
Purpose

This procedure sets out the principles that Cowell Electric has adopted for the management of written feedback, suggestions or complaints – received in relation to electricity distribution and retail services provided and the experiences of the delivery of those services by Cowell Electric. It describes the principles that we follow to recover the experience when our service delivery has not met expectations.

Cowell Electric recognises the importance of a well-managed complaints handling process as part of providing a quality customer service. We are accountable for our actions and decisions, and customers and other external parties have the right to complain about us and seek remedy for decisions that affect them.

This procedure does not apply to electricity distribution and retail queries, suggestions and grievances received verbally.

This complaint handling procedure was developed in accordance with AS 10002-2022: Guidelines for complaint management in organizations.

Scope

This procedure applies to all Cowell Electric personnel who interact or deal with electricity distribution and retail customers.

Definitions

Authorised Representative	Person authorised by the Complainant to act of their behalf
Complainant	Person or entity affected by the action or inaction of Cowell Electric
Complaint	A written expression of dissatisfaction with any aspect of electricity distribution and retail services offered by Cowell Electric.
Complaint handling system	The way individual complaints are dealt with by Cowell Electric including the policy, procedures, practices and technology.
Customer Relationship Management system (CRM)	An electronic system for recording incoming correspondence from electricity retail customers, to Cowell Electric, including complaints.
Grievance	A verbal expression of dissatisfaction with any aspect of the electricity distribution and retail services offered by Cowell Electric.
Respondent	Cowell Electric

Responsibilities

The Retail and Metering Coordinator is responsible and accountable for the receipt, allocation and follow up of all complaints related to Cowell Electric's electricity distribution and retail services.

The following section outlines the roles of various Cowell Electric staff members in the handling of electricity distribution and retail related complaints.

Role of the Retail and Metering Coordinator

The Retail and Metering Coordinator is responsible for coordinating the internal complaint resolution process in relation to electricity distribution and retail services, and is the contact for external stakeholders and complaint-making bodies. The Retail and Metering Coordinator is also responsible for:

- Combining their knowledge of complaint resolution with the expertise of other Cowell Electric staff and managers to provide effective outcomes for complainants
- Reviewing complaints and allocating them to an appropriate Senior Manager (depending on the seriousness and complexity of the complaint) for investigation and resolution
- Reviewing and amending written responses for complainants in accordance with this procedure.
- Seeking advice from the Cowell Electric Chief Executive Officer, where necessary to resolve a complaint.
- Providing timely, consistent, and fair responses for complainants in accordance with this procedure.
- Ensuring quality of data recorded in the Customer Relationship Management system (CRM) Ensuring a copy of the complaint is given to the HSEQ Manager for entry in the Cowell Electric Customer Feedback function of the IMS System
- Updating details and results of the complaint in the IMS System
- Reporting to management on complaint outcomes and making recommendations to management, based on complaint data and trends.
- Monitoring/Tracking the complaint
- Resolving the complaint based on recommendations made by the allocated person/Manager or Senior Manager

Role of the Head Office Administration Officer

The Head Office is the first point of contact for all telephone calls, letters and e-mails and is therefore responsible for:

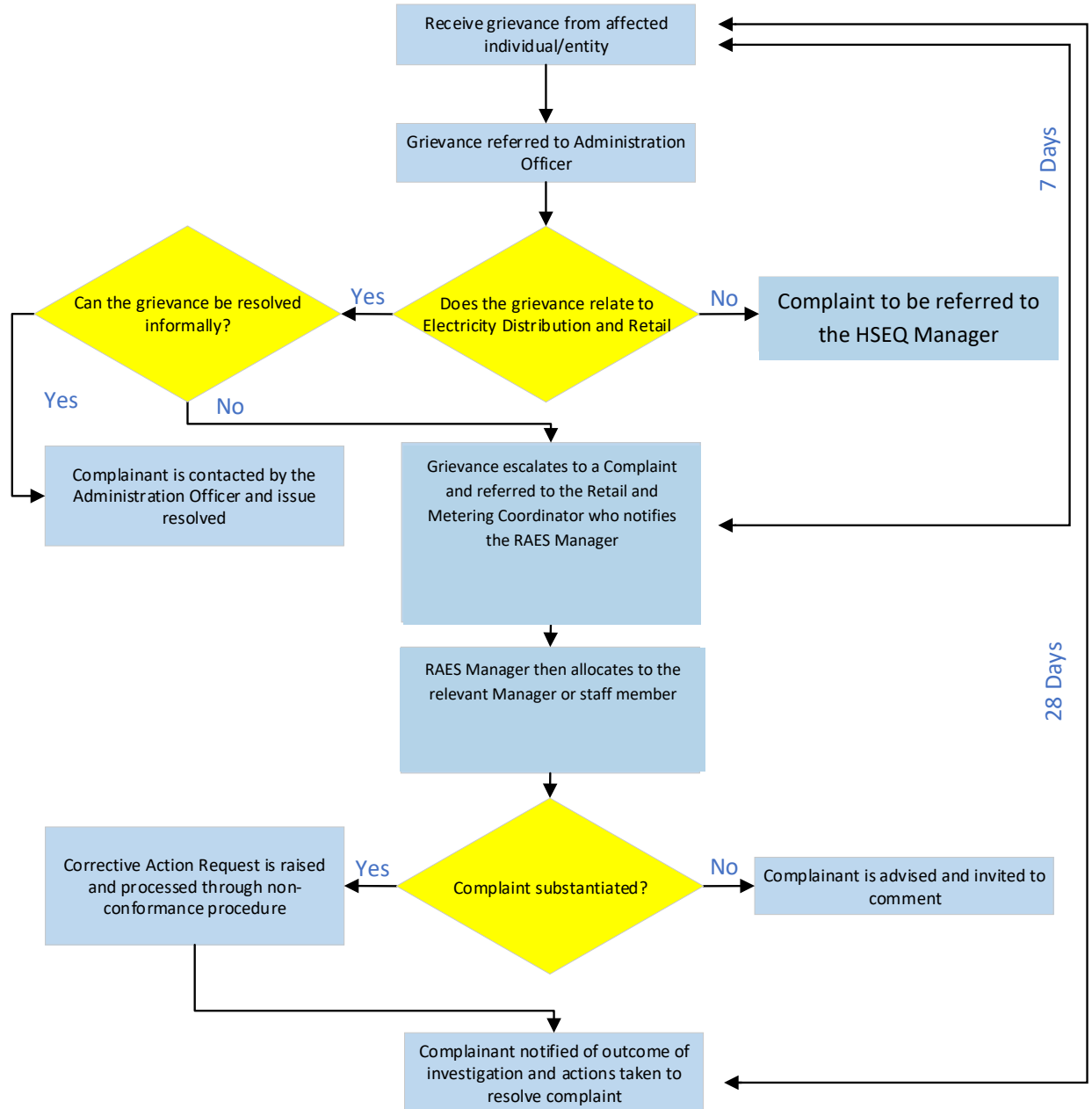
- Identifying that the complaint is in regards to Cowell Electric's Electricity distribution and Retail services
- Resolving verbal expressions of dissatisfaction within 7 days.
- Instructing Electricity Distribution and Retail Customers that all complaints must be submitted in writing via email or mail
- Entering details of complaint into the Customer Relationship Management system (CRM) Forwarding the complaint to the Retail and Metering Coordinator immediately

Role of the Allocated Person

The allocated person (may be a Senior Manager, Manager or other staff member) is responsible for:

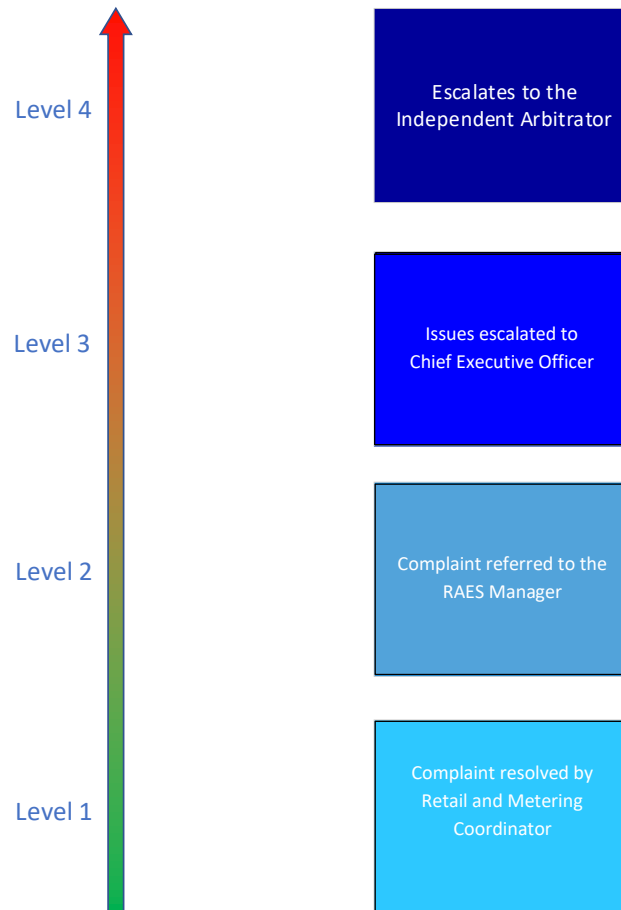
- Preparing a letter of acknowledgment for signature by the Retail and Metering Coordinator which must be sent to the complainant within 3 business days of receiving their complaint in writing if possible. This may also be followed up by phone to ensure the complainant has had prompt acknowledgement of their complaint.
- Conducting interviews to assist with the investigation of the complaint.
- Ensuring accurate recording of findings and accurate documentation.
- Preparing/providing a response to the complaint following investigation into the procedures.
- Preparing summary reports on findings of the complaint investigation.
- Making recommendations to resolve the complaint.

Cowell Electric Distribution and Retail Complaints Handling at a Glance



Goals for Handling Complaints

The diagram below indicates the overall goal in which Cowell Electric handles Retail and Metering complaints. It is the intention to resolve as many complaints as possible at level 1.



Key Features of an Effective Complaint Handling Process

Commitment

At Cowell Electric, we are fully committed to providing an integrated complaints handling process. If you are not satisfied with the service you have received from us, we welcome your feedback. It gives us the opportunity to fix the problem and improve our service to you and to others.

Giving Your Feedback to Cowell Electric

- In writing either to retail@cowellelectric.com.au or mail to:

Retail and Metering Coordinator
Cowell Electric
PO Box 70
COWELL, SA 5602

This procedure is endorsed by the Chief Executive Officer of Cowell Electric and is accessible to all Cowell Electric staff, customers and external parties.

Fairness

Cowell Electric recognises the need to be fair when dealing with complaints. Cowell Electric will apply fairness when dealing with complaints through the following processes:

- Judge all complaints on its merits and facts
- Provide appropriate remedies when complaints are substantiated
- Take all complaints seriously
- Ensure conflicts of interests are declared and dealt with accordingly
- Give equal treatment to all people
- Committed to ensuring that no one will suffer reprisals as a result of complaining
- Provide alternative / further avenues for review
- Ensure our core values are reflected in all dealings with all people.

Cowell Electric values:

- Safety
We value all members of Cowell Electric actively contributing to embedding a “Zero Harm Safety Culture” within our organisation to collectively achieve a safe, productive and enjoyable workplace for all
- Quality
Project delivery requires flexibility and innovation without sacrificing schedule. A quality product delivered both internally and externally by all areas of our organisation is essential to the success of our business
- Innovation
Our ability to remain competitive within our markets relies on our ability to provide unique solutions to our customers’ requirements. We encourage our employees to continually improve in their respective areas of the business
- Respect
We value the wellbeing of our employees, their families and their communities and provide a work environment that fosters respect amongst our employees, and respect towards all cultures and communities outside of our organisation
- Relationships
We value the relationships with customers, suppliers, employees and the communities within which we operate and aim to develop long term relationships with these people for the benefit of all parties
- Entrepreneurial
We empower our employees seeking out and identifying new business markets, products and customers to add value to our organisation through their respective work practices
- Environmental
Actively reducing the footprint of the Company’s activities on the world around us



Transparency and access to the retail complaints handling Procedure

Internally

- Available on the IMS Software system
- Become part of the induction training for new staff who interact with electricity distribution and retail customers
- Periodic reminders/retraining

Externally

- Available on the Cowell Electric website
- Hard copies mailed out upon request
- Soft copies emailed upon request

Responsiveness

Cowell Electric is committed to dealing with complaints quickly, courteously, fairly and within the following timelines:

- If the complaint is deemed minor and easily resolved, the Retail and Metering Coordinator will contact the complainant as soon as is practical via telephone to resolve over the telephone
- For more involved complaints that will require investigation, the complainant receives written acknowledgment of receipt of the written complaint within 7 days of the complaint being received by Cowell Electric.
- Complainant contacted within 28 days of receipt of the complaint with the outcome of the investigation. If the investigation is not complete, the complainant is still to be contacted within the 28 days and advised of the progress of their complaint.
- If, at this stage, the complainant is not satisfied with the outcome, the right to appeal and/or alternative avenues will be provided.

Privacy and confidentiality

All complaints will be handled according to the following legislation and / or Acts:

- Privacy Act 1988 (Commonwealth)
- Freedom of Information Act 1991 (SA)

Further assurances from Cowell Electric:

- Information that is provided will only be used for the purposes of investigating and resolving the complaint
- The information may be disclosed in a de-identified format for the purposes of business improvement and reporting purposes.

Business improvement

Cowell Electric is committed to taking action to change the underlying business process or service where investigations reveal several complainants have experienced similar circumstances that have lead to them making a complaint.

This is done through systematic recording, reporting and analysis of complaint trends.

Internal Review

If the complainant is unhappy with the manner in which their complaint was handled, or with the outcome, they have the right to ask for an internal review.

In the case of an internal review, the Chief Executive Officer will undertake the function of reviewing the matter and recommending alternative action if appropriate and escalating any issues to the Director.

If the complainant is still not satisfied, they may take their complaint to the independent Arbitrator at the Outback Communities Authority or EWOSA. Please see section 9 for further information.

Complaints Handling Checklist

A. *Complaint Receipt*

Where the complaint is received in person or over the phone

The Cowell Electric staff member informs the complainant or their authorised representative to submit their complaint in writing either via email or in a letter.

Where the complaint is received in writing (, E-mail or Letter)

- The Administration Officer enters the details of the complaint and attaches a copy of the written complaint to the customer's account in the CRM.
- The complaint is referred to the Retail and Metering Coordinator for allocation.
- The Retail and Metering coordinator forwards a copy of the written complaint to the HSEQ Manager for lodgement in Skytrust.

B. *Allocation of the complaint*

The Retail and Metering Coordinator allocates an appropriate person to investigate the matter.

C. *Acknowledgement of the complaint*

- The 'Allocated Person' prepares a letter of acknowledgement for consideration of the Retail and Metering Coordinator within 3 business days and advises that:-
 - The complaint will be investigated by a nominated person (name), and contact telephone number; and
 - The allocated person will contact the complainant if additional information is required, and
 - The result of the investigation into the complaint will be provided to the complainant in writing within 28 days of the complaint being received.
- The letter should be forwarded to the Retail and Metering Coordinator for approval and signature.
- The Retail and Metering coordinator sends the original, saves an electronic copy in the CRM. under the customer's account number and forwards a copy to the HSEQ Manager.

D. Investigation of the complaint

- Where there are insufficient details for an investigation to commence, or the actual complaint is not properly identified, the Allocated Person should make contact with the complainant to obtain or clarify any relevant information.
- The Allocated Person identifies and contacts all persons that can assist with the investigation and arranges interviews.
- The Allocated Person attends all interviews
 - All interviews should be conducted in a professional manner, producing identification, where appropriate; and
 - Statements given should be recorded in writing which includes the date, time and details of the person taking the statement.
- All relevant documents should be identified, scanned and saved in the CRM under the number allocated to the complainant and copies supplied to the HSEQ Manager.
- If the complaint cannot be finalised within the 28 day period, the Retail and Metering Coordinator needs to be advised via email and the complainant advised of the expected date of completion of the investigation.

E. Completion of the complaint investigation

The Report

A report for the Retail and Metering Coordinator must be prepared by the allocated Person setting out the following:

- Specific details of the complaint;
- Details of the complainant;
- Name of the allocated person;
- Persons interviewed and a summary of their interview, which also includes the date, time and where the interview took place;
- A list should be compiled of all relevant documents;
- Copies of all relevant documents attached;
- The conclusion that has been reached; and
- Any recommendations arising out of the investigation.

The Letter of Response

- The Allocated Person is also responsible for preparing a letter of response to the complainant, which should include the following information:
 - Details of the complaint;
 - The name of the allocated person;
 - The number of persons interviewed;
 - A statement that all documents were closely examined; and
 - Advice of the conclusion reached and any action that was taken or that is to be taken as a result of the complaint.
 - This is forwarded to the Chief Executive Officer and the Retail and Metering Coordinator for feedback
 - This is also entered into the CRM under the number allocated to the complaint and a copy given to the HSEQ Manager.
- Allocated Person receives comments from the Chief Executive Officer and the Retail and Metering Coordinator.
- Allocated Person makes any necessary amendments.
- The final report, recommended actions and letter of response should be in writing and signed by the Chief Executive Officer.
- The outcome of an internal review must be advised in writing and signed by the Director.

F. Endorsement of Recommended Actions

The Chief Executive Officer endorses the action/s that are recommended by the Allocated Person, if they agree. Implementation may take a period of time, eg. If the complaint is in regards to procedures. If this is the case, the complainant should be advised in the letter of the response time that will be required to implement the relevant action/s.

Please Note:

- If the complaint relates to a Cowell Electric employee and is substantiated and relates to an issue of performance, then this will be noted in their employee file.
- If the complaint is substantiated a Corrective Action Request shall be raised and passed on to the HSEQ Manager.
- If the complainant is not satisfied with the response from Cowell Electric and no other action can be taken, then the complaint is to be referred to Outback Communities Authority or EWOSA, the appointed independent external parties

G. Complaints Register

- Upon completion of the investigation, the Allocated Person must ensure that the CRM is updated with the findings of the investigation.
- Complete all details including the findings of the complaint.



Alternative Avenues for Dealing with a Complaint

Complaint and dispute resolution bodies

Outback Communities Authority

Investigates and resolves disputes between Cowell Electric Electricity Retail customers and Cowell Electric.

Contact Details:

Mr Mark Sutton

Director

Outback Communities Authority

Free Call 1800 640 542 (for unincorporated areas only)

Phone 08 8648 5970

Mobile 0427 001 969

Address 12 Tassie St, Port Augusta 5700

Postal PO Box 2353, Port Augusta 5700

Website www.oqa.sa.gov.au

The South Australian Energy and Water Ombudsman

If the complaint is unable to be resolved by Cowell Electric directly or by the independent arbitrator from Outback Communities Authority the Energy and Water Ombudsman can be contacted on:

Free Call 1800 665 565

Website www.ewosa.com.au