

CUSTOMER SWITCHING IN THE NEM

FIRST STAGE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: Ausgrid

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1. Context

This template is to assist stakeholders in giving feedback to the questions raised in the issues paper about the proposed changes to the customer switching process design in the NEM.

2. Questions raised in the NEM Customer Switching Issues Paper

Question No.	Question	Participant Comments
1	Does the proposed change, to limit 1000 series CRs to a change of FRMP only, unreasonably restrict a retailer or other party from performing an action as required by the NER? Are there any additional considerations that AEMO has not presented?	<p>Assuming the outcome is a FRMP role only change, Ausgrid agrees with the proposed change.</p> <p>Ausgrid objects to making CR1000 retrospective and prospective as this would require a significant rebuild of Ausgrid systems the costs of which may diminish the benefits of an efficient customer transfer process. CR1010 should be retained for retrospective transfers.</p>
2	Are the issues raised by AEMO regarding restrictions being placed on an MCs ability to object to an appointment reasonable?	If the outcome is a FRMP role only change, Ausgrid agrees with the change. With the retailers currently having the ability to change the MC, this has caused MSATS compliance issues for Ausgrid when there are multiple transactions in MSATS.
3	Does the removal of the notification of a pending customer switch unreasonably restrict retailers from being able to comply with the NER or NERR?	No Comment.

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4	Are there any alternative design options that AEMO should consider facilitating prevention of a customer switch by a retailer based on a certified debt, which are consistent with the ACCC REPI recommendations for the removal of the notification of a pending customer switch and do not unreasonably delay customer switches in Victoria?	No Comment.
5	Does the one business day timeframe proposed to enable the raising of the new Victorian certified debt objection CRC reasonably enable retailers to exercise the ability to prevent the customer switch?	No Comment.
6	Should AEMO seek to replace rather than redesign the current CRC with two new prospective CRs? If so, how might transactions 'in-flight' be treated upon implementation of the procedure changes and associated system changes?	Ausgrid objects to making CR1000 retrospective and prospective as this would require a significant rebuild of Ausgrid systems the costs of which may diminish the benefits of an efficient customer transfer process. CR1010 should be retained for retrospective transfers.
7	Is there a compelling reason to retain the use of the NSRD in the customer switching process? If so, what are these reasons; and what controls might reasonably be introduced such that its use no longer becomes commonplace and that customers benefit from the ability to access next-day switching?	<p>Ausgrid believes that having the NSRD allows the retailer to inform the customer that is a routine read is due or soon to be due, they have the option of waiting for the actual read to occur for an accurate transfer. This would achieve a positive outcome for all parties. NSRD should be retained as an option for customer switching.</p> <p>In table 4 – M of the CATS procedures Ausgrid suggest that the “will be” should be removed from the SP code as a B2B service order should be raised</p>

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		<p>before the CR.</p> <p>Ausgrid would also suggest that for market efficiency AEMO should also mandate that the transaction includes the B2B SO number.</p> <p>MDP should be able to object if there is no current B2B SO raised.</p> <p>In table 4 – M of the CATS procedures Ausgrid would like the to retain NS read type code. Removing this would mean that the read will always be an estimate and the temp substitution would then be replaced by an actual. Where the metering installation is a Type 6 and transfer date is close to a routine reads, revised readings will always occur.</p> <p>In the proposed model only allowing transfers on estimated reads will lead to increased billing disputes.</p>
8	Is there value in retaining an ability for a prospective change of FRMP role to occur based on a special reading?	<p>The procedures should mandate that for customer move-in transfers an Actual meter reading must be used. If it is a change in retailer and no change in customer and estimated read may be used.</p> <p>This means that a CR1030 should only be allowed with a Read Type Code of SP. We believe that this should be made clear in the CATS procedure.</p>
9	With the NSRD no longer able to be used to facilitate prospective customer switches, is there value in maintaining	No Comment.

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	access to the NSRD in NMI Discovery?	
10	How critical is the Read Quality information to the potential use of the Last Read Date for retrospective customer switching?	If AEMO is removing the right for the MDP to object due to bad date or data quality, then this information is critical. As the data will be sent to AEMO, Ausgrid suggests that these two new fields could be populated by AEMO.
11	Are there other matters that AEMO should consider regarding the three options presented, or any alternative options that AEMO might consider?	As the data will be sent to AEMO, AEMO could populate the Last Read Date and Read Quality information. If a retrospective retail transfer CR does not align with these fields, this information could then be used for MSATS to reject the transaction.
12	Has AEMO reasonably presented the relevant considerations in relation to using recent readings to support customer switching? Are there any additional considerations that AEMO has not presented?	<p>Ausgrid does not agree with the proposed 5072 CR, this will cause duplication in the market.</p> <p>Ausgrid's preference is that as the data will be sent to AEMO, AEMO should populate the Last Read Date and Read Quality information.</p> <p>Another potential solution is to add the two new fields to 5071 CR.</p>
13	Is the proposed 15 business day 'window' in which a recently-obtained metering reading could be used to support a retrospective in-situ customer switch reasonable? Are there additional matters that AEMO might consider in support of a lengthening or shortening of this 'window'?	No Comment.
14	Is the proposed inclusion of a retrospective customer switch in the CRC 1000 a preferable outcome to the creation of a new	Ausgrid objects to making CR1000 retrospective and prospective as this would require a significant rebuild

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	specific CRC for this purpose (linked to questions in section 3.1.2)?	of Ausgrid systems the costs of which may diminish the benefits of an efficient customer transfer process. CR1010 should be retained for retrospective transfers.
15	Is the proposed extension of five business days (from 10 to 15 business days) to the retrospective period within which a CR 1040 may be raised reasonable? Are there additional matters that AEMO might consider in support of maintaining the current 'window', or the lengthening or shortening of this 'window'?	No Comment.
16	Should the use of a recent reading be limited to customers who have manually read metering installations? Smart metering systems should be able to provide readings for a specified date within the last 15 business days (e.g. if a customer with a smart meter can confirm the date of their recent bill is within the last 15 business days, why should the prospective retailer be restricted from retrospectively switching the customer on that date, so that the customer and participants can access the benefits of a retrospective customer switch as described in this section?	No Comment.
17	Has AEMO overlooked any requirement or reasonable justification for the retention of the five embedded network-specific CRs?	No Comment.
18	Do the changes adequately provide for retailers to comply with the cooling-off provisions and customers' exercising their right to cool-off?	No Comment.

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19	Is the redesign of an existing cooled-off error correction CR preferable to the creation of a new error correction CR for the purpose stated above?	No Comment.
20	What problems, if any, might be caused by the removal of the error correction CRCs 1022, 1027 and 1028?	No Comment.
21	Should changes be considered to error correction CRCs 1020, 1021, 1023 and 1029 to better facilitate resolution of issues and errors for customer switching?	No Comment.
22	Are the changes proposed to the objection codes available to MCs regarding MC role appointment reasonable?	Agree
23	Are there other unreasonable restrictions placed on appointing parties by the MSATS procedures that limit or prevent MSATS role appointment to align with the NER requirements at a connection point that AEMO might consider?	Ausgrid suggests that AEMO update the procedures so that it allows LNSP MC to DECLINE a CR if we are incorrectly nominated on a greenfield NMI.
24	Are there issues affecting the installation of metering that could reasonably be resolved by reducing the nominated MC's objection timeframe to zero days in MSATS?	No Comment.
25	Would MCs reasonably be capable of determining whether to object to transfers if the objection period for MC nomination was reduced to zero days?	No Comment.
26	Are there further suggestions on changes to structure to improve the clarity and accessibility of sections 1 to 6 of the MSATS CATS procedures?	No Comment.

Question No.	Question	Participant Comments
27	Do MSATS Participants believe that the proposed changes materially alter the obligations placed on them within the MSATS procedures?	No Comment.
28	Is the change to the reason code in the MDFF necessary?	No Comment.
29	Should other changes be considered to the MDFF to accommodate the changes proposed in this Issues Paper?	No Comment.
30	Is the rationale described in this Issues Paper regarding the proposed timing for implementation reasonable?	No Comment.
31	Are there other considerations or proposals that AEMO might consider regarding the timing for implementation of the proposed changes?	No Comment.

3. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments

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