

# OPERATING PROCEDURE

## NSW-ACT LOST GAS CUSTOMER SERVICE PROTOCOL FOR IDENTIFYING CURRENT RETAILER

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# Executive Summary

This paper explains the gas industry's agreed protocol for finding "lost" gas customers in the NSW & ACT Gas Retail Market — that is, gas customers that have been unable to identify their current gas retailer (retailer).

The process commenced on 9 February 2004 and was updated on 03 November 2014.

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# Introduction

## Background

Since the introduction of Full Retail Contestability (FRC) in the NSW & ACT Gas Retail Market in 2002, there have been a number of incidents where gas customers have been inadvertently transferred to other retailers due to multiple reasons. A contributing factor to this situation occurring was that the affected gas customers had been unable to ascertain the identity of the gas retailer that serviced their gas delivery point.

As a result, and after consultation, industry — initially through AEMO's predecessor the Gas Market Company Limited (GMC) — developed a gas retailer discovery process that would enable a gas customer to contact any retailer, the NSW Division of Resources & Energy (Division) or the Energy and Water Ombudsman NSW (EWON) to find out the identity of their current retailer within 1 business day. This formalised process would ensure that a NSW/ACT gas customer is never placed in a position where they do not know the identity of their current retailer for a sustained period of time.

In 2014 after a consultation with the industry, the Division and EWON, further updates were made to this process. Most of the updates were minor documentation changes, while the process for a gas customer to contact the Division was removed as it was considered redundant. Noting that a customer can contact EWON for these enquiries.

## About this paper

This paper presents a simple 5 step process for all retailers, and EWON in the instance that they receive an enquiry from a "lost" gas customer who is unsure of the identity of their current retailer.

This paper was initially prepared by CGI (formerly Logica), provider of the NSW & ACT gas retail system, for the information and benefit of retailers, the Division and EWON. The Australian Energy Market Operator (AEMO) now has the responsibility for this paper.

## Focus is on gas retailers

It is most likely that a gas customer would contact a retailer in the first instance, as opposed to contacting EWON, to enquire about the identity of their current gas retailer.

It is therefore important that each retailer adequately briefs their call centre(s) and/or other primary customer contact points on the industry-agreed process contained in this document.

The structure of this paper focuses on the process that has been agreed by retailers as it is most likely that they would receive the bulk of the lost gas customer enquiries. In instances where a gas customer directly contacts EWON, the discovery process for gas retailers would also be used by EWON.

## Expected frequency of cases

Cases of lost gas customers are expected to be few compared to the usual type of customer enquiries handled by retailers' call centres on a day-to-day basis. As a result, the process detailed in this paper is designed to be simple and low-cost with minimal administrative burden on retailers.

## Summary of Stakeholder Feedback

This paper incorporates stakeholder feedback received since the release of a background paper on 12 December 2003, and has been updated for a new step in the process (commencing 11 February 2004) whereby AEMO will — in addition to informing the lost gas customer of their current retailer — also inform the appropriate retailer of the matter.

Two main changes have been made to the retailer discovery process which should simplify the process for retailers without adversely affecting the speed at which lost customers are informed of the identity of their current retailer:

1. Retailers/EWON can elect either to have AEMO telephone the lost customer to inform them of their current retailer (the “default” scenario for retailers at the commencement of the process on 9 February 2004), or to take on the responsibility themselves and telephone lost customers to inform them of their current retailer (the “opt-in” scenario). The election is made for all future lost customer enquiries, and can be changed from time to time by notifying AEMO via the retailer discovery email address.
  - Those retailers/EWON who wish to reduce workload on this issue in respect of a lost customer of another retailer can opt for AEMO to contact the customer (i.e. the “default” scenario).
  - Those retailers who wish to maintain the relationship with the lost customer, a desire expressed by some retailers in previous consultation, can do so (i.e. the “opt-in” scenario).
2. Retailers no longer need to issue a follow-up written letter to the customer after the customer has been informed of their current retailer.
  - It was accepted that this unnecessarily complicated the process and elimination of the requirement removes the possibility of a competing retailer mailing the customer unsolicited marketing material.

Note that retailers/EWON continue to be the party responsible for logging the lost customer's details and providing the relevant customer information to AEMO.

The process documented in this paper commenced on 9 February 2004.

## Overview of Gas Retailer Discovery Process

### 5 Step process

This section provides a high-level overview of the 5 step gas retailer discovery process for all NSW & ACT retailers and EWON.

### Overview of process

In broad terms, AEMO will contact lost customers to inform them of their current retailer, unless a retailer/EWON has “opted-in” and expressed a desire to do this themselves. Whenever a gas retailer receives an enquiry from a lost gas customer wanting to know the identity of their current gas retailer, irrespective of whether the gas customer holds a current gas account with the gas retailer or not:

1. The retailer/EWON will record the customer’s relevant personal details;
2. The retailer/EWON will lodge a retailer discovery query by email with the gas market operator, AEMO;
3. AEMO will identify the customer’s current retailer from the NSW & ACT gas retail market system;
4. AEMO will notify the lost gas customer of their current retailer (i.e. the “default” scenario) and notify the appropriate retailer/EWON of the matter, or this contact role would be performed by a retailer/EWON that has “opted-in”; and
5. Where the retailer/EWON contacts the customer (i.e. the “opt-in scenario), the retailer/EWON will notify AEMO by email to confirm that the customer has been informed of the identity of their current retailer, and that it will dispose of or otherwise handle the customer’s personal details as required to satisfy consumer privacy provisions.

### Detailed process

The balance of this paper is dedicated to providing further detail on each of the above 5 steps in order for NSW & ACT retailers and EWON to establish the necessary internal capabilities to handle lost gas customer enquiries.

For the purpose of assisting retailers/EWON with the process that is to be followed, a gas retailer discovery process “checklist” has been attached to the back of this document as Appendix A.

## **Step 1: Retailer/EWON Records Customer Details**

### **(a) Establish telephone contact with customer**

It is assumed that all lost gas customer enquiries would arrive by telephone and would be handled by retailers'/EWON's customer call centres.

If, however, a lost gas customer enquiry arrives via email (or letter), it is advised that the retailer/EWON in the first instance establishes telephone contact with the customer to confirm that the emailing party has obtained the proper authority to enquire into the identity of a gas retailer servicing a particular gas delivery point. This could be done by either:

1. Telephone, where the customer has provided their telephone contact details in their original email; or
2. Email reply, directing the customer to the gas retailer's/EWON's customer call centre for assistance.

### **(b) Retailer/EWON reads customer a privacy statement**

Before the retailer/EWON records any personal customer information for the purpose of facilitating the gas retailer discovery process, the retailer/EWON must quote to the customer an appropriate privacy statement as required by law.

The retailer's/EWON's privacy statement must include a clear explanation of:

1. The free service that the retailer/EWON is offering the customer;
2. How the retailer/EWON will use the customer's personal information, including that the information would be disclosed to the gas retail market operator to facilitate the retailer discovery process; and
3. How and when the retailer/EWON will dispose of the customer's personal information.

The customer must accept the terms and conditions of the privacy statement before the retailer/EWON is permitted to record the customer's personal details. If the customer withholds their consent, the retailer/EWON must advise the customer that the retailer/EWON can no longer assist them with the retailer discovery process.

### **(c) Retailer/EWON to establish that telephone caller has authority to act**

The retailer/EWON must establish that the telephone caller (or emailing party):

1. Is the gas account holder for that gas delivery point; or
2. Resides at the street address for which they are enquiring; or
3. Has obtained the authority from the gas account holder to act on their behalf.

If none of the above conditions can be met, the retailer/EWON must advise the telephone caller that he/she must obtain the authority of the gas account holder before the retailer/EWON can assist any further.

#### **d) Retailer/EWON to record customer details**

For the purpose of facilitating the gas retailer discovery process, the retailer/EWON must record the following customer details:

1. Name of the telephone caller;
2. Gas delivery point identifier (if known);
3. Street address of the property with the gas connection;
  - Include name of building in relation to unit blocks (if available).
  - Include name of a neighbouring suburb (if available).
4. Postal address of the gas customer; and
5. Daytime telephone number of telephone caller.

**Note:** A lost gas customer's current retailer cannot be determined in the absence of information on either points #2 or #3 above. It is therefore crucial that the retailer/EWON obtains information on at least one of these criteria from the gas customer for the retailer discovery process to commence.

#### **(e) Retailer/EWON to contact customer**

The retailer/EWON is to advise the lost gas customer that they will be contacted within 1 business day to advise them of the identity of their current gas retailer.



## Step 2: Retailer/EWON Contacts AEMO

### (a) Retailer/EWON lodges email query with AEMO

After the retailer/EWON has recorded the customer's personal details, the retailer/EWON is to lodge an email query with AEMO at the following address:

[retaildiscovery@aemo.com.au](mailto:retaildiscovery@aemo.com.au)

### (b) Retailer/EWON to send email to AEMO in the standard format

In order to minimise administration costs for both the retailer/EWON and AEMO, all emails sent by the retailer/EWON are to be composed in the following format:

#### Gas Customer's Details:

1. Name of the telephone caller<sup>1</sup>:
2. Gas delivery point identifier (if known):
3. Street address of the property with the gas connection:
  - Include name of building in relation to unit blocks (if available).
  - Include name of a neighbouring suburb (if available).
4. Date gas customer lodged their enquiry with the gas retailer:

#### Gas Retailer's/EWON's Details:


1. Name of retailer:[not applicable for EWON]
2. Name of retailer's/EWON's contact officer:
3. Telephone number of retailer's/EWON's contact officer:
4. Email address of retailer's/EWON's contact officer:

### (c) AEMO to send email reply to retailer/EWON

AEMO is to conduct a sweep of its email inbox twice daily: the first sweep is to occur at 10.30am, followed by a second sweep at 3.30pm. AEMO is to send an acknowledgement

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<sup>1</sup> The name of the gas customer (i.e. the telephone caller) is only required by AEMO where the retailer/EWON has requested that AEMO telephones the customer to inform them of their current retailer. Where the retailer/EWON has elected to telephone customer, this field can be left blank.



receipt by reply email to the retailer/EWON within 1 hour of conducting a sweep of its email inbox.

It is important to note that all reply emails sent by AEMO to the assisting retailer/EWON will be sent to the same email address that was used by the retailer/EWON to lodge its query on behalf of the lost gas customer.

### **Disruption to email services?**

Email is the agreed medium for communications between retailers/EWON and AEMO. In situations where either a retailer, EWON or AEMO experiences disruption to its email services during the processing of a lost gas customer's query, telephone and/or fax communications are to be used as a substitute for email.

AEMO's company contact details are provided in full at the back of this document (see section on "Further Information").

## Step 3: AEMO Sources Customer's Retailer

### (a) AEMO discovers gas customer's current retailer

After receiving the retailer's/EWON's email query, AEMO is to source the identity of the lost gas customer's current retailer.

AEMO will do this by utilising one of two possible means, depending on the type of customer information that has been provided to it by the retailer/EWON:

1. In cases where the gas delivery point identifier is known:
  - By querying the NSW & ACT retail gas system; or
2. In cases where the gas delivery point identifier is unknown, but the street address of the property with the gas connection is known:
  - By interrogating the relevant network operator's system on-line (where on-line system access is available); or
  - By liaising directly with the relevant network operator by fax or email (where on-line system access is not available).

### (b) AEMO to send email to retailer/EWON in the standard format

In order to minimise administration costs for the retailer, EWON and AEMO, AEMO will send all reply emails to retailers/EWON that have "opted-in" in the format below. Note that this only applies in situations where the retailer/EWON has elected to telephone the customer to inform them of their current retailer (i.e. the "opt-in" scenario). Where the retailer/EWON has requested that AEMO telephones the customer (i.e. the "default" scenario), no further emails will be sent to the retailer/EWON.

#### **Gas Delivery Point Identifier & Retailer Details:**

1. Retailer query number (allocated by AEMO to track multiple retailer queries that may be in progress simultaneously):
2. Gas delivery point identifier:
3. Name of retailer currently servicing the gas delivery point:

**(c) AEMO to email retailer/EWON within certain timeframes**

Under the “opt-in” scenario, AEMO is to send an email reply to the retailer/EWON with information about the identity of the lost gas customer’s current retailer in accordance with the following timeframes:

1. By 3.30pm, where the retailer’s/EWON’s email has been retrieved by AEMO during its 10.30am sweep of the email inbox that same business day; or
2. By 10.30am, where the retailer’s/EWON’s email has been retrieved by AEMO during its 3.30pm sweep of the email inbox on the previous business day.

## **Step 4: Retailer/EWON or AEMO Contacts Gas Customer**

### **(a) Retailer/EWON or AEMO to telephone gas customer within certain timeframes**

AEMO<sup>2</sup> or the retailer/EWON<sup>3</sup> is to telephone the customer to inform them of the identity of the gas retailer that currently services their gas delivery point.

Where the retailer/EWON has elected to telephone the customer (“opt-in” scenario), contact with the customer must be attempted within the following timeframes:

1. By no later than 10.30am, where AEMO’s email has been received by the retailer/EWON by 3.30pm on the previous business day; or
2. By no later than 3.30pm, where AEMO’s email has been received by the retailer/EWON by 10.30am that same business day.

Where the retailer/EWON has requested that AEMO telephones the customer (“default” scenario), AEMO will endeavour to contact the customer as soon as possible and by no later than the timeframes listed above.

This timetable ensures that the lost gas customer is informed of the identity of their current retailer within 1 business day of AEMO commencing work on identifying the customer’s current retailer.

### **b) Retailer/EWON to telephone gas customer**

The retailer/EWON or AEMO is to provide the gas customer with the following details:

1. The name of the gas customer’s current retailer; and
2. A telephone number for the gas customer’s current retailer.

### **(c) AEMO contacts appropriate retailer**

In addition to informing the lost gas customer of their current retailer, AEMO will notify the appropriate retailer of the matter soon after.

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<sup>2</sup> Where the retailer/EWON has requested that AEMO telephones the customer to inform them of their current retailer (i.e. the “default” scenario).

<sup>3</sup> Where the retailer/EWON has elected to telephone the customer to inform them of the customer’s current retailer (i.e. the “opt-in” scenario).

## Step 5: Retailer/EWON Contacts AEMO / Disposes of Customer Details

### (a) Retailer/EWON emails AEMO to confirm that process is complete

Where the retailer/EWON has informed the gas customer of the identity of their current retailer, the retailer/EWON is to send an email to AEMO at the email address below within 1 business day to confirm that:

1. The gas customer has been notified of their current retailer; and
2. The retailer/EWON agrees to comply with the applicable statement in the standard email format below in respect of the gas customer's personal information..

[retaildiscovery@aemo.com.au](mailto:retaildiscovery@aemo.com.au)

### (b) Retailer/EWON to send email to AEMO in the standard format

In order to minimise administration costs for the retailer, EWON and AEMO, AEMO requests that the retailer/EWON sends an email in the following format:

#### **Gas Customer Contacted:**

[Retailer's name/EWON] confirms to AEMO that the gas customer identified below has been notified by telephone by a representative of [Retailer's name/EWON] and informed of the identity of the gas retailer that currently services their gas delivery point.

[Insert one of the statements below as applicable]

\*[Retailer's name] is not the customer's current retailer and agrees to permanently delete from its records all of the gas customer's personal information regarding this matter within 7 business days of this email notification.

\*[Retailer's name] is the customer's current retailer and will handle the gas customer's personal information in accordance with all applicable privacy laws.

\*EWON will handle the gas customer's personal information in accordance with all applicable privacy laws.

1. Retailer's/EWON's query number:
2. Gas delivery point identifier:
3. Date the gas customer was informed of their current retailer:

## **Further Information**

### **Contact AEMO**

The process documented in this paper commenced on 9 February 2004.

If you would like to further information on the gas retailer discovery process, please contact AEMO as per the contact details mentioned on the website:

<https://www.aemo.com.au/About-AEMO/Contact-Us>

## Appendix A: Retailer/EWON Checklist for Finding A “Lost” Gas Customer

### Step 1: Retailer/EWON Records “Lost” Gas Customer Details

**[tick]** Retailer/EWON (call centre) receives telephone call from a lost gas customer wanting to know the identity of their current retailer.

**[ ]** Retailer/EWON to provide the customer with an overview of the gas retailer discovery process, including that the retailer/EWON will endeavour to notify the customer of the identity of their current retailer within 1 business day.

**[ ]** Retailer/EWON to establish that the telephone caller has the authority to act on the matter. That is, the telephone caller must fall into at least one of the following categories:

- They are the gas account holder for the gas delivery point; or
- They reside at the street address for which they are enquiring; or
- They have obtained the authority of the gas account holder to act on their behalf.

If the telephone caller does NOT fall into one of the above three categories, the retailer/EWON must advise the telephone caller that they must obtain the authority of the gas account holder before the retailer/EWON can assist any further. [Retailer/EWON ends retailer discovery process here until such a time that the telephone caller ‘fits’ into one of the above three categories.]

**[ ]** Retailer/EWON must quote privacy statement to the customer:  
Quote appropriate privacy statement, as required by law

**[ ]** Customer must accept privacy statement before the retailer/EWON is permitted to record any personal customer information.

If the customer withholds their consent, the retailer/EWON must advise the customer that the retailer/EWON can no longer assist them with the gas retailer discovery process. [Retailer/EWON ends retailer discovery process here if customer withholds their consent.]



[ ] Retailer/EWON records the customer's personal information:

- Name of the telephone caller (first and last name);
- Gas delivery point identifier (printed on an existing gas bill, if available);
- Street address of the property with the gas connection (full address required where available, please include the name of the building in relation to unit blocks, as well as the name of a neighbouring suburb);
- Postal address of the gas customer (if different from street address); and
- Daytime telephone number of telephone caller (area code and number).

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[ ] Retailer/EWON to advise customer that the retailer/EWON will endeavour to notify the customer of the identity of their current gas retailer within 1 business day.

## Step 2: Retailer/EWON Contacts AEMO

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- [ ] Retailer/EWON to compose an email using the following standard format:

**Gas Customer's Details:**

1. Gas delivery point identifier (if known):
2. Street address of the property with the gas connection:
  - Include name of building in relation to unit blocks (if available).
  - Include name of a neighbouring suburb (if available).
3. Date gas customer lodged their enquiry with the gas retailer:

**Retailer's/EWON's Details:**

1. Name of the retailer/EWON:
2. Name of the retailer's/EWON's contact officer:
3. Telephone number of the retailer's/EWON's contact officer:
4. Email address of the retailer's/EWON contact officer:

- [ ] Retailer/EWON to lodge their email query (in the standard format described above) with AEMO at the following email address:

**retaildiscovery@aemo.com.au**

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### Step 3: AEMO Sources Customer's Retailer

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[No action required by Retailer/EWON]

AEMO to source the identity of the lost gas customer's current retailer.

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[No action required by Retailer/EWON]

AEMO to email Retailer/EWON in the following standard format with details of the lost gas customer's current retailer (where retailer/EWON has elected to telephone the customer to inform them of their current retailer):

**Gas Delivery Point Identifier & Retailer Details:**

1. Retailer query number:
2. Gas delivery point identifier:
3. Name of retailer currently servicing the gas delivery point:

### Step 4: Retailer, EWON or AEMO Contacts "Lost" Gas Customer / AEMO contacts Retailer

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Retailer/EWON to attempt to contact the lost gas customer, within the following timeframes, to inform them of the identity of the retailer that currently services their gas delivery point, where the retailer/EWON has elected to telephone the customer:

1. **By no later than 10.30am**, where the Retailer/EWON has received AEMO's email notification by 3.30pm the previous business day; **or**
2. **By no later than 3.30pm**, where the Retailer/EWON has received AEMO's email notification by 10.30am that same business day.

In addition to the above, AEMO will notify the appropriate retailer of the matter.

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Retailer/EWON to provide the lost gas customer with the following information by telephone, where the retailer/EWON has elected to telephone the customer:

1. The name of the gas customer's current retailer; and
  2. The telephone number for the gas customer's current retailer.
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## Step 5: Retailer/EWON contacts AEMO and Disposes Of Customer Details

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- [ ] Retailer/EWON to compose an email using the following standard format, where the retailer/EWON has elected to telephone the customer:

**Gas Customer Contacted:**

[Retailer's name/EWON] confirms to AEMO that the gas customer identified below has been notified by telephone by a representative of [Retailer's name/EWON] and informed of the identity of the retailer that currently services their gas delivery point.

[Insert one of the statements below as applicable]

\*[Retailer's name] is not the customer's current retailer and agrees to permanently delete from its records all of the gas customer's personal information regarding this matter within 7 business days of this email notification.

\*[Retailer's name] is the customer's current retailer and will handle the gas customer's personal information in accordance with all applicable privacy laws.

\*EWON will handle the gas customer's personal information in accordance with all applicable privacy laws.

1. Retailer's/ EWON's query number:
2. Gas delivery point identifier:
3. Date the gas customer was informed of their current retailer:

- [ ] Retailer/EWON to send their email to AEMO (in the standard format described above), within 1 business day of notifying the lost gas customer of their current retailer by telephone, at the following email address: **retaildiscovery@aemo.com.au**