4.8(1) - If a retailer is unable to reasonably base a bill on a reading of the meter, a retailer must give the customer an estimated bill.		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable, Perdaman Energy did not issue estimated bills where actual meter data was not available.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Estimated data was noted to be referenced on one invoice during the audit period. However, as the amended Code of Conduct came into effect 20/2/2023 this was outside the period of time in which obligation 159 was applicable i.e. December 2023 and January 2024 invoices. • This obligation was replaced by obligation 160 on 20/2/2023 when the amended Code of Conduct came into effect.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
160 Type [2]	2022 Code of Conduct, CI 23(1) - If a retailer has based a customer's bill on an estimation, a retailer must clearly specify on the bill the information required under subclause 23(1).		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable, Perdaman Energy clearly specified all of the requirements of 23(1) on the customer's bill. It was noted that there was one SUC bill that was based on estimated data between 20/2/2023 and 31/3/2024, the customer could request the basis/reason for the estimation, verification of energy data and a meter reading.</p> <p>Sample bills confirmed compliance with the requirements.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee has established processes within their customised billing system for the identification of bills with estimated data. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
161 Type [2]	2022 Code of Conduct, CI 23(2) - On request, a retailer must provide to a customer of the basis and the reason for the estimation ⁹ ⁹ Refer to clause 23(3) of the code for a definition of an estimated bill in situations where the meter reading is partly based on estimated data (including interval meters).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not requested to provide their customer information regarding the basis and reason for an estimation</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • There was one instance where estimated data was used on a SUC bill during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
162 □ Type [2]	2018 Code of Conduct, Cl 4.9 - In accordance with clause 4.19, if a retailer gives a customer an estimated bill and the meter is subsequently read, the retailer must include an adjustment on the next bill to take account of the actual meter reading.			<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable (i.e. 17/3/2022 to 20/2/2023), adjustments were not required to be made on the next billing cycle when the actual meter data was received, and the adjustment could be made.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Examples of bill adjustments were not evident in the bills provided for review, for example January invoice 4010011 (issued 2/2/2024) did not reflect the estimated data adjustment as noted in the previous billing cycle on invoice December 3120011 (issued 3/1/2024) due to solar generation exactly balancing the estimate. • This obligation was removed on 20/2/2023 when the amended 2022 Code of Conduct came into effect.
	PRIORITY - 4	CONTROLS RATING – NP	COMPLIANCE RATING - 1	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2024 - NIL			
163 Type [NR]	2022 Code of Conduct, CI 24(2) - If a customer satisfies the requirements specified in subclause 24(1), a retailer must use its best endeavours to replace an estimated bill with a bill based on an actual reading.		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable (20/2/2023 – 31/03/2024), there were no cases where estimated bills resulted from a failure to access the meter. As such, Clause 24(1) was not triggered.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • There were no instances where a bill was estimated due to a customer failing to provide access to the meter. 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 – NIL.			
164 [□] Type [2]	2018 Code of Conduct, CI 4.11(1) - If a customer requests the meter to be tested and pays a retailer’s reasonable charge (if any) for doing so, a retailer must request the distributor or metering agent to do so.		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable, there were no customer requests for meter investigations (i.e. meter tests) which were required to be communicated to Western Power.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	<ul style="list-style-type: none"> • CRM PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • This obligation was applicable for the audit period 17/3/2022 to 20/2/2023.
	2024 - NIL			
165 [□] Type [2]	2018 Code of Conduct, Cl 4.11(2) - If the meter is tested and found to be defective, the retailer's reasonable charge for testing the meter (if any) is to be refunded to the customer.			FINDING: The Licensee confirmed that for the duration of the audit period, there were no meter tests undertaken and as such no meters were found to be defective. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • The Licensee confirmed there were no non-energy invoices and monitoring of WP costs applicable during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
166 Type [2]	2022 Code of Conduct, Cl 25(2) - If a retailer offers alternative tariffs and a customer meets the circumstances in subclause 25(1)(a) and (b), the retailer must transfer the customer to the other tariff within 10 business days of the customer satisfying subclause 25(1)(b).			FINDING: The Licensee does not offer alternative tariffs. Compliance with this obligation could not be assessed. DOCUMENTS/SYSTEMS:

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2024 - NIL			
166A + Type [2]	2022 Code of Conduct, Cl 25(3) - If a customer transfers from one tariff to another under clause 25, the effective date is as subscribed under subclause 25(3).		<p>FINDING: The Licensee does not offer alternative tariffs. Compliance with this obligation could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
167 Type [2]	2022 Code of Conduct, CI 26(2) - If a customer is no longer eligible to receive a tariff, a retailer must notify the customer prior to changing the customer to another tariff.		FINDING: Refer to finding for Obligation 166. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
168 [□] Type [NR]	2018 Code of Conduct, CI 4.14(1) - If a customer requests a retailer to issue a final bill at the customer's supply address, a retailer must use reasonable endeavours to arrange for that final bill in accordance with the customer's request.		FINDING: The Licensee confirmed that for the duration of the audit period applicable, there were no final bills issues. As a result, there was no requirement for Perdaman Energy to use reasonable endeavours to arrange for final bills in accordance with customer's requests. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • PE Commercial Terms V2061 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • There were no customer complaints raised during the audit period. • The obligation was applicable 17/3/2022 to 20/2/2023 and was replaced by obligations 183A-E from 20/2/2023 to 31/3/2024. 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2024 - NIL		
169 □ Type [2]	2018 Code of Conduct, CI 4.14(2) - Subject to subclause 4.14(3), if a customer's account is in credit at the time of account closure, a retailer must, in accordance with the customer's instructions, transfer the amount of credit to another account that the customer has with the retailer or a bank account nominated by the customer, within 12 business days or other agreed time.		<p>FINDING: The Licensee confirmed that during the audit period (17/03/2022 – 20/02/2024), there were no customer requests for a final bill, and no final bills were issued. As a result, Clause 4.14 was not triggered</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The obligation was applicable 17/3/2022 to 20/2/2023 and was replaced by obligations 183A-E from 20/2/2023 to 31/3/2024
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
170 □ Type [2]	2018 Code of Conduct, CI 4.14(3) - If a customer's account is in credit at the time of account closure and the customer owes a debt to a retailer, the retailer may use that credit to offset the debt owed to the retailer by giving the customer written notice. If any amount remains after the set off, the retailer must ask the customer for instructions to transfer the remaining amount in accordance with subclause 4.14(2).		<p>FINDING: The Licensee confirmed that during the audit period (17/03/2022 – 31/03/2024), no final bills were requested or issued. Since no customer accounts were closed during the audit period, no obligations under either Code were triggered.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Clause 4.14 of the 2018 Code of Conduct was applicable from 17/03/2022 to 20/02/2023, after which it was replaced by Clauses 183A-E of the 2022 Code of Conduct (effective 20/02/2023 to 31/03/2024). .
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
171 Type [2]	2022 Code of Conduct, Cl 27(1) - If a customer, after receiving a bill, disputes the amount to be paid, the retailer must review the bill on request by the customer, subject to the customer paying: <ul style="list-style-type: none"> <input type="checkbox"/> that portion of the bill under review that the customer and the retailer agree is not in dispute; <input type="checkbox"/> an amount equal to the average amount of the customer's bill over the previous 12 months (excluding the bill in dispute). 		<p>FINDING: The Licensee confirmed that during the audit period applicable (20/02/2023 – 31/03/2024), no customers requested a bill review under Clause 27(1) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers. As a result, this obligation was not triggered</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Note this clause was clause 4.15 under the 2018 SUC Code of Conduct. • Clauses 183A-E of the 2022 Code of Conduct (effective 20/02/2023 to 31/03/2024).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	<ul style="list-style-type: none"> • No customers requested a bill review under Clause 27(1). • No disputes regarding billing amounts were identified. 		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2024 - NIL		
172 Type [2]	2022 Code of Conduct, CI 27(2)(a) - If a retailer has reviewed a customer's bill and is satisfied that the bill is correct, the retailer may require the customer to pay the amount outstanding (if any). The retailer must advise the customer that the customer may request for a meter test and also the existence and operation of the retailer's standard complaints and dispute resolution procedures and details about making a complaint to the electricity industry ombudsman.		<p>FINDING: The Licensee confirmed that during the audit period applicable (20/02/2023 – 31/03/2024), Perdaman Energy 's billing process referenced the availability of meter testing following bill review. There was no requirement for a bill review and as a result, this obligation was not triggered.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was confirmed that during the audit period, there were no bill reviews required to be handled. • It was noted that reference to Perdaman Energy's complaint handling process was noted on customer bills sampled.
	PRIORITY - 4	CONTROLS RATING – NP	COMPLIANCE RATING - NR
	2024 - NIL		
173 Type [2]	2022 Code of Conduct, CI 27(2)(b) - If a retailer has reviewed a customer's bill and is satisfied that the bill is incorrect, the retailer must comply with clause 29 or 30 as the case requires and may require the customer to pay the amount (if any) of the bill that is outstanding.		<p>FINDING: The Licensee confirmed that during the audit period, there were no customer requests for bill reviews, and therefore, no instances where a bill was found to be incorrect. As a result, the requirements of Clause 27(2)(b) of the 2022 Code of Conduct were not triggered and could not be assessed.</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Complaints Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No customer disputes or bill reviews were conducted during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
174 Type [2]	2022 Code of Conduct, CI 27(3) - A retailer must inform a customer of the outcome of the review of a bill as soon as practicable after it is completed.		<p>FINDING: The Licensee confirmed that during the audit period, there were no customer requests for bill reviews. As a result, no reviews were conducted, and the requirement under Clause 27(3) of the 2022 Code of Conduct to inform customers of the outcome of a review was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Complaints Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No customer disputes or bill reviews occurred during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
175 Type [2]	2022 Code of Conduct, CI 27(4) - If a retailer has not informed a customer of the outcome of the review of a bill within 20 business days from the date of receipt of the request for review, the retailer must notify the customer with notification of the status of the review as soon as practicable after the expiration of that period.		<p>FINDING: The Licensee confirmed that during the audit period (20/02/2023 – 31/03/2024), there were no customer requests for bill reviews. As a result, the requirement under Clause 27(4) of the 2022 Code of Conduct to notify customers of the status of an ongoing review was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample • Complaints Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No customer disputes or bill reviews were recorded during the audit period. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
175A + Type [2]	2022 Code of Conduct, CI 28(1) - If a customer, after receiving a bill, requests that the energy data be checked or the meter be tested, the retailer must arrange for a check of the energy data or testing of the meter (as the case requires).		<p>FINDING: The Licensee confirmed that during the audit period (20/02/2023 – 31/03/2024), no customers requested a check of their energy data or a meter test. As a result, the requirement under Clause 28(1) of the 2022 Code of Conduct to arrange for an energy data check or meter test was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> No requests for meter testing or energy data verification were received.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
175B + Type [2]	2022 Code of Conduct, CI 28(3) - If the energy data is checked and found to be incorrect or the meter is tested and found to be defective, the retailer must refund any payment made under subclause 28(2).			<p>FINDING: The Licensee confirmed that during the audit period, no customers requested a check of their energy data or a meter test. As a result, no instances arose where incorrect energy data or a defective meter was identified, and no refunds under Clause 28(3) of the 2022 Code of Conduct were required</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Billing spreadsheet CRM Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> No customer disputes regarding meter accuracy or energy data were recorded
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
176 Type [2]	2022 Code of Conduct, CI 29(1) - If a retailer proposes to recover an amount undercharged a retailer must do so in the manner specified in subclause 29(1).		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances of undercharging identified. As a result, the requirements under Clause 29(1) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to recover undercharged amounts were not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample • Complaints Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No notifications of undercharging were issued. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
177 Type [NR]	2022 Code of Conduct, CI 30(1) - If a customer (including a customer who has vacated the supply address) has been overcharged the retailer must: <ul style="list-style-type: none"> <input type="checkbox"/> use its best endeavours to inform the customer of the amount overcharged within 10 business days after the retailer becomes aware of the overcharging; and <input type="checkbox"/> subject to this clause ask the customer for instructions for the credit or repayment of the amount. 		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances of overcharging identified. As a result, the requirements under Clause 30(1) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to notify customers and process refunds were not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> Complaints Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The customers who vacated the supply address were billed in accordance with the requirements. There were no complaints in relation to billing and vacating supply address.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
178 Type [2]	2022 Code of Conduct, CI 30(2) - If a retailer receives instruction under subclause 30(1), the retailer must deal with the amount overcharged in accordance with the customer's instructions within 12 business days after receiving the instructions.			<p>FINDING: The Licensee confirmed that during the audit period, there were no instances of overcharging identified, and therefore, no customer provided instructions regarding overcharged amounts. As a result, the requirement under Clause 30(2) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to process refunds or credits was not triggered and could not be assessed. As no payments required, there was no requirement for compliance with 12 business days.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Billing spreadsheet CRM Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> No instances of customer overcharging were recorded.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
179 Type [NR]	2022 Code of Conduct, CI 30(3) - If a retailer does not receive instructions under subclause 30(1) within 5 business days after making the request, the retailer must use reasonable endeavours to credit the amount overcharged to the customer's next bill.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances of overcharging identified. As a result, no customers were asked to provide instructions for handling overcharged amounts, and the requirement under Clause 30(3) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to credit unclaimed overcharges was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No instances requiring crediting of overcharged amounts to the next bill were identified. 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
180 [□] Type [NR]	2018 Code of Conduct, CI 4.18(6) - Where the amount overcharged is less than \$100, a retailer may proceed to deal with the matter as outlined in subclause 4.18(6).		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances of overcharging, including cases where the overcharged amount was less than \$100. As a result, the requirement under Clause 4.18(6) of the 2018 Code of Conduct for the Supply of Electricity to Small-Use Customers to process minor overcharges was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> No instances of customer overcharging were recorded.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
181 Type [NR]	2022 Code of Conduct, CI 30(6) - Despite subclauses 30(1) to (5), if a customer has been overcharged and the customer owes a debt to the retailer, the retailer may, after giving notice to the customer, use the amount of the overcharged to set-off the debt.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances of overcharging identified. As a result, the requirement under Clause 30(6) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to use overcharged amounts to set off a customer's outstanding debt was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Billing spreadsheet CRM Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> No customer debts were offset using overcharged amounts.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
181A + Type [NR]	2022 Code of Conduct, CI 30(7) - Subclause 30(6) does not apply if the customer is a customer experiencing financial hardship.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances of overcharging, and no customers classified as experiencing financial hardship. As a result, the requirement under Clause 30(7) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to prevent the set-off of overcharged amounts against debts for hardship customers was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee does not supply to residential customers, and this clause applies only to residential customers experiencing financial hardship. 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
181B + Type [NR]	2022 Code of Conduct, CI 30(8) - If there remains an amount in credit after a set-off under subclause 30(6), the retailer must deal with the amount in accordance with subclauses 30(1) to (4) (depending on the amount that remains in credit).		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances of overcharging and no cases where overcharged amounts were set off against outstanding debts. As a result, the requirement under Clause 30(8) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to handle remaining credit balances was not triggered and could not be assessed</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • CRM • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No instances of customer overcharging were recorded
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
182 [□] Type [2]	2018 Code of Conduct, CI 4.19(1) - If a retailer proposes to recover an amount of an adjustment which does not arise due to any act or omission of a customer, the retailer must comply with the requirements specified in subclause 4.19(1).		<p>FINDING: The Licensee confirmed that during the audit period (17/03/2022 – 20/02/2023), there were no instances where an adjustment was made that did not arise due to an act or omission of a customer. As a result, the requirement under Clause 4.19(1) of the 2018 Code of Conduct for the Supply of Electricity to Small Use Customers to recover such adjustments was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No recovery of adjustment amounts under this clause occurred.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
183 □ Type [NR]	2018 Code of Conduct, CI 4.19(2) - If the meter is read under either clause 4.6 or clause 4.3(2)(d), and the amount of the adjustment is an amount owing to the customer, the retailer must: <ul style="list-style-type: none"> • use its best endeavours to inform the customer within 10 business days; and • subject to subclauses 4.19(5) and 4.19(7), ask the customer for instructions about the repayment of the amount. 		FINDING: The Licensee confirmed that during the audit period, there were no instances where a meter reading under Clause 4.6 or Clause 4.3(2)(d) resulted in an adjustment amount owed to a customer. As a result, the requirement under Clause 4.19(2) of the 2018 Code of Conduct for the Supply of Electricity to Small-Use Customers to notify customers and seek repayment instructions was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Nil 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
183A + Type [2]	2022 Code of Conduct, CI 31(1) - If a customer requests the retailer to arrange for the preparation and issue of a final bill for the customer's supply address, the retailer must use its best endeavours to arrange for a meter reading and the preparation and issue of a final bill for the supply address in accordance with the customer's request.		FINDING: The Licensee confirmed that during the audit period, no customers requested the preparation or issuance of a final bill for their supply address. As a result, the requirement under Clause 31(1) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to arrange for a meter reading and issue a final bill was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • CRM • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No SUC final meter readings were arranged.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
183B + Type [2]	2022 Code of Conduct, CI 31(2) - Unless subclause 31(4) applies, if a customer's account is in credit at the time of the account closure, a retailer must, at the time of the final bill, ask the customer for instructions to transfer the credit amount either to another account the customer has or will have with the retailer, or a bank account nominated by the customer		<p>FINDING: The Licensee confirmed that during the audit period, no customers requested a final bill, and no accounts were closed. As a result, the requirement under Clause 31(2) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to ask customers for instructions regarding credit balances was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No customer final bill requests were recorded. • There were no customer complaints raised during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2024 - NIL			
183C + Type [2]	2022 Code of Conduct, CI 31(3) - The retailer must, in accordance with the customer's instructions under subclause 31(2), transfer the amount of the credit within 12 business days after receiving the instructions or another period agreed with the customer.		FINDING: The Licensee confirmed that during the audit period, no customers requested a final bill, and no accounts were closed. As a result, no credit balances required processing, and the requirement under Clause 31(3) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to transfer credit amounts was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample • PE Commercial Terms V2061 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • No customer final bill requests were recorded. • No credit balances requiring transfer were identified. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
183D + Type [2]	2022 Code of Conduct, CI 31(4) - If a customer's account is in credit at the time of account closure and the customer owes a debt to the retailer, the retailer may, after giving notice to the customer, use the credit to set-off the debt.		FINDING: The Licensee confirmed that during the audit period, no customers requested a final bill, and no accounts were closed. As a result, no credit balances or outstanding debts required set-off, and the requirement under Clause 31(4) of the 2022 Code of Conduct for	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			the Supply of Electricity to Small-Use Customers to apply credit balances against outstanding debts was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample • PE Commercial Terms V2061 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • No customer final bill requests were recorded. • No credit balances requiring transfer were identified.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
183E + Type [2]	2022 Code of Conduct, Cl 31(5) - If after a set-off under subclause 31(4), there remains an amount of credit, the retailer must deal with the amount in accordance with subclauses (2) and (3).		FINDING: The Licensee confirmed that during the audit period, no customers requested a final bill, and no accounts were closed. As a result, no credit balances or outstanding debts required set-off, and the requirement under Clause 31(5) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to handle remaining credit balances was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Perdaman Energy SUC Bill sample PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> No credit balances or outstanding debts requiring set-off were identified.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
184 □ Type [2]	2018 Code of Conduct, Cl 4.19(3) - If a retailer receives instructions under subclause 4.19(2), the retailer must pay the amount in accordance with the customer's instructions within 12 business days of receiving the instructions.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where a meter reading under Clause 4.6 or Clause 4.3(2)(d) resulted in an adjustment amount owed to a customer. As a result, no customer provided instructions regarding repayment, and the requirement under Clause 4.19(3) of the 2018 Code of Conduct for the Supply of Electricity to Small-Use Customers to process refunds was not triggered and could not be assessed. As no payments required, there was no requirement for compliance with 12 business days.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Billing spreadsheet CRM Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer observations for Obligation refer 182
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	2024 - NIL		
184A + Type [2]	2022 Code of Conduct, CI 32(1) - Despite any other arrangement or agreement that may be in place between the retailer and the customer in relation to paying bills, the retailer must allow the customer who has entered into a standard form contract to choose to receive bills, by post as paper bills or by email sent to an email address provided by the customer.		<p>FINDING: The Licensee confirmed that during the audit period, there were no customers on a Standard Form Contract (SFC). As a result, the requirement under Clause 32(1) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to provide customers the option of receiving bills by post (paper bills) or email was not applicable and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample • ERA website • Perdaman Energy Standard Form Contract <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • All customers were on fixed term Non-Standard Contracts.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
185 □ Type [NR]	2018 Code of Conduct, CI 4.19(4) - If a retailer does not receive instructions under subclause 4.19(2), within 5 business days of making the request, the retailer must use reasonable endeavours to credit the amount of the adjustment to the customer's account.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where a meter reading under Clause 4.6 or Clause 4.3(2)(d) resulted in an adjustment amount owed to a customer. As a result, no customer instructions for repayment were required, and the requirement under Clause 4.19(4) of the 2018 Code of Conduct for the Supply of Electricity to Small-Use Customers to credit the adjustment to the customer's account was not triggered and could not be assessed</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer observations for Obligation refer 182
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
186 □ Type [NR]	2018 Code of Conduct, CI 4.19(7) - A retailer may, after notifying the customer in writing, use an amount of an adjustment to set off that customer's debt owed to the retailer, provided that the customer is not a residential customer in payment difficulties or financial hardship. If, after the set off, there remains an amount of credit, the retailer must deal with that amount in accordance with subclause 4.19(2) or, if the amount is less than \$100, subclause 4.19(5).		<p>FINDING: The Licensee confirmed that for the duration of the audit period applicable, there were no adjustments owing to the customer, or where the customer owed a debt to the retailer. As such requirements relating to offset of debt or credits were not applicable.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted the Licensee does not have any residential customers. As such the assessment for experiencing payment difficulties or financial hardship was not applicable. • As no payments required, there was no requirement for compliance.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2024 - NIL			
PAYMENT				
187 Type [2]	2022 Code of Conduct, CI 93 - The date by which a bill must be paid must not be earlier than 12 business days from the bill issue date.		FINDING: The Licensee confirmed that during the audit period, all invoices reviewed complied with Clause 93 of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers, ensuring that the due date for bill payments was not earlier than 12 business days from the bill issue date DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample • Billing spreadsheet • CRM PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Samples of SUC estimated bills were provided for review. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
188 Type [2]	2022 Code of Conduct, CI34(1) - A retailer must accept payment for a bill prescribed in subclause 34(1).		FINDING: The Licensee confirmed that for the duration of the audit period, that the 2018 and 2022 Code of Conduct provided for the option for Perdaman Energy to contractually agree to payment methods. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy SUC Bill sample 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Commercial Terms section 5.4 specified methods of payment would be detailed on the invoices. • All payment methods were specified on SUC invoices reviewed. • The Licensee confirmed there were no requests by the SUC for in person payment. • The Licensee did not supply to residential customers as such Centrepay payment options were not applicable.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
189 □ Type [2]	2018 Code of Conduct, CI 5.3 - Prior to commencing a direct debit facility, a retailer must obtain a customer's verifiable consent and agree with the customer the date of commencement of the facility and the frequency of the direct debits.		<p>FINDING: The Licensee confirmed that during the audit period, direct debit was available as a payment option; however, no SUC customers elected to use it. As a result, the requirement under Clause 5.3 of the 2018 Code of Conduct for the Supply of Electricity to Small-Use Customers to obtain verifiable consent and agree on the commencement date and frequency was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Nil
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
190 Type [2]	2022 Code of Conduct, CI 95(1) to (3) - A retailer must accept payment in advance from a customer. This will not require a retailer to credit any interest to the amounts paid in advance. The amount of \$20 is the minimum amount a retailer is required to accept from a customer (although a retailer may accept lower amount if it thinks fit).		<p>FINDING: The Licensee confirmed that during the audit period, no customers requested to make advance payments toward their electricity bills. As a result, the requirement under Clause 95(1) to (3) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to accept and process advance payments was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Billing spreadsheet CRM PE Commercial Terms V2061 Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> No records of advance payments were reflected on invoices reviewed.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
190A + Type [2]	2022 Code of Conduct, CI 95(4) to (6) - A retailer may determine an amount (a maximum credit amount) that a customer's account may be in credit and must publish the maximum credit amount on its website. The maximum credit amount must not be less than \$100.		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not determine a maximum credit amount and as such compliance with the requirements in relation to publishing on their website were not required. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample • Perdaman Energy website PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
191A + Type [2]	2022 Code of Conduct, CI 36 - A retailer must redirect a customer's bill to a different address (including an email address or a different email address) on the customer's request and at no charge.		FINDING: The Licensee confirmed that during the audit period, at no charge customers invoices were redirected as requested for their bills to a different email address designated for accounts receival. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Perdaman Energy - Electricity Supply Agreement <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> It was noted the ESA agreement contained the contact details and the billing systems were updated to reflect the request.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
197 Type [2]	2022 Code of Conduct, CI 38(1) - A retailer must not require a customer, who has vacated a supply address, to pay for electricity consumed at the customer's supply address in the circumstances specified in subclause 38(1).		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where a customer vacated a supply address. As a result, the requirement under Clause 38(1) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to ensure that customers were not charged for electricity after vacating was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Billing spreadsheet CRM PE Commercial Terms V2061 Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Nil
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
198 Type [2]	2022 Code of Conduct, CI 38(2) - If a customer reasonably demonstrates to a retailer that the customer was evicted or otherwise required to vacate the supply address, the retailer must not require the customer to pay for electricity consumed at that supply address from the date the customer gave the notice to the retailer.		FINDING: The Licensee confirmed that during the audit period, there were no instances where a customer was evicted or otherwise required to vacate a supply address. As a result, the requirement under Clause 38(2) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers to cease charging for electricity from the notice date was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
199 Type [2]	2022 Code of Conduct, CI 38(4) - Despite subclauses 38(1) and (2), a retailer must not require a previous customer to pay for electricity consumed at the supply address in the circumstances specified in subclause 38(4).		FINDING: The Licensee confirmed that during the audit period, there were no instances where a previous customer was billed for electricity consumed at a supply address after they had vacated. As a result, the requirement under Clause 38(4) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • No customers vacated a supply address during the audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
201 Type [2]	2022 Code of Conduct, CI 39(2) - A retailer must not recover, or attempt to recover, a debt from a person relating to a supply address other than the customer who the retailer has, or had, entered into a contract for the supply of electricity to that supply address.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where a debt was recovered or attempted to be recovered from a person other than the contracted customer for the supply address. As a result, the requirement under Clause 39(2) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
201A Type [NR]	2022 Code of Conduct, CI 39(3) - A retailer may transfer one customer's debt to another customer if requested by the customer owing the debt, if the retailer obtains the other customer's verifiable consent to the transfer.		FINDING: The Licensee confirmed that during the audit period, no customers requested a debt transfer to another customer, and no such transfers were processed. As a result, the requirement under Clause 39(3) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
PAYMENT ASSISTANCE				
228 Type [2]	2022 Code of Conduct, CI 47 - A retailer must consider any reasonable request for alternative payment arrangements from a business customer who is experiencing payment difficulties.		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not requested to consider alternative payment arrangements from a business customer. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • SUC Sample Bills PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS:
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
DISCONNECTION			
229 Type [2]	2022 Code of Conduct, CI 48 - Before arranging for a disconnection of a customer's supply address for failure to pay a bill, a retailer must give the customer a written notice (a reminder notice), which contains the information specified in subclause 48(1)(a), not less than 15 business days from the dispatch date of the bill. The retailer must use its best endeavours to contact the customer to advise of the proposed disconnection and give the customer a disconnection warning, in the manner and timeframes specified in subclause 48(1)(c).		FINDING: The Licensee confirmed that during the audit period, there were no instances where a customer's supply address was disconnected due to non-payment of a bill. As a result, the requirement under Clause 48 of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Specified in clause 6.4 of Perdaman Energy Commercial Terms for Electricity Supply – V2061
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
230 Type [2]	2022 Code of Conduct, CI 49(a) - A retailer must not arrange for a disconnection of a customer's supply address for failure to pay a bill in the circumstances specified in subclause 49(a).		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where a customer's supply address was disconnected due to non-payment of a bill. As a result, the requirement under Clause 49(a) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers, which prohibits disconnection in certain circumstances, was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Nil 	
	PRIORITY - 4	CONTROLS RATING – NP		COMPLIANCE RATING - NR
	2024 - NIL			
232 Type [2]	2022 Code of Conduct, CI 51(2) - If the conditions specified in subclause 51(1) are satisfied, a retailer may arrange for the disconnection of a customer's supply address for denying access to the meter.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where a customer's supply address was disconnected due to denial of meter access. As a result, the requirement under Clause 51(2) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers was not triggered and could not be assessed.</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The licensee has established control procedures in relation to disconnection for denying access to meter. There was no requirement to reference the procedures.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
232A + Type [2]	2022 Code of Conduct, Cl 51(4) - A retailer may arrange for the disconnection of a customer's supply address if the customer has not provided the safe access to the customer's supply address for the purposes of testing, maintaining, inspecting, altering or replacing a meter, or checking the accuracy of the customer's consumption at the supply address.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not arrange disconnection a customer's supply address for denying access to the meter.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	OBSERVATIONS: • Nil
	2024 - NIL			
234 Type [1]	2022 Code of Conduct, CI 52 - Subject to subclause 52(3), a retailer or distributor must comply with the limitations specified in subclauses 52(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.			FINDING: The Licensee confirmed that during the audit period, there were no instances of disconnection for any customer, including no Small-Use Customers (SUC), no life support customers, and no residential customers. As a result, the requirement under Clause 52 of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers, which limits the conditions under which disconnections can occur, was not triggered and could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Note there were no small use customers registered for life support during the audit period.
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - NR	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
235 □ Type [1]	2018 Code of Conduct, CI 7.7(1) - If a customer provides a retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the customer’s supply address requires life support equipment, the retailer must comply with subclause 7.7(1).		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not have any small use customers registered for life support equipment. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy - Electricity Supply Agreement PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • No SUC customers were classified as life support customers. • The Licensee had established control process for LUC customers requiring life support. 	
	PRIORITY - 2	CONTROLS RATING - A		COMPLIANCE RATING - NR
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
236 [□] Type [1/2]	2018 Code of Conduct, CI 7.7(2) - A retailer must undertake the actions specified in subclauses 7.7(2)(e)-(g), if a customer registered with a retailer under subclause 7.7(1) notifies the retailer: <ul style="list-style-type: none"> • that the person requiring life support equipment is changing supply address; • that the customer, but not the person requiring life support equipment, is changing supply address; • of a change in contact details; or • that the address no longer requires registration as life support equipment address. 		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not have any small use customers registered for life support equipment. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy - Electricity Supply Agreement PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • There were no SUC customers requiring life support. For LUC details were maintained in a life support register which was cross checked with contract details, email communication with Western Power. They were noted to be LUCs. • The control procedures were well established in relation to training, documentation and verified communication with Western Power in relation to the large use life support customer. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
240 [□] Type [2]	2018 Code of Conduct, CI 7.7(6) - A retailer must contact the customer to ascertain whether life support equipment is required or to request re-certification in the timeframe, manner and circumstances specified in subclause 7.7(6).		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not have any small use customers registered for life support equipment. It was noted any customers requiring registration as life support equipment at the supply address were large use customers. DOCUMENTS/SYSTEMS:	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy - Electricity Supply Agreement <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer observations obligation 236.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
241 □ Type [2]	2018 Code of Conduct, CI 7.7(7) - A retailer or a distributor must remove the customers' details from the life support equipment register in the circumstances and timeframes specified in subclause 7.7(7).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy's customers requiring registration as life support equipment at the supply address were large use customers and not small use customers.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy - Electricity Supply Agreement <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer observations obligation 236.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2024 - NIL			
RECONNECTION				
242 Type [2]	2022 Code of Conduct, CI 53(2) - A retailer must arrange to reconnect a customer's supply address if the customer rectified the matter that led to the disconnection or made arrangements to the satisfaction of the retailer, makes a request for reconnection and pays the retailer's reasonable charges (if any) for reconnection, or enters into a payment plan for the charges.		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where a customer's supply address was disconnected, and therefore, no reconnections were required. As a result, the requirement under Clause 53(2) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample • WP Web Portal • Complaints Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that a retailer must arrange to reconnect a customer's supply address if the customer rectified the matter that led to the disconnection, requested the reconnection and made arrangements as required (i.e., entered into a payment plan for the charges). 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
243 Type [2]	2022 Code of Conduct, CI 53(3) - A retailer must forward the request for reconnection to the distributor within the timeframes specified in subclause 53(3).		<p>FINDING: The Licensee confirmed that during the audit period, there were no instances where a customer’s supply address was disconnected, and therefore, no requests for reconnection were received or required to be forwarded to the distributor. As a result, the requirement under Clause 53(3) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers was not triggered and could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • PE Commercial Term V2061 • WP Web Portal • CRM <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
INFORMATION & COMMUNICATION				
271D + Type [2]	2022 Code of Conduct, CI 68(1) - The retailer must publish on its website the information detailed in subclause 68(1).		<p>FINDING: The Licensee confirmed that during the audit period, and as reflected in the Audit Register, the Licensee did not publish all the required general information on its website, specifically:</p> <ul style="list-style-type: none"> • (e) A summary of the retailer’s complaints and dispute resolution procedures. • (f) The contact details for the electricity industry ombudsman. 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>As a result, the requirement under Clause 68(1) of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers was not fully met.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy website • ERA website • Ombudsman website • Email to small use customer 14/06/2022 • PE Small-Use Customer Pack V2021 • Complaints Register • PE Audit Register • 2023 Annual Compliance Report <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that the Licensee did not supply electricity to residential customers and as such was not required to publish; information about concessions; a hardship policy; or a family violence policy. • The relevant people within Perdaman Energy have been notified. The information was noted to be up on the website on 13/9/24.
	PRIORITY - 4	CONTROLS RATING - B	COMPLIANCE RATING – 2
	<p>10/2024 RECOMMENDATION - The relevant people within Perdaman Energy have been notified to rectify the website deficiency, and the missing information was published on the retailer's website on 13/09/2024. To ensure ongoing compliance the Licensee should:</p>		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS												
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS									
	<table border="1"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>10/2024-1</td> <td>Establish effective internal audit process to ensure ongoing compliance</td> <td>Clause 68(1)</td> </tr> <tr> <td>10/2024-2</td> <td>Report the non-compliance in the 2025 Annual Compliance report</td> <td>Obligation 124</td> </tr> </tbody> </table>		Ref	Recommendation	Regulation Addressed	10/2024-1	Establish effective internal audit process to ensure ongoing compliance	Clause 68(1)	10/2024-2	Report the non-compliance in the 2025 Annual Compliance report	Obligation 124	
Ref	Recommendation	Regulation Addressed										
10/2024-1	Establish effective internal audit process to ensure ongoing compliance	Clause 68(1)										
10/2024-2	Report the non-compliance in the 2025 Annual Compliance report	Obligation 124										
271E + Type [2]	2022 Code of Conduct, CI 68(3) - If a customer requests information of the kind referred to subclause 68(1) the retailer must refer the customer to the retailer’s website or provide the information to the customer without charge.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy provided the applicable information referred to in subclause (1) free of charge to the customer.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Email to small use customer 14/06/2022 • PE Small-Use Customer Pack V2021 • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • There were no specific requests made by the customer as information was routinely provided as part of the ESA process. 									
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR									
	2024 - NIL											
271F + Type [2]	2022 Code of Conduct, CI 68(4) - If a customer requests a copy of information of the kind referred to in subclause 68(1), the retailer must provide a copy of the information to the customer without charge.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not requested to provide a copy of the applicable information referred to in subclause (1) to the customer.</p>									

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy website • Email to small use customer 14/06/2022 • PE Small-Use Customer Pack V2021 • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
272 [□] Type [2]	2018 Code of Conduct, CI 10.1(1) - A retailer must give notice of any variations in its tariffs, fees and charges, to each of its customers affected by the variation no later than the next bill in the customer's billing cycle.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy that customers were advised of any tariff variations no later than the next bill per billing processes.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy SUC Invoices • Email to small use customer 14/06/2022 • PE Small-Use Customer Pack V2021 • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Licensee confirmed notices were sent annually in July, for example CPI increase and Western Power tariff price increases if applicable
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2024 - NIL			
273 Type [2]	2022 Code of Conduct, CI 69 - On request and at no charge, a retailer must give or make available to a customer reasonable information on its tariffs, fees or charges, including any alternative tariffs that may be available to that customer.		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy they did not receive specific requests to provide information on its tariffs, fees and charges. It was confirmed by Perdaman Energy that they did not charge for the requests, and they did not offer alternative tariffs. This was noted to be consistent with the Commercial Terms. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • CRM • Perdaman Energy SUC Bill sample • PE Commercial Terms V2061 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Nil. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
274 [□] Type [2]	2018 Code of Conduct, CI 10.1(3) - A retailer must give or make available to a customer the information requested on tariffs, fees and charges within 8 business days of the date of receipt and, if requested, provide the information in writing.		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not requested to provide information on tariffs, fees and charges. Compliance with the 8 business could not be assessed. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Sample Customer Folders • Perdaman Energy SUC Bill sample 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee’s general policy was to communicate this information via email. • It was noted customer queries were responded to promptly and the Licensee engaged in regular communication with its SUC.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
274A + Type [2]	2022 Code of Conduct, CI 71(2) - If a customer’s tariffs, fees or charges are not regulated or set by the State Government, a retailer must give notice to a customer of any variation to its tariffs, fees or charges, that affects the customer in the manner specified in subclauses 71(3) and (4).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy gave notice to customers of any variation to its tariffs, fees or charges, that affected the customer in the manner specified in subclauses 71(3) and (4).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • CRM • Perdaman Energy SUC Bill sample <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's customers tariffs, fees or charges were not regulated or set by the State Government.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS									
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS						
280 Type [2]	2022 Code of Conduct, CI 73 - At least once a year, a retailer must provide a customer with written details of the retailer's and distributor's obligations to make payments to the customer under Part 14 or under any other written law, including the amount of the payment and the eligibility criteria for the payment.		<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy did not provide customers with written details of its obligations to make service standard payments under Part 14 of the Code or any other written law. As a result, the requirement under Clause 73 of the 2022 Code of Conduct for the Supply of Electricity to Small-Use Customers was not met.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Billing spreadsheet • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample • PE Audit Register <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • During the audit period, Perdaman Energy did not have a documented process for issuing these notices annually. 						
	PRIORITY - 4	CONTROLS RATING – B	COMPLIANCE RATING - 2						
	<p>11/2024 RECOMMENDATION - Perdaman Energy did not provide the customer with written details of our obligations to make payments to the customer under Part 14 of the Code. To ensure compliance with this requirement, the Licensee should:</p> <table border="1"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>11/2024-1</td> <td>Implement a process to ensure annual written notification is provided to customers regarding service standard payments, including the amount of the payment and eligibility criteria.</td> <td>Clause 73</td> </tr> </tbody> </table>			Ref	Recommendation	Regulation Addressed	11/2024-1	Implement a process to ensure annual written notification is provided to customers regarding service standard payments, including the amount of the payment and eligibility criteria.	Clause 73
Ref	Recommendation	Regulation Addressed							
11/2024-1	Implement a process to ensure annual written notification is provided to customers regarding service standard payments, including the amount of the payment and eligibility criteria.	Clause 73							

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
		It was noted that although outside the audit period, the Licensee has captured this action in their Audit Register, to ensure notification will be sent to customers with their Welcome Pack and renewal offer and will also be included in their July invoice each year, aligning with other key notices (e.g., CPI increase, Western Power tariff updates)	
	11/2024-2	Ensure the non-compliance is reported in the 2025 Annual Compliance Report	Obligation 124
281 [□] Type [2]	2018 Code of Conduct, CI 10.4 - On request and at no charge, a retailer must give, or make available to, a customer general information on cost effective and efficient ways to utilise electricity; and the typical running costs of major domestic appliances.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not receive any requests from customers related to general information on cost effective and efficient ways to utilise electricity; and the typical running costs of major domestic appliances.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy website • ERA website • PE Customer Pack • CRM • PE Commercial Terms V2061 • Email to small use customer 14/06/2022 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			OBSERVATIONS: • The required information was included on the Licensee's website, control procedures and contract documentation.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
282 Type [2]	2022 Code of Conduct, CI 74 - If asked by a customer for information relating to the distribution of electricity, a retailer must give the information to the customer or refer the customer to the distributor for a response.		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not receive any requests from customers related to the distribution of electricity. As such, the Licensee did not refer the customer to the relevant distributor for a response. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy website • ERA website • PE Customer Pack • CRM • PE Commercial Terms V2061 • Email to small use customer 14/06/2022 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • The Licensee has developed procedures to record occurrences. • It was noted the CRM which had capability to record outgoing emails against client and log call information was no longer being utilised by the Licensee.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
290 Type [NR]	2022 Code of Conduct, CI 77 - To the extent practicable, a retailer or distributor must ensure that any written information that must be given to a customer by the retailer or distributor or its electricity marketing agent under the Code of Conduct is expressed in clear, simple, concise language and in a format that is easy to understand.		FINDING: A sampled review of the documentation provided by the Licensee during the audit period confirmed, Perdaman Energy’s processes provided for written information to be expressed in clear, simple, concise language and in a format that was easy to understand. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy website • Perdaman Energy - Electricity Supply Agreement • Email to small use customer 14/06/2022 • PE Customer Pack • CRM • PE Commercial Terms V2061 • Perdaman Energy SUC Bill sample PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Examples of documentation reviewed included ESAs, Commercial terms, bills, emails, website information etc. Specific document references are detailed for each obligation and referenced in Appendix 2 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
291 [□] Type [2]	2018 Code of Conduct, CI 10.10(1) - On request, a retailer and a distributor must inform a customer how to obtain a copy of the Code of Conduct.		FINDING: During the audit period the Licensee confirmed, Perdaman Energy did not receive any requests on how to obtain a copy of the Code of Conduct. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy website • Privacy Policy 	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • PE Customer Pack • CRM • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • It was noted that reference to this obligation was contain in the Commercial Terms. Customer Packs and was linked via Perdaman Energy website.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
292 [□] Type [2]	2018 Code of Conduct, CI 10.10(2) - A retailer and distributor must make electronic copies of the Code of Conduct available on their websites, at no charge.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, and a review of Perdaman Energy's website verified the Code of Conduct was available on their websites, at no charge.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy website • ERA website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee indicated that during the audit period there was one instance noted where the website was not operational, and it was corrected within 30 minutes of identifying the problem. There were no customer complaints raised in relation to the technical issue. • The link connects to the ERA website as a source for the Code of Conduct.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS

No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
297 Type [2]	2022 Code of Conduct, CI 79(2) - On request, a retailer must advise a customer of the availability of different types of meters or refer the customer to the distributor for a response.			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not receive any requests from customers related to the availability of different types of meters or refer the customer to the relevant distributor for a response.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • CRM • Perdaman Energy website • PE Commercial Terms V2061 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
2024 - NIL				
LIFE SUPPORT SCHEME				
297B + Type [1]	2022 Code of Conduct, CI 82(2) - If a customer provides the retailer with confirmation from an appropriately qualified medical practitioner that a person residing at the customer's supply address requires life support equipment, the retailer must, in accordance with the relevant standard, register the customer's supply address as a life support equipment address, register a person's contact details, as prescribed under subclause 82(6) in relation to the supply address and provide that information to the distributor.			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to undertake the registration of life support equipment address for a small use customer.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy 2023 Electricity Performance Reporting Datasheet • WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - NR	<ul style="list-style-type: none"> The Licensee confirmed Life Support registration processes were established, and control procedures developed for the LUC requiring life support.
	2024 - NIL			
297C + Type [2]	2022 Code of Conduct, CI 82(3) - A retailer must provide the information detailed under subclause 82(3) to the customer within 5 days after registering the customer's supply address as a life support equipment address.			<p>FINDING: Refer obligation 297B.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Perdaman Energy 2023 Electricity Performance Reporting Datasheet <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer to obligation 297B
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
297D + Type [1/210]	2022 Code of Conduct, CI 82(5) - If a customer, for a supply address registered under subclause 82(2), notifies the retailer that the person residing at the customer's supply address who requires life support equipment is changing supply address, or that the customer is changing supply address but not the person who requires life support equipment, or that there has been a change in contact details, then the retailer must, in accordance with the relevant standard,			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to register a change in relation to a SUC for life support equipment address.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Standard Form Electricity Contract Perdaman Energy 2023 Electricity Performance Reporting Datasheet WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p>
	a. register the change and			
	b. provide a notification to the distributor of the change.			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 2	CONTROLS RATING - A	COMPLIANCE RATING - NR	<ul style="list-style-type: none"> The Life Support registration processes were established, and control procedures developed for LUC requiring life support.
	2024 - NIL			
297H + Type [2]	2022 Code of Conduct, CI 85(1) - A retailer must confirm periodically the information held in relation to the life-support equipment scheme is/has not changed in the manner prescribed under subclause 85(1).			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to undertake a periodic review, as prescribed under subclause 85(1), in relation to a SUC for life support equipment address.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Standard Form Electricity Contract Perdaman Energy 2023 Electricity Performance Reporting Datasheet WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The Licensee confirmed Life Support periodic review processes were established, and control procedures developed for the LUC requiring life support.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
297I + Type [2]	2022 Code of Conduct, CI 85(2) - A retailer must allow a customer at least 3 months to respond to the notice requesting confirmation of the information held in relation to the life-support equipment scheme and warn the customer of supply address de- registration from the life-support equipment scheme and details of resulting de-registration as prescribed under subclause 85(2).			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to undertake a periodic review, as prescribed under subclause 85(2), in relation to a SUC for life support equipment address.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Standard Form Electricity Contract

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Perdaman Energy 2023 Electricity Performance Reporting Datasheet WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The Licensee confirmed Life Support periodic review and de-registration processes were established, and control procedures developed for the LUC requiring life support.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
297J + Type [2]	2022 Code of Conduct, Cl 86(2) - If a retailer is notified that a customer's supply address no longer requires registration as a life support equipment address, the retailer must de-register the address as prescribed in subclause 86(2).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to de-register a SUC for life support equipment address. As such, compliance with the requirements as prescribed under subclause 86(2) could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Standard Form Electricity Contract Perdaman Energy 2023 Electricity Performance Reporting Datasheet WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The Licensee Confirmed Life Support de-registration processes were established, and control procedures developed for the LUC requiring life support.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
297K + Type [2]	2022 Code of Conduct, CI 86(3) and (4) - If a customer fails to comply with a notice from the retailer under clause 85, in relation to a life support equipment address, within the period allowed under clause 85(2)(a), then the retailer must undertake action prescribed in subclauses 86(3) and 86(4).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to de-register a SUC for life support equipment address. As such, compliance with the requirements as prescribed under subclause 86(3) and 86(4) could not be assessed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Standard Form Electricity Contract • Perdaman Energy 2023 Electricity Performance Reporting Datasheet • WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer obligation observations 297(J). 	
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
297L + Type [2]	2022 Code of Conduct, CI 86(6) - A retailer must, when it de-registers a life support equipment address, provide the customer's distributor with a notification about the de-registration as detailed under subclause 86(6)		<p>FINDING: Refer to finding obligation 297(K).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Refer to documents and systems obligation 297(K). <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Refer obligation observations 297(K). 	
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
297N + Type [2]	2022 Code of Conduct, CI 86(8) - Despite subclauses 86(1) to (7), a supply address must not be de-registered if the retailer is aware that another person residing at the supply address still requires life support equipment.		FINDING: Refer to finding obligation 297(K). DOCUMENTS/SYSTEMS: • Refer to documents and systems obligation 297(K). PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • Refer obligation observations 297(K).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
298 Type [2]	2022 Code of Conduct, CI 87(1) - Each retailer and distributor must develop, maintain and implement a standard complaint and dispute resolution procedure.		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy developed, maintained and implemented their Complaints Handling process. DOCUMENTS/SYSTEMS: • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Complaints Register • Perdaman Energy Customer Invoices • Perdaman Energy website PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • It was noted the Licensee's complaints handling register was reviewed and there were no complaints received during the current audit period.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
299 Type [2]	2022 Code of Conduct, CI 87(2) - The standard complaints and dispute resolution procedure under subclause 87(1) must comply with the requirements specified in subclauses 87(2)(a), (b), (c) and (d).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, 17/3/2022 to 31/3/2024, Perdaman Energy's internal process for handling complaints and resolving disputes complied with AS ISO 10002-2014. This was stated in the PE Small Use Customer Pack and on the website. However, the Complaints Handling Process did not adequately address the compliance requirements for clause 87(2)(b)(ii)(c) and (d).</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Complaints Register • Perdaman Energy Small-Use Customer Pack • Perdaman Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee's complaints handling procedure under subclause 87(1) complied with the requirements specified in subclauses 87(2)(a), (b)(i), (c) and (d). • However, a review of the reference on the Perdaman Energy website relating to escalation rights for customers to more specifically convey the right to request a review by a senior employee. (i.e. https://www.perdamanenergy.com.au/customer-service currently states “If you are unhappy with our response, you can make a complaint to a higher level within our organisation.”) • The complaints process for managing complaints about brokers was included in the Licensees documentation.
	PRIORITY - 4	CONTROLS RATING - B	COMPLIANCE RATING - 2
			Noted that the Small Use Customer Pack referred to a Complaints Policy however this was not provided for review.

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS

No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION	FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS																		
	<p>12/2024 RECOMMENDATION: Review and update the complaints handling policy to explicitly meet all requirements under Clause 87(2), ensuring it includes:</p> <table border="1" data-bbox="392 486 1836 917"> <thead> <tr> <th>Ref</th> <th>Recommendation</th> <th>Regulation Addressed</th> </tr> </thead> <tbody> <tr> <td>12/2024-1</td> <td>Review the complaints process to ensure the information that will be provided to a customer, including in accordance with the requirements under clause 89.</td> <td>Clause 87(2)(b)(ii) and Clause 89</td> </tr> <tr> <td>12/2024-2</td> <td>Review the complaints process to ensure response times for complaints are addressed.</td> <td>Clause 87(2)(c)</td> </tr> <tr> <td>12/2024-3</td> <td>Review the complaints process to ensure the method of response is addressed.</td> <td>Clause 87(2)(d)</td> </tr> <tr> <td>12/2024-4</td> <td>Review the definition of a complaint as detailed in the S3.2 Distinguishing 'complaints' from 'queries' of the Customer Complaint Guidelines – October 2016 approved by the ERA to ensure the Complaints Handling Procedure complies.</td> <td>2018 Code of Conduct, CI 12.2 (note obsolete requirement)</td> </tr> <tr> <td>12/2024-5</td> <td>Ensure the non-compliance is reported in the 2025 Annual Compliance Report</td> <td>Obligation 124</td> </tr> </tbody> </table>	Ref	Recommendation	Regulation Addressed	12/2024-1	Review the complaints process to ensure the information that will be provided to a customer, including in accordance with the requirements under clause 89.	Clause 87(2)(b)(ii) and Clause 89	12/2024-2	Review the complaints process to ensure response times for complaints are addressed.	Clause 87(2)(c)	12/2024-3	Review the complaints process to ensure the method of response is addressed.	Clause 87(2)(d)	12/2024-4	Review the definition of a complaint as detailed in the S3.2 Distinguishing 'complaints' from 'queries' of the Customer Complaint Guidelines – October 2016 approved by the ERA to ensure the Complaints Handling Procedure complies.	2018 Code of Conduct, CI 12.2 (note obsolete requirement)	12/2024-5	Ensure the non-compliance is reported in the 2025 Annual Compliance Report	Obligation 124	<p>12/2024 RECOMMENDATION: Review and update the complaints handling policy to explicitly meet all requirements under Clause 87(2), ensuring it includes:</p>
Ref	Recommendation	Regulation Addressed																		
12/2024-1	Review the complaints process to ensure the information that will be provided to a customer, including in accordance with the requirements under clause 89.	Clause 87(2)(b)(ii) and Clause 89																		
12/2024-2	Review the complaints process to ensure response times for complaints are addressed.	Clause 87(2)(c)																		
12/2024-3	Review the complaints process to ensure the method of response is addressed.	Clause 87(2)(d)																		
12/2024-4	Review the definition of a complaint as detailed in the S3.2 Distinguishing 'complaints' from 'queries' of the Customer Complaint Guidelines – October 2016 approved by the ERA to ensure the Complaints Handling Procedure complies.	2018 Code of Conduct, CI 12.2 (note obsolete requirement)																		
12/2024-5	Ensure the non-compliance is reported in the 2025 Annual Compliance Report	Obligation 124																		
<p>299A + Type [2]</p>	<p>2022 Code of Conduct, CI 87(3) - The standard complaints and dispute resolution procedure must comply with AS/NZS 10002:2014</p>	<p>FINDING: The Licensee confirmed that for the duration of the audit period, 17/3/2022 to 31/3/2024, Perdaman Energy's internal process for handling complaints and resolving disputes complied with AS ISO 10002-2014. This was stated in the PE Small Use Customer Pack and on the website.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Complaints Register • Perdaman Energy Customer Invoices 																		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Perdaman Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The complaints handling procedure was stated in the PE Small Use Customer Pack and on the website.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
300 □ Type [2]	2018 Code of Conduct, CI 12.1(3) - A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy' complaint processes and procedures confirmed the customer's right to escalate the complaint to a senior officer for review or to the Energy and Water Ombudsman in accordance with complaints procedure was specified. The Licensee's bills referenced the Energy and Water Ombudsman contact details.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Perdaman Energy Commercial Terms for Electricity Supply – V2061 Complaints Register Perdaman Energy Customer Invoices Perdaman Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Sample bills reviewed confirmed free call number of Energy and Water Ombudsman.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
301 Type [2]	2022 Code of Conduct, CI 88 - On receipt of a written complaint by a customer, a retailer or distributor must acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not receive a written complaint by a customer, a retailer or a distributor. As such assessment of compliance with the obligation cannot be made. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Complaints Register • Perdaman Energy Customer Invoices • Perdaman Energy website PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • The complaints register was reviewed and verified compliance. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
301A + Type [2]	2022 Code of Conduct, CI 89 - A retailer or distributor must inform the customer of the outcome of a complaints process and, unless the customer has advised the retailer or distributor that the complaint has been resolved in a manner acceptable to the customer, information as detailed in 89(b)(i) to (iii).		FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy did not receive any customer complaints and as such assessment of compliance with the requirements relating to advice about the outcome of complaint could not be undertaken. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Complaints Register • Perdaman Energy Customer Invoices • Perdaman Energy website PERSONNEL INTERVIEWED:	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> It was noted the complaints handling process ensured the Licensee: <ul style="list-style-type: none"> (a) informed the customer of the outcome of a complaints process; and (b) unless the customer advised that the complaint had been resolved in a manner acceptable to the customer, informed the customer — <ul style="list-style-type: none"> (i) of the reasons regarding the outcome; and (ii) that if the customer was not satisfied with the outcome, the customer may make a complaint or take a dispute to the electricity industry ombudsman; and (iii) provided the contact details for the electricity industry ombudsman.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
302 □ Type [2]	2018 Code of Conduct, CI 12.2 - A retailer must comply with any guideline developed by the ERA to distinguish customer queries from complaints.		<p>FINDING: The Licensee confirmed that during the applicable audit period (17/03/2022 – 20/02/2023), Perdaman Energy did not comply with the Customer Complaint Guidelines – October 2016 approved by the Economic Regulation Authority (ERA). Specifically, the distinction between customer complaints and queries was not explicitly applied within the customer complaint handling process.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> Perdaman Energy Commercial Terms for Electricity Supply – V2061

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			<ul style="list-style-type: none"> • Customer Complaint Guidelines – October 2016 • Complaints Register • Perdaman Energy Customer Invoices • Perdaman Energy website <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Licensee confirmed they were in regular communication with their small use customer during the audit period. • The complaints register did not reflect the distinction between complaints and queries.
	PRIORITY - 4	CONTROLS RATING - A	COMPLIANCE RATING - 2
<p>13/2024 RECOMMENDATION: While the Licensee did not comply with Clause 12.2 during the audit period, the requirement was removed in the 2022 Code of Conduct amendment, effective 20/02/2023. As such, no further recommendations are necessary. However, the complaint handling process should continue to align with obligation 299 to ensure that customer complaints are consistently categorised and handled in compliance with current regulatory requirements.</p>			
303 [□] Type [2]	2018 Code of Conduct, CI 12.3 - On request and at no charge, a retailer, distributor and electricity marketing agent must give a customer information that will assist the customer to utilise the respective complaints handling processes.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, as part of the customer contracts process, Perdaman Energy provided customers information that would assist the customer to utilise the respective complaints handling processes. There was no specific customer request received to provide this information.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Complaints Register • Perdaman Energy Customer Invoices
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING – NR
			<ul style="list-style-type: none"> • Email to small use customer 14/06/2022 • Perdaman Energy website

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • There was no charge for information that assisted the customer in utilising the respective complaints handling processes. • Information was accessible on the PE Small-Use Customer Pack, invoices and the website.
	2024 - NIL			
304 Type [2]	2022 Code of Conduct, CI 90 - If a retailer, distributor or electricity marketing agent receives a complaint from a customer that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be appropriate to deal with the complaint (if known).			FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy had established controls to refer any complaints from customers that did not relate to its functions. There were no specific requests to provide such information during the audit period. DOCUMENTS/SYSTEMS: • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • Complaints Register • Perdaman Energy Customer Invoices • Perdaman Energy website PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • Customer invoices, SEC and PE Small Use Customer Pack had the required contact information for Western Power.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
REPORTING				
305 □ Type [2]	2018 Code of Conduct, CI 13.1 - A retailer and a distributor must prepare a report in respect of each reporting year setting out the information specified by the ERA.		FINDING: During the audit period the Licensee was required to prepare an Electricity Retail Licence Performance Reporting Datasheet for the 2023 year. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Corporate Outlook Calendar • Internal Audit Findings to 31 Mar 24 • 2023 Electricity Retail Licence Performance Reporting Datasheets • Request to Publish_2023 Performance Datasheet • 2023 Electricity performance reporting datasheet - Retail Indicators (ERA website) • 2022 SD Email and ERA Response PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Electricity Retail Licence Performance Reporting Datasheets – due for submission by the 30 September annually and were to be published to the Perdaman Energy website within the timeframe specified by the ERA. • There was no requirement to submit a report for 2022 year as the Licensee did not have any small use customers for this reporting period. 	
	PRIORITY - 4	CONTROLS RATING – NP		COMPLIANCE RATING - 1
	2024 - NIL			
306 Type [2]	2018 Code of Conduct, CI 13.2 - The report specified in clause 13.1 must be provided to the ERA by the date, and in the manner and form, specified by the ERA.		FINDING: During the audit period the Licensee was required to prepare an Electricity Retail Licence Performance Reporting Datasheet for the 2023 year. The spreadsheet was provided	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				by the required date and the using the 2023 Electricity performance reporting datasheet - Retail Indicators accessible via the ERA website. DOCUMENTS/SYSTEMS: • Refer documents and systems obligation 305. PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • Refer observations obligation 305.
	PRIORITY - 4	CONTROLS RATING – NP	COMPLIANCE RATING - 1	
	2024 - NIL			
307 □ Type [3]	2018 Code of Conduct, CI 13.3 - The report specified in clause 13.1 must be published by the date specified by the ERA. In accordance with clause 13.3(2), a report is published if: <ul style="list-style-type: none"> • copies are available to the public, without cost, in places where the retailer or distributor transacts business with the public; and • a copy is posted on the retailer or distributor’s website. 			FINDING: Perdaman Energy complied with Clause 13.3 by publishing the required report specified in Clause 13.1 within the timeframe set by the ERA. DOCUMENTS/SYSTEMS: • Refer documents and systems obligation 305. PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • The report was made available to the public without cost through the following methods: - Posted on the Perdaman Energy website, fulfilling the requirement under Clause 13.3(2).
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
SERVICE STANDARD PAYMENTS				

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
308 □ Type [2]	2018 Code of Conduct, CI 14.1(1) - Subject to clause 14.6, a retailer must pay the stated compensation to a customer if the customer is not reconnected in accordance with the timeframes specified in Part 8.		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to make service standard payments. As such compliance with the requirements relating to facilitating customer reconnections were not applicable.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • PE Commercial Terms V2061 • Internal Audit Findings to 31 Mar 24 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • The Commercial Terms specified the licensee can request information on service standard payments. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
308A.+ Type [2]	2022 Code of Conduct, CI 94(1) - Unless clause 99 applies, a retailer must make the payment specified under subclause 94(2), if the retailer is required to arrange a reconnection of a customer's supply address under part 8, and either the retailer has not complied with clause 53(3) or (4) or the retailer has complied with clause 53(3), but a distributor has not complied with the timeframes set out in clause 54(4).		<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to make service standard payments. As such compliance with the requirements relating to facilitating customer reconnections were not applicable.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • PE Commercial Terms V2061 • Internal Audit Findings to 31 Mar 24 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p>	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	<ul style="list-style-type: none"> The Licensee confirmed awareness to the requirements associated with service standard payments and reference to service standard payments were specified in the Commercial Terms.
	2024 - NIL			
308B + Type [2]	2022 Code of Conduct, CI 94(2) - A retailer must pay the customer \$60 for each day that the retailer or the distributor (as the case may be) is late, up to a maximum of \$300.			<p>FINDING: Refer to the finding for obligation 308A</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> PE Commercial Terms V2061 Internal Audit Findings to 31 Mar 24 <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> Refer observations 308A.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
310 Type [2]	2022 Code of Conduct, CI 95(1) - Unless clause 99 applies, a retailer must make the payment specified under subclause 95(2) if the retailer: <ul style="list-style-type: none"> fails to comply with any of the procedures set out under Part 6 (if applicable and other than clauses 45(3) and 46), or clause 48 or 82(1), before arranging for disconnection of, or disconnecting the customer for failure to pay a bill; or arranges for disconnection of or disconnects the customer for failure to pay a bill in contravention of clause 49, 50 or 52 for failure to pay a bill. 			<p>FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to make a service standard payment as a result of a wrongful disconnection.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> PE Commercial Terms V2061 Internal Audit Findings to 31 Mar 24 <p>PERSONNEL INTERVIEWED:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	<ul style="list-style-type: none"> Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> Refer observations 308A.
	2024 - NIL			
312 Type [2]	2022 Code of Conduct, CI 96 - Unless clause 99 applies, if a retailer fails to acknowledge or respond to a complaint within the timeframes set out in clause 88, the retailer must pay the customer \$20.			FINDING: The Licensee responded to all complaints (refer obligation 302) in accordance with the prescribed timeframes. As such payments were not required. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> PE Commercial Terms V2061 Internal Audit Findings to 31 Mar 24 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> Refer observations 308A.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
315 Type [2]	2022 Code of Conduct, CI 100(1) - A retailer that is required to make a payment under clause 94, 95 or 96 must do so in the manner specified in subclause 100(1).			FINDING: The Licensee confirmed that for the duration of the audit period, Perdaman Energy was not required to make service standard payment to a customer under clause 94, 95 or 96. As such assessment of compliance with the requirements of subclause 100(1) could be undertaken. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> PE Commercial Terms V2061 Internal Audit Findings to 31 Mar 24

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
			PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • Refer observations 308A.
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR
	2024 - NIL		
15 ELECTRICITY INDUSTRY METERING CODE 2012 – LICENCE CONDITIONS AND OBLIGATIONS			
324 Type [2]	Electricity Industry Metering Code, CI 3.3B - If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi- directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi- directional flows, the user must notify the network operator within 2 business days.		FINDING: The Licensee confirmed that during the audit period, there were no occasions where Perdaman Energy became aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flow and as such resulted in changes in a customer's circumstances in a metering point that resulted in bi-directional flows. DOCUMENTS/SYSTEMS: • Meter Reconfiguration • Customer attribute update • WP Web Portal PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS:

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	<ul style="list-style-type: none"> It was understood internal control processes would identify sites where bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flow.
	2024 - NIL			
339 Type [2]	Electricity Industry Metering Code, CI 3.11(3) - A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable			<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy was not aware of any outages or malfunction of a metering installation in relation to customer accounts.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
371 Type [NR]	Electricity Industry Metering Code, CI 4.4(1) - If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.			<p>FINDING: The Licensee confirmed that during the audit period, Perdaman Energy did not become aware of a discrepancy between energy data held in a metering installation and in the metering database.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> WP Web Portal Western Power ETAC (Electricity Transfer Access Contract) <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - NR	OBSERVATIONS: • The Western Power ETAC covers metering responsibilities broadly but did not specify procedures for identifying, liaising, and resolving discrepancies in metering data.
	2024 - NIL			
372 Type [NR]	Electricity Industry Metering Code, CI 4.5(1) - A Code participant must not knowingly permit the registry to be materially inaccurate.			FINDING: Refer to finding for obligation 371. DOCUMENTS/SYSTEMS: • WP Web Portal • Western Power ETAC (Electricity Transfer Access Contract) PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
373 Type [2]	Electricity Industry Metering Code, CI 4.5(2) - Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.			FINDING: Refer to finding for obligation 371. DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
	2024 - NIL			
388 Type [2]	Electricity Industry Metering Code, CI 5.4(2) - A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).		FINDING: The Licensee confirmed that during the audit period, that Perdaman Energy provided Western Power when requested, information to assist them to validate energy data contained in the metering database as required by their obligations, refer Appendix 2 of the Metering Code. DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
402 Type [2]	Electricity Industry Metering Code, CI 5.17(1) - A user must provide standing data and validated, and where necessary substituted or estimated, energy data to the user's customer to which that information relates where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.		FINDING: The Licensee confirmed that during the audit period, that Perdaman Energy was obligated to supply meter data to the customer on request and at no charge and did so when requested. DOCUMENTS/SYSTEMS: • WP Web Portal • Perdaman Energy Commercial Terms for Electricity Supply – V2061 • CRM PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	OBSERVATIONS: • The Commercial Terms specify the process for obtaining consumption data.
	2024 - NIL			
406 Type [2]	Electricity Industry Metering Code, CI 5.19(1) - A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere, and provide that information to the network operator.			FINDING: The Licensee confirmed that during the audit period, Perdaman Energy complied with any requests by the network operator to collect information from customers. DOCUMENTS/SYSTEMS: • WP Web Portal PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
407 Type [NR]	Electricity Industry Metering Code, CI 5.19(2) - A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated. Note: The prescribed information listed in clause 5.19(2) was changed by the Electricity Industry (Metering) Amendment Code 2018.		FINDING: The Licensee confirmed that during the audit period, Perdaman Energy complied with any request to collect and maintain a record of the address, site and customer attributes other than that provided at transfer DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • WP Web Portal • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • It was noted one LUC transferred to the Licensee during the audit period who was an existing Life Support Customer. • It was noted in general this information was collected by Western Power. 	
	PRIORITY - 5	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
408 Type [2]	Electricity Industry Metering Code, CI 5.19(3) - Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.		FINDING: The Licensee confirmed that during the audit period, no instances were identified where a change in an attribute described in Clause 5.19(2) occurred, which would have required notification to the network operator. As such, compliance with Clause 5.19(3) could not be assessed in practice. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • WP Web Portal • PE Small Use Customer Pack • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED:	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
				<ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> The requirement to notify the network operator within 1 business day was not triggered
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	
	2024 - NIL			
410 Type [NR]	Electricity Industry Metering Code, CI 5.19(6) - The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user.			<p>FINDING: The Licensee confirmed that during the audit period, confirmed that Western Power generates notice of changed Standing Data attributes, which the licensee acknowledged without further correspondence to Western Power</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> WP Web Portal ETAC Perdaman Energy [Signed 5/5/22] <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> NIL
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			
416 Type [2]	Electricity Industry Metering Code, CI 5.21(5) - A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.			<p>FINDING: The Licensee confirmed that during the audit period, when meter tests were requested Perdaman Energy was a user under the code at the time of the request.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> WP Web Portal ETAC Perdaman Energy [Signed 5/5/22] <p>PERSONNEL INTERVIEWED:</p>

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	<ul style="list-style-type: none"> Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> Evidence of meter data test requests were provided.
	2024 - NIL			
417 Type [2]	Electricity Industry Metering Code, CI 5.21(6) - A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.			FINDING: The Licensee confirmed that during the audit period, that Perdaman Energy could only request a test only if at the time of the request it is the incumbent retailer. Perdaman Energy made no requests that were inconsistent with any access arrangement or agreement. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> WP Web Portal ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1	
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
435 Type [2]	Electricity Industry Metering Code, CI 5.27 - Upon request from a network operator, the current user for a connection point must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.		FINDING: The Licensee confirmed that during the audit period, that Perdaman Energy did not receive a request from the network operator in relation to customer attribute information that it reasonably believes are missing or incorrect DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> NIL 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - NR
	2024 - NIL			
448 Type [2]	Electricity Industry Metering Code, CI 6.1(2) - A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.		FINDING: The Licensee confirmed that during the audit period, that Perdaman Energy has and ETAC and has complied with rules, procedures, agreements and criteria prescribed. The Licensee uses the Western Power portal to make all metering transactions and thus meet compliance with Western Power's rules, procedures, agreements and criteria. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> WP Web Portal ETAC Perdaman Energy [Signed 5/5/22] Internal Audit Findings to 31 Mar 24 PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> Shannon Hewitt - General Manager OBSERVATIONS:	

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		<ul style="list-style-type: none"> • Relevant documentation included Metering Code Communication Rules (refer Build Pack SWIS Communication Rules), Model Service Level Agreement, Metrology Procedure.
451 Type [NR]	Electricity Industry Metering Code, CI 7.2(1) - Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.		<p>FINDING: The Licensee confirmed that during the audit period, that Perdaman Energy and Western Power did not encounter difficulties. Evidence of communication with network operator reviewed.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • WP Web Portal <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> • Regular communication with the network operator was. confirmed by the Licensee. • It was noted that Perdaman Energy does not offer the facsimile (as generally an obsolete means of communication) contact details on its website.
	PRIORITY - 5	CONTROLS RATING - NP	COMPLIANCE RATING - 1
	2024 - NIL		
453 Type [2]	Electricity Industry Metering Code, CI 7.2(4) - If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.		<p>FINDING: The Licensee confirmed that during the audit period, that Perdaman Energy was not requested by the network operator to notify its contact details.</p> <p>DOCUMENTS/SYSTEMS:</p> <ul style="list-style-type: none"> • NIL <p>PERSONNEL INTERVIEWED:</p> <ul style="list-style-type: none"> • Shannon Hewitt - General Manager

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION			FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	OBSERVATIONS: • NIL
	2024 - NIL			
454 Type [2]	Electricity Industry Metering Code, CI 7.2(5) - A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.			FINDING: The Licensee confirmed that during the audit period, that Perdaman Energy has not had any requirements to notify the network operator of any change to its contact details. DOCUMENTS/SYSTEMS: • NIL PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP	COMPLIANCE RATING - NR	• NIL
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS				
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS	
455 Type [2]	Electricity Industry Metering Code, CI 7.5 - A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code.		FINDING: The Licensee confirmed that during the audit period, that Perdaman Energy has established internal policies and codes of conduct in relation to privacy, confidentiality and the handling of sensitive information. In respect to the Metering Code “confidential information” refers to standing data and energy data; and any other information which is confidential information of, or commercially sensitive to, a customer or code participant. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • Privacy Policy V3011 • ETAC Perdaman Energy [Signed 5/5/22] • Perdaman Energy Website PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • The Licensee has developed a Privacy Policy which is published on their website. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			
456 Type [2]	Electricity Industry Metering Code, CI 7.6(1) - A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.		FINDING: Refer finding for obligation 455. DOCUMENTS/SYSTEMS: <ul style="list-style-type: none"> • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: <ul style="list-style-type: none"> • Shannon Hewitt - General Manager OBSERVATIONS: <ul style="list-style-type: none"> • Refer observations for obligation 455. 	
	PRIORITY - 4	CONTROLS RATING - NP		COMPLIANCE RATING - 1
	2024 - NIL			

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
457 Type [NR]	Electricity Industry Metering Code, CI 8.1(1) - If any dispute arises between any Code participants, then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations. DOCUMENTS/SYSTEMS: • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP COMPLIANCE RATING - NR	
	2024 - NIL		
458 Type [NR]	Electricity Industry Metering Code, CI 8.1(2) - If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations. DOCUMENTS/SYSTEMS: • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP COMPLIANCE RATING - NR	
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
459 Type [NR]	Electricity Industry Metering Code, CI 8.1(3) - If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations. DOCUMENTS/SYSTEMS: • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP COMPLIANCE RATING - NR	
	2024 - NIL		
460 Type [2]	Electricity Industry Metering Code, CI 8.1(4) - If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations. DOCUMENTS/SYSTEMS: • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 4	CONTROLS RATING - NP COMPLIANCE RATING - NR	
	2024 - NIL		

ELECTRICITY INDUSTRY – RETAIL LICENCE CONDITIONS AND OBLIGATIONS			
No. [TYPE]	OBLIGATION REFERENCE AND DESCRIPTION		FINDING/ VERIFICATION/ PERSONNEL INTERVIEWED/ OBSERVATIONS
461 Type [NR]	Electricity Industry Metering Code, CI 8.3(2) - The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).		FINDING: The Licensee confirmed that during the audit period, there have been no disputes with Western Power in relation to the metering code obligations. DOCUMENTS/SYSTEMS: • ETAC Perdaman Energy [Signed 5/5/22] PERSONNEL INTERVIEWED: • Shannon Hewitt - General Manager OBSERVATIONS: • NIL
	PRIORITY - 5	CONTROLS RATING - NP COMPLIANCE RATING - NR	
	2024 - NIL		

Note:

- * indicates obligation was reclassified during the audit period from NR to Type 2 (Refer Amendment Record - Electricity Compliance Reporting Manual – June 2020). Prior to this period the rating was NR.
 - ** indicates identified as non-compliant in previous audit or an Annual Compliance Report
- NP - not possible to provide a controls rating because no activity has taken place to exercise the obligation during the audit period.
 NR - Not applicable to audit period and as such compliance was not assessed.

APPENDIX 2 – AUDIT DOCUMENT LISTING

Documents Reviewed

Table 12 - Documents Reviewed

Note: If blank document assessment, the document was reviewed but not assessed during the audit process.

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
1	• Western Power portal access	X	X	X	X		X
2	• Western Power email	X	X	X	X	X	X
3	• Western Power Build Pack - responsible personnel	X	X	X	X		X
4	• Customer Data Requests - Procedure	X	X				
5	• Customer Transfer Requests - Procedure	X	X				
6	• WP Portal CTR Requests	X	X				
7	• WP Portal Erroneous CTRs	X					
8	• Perdaman Energy Letter of Authority V4011	X	X				
9	• Sample VCF [HFM]	X	X				
10	• Customer List	X	X	X	X	X	X
11	• 2023 Electricity Compliance Report_Perdaman Energy	X	X	X	X	X	X
12	• 2022 SD Email and ERA Response			X	X	X	
13	• 2023 SD Email and ERA Response			X	X	X	
14	• 2022 Datasheet Email Confirmation			X	X	X	
15	• Perdaman Energy 2023 Electricity Performance Reporting Datasheet			X	X	X	
16	• Internal Audit Findings to 31 Mar 24	X	X	X	X	X	X
17	• Complaints Register	X	X	X	X	X	X
18	• Request to Publish_2023 Performance Datasheet			X	X	X	
	ERA INVOICES & PAYMENT RECEIPTS				X		
19	• ARTRX_1001615				X		
20	• ARTRX_1001619				X		
21	• ARTRX_1001687				X		
22	• ARTRX_1001728				X		
23	• ARTRX_1002761				X		
24	• ARTRX_1004700				X		
25	• R_1001615 1001619				X		
26	• R_1001687				X		
27	• R_1001728				X		
28	• R_1002761				X		

DOCUMENT REF NUMBER	DOCUMENT NAME List of all documentation reviewed, and evidence sampled.	9 Electricity Industry Customer Transfer Code	11 Electricity Industry (Customer Contracts) Regs	12 Electricity Industry Act	13 Electricity Licences	14 Code of Conduct	15 Electricity Industry Metering Code
29	• R_1004700				X		
30	• Customer Folder	X	X	X	X	X	X
31	• ERL Audit Spreadsheet	X	X	X	X	X	X
32	• PE Audit Register	X	X	X	X	X	X
33	• PE Commercial Terms V2061	X	X	X	X	X	X
34	• PE Risk Management Plan V2051	X	X	X	X	X	X
35	• PE Risk Register V2051	X	X	X	X	X	X
36	• PE Small-Use Customer Pack V2021			X	X	X	X
37	• Perdaman Finance Policy and Procedures			X	X		
38	• Shannon Hewitt Job Description	X	X	X	X	X	X
39	• Western Power ETAC	X	X	X			X
40	• D277795 Approval of Auditor - 2024 audit - ERL031 - Perdaman Energy Pty Ltd			X	X		
41	• WP Web Portal	X	X	X			X
42	• WP Build Pack	X	X	X			X
43	• Privacy Policy V3011	X	X	X			
44	• Email to small use customer 14/06/2022	X	X	X	X	X	
45	• Billing spreadsheet				X	X	
46	• CRM	X	X	X	X	X	X
47	• Perdaman Energy - Electricity Supply Agreement	X	X	X		X	
48	• Customer Complaint Guidelines – October 2016					X	