NEM CUSTOMER SWITCHING

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

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1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the 'NEM Customer Switching' Draft Procedures.

The changes being proposed seek to enable the implementation of efficient delivery of proposed changes to the customer switching process design in the National Electricity Market (NEM).

2. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
	General	A staged transition is proposed, whereby any CR raised prior to the go-live date will be allowed to continue until the end of that CR's life cycle. However, this would introduce system complexities, for participants and AEMO, in maintaining for 3 to 4 months two different set of rules. To eliminate this complexity we suggest a clean start approach whereby all open CRs are cancelled prior to go-live and new CRs are raised just after go-live. We believe that a clean start approach would not have any negative customer experience should the retailer manage the transition appropriately. For example, if in-flight CRs were closed and a new CR opened after go-live then for customers who are happy to transfer on a substituted read then they could be transferred sooner than having to wait for an actual read associated with the Next Scheduled Read Date. On the other hand, should the customer want to transfer on an actual read then this could be achieved by the retailer raising a CR1010 when the Next Scheduled Read Date has passed. Overall, the customer experience for a clean start approach is no worse than a staged approach and can provide an enhanced customer experience through a faster customer transfer should the customer agree to transfer on a substituted read. We also suggest that to minimise impacts of the transition, using any transition

		approach, the start date of this new procedure should be on a Sunday. Therefore, the start date should be either 29 November 2020 or 6 December 2020, with the earlier date preferred because it would allow more time to resolve any issues prior to the start of the Christmas period.
	General	The successful implementation of this change is important to ensure minimal impact to the market and customers who want to change retailers. We therefore suggest that AEMO manages this change as an industry project, which should include management of issues and risks, facilitation of industry testing, developing an industry transition and cutover plan, go-live criteria and readiness reporting.
2.4.m	Metering Data Provider	This clause should make it clearer that a substituted reading is only required when: • a valid change request with a read type code of RR was raised; and • a Data Request has not been received and the Actual Change Date does not align with an actual read date If an invalid CR Code and Read Type Code combination is raised then the MDP should not be obligated to create a substituted reading. Ideally this should be rejected by MSATS or objected by the MDP. The requirement to create a substituted reading is only required when both a Data Request was not received by the MDP and there is not an aligning read to the Actual Change Date. Note that reference to Actual Change Date is more appropriate because the creation of the substituted reading should only occur when the CR status is COMPLETE. We suggest that this clause be updated to: Where a Data Request has not been received for a valid CR Code and Read Type Code combination and the Actual Change Date does not align with an actual read date, for Type

		4A, 5 or 6, then a substituted reading must be provided upon completion of a retail transfer in accordance with the Service Level Procedure (MDP)
4.13.c	Read Type Codes	The example provided in this clause is misleading because the Proposed Change Date for a CR is not the date on which the Special Read is to occur. The date on which a Special Read will occur is dependent on the date nominated in a Special Read Service Order. We suggest that this clause be updated to: In each case the Read Type Code is a direction relating to the Proposed Change Date, noting that a Read Type Code of SP requires a B2B Service Order.
Table 4-M, code PR	Read Type Codes	We note that the term 'Meter Reading' is defined in the glossary as 'Electricity consumption data taken from a meter, regardless of how it is obtained'. This suggests that the metering data must be an Actual. However, we understand that the PR Code is now no longer restricted to an Actual and that the transfer can also occur on substituted metering data, except for CR1040 which can only occur on an Actual. Could you please confirm this? If a transfer can occur on substituted metering data when PR is used then we suggest that the description be updated to: Advice from the New FRMP to the MDP that the transfer is to occur on an existing Actual Metering Data or existing Substituted Metering Data. If the metering data does not already exist then the MDP will not create the Substituted Metering Data and the transfer will not be completed. Note that for CR1040, the transfer can only occur on an existing Actual Metering Data.
Table 4-M,	Read Type Codes	It should be made clearer that a read type code of RR will not result in a field visit, or the

code RR		MDP waiting for a field visit to be completed, in order to obtain an Actual Read. We suggest that part (i) of this description be updated to: The Proposed Change Date, that will become the Actual Change Date for the End User transfer, is to be the date of the substituted metering data if an existing Actual Meter Reading for this date does not exist. Note that the use of this read type code will not result in a field visit.
Table 4-M, code SP	Read Type Codes	It should be made clearer that the transfer will only occur on an Actual Read when the read type code of SP is used. We suggest that this description be updated to: Advice from New FRMP to MDP that a B2B Service Order has been/will be provided to arrange for a physical site visit to undertake a reading to facilitate an End User transfer. The MDP/MPC is to arrange for the Special Meter Reading. If an Actual Meter Reading cannot be obtained then the transfer will not be completed. Applies to type 4A, 5 and type 6 metering installations.
Table 4-N	Valid Combinations of Read Type Codes, Metering Installation Type Codes and Change Reason Codes	We note that the BADMETER objection for CR1000, CR1010, CR1020, CR1023, CR1030 and CR1040 has been removed. Could you please confirm if MSATS will now validate for a valid read type code, CR code, proposed change date and meter type combination as per table 4-N and reject any invalid CRs? If MSATS does not perform all these validations then we suggest that the BADMETER objection be re-instated. If neither of these are adopted then we believe that this will cause inefficiencies in the transfer process.
Table 4-N	Valid Combinations of Read Type Codes, Metering Installation Type Codes and	The first note under table 4-N should have 1023 removed because CR1023 has it's own column in table 4-N.

	Change Reason Codes	We suggest that that this note be updated to: Note: 102X refers to 1020, 1025 and 1029.
6.1.1	Application [1000 1010 1020 1030 1040]	In the initial consultation phase we raised the following: We note that some CR Codes have the words 'move-in' in their title (for example CR1030, CR1040) while others do not (for example CR1000). For the latter it is not clear if these CRs can be used for in-situ only or for both in-situ and move-in. Given that move-in can only transfer on an actual read while an in-situ can transfer on an actual or substituted read, we believe the procedure should be made clearer to identify which CR code can be used for which scenario. AEMO's response was: Whilst AEMO agree with the intent to provide clarity, AEMO are cautious about limiting CR labels that may be exclusionary. We also noted that no change was made based on our feedback. Currently all transfers must occur on an actual read, therefore there is little impact if the incorrect CR code was used. However, in future transfers must continue to occur on an actual read for certain scenarios, eg move-in transfers, while in other scenarios the transfer can occur on substituted read, eg in-situ transfers. We believe that the procedures should clearly define which CR code should be used for which scenario to avoid confusion and poor customer experience. Making the procedure silent on this matter will lead to participants defining their own definitions. For example with the CR1000 and CR1010 currently silent, a participant could take the view that there is no restriction on the scenario it could be used for and therefore could use these CR codes for a move-in using a substituted reading. Although this against the principle of the new transfer design, it would not be against the

		procedure because the procedure is silent on this matter. We suggest that each CR code clearly defines the scenario it is allowed to be used for. See our comments below for each CR code.
6.1.1 CR1000	Application [1000 1010 1020 1030 1040]	The term Special Read is not a defined term and for ease of reading and to avoid confusion, the description of each CR should have a consistent structure. We suggest updating the description to: Prospective Day – a date nominated by the new FRMP for the transfer to occur on actual or substituted metering data, as defined by the Read Type Code. Applies to all Metering Data Type and must not be used for a move-in scenario.
6.1.1 CR1010	Application [1000 1010 1020 1030 1040]	For ease of reading and to avoid confusion, the description of each CR should have a consistent structure. We suggest updating the description to: The date of transfer is on a Retrospective Day – a date that aligns with the Previous Read Date, which can be either actual or substituted metering data. The Metering Data Type must be Manually Read and must not be used for a move-in scenario.
6.1.1 CR1020	Application [1000 1010 1020 1030 1040]	CR1020 is an error correction CR. For consistency we suggest that details of CR1020 be moved to section 6.2 and remove the words 'small NMIs' from the title of section 6.2
6.1.1 CR1020	Application [1000 1010 1020 1030 1040]	For ease of reading and to avoid confusion, the description of each CR should have a consistent structure. We suggest updating the description to the following if it is maintained in section 6.1:

		The date of transfer is on a Retrospective Day – a date that is agreed between the Current FRMP and New FRMP provided that it aligns with actual or substituted metering data. Applies to all Metering Data Type. We suggest updating the description to the following if it is maintained in section 6.2: Used where the actual transfer date was in error and the Current FRMP and New FRMP have agreed on new transfer date.
6.1.1 CR1030	Application [1000 1010 1020 1030 1040]	For ease of reading and to avoid confusion, the description of each CR should have a consistent structure. We suggest updating the description to: The date of transfer is on a Prospective Day – a date nominated by the new FRMP for the transfer to occur on actual metering data. Applies to all Metering Data Type and must be used for a move-in scenario.
6.1.1 CR1040	Application [1000 1010 1020 1030 1040]	For ease of reading and to avoid confusion, the description of each CR should have a consistent structure. We suggest updating the description to: The date of transfer is on a Retrospective Day – a date nominated by the new FRMP for the transfer to occur on actual metering data. Applies to all Metering Data Type and must be used for a move-in scenario.
6.1.2.b	Conditions Precedent	This clause does not align with what is described in section 6.1.1. We suggest that this clause be updated to:

		For Change Reason Code 1000, 1030 and 1040 the NMI Classification Code is SMALL or LARGE. For Change Reason Code 1010 the NMI Classification Code is SMALL. For Change Reason Code 1020 the NMI Classification Code is not SMALL.
6.1.7	Objection Rules	We note that the DATEBAD objection is not available for CR1010. Could you please confirm if MSATS will validate for a valid proposed change date with the Previous Read Date? If MSATS does not perform this validation then we suggest that the DATEBAD objection be re-instated. If neither of these are adopted then we believe that this will cause inefficiencies in the transfer process.
6.1.7	Objection Rules	We note that the MDP may raise a NOACC objection for CR1040. However CR1040 cannot have a read type code of SP therefore this objection code is not appropriate. We suggest that the NOACC objection be removed from CR1040.
6.2.8	Objection Rules	For easier reading and consistency the allowable objection codes should be listed in alphabetical order within each table.
6.2.8	Objection Rules	We note that the MDP may raise a DECLINED objection for CR1029. However the MDP cannot be nominated for CR1029 therefore this objection code is not appropriate. We suggest that the DECLINED objection be removed from the MDP for CR1029.

3. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments

4. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
5. Glossary	Manually Read	This is not listed in the glossary. We suggest that this be added.
5. Glossary	Meter Data Type	This is listed twice in the glossary. We suggest deleting one of the entries.
5. Glossary	Previous Read Date	We note that the term 'Meter Reading' is defined in the glossary as 'Electricity consumption data taken from a meter, regardless of how it is obtained'. This suggests that the metering data must be an Actual. However, we understand that the Previous Read Date can correspond to either actual or substituted metering data. If this is correct then we suggest that the term 'Meter Reading' should not be used to define Previous Read Date. The current definition suggests that only one date will be held and therefore displayed to the retailer when they perform NMI Discovery. However, we understand that MSATS will display all the reading dates it has available within a defined period. This means that there may be more than one read date provided during NMI Discovery. IF our understanding is

		correct then we suggest that this definition be updated to make this clearer. We suggest the following definition: Dates corresponding to actual metering data or substituted metering data held within MSATS for an accumulation datastream