



Mojo Power Life Support Compliance Audit

In June 2019 the Australian Energy Regulator (AER) required Mojo Power to carry out a compliance audit in connection with its life support obligations under the National Energy Retail Law and Rules.

Mojo Power was required to assess the adequacy and effectiveness of their compliance policies, procedures and systems in a number of key areas and to assign an overall grading of:

- **Adequate/Effective:** Minimal or no action required, with only minor and low risk findings. Improvement opportunities exist to achieve best practice in meeting the relevant obligations.
- **Partially adequate/effective:** Improvement is required to some key processes and controls, and is likely to require substantial effort in order to support compliance with the relevant obligations.
- **Inadequate/Ineffective:** Significant improvement is required, and may require urgent revision to or implementation of processes and controls in order to support compliance.

Findings

Registration of life support equipment

The audit identified instances where life support customers were not fully registered in Mojo's system, required information was not supplied to life support customers within the required timeframe, registration forms were non-compliant and formalised life support training processes were absent.

Recommendations focused on developing documented registration processes, updating registration forms, developing formal life support training, and retention and review of training completion records.

Confirmation of premises as requiring life support equipment

The audit identified instances where medical confirmation forms were non-compliant and an implemented quality assurance/compliance monitoring program, in relation to life support processes, was partially inadequate.

Findings

Recommendations focused on updating medical confirmation forms and documenting a formal compliance monitoring process.

Ongoing retailer and distributor obligations

The audit identified instances where the *retailer planned interruption* notice was non-compliant, a formal quality assurance policy was absent, outsourced planned interruption service provider procedures were undocumented and distributors had not been provided information about a *retailer planned interruption* in line with the Retail Rules.

Recommendations focused on updating the *retailer planned interruption* notice and procedures, quality assurance and documenting planned interruption responsibilities, including compliance monitoring and reporting.

Deregistration of premises

The audit identified a deregistration process that excluded the required customer contact options and an instance where a required deregistration notice was not sent.

Recommendations focused on updating deregistration procedures and templates.

Registration and deregistration details kept by retailers and distributors

The audit identified the absence of a quality assurance procedure, to ensure consistency of customer life support information across all its systems.

Recommendations focused on the implementation of a formal program of compliance checks and reviews by a person independent of implementation of life support processes.

Reporting requirements for regulated entities – AER Compliance Procedures and Guidelines

The audit identified Mojo's formal quality assurance program was partially inadequate.

Recommendations focused on documenting an incident investigation procedure.

Next steps

Mojo Power has completed a remediation plan to address the audit recommendations.