DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

***Participant**: e4b Pty Ltd*

***Completion Date**: 24 October 2014*

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A. PROPOSED CHANGES TO THE METER CHURN PACKAGE 3

1. Proposed Changes

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- SLP Metering Provider Services Category B for Metering Installation Types 1, 2, 3, 4, 5 and 6

NOTE: No proposed changes have been populated please refer to mapping documents and change marked procedures. Please complete where necessary

Please include your comments in the 'Participant Comment' column below.

A. Proposed Changes to the Meter Churn Package

Item	Description	Category	Participant Comments
1	PROPOSED/ REQUESTED CHANGES		
1.1	**Refer attached submission letter**	**Procedure only**	
1.2		**Procedure only**	
1.3		**Procedure only**	
1.4		**Procedure only**	
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Item	Description	Category	Participant Comments
1.10		**Procedure only**	
1.11			
1.12			
1.13			
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1.15			
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24 October 2014

Ms Jackie Krizmanic
AEMO
GPO Box 2008
Melbourne VIC 3001

Submitted by email: NEM.MDP@aemo.com.au

Dear Ms Krizmanic

METER CHURN PROCEDURE FOR FINANCIALLY RESPONSIBLE MARKET PARTICIPANTS

e4b welcomes the opportunity to provide its views in relation to the proposed changes to the Meter Churn Procedure for Financially Responsible Market Participants.

e4b is an energy services company that provides energy broking, energy contract management and other value-adding data services to medium to large business customers.

In order to be in a position to provide these services, it is critical that we have access to our customers' metering data. Accordingly, e4b considers that its views are pertinent to AEMO's review of this procedure.

Current Process

In order to efficiently access metering data and other value-adding services, we typically recommend that our customers utilise the services of our preferred metering services provider (for MP/MDP roles). If a meter change is required, we seek to have this completed in a timeframe that provides for the new meter(s) to be in place concurrent with the commencement date of the customer's energy supply agreement.

Proposed New Procedure

Where a customer enters into an energy supply agreement with a new retailer, our understanding is that the proposed procedure change would effectively mean that the new retailer cannot request a change of MP/MDP until it becomes the FRMP/RP.

This will result in a "gap period" between the start date of the customer's new energy supply agreement and the meter change date. This period might typically be around 15-20 days and could be significantly longer in some circumstances.

We foresee some highly undesirable outcomes as a result of this proposed change, i.e.

- Service providers such as e4b will be forced to negotiate with a range of MDPs to access data for the "gap period", leading to increased costs for our customers.

- The provision of metering services during the "gap period" will remain the responsibility of the incumbent MP/MDP, however, the terms upon which these services will be provided may be ill-defined or punitive, and are likely to result in increased costs and/or a reduction in the level of competition for the provision of metering services.
- For customers transitioning from a type 5-6 meter to type 1-4 meter, there will be no interval data for the "gap period". Accordingly, the basis for levying energy supply and network charges will become uncertain for this period, which is likely to lead to increased costs for our customers.

We strongly urge AEMO to reconsider this proposed procedural change in light of the issues raised above.

Further information

Should you have any questions or wish to discuss this submission, please contact me on mike.cirino@energy4b.com.au or 1300 781 791.

Yours sincerely

Mike Cirino
Managing Director
e4b