

NEM CUSTOMER SWITCHING

DRAFT REPORT AND DETERMINATION

Published: **December 2019**





NOTICE OF SECOND STAGE CONSULTATION – NEM CUSTOMER SWITCHING

National Electricity Rules – Rule 8.9

Date of Notice: 20 December 2019

This notice informs all Registered Participants, Metering Providers, Metering Data Providers, Embedded Network Managers, Ministers and the Australian Energy Regulator (AER) (Consulted Persons) that AEMO is conducting a consultation on the proposed amendments to the Market Settlement and Transfer Solution (MSATS) Procedures and Meter Data File Format (MDFF) Specification NEM12 & NEM13 to implement efficient delivery of proposed changes to the customer switching process design in the National Electricity Market (NEM).

This consultation is being conducted under clause 7.16.7 of the National Electricity Rules (NER), in accordance with the Rules consultation requirements detailed in rule 8.9 of the NER.

Invitation to make Submissions

AEMO invites written submissions on this Draft Report and Determination (Draft Report).

Please identify any parts of your submission that you wish to remain confidential, and explain why. AEMO may still publish that information if it does not consider it to be confidential, but will consult with you before doing so.

Consulted Persons should note that material identified as confidential may be given less weight in the decision-making process than material that is published.

Closing Date and Time

Submissions in response to this Notice of Second Stage of Rules Consultation should be sent by email to NEM.Retailprocedureconsultations@aemo.com.au, to reach AEMO by 5.00pm (Melbourne time) on 29 January 2020.

All submissions must be forwarded in electronic format (both pdf and Word). Please send any queries about this consultation to the same email address.

Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Publication

All submissions will be published on AEMO's website, other than confidential content.

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EXECUTIVE SUMMARY

The publication of this Draft Report and Determination (Draft Report) commences the second stage of the Rules consultation process conducted by AEMO on proposed amendments to the Market Settlement and Transfer Solution (MSATS) Procedures under the National Electricity Rules (NER).

On 17 October 2019, AEMO published the Notice of First Stage Consultation and the Issues Paper for this package of amendments, called the NEM Customer Switching.

The Issues Paper detailed proposed amendments to:

- General changes for all 1000 series CRs.
- Prospective transfer of the FRMP role.
- Retrospective transfer of the FRMP role.
- Transfer of the FRMP role at connection points within embedded networks.
- Facilitating cooling-off reversal of a FRMP change.
- Changes to error correction 1000 series CRs.
- MC appointment objections (6000 series CRs).
- Improvements to procedure drafting.
- The Meter Data File Format (MDFF) Specification NEM12 & NEM13 (MDFF).

AEMO received 26 submissions (including 4 late submissions) from retailers, customer advocates, Distribution Network Service Providers (DNSPs), Meter Providers (MPs), Metering Data Providers (MDPs) and ombudsmen. AEMO also held 8 meetings/forums as per the following table:

Meeting/forum	Topic	Held with	Date
Meeting	Issues Paper	AGL	11/11/2019
Meeting	Issues Paper	Australian Energy Council	12/11/2019
Meeting	Issues Paper	EnergyAustralia	21/11/2019
Meeting	Issues Paper	Simply Energy	18/11/2019
Participation forum	Issues Paper	Consumer Advocates	15/11/2019
Participation forum	Issues Paper	Energy Ombudsman	20/11/2019
Participation forum	Issues Paper	Emerging Retailers	20/11/2019
Participation forum	Last Read Date	Retailers	28/11/2019

From these submissions and its own analysis, AEMO identified 9 material issues. These are addressed in this Draft Report, on the topics of:

- Nomination of multiple roles alongside a change of retailer.
- Notification of a pending role change.
- Objection to customer switches in Victoria based on a certified debt.
- Transfer of the FRMP role.
- Technical solution for the provision of previous read dates and quality.
- Amendments and removal of CRCs.
- Facilitating cooling-off reversal of a FRMP change.



- MC appointment objections (6000 series CRs).
- Timing and implementation.

After considering the submissions and evaluating comments against the requirements of the NER and the Amending Rules, AEMO's draft determination proposes amending various clauses in the MSATS Procedures and MDFF Specification to provide clarity on specific issues highlighted.

AEMO's draft determination is to amend the retail electricity procedures in the form published with this Draft Report. AEMO proposes the changes will take effect from 2 December 2020.



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1. STAKEHOLDER CONSULTATION PROCESS

As required by clause 7.16.7 of the NER, AEMO is consulting on recommended process improvements from proponents and AEMO and updates to various metering procedures to align the procedures with changed rule references in accordance with the Rules consultation procedures in rule 8.9.

AEMO's indicative timeline for this consultation is outlined below. Future dates may be adjusted depending on the number and complexity of issues raised in submissions.

Deliverable	Indicative date
Notice of first stage consultation and Issues Paper published	17 October 2019
First stage submissions closed	22 November 2019
Draft Report & Notice of second stage consultation published	20 December 2019
Submissions due on Draft Report	29 January 2020
Final Report published	26 February 2020

The publication of this Draft Report marks the commencement of the second stage of consultation.

Note that there is a glossary of terms used in this Draft Report at Appendix A.

2. BACKGROUND

2.1. NER requirements

AEMO is responsible for the establishment and maintenance of metering procedures specified in Chapter 7 except for procedures established and maintained under rule 7.17.

The procedures authorised by AEMO under Chapter 7 must be established and amended by AEMO in accordance with the Rules consultation procedures.

2.2. Context for this consultation

2.2.1. Regulatory context

On 3 December 2018, the Australian Energy Market Commission (AEMC) and AEMO provided joint advice to the Council of Australian Governments (COAG) Energy Council about improving the customer switching process in the NEM.¹ The advice considers the related recommendations 8 and 9 of the Australian Competition and Consumer Commission (ACCC) Retail Electricity Pricing Inquiry (REPI) Final Report.² These recommendations are:

- Recommendation 8: AEMO [should] amend its rules and procedures so that losing retailers are only given a loss notification on the actual date of transfer of financial responsibility for the customer to the new retailer. This will limit the opportunity of 'losing' retailers to conduct 'save' activity before a customer transfer has taken place.
- Recommendation 9: The AEMC should make changes to speed up the customer transfer process, for example by enabling customers to use self-reads of their electricity meters. This will ensure that customers move to new offers quickly and will limit the time available for 'losing' retailers to conduct 'save' activities.

¹ AEMO and AEMC *Joint advice: Implementation options for ACCC recommendations 8 and 9 – customer transfers*. Available at: <https://www.aemc.gov.au/market-reviews-advice/aemc-and-aemo-joint-coag-energy-council-advice-customer-transfers>.

² ACCC *Retail Electricity Pricing Inquiry—Final Report*, June 2018. Available at: <https://www.accc.gov.au/>



The AEMC and AEMO joint advice proposes that, in order to efficiently deliver the ACCC recommendation outcomes, a range of actions and changes must be made to the customer switching process to improve, streamline and provide greater transparency for customer switching within the retail energy market. There are a range of issues with the current customer switching process that may be allowing for, or contributing to, opportunities for parties to delay a customer switch and to enable the conduct of a 'save activity'. The AEMC and AEMO also note that the existing customer switching process is outdated (designed at the time that the market first moved to retail competition) and needs review to meet customer expectations and improve retail market competition.

At its December 2018 meeting, the COAG Energy Council endorsed the AEMC and AEMO joint advice and work program to address improving customer transfers.

2.2.2. AEMO High level Design and Rule Change

As a specific action, the joint advice recommended that AEMO produce and submit to the AEMC a high level design (HLD) and associated rule changes to improve the customer switching process, streamline existing processes and improve retail market competition.³

In particular, the HLD and associated rule changes were to:

- Enable a process that allows a customer to transfer retailers within two days after the end of the cooling off period; and
- Have regard to the appropriate timeframes for notification and meter read options. For example, a customer self-read, last billable reads, forecast or substitute and smart meter reads.
- The relevant principles were to be that:
 - There is a simple, easy and timely customer switching process for consumers;
 - The supporting procedures are streamlined, transparent and provide certainty for participants;
 - The obligations for parties are clear, enforceable and can be reported on;
 - Any changes have regard to the implementation and ongoing costs; and
 - The HLD and associated rule changes were also to take into account and consider:
 - Customer protection issues, including billing and contract information; and
 - Energy billing and settlement, and enforcement arrangements including reporting of breaches by the AER.

On 24 May 2019, AEMO submitted a rule change request to the AEMC to amend the NER and the National Energy Retail Rules (NERR). A detailed HLD paper which set out AEMO's proposed changes to AEMO's MSATS Procedures was provided to the AEMC and published alongside the rule change proposal.⁴ The draft determination was published on 26 September 2019.

³ AEMO and AEMC *Joint advice: Implementation options for ACCC recommendations 8 and 9 – customer transfers*.

⁴ AEMC Reducing customers' switching times (retail) RRC0031. Available at: <https://www.aemc.gov.au/rule-changes/reducing-customers-switching-times-retail>



The AEMC draft determination comments that the draft rule:

...will, or is likely to, contribute to the achievement of the NEO and [National Energy Retail Objective (NERO)] for the following reasons:

- by facilitating AEMO's high level design, the amendments made to the NER are likely to improve the...transfer process by removing regulatory and administrative processes that were outdated and contributing to delays and failed transfers.
- the clarifications made [in the AEMC Determination] regarding the use of estimate reads for final bills and the amendment made to the model terms and conditions for standard retail contracts will increase transparency and certainty within the transfer process.

...also meets the "consumer protection test" of the NERO...by strengthening the...protections in the model terms and conditions for standard retail contracts relating to customer transfers.⁵

More generally, the AEMC:

- ...reiterates its support for AEMO's procedure changes from its joint advice to COAG...in particular [supporting] the move to...remove features of the customer transfer process where the losing retailer is notified in advance of a customer changing retailer. The [AEMC] does not consider this is a feature of a well-functioning market. As a general principle, the market transfer processes should not facilitate retailers conducting save activity. This is consistent with the [AEMC's] recommendations in the 2014 Review of Electricity Customer Switching, and subsequently the ACCC's recommendations in the [Retail Electricity Pricing Inquiry (REPI) – Final Report, June 2018].

On 17 October 2019, AEMO published the Notice of First Stage Consultation and the Issues Paper for this package of amendments, called the NEM Customer Switching.

2.2.3. Context for MSATS procedural and system changes

MSATS procedures define the roles and obligations of participants and AEMO, facilitating and supporting an efficient process for the:

- Provision and maintenance of MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations Standing Data;
- Discovery of approved NMI Standing Data;
- Transfer of retail customers between retailers;
- Registration of metering installations; and
- Settlement and administration of NMIs.

In the context of customer switching, there are two MSATS Procedures that require amendment to accommodate the changes proposed in this Draft Determination:

- MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations - that apply to customer connections in the NEM; and
- MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs – that apply to wholesale connections in the NEM.

⁵ AEMC Determination, section 2.4, page 9. The AEMC made the Determination in response to AEMO's request on 23 May 2019, to consider making a rule change under section 91 of the National Electricity Law.



Processes and systems which facilitate the customer switching experience were designed at the time that the market first moved to retail competition. These processes and systems have not significantly changed since this time. Therefore, in order to realise the outcomes of the joint advice and AEMC Rule Change process, key changes to the MSATS Procedures and associated systems are required. At a high level, these changes can be categorised into:

- Amendments supporting a change in the FRMP (refer section 4.4);
- Related MSATS procedural changes (refer to draft procedures supplied with this consultation);
- Consequential changes to the Meter Data File Format (refer to draft procedures supplied with this consultation); and
- Timing for implementation of the proposed changes to AEMO procedures and systems (refer to section 4.9).

This Draft Determination makes reference to:

- NER version 124;
- MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations version 4.8;
- MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NEMs version 4.8;
- Meter Data File Format (MDFF) Specification NEM12 & NEM13 version 1.06;
- Retail Electricity Market Procedures – Glossary and Framework version 2.2.

2.3. First stage consultation

AEMO issued a Notice of First Stage Consultation on 17 October 2019, and published an Issues Paper for the NEM Customer Switching. This information is available on [AEMO's website](#).

The Issues Paper included details on AEMO's stakeholder engagement in the course of developing the initial draft procedures, including various proposals that were discussed at consultative forums with industry representatives. The Issues Paper included a summary of the specific amendments proposed in the initial consultation pack. To help stakeholders and other interested parties respond to this Issues Paper, AEMO published a draft of MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations and Meter Data File Format (MDFF) Specification NEM12 & NEM13 incorporating the changes AEMO proposes for consultation on 31 October 2019.

AEMO received 26 submissions in the first stage of consultation, 4 of which were a late submission.

AEMO also held 8 meetings/forums as per the following table:

Meeting/forum	Topic	Held with	Date
Meeting	Issues Paper	AGL	11/11/2019
Meeting	Issues Paper	Australian Energy Council	12/11/2019
Meeting	Issues Paper	EnergyAustralia	21/11/2019
Meeting	Issues Paper	Simply Energy	18/11/2019
Participation forum	Issues Paper	Consumer Advocates	15/11/2019
Participation forum	Issues Paper	Energy Ombudsman	20/11/2019
Participation forum	Issues Paper	Emerging Retailers	20/11/2019
Participation forum	Last Read Date	Retailers	28/11/2019



Copies of all written submissions (excluding any confidential information) have been published on AEMO's website at: <https://aemo.com.au/Stakeholder-Consultation/Consultations/NEM-Customer-Switching?Convenor=AEMO%20NEM>.

3. SUMMARY OF MATERIAL ISSUES

This section details the material issues AEMO identified during the review process. It also provides AEMO's assessment of the issues and how AEMO proposes to address them.

The key material issues arising from the proposal and raised by Consulted Persons are summarised in the following table:

No.	Issue	Raised by
1.	<u>Nomination of multiple roles alongside a change of retailer</u>	Multiple Respondents
2.	<u>Notification of a pending role change</u>	Multiple Respondents
3.	<u>Objection to customer switches in Victoria based on a certified debt</u>	Multiple Respondents
4.	<u>Transfer of the FRMP role</u>	Multiple Respondents
5.	<u>Technical solution for the provision of previous read dates and quality</u>	Multiple Respondents
6.	<u>Amendments and removal of CRCs</u>	Multiple Respondents
7.	<u>Facilitating cooling-off reversal of a FRMP change</u>	Multiple Respondents
8.	<u>MC appointment objections (6000 series CRs)</u>	Multiple Respondents
9.	<u>Timing and implementation</u>	Multiple Respondents

A detailed summary of issues raised by Consulted Persons in submissions, together with AEMO's responses, is contained in Appendix B.

4. DISCUSSION OF MATERIAL ISSUES

4.1. Nomination of multiple roles alongside a change of retailer

4.1.1. Issue summary and submissions

The MSATS Procedures currently enable a retailer to initiate a customer switch and to nominate changes to the roles of Metering Coordinator (MC), Metering Provider (MP) and Metering Data Provider (MDP) within the one CRC. In the case that one or more of these roles is nominated in the CRC, the nominated party may raise an objection on the basis that they decline the appointment. If one of these parties' objects to their appointment for whatever reason the completion of the customer switch suspends, or is cancelled.

AEMO considered that it was unreasonable to delay or cancel a customer switch as a result of any such objection being raised. Two options were considered to remove the risk of delay or cancellation:

- Option 1: Limit the scope of customer switching CRs in MSATS, so that only the retailer role is changed in the transfer process.
- Option 2: Remove the ability for Metering Coordinators to object to appointment. As MSATS Procedures enable retrospective correction of role changes, removing this objection right might be considered reasonable providing it could be corrected should an error occur.

AEMO proposed to adopt Option 1 - to amend all customer switching CRs in order that they only facilitate a change of retailer at the connection point, noting that over the full year 2018, very few customer switches (less than 0.1%) also included a change of MC within the retailer transfer CR and that appointment of MC, MP and MDP can be performed once the customer transfer had been completed, via a 6000 series CR.



The AEMO proposal was generally supported by distributors and some Metering Coordinators, however retailers favoured a retention of the ability to appoint the MC at the same time as the completion of a customer switch. Whilst the appointment of a new MC at a NMI occurs very rarely, retailers cited costly system changes to effect the proposed change as well as a desire to have the capability to appoint their preferred MC without having to raise 6000 series CRs. Simply Energy proposed that the Option 2 presented in the AEMO Issues Paper would remove the need for significant system and process change and would meet the desired objective (MC role appointment not delaying the switch) providing that there was no right provided to the MC to object to such a proposed role change. Simply Energy contend that as so few MCs are changed alongside a customer switch, it was reasonable to remove the ability for MC objection on the basis that if an MC was incorrectly nominated, the matter could be resolved post customer switch completion.

4.1.2. AEMO's assessment

On consideration of retailer submissions, AEMO recognises that the proposal to proceed with Option 1 is likely to be more costly for retailers to implement than the alternative Option 2.

The version of Option 2 detailed by Simply Energy provides a customer outcome equivalent to Option 1 (objections to role appointment which have the capability to delay or cancel the customer switch are eliminated), whilst limiting changes to retailer systems and processes.

It is reasonable to consider that retailers are incentivised to nominate correct MCs in MSATS, to ensure:

- compliance with the NER (clause 7.2.1) – which requires the retailer to appoint an MC at a connection point; and
- ongoing provision of service, quality and cost outcomes as determined through commercial agreements between the MC and the appointing retailer.

Incorrect nomination of an Initial MC (distributor MC) needs specific consideration as these MCs can only provide MC services at type 5, 6 or 7 metering installations.

AEMO notes that no substantive case was presented in favour of nominating MP and MDP roles in a 1000 series CR.

4.1.3. AEMO's conclusion

AEMO has determined to adopt the Option 2 proposal in the form suggested by Simply Energy, which would enable the MC role to be nominated in a 1000 series CR. The MC would not have the ability to object to any such nomination and any incorrect nominations would need to be addressed by the retailer following completion of the customer switch.

The MSATS Procedures will include provisions which restrict the nomination of MC such that an Initial MC cannot be nominated as a NEW MC at a connection point, unless they are also the Current MC in MSATS. As a result, any incorrect appointment of an Initial MC could be remedied as corrective actions resulting from a breach of the MSATS Procedures and would not need to rely on other dispute mechanisms. Should a retailer seek to nominate the Initial MC at a connection point following a customer switch, via a 6000 series CR, that CR would be subject to objection processes.

Should a retailer incorrectly nominate an MC, the retailer can nominate the MC that they have appointed (in accordance with NER clause 7.2.1) and make the nomination retrospective to the date of the customer switch via a 6000 series CR.

AEMO considers that Option 2 presents no greater risk of incorrect appointment than Option 1, with the possibility of a dispute arising over incorrect nomination in the CRC being ostensibly the same as a dispute under Option 1, should the retailer fail to nominate their appointed MC following the customer switch completion.



4.2. Notification of a pending role change

4.2.1. Issue summary and submissions

The MSATS Procedures require notifications to be sent to roles associated with a connection point at various stages of a CRs progression (e.g. REQUESTED, OBJECTED, PENDING, COMPLETED). Notifications of a customer switch are provided to the current retailer regardless of whether the market framework requires them to receive such a notification.

As discussed extensively in the ACCC REPI final report, a notification of a customer switch is often used by the current retailer to conduct 'save' activity. The ACCC made specific recommendations for AEMO to remove notifications of a customer switch to prevent 'save' activity from occurring.

AEMO proposed that prior to CR completion, notifications related to 1000 series CRs should be limited to:

- the party raising the CR (e.g. the new retailer); and
- parties which are provided with a right within the market framework to object to a role change prior to its completion.

Energy Consumers Australia (ECA) commented that save activity has several negative outcomes for consumers and supported AEMO's proposal. ECA referenced the ACCC submission to the AEMC consultation on this matter, highlighting that the "competitive dynamics in the NEM's retail markets has given rise to strategic retention activity that increases costs and provides little benefit to consumers", and that these costs are ultimately passed on to all consumers, increasing prices. DNSPs also broadly supported the AEMO proposal.

Support for the proposal was mixed amongst retailers; some actively supporting the change commenting that no regulatory risks would be introduced as a result, whilst others commented that the removal of notifications might lead to confusion for customers in some circumstances, with AGL and Red/Lumo Energy commenting that the lack of notification of a pending customer switch is likely to prevent them from being able to comply with other obligations in the NER and NERR.

Detail provided in submissions to AEMO indicate that this concern is regarding works or actions planned to be performed at the connection point, in particular regarding planned disconnections. EnergyAustralia commented that a retailer might raise a disconnection service order, but when informed of a pending customer switch choose to cancel the service order prior to disconnection. If notification of a customer switch is not provided to the current retailer until customer switch completion, the losing retailer would not be able to cancel the disconnection (or other planned works) ahead of time.

Origin Energy submitted that the proposal removes the ability of current retailers to manage customers that are most at risk of falling into debt or customers who are uncertain which retailer they have signed with. Origin commented that once a hardship customer switches retailer, they are no longer eligible for the hardship support on their previous plan and that notification of intention to transfer to the current retailer will allow the retailer to contact that customer and provide an opportunity to assess debt repayment options and minimise the possibility of entering into a new contract that does not recognise a customer's hardship status.

Some MCs requested that notifications continue to be sent to MCs, MDPs, MPs and DNSPs in order that any pending service work might be suspended or cancelled.

4.2.2. AEMO's assessment

The removal of the notification of a pending customer switch will mean that the current retailer has no advanced knowledge of a customer switch. When a retailer changes at a connection point in MSATS, it occurs on the midnight boundary. As a result, the completion notification is provided to the losing retailer and other affected participants at the very start of the day that the customer moves to the new retailer.



Any work planned and performed on behalf of the losing retailer prior to that point would have been performed under their authority. If the losing retailer has arranged for work to be undertaken following receipt of a notification of a completed customer switch, it is reasonable to consider that they would have processes in place to prevent that work from proceeding. Accordingly, AEMO has not identified requirements in the NER or NERR that a losing retailer cannot reasonably comply with providing that they act on the customer loss notification in a timely fashion.

AEMO agrees with retailers who commented that the completion or cancellation of planned service work needs to be considered if a customer is also seeking to switch retailers at or around the same time. AEMO notes that in the majority of cases, the customer or their agent (e.g. electrician, solar panel system installer) is engaged in planning that activity and it is reasonable to consider that they are unlikely to be confused; rather, the certainty provided under AEMO's proposed changes regarding the date of customer switch, will enable activities to be better coordinated in advance and is likely to assist the prospective retailer if playing a role in the coordination.

AEMO considers that matters regarding hardship are not the subject of AEMO's MSATS procedures and are instead matters to be considered by the AEMC. AEMO notes that matters regarding customer protections have been raised to the AEMC by AEMO and are being considered in the AEMC's Reducing Customers' Switching Times rule change consultation.

Provision of a notification to any other party in order that they might suspend or cancel planned work is problematic for reasons including:

- It is not clear to AEMO that the service provider (e.g. MC, MDP, and MP) has sufficient authority under the NER or NERR to suspend work planned by the current retailer if they receive a notification of a pending customer switch.
- Notifying parties contracted to the current retailer of a pending customer switch, might lead to the forwarding of the notification to the current retailer to determine whether to proceed with service work, thereby circumventing the removal of the notification and enabling 'saves'.

As MCs, MPs and MDPs receive notification of a completed customer switch, it is possible for retailers to establish agreements whereby no retailer planned work is undertaken upon receipt by one or more of those parties regarding a completed customer switch.

AEMO received feedback from a couple of DNSPs who indicated that they would proactively cancel work on any pending retailer planned disconnection, upon receipt of a notification of a customer switch.

4.2.3. AEMO's conclusion

AEMO considers that there are mechanisms that can be employed by retailers and their service providers to minimise risk of confusion to customers, or of any service works being undertaken inappropriately, without the need for a notification of a pending customer switch.

AEMO considers that the removal of the notification will prevent 'save' activity and be beneficial to retail competition and customers, consistent with the ACCC REPI recommendations.

Accordingly, AEMO has determined to remove notification to parties as originally proposed.



4.3. Objection to customer switches in Victoria based on a certified debt

4.3.1. Issue summary and submissions

In Victoria, provisions exist that enable the current retailer to object in cases where a certified debt exists.⁶ The MSATS Procedures facilitate a process by which a current retailer in Victoria may suspend the progress of a proposed customer switch by a new retailer where it identifies that the customer has a certified debt.

On average, of the approximately 213,000 customer switches in the NEM per month, 600 (~0.3%) are objected to on this basis. Annually, most retailers raise very few (between 0-50) objections of this type, with four to five retailers consistently raising the majority of these objections.

Currently, the process by which the suspension of a transfer occurs is as follows:

- A prospective retailer raises a 1000 series CR to commence the customer switch in MSATS;
- The MSATS system provides a notification of the pending change to the current retailer;
- The current retailer has one full business day following this notification to consider whether it has justification to object on the basis of a certified debt; and
- As a result:
 - If an objection is raised by the current retailer, the proposed customer switch does not proceed; or
 - If no objection is raised, the proposed transfer progresses as planned by the prospective retailer.

The current process is reliant on the retention of an objection mechanism in the customer switching process and a notification of a pending customer switch to the current retailer. For reasons outlined elsewhere in this document and the Issues Paper, these mechanisms are inconsistent with the broader objectives of the proposed changes.

AEMO proposed to remove the current objection mechanism and replace it with a process to re-instate the previous retailer following the completion of a transfer in MSATS upon identification of a certified debt. This would provide a facility for the losing retailer to have a specified timeframe to raise a 'DEBT' CRC which has the effect of reversing the customer switch (in Victoria only) in a manner similar to an error correction CRC in MSATS. The CRC would not be subject to objection.

This proposal would ensure that customer switches across the NEM can follow the same process regardless of the region in which the customer resides, whilst maintaining the ability for the retailer who has a certified debt with a customer in Victoria to cancel a customer switch.

Submissions provided on this subject were mostly in favour of the proposed change, with Red/Lumo being the only party advocating for retention of the existing mechanisms including notification of the losing retailer of a pending switch (matters discussed in section 4.2 of this paper).

The AEC and Origin Energy highlighted potential confusion for customers that might be created as a result of the proposed change, noting that the customer is likely to be provided with conflicting information from the two retailers involved in the process following a reversal. Specifically, Origin Energy noted that the completion of the original customer switch (prior to the reversal) is likely to trigger communications to the customer including welcome packs and that the reversal (as a result of a certified debt) will trigger communications to the customer confirming that the switch has been cancelled.

Simply Energy commented that the ability to reverse the customer switch should only apply to in-situ customer switches, consistent with the use of the current mechanism. EnergyAustralia and Momentum

⁶ Essential Services Commission, Electricity Customer Transfer Code, 13 October 2014, clause 5.1 (page 6)



Energy commented that the proposed timing of one business day to raise a reversal CRC in MSATS was insufficient.

4.3.2. AEMO's assessment

Removal of the current mechanism is critical to ensure that consistent processes can be used for customer switching across the entire NEM and that all customers located in Victoria are not subjected to customer switching delays.

The proposed change does allow the original transfer to complete in market systems and then be reversed when a certified debt is identified by the losing retailer, rather than being blocked from completion as the current mechanism facilitates. As a result of this, AEMO recognises that the customer might receive conflicting information subsequent to a switch reversal as noted by the AEC and Origin Energy. AEMO considers that retailers might need to prepare for such an eventuality, including assessing the content of the material sent to customers notifying of a switch reversal to minimise any risk of confusion. More broadly, AEMO considers that the likelihood of confusion is limited as a result of the retailer to customer communication prior to the customer switch activity occurring, which is needed to justify the customer as having a certified debt.

Simply Energy are correct to highlight that the proposed mechanism for reversal should not apply to move-in customer switches, as a customer moving in to a property cannot have a certified debt at that connection point.

Regarding the timeframe to assess whether the 'lost' customer has a certified debt and raise a reversal CRC (one business day), the timeframe proposed is no different to the timeframe provided to raise an objection under the current mechanism. Retailers have one business day currently, AEMO has retained that timeframe in the proposal. AEMO notes that alternative error correction CRCs can be used after the one business day, with the agreement of the new retailer in the unlikely event that a case of certified debt is not identified in time and the losing retailer is still seeking a reversal.

AEMO notes that the current mechanism might be exploited by a retailer seeking to delay a customer switch where no case of certified debt exists, buy time in order to perform an assessment of the same, or delay the customer switch for any other purpose. For example, a retailer could automatically object to a customer switch upon it being raised by a prospective retailer and take the following objection clearing period (20 days) to perform an assessment. AEMO does not consider that such an action is in the interest of customers', nor would it be consistent with the requirements of the MSATS Procedures regarding the use of the debt objection mechanism. Changing the process as proposed by AEMO might have the effect of reducing the volumes of cases of certified debt to only those that are confirmed by the affected retailer as legitimate.

4.3.3. AEMO's conclusion

AEMO has determined to progress as proposed - to introduce a new CRC to enable the reversal of a customer switch in place of the current objection mechanism. The CRC will be able to be raised no more than one business day following the completion of a customer switch.

AEMO agrees that the reversal should only be facilitated following the completion of an in-situ customer transfer and proposes to introduce MSATS validation that would prevent its use in other circumstances.

4.4. Transfer of the FRMP role

4.4.1. Issue summary and submissions

Mechanisms exist that enable both prospective and retrospective changes to the FRMP at a connection point in MSATS. These mechanisms formalise the customer switch in market systems.



Prospective FRMP role change (in-situ customer)

Prospective customer switches for in-situ customers are managed via the CRC 1000, which is the most commonly used CRC to support a change of the FRMP role (approximately 49% of all customer switches per annum).

AEMO identified issues with the current design of the CRC 1000 which create a material barrier to the completion of a customer's decision to change retailer, which included:

- the need for a meter reading to be obtained before the change to the role of FRMP at a connection point can occur in all cases;
- the reliance on the use of the Next Scheduled Read Date (NSRD) as the vehicle to provide that meter reading for manually read metering installations; and
- restrictions imposed through MSATS procedures which limited retailer's ability to switch customers during the cooling-off period (this is considered further in section 4.7).

AEMO presented an amended design for prospective FRMP role changes that removed the barriers described above and proposed that the current CRC1000 be reconfigured to accommodate the new design. A reconfiguring of the CRC 1000 was preferred to a replacement of the CRC 1000 with newly created CRCs for reasons including the likely scale of change for participants and the simplicity of transition (including avoiding the need to revert to customers regarding expectations set under current mechanisms).

Specifically, the amendments to the CRC 1000 would enable customer switching to be facilitated via specification at 'Read Type Code' level as follows:

- RR (Read Required) – will facilitate prospective customer switches that will complete on the date specified by the incoming retailer (which can be as early as the next calendar day). Subsequent to the completion of the customer switch, the MDP will be required to provide either a substituted meter reading (for connection points that have manually read metering installations), or a remotely collected meter reading (for connection points that have remotely read metering installations). This Read Type Code would be applicable for metering types 1-6.
- SP (Special Reading) – will facilitate prospective customer switches for connection points with manually read metering installations where the customer or the incoming retailer has specifically requested that a meter reader make a physical visit to obtain a reading from the meter (e.g. via a special read request). This CRC will continue to require a CRC 1500 from the MDP to enable completion. This Read Type Code would be applicable for metering installation types 4A, 5 and 6. This is consistent with current practice in the use of the SP Read Type Code.
- The NSRD and other Read Type Codes would be retired on the implementation date, but those raised prior to implementation date would be able to be completed using current processes.

AEMO recognised that a customer switch arranged via the SP Read Type Code will not guarantee an efficient or timely customer switch due to the same issues which exist today – including the increasing costs of providing a manual reading in response to a special read request being raised, the time taken to obtain a reading; and the risk that attempts to obtain a read fail. However, unlike the use of the NSRD, AEMO considered that it is reasonable to retain the option to access an on-demand meter reading service in the case that a physical reading is explicitly requested by a customer and agreed with the incoming retailer.

Submissions mostly supported AEMO's proposal to retain and reconfigure the CRC 1000, in many cases supporting AEMO's rationale for this proposal. There was also widespread support for the continued access to special readings to facilitate a customer's request to switch via an SP read type code.

AEMO received no direct feedback on the proposed changes to process regarding the delivery of reading following the completion of the customer switch when using the 'RR' read type code.



AGL broadly supported the proposed changes. AGL emphasised that when practicable, actual meter readings should be obtained in favour of estimate readings. AGL proposed that any estimation provided for a manually read interval meter be marked as a 'Final' estimation. AEMO understands that the proposal would require the estimate to be 'locked' at a point in time and not updated when actual meter readings are subsequently obtained through the cyclic meter reading process. Such a process would eliminate the need for retailers to issue credits or to rebill the customer once actual meter data becomes available (noting that subsequent collection of accurate historical interval meter data is a feature specific to manually read interval metering installations).

AEMO notes that under current data management requirements in AEMO Procedures, any estimated interval metering data provided as a 'Final' reading would be replaced with actual readings if obtained in the future. As a result, marking the data as 'Final' would not 'lock' the data and make it unchangeable, and would therefore not limit the likelihood of the retailer having to rebill or issue credits as appropriate.

There were mixed views regarding AEMO's proposal for the NSRD to no longer be used to facilitate customer switches. ECA strongly supported AEMO's proposals, commenting that they will deliver better consumer outcomes and will increase the competitive pressure on retailers to deliver better and more affordable services. Endeavour Energy provided a summary of the available options by which a retailer might seek to perform a customer switch, commenting that all scenarios had been catered for which provide an equal or better outcome to the customer than the use of the NSRD as an option for customer switching.

The AEC and a number of retailers submitted that the use of the NSRD should be retained as an option, particularly if the NSRD is indicatively scheduled in the near future (the NSRD indicates that an attempt to obtain a reading will be scheduled on or within two business days either side of the NSRD).

EnergyAustralia expanded this concept, proposing that an 'adjusted NSRD' process be established whereby an NSRD could only be used providing that the published date for the NSRD was within the next 10 to 12 business days. EnergyAustralia made the case that in this way, the use of the NSRD is similar to the use of a special reading request, without the potential of incurring any associated costs.

A range of parties commented that retention of the current read type code of 'EI' (Existing Interval) would reduce costs of implementation as it is commonly used to obtain readings from MDPs to facilitate customer switching where remotely read interval metering is installed at the NMI. It was proposed that the use of the read type code would have the same effect and would be used as an alternative to AEMO's proposed option of the 'RR' read type code.

ERM Power noted that smart metering installation would enable better switching read options and proposed that deployment of smart meters would in itself have positive effects on switching efficiency and that AEMO's proposed changes were not necessary.

Retrospective FRMP role change (in-situ customer)

Retrospective role-change CRs (raising a CR for a change of role on a date that has passed) make up approximately 15% of all retailer transfers in the NEM. The majority of these retrospective role changes are for CRC 1040's which are designed to enable a retrospective change of the FRMP role, aligned to a date in the past 10 business days (which could be raised for the current day if a CR is scheduled to complete no earlier than the day following the current day) where a new customer has moved into a property.

A small number of retrospective changes relate to error corrections (CRCs 1024 and 1025); or reinstating the old retailer due to an incorrect retailer transfer, typically as a result of the customer not agreeing to the transfer or the retailer transferring the wrong customer. The error correction can be for a date up to 130 business days in the past. Obligations for resolution of FRMP transfers in error are established in the National Energy Retail Rules (NERR) and the MSATS procedures provide mechanisms to support correction. These longer term errors require mutual agreement between the two retailers involved in for the correction to proceed.



AEMO considered that the current facility to transfer retrospectively should be broadened and made simpler to enable in-situ customers to access the benefits of using a recently-obtained reading to facilitate their decision to switch retailers.

AEMO proposed that benefits of enabling the use of a recently-obtained reading to support a customer switch are likely to include:

- For the customer:
 - That the new retailer arrangements commence from the date of their last bill, meaning that they will not have to deal with bills from the old and new retailer over the same period and outside of the usual billing cycle; and
 - Confidence in the accuracy of the reading as the customer has already had the opportunity to dispute and otherwise validate their bill.
- For the losing retailer:
 - There is no need to issue a final bill, save for notifying the customer of the cessation of their services;
 - Exposure to the wholesale market is limited to the date of the last bill to the customer; and
 - The risk of rebilling the customer, for additional charges or to issue a credit is reduced.
- For the prospective retailer:
 - The ability to establish an arrangement with the customer from the date of the last bill; and
 - Confidence in the accuracy of the reading as the customer has already had the opportunity to dispute and otherwise validate their bill.
- For both losing and prospective retailer:
 - As the reading used for the last bill has already been established, there is no need to generate a new reading.

AEMO considered matters which might require limitations being placed on the timeframe within which a previous reading could be used to facilitate a customer switch other than for longer term, retrospective error corrections, specifically:

- Losing retailer exposure regarding contract position – a retailer could become exposed to unreasonable risk if a substantial number of customers transferred away from them retrospectively in any settlement period; and
- Customer credit / payment plans – if a customer has set up a payment plan, or predictable monthly payment schedule with their retailer, they may have been billed, and paid for energy based on those arrangements, outside of a quarterly reading cycle. For example, a customer which has established a monthly payment arrangement may not be billed based on a quantity of energy per month, rather the agreed amount is billed per month, and their account is adjusted at intervals based on meter readings obtained. The customer is credited back for overpayment or invoiced for underpayment. In these circumstances, a customer transfer on the last billable read would in most cases require the losing retailer to provide the customer with a credit, unless a time limit was placed on the automatic application of a previous read.

AEMO proposed that whilst the contract position risk to a retailer can be mitigated by retailers' retention, marketing and service offerings and competitiveness, there is potential for confusion regarding any



established payment plans, if the ability to transfer on a last reading date is likely to interfere with that cycle in most cases.

Submissions provided widespread support for AEMO's proposal to introduce the ability to retrospectively transfer using a previous read date and confirmed AEMO's view that to enable this successfully, provision of previous reading dates and reading quality information was necessary. Retention of the NSRD in NMI discovery was also well supported. DNSPs requested that AEMO consider retaining the CRC 1010 for retrospective transfers to reduce system changes and associated costs, rather than combining retrospective changes with the CRC 1000.

Mixed views were provided for AEMO's consideration regarding the limits of the retrospective timeframe that could be available to a retailer to perform a customer switch. Amongst retailers, AGL and Momentum Energy advocated for an extension from the proposed 15 business day timeframe to 40 business days in order that it could be more commonly applied and reduce the need to switch customers on estimate meter readings. Many retailers provided comments in support of AEMO's proposed 15 business day restriction, however Simply Energy recommended restricting the period to 10 business days, referring to the issue considered by AEMO regarding payment plans and the potential confusion for customers if a winning retailer's offer could not be applied retrospectively (e.g. a product or price is not applicable prior to a particular date). ECA proposed that the mechanism be available for the entirety of the last reading cycle for manually read metering installations (i.e. a previous read date over the preceding 3 calendar months – approximately 62 business days) to maximise the opportunity for the previous read switch option to be available to customers.

There were also mixed views on whether to apply retrospectivity in the manner described to remotely read metering installations (e.g. smart meters) in addition to the proposed application for manually read metering installations. The AEC and a number of retailers were not in favour of enabling retrospective transfers for customers with remotely read metering installations, citing amongst other things that there appears to be no practical benefits of enabling this, and that retailers should not be able to switch a customer with such a connection on a date prior to obtaining explicit informed consent to commence the switch. Some retailers, including Origin Energy and Simply Energy proposed that as the date of obtaining explicit informed consent might be considered to be a retrospective day in MSATS, this should be available to select as the date of transfer but no date prior. Consumer advocates, including ECA and PIAC considered that retrospectivity should be enabled for customers with remotely read metering installations. This view was supported by some distributors and some retailers.

4.4.2. AEMO's assessment

AEMO has documented the problems resulting in the use of the NSRD for customer transfers in the rule change request and associated high level design for reducing customer switching timeframes⁷. In summary, the use of an NSRD provides no certainty to either the customer or the retailer that a proposed customer switch will take place on a specified date, or that it will take place at all. This is true regardless of whether the notified NSRD is within 10 to 12 days or 2 to 3 months from the date upon which the retailer obtains explicit informed consent to commence the switch. If a process were enabled to allow for the use of the NSRD as proposed by EnergyAustralia and other retailers, in addition to the more generic problems with retention of the NSRD, its use would be extremely limited. For example, as a standard quarterly reading cycle has approximately 62 business days, at any given time on a simple average only 16% of potential customer switches for customers with manually read metering installations would fall into a 10 to 12 days window. In practice it is likely that the actual number will be far smaller, as AEMO understands that many customers proactively seek alternative retailer offers upon receiving a bill, which in the majority of cases will mean that the NSRD is months away, rather than days.

⁷ AEMC Reducing customers' switching times (retail) RRC0031. Available at: <https://www.aemc.gov.au/rule-changes/reducing-customers-switching-times-retail>



As highlighted in the associated rule change request, currently MSATS reports indicate that average timeframes from the initiation of a customer switch to completion in AEMO systems for customers with manually read metering installations stands at approximately 10 days. AEMO understands that it has become common practice for prospective retailers to hold back the initiation of a transfer request until a date close to the scheduled meter reading regardless of the fact that this practice is in breach of the MSATS procedures⁸. This has the effect of hiding the total elapsed time between obtaining customer consent to commence a switch and the switch completion. It is reasonable to consider that in establishing a mechanism as proposed for the retention of the NSRD in customer switching, AEMO might create an opportunity for one or more retailers to inadvertently continue current practices on an ongoing basis and thereby not offer the benefits of the proposed changes to customers.

AEMO acknowledges that some retailers have reservations regarding the use of estimate readings for customer switches for in-situ customers with manually read metering installations. Despite widespread use in like-markets overseas, it is currently uncommon for a customer switch in the NEM to be performed using an estimated meter reading. AEMO presented a case in support of the use of estimates in the rule change request to the AEMC and in lieu of information which demonstrates that AEMO's analysis was inaccurate, considers that the use of estimates is a reliable and effective method to improve customer switching timeframes.

AEMO agrees with ERM Power's comment regarding the practical advantages to customer switching as a result of smart metering deployment; amongst other things, where retailers deploy smart meters, retailers need not rely on estimates to perform customer switches. AEMO has considered the effect of smart meter rollout on customer switching in the rule change proposal to the AEMC, and notes that in itself it does not provide a solution to the vast majority of small customers in the NEM who do not currently have remotely read metering installations.

The ability to use a previous reading date for manually read metering installations might enable retailers to reduce the need to perform customer switches using estimated readings, as well as enabling customers to retrospectively obtain access to better pricing. This was reflected in submissions from ECA, AGL and Momentum Energy. An extension of AEMO's proposed 15 business day limit within which a previous read date can be used would provide retailers further scope to avoid the use of estimated readings. However, any extension to this limit requires reconsideration of the effect on retailers regarding exposure to the wholesale market and potential impacts to customers who are on monthly payment / bill-smoothing plans.

Limited support was provided for AEMO's contention that the timeframe for retrospectivity should be set at 15 business days to avoid confusion to customers on payment plans. ECA submitted that the timeframe for retrospectivity should be extended to a full three-month period to maximise potential benefits to customers. On reflection, AEMO considers that customers on payment plans will not be materially impacted by an extension as their previous retailer is required in the NERR to provide a credit for any overpayment and that this can be used to off-set the next bill from their new retailer for the retrospective period. It is also reasonable to consider that in the process of obtaining explicit informed consent to commence a retrospective customer switch, the gaining retailer will consider such matters to minimise confusion to their prospective customer.

In the Issues Paper, AEMO did not consider that a retailer's potential exposure to the wholesale market was of material concern to the extent that it prevents the use of previous read dates for customer switching. If the timeframe for the use of previous read dates is extended, the potential risk will be increased. AEMO considers that the risk remains low, even if the restriction on the use of the previous read date was extended to a full three-month reading cycle, for reasons including:

- The extension would be limited to manually read metering installations and therefore, small customer connections with limited individual loads;

⁸ AEMO, MSATS Procedures: CATS Procedure Principles and Obligations, section 2.2(b), p. 14.



- Manual reading dates are determined by any specific group of retailer's customers, rather they are determined primarily on the basis of operational efficiency and are proportionately spread across any quarterly reading cycle, limiting the likelihood of a material volume of customers switching away in a manner which leaves a retailer exposed;
- The use of the previous reading is one of many methods by which a competing retailer might determine to perform a customer switch; and
- For gaining retailers, there is no compulsion to offer or to select the use of a previous reading date for a customer switch.

Retailers can limit their own exposure and, as proposed by the ECA's submission, are arguably incentivised as a result of this mechanism to:

- Install remotely read metering at their customers' connection points, thereby removing the opportunity for the use of the previous read date for competitors seeking to win their customers; and
- Retain customers by offering competitive pricing and services.

4.4.3. AEMO's conclusion

As detailed in previous material leading up to this determination, AEMO has identified the use of the NSRD as a key factor in the uncertainty and delay associated with the current customer switching mechanism in the NEM. No new information has been provided that has persuaded AEMO that this assessment is inaccurate. AEMO considers that the use of estimated meter readings is the simplest and most effective method to enable customers with manually read metering installations to access new products and services in no more than two business days. This is borne out by the extensive experience witnessed in like-markets overseas.

The mechanism proposed by AEMO to enable the use of a previous reading date presents an alternative option for retailers, while also benefiting customers. AEMO is persuaded that the proposed restriction of 15 business days within which a previous reading date can be used to facilitate a customer switch for connection points with manually read metering installations is unnecessary. This facility should be extended for a full three calendar months (as proposed by ECA), in order that retailers can reduce their reliance on the use of estimated readings provided at the time of switch request by instead selecting a previous actual reading.

In line with submissions from DNSPs, AEMO will retain the CRC 1010 for retrospective customer switching, for manually read metering installations only, reducing the need for system change and associated costs.

Such an extension is not required for connection points with remotely read metering installations due to the ready availability of prospective readings. However, AEMO considers that there might be value for these customers and retailers to be able to switch retrospectively, for example to enable a customer to switch on the date that the retailer obtained explicit informed consent from the customer (which is likely to be considered as a retrospective date in MSATS), or to align a switch with the date of a recently received bill. This retrospective facility will be established within the CRC 1000 as previously proposed, obtained by use of an RR read type code for a retrospective date within the last 10 business days and shall only be applicable to remotely read metering installations.

AEMO will retain the EI read type code as requested by several participants as an alternative to the RR code, and for remotely read metering installations (type 1-4 metering only). Both RR and EI will be available for use by the retailer and will have the same effect. AEMO notes that no obligation will be placed on retailers to use EI when there is a 1-4 Meter at the connection point; either read type code (EI or RR) could be used by the retailer to achieve the same result.



4.5. Technical solution for the provision of previous read dates and quality

4.5.1. Issue summary and submissions

AEMO proposed to create a new facility in NMI discovery (the MSATS system functionality used by prospective retailers to confirm information with respect to a customer's connection point prior to initiating a customer switch) to display information that would enable a retailer, or their agent, to have visibility of recent reading dates to determine whether that date could be used to facilitate a customer switch. Data identified by AEMO that should be provided in such a facility was as follows:

- The date of the previous reading (Last Read Date); and
- The quality of that reading (e.g. if the reading was a reading by the MDP via a visit to the meter, a substituted reading, etc.) for metering installations that are manually read (Read Quality).

AEMO considered a range of mechanisms for achieving this and proposed a solution by which the creation (schema and MSATS) of the Last Read Date and Read Quality fields available to a prospective retailer at NMI level in NMI Discovery via browser (online access) and batch system (file share or API web service). AEMO proposed that this option requires MDPs to populate the associated fields in MSATS upon each read via the CR process, and that a new CRC would be required. AEMO noted that this option would require a schema change to enable the creation of the necessary fields in MSATS.

The majority of submissions from retailers favoured the option proposed by AEMO, whilst raising concerns over the ability to accommodate implementation of the schema change required in the timeframe for implementation proposed by AEMO (May 2020). DNSPs favoured options that would not require the provision of additional data from MDPs to populate the proposed data fields (previous reading date and quality).

AEMO presented a further variant of the previously provided options to retailer representatives on 28 November 2019, for consideration which avoided both requiring MDPs to provide additional data sets and the need for a schema change. The proposed variant option did not provide the required data within NMI discovery and instead required retailers to request a report for a NMI to obtain the previous reading information. AEMO proposed to use information in AEMO systems to populate the data fields, noting that until the implementation of global settlements changes in 2021, AEMO hold the majority, but not all, of the data required to fully populate the proposed data fields (small customer connection points that are still with the 1st tier retailer are not provided to AEMO in all NEM regions, however AEMO will be in receipt of all metering data in order to operate global settlement.)

Feedback received from retailer representatives confirmed a preference for information to be provided via NMI discovery rather than via a secondary mechanism.

Tango Energy and ReAmped Energy indicated that the availability of previous reading dates and quality would be used to assess the optimal method for performing the customer switch for prospective as well as retrospective switching processes.

4.5.2. AEMO's assessment

Information provided via submissions and through discussions with retailers highlights a strong preference for the previous reading data and quality information to be provided in NMI discovery.

Requiring MDPs to provide additional data in order that previous reading data and quality can be made available, appears unnecessary when most of the required data is already held by AEMO while also introducing a temporary administrative burden on MDP's. Whilst there are gaps in AEMO's data, these will be resolved on the implementation of global settlements in 2021. Utilising AEMO's library of data as a source to support the required data fields has other potential advantages, including the ability to provide



the previous read date over a specified period against each of the three quality 'flags' (i.e. 'A' – Actual, 'S' – Substitute, 'F' Final Substitute).

4.5.3. AEMO's conclusion

AEMO considers that previous reading dates and reading quality should be provided via NMI discovery as proposed in the Issues Paper. Data used to populate the fields will be sourced from AEMO systems, rather than requiring additional data to be provided from MDPs.

Data will be provided in aggregate form where there are multiple data streams at a single connection point (e.g. where there are two meters, each with its own meter reading, AEMO systems will confirm that the date and quality of reading matches across all data streams at the NMI in order to publish an aggregated date and quality data set).

A schema change is required to support this option. AEMO has taken this requirement and associated feedback into account and considers implementation timing in section 4.9 of this paper.

4.6. Amendments and removal of CRCs

4.6.1. Issue summary and submissions

During the Consultation, AEMO proposed a series of changes to other CRCs in MSATS, ranging from minor amendments to complete removal. These changes comprised of the following:

- CRC 1040 – proposal to extend the retrospective period from 10 to 15 business days, to align with other proposed retrospective CRCs.
- Embedded network specific CRCs (1080, 1081, 1082, 1083 and 1084) – remove as AEMO considered that they were not being utilised and were an unnecessary duplication of other standard CR 1000 series CRCs.
- Error correction CRCs:
 - AEMO proposed to remove three (CRC 1022, 1027 and 1028) of the ten error correction CRCs as they are rarely if ever used and are designed to support a very specific set of circumstances that might otherwise reasonably be covered by another existing error correction CRC.
 - AEMO requested views from interested parties on potential changes to other error correction CRCs (i.e. 1020, 1021, 1023 and 1029) to better facilitate resolution of issues and errors for customer switching.

Most submissions supported the extension to the retrospective period for the CRC 1040, and the removal of the embedded network specific CRCs as proposed by AEMO. Simply Energy instead proposed that any other retrospective switching facility be aligned with the current ten business day window for the CRC 1040. AGL and EnergyAustralia proposed that the embedded network specific CRCs be retained pending further information on the AEMCs review and planned rule changes regarding embedded networks.

Most submissions supported the removal of the rarely used CRC 1022, 1027 and 1028. Comments against removal focused on seeking to avoid the costs of CRC deletion in systems, particularly where there might not be a corresponding benefit to customers.

There were few responses commenting on the potential to amend or obtain additional benefit from CRCs 1020, 1021, 1023 and 1029. Endeavour Energy proposed the further removal of the CRC 1021 on the basis that the reduction in the need for CRC 1500 will likely mean that this error correction becomes redundant. Powershop requested that CRCs 1020 and 1023 are not altered as these are used regularly. EnergyAustralia



commented that changes should be made to streamline error corrections as they currently cause delay and dissatisfaction to customers.

4.6.2. AEMO's assessment

The changes proposed for amendments and removals of CRCs in the 1000 series are designed to establish a simple, clear process for the delivery, and if necessary, the correction of customer switches. Retention of legacy, unused or badly designed CRCs is likely to be problematic in the medium to long term for MSATS participants and for new market entrants.

Aligning the retrospective period for the CRC 1040 to the retrospective period for the CRC 1000 ensures continuity it is reasonable to consider that the retrospective period should at least be aligned to the current cooling-off period of 10 business days appears to provide some additional flexibility to retailers and their prospective customers.

AEMO notes that the AEMC has already published rule drafting to effect the changes considered in their review of embedded networks⁹. As a result, the requirements of the NER and how they might impact customer switching is well understood. AEMO based the original assessment of the ongoing need to have embedded network specific CRCs on the outcome of the AEMC's review including the rule change drafting.

AEMO has considered the ongoing requirement to maintain the CRC 1021 (Error Correction – Missed CR1500(Small)) and the CRC 1024 (Transfer Missed (Small)).

CRC 1021 is used where the proposed transfer date has been missed due to the MDP not being able to provide a corresponding Actual Change Date on the original Change Request (CRC 1000, 1010, 1030 or 1040). Approximately 2900 were raised in the previous 12 months. AEMO agrees with Endeavour Energy, that the reduction in volume of CRC 1500s as result of the broader changes to the 1000 series CRs will no longer warrant a specific CRC to cater for this purpose.

The CRC 1024 can be used where a customer has more than one NMI and not all of them were switched by the retailer. The error correction transaction will be used to transfer the other NMI(s) missed. Whilst there are a larger number of CRC 1024s raised in the previous 12 months than many other error correction CRCs (approximately 29,000), AEMO considers that the ability to use standard CRCs (e.g. CRC 1000 and 1010) to switch retrospectively, the need for this correction code has been removed.

4.6.3. AEMO's conclusion

The retrospective time period for the CRC 1040 will be retained at 10 business days which is aligned to the retrospective period to be established in the CRC 1000.

AEMO concludes that there is no case for the current embedded network CRCs to be maintained in MSATS and they will be removed accordingly.

CRCs 1021, 1022, 1024, 1027 and 1028 will be removed from future use as they are either already not used and redundant, or identified as being made redundant as a result of the broader procedure changes and design for the future management of customer switches.

⁹ Updating the regulatory frameworks for Embedded Networks: <https://www.aemc.gov.au/market-reviews-advice/updating-regulatory-frameworks-embedded-networks>



4.7. Facilitating cooling-off reversal of a FRMP change

4.7.1. Issue summary and submissions

AEMO identified that MSATS Procedures currently restrict how a retailer might observe the cooling-off requirements established in the NERR and ESC codes. Currently, MSATS Procedures have restrictions¹⁰, specifically requiring retailers to:

- Ensure that a CR does not complete prior to the end of the cooling-off period relevant to each jurisdiction; and
- Initiate a CR for a customer switch no later than two business days after the conclusion of the cooling-off period.

The MSATS Procedures also include an error correction CR (CRC 1026) which notionally provides for a reinstatement of the previous retailer in the case that either the above-mentioned restrictions are not complied with, or the customer's desire to cool-off is not acted on until after the transfer of FRMP at a connection point has been completed. This CR is problematic in design, as it must be raised by the previous retailer which was not party to the customer switch, or by the instruction from the customer regarding their desire to cool-off.

AEMO considered that the MSATS requirements restricting compliance with cooling-off provisions are unreasonable. AEMO also considered that the current cooling-off CR is overly cumbersome, complex, prone to delay and failure and as such, does not adequately support customers' cooling-off rights.

To better facilitate customers' rights to cool-off, AEMO proposed to:

- Remove the current restrictions from the MSATS Procedures, providing retailers with a choice to complete customer switches within or following the completion of the cooling-off period as provided for in the NERR and ESC codes; and
- Provide a CRC that performs a reversal of a completed 1000 series CR,¹¹ which:
 - May only be raised by the retailer which raised the original and now completed 1000 series CR;
 - Can only reverse a 1000 series CR that has completed within the previous 10 business days; and
 - Requires no approval or action by any other market participant including the retailer which is regaining its customer as a result of the cooling-off regarding the completion of the cooling-off reversal in MSATS.

Submissions were generally very supportive of the proposed removal of restrictions and the proposed mechanisms to perform the reversal.

ERM Power were not supportive of the change, commenting that enabling the reversal of a customer switch on the basis that the customer has cooled-off will burden retailers with cost, regardless of whether they seek to complete customer switches within the cooling-off period or not, as retailers will have to accept transactions for 'returning' customers should they switch away and then cool-off from their agreement with their new retailer. ERM Power commented that facilitating cooling-off as provided for in policy (the NERR and ESC codes) was unwieldy, risky and costly and that until the use of a cooling-off reversal mechanism can be quantified, a manual work around should be provided.

¹⁰ MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations – section 2.2(b).

¹¹ AEMO notes that the First Stage consultation material was not consistently expressed on this point.



Origin Energy suggested that another error correction CRC might be well suited to enable the reversal and that the creation of a new CRC to perform this task was not desirable as it is likely to increase process, systems and training costs as it requires the winning retailer to initiate the cooling-off reversal.

4.7.2. AEMO's assessment

AEMO acknowledges that changes to MSATS procedures to enable retailers how they might best observe cooling-off provisions are likely to require some change of process, systems and staff training. Retailers are able to limit the extent to which they are exposed to change and costs based on how they choose to use the flexibility afforded to them in the applicable cooling-off legislation.

AEMO considers that it reasonable to expect more widespread use of faster customer switches that occur within the cooling-off period following implementation of these procedure changes and that an automated process for reversal is critical in providing retailers confidence that, on offering this outcome to customers, they have a simple method by which a customer's decision to cool-off can be facilitated. Providing a manual work around is unlikely to provide that level of confidence.

4.7.3. AEMO's conclusion

The current restrictions to cooling-off will be removed as proposed in order that retailers can determine the best balance between providing timely switching for customers and the risks of raising reversal CRCs in the event that a customer exercises their right to cool-off.

The mechanism will be provided via a new CRC 1060, separating 'reversal' CRCs from error correction CRCs in MSATS. AEMO considers that this is the most appropriate design as it allows for current and any future reversals to be identified independently from standard role appointments or error corrections.

The proposed reversal methods are notably different in design from error corrections. These design differences result in materially different requirements for elements such as:

- MSATS validation requirements;
- Ability for parties to object to proposed changes; and
- The need for agreement between participants for CRCs to complete.

For example, the new CRC to enable reversal based on identification of a certified debt in Victoria will be a CRC 1061.

4.8. MC appointment objections (6000 series CRs)

4.8.1. Issue summary and submissions

The 6000 series CRs in MSATS provides the facility to appoint a variety of roles to a connection point, including the MC. Currently the MSATS procedures enable MCs to object to an appointment at a connection point using the following codes and reasons:

- **CONTRACT** – May only be used by the current MC at a large connection point, to object to an appointment of a new MC where the current MC is appointed by the large end user and where that contractual agreement takes precedence over the proposed change; and
- **DECLINED** – May be used by the MC proposed to be appointed to a connection point if the MC does not wish to perform the role for which it has been nominated in the CRC.

Reinstatement of the Initial MC at a connection point

AEMO proposed that there might reasonably be circumstances in which a retailer assigns an MC to a connection point in good faith, but in error. In such a circumstance, the retailer might determine to correct the error and reinstate the previous MC. Where both the previous and new MCs are competitive MCs and the connection point is provided by an advanced meter, the appointment correction should be able to be



managed by the retailer through contractual means and this should avoid the need for one or more MCs unreasonably objecting to the appointment.

AEMO considered that the current objection facility is less suited to a situation where the previous MC, which the retailer is seeking to reinstate, is the Initial MC (i.e. the DNSP MC providing manually read metering services to metering installation types 5 and 6). If an Initial MC determines to object using a reason of 'DECLINED', the retailer and newly appointed MC are left in a state of limbo in terms of the provision of MC services at the metering installation, with a competitive MC not having the customer's consent to install metering services that it is registered to provide and the retailer unable to appoint the only party authorised to operate on an ongoing basis as the MC (the Initial MC).

AEMO proposed to amend the use of objection codes for the appointment of MC such that the Initial MC may only use the objection code of DECLINED where:

- The connection point to which it is proposed to be appointed has a metering installation which is other than a type 5 or 6 metering installation; or
- The MP and MDP roles at the connection point have been altered to parties other than the DNSP's MP and MDP; or
- The Initial MC has previously raised a notice of a metering installation malfunction as provided for in clause 11.86.7 of the NER.

The majority of submissions supported the proposed change. AGL commented that the scenario provided by AEMO, where a competitive MC is left 'stranded' at a connection point with type 5 and 6 metering, occurs and that the proposed change will assist in resolving such issues.

Endeavour Energy considered that the proposed change was unnecessary due to low volumes currently experienced and existing processes working well. Both Endeavour Energy and Ausgrid proposed that an additional reason for use of the DECLINED objection by an Initial MC should be added – that the Initial MC can object if the NMI is a greenfield NMI.

Some retailers commented that a notice of metering installation malfunction might not be a reasonable case for objecting to an appointment, indicating that there might be some confusion regarding associated B2B processes.

Objection period for MC appointment

AEMO considered views regarding objection periods for MC role changes discussed in the AEMC's consultation for the Metering Installation Timeframes rule change that concluded in December 2018. The rule change considered issues that might delay the installation of metering equipment to a small customer's connection point, particularly in circumstances where the existing meter at the connection point is a manually read metering installation.

The AEMC's final determination recommended that AEMO:

- Streamline the appointment process in the MSATS system for metering parties in certain circumstances; and
- Reduce the objection period to zero days in cases where an existing accumulation meter or manually read interval meter needs to be replaced with an advanced meter.

AEMO's view, expressed at the time of the AEMC consultation, was that retailers and MCs might see value in a reduction in appointment timeframe in the context of the rule change under consideration. The party which is potentially exposed to risk should the objection period be reduced to zero days is the nominated MC. The nominated MC would have a reduced period of time to determine whether they wish to take on the role to which they are nominated (i.e. the period of time between the CR being raised nominating them to the connection point and the end of that business day).



AEMO did not propose to amend procedures in line with the AEMC recommendations. AEMO understands that the objection period does not act as a material barrier to the installation of metering as considered more broadly in the AEMC's rule change discussed above.

PLUS ES responded in favour of a reduction across all 6000 series CRs, confirming that a reduction in objection period to zero days did not unreasonably restrict MC's from raising objections, but could lead to more efficient processes. All other respondents provided submission supporting AEMO's view that no change was necessary at this time.

4.8.2. AEMO's assessment

The procedural restrictions on objecting to an appointment as Initial MC appear to be complete and do not need further extension. Under the proposed provisions, the Initial MC is already provided with an opportunity to prevent appointment at a greenfield NMI, since a greenfield NMI must have all roles appointed on creation and that the DNSP is the party who performs creation. Therefore, the DNSP can ensure that the Initial MC is not inadvertently nominated on creation. Post creation, the DNSP will have the ability to object using DECLINED as the nominated MDP and MP will be other than the Initial MC's MDP and MP, and in scenarios where a meter has been installed at the NMI, it must be other than a type 5 or 6 metering installation due to the provisions in NER clause 7.8.3.

AEMO notes that where Initial MC's already have established processes, where volumes of re-appointment are low and a common understanding with retailers, it is possible that little change to process or system will be required to comply with the amendment.

AEMO considers that it is reasonable for the Initial MC not to be nominated to return to the role of MC at a NMI where a metering installation malfunction has been notified, as this is inconsistent with the requirements of NER 11.86.7. The Initial MC is best placed to determine whether a metering installation has been identified as having a malfunction.

4.8.3. AEMO's conclusion

The changes to the DECLINED objection code will be established in MSATS Procedures as proposed, without further amendment.

No changes will be made to the one-day objection timeframe currently available to MCs within the 6000 series CRs.

4.9. Timing and implementation

4.9.1. Issue summary and submissions

AEMO noted that system modifications to facilitate the changes proposed in the Issues Paper were expected to be deliverable by AEMO at the end of the first quarter in 2020. Accordingly, AEMO proposed that implementation of systems and procedures should be aligned to the May 2020 MSATS release.

AEMO noted that when determining the implementation timing, AEMO recognises the importance of balancing the opportunity to deliver benefits to customers as soon as possible as a result of the proposed changes, whilst acknowledging that:

- Retailers will need to make alterations to process and staff training to take advantage of the changes and deliver the benefits to customers; and
- MDPs will have to make changes to processes to ensure data is delivered to enable a smooth transition.

A range of views were expressed in submissions, the majority of which suggested that the timelines proposed by AEMO were not achievable. A number of retailers and the AEC favoured implementation



sometime in the fourth quarter of 2020. Parties including Red/Lumo Energy, SA Power Networks and United Energy favoured implementation following the planned implementation of five-minute settlements (i.e. after July 2021).

ECA and PIAC commented that AEMO's proposed timeframe was appropriate; ECA commenting that the changes should be made as soon as practicable given the benefits to be gained by customers.

4.9.2. AEMO's assessment

AEMO has made a series of amendments to the design provided in the Issues Paper which will reduce the amount of change required to implement the improvements to customer switching. For example, MDPs are no longer required to provide previous read date and quality information and the CRC 1010 and the read type code 'EI' are being retained to minimise changes for a number of participants. The 1000 series re-design is based on the current framework and new facilities in many cases do not have to be adopted by participants who do not wish to use them. For example, the use of the previous read date is provided as a solution for those retailers that wish to utilise it. Similarly, the procedures do not mandate that retailers have to adopt the Victorian certified debt reversal CRC and the CRC for cooling-off reversal unless they want to exercise their rights to do so.

The most material change for MSATS participants is related to the schema change required to make available the previous read data and read quality information in NMI Discovery. AEMO recognises that schema changes can affect all parties using the schema, regardless of whether they benefit from the changes made to the schema at any given time. Accordingly, it is common practice for AEMO to schedule multiple changes for a range of activities into a single schema change when it is practicable to do so. AEMO notes that the next planned schema change is scheduled for early December 2020 to delivery requirements for the five-minute settlement program of work.

4.9.3. AEMO's conclusion

AEMO has determined to delay the implementation in order that it can align with the planned schema change in December 2020 for the five-minute settlement program of work.

AEMO considers that whilst this will delay the delivery of benefits to customers, the potential impact to participants as a result of performing a schema change ahead of the planned December 2020 schedule would be unreasonable. Aligning this work with the five-minute settlement schema change means that there is no additional disruption to participants than that already planned for.

AEMO notes that the December 2020 timing is equal to, or longer than the requirements specified in the majority of retailer submissions and considers that retailers will have more than sufficient time to accommodate and plan for implementation.

AEMO considers that it is unreasonable to delay provision of the benefits of improved customer switching to customers beyond the planned implementation of five-minute settlements in July 2021, in particular when considering the changes made in response to submissions to the Issues Paper as discussed in 4.9.2 above.

5. OTHER MATTERS

In determining the methodologies and mechanisms that a retailer will have at its disposal when considering how best to progress a customer switch, AEMO must also determine the method by which the timeframe for customer transfers to complete might be recorded, monitored and if required, reported on.

The current MSATS Procedures contain requirements which specify the point at which a customer switch must be raised by way of a CRC in MSATS by a retailer, and how that relates to the date upon which a customer provides explicit informed consent for that switch to proceed (MSATS CATS Procedure v4.7 section 2.2(b)). These requirements have been amended in order that the MSATS Procedures allow



retailers to select the most appropriate method to perform a switch, whilst enabling AEMO to record and measure timeframes within which customers are being switched from one retailer to another.

AEMO has amended the MSATS Procedures in order that the timeframe provided to retailers to raise CRCs applies differently depending on whether the retailer is switching a customer prospectively or retrospectively, as follows:

- For prospective switches, the retailer must raise the CRC in MSATS no later than one business day of obtaining informed consent from the customer.
- For retrospective switches, the retailer must raise the CRC in MSATS no later than one business day following the end of the relevant cooling-off period.

AEMO notes that compliance with these requirements allow retailers with the flexibility to use customer switching processes to best meet their customers' needs whilst enabling the timeframe for completion of customer switching activity to be reported on.

For example, retailers can seek to switch a customer via methods including:

- A prospective switch (facilitated by the delivery of a special reading, or subsequent to the switch completing, a remotely read meter reading, or estimated reading) and AEMO systems will record the total elapsed time from the point of raising the CRC to its completion with a maximum variance of + one business day.
- A retrospective switch (up to 65 business days in the past for manually read metering installations, or 10 business days for remotely read metering installations) in order to use a previous read date, or to wait for the cooling-off period to end before applying a switch back in time to the start of the cooling-off period. AEMO systems will record the length between the point of raising the CRC and the retrospective date upon which the switch has completed.
- Retailers can seek to switch a customer on an NSRD that is due in the very near future (as requested by some retailers in section 4.4, by holding the transfer in abeyance for the length of the applicable cooling-off period (currently 10 business days) and retrospectively applying the date of transfer upon identifying that the NSRD has yielded a meter reading over that period. AEMO systems will record the point of raising the CRC, the retrospective date upon which the switch completes and whether the NSRD yielded a successful reading on that date.

AEMO will, from time to time, consider requesting information from retailers to demonstrate their compliance with these requirements, to ensure that outcomes for customers can be monitored and enforced if necessary.

The NER requires compliance with MSATS, provides that AEMO may notify retailers of breaches and requires AEMO to advise the AER and relevant jurisdictional authorities of ongoing breaches.

6. DRAFT DETERMINATION

Having considered the matters raised in submissions and at meetings/forums, AEMO's draft determination is to amend various retail electricity procedures in the form published with this Draft Report, in accordance with Chapter 7 of the NER. There are 4 published draft retail electricity procedure documents:

- MSATS Procedures: CATS v4.9 Draft Determination Change Marked;
- MSATS Procedures: CATS v4.9 Draft Determination Clean;
- MSATS Procedures: WIGS v4.9 Draft Determination Change Marked;
- MSATS Procedures: WIGS v4.9 Draft Determination Clean;
- Meter Data File Format Specification NEM12 & NEM13 v1.07 Draft Determination Change Marked;



- Meter Data File Format Specification NEM12 & NEM13 v1.07 Draft Determination Clean;
- Retail Electricity Market Procedures - Glossary and Framework v2.3 Draft Determination Change Marked; and
- Retail Electricity Market Procedures - Glossary and Framework v2.3 Draft Determination Clean.



GLOSSARY

Term or acronym	Meaning
ACCC	Australian Competition and Consumer Commission
AEMC	Australian Energy Market Commission
CATS	Consumer Administration and Transfer Solution, a part of MSATS
COAG	Council of Australian Governments
CR	Change Request
CRC	Change Reason Code
DNSP	Distribution Network Service Provider
ESC	Essential Services Commission
FRMP	Financially Responsible Market Participant
GSL	Guaranteed Service Level
HLD	High Level Design
LNSP	Local Network Service Provider
MC	Metering Coordinator
MDFF	Meter Data File Format
MDP	Metering Data Provider
MP	Meter Provider
MSATS	Market Settlements and Transfer Solution
NMI	National Metering Identifier
NEM	National Electricity Market
NER	National Electricity Rules
NERR	National Energy Retail Rules
NSRD	Next Scheduled Read Date
REPI	Retail Electricity Pricing Inquiry
WIGS	Wholesale, Interconnector, Generator and Sample NMIs

SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

Table 1 Issues Paper - General changes for all 1000 series CRs

No.	Question	Consulted person	Issue	AEMO response
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?				
1.	1	AGL Energy	<p>We support AEMO's view that it is not reasonable that the erroneous appointment of new Metering Coordinator (MC), Metering Provider (MP) or Metering Data Provider (MDP) by a prospective retailer should give rise to the opportunity for delay or cancellation of a customer switch.</p> <p>In this context, AGL supports Option 2 (Removal of the ability of Metering Coordinators to object to appointment) as the most efficient option to nullify the risk of delay or cancellation to the switching process.</p> <p>We consider that the ability to nominate the roles of MC, MP or MDP should be retained within the one Change Reason Code (CRC) as this provides the most efficient mechanism to nominate both the Financially Responsible Market Participant (FRMP) and MC during a customer transfer. Option 1 requires significant system and process re-design and introduces a secondary step for the MC nomination, which increases the complexity of the transfer process and therefore the chances for transfer errors. Therefore, Option 1 (to limit the scope of switching Change Requests (CRs) in MSATS) should not be preferred as it increases the risk and costs of the transfer process and is not in the long-term interest of consumers.</p>	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.
2.	1	Ausgrid	<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>	<p>AEMO notes the support for the proposed changes and refer to response in Table 1 item 18.</p> <p>In addition, AEMO acknowledge the comments on retrospective transfers and intends to keep the CR1010 but apply the CRC only to manually read meters. The CR1000 will apply to remotely read meters and contain</p>



No.	Question	Consulted person	Issue	AEMO response
				retrospective and prospective capability.
3.	1	AusNet Services	AusNet Services is supportive of the change to limit 1000 series Change Request transaction to a change of FRMP only, and we are not aware of any additional considerations. This change would not impact our transactional systems and processes. Making this change is important in limiting the scope of implementing these procedure changes.	AEMO notes the support for the proposed changes.
4.	1	ACT Civil and Administrative Tribunal	<p>The ACAT notes that the ACT has some features which might result in the proposed changes having different impacts in the ACT when compared to other NEM jurisdictions. For example:</p> <ul style="list-style-type: none"> The ACT has a high seasonal usage of electricity in winter at peak periods because of residential heating. In winter, a quarterly electricity bill for a high residential user in the ACT can be as much as \$1,000 to \$1,500, which may lead to problems in allocating estimated usage and consumption costs between the gaining and losing retailers. In the ACT, when a meter reader attends a property, they read all three meters – electricity, gas and water. Accordingly, in the ACT utility bills are usually aligned. In its paper, AEMO has only considered electricity transfers and has not analysed possible impacts on dual fuel customers (electricity and gas), who are common in the ACT. The ACAT suggests this analysis should be included in AEMO's consideration of its final position on transfers. <p>The ACAT notes that retailers in the ACT often offer dual fuel discounts. When a delay in transfer occurs, or if electricity and gas bills become misaligned, this could potentially affect the discount that the consumer expects to receive from their retailer.</p>	<p>AEMO notes that NSRD across Electricity and Gas are not always aligned. This procedure will provide the flexibility for providing dual fuel reading alignment.</p> <p>Currently the AEMO NSW & ACT Gas Procedures allow for daily, monthly, bi-monthly and quarterly scheduled reads as well allowing for transfers using estimated reads. AEMO is opening the electricity procedures to allow for transfers using substituted reads. This will provide the flexibility for read alignment between gas and electricity transfers in the ACT along with other jurisdictions.</p>
5.	1	Australian Energy Council	The AEC consider that limiting 1000 series CRs to FRMP transfers (as proposed in option 1) would be costly to retailers for no apparent benefit. We understand the only party practically able to object to a transfer are MC's, and currently the number of objections are inconsequential to the effective operation of the market. In discussions with our members, the AEC expects that the objective of next day transfers would be enabled utilising option 2, allowing retrospective MC changes to amend any errors, without requiring retailers to implement an additional step in their transfer systems for the very few current examples this rule causes transfer delays. If option 1 remains preferred, the AEC	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.



No.	Question	Consulted person	Issue	AEMO response
			expects the AEMO will undertake a comprehensive cost benefit analysis to ensure the final procedures best achieves the NEO.	
6.	1	Endeavour Energy	<p>Out of the two options presented we support option 1, which is to limit the 1000 series CRs to a change of FRMP only, as this will remove the potential for other parties to delay the retail transfer should they exercise their right to object. The FRMP can then change the MC with another CR if required. Although this introduces a two-step process we note that AEMO indicated that in 2018 MC changes with retail transfers was less than 0.1%.</p> <p>We do not support option 2, which is to remove the ability for a MC to object to being nominated for a NMI.</p> <p>We note that AEMO is seeking a process that can make the retail transfer occur within two days (or even sooner), MCs are seeking the right to object if they were nominated by a retailer they do not have a contract with or for a NMI that they wish not to provide services for, and retailers are seeking the right to nominate their preferred MC from the same date when they become responsible for a NMI to avoid contractual complexities.</p> <p>We wish to suggest other options for consideration:</p> <p>Option 3: This option would allow the New FRMP to continue nominating a MC and for the nominated MC to continue to have the right to object. A new obligation is then placed on the New FRMP to make the retail transfer complete within 2 days. This means that it would be in the interest of the New FRMP to make sure that they nominate the right MC. Should the MC nomination be correct but there is an issue on the MC side to cause the objection then it would be the FRMP's responsibility to contact the MC and resolve the matter. This new obligation should be monitored by AEMO for compliance.</p> <p>Option 4: This option builds on option 3. Due to the current design of MSATS and the CATS Procedure, option 3 makes the retail transfer at least a 2 day process – primarily driven by the objection logging period. This can be explained further by looking at the objection process. Currently when a party, like a MC, has the right to object they normally execute a set of validation rules. If the validation fails then they raise an objection, which signals to MSATS that the CR should not progress further. On the other hand if the validation passes, meaning that they approve the nomination, they signal this by not raising an objection. MSATS's current design is that the objection waiting period must expire without any objection before the CR can progress further. This means that MSATS is currently designed to look for the absence of an objection before the CR is allowed to progress further. This design has an inherent delay because it has to allow time for parties to exercise their right to raise the objection. To overcome this, we propose that there should be an 'approved' signal.</p>	<p>AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.</p> <p>Based on the submissions provided AEMO has aligned with Option 2 presented in the Issues Paper as well as retaining CR1010 for manually read meters. AEMO notes that Endeavour Energy's Option 4 creates a two step process that respondents wished to avoid and the priority of the CRC 1000 series is to enable the transfers in a way that avoids objections creating a delay.</p>



No.	Question	Consulted person	Issue	AEMO response
			Using the MC in our example again, if the MC's validation passes instead of staying silent they should send the 'approved' signal. MSATS should then check if all the parties who have a right to object have sent an 'approved' signal, if yes then the CR can progress further and therefore not have to wait for the objection logging period. We expect that parties will raise this 'approved' signal on the same day, or even within an hour, of receiving the PEND notification for the CR. Therefore the expected benefit is that the retail transfer could be completed within 1 day.	
7.	1	EnergyAustralia	<p>EnergyAustralia does not support the adoption of Option 1 and prefers Option 2 instead, under the heading "Nomination of multiple roles alongside a change of retailer".</p> <p>While nominations of MCs and possible objections by them can be valid (e.g. where the MC does not have a contract with the retailer), by AEMO's own record, the number of nominations of an MC in the Change Request (CR) 1000 series is low (less than 0.1%) and the number of objections would be lower. Therefore, changing the CR 1000 series to remove nominations of metering roles including MCs (and possible objections), to resolve what is a limited issue is likely to involve costs that outweigh the benefits. Should AEMO consider continuing with this option, we ask that it perform a cost-benefit analysis.</p> <p>Further, removal of MC nominations from the CR1000 would also create inefficiencies in market transactions, where the winning retailer would have to submit a request for change of FRMP and a separate request for change of MC. Although individually this would have a small effect, over time this would raise operational costs.</p>	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.
8.	1	Energy Queensland	Energy Queensland has not identified any impacts from this change and will be able to facilitate the change. Notwithstanding, we have provided specific comments in relation to the draft clauses in the MSATS CATS Procedures in the table in Section 3 below.	AEMO notes respondent's comment and refer to responses in Table 11.
9.	1	ERM Power	<p>AEMO proposes that notifications related to 1000 series CRs should be limited to the new retailer and parties provided with a right to object to a role change prior to the completion of the CR. It has also proposed to separate other role appointments from the transfer completion. This is to limit the potential for save behaviour and transfers being delayed due to role appointment objections.</p> <p>ERM Power is concerned that the proposed changes cast aside and ignore steps to resolve the root cause of transfer delays and inefficiently push these problems to be dealt with after the transfer. At this stage, rectification of issues becomes complicated, costly and leads to a situation where innocent parties are unjustly bearing transaction costs.</p> <p>AEMO has not sufficiently investigated the customer impact of a transfer with forthcoming issues with role appointment. Further, analysis has not been provided on the number or type of objections logged as the source of transfer delays, for example, those pertaining to faulty meters. Transferring</p>	AEMO considers that the ACCC considered matters regarding notifications to the losing retailer sufficiently, and concurs with their findings. The AEMC and COAG have also expressed their support for the removal of notifications and the associated prevention of 'save' activity.



No.	Question	Consulted person	Issue	AEMO response
			<p>customers with faulty meters is never an optimal outcome for the customer and places additional operational costs on affected retailers from rectifying the issue post-transfer. If the Procedure changes proceed, costs from reissuing final bills and collection compound. Alternatively, transferring customers with meters that have 'family failure' driven faults, not impacting data accuracy, may be acceptable.</p> <p>Rather than the approach proposed, we suggest improvements may be achieved by reviewing and narrowing the objection types available. Objections such as 'family failure' meter faults should be flagged separately and not used as the basis of an objection to complete a transfer. We suggest AEMO needs to undertake a lot more analysis of the incidence of delays from role appointments and the impacts (including costs) of this change before pursuing it.</p> <p>ERM Power fully supports the intent of eliminating save and win back activity and agrees that this activity has been damaging to the competitive market and has eroded customers confidence in retailers, particularly where customers are lured by offers only to find they are short lived. However, we note that previous MSATS Procedure changes that introduced a reduction of the Objection Logging Period to one business day would have served to curtail this behaviour as much as if the notification be removed altogether.</p> <p>We think the costs of implementing the removal of the notification of a pending customer switch are wasted costs. As described below, it is likely that any elimination in save behaviour will be nullified by win back behaviour. A better reform proposal would have been to ban both win back and save behaviour outright.</p> <p>We also see the likelihood of an increase in erroneous transfers. Despite our inability currently to object, our operations teams can usually identify when a pending or required transfer of our customers has been raised in error. This is particularly the case with our large or multi-site customers who are under contract for all sites. ERM Power believes this change will lead to a costlier rectification of transfer error and a higher incidence of it. This is not a good outcome for ERM Power or our customers who will need to spend more time rectifying transfer errors with other retailers.</p>	<p>Outside of the Victorian certified debt objection, AEMO notes that retailers do not have the capability to block or object to customer switches and whilst there might on occasion be switches performed in error, mechanisms are in place to correct such errors. Further, AEMO are seeking to establish methods by which reversals can be made simpler and less burdensome on retailers and customers. AEMO does not consider that the current retailer is best placed to monitor the appropriateness or otherwise of a customer's decision to switch away from them – this view was also reflected in the AEMC's draft determination on the related rule change process.</p>
10.	1	Evoenergy	<p>This will simplify the transfer process by limiting the change to FRMP only. However, even though Evoenergy support the change, extensive testing will be required across industry in a time of other big changes.</p>	<p>AEMO notes the respondent's support for the proposed change.</p> <p>AEMO acknowledges Evoenergy's comment regarding the volume of testing required during a time</p>



No.	Question	Consulted person	Issue	AEMO response
				of many changes in the industry.
11.	1	IntelliHUB Group	IntelliHUB does not believe so, what it does mean though is that a retailer must now raise a separate CR 6300 nominating the MC for 'small' NMIs.	AEMO notes respondent's comment AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.
12.	1	MEA Powershop	Please refer to our response for Question 2.	Refer to response in Table 1 item 30.
13.	1	Momentum Energy	<u>Scope of Customer Transfer Process</u> The separation of the customer switching process from the MC role appointment process is subject to an AEMC rule change which is now being considered. We disagree with AEMO on their preferred option here and instead support Option 2 which removes the ability of the current Metering coordinator to object to an appointment. This allows the prospective retailer to nominate their preferred MC at the time they submit a transfer into the market. This is a much more efficient process and is automated by many cases.	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.
14.	1	Origin Energy	Limiting the 1000 series CR's to change of FRMP only will remove the ability for MC's to object to a nomination where there is no agreement in place with the incoming FRMP. Origin believes the retention of the MC's ability to decline taking responsibility for a premise to which there is no contractual arrangement should be retained We do not support AEMO's preferred option – Option 1. This is given: <ul style="list-style-type: none"> • There needs to be contractual arrangements in place between MC's and incoming FRMP's to perform services. Absence of an agreement increases the risk of the MC being non-compliant and equally increases the risk of HSE related incidences; • There are liability and indemnity risks if the MC appointment is not corrected in a timely manner - specifically if there is a fault to the meter and there has been loss to the customer. Unclear who would be responsible for the loss as the MC has no relationship with the incoming customer/FRMP. There is no enforceable contract to assign liability. These risks could be avoided by ensuring the MC role is correctly assigned prior to the transfer. While Option 2 provides the ability for a retrospective correction of roles after the transfer has been completed, there are still risks (as outlined above) and complexities in terms of time, systems and process to seek the prospective retailer to amend MSATS to correctly reflected the metering	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.



No.	Question	Consulted person	Issue	AEMO response
			<p>responsibilities for the premises. The incentive to correct this after the transfer has occurred are significantly reduced.</p> <p>Origin proposes and supports an 'Option 3'. Option 3 would be allow an incoming FRMP to raise a CR1000 following a transfer request to change both the FRMP and, where necessary the MC; but not MD and MDP. This would enable the customer transfer to proceed while also reducing the operational risks of an incorrectly appointed MC.</p>	
15.	1	PLUS ES	<ul style="list-style-type: none"> For the scenarios where an incoming MC needs to be nominated and a meter churned, AEMO's proposed option to limit the CR1000 series to a FRMP only churn, allocates 2 business days of the metering installation timeframe to the nomination/completion of the incoming MC, which could have otherwise been utilised by deployment teams in planning and/or installing metering. For the efficiency identified above, PLUS ES supports retaining the capability for the FRMP to nominate the incoming MC in a CR1000 with objections. (Ability to object to a nomination of a role for valid and succinct reasons, should always be available for role nominations.) Additional considerations for AEMO: <p>PLUS ES notes whilst the volume is not significant, there are instances where the end use customer churns to a new retailer as an avoidance mechanism to having their current malfunctioning meter exchanged to a digital meter.</p> <p>An objection by an incumbent MC to the FRMP churn due to a faulty meter needing replacing could be an incentive to get the customer to agree to the meter exchange.</p> 	AEMO notes respondent's comment and refer to responses to Table 1 items 2 and 18.
16.	1	Public Interest Advocacy Centre	We do not consider it does.	AEMO notes respondent's comment.
17.	1	Red Energy / Lumo Energy	<p>Please see Red and Lumo's commentary above on Nomination of multiple roles alongside change of Financially Responsible Market Participant (FRMP).</p> <p>Nomination of multiple roles alongside change of Financially Responsible Market Participant (FRMP)</p> <p>Red and Lumo do not support AEMO amending the current procedures to remove the ability to nominate multiple participant roles in the market transfer nor the ability for Metering Coordinators (MCs) to object to the nomination and do not believe that the potential benefits outweigh the likely costs.</p> <p>The process to nominate multiple roles as part of the transfer process was implemented to meet retailer requirements under the contestability in metering reforms as well as the later obligations around the mandatory installation timeframes under 7.8.10(b) of the National Electricity Rules (NER)².</p>	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.



No.	Question	Consulted person	Issue	AEMO response
			<p>Red and Lumo, along with other energy retailers, have invested extensive costs to build automated systems nominating multiple roles in the transfer request as well as automated processes where there is an existing MCs in the role. The choice to undo this extensive work and reconfigure transfer systems to meet new requirements would be extremely expensive (Red and Lumo can provide a confidential estimate of costs upon request from AEMO for the build of the new system proposed separate to this submission).</p> <p>Furthermore, neither of the proposals put forward by AEMO would be simple to implement and would require extensive rework of existing systems. This goes against the original ethos of AEMOs rule change where it noted that “at a practical and technical level, the proposal utilises existing systems and interfaces and leverages current capabilities and processes. This allows the scale of change, in particular to industry participants’ systems, to be minimised.”³ This would not leverage existing systems and requires a complete rebuild of a recently built process taking extensive time, high implementation and sunk costs.</p> <p>Red and Lumo also do not believe that the problem AEMO is seeking to address is widespread enough or causing a long enough delay for consumers to warrant this extensive cost for retailers to redevelop existing systems. While we understand that there are some instances where MC’s may object to being appointed to a role these instances are comparatively small (usually involving a retailer MC). We believe that due to the limited benefit and high cost AEMO should not change the current procedures. We further believe that with the proposed amendments to the CR 1026 transfer allowing retailers the confidence to begin transfers upon agreement with consumers during the cooling off period many of these transactions will begin even earlier and be addressed within the cooling off period which will further reduce any consumer impact.</p> <p>² National Electricity Rules, Version 127, Rule 7.8.10B</p> <p>³ AEMO, Electricity Rule Change Proposal: Customer Transfers in the NEM, May 2019, p18</p>	
18.	1	Simply Energy	<p>Not aligned, Option 1 strongly opposed.</p> <p>Combined response for questions 1 and 2:</p> <p>Simply Energy has reviewed both options and concluded that restricting CR 1000 series to only allow FRMP role nominations adds to the complexity of the current operational model, adds to the cost of implementation and maintenance, and delivers negative benefits for no change in customer outcomes. In summary:</p>	<p>AEMO notes respondent’s comment and refer to response in Table 1 item 2 and provide additional detail as follows.</p> <p>AEMO acknowledge the comments provided on the options presented in the Issues Paper. AEMO considers the</p>





No.	Question	Consulted person	Issue						AEMO response
			Option	Description	NER change	AEMO procedures	Retail Impact	Customer outcome	recommendation for Option 2 is a reasonable approach as it limits the impact of the change and does not override the obligation for the retailer to appoint the MC in the NER. Option 2 provides the retailer with both an obligation and incentive to correctly nominate the MC in the CRC as well as quickly correct any MC nomination errors.
			#1	Limit the scope of customer switching so that only the retailer role is changed in the transfer process.	Yes [requires 7.8.9(e)(1) to be deleted]	Yes	System and process changes for transfers System and process changes for MC role appointment	Identical in both cases	
			#2	Remove the ability for MCs to object during transfer.	No change	Yes	No change		
			As a result, Simply Energy strongly recommends Option 2 for the following reasons:						
			<ul style="list-style-type: none">• It minimises the impact of change;• Better alignment with the objective of faster transfer;• It supports efficiency in market processes, and• Close alignment with the National Energy Retail Objective, NERO (to promote efficient investment in, and efficient operation and use of, energy services for the long-term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy).						AEMO notes that both Option 1 and 2 are open to incorrect nominations of MCs, however, Option 2 allows retailers to complete the transfer CRC as well as the MC nomination as one task.
			Retaining the functionality to nominate MC roles along with FRMP is required as it will allow the proposal to work effectively and efficiently.						AEMO notes that Option 3 does not deliver the ACCC recommendation to eliminate 'save' activities.
			Detailed analysis:						
			As per NER cl 7.2.1, the retailer’s obligation is to nominate an MC (not an MDP (Metering Data Provider) or MP (Metering Provider). As such, in the context of role appointments, these three metering roles should not be referred together as in the AEMO proposal that says, “metering roles may be proposed to change via a separate change request in the procedures and following completion of the customer transfer”.						
			AEMO’s high level design states that “parallel role changes that can only be achieved in theory and not in practice.” Simply Energy acknowledges that MDP and MP roles are not changed in parallel with retail transfers, and as such, can be decoupled from CR 1000 series, however the option to appoint to the MC role in conjunction with FRMP role change should remain.						
			Simply Energy considers that the FRMP and MC roles are in one category (market responsibility roles nominated by the winning retailer) and can transfer at the same time, whereas the MDP and MP are in a different category (service providers nominated by the MC) and should not transfer at the same time as the FRMP.						
			Aligning with a consumer-centric approach:						



No.	Question	Consulted person	Issue	AEMO response
			<p>Simply Energy considers that Option 1 (two-step process) will not benefit 99.9% (as per the statistics provided by AEMO in the high-level design), of the retail transfers and as such, it will not drive any customer benefit. It rather adds to the economic cost by making changes that will not only generate a negative return on investment but will also make the remaining 0.1% of the cases more difficult to resolve due to the complexity with Retailer-MC relationships.</p> <p>From a consumer detriment perspective, since with the two-step process that might be implemented, the appointed MC might need to be churned in order to address customer's metering issue/complaint/fault and hence delays the whole process in the value-chain.</p> <p>To expand it further, if a customer informs the retailer of any metering fault/issue or wishes to upgrade their meter as a part of solar upgrade, unless the retailer appoints its preferred MC, it will be unable to address customer's request promptly. E.g. a customer is currently with Retailer "SE" and MC "A" however in order to rectify or assist with the customer's issues, the retailer has to churn the MC to its preferred MC who can undertake the work. This will prolong the end-to-end rectification process (as also described in figure 2 with the red dotted timelines) and impacts the customer negatively.</p> <p>Some of the key impacts of Option 1 are:</p> <ul style="list-style-type: none"> • Going backwards (where no multi-tasking will be allowed) • Not supporting support efficient market processes. • Decommissioning of current systems/logic and replace with a traditional logic + manual processes + forced MC appointments. <p>Simply Energy identified (using its data as well as discussions with its MCs) that no competitive MC intends to object to a transfer because it's an opportunity for them. However, no non-competitive MC would want them to be appointed as MC because of various complications.</p> <p>Alternative approach:</p> <p>As evident from the statistics, Option 1 is targeted for an exceptionally small number of cases, which makes it an unjustifiable option. If MCs objecting to the retail transfer is a valid concern, as per the numbers provided in the draft determination, it only accounts for 0.1% of the cases (2018 statistics) and to add further, there are no statistics provided for 2019. Most importantly, the number of objected transfers by MCs are extremely rare (if at all). In case of Simply Energy, this only occurred a handful of times in 2018 and since we changed our processes for Feb 2019 NER changes, this has not occurred even once.</p> <p>To avoid the unnecessary changes, Simply Energy agrees with Option 2 proposed by AEMO in its High-Level Design document (section 4.2.2) to remove the ability for service providers to object as MSATS procedures allow retrospective correction of role changes, However, Simply Energy has also</p>	



No.	Question	Consulted person	Issue	AEMO response
			<p>considered a third option where FRMP and MC roles can be nominated as per current process, however MSATS updates the role appointments independently (currently CRC updates 'all or none' but can MSATS manage partial updates? e.g. CR initiated with multiple role changes/nominations, however MSATS allows individual updates (splitting one CR into multiple internal CRs) where FRMP change can complete but RP change to be blocked). By adding a new validation, MSATS could be designed to update the FRMP role independently and thus completes the retail transfer while the MC can still object its role assignment. This will be a hybrid approach to options 1 and 2 and this option will limit the scope of change to an already-impacted MSATS system and works in line with the objective of the proposed change. It might require CR1000 being split into multiple CRC codes within MSATS (if it has multiple role nominations) with no impact to the initiator.</p> <p>Simply Energy believes that architecturally, it is possible however in principle, it poses the same question as for option 1, i.e. is it worth the complexity of system change and does it add value to the cost of implementation vs consumer benefit. Simply Energy acknowledges the complexity of this design and would like to reiterate that the high-cost solutions to resolve a handful of cases is not desirable. As such, Simply Energy retains its position to support Option 2.</p> <p>Please find attached slide packs for pictorial representations along with timelines, risks and benefits of the options, which have been shared with AEMO.</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  Procedure amendments_AEMOEnergy_7.8.9e1 Rem </div> <div style="text-align: center;">  Simply </div> </div> <div style="border: 1px solid orange; padding: 10px; margin-top: 10px;"> <p>Dr Deming, the father of statistical process control that helped Japan improve product reliability post second world war, mentioned in his research paper <i>"if anyone adjusts a stable process for a result that is undesirable, or for a result that is extra good, the output that follows will be worse than if he had left the process alone."</i> The worsening output then leads to further remedial changes, leading progressively to a complete overhaul of a process that had been operating successfully before.</p> </div>	
19.	1	Tango Energy	Tango Energy acknowledges the restriction of the CR 1000 series to change only the FRMP and changes to MC, MDP and MPB can be effected by use of the CR6000 series. However, as a result of	AEMO notes respondent's comment and refer to



No.	Question	Consulted person	Issue	AEMO response
			this, retailers will be required to manage two CRs in the event a New MC is nominated. This has process, system and cost implications. It needs to be demonstrated these changes and associated costs are warranted.	responses in Table 1 items 2 and 18.
20.	1	TasNetworks	TasNetworks does not consider this change restricts any parties from performing any actions as required by the NER.	AEMO notes the respondent's support for the proposed change.
21.	1	Vector Metering	Yes. Vector Metering believes there has been no case presented to remove the ability for the MC to nominated in the CR100x series. Current functionality allows the retailer to nominate the MC role in a single transaction. The proposed change would require the retailer to wait until the customer transfer has completed and then nominate the MC role with a subsequent transaction incurring a further objection period. This is inefficient.	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.
Are the issues raised by AEMO regarding restrictions being placed on an MCs ability to object to an appointment reasonable?				
22.	2	Ausgrid	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.	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18. AEMO will be including the nomination of the MC in the CRC1000. AEMO notes that if compliance issues exist, we request that Ausgrid provide more detail for AEMO to consider.
23.	2	AusNet Services	If the 1000 series Change Request transactions no longer incorporates a MC change, then there would be no reason for an MC to object to retailer transfer.	AEMO notes respondent's comment.
24.	2	Australian Energy Council	The AEC agrees that MC objections should not delay transfers, and considers that option 2 will achieve that outcome.	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.
25.	2	Endeavour Energy	We agree that a MC should be allowed to object to being nominated for a NMI. This could be for reasons such as the MC does not have a contract with the retailer or the MC should not be the MC due to the metering installation type.	AEMO notes respondent's comment and refer to



No.	Question	Consulted person	Issue	AEMO response
			<p>AEMO's proposal to adopt option 1, which is to limit the 1000 series CRs to a change of FRMP only, would remove any retail transfer delay that could be caused by a MC exercising their right to object. Therefore if option 1 is adopted then there would not be any reason for restricting an MC to raise an objection.</p> <p>We believe the alternative, which is to remove objection rights from the MC and instead make retrospective corrections, would be more complex and time consuming, especially given that the MC that is impacted does not have the ability to fix the issue themselves and must rely on other parties instead.</p> <p>Note that we have suggested alternative options under question 1 that looks to address each key party's desires.</p>	<p>responses in Table 1 items 2 and 18.</p> <p>AEMO notes that for the CRC 1000 series a MC cannot be nominated unless the MC role is being changed by the transaction. If a contestable MC is already in the role, the CRC 6000 series needs to be used to change to an initial MC if it is required for the transfer as the metering has not been upgraded. The CRC 1000 series will have MC as optional, to allow the initial MC to stay in place when the transfer is not requiring an MC change.</p>
26.	2	EnergyAustralia	<p>While MC objection is commercially valid in some instances, on balance, we agree that MC objections should not delay transfers.</p> <p>We support Option 2 that removes MC objections from the CR (for change of FRMP), provided that MCs can still object under the procedures using another CR.</p>	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.
27.	2	Energy Queensland	We consider this is a reasonable approach. However, we note that removing the appointment of MC from the CR1000 avoids the issue.	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.
28.	2	Evoenergy	No comment	AEMO notes respondent's comment.
29.	2	IntelliHUB Group	Contestable MC's need to be able to object to erroneous MC nominations. For initial MC nominations I am not sure any changes are required here. I think initial MC's are declining correctly in most circumstances. It is some FRMP's that are nominating the initial MC in error when there is already a contestable MCs metering at site.	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.



No.	Question	Consulted person	Issue	AEMO response
30.	2	MEA Powershop	<p>Powershop believes that neither option proposed would cause any regulatory issues. The options are reasonable in application and would achieve AEMO's objective of ensuring a more efficient customer transfer process.</p> <p>However, Powershop believes that Option 2, the removal of a Metering Coordinator's (MC) ability to object to an appointment, is the preferred option. This is because Option 1 would require significant system changes for industry, with one of the most commonly used change request transactions requiring considerable modification causing significant development cost.</p>	AEMO notes respondent's comment and refer to responses in Table 1 items 2 and 18.
31.	2	Origin Energy	<p>With regards to AEMO's concerns around objections and potential delays, it would only be for premises where there are smart meters as the DNSP is the initial MC for accumulation meters. Given the objection is only relevant to smart metered customers, the prospective FRMP has the ability to resolve the issue as soon as practicable and the customer can transfer the next day.</p> <p>Further, the incidences of the MC objections are minimal (0.1%) and it is more efficient and cost effective for the industry if these issues were resolved prior to a transfer.</p>	AEMO notes respondent's comment.
32.	2	PLUS ES	<p>PLUS ES supports that the MC should have the ability to object to a prospective/retrospective appointment.</p> <p>In most scenarios, the MC objection would be due to a valid commercial/contractual agreement. i.e. a Direct Metering Agreement with the customer, where the incoming retailer may have no knowledge of nor should they.</p> <p>Whilst there are transactions to enable a retrospective correction, the MC is dependent on the FRMP to receive and action the request. Hence, the most efficient mechanism is to be able to object to the nomination itself.</p>	AEMO notes respondent's comment. AEMO is not proposing to change the MC objections in CRC 6000 series. AEMO is only proposing that MC objections be removed where it is with a transfer of FRMP in order to not delay the FRMP transfer, the primary purpose of the CRC 1000 series. Error corrections will still be available within the CRC 1000 series. Refer to response in Table 1 item 18.
33.	2	Public Interest Advocacy Centre	We agree erroneous appointments of MCs shouldn't impact the switching process and consider, given the small proportion of MC changes proposed, and if there is opportunity to object on reasonable grounds post-switch, negative impacts on MCs will be small.	AEMO notes the respondent's support for the proposed change.
34.	2	Red Energy / Lumo Energy	Please refer to response for Question 1.	Refer to response in Table 1 item 17.



No.	Question	Consulted person	Issue	AEMO response
35.	2	Simply Energy	Please refer to response for Question 1.	Refer to response in Table 1 item 18.
36.	2	Tango Energy	Where a MC is nominated by the FRMP in the 6300/1 it is expected the objections of CONTRACT, RETRO and DECLINED will still apply.	AEMO has not proposed any changes to the CR6300/6301 transactions.
37.	2	TasNetworks	TasNetworks considers the issues raised are reasonable. With either option the new FRMP and existing MC would need to ensure they have an agreement in place between both parties to continue providing services.	AEMO notes the respondent's support for the proposed change.
38.	2	Vector Metering	No. MC's should not delay the customer transfer between retailers. Correction of role nomination can be performed after transfer should that be needed.	AEMO notes the respondent's support for the proposed change and refers to response in Table 1 item 18.
Does the removal of the notification of a pending customer switch unreasonably restrict retailers from being able to comply with the NER or NERR?				
39.	3	AGL Energy	<p>On the proposed limitation on notification of a pending role change, as we outlined in our submission to the AEMC,¹ we consider this change will have a range of implications for retailers' ability to comply with their obligations under the National Electricity Rules (NER) and National Energy Retail Rules (NERR), that should be appropriately considered to mitigate customer detriment.</p> <p>We note AEMO's proposal that prior to CR completion, notifications related to 1000 series should be limited to:</p> <ul style="list-style-type: none"> • The party raising the CR (e.g. the new retailer); and • Parties which are provided with a right within the market framework to object to a role change prior to its completion. <p>While we understand this proposal meets one of the ACCC recommendations, being to eliminate retailer intervention activity, we consider the proposal will have a range of material implications for retailers being able to comply with their obligations under the NER and NERR where they lose a customer in the transfer process, including with respect to:</p> <ul style="list-style-type: none"> • Service orders, such as: <ul style="list-style-type: none"> • Disconnections and reconnection notices; • meter test; • crossed metering investigation; • tariff reconfiguration; and 	<p>AEMO notes that current processes in regard to service orders are not directly linked to the CRCs and the scenarios noted can occur under the current MSATS procedures. AEMO considers that there are mechanisms that can be employed by retailers and their service providers to minimise risk of confusion to customers, or of any service works being undertaken inappropriately, without the need for a notification of a pending customer switch.</p> <p>AEMO considers that the removal of the notification will prevent 'save' activity and be</p>



No.	Question	Consulted person	Issue	AEMO response
			<ul style="list-style-type: none"> • check reading (especially for chronic no access site) • Outage notices; and • Customer arranged appointments for works, including: <ul style="list-style-type: none"> • solar and battery installations; and • smart meter upgrades. <p>In a number of these circumstances, we anticipate that retailers may be at risk of contravening their regulatory obligations for reasons that may be outside of their control and with no ability to rectify.</p> <p>¹ See AGL submission in response to Australian Energy Market Commission reducing customers' switching times (retail), Rules consultation paper (6 August 2019), available at https://thehub.agl.com.au/articles/2019/08/agl-submission-to-aemc-customer-transfers.</p>	<p>beneficial to retail competition and customers, consistent with the ACCC REPI recommendations.</p> <p>Accordingly, AEMO has determined to remove notification to parties as originally proposed.</p> <p>AEMO refers to the submission and assessment discussion in Section 4.2 of the Draft Report.</p>
40.	3	Ausgrid	No Comment.	AEMO notes respondent's comment.
41.	3	AusNet Services	Removing the pending role would appear to not impact the ability of participants to comply with electricity law, however, we question whether it would impact participant systems with automation that expects the transaction and whether removing the pending status is beneficial to customers. We suggest, there would be no benefit of removing the status for existing registered participants.	Refer to response in Table 1 item 39.
42.	3	ACT Civil and Administrative Tribunal	The ACAT supports the stated Design objective and Design principles, noting that a two day transfer period will reduce the opportunity for 'save' marketing by the losing retailer.	AEMO notes the respondent's support for the proposed change.
43.	3	Australian Energy Council	No position.	AEMO notes respondent's comment.
44.	3	Endeavour Energy	No comment	AEMO notes respondent's comment.
45.	3	EnergyAustralia	<p>While EnergyAustralia has not identified any compliance issues, we do note that there might be impacts to inflight service orders depending on each retailer's practices.</p> <p>For instance, a retailer may raise a disconnection service order when informed of a pending customer transfer and choose to cancel the order during its disconnection process. In the absence of CR1000 notification of a customer transfer, the losing retailer would not be able to cancel the disconnection. While we don't see this as creating a compliance issue per se, it may create poor customer experience, and confusion as to who the customer considers responsible for a disconnection and</p>	Refer to response in Table 1 item 39.



No.	Question	Consulted person	Issue	AEMO response
			which retailer they should contact to re-energise. In the customer's view, their retailer is the winning retailer even though the transfer may not have occurred yet.	
46.	3	Energy Consumers Australia	<p>We consider one of the key changes proposed by AEMO is the removal of the notification of a pending role change, which would remove the advance notification to the losing retailer of a customer switch. This notification is often used by the losing retailer as a trigger to undertake "save" activity to retain the customer.</p> <p>We consider this save activity has a number of negative outcomes for consumers. Firstly, we believe that retailers should make their best offers available to all consumers, not just those who indicate they intend to switch to another retailer. Further, retailers should be actively looking for ways to ensure their customers are on the best offer for their needs, rewarding consumer loyalty rather than penalising consumers for it. Finally, as the ACCC noted, the "competitive dynamics in the NEM's retail markets has given rise to strategic retention activity that increases costs and provides little benefit to consumers."⁴ These costs are ultimately passed on to all consumers, increasing prices.</p> <p>We agree with the ACCC that removing the advance notification will encourage retailers to proactively engage with and seek to retain their existing customers. Retailers who support their customers in this way will provide the industry leadership necessary to rebuild consumer confidence and trust in the market.</p> <p>⁴ ACCC, Submission to the AEMC Draft rule Determination on reducing customers' switching times, p.1.</p>	AEMO notes the respondent's support for the proposed change.
47.	3	Energy Queensland	As long as the losing FRMP receives the COM notification and there are strong obligations and monitoring on the MDP to publish Meter Reads on the Churn Date, then this restriction is reasonable.	AEMO notes the respondent's support for the proposed change and notes the comments about the availability of meter reads.
48.	3	Evoenergy	No, this will simplify the transfer process.	AEMO notes the respondent's support for the proposed change.
49.	3	IntelliHUB Group	No comment.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
50.	3	MEA Powershop	<p>Powershop supports this change and its intent and does not believe that the proposed changes to the notification process restrict retailers from complying with the National Electricity Rules or the National Energy Retail Rules.</p> <p>However, Powershop would like to emphasise that this is a highly significant system change for retailers as it is a complete redesign of the entire switching process. Subsequently, the implementation period following AEMO's final design must reflect this significance, or risk the market becoming paralysed through customers not being able to switch retailers. The May 2020 go live date is not practical and should be deferred at a minimum to 1 October 2020.</p>	AEMO notes the respondent's support for the proposed change and notes the comments about the system change timeline.
51.	3	Momentum Energy	<p><u>Notifications of Pending Role Change</u></p> <p>We agree that sending notifications to the losing retailer at all stages of the customer transfer has contributed to the development of "saves" programs. However we believe that retaining a late notification may avoid some unintended consequences of this change. In some cases of churn, shortly before a request for disconnection for debt a site, may be de-energised inappropriately due the lack of a notification to the losing retailer. Moreover the removal of all notifications could result in wrongful disconnections particularly with move in scenarios. We urge AEMO to investigate all scenarios before all notifications to the losing retailer are removed.</p>	Refer to response in Table 1 item 39.
52.	3	Origin Energy	<p>Removing notification of a pending transfer, removes the ability of current retailers to manage those customers that are most at risk of falling into debt or customers who are uncertain who they have signed with.</p> <p>If a customer is a hardship customer, once they transfer, they are no longer eligible for the hardship support on their previous plan. The notification of intention to transfer will allow the retailer to contact that customer to discuss their options if they wish to leave the retailer. This gives the hardship/vulnerable customer an opportunity to assess debt repayment options and minimise the possibility of entering into a new contract that does not recognise a customer's hardship status.</p>	AEMO notes respondent's comment. Customer management is a retailer process for contracts, debt and hardship, and is not a function of the MSATS Procedures.
53.	3	PLUS ES	<p>PLUS ES recommends that notifications to the FRMP could deliver efficiencies such as allowing them the option to withdraw open B2B SOs.</p> <p>PLUS ES strongly supports the retention of the CR10xx series notifications to the current MC/MPB/MDP.</p> <p>Retaining the notifications to the MSPs does not impact AEMOs objective of reducing the customer switching timeframes. It will, however, incur an unnecessary cost to the participants to amend critical metering system processes which are triggered by the MC/MPB/MDP notifications.</p> <p>These notifications operationally support the MC/MPB/MDP participants to:</p>	AEMO notes that retaining the current CRC 1000 series notifications to the FRMP and metering parties does not deliver the ACCC recommendation to eliminate 'save' activities. Retailer management of service orders



No.	Question	Consulted person	Issue	AEMO response
			<ul style="list-style-type: none"> Withdraw a SO which has been raised by the losing FRMP in a timely manner Mitigate invoicing disputes with respect to metering service works and which FRMP should be charged for the metering works- the losing FRMP or the new FRMP who has not raised a B2B SO. 	is a process outside of the MSATS Procedures.
54.	3	Public Interest Advocacy Centre	Broadly, we consider it does not but we recommend considering how the lack of notification impacts losing retailers' treatment of lost customers' debts.	AEMO notes respondent's comment. Customer debt management is a retailer process and is not a function of the MSATS Procedures.
55.	3	Red Energy / Lumo Energy	Yes, Red and Lumo believe that the removal of the notification to the market risks retailers wider obligations in relation to both pending service order request to the market and obligations around pending meter exchanges for consumers. We have expanded further on this below (refer to Table 1 item 88 for Question 5).	AEMO notes respondent's comment. AEMO notes that current processes in regard to service orders are not directly linked to the CRCs and the risks exist under the current MSATS procedures. Refer to response in Table 1 item 88.
56.	3	Simply Energy	<p>Aligned, however VIC should be aligned (Option 3) – Option 1 and 2 are essentially the same as zero business day objection wouldn't make any difference.</p> <p>While Simply Energy supports the view that the objection to certified debt should be taken off Victorian codes, in absence of that option Simply Energy agrees with AEMOs preferred option (Option 3), to 'remove the current objection period and replace with a process to re-instate the previous retailer following the completion of a transfer in MSATS upon identification of a certified debt'. Key reasons are as follows:</p> <ul style="list-style-type: none"> aligns NEM wide processes without the need to maintain two separate logics (one for VIC with PEN transaction and other one for NECF states without PEN transaction) facilitates next day transfer in line with other NECF states, as proposed, and provides flexibility to retailers as it allows reversal of transfer should a retailer wish to prevent transfers away on the grounds of 'certified debt'. 	AEMO notes the respondent's support for the proposed change.
57.	3	Tango Energy	It is understood the notification of Pending occurs in the MSATS overnight batch process and the notification of Completed can occur within seconds of the Pending update. It is unlikely participants have processes linked to the receipt of the Pending status.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
58.	3	TasNetworks	TasNetworks does not consider that the removal of this notification would restrict retailers complying with the NER and NERR.	AEMO notes the respondent's support for the proposed change.
59.	3	Vector Metering	<p>Vector Metering notes that the draft procedures remove the notification of a pending customer transfer to <u>all</u> roles, not just the current FRMP. Vector does not see the logic in removing these to service providers who have no role in the customer / retailer relationship. Currently Service providers rely on retailers cancelling SO should they churn away from a customer. Should the proposal that the current FRMP not be alerted until after a churn away occurs prevail, then it is even more important that these notifications are sent to the service provider so that the any requested work can be suspended in a timely fashion. Allowing service providers to see a pending customer transfer, that can't be objected to, will allow scheduled work to be cancelled.</p> <p>Vector Metering notes that recommendation 8 from the ACCC only relates to the losing retailer receiving notification after the customer switch is completed. There is no mention of other parties and Vector cannot see a compelling reason why the current notification rules should be changed to exclude MDP/MP/MC or DNSP.</p>	AEMO notes respondent's comment and refer to response in Table 1 item 53.
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?				
60.	4	AGL Energy	<p>AGL's preferred approach is that Victoria harmonises its' jurisdictional requirements relating to certified debt objections with the National Energy Customer Framework.</p> <p>However, we understand this is not in the remit of AEMO and therefore support AEMO's preferred Option 3 to establish a new CRC which allows for a customer switch to be reversed (in Victoria only), where a retailer identifies certified debt and considers that the one business day timeframe for the retailer to identify a certified debt, consistent with the established timeframes under the current processes, is appropriate.</p>	AEMO notes the respondent's support for the proposed change.
61.	4	Ausgrid	No Comment.	AEMO notes respondent's comment.
62.	4	AusNet Services	AusNet Services is concerned that the option proposed in the issues paper was chosen without considering how the alternative option 2 could also prevent "retailer save activity". With option 2, retailers could batch their 1000 series CR transactions to after 7pm so the current retailer (if they responded instantly) would not be legally permitted to call the customer to offer a counter offer. In the rare case of a customer satisfying the Vic criteria for a DEBT objection, the current retailer could	AEMO notes that this suggested change will not solve the issue raised. Regarding the cost to distributors of implementing the new CRC, we consider that



No.	Question	Consulted person	Issue	AEMO response
			<p>still automatically object to the transfer. On this basis, option 2 satisfies the Electricity Customer Transfer Code while option 3 doesn't.</p> <p>We make this point because option 3 involves much more significant and costly IT system changes in establishing a new Change Reason Code (CRC) that for the above reasons is unnecessary.</p>	this is a limited change as the new CR could be interpreted as a CR1000 if a participant chooses.
63.	4	Australian Energy Council	No position.	AEMO notes respondent's comment.
64.	4	Endeavour Energy	No comment	AEMO notes respondent's comment.
65.	4	EnergyAustralia	None. We agree with AEMO's preferred Option under heading "Objection to customer switches in Victoria on the basis of a certified debt".	AEMO notes the respondent's support for the proposed change.
66.	4	Energy Queensland	Energy Queensland offers no comment – not applicable in Queensland.	AEMO notes respondent's comment.
67.	4	Evoenergy	No comment	AEMO notes respondent's comment.
68.	4	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
69.	4	MEA Powershop	Please refer to our response for Question 5.	Refer to response to Table 1 item 85.
70.	4	Momentum Energy	<p><u>Objection Period for Victorian Certified Debt</u></p> <p>Momentum agrees that the objectives of the ACCC REPI would not be met if all transfers in the NEM were delayed to allow the application of the Victorian certified debt objection right.</p> <p>We support Option 3 to remove the current objection period and replace it with a process to re-instate the previous retailer, following the completion of a transfer, in MSATS upon identification of a certified debt. This will also future proof the MSATS system should Victoria change their views on the value of this regulatory provision.</p>	AEMO notes the respondent's support for the proposed change.
71.	4	Origin Energy	No comment	AEMO notes respondent's comment.
72.	4	Red Energy / Lumo Energy	Please see Red and Lumo's commentary on the governance arrangements above. Governance	The NER requires AEMO to develop and publish



No.	Question	Consulted person	Issue	AEMO response
			<p>The National Electricity Rules (NER) provides the head of power for AEMO to make and amend the Market Settlement and Transfer Solution (MSATS) Procedures. These are designed to support the functions and obligations placed on participants and AEMO in Chapter 7 of the NER. These include assignment of roles which establish which participants are financially responsible for a connection point and/or its metering installation.</p> <p>The National Energy Retail Rules (NERR) establish the retail market procedures to support the function of the retail market. The retail market procedures under the NERR include the MSATS Procedures, which for this purpose are designed to facilitate customer transfers and other customer related activities.</p> <p>As there is no rule that prohibits retailers from being notified that they will lose a customer in a specified time period, nor is there a rule that prohibits retailers conducting save activity, it is unclear where the head of power exists for AEMO to prevent this activity. AEMO provided the AEMC a rule change and did not request the establishment of a head of power to allow for this activity to occur. We consider that the procedures established by AEMO must reflect the requirements of the NER and NERR that they are established under.</p> <p>The Victorian Government has indicated that it, as the policy maker, wishes to prohibit retailers from conducting save activity. In order to implement this, it is creating a regulatory obligation that will mandate particular retailer behaviour. As AEMO is a market operator, we question whether AEMO has an ability to make a policy change of this nature.</p>	<p>procedures which govern the transfer of financial responsibility for energy flows at a connection point, under clause 7.16.2 (the MSATS Procedures). The CATS Procedure deals with the transfer of customers between retailers. As a result, the changes to the design of the customer transfer process from a technical and operational perspective are within AEMO's remit to amend, in accordance with the NER consultation requirements.</p> <p>Within this context, AEMO's view is that neither advance notification to the losing retailer of a customer changing retailer, nor save activity by the losing retailer, are features of a well-functioning market. This view is consistent with the ACCC's recommendations in the Retail Electricity Pricing Inquiry (REPI) – Final Report, June 2018.</p>
73.	4	Simply Energy	<p>Simply Energy considers Option 3 as the most practical option however there is a key issue that needs to be considered.</p> <p>Simply Energy has identified a scenario where the removal of PEN could cause issues with the de-energisation process. For example, if a Retailer has raised a disconnection for non-payment and the customer has transferred away from that retailer to the new retailer, due to the absence of PEN transaction, the previous retailer (who raised DNP) would have no opportunity to withdraw the DNP.</p>	<p>AEMO notes the respondent's support for the proposed change and refer to response in Table 1 item 39.</p>



No.	Question	Consulted person	Issue	AEMO response
			While distributors can monitor transfers and cancel pending DNP's where required, if a transfer completes concurrently with the DNP the distributor might be unable to cancel it. This may lead to a wrongful disconnection, with risks for retailers depending on when the DNP was actioned. Simply Energy suggests that AEMO procedures provide clarity to deal with this scenario, including suggestions via B2B procedural amendments if required.	
74.	4	Tango Energy	Tango Energy acknowledges the introduction of the CR code to allow for the reversal of a transfer back to the Previous FRMP in Victoria based on certified debt. There are system, process and cost implications with this change with respect to raising the 'objection' and receiving the notification of the objection.	AEMO notes respondent's comment. The proposed changes do not mandate that a retailer has to build to use the proposed new CRC and AEMO considers that there is limited change for retailers who choose not to build for the proposed new CRC.
75.	4	TasNetworks	TasNetworks' preference would be to implement a solution that did not require a schema change, being either option 1 or option 3 but re-designing one of the existing error correction CRs, rather than creating a new one.	AEMO notes respondent's comment. Creating the new CRC does not drive the need for a schema change.
76.	4	Vector Metering	<p>Given that Victoria has deployed remotely read meters to most customers, and the changes proposed in this consultation provide only provided benefit to those customers who have manually read meters it appears that leaving the current processes as they currently are does not impose any material disadvantage to the Victorian customers.</p> <p>Vector Metering notes that Certified Debt objections is still valid under the jurisdictional rules. Vector Metering recommends that the existing process of notifications to current retailers be maintained for Victorian transfers so that the FRMP can object for reasons of DEBT as they are permitted to do in this jurisdiction. Requiring Victorian retailers to build a brand-new transaction to achieve an outcome that is already supported in the market today has only cost and no benefit.</p>	<p>AEMO notes respondent's comment.</p> <p>AEMO established the case for change in the issues paper.</p>
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?				
77.	5	Ausgrid	No Comment.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
78.	5	AusNet Services	We are not able to comment on retailer's ability to process objections in 1 business day if done manually, but retailers may be able to automatically object to transactions based on artificial intelligence on the same day a transaction is raised. In our experience, same day automatic objections are effective.	AEMO notes respondent's comment.
79.	5	Australian Energy Council	<p>The AEC agrees with the AEMO that option 3 best achieves the outcomes sought, and places any costs to implement on retailers wishing to exercise their rights to objection in Victoria. That being said, we consider there may be impacts to customer experience that should be better understood prior to the finalisation of the new procedures.</p> <p>The proposal to complete the transfer, and then to enable it to be reversed without notification to the customer is likely to result in customer confusion, particularly in instances where the winning retailer complies with its obligations in rule 58 of the NERR electronically.</p>	AEMO note that it is common for retailers to send information/welcome packs either subsequent to agreeing to become a new retailer or upon completion of the MSATS process and that these may be received after the customer has been notified via other mechanisms that the switch has been reversed. The customer will be contacted by either, or both the current and prospective retailer regarding the cancellation of the transfer, as occurs today. The proposed change affects only the MSATS role nomination process to which the customer is not a party.
80.	5	Endeavour Energy	No comment	AEMO notes respondent's comment.
81.	5	EnergyAustralia	No. EnergyAustralia considers the one business day timeframe to object for certified debt is not adequate for affected retailers.	Retailers currently have one business day, AEMO has retained that timeframe in the proposal. AEMO notes that alternative error correction CRCs can be used after the



No.	Question	Consulted person	Issue	AEMO response
				one business day, with the agreement of the new retailer.
82.	5	Energy Queensland	Energy Queensland offers no comment – not applicable in Queensland.	AEMO notes respondent's comment.
83.	5	Evoenergy	Yes, this will still enable retailers to exercise their rights to prevent a transfer.	AEMO notes the respondent's support for the proposed change.
84.	5	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
85.	5	MEA Powershop	Powershop does not object to transfers based on certified debt in Victoria. As noted in the Paper, this scenario is associated with only 0.3% of transfers in the market, therefore most market participants do not use this objection. Powershop encourages AEMO to ensure that the final decision and high-level design does not apply any unnecessary system development to cater for such a small number of transfers.	AEMO notes respondent's comment and refer to response in Table 1 item 74.
86.	5	Momentum Energy	However we are concerned that the proposed one business day time allowed to raise a "Debt CRC" is insufficient as it would not allow the losing retailer time to reassess the conditions around the aged debt that may result in them not raising a "Debt CRC". Extending this period to two business days will allow for additional escalated reviews within the business, which will not affect the market, as it will remain a retro transfer process and therefore not delay the effective transfer date.	Refer to response in Table 1 item 81.
87.	5	Origin Energy	Origin questions the potential customer experience and notification requirements of a customer with debt being transferred to a prospective retailer and then transferred back to the current retailer within one day. Electronic notifications are set up to be issued to customers on transfers so a customer may receive a welcome letter from the new retailer and then "you did not transfer" letter from the current retailer. The mechanisms and costs associated with this 'exception' to current processes needs to assess – especially given the low volume of 'certified debt' objections raised in Victoria. AEMO suggests the number of objections are in the range of 0-50 objections per month – this represents 0.02% of transactions per month.	Refer to response in Table 1 items 79 and 81.
88.	5	Red Energy / Lumo Energy	Red and Lumo are concerned that the full impacts of the removal of the notification have not been properly assessed by AEMO in progressing this widespread market change. We believe that the only available avenue to address the above issues is to maintain a one business day notification period to market participants of a pending transfer. This would allow retailers to cancel pending meter	Refer to response to item 72 in regard to Governance arrangements and refer to response in Table 1 items 39.



No.	Question	Consulted person	Issue	AEMO response
			<p>installations or disconnections for non payment avoiding the negative customer impact as well as the penalties associated.</p> <p>Please also refer to Red and Lumo's commentary on the governance arrangements and Market notification of customer transfer provided.</p> <p>Market notification of customer transfer</p> <p>Red and Lumo continue to believe that the lack of sufficient examination of the impacts of the proposed changes is likely to have unintended consequences on both consumers and the wider market. Specifically, AEMO have provided no information on how the removal of the notification to retailers of a transfer or the implementation of a retrospective transfer will impact pending service order or metering requests in the market.</p> <p>Firstly, currently when a retailer raises a disconnections for non payment (DNP) service order this is able to be cancelled when a retailer receives a notification of a pending transfer to another retailer. Under the proposed changes a retailer would only become aware of a customer transfer after it has been completed and a new FRMP is in place. Without this notification, the previous retailer would have no opportunity to cancel the pending service order nor would the network likely accept the cancellation request as they are not listed as the current FRMP meaning their automated systems would reject the request.</p> <p>This creates a regulatory risk for retailers. If the service order completes as requested, and the retailer no longer the listed FRMP at the property, would this be considered a wrongful disconnection by the regulator as it had disconnected a property for which they were not the FRMP? Or would the winning retailer be liable for a disconnection which has taken place against a NMI for which they are FRMP where they have not carried out the required steps prior to the disconnection?</p> <p>Under the Victorian Government's Energy Fairness Plan the Government have proposed that "criminal penalties are also being upped to \$1 million for energy retailers who mislead or deceive customers, or systematically and wrongfully disconnect households."⁶ Retailers could therefore potentially face criminal penalties for disconnecting customers where they fail to cancel the service order request. This is very difficult to achieve where the retailer has received no notification of a pending transfer out to another retailer.</p> <p>Secondly, how would the removal of notifications impact a pending meter installation and the requirements around a planned interruption notification (PIN). Currently, retailers have a range of obligations around the installation of a new smart meter including the PIN and the associated power outage for installation. How will the removal of the notification for retailers impact an in flight meter installation and the obligations around the PIN? As previously raised, when retailers receive a</p>	<p>We note reference to Victorian Government's Energy Fairness Plan and the responsibilities this place on retailers. AEMO notes these responsibilities appear to provide incentives for retailers to establish procedures to manage these requirements.</p>



No.	Question	Consulted person	Issue	AEMO response
			<p>notification of a pending transfer they can contact the customer and confirm this is accurate and if so cancel the pending meter exchange. The removal of this notification will likely mean that there will be no opportunity to cancel this request. This would again mean that a retailer may have a pending meter exchange in process and lose a customer to another retailer in this time. If the meter exchange occurred the following day after a transfer with no opportunity to cancel would the new retailer be in breach of NERR rule 59C as the meter had been installed without the proper PIN being issued by the current FRMP?</p> <p>Red and Lumo are concerned that none of these impacts have been assessed or considered by AEMO in progressing this widespread market change. We believe that the only available avenue to address the above issues is to maintain a one business day notification period to market participants of a pending transfer. This would allow retailers to manage their regulatory risk by being able to cancel pending meter installations or disconnections avoiding both the negative customer impact as well as the penalties associated.</p> <p>⁶ https://www.premier.vic.gov.au/creating-jobs-and-driving-down-energy-prices/</p>	
89.	5	Simply Energy	<p>Aligned, however VIC should be aligned (Option 3) – Option 1 and 2 are essentially the same as zero business day objection wouldn't make any difference.</p> <p>Agree, however since option 3 (preferred option) links to a new CRC (proposed as CR 1061), Simply Energy believes that it should only be limited for in-situ transfers and not for move-in transfers due to the difference in these transfer types. In a move-in situation, CR1061 (proposed) must not be used and hence AEMO must ensure that there are validations in MSATS to prevent this from occurring.</p>	<p>AEMO notes that for move in/move out that VIC debt is not an available objection as there is a new customer at premises. Hence CR reversal does not apply and AEMO will apply validation to the usage of these CRCs. The procedures have been revised to reflect this restriction.</p>
90.	5	Tango Energy	<p>As the one day timeframe aligns with the current one day Objection period, the timing is viewed as reasonable. It is expected the 5 national business days notification of the objection by the new retailer to the customer and the 20 national business days resolution period will be accommodated under the proposed changes.</p>	<p>AEMO notes respondent's comment. AEMO is not changing debt processes, instead is providing a more efficient tool to reverse the transfer if a Victorian certified debt situation exists.</p>



No.	Question	Consulted person	Issue	AEMO response
91.	5	TasNetworks	TasNetworks considers that this would enable retailers to exercise the ability to prevent the customer switch.	AEMO notes the respondent's support for the proposed change.
92.	5	Vector Metering	Vector Metering does not agree that the new Debt Objection CR is required (See 4). However, should the proposed design be adopted, the proposed object logging period of 1 business day for a new DEBT objection CRC appears reasonable for the reversal.	AEMO notes respondent's comment.

Table 2 Issues Paper - Prospective transfer of the FRMP role

No.	Question	Consulted person	Issue	AEMO response
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?				
1.	6	AGL Energy	<p>On prospective transfer of the FRMP role, AGL supports AEMO's preferred Option 2 to retain the CRC1000 and redesign at Read Type Code level.</p> <p>AGL believes AEMO's proposed procedural changes to give effect to the HLD should be driven by the principle that, wherever possible, all transfers occur on an actual meter read.</p> <ul style="list-style-type: none"> - For accumulation meters, all Read Type Codes that meet the policy objective of AEMO's HLD should be available to retailers to ensure maximum flexibility and minimum costs in retailers' implementation including Required Read and Special Read. - For manually read interval meters, transfers should only occur on an actual read provided by the meter data provider for the nominated transfer date or a final substituted meter read. While we appreciate that these transfers would occur on Required Read, we recommend AEMO developing system controls to prevent the use of estimated read transfers within the Required Read option. <p>AGL supports AEMO's preferred Option 2 to retain the CRC1000 and redesign at Read Type Code level. AGL agrees that this option is more efficient and is likely to be less impactful and costly to implement than Option 1, given that retailers and MDPs are likely to have more material changes to systems to accommodate a new range of CRCs and retire old CRCs.</p> <p>However, in order to ensure that the transfer procedures best serve the long-term interests of electricity consumers consistent, AGL remains of the view that all transfers should occur on an actual meter read. In our submission to the AEMC's Consultation Paper on faster transfers², AGL</p>	AEMO notes respondent's comment and refer to response in Table 1 item 18. The proposed changes do not mandate that a retailer use a particular read type but provide retailers with a suite of options to offer to their customers.



No.	Question	Consulted person	Issue	AEMO response
			<p>recommended that transfers should occur on an actual meter read wherever possible. Below we provide more specific commentary on read and meter types.</p> <p><i>Accumulation meters (Type 6)</i></p> <p>In AGL's view, in the context of accumulation meters, all Read Type Codes that meet the policy objective of AEMO's HLD should be available to retailers to ensure maximum flexibility and minimum costs in retailers' implementation.</p> <p>AGL supports AEMO's proposal to retire the Next Scheduled Read Date (NSRD) Read Type Code for the purpose of transfers. We consider that, for the most part, Required Read would enable retailers to facilitate prospective customer switches within the proposed timeframe while allowing a degree of flexibility for incoming retailers to specify the date of completion based on customer preference.</p> <p>Special Read should also be retained as an alternative option for retailers. While we acknowledge AEMO's concern that in some instances Special Read may increase cost and delay where attempts to obtain a read fail, we also consider that Special Read provides an important avenue for retailers to expedite a transfer within the 2 business days post the 10-day cooling off period. AGL agrees with AEMO that unlike the used of NSRD, it is reasonable to retail Special Read to enable access to on-demand meter reading service in the case that a physical reading is explicitly required by a customer.</p> <p><i>Manually read interval meters (MIRM) (Type 5 or Type 4A)</i></p> <p>For MRIM, transfers should only occur on an actual read provided by the MDP or the nominated transfer date or a final substituted meter read. While we appreciate that these transfers would occur on Required Read, we would recommend AEMO consider developing system controls to prevent the use of estimated read transfers within the Required Read option. We anticipate substantial complexity for customers where a transfer is undertaken on the basis of an estimated read in these circumstances. In some instances, remediation in relation to estimated read of MRIM could entail a customer receiving three revised bills from their former retailer and two bills from their new retailer, causing substantial complexity for customers to navigate.</p> <p>² See AGL submission in response to Australian Energy Market Commission reducing customers' switching times (retail), draft rule determination (7 November 2019), available at https://www.aemc.gov.au/sites/default/files/2019-11/Rule%20Change%20SubmissionRRC0031%20-%20AGL%20Energy%20-%2020191106.PDF.</p>	
2.	6	Ausgrid	<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>	<p>AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.</p>



No.	Question	Consulted person	Issue	AEMO response
3.	6	AusNet Services	AusNet Services agrees with the proposed option 2 of retaining the existing prospective CRs. Other options involving the replacement of these CRs would create unnecessary changes and extend the cost of this procedure change.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
4.	6	Australian Energy Council	The AEC considers redesigning the existing CR's does not deliver benefits to customers, over and above their obvious costs. Retaining the CRC 1000 can deliver the same customer outcome.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
5.	6	CitiPower Powercor	For CitiPower Powercor both options present a significant cost and delivery challenge to have the necessary system changes. We would expect AEMO to allow a sufficient period of time for inflight transactions to run through their cycle, to completeness, as part of the transition activities.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
6.	6	Endeavour Energy	AEMO proposed to redesign existing CRs and allow for a phased transition. This approach introduces system complexities which are expensive and from experience would cause industry confusion, thus causing delays in transfers when retailers raise an incorrect CR. We suggest that a 'clean start' approach should be adopted. This is where all existing in-flight CRs are cancelled at the go-live date and new CRs are raised under the new framework. We note that the new framework is meant to be better for the customer, therefore this approach should not make any customer worse off. In addition to avoiding significant system change costs, we suggest that existing CRs should not be re-defined and instead that they should be maintained as is, unless they are to be deleted as they are no longer required. In a similar manner, we suggest that existing Read Type Codes should not be re-defined and instead that they should be maintained as is, unless they are to be deleted as they are no longer required. To introduce the changes that AEMO desires, we suggest that new Read Type Codes be introduced for existing CR Codes. This would help to foster a 'clean start' approach from a system point of view.	AEMO notes respondent's comment and refer to response in Table 1 items 2, 6 and 18.
7.	6	EnergyAustralia	EnergyAustralia disagrees with this option. In line with AEMO's preference, we prefer Option 2 (Retain the CRC 1000) as it would involve less system upgrade cost to AEMO and retailers, and can deliver the same outcome.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.



No.	Question	Consulted person	Issue	AEMO response
8.	6	Energy Queensland	Energy Queensland supports the retention of the existing CRC.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
9.	6	ERM Power	<p>Billing system changes and costs of adjustments and estimated reads</p> <p>Our view is that there should be no detriment to the customer or retailers (both incoming and outgoing) in the estimated read transaction. In the case of errors or mistakes occurring, it is important to ensure that any resulting costs are not levied on innocent parties. We do not support AEMOs proposed changes as:</p> <ol style="list-style-type: none"> 1. it leads to inaccurate billing: <ol style="list-style-type: none"> i. Every final bill for manually read interval metered (MRIM) customers will need to be adjusted and reissued following the receipt of actual reads after the site is transferred. ii. Final bills for basic meter customers who have one or more previously estimated bills will likely require an adjustment and a final bill to be reissued following the receipt of actual reads after the site is transferred. 2. it leads to operational inefficiencies and costs: <ol style="list-style-type: none"> i. Additional transactions are required for the reissue of final bills ii. Additional transactions for credit (collecting twice on a debt or refunding an overcharge). Further, recouping and crediting over and under-estimates is complicated, particularly when 2 retailers are involved, and a final bill has been issued. Where a customer's meter has been inaccessible for a long period and there have been several consecutive estimated bills, the reissued final bill may require large adjustments, and for underestimations this will likely be a high bill. Tracking a customer to provide a credit or debit will add further to administration costs. The likelihood of the outgoing retailer recouping costs is remote. AEMO's proposal will increase the financial risk burden to smaller retailers in a competitive market. iii. Estimate read costs will exceed that of a scheduled read for manually read metered customers. Therefore, the costs of prospective transfers will likely increase to customers. It is likely that MDPs will charge for the provision of the estimated read to cover the costs involved. Many retailers such as ERM Power do not have systems that create estimates for billing. Our use of estimates is limited to when a read is not available; supplied by the MDP, who creates the estimate in accordance with Metrology Procedures and jurisdictional requirements. To create an independent calculation of estimates would be a very substantial change to our billing system and would also result in a final bill 	<p>The matters raised by ERM Power have been considered by AEMO in foundation documents for this consultation. AEMO refers the respondent to AEMO's rule change proposal for customer transfers in the NEM, in particular section 4 of Appendix A.</p> <p>AEMO also refers the respondent to the consideration of reading methods and the use of estimated meter readings in section 4.4 of the Draft Report.</p>



No.	Question	Consulted person	Issue	AEMO response
			<p>being issued on a different read to that used for NUOS and market settlement purposes (as explained below).</p> <p>3. Estimated billing disputes will further add to operational costs when customers question reissued bills.</p> <p>4. Demand tariffs and generation-based estimates can exacerbate these issues above, as the estimate may be less readily determined.</p> <p>Even if a retailer chooses not to utilise an estimate read approach for a prospective switch (by selecting a special read), it will need to accommodate these costs for any customers that are lost to retailers that do use it. Manual workarounds to these transactions quickly become unsustainable and whilst these costs and risks may be minimal over a single customer, the risk is incremental over many customers transferring with an estimate. Retailers will need to pass these costs through to customers and loyal customers who do not transfer will be cross subsidising those that do. In our view, this proposal should not go ahead until a comprehensive cost benefit test is undertaken.</p>	
10.	6	ERM Power	<p>Impact to financial settlements</p> <p>ERM Power strongly supports the concept that parties to market settlement and other wholesale costs should not be subjected to negative financial impacts from the use of an estimated final read transaction. Using estimated data for transfers will lead to a mismatch between billing, network use of system (NUOS) charges and market settlement. Analysis and the extent of the impact has been omitted from AEMO's Issues Paper and downplayed in AEMO's HLD document.</p> <p>AEMO's proposal finalises the customer's bill on an estimate and in most cases will not allow for the accurate allocation of market acquisitions to align to the transfer date. The financial impact of this is unknown, and due to the lack of analysis presented by AEMO, we can only assume has not been modelled. We suggest that AEMO should fully explore this and in the context of the movement from settlement by differencing to global settlement.</p> <p>For non-interval data, actual load is critical for determining financial responsibility of acquisitions and distribution costs accurately and is used in settlement calculations. Any estimations in the earlier versions of settlement are eventually replaced with actual data and by the revision 2 settlement, a more accurate allocation of settlement is achieved. This is applicable for all metering installation types. By revision 2, type 6 actual data is shaped by the Net System Load Profile. Actual data, retrieved from a special read, or next scheduled read feeds into settlement accuracy and when the read is taken on the date of transfer, the allocation of market acquisitions between retailers is aligned to actual data. Similarly, through the use of an actual read, NUOS allocation between participants aligns to transfer.</p>	<p>AEMO refers the respondent to AEMO's rule change proposal for customer transfers in the NEM, in particular section 2.3.2 of Appendix A regarding settlement and the requirement for meter readings and change dates. The nature of half-hourly settlement for metering installations that record energy on an accumulation basis means that there is inherent inaccuracy determined by the design itself. The net system load profile applied for connection points with accumulation metering installations is not designed to be reflective of any one customer's energy consumption on any given</p>



No.	Question	Consulted person	Issue	AEMO response
			<p>We believe that final bill estimated data should be treated similarly to final substituted data for the calculation of wholesale settlement and network costs. Further, any estimation used for transfer should be restricted to customers whose previous bill was based on an actual read, limiting the impact of data inaccuracy. We suggest that AEMO explore the use of the existing read types (final estimates) if the analysis of transferring a customer within 2 days shows a net benefit.</p> <p>If the costs of Procedure and system changes are prohibitive to accommodate the alignment of final bill estimated data to wholesale settlement and NUOS data and allow the retailer to appropriately recoup imposed costs, it is ERM Power's strong view that that this Procedure change should not progress. It is unacceptable for AEMO to suggest that retailers should just unilaterally carry this risk.</p>	<p>quarterly reading cycle, week, day, or half hour.</p> <p>AEMO notes that retailers are empowered to reduce their risks regarding exposure to net system load calculations by installing remotely read metering installations.</p>
11.	6	ERM Power	<p>We oppose the layering of costs on system changes that will not add value</p> <p>We note that AEMO has proposed changes that are inconsequential to the initial ACCC recommendations 8 and 9, including reducing transfer time. We suggest at a time when costs pressures are felt across the industry, now is not the time for delivering zero value changes.</p> <p>AEMO's proposed changes remove existing CRCs that are currently used without any issues such as read type 'Existing Interval' (EI). Removal of prospective transfer change codes such as EI (Existing Interval), which is used to facilitate large customers for transfers will achieve no added value but will add additional costs for retailers. We strongly oppose the removal of this change code.</p>	<p>AEMO have chosen to retain Read Type 'EI' to reduce system change where the outcome is the same. Both EI and RR will have the same functionality, with EI restricted to 1-4 Metering Installations. There is no obligation to use EI when there is a 1-4 Meter at the connection point, either EI or RR could be used.</p> <p>There will be no objection available should the Customer Switch include a Type 5/6 meter and EI is nominated.</p>
12.	6	ERM Power	<p>Costly system changes should not be the go-to option for driving policy outcomes</p> <p>The proposal to transfer customers on estimated data was put to a rule change test in 2017 (Using Estimated Reads for Customer Transfers Rule 2017). AEMC rejected the rule proposal noting that "the introduction of an additional transfer option using estimated reads is not likely to be in the long-term interest of consumers and will not contribute to the achievement of the national electricity objective"⁸. It is our view that the basis for the AEMC's findings remain, and that transferring customers on inferior data is not in the long-term interests of customers.</p>	<p>AEMO refers the respondent to AEMO's rule change proposal for customer transfers in the NEM, where the case for change was considered including an assessment against the relevant market objectives. Further, AEMO</p>



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			<p>AEMO and the AEMC, in the recommendation to the COAG Energy Council Standing Committee of Officials, sought to overlook the AEMC's previous decision, which highlighted that the cost burden associated with estimated based transfers were likely to outweigh the benefits, complexity and risks, and was likely to result in a spike in complaints.⁹ None of these previously highlighted issues have been addressed in the HLD. Further, in its HLD document, AEMO has not established any evidence to show how transfer timeframes have deteriorated to the extent that it would warrant ignoring AEMC's previous decision.</p> <p>We suggest transfer times have likely improved, with the increase in of advanced meter installations from the Power of Choice reforms, further negating the need for changes in this area. Thorough and careful analysis of impacts, particularly an assessment on changes in the market since the AEMC's decision, should not be discounted and bypassed, so that reform can be fast tacked through mandated system changes. This will lead to a poor outcome from the failure to address those issues that were highlighted in the 2017 Rule request.</p> <p>⁸ AEMC 2017, Using estimated reads for customer transfers, Final Rule Determination, 2 February 2017, Sydney page i</p>	refers the respondent to the AEMC and AEMO joint advice to COAG on 3 rd December 2018 which precipitated AEMO's rule change request following COAG endorsement.
13.	6	Evoenergy	<p>Option 1 would require less testing time to implement over Option 2.</p> <p>Option 2 does require material changes to participant systems as the scope of a CR1000 changes.</p>	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
14.	6	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
15.	6	MEA Powershop	<p>Powershop believes that Option 2, to retain the Change Reason Code (CRC) 1000, is the preferable option. The provisions for 'Read Type Code' already exist within the current market procedures, therefore to replace the CRC 1000 with two new CRC's would be unnecessary. Powershop believes that under Option 2, any 'in-flight' transactions would remain largely unaffected.</p> <p>If the use of Next Scheduled Read Date (NSRD) is withdrawn, Powershop believes that any in-flight transfers using this read type code should be allowed to complete to prevent customer confusion. The customer switching process yields long term market benefits, hence an interim period of some customer switching using the NSRD is acceptable.</p>	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
16.	6	Momentum Energy	<p>Momentum supports AEMO's preferred option:</p> <p>Option 2 Retain CRC 1000 for insitu transfers and use the Read Type Code to facilitate the read type requested by the retailer.</p>	AEMO notes respondent's comment and refer to



No.	Question	Consulted person	Issue	AEMO response
			As mentioned in the Issues Paper this option retains the current CRC 1000 for insitu transfers and enables the implementation of new processes, via changes to the Read Type Codes, which will manage the approved read types applicable for each meter type. Option 2 is also preferred as it avoids any transitional arrangements related to Option 1 which involves the retirement of CRC1000 and the introduction of a new series of CRs for customer transfers.	response in Table 1 items 2 and 18.
17.	6	Origin Energy	Origin does not see benefit in either redesigning or replacing the current CRs and is of the view that the current CR's in the market would enable retailers to meet this requirement.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
18.	6	PLUS ES	PLUS ES strongly: <ul style="list-style-type: none"> • Supports the retention of the existing CR1000. This would enable participants to deliver the changes at a lower cost • Opposes the proposed change to remove the CR1010 – retrospective CR and dual purpose the CR1000 as a prospective and retrospective CR. Most Market Systems are built with a concept of Retrospective and Prospective transactions. Making the CR1000 both retrospective and prospective requires a much greater build. The CR1000 and CR1010 provide the same functionality at a significantly reduced price.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
19.	6	Public Interest Advocacy Centre	No, both options provide for a faster transfer while maintaining the opportunity for special reads to be taken. We prefer the redesign as it doesn't require re-raising of 'in flight' CRC 1000 customer switched and allows the retention of existing processes.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
20.	6	Red Energy / Lumo Energy	Red and Lumo support AEMO pursuing option 2. Retaining the existing CR1000 code with the amendment of only the Read Type code (RR, PR etc) to facilitate and manage the new transfer types in the NEM. Red and Lumo do not support the introduction of two new CRC. Red and Lumo support AEMO pursuing option 2 as proposed. Retaining the existing CR1000 code with the amendment of only the Read Type code (RR, PR etc) to facilitate and manage the new transfer types in the NEM.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
21.	6	SA Power Networks	Both options present a significant cost and challenge to deliver the necessary system changes required.	AEMO notes respondent's comment and refer to



No.	Question	Consulted person	Issue	AEMO response
			<p>Inflight transactions will present the industry with some challenges and AEMO should include information on how these will be address under either option as part of the next round of consultation.</p> <p>Please refer to feedback to question 30 regarding timeframes for delivery.</p>	response in Table 1 items 2 and 18 and Table 10 item 19.
22.	6	Simply Energy	<p>Aligned. No change warranted to the CR1000 structure, 'Read Type Codes' to be updated to meet the objective.</p> <p>Simply Energy agrees with AEMO's preferred option (Option 2) to retain CRC 1000. Simply Energy does not support retiring CRC 1000 and introducing new 10X0 series for customer switching. CR1000 is the most commonly used transaction and hence it has a high volume (as many as 213000 transfers raised NEM-wide each month as per AEMO's statistics), which makes it an extremely important transaction. Unless there are no other options, creating new CR10X0 series would amount to an overhaul of the transfer solution, however as suggested in the issues paper, option 2 enables existing processes to be retained to a large extent.</p>	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
23.	6	Tango Energy	The complexity and cost of process and system changes associated with the introduction of new CRCs outweighs those associated with changes to an existing CRC. Modifying existing CRCs will still allow automated processes to operate with minimal change.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
24.	6	TasNetworks	<p>TasNetworks considers that the option to re-design the current CR 1000 (option 2) is the preferred option and should simplify any system development work required.</p> <p>Regarding in-flight transactions, TasNetworks' assumption would be that all existing CR 1000 transactions, with a read type code of RR, would be automatically transitioned to Complete on day one after the change became effective, prompting the respective MDP's to submit the substitute readings.</p>	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
25.	6	United Energy	<p>For United Energy both options present a significant cost and delivery challenge to have the necessary system changes.</p> <p>We would expect AEMO to allow a sufficient period of time for inflight transactions to run through their cycle, to completeness, as part of the transition activities.</p>	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.
26.	6	Vector Metering	No. Vector Metering supports option 2. Transitional arrangements can be made if required.	AEMO notes respondent's comment and refer to response in Table 1 items 2 and 18.



No.	Question	Consulted person	Issue	AEMO response
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?				
27.	7	Ausgrid	<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 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>	AEMO notes respondent’s comment. AEMO proposes to remove the Read Type Code NS from the transfer process and retain the NSRD field for other uses, for example, publishing on customer bills or answering customer queries.
28.	7	AusNet Services	AusNet Services considers there is no compelling reason to remove NSRD. We agree that it is only used in the transfer process, but we have systems that expect it and that update it. Removing NSRD requires costly system changes and would be unnecessary to improving customer outcomes associated with this change.	AEMO notes respondent’s comment and refer to response in Table 2 item 27.
29.	7	Australian Energy Council	<p>The AEC considers that there is no negative customer outcome to retaining the ability for a transfer to occur on the NSRD. We note AEMO’s view that this read type is currently delaying the transfer process, but consider that with effective controls, and more importantly, incentives for retailers to transfer the customer as quickly as possible, these concerns can be mitigated.</p> <p>In the approach preferred by AEMO, retailers will be able to propose a CR date 65 days in to the future. Effectively, this allows a retailer to await the availability of the NSRD, and subsequently retrospectively transfer the NMI once the read is obtained. There does not seem a compelling reason as to why in this instance a retailer would not be able to merely propose the NSRD as a future change date.</p> <p>AEMO has also raised concerns that retailers in the current framework may be incentivised to delay lodging the transfer until close to the NSRD, impacting the accuracy of switching statistics. The AEC</p>	AEMO notes respondent’s comment and refer to response in Table 2 item 27.



No.	Question	Consulted person	Issue	AEMO response
			<p>accepts this view, but consider that the change to the procedures to remove the pending transfer notification will remove this perceived incentive.</p> <p>Practically under the new procedures, the AEC expects retailers will utilise the options available to transfer the customer as soon as possible, provided the level of read accuracy (or more likely, potential inaccuracy) does not increase complaint costs after transfer. In the scenario that the retailer sees a scheduled read is due to take place in the coming days, it is likely retailers will determine that the benefits of the accuracy of this read, outweighs the costs of the slight delay in transferring the customer. The AEC does not see any concern with this approach, and considers that retaining NSRD to be used appropriately (as retailers will be incentivised to do) minimises the handling costs of having to await the read to be completed, and then retrospectively raising a CR.</p>	
30.	7	Endeavour Energy	<p>AEMO proposed to delete the Read Type Code of NS (Next Scheduled Read Date) to support the objective of making transfers occur within 2 days. We note, for the scenario where an in-situ customer looks to switch retailers after receiving their electricity bill, AEMO explained that allowing a retrospective transfer to a previous read within the last 15 business days would provide customers a better experience than having to wait for the next schedule read date or obtaining a special read.</p> <p>For the scenario where an in-situ customer looks to switch retailers beyond 15 business days from their last bill then AEMO explained that they can still do so on an actual read via a special read, and now they also have the option to transfer on a substituted read.</p> <p>For the scenario where an in-situ customer wants to transfer on an actual read and coincidentally the next scheduled read is due soon (like within 2 days, the main objective of this change), then AEMO explained that the cost of a special read can be avoided if the retailer waited for the read to complete and then a retrospective change is arranged.</p> <p>For a move-in customer scenario, AEMO explained that in practice this generally requires a site visit to reconnect the customer and there is a stronger desire by customers to transfer on an actual read in this scenario. An added benefit is that the risk of any under or over charging is eliminated because an actual read is used instead of a substituted read.</p> <p>We believe that AEMO has considered all the scenarios for a customer changing retailers and agree with the removal of the Read Type Code of NS because it does not align with the objective of this change and there are alternate options that will provide the same or better customer outcome.</p>	AEMO notes the respondent's support for the proposed change.
31.	7	EnergyAustralia	<p>We do not support removing the NSRD from the customer switching process.</p> <p>We believe that the NSRD should be retained to support customer transfers within a reasonably short time period in the near future e.g. 12 days (10 business day cooling off period + 2 business days) or less (an "adjusted NSRD"). The exact timeframe should be the subject of more consultation.</p>	AEMO notes respondent's comment. AEMO is enabling the use of actual reads, some of which will align to previous



No.	Question	Consulted person	Issue	AEMO response
			<p>If this period is short enough then it can fully address the delay issues related to NSRDs that are the primary concern for AEMO.</p> <p>This “adjusted NSRD” is a cost-effective way to address concerns about delays, because it will use retailer’s existing systems and processes that already support the use of the NSRD. This will in turn reduce any pass through of additional system cost to customers.</p> <p>We expect AEMO will accept the “adjusted NSRD” as it is essentially the same as a special read (which also requires completion of a read in the future and which may also not happen).</p> <p>NSRDs are also the more attractive option compared to special reads and estimated reads:</p> <ul style="list-style-type: none"> • on a per read level, the costs of NSRDs are cheaper and they can deliver the same actual read • actual reads from an NSRD are more accurate than estimated reads. <p>The “adjusted NSRD” for switching purposes could be assessed moving forward, in the same way that AEMO are proposing to review how retailers complete transfers under the proposed changes. Lastly, AEMO has indicated that:</p> <p>(i) retailers will be able to select a proposed date for their transfer CR - up to 65 days in the future – which could align with a date after the NSRD has occurred, and then retrospectively transfer once the read is obtained.</p> <p>(ii) Equally we understand that retailers can wait until the next scheduled read has been performed and then submit a transfer CR at that time.</p> <p>Both these options would require system changes for some retailers, and for all retailers there would be process changes and training to operational teams.</p> <p>While EnergyAustralia welcomes this flexibility in a framework where NSRDs cannot be used at all, this seems to allow a retailer to defer a transfer to the NSRD via the retrospective transfer. This appears to negate the effect of removing the NSRD from the switching process in the first place. Nonetheless, a retailer may do this to benefit the customer by opting for an actual read in the future rather than an estimated read.</p> <p>We also consider the same effect of using the retrospective transfers for a future date under (i) and (ii) could be effectively achieved by adopting the “adjusted NSRD” without the need for retailers to change existing processes/training. Further, as noted above, the “adjusted NSRD” allows AEMO to address the delay issue by imposing a timeframe for its use, while the use of the retrospective read in (i) and (ii) does not.</p> <p>We strongly encourage AEMO to meaningfully consider the “adjusted NSRD”.</p>	<p>read dates, through the expansion of the available timeframe for retrospective transfer to 65 business days for manually read metering.</p> <p>AEMO refers to the submission and assessment discussion in Section 4.4 of the Draft Report.</p>



No.	Question	Consulted person	Issue	AEMO response
			If AEMO does not wish to consider the “adjusted NSRD” as a permanent solution, we suggest that it can be combined with existing special reads in the interim until a schema change can be made (if required for other changes).	
32.	7	Energy Consumers Australia	<p>In the Retail Electricity Pricing Inquiry, the Australian Competition and Consumer Commission (ACCC) found that “transfer times must be improved in order to promote more vibrant competition and enable customers to obtain the benefits of switching more quickly.”² The ACCC noted concern that the time needed for a switch to take effect meant that consumers could remain on uncompetitive offers for several months while waiting for a meter read. We also share these concerns. We therefore strongly support AEMO’s proposed changes which would reduce this switching time to no more than two days, or even allow switching to occur retrospectively. This will deliver better consumer outcomes and will increase the competitive pressure on retailers to deliver better and more affordable services.</p> <p>The Issues Paper notes that the reliance on a meter reading being taken before a customer can switch is a material barrier to a customer’s ability to benefit from a new offer. To facilitate faster switching, AEMO considers relying on the Next Scheduled Read Date (NSRD) is problematic as there is uncertainty as to when this read will actually occur, and there can be substantial time between the customer choosing a new offer and the read being taken. We agree that the removal of the NSRD as the basis for the transfer will enhance a customer’s ability to access retail products and services of their choice.</p> <p>Removing the NSRD from the process would mean that a customer switch could occur based on:</p> <ul style="list-style-type: none"> • a remote meter read (where a smart meter is installed); • the previous meter read; • an estimated read; or • a special read. <p>These options appear appropriate and would facilitate better customer outcomes. However we note that the option of transferring a customer on the basis of an estimated meter reading is already permitted by the national rules, but that retailers rarely transfer a customer on this basis.³</p> <p>² ACCC, Restoring electricity affordability and Australia’s competitive advantage, p.153.</p> <p>³ AEMC, Reducing customers’ switching times, Draft rule determination, 26 September 2019, p.14.</p>	AEMO notes the respondent’s support for the proposed change.
33.	7	Energy Queensland	Energy Queensland does not see a compelling reason to remove the NSRD and notes that there may be value in retaining this as an option subject to certain conditions. We also consider that the removal of notification to the losing Retailer is a more significant change and given that the losing	AEMO notes respondent’s comment and refer to response in Table 2 item 27.



No.	Question	Consulted person	Issue	AEMO response
			Retailer does not know that a customer is churning, we question whether there is a need to remove NSRD as an option.	
34.	7	ERM Power	ERM Power does not support the proposed restriction around the use of actual reads for transfer, particularly limiting the transfer time of prospective switches with the use of Read Required (RR) (unless a Special Read is selected in the case of manually read meters). AEMOs proposal will repurpose the use of the RR change type to facilitate the transfer as early as the next business day which will result in estimated read-based transfers for those customers that are not remotely read. This forces the outgoing retailer to generate a final bill based on an estimate reading without control of the outcome or costs imposed, and from the customers perspective, without consent. For manually read customers, prospective transfers will now likely occur at a cost to the customer, with either an estimate read or a special read. If these changes proceed, we expect unintentional consequences will eventuate, such as a dramatic increase in customer complaints surrounding estimated bills, given estimated bills are met with scepticism by customers and seen as inferior to actual reads. We believe the proposal will also lead to an increase in financial risk to retailers. Through analysing issues of Ombudsman cases and retailer complaints, it is evident that customers value accurate bills over transferring within a condensed timeframe. For customers that value a condensed timeframe for transfer, the options of having a Special Read is available now. Note, we support the retention of this read type as a feasible option. It is our view the changes will have a perverse outcome of undermining confidence in the retail market due to additional risks, complexity and costs from the use of estimated reads to transfer.	AEMO notes respondent's comment. The proposed changes do not mandate that a retailer use a particular read type but provide retailers with a suite of options to offer to their customers.
35.	7	Evoenergy	No need to retain the NSRD in the customer switching process. Do we have the NSRD or Last Read Date & Quality (LRDQ). There can be only One.	AEMO notes the respondent's support for the proposed change.
36.	7	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
37.	7	MEA Powershop	Powershop in its response to the AEMC's draft rule determination believed that the NSRD can present a free, quick and accurate customer experience, where the NSRD is close to the customer switching date. Powershop believes that AEMO could set guidelines where an NSRD switch is allowed – for example, within 10 business days of the customer switching date.	AEMO notes respondent's comment and refer to response in Table 2 item 1 and 27.
38.	7	Origin Energy	Origin support retaining the use of the NSRD in the customer switching process. It is important to provide customers with the transfer options of NSRD i.e. if the NSRD will be within the next week then the customer may want to wait as it would be cleaner from a billing perspective.	AEMO notes respondent's comment and refer to



No.	Question	Consulted person	Issue	AEMO response
			The NSW Energy Ombudsman states that there is a persistent subset of customers who object to estimated reads on principle. Customers should have the ability to choose the read type that best suits their circumstances.	response in Table 2 item 1 and 27.
39.	7	PLUS ES	<p>PLUS ES proposes to retain the NSRD for a customer FRMP churn, especially if the NSRD is within a few business days of proposed/requested date. This would be a better outcome from a customer, retailer and MDP perspective, as it would allow the FRMP churn to complete on a meter read.</p> <p>In the proposed model retailers will be unable to transfer with Actual readings, without a Special Read, even when the NMI is due to be read in the next 5 business days. Transfer Substitutions will lead to more disputes being fielded by the retailer and MDP.</p> <p>AEMO could reject any CR10xx raised with NS as the Read Type Code, where the NSRD is greater than 5 business days in the future.</p>	AEMO notes respondent's comment and refer to response in Table 2 item 1 and 27.
40.	7	Public Interest Advocacy Centre	<p>While not clearly compelling, retaining the NSRD would be valuable for a customer with a manually read meter that wants an actual read but isn't willing or able to receive a special read.</p> <p>Instances of this situation occurring would likely be low.</p>	AEMO notes respondent's comment and refer to response in Table 2 item 1 and 27.
41.	7	Red Energy / Lumo Energy	<p>Red and Lumo do not see any justification for the removal of the Next Scheduled Read (NSR) transfer option for consumers. AEMOs overarching goal aside from reducing transfer times should also be to improve consumer choice, not reduce it. Some retailers and consumers may choose to transfer on an NSR noting that the date of the transfer is an appropriate time that satisfies the consumer as it potentially meets the timeframe for an end of an agreement, hardship or payment arrangement the consumer already has in place.</p> <p>Retailers will always be motivated to choose the transfer option that will get the consumer supplied by the retailer in the quickest and most efficient method as this will allow the retailer to start billing the customer. While the next scheduled read may reduce in use over time as consumers become more adapted to the new transfer options available retaining the NSR will facilitate the maximum choice and best outcome for consumers.</p> <p>Please also refer to Red and Lumo's commentary on the Next Scheduled Read Transfers above.</p> <p>Next Scheduled Read Transfers</p> <p>Red and Lumo do not see any justification for the removal of the Next Scheduled Read (NSR) transfer option for consumers. AEMOs overarching goal aside from reducing transfer times should also be to improve consumer choice, not reduce it. Some retailers and consumers may choose to transfer on an NSR noting that the date of the transfer is an appropriate time that satisfies</p>	AEMO notes respondent's comment and refer to response in Table 2 item 1 and 27.



No.	Question	Consulted person	Issue	AEMO response
			<p>the consumer as it potentially meets the timeframe for an end of an agreement, hardship or payment arrangement the consumer already has in place.</p> <p>Retailers will always be motivated to choose the transfer option that will get the consumer supplied by the retailer in the quickest and most efficient method as this will allow the retailer to start billing the customer. While the next scheduled read may reduce in use over time as consumers become more adapted to the new transfer options available retaining the NSR will facilitate the maximum choice and best outcome for consumers.</p>	
42.	7	Simply Energy	<p>Aligned. Transfer should be independent of NSRD (reducing as smart meters are rolled-out). Hence, Option 2.</p> <p>Simply Energy is indifferent to the NSRD however there is no negative customer outcome in retaining the ability for a transfer to occur on the NSRD especially in the scenario where the retailer can identify (via NMI standing data), that a scheduled read is due to take place in coming days. It is likely that the benefits of the accuracy of this read outweighs the costs of the slight delay in transferring the customer. However, due to the unreliability of NSRD (+/-5 days threshold by meter data routers), MSATS procedures must be updated to make 'Proposed Change Date' as an optional field where 'NS' read type code is selected and as such CR1000 must then align the transfer completion date.</p>	AEMO notes respondent's comment and refer to response in Table 2 item 1 and 27.
43.	7	Tango Energy	<p>In light of the objective to reduce the time taken for a customer to transfer, use of the NSRD would appear counterintuitive given the NSRD can be up to 90 days or so in the future. The only consideration is a customer requesting the transfer on their NSRD, which again is unlikely as it is assumed the customer would want to take advantage of the New FRMP's offer as soon as possible. However, for 4A, 5 and 6 meters if the RR read type is going to produce an estimate, as no actual read is available, then the retailer may want the certainty of an actual read and not have to pay the costs associated with a SP. In these circumstances an NSRD would be appropriate.</p> <p>Providing information on the number of previous substitutions and the reasons for these will enable retailers to make informed decisions about the read type to be used for the transfer, avoiding over/undercharging and settlement issues.</p>	AEMO notes respondent's comment and refer to response in Table 2 item 1, 27 and 32. AEMO will be providing previous read dates and the associated quality flag for the previous read dates to support whether retailers choose to offer a retrospective transfer.
44.	7	TasNetworks	<p>The only minor risk that TasNetworks can foresee is that provision of substitute readings to facilitate the customer switching process may not be able to be performed within the proposed timeframes, depending on the solution implemented by individual MDP's.</p> <p>As opposed to the existing NSRD process, which is already being provisioned successfully on time via existing business processes.</p>	AEMO notes that MDPs must comply with requirements in the SLP MDP and AEMO is not changing the process for the calculation or delivery of the reads. AEMO's change is



No.	Question	Consulted person	Issue	AEMO response
			Should consideration be given to extending the window for providing the substitute read?	related to the trigger point for when an MDP performs their activities.
45.	7	Vector Metering	<p>Rather than retiring existing methods such as the use of the NSRD, the proposed design should complement the existing methods with new methods. Rather than changing the current definition of RR (Next Read Date) a new code indicating 'no actual read required' (maybe NA) should be contemplated. Retailers and Customers could then decide when their load should switch.</p> <p>Vector Metering does not support the removal of NSRD as part of the switching process as customers may agree that an actual read is required and that waiting until the NSRD has been obtained is suitable.</p>	AEMO notes respondent's comment and refer to response in Table 2 item 1 and 27.
Is there value in retaining an ability for a prospective change of FRMP role to occur based on a special reading?				
46.	8	Ausgrid	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. 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.	This obligation exists in the CATS Procedure in Tables 4-M and 4-N.
47.	8	AusNet Services	We consider that there is value in retaining the prospective change of FRMP role to occur based on a special reading. That value, is to avoid another unnecessary and costly change. Retaining prospective change of FRMP role to occur based on a special reading creates no detriment. Removing it appears to be change for the sake of change.	AEMO notes the respondent's support for the proposed change.
48.	8	Australian Energy Council	No position.	AEMO notes respondent's comment.
49.	8	CitiPower Powercor	Yes, we would be supportive of this.	AEMO notes the respondent's support for the proposed change.
50.	8	Endeavour Energy	We believe that there is value in allowing a prospective change of FRMP to occur based on a special reading. This is for the scenario where the customer or retailer wants to transfer on an actual read.	AEMO notes the respondent's support for the proposed change.
51.	8	EnergyAustralia	Yes. The special read is the best option for customers and retailers (outside of the NSRD being used appropriately). It provides the assurance of an actual read, and it can occur on a day agreed to by the customer. Special reads are also widely used by industry in the customer transfer process today and will involve less change to implement.	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
52.	8	Energy Consumers Australia	<p>We would not want to see a situation where retailers require a customer to have a special meter read (for a fee) in place of using an estimated reading.</p> <p>Special reads should only occur where a customer has initiated this request. In this case, a retailer should make a customer aware of any additional costs of the read upfront so they can make an informed decision as to whether to go ahead with the special read or choose an alternate basis for the transfer.</p>	AEMO notes respondent's comment.
53.	8	Energy Queensland	We agree to the retention of a prospective change of FRMP role based on a special reading for instances such as where the site has been estimated over a long period of time due to lack of access, or where customers want to switch at a particular date or within a particular window	AEMO notes the respondent's support for the proposed change.
54.	8	Evoenergy	Yes, as this gives the customer choice, and they are willing to pay for that choice. However if access is an issue, then a substituted read should be allowed for this also rather than the FRMP having to cancel and try again.	AEMO notes the respondent's comment and that a cancellation needs to occur if there is no access for a special read. The SP has been specifically designed for enabling a transfer on an actual read. A substitute read transfer can be achieved by raising a RR.
55.	8	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
56.	8	MEA Powershop	Powershop believes that the ability for a customer to switch based on a special reading needs to remain. Restricting the ability for a basic meter customer to transfer on an actual reading could cause significant customer dissatisfaction. The above EWON data represents a strong consensus that many customers prefer not to transfer retailers on a substituted read and for that reason, the ability to request a special read should remain.	AEMO notes the respondent's support for the proposed change.
57.	8	Origin Energy	Origin supports retaining the ability for a prospective change of FRMP role to occur based on a special reading. Like the NSRD, this allows prospective FRMP's to provide customers with a choice on how a read could be obtained to be able to transfer.	AEMO notes the respondent's support for the proposed change.
58.	8	PLUS ES	PLUS ES supports the option for a special reading to be an option for manually read meters, during a FRMP churn. It would allow a customer to transfer on an actual read rather than an estimate. This	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
			would mitigate any possible disputes with the final billing, which would ultimately impact the MDP with validating the meter data provided.	
59.	8	Public Interest Advocacy Centre	Yes, providing procedures limit the potential for these to become commonplace/the default and retaining the ability does not have a large administrative cost that will be passed onto consumers.	AEMO notes respondent's comment.
60.	8	Red Energy / Lumo Energy	Yes, a special read transfer should be retained by AEMO as a basis for the changing FRMP in the market. Currently, many retailers use a special read to provide consumers with certainty of their transfer date and many consumers have become accustomed to this. AEMOs overarching goal aside from reducing transfer times should also be to improve consumer choice, not reduce it. Please also refer to Red and Lumo's commentary on the Next Scheduled Read Transfers above.	AEMO notes the respondent's support for the proposed change and refer to response in Table 2 item 41 in regard to Next Scheduled Read Transfers.
61.	8	SA Power Networks	Yes, we would be supportive of this option.	AEMO notes the respondent's support for the proposed change.
62.	8	Simply Energy	Yes, this would be particularly useful where a customer wishes to transfer on an actual read. This also provides a wide range of options available to the retailer that in-turn can be made available to the customer.	AEMO notes the respondent's support for the proposed change.
63.	8	Tango Energy	It is understood the five Read Type Codes to be available are RR, SP, PR, UM and GR. There is concern over the use of the RR Read Type Code. It is understood for type 4A, 5 and 6 meter types, the MDP will provide a substituted read for the transfer as no site visit will occur. If this is a 'one off' substitution, the risk to the retailers involved in the transfer process is viewed as minimal. However, if there has been a series of substitutions prior to that provided for the transfer read, there is a risk that substantial over/undercharging could occur. If known to the Prospective FRMP these previous substitutions had occurred, the choice could be to select a SP. In order for retailers to make informed decisions regarding the transfer and to reduce the risks associate with over/undercharging, how does AEMO propose to make information available to the Prospective FRMP (e.g. number of consecutive previous estimates)?	AEMO intends to make available previous read dates and the quality flag associated with those reads up to 12 months in the past.
64.	8	TasNetworks	There are two scenarios that TasNetworks considers will require the use of a special reading. 1. Aligning a change of retailer with the re-energisation of a NMI. This would require a re-energisation service order and an associated CR 10XX with an SP read type code.	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
			2. To align a change of retailer with the retrieval of an actual reading at a NMI that has experienced two or more consecutive substituted scheduled readings. This would eliminate the possibility of a large adjustment or settlement between the two retailers when the future actual reading is provided.	
65.	8	United Energy	Yes, we would be supportive of this.	AEMO notes the respondent's support for the proposed change.
66.	8	Vector Metering	Vector Metering does not support the removal of SP as part of the switching process as customers may agree this is suitable.	AEMO notes the respondent's support for the proposed change.

Table 3 Issues Paper - Retrospective transfer of the FRMP role

No.	Question	Consulted person	Issue	AEMO response
With the NSRD no longer able to be used to facilitate prospective customer switches, is there value in maintaining access to the NSRD in NMI Discovery?				
1.	9	AGL Energy	While AGL supports the retiring of NSRD for the purpose of transfers, AGL recommends that AEMO maintain access to the NSRD in NMI Discovery. Retailers rely upon the NSRD for a range of other processes beyond transfer of a site, including: <ul style="list-style-type: none"> The NSRD value drives meter reading unit update in our systems to determine if a site is on monthly or quarterly billing cycle; and On customer requests, retailers also rely upon the NDSD value to advise on next meeting reading. 	AEMO proposes to remove the Read Type Code NS from the transfer process and retain the NSRD field for other uses, for example, publishing on customer bills or answering customer queries.
2.	9	Ausgrid	No Comment.	AEMO notes respondent's comment.
3.	9	AusNet Services	AusNet Services considers removing the NSRD is a costly and unnecessary change that would disrupt our 5-minute settlements implementation program. We recommend avoiding this change and adopting the solution outlined in the issues paper option 2 involving the batch process and MSATS browser interface.	AEMO notes respondent's comment and refer to response in Table 3 item 1.



No.	Question	Consulted person	Issue	AEMO response
4.	9	Australian Energy Council	Yes. As noted above, retailers will be required to agree with a customer on the most appropriate read to transfer the site, taking into consideration both accuracy and speed. Maintaining access to the NSRD is not inconsistent with the objective of next day transfers, yet enables retailers and customers to agree on a low cost, accurate transfer when timing allows.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
5.	9	Endeavour Energy	We believe that there is value in maintaining the NSRD in NMI Discovery to help the New FRMP decide whether to transfer on a special read or wait to retrospectively transfer after the NSRD.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
6.	9	EnergyAustralia	We understand from meeting with AEMO representatives on 21 November that the NSRD will remain in MSATS standing data and in NMI discovery type 2. We agree with this and emphasise that some retailers may rely on the NSRD in NMI discovery for billing cycle purposes.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
7.	9	Energy Queensland	There is value in maintaining access to NSRD in NMI Discovery as it enables the conversation with the prospective customer regarding any potential future bills, and enables a better discussion on future payment and products, etc.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
8.	9	ERM Power	Any proposal to remove the visibility or access to the Next Schedule Read Date should not progress. According to the National Energy Retail Rule 25(m), 'contents of a bill', retailers are required to provide the estimated date of the next scheduled meter reading for those customers that have manually read meters. Removing this field would require significant change to billing systems and would place a retailer in breach of this obligation.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
9.	9	Evoenergy	Access to the NSRD will assist the retailer in setting up their billing cycles, and if the NSRD is within 10 days, they may wish to opt for that date as the transfer date, with no cost to the customer. Do we have the NSRD or Last Read Date & Quality (LRDQ). There can be only One.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
10.	9	IntelliHUB Group	Not really.	AEMO notes respondent's comment.
11.	9	MEA Powershop	Powershop believes that there is merit in retaining the NSRD in National Metering Identifier Discovery, even if the NSRD is no longer able to be used for customer switches. Customers seeking to determine the date of their next meter read is a common enquiry, therefore having the information on hand is important for our call centre agents. Furthermore, it is important for a retailer to know when a reading is scheduled so that they can follow up with the Metering Data Provider if required.	AEMO notes respondent's comment and refer to response in Table 3 item 1.



No.	Question	Consulted person	Issue	AEMO response
12.	9	Origin Energy	Yes. As per Origin comments in question 8, Origin support retaining the NSRD which will allow for consultation with the customer when determining what read would be used to transfer. The meter read type will depend on the customers need for meter reading accuracy, speed of transfer and costs associated with the read type.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
13.	9	PLUS ES	PLUS ES recommends maintaining the NSRD (see response to Qn 7). Maintaining the NSRD in the NMI Discovery would enable the FRMP to advise the customer and make informed decision on their options when switching retailers.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
14.	9	Red Energy / Lumo Energy	Red and Lumo believe that there is no compelling reason to remove the NSRD and believe that this should be maintained. Please also refer to Red and Lumo's commentary on the Next Scheduled Read Transfers above.	AEMO notes respondent's comment and refer to response in Table 3 item 1. Refer to response in Table 2 item 41 in regard to Next Scheduled Read Transfers.
15.	9	Simply Energy	Yes, as mentioned in response to Q7, regardless of NS being maintained or removed as a read type code, NSRD it is an extremely useful piece of data and provides value in various retail processes, not limited to retail transfers. For example, one of the most common questions asked by customers is 'when is my meter getting read next?' and agents use this data to form their response.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
16.	9	Tango Energy	The NSRD for accumulation meters is still linked to the quarterly billing cycle and required on bills to notify customers when the next read will occur. The NSRD is provided in the NEM13 file. Having access to the NSRD when talking to the customer about transferring may be beneficial in terms of explaining they will transfer before their NSRD.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
17.	9	TasNetworks	TasNetworks considers the NSRD will still be required as it allows the retailer to communicate the next scheduled reading date to the customer. This is currently also provided in NEM13 payloads, however a new FRMP would not have this information at the time of a customer signing up, plus the date can be amended by the MDP at any point before the NSRD and communicated to the FRMP via a CR 5071.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
18.	9	Vector Metering	NSRD provides Retailers with information on the timing of manual read cycle. This information drives retailers billing systems. It seems that <u>removing</u> this from NMI discovery has no benefit and may introduce unintended consequences for retailers. Vector does not see a compelling case to remove this from NMI discovery.	AEMO notes respondent's comment and refer to response in Table 3 item 1.
How critical is the Read Quality information to the potential use of the Last Read Date for retrospective customer switching?				



No.	Question	Consulted person	Issue	AEMO response
19.	10	Ausgrid	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.	AEMO notes respondent's comment and intend to provide the previous read date and associated quality flag from data provided to AEMO via MDM.
20.	10	AusNet Services	No response provided	AEMO notes respondent's comment.
21.	10	Australian Energy Council	The AEC considers that read quality is critical when discussing the last read date. As noted above, the option used to transfer the site will require retailers to undertake an assessment of the costs and benefits of each approach. A significant period of estimates prior to transfer on another estimate only increases the risk of inaccuracy, and ultimately a poor customer experience. As noted in Q9, additional information will not delay transfers, but may enable better customer outcomes.	AEMO notes respondent's comment and intend to provide the quality flag alongside the previous read dates.
22.	10	Endeavour Energy	No comment	AEMO notes respondent's comment.
23.	10	EnergyAustralia	<p>EnergyAustralia considers Read Quality to be critical in the context of considering whether to use it to support a transfer. Retailers need to know if the previous read was actual or an estimate so they can exercise a fully informed choice whether to use the previous read. As AEMO is aware, there are risks around using an estimate, they can result in billing discrepancies and a poor customer experience. If adding Read Quality will result in a schema change, we support this and suggest an interim solution can be adopted as per Question 7.</p> <p>Schema upgrades can require a retailer to make changes to multiple systems e.g. gateways, integration platforms, and billing systems. We expect that the schema changes for these customer switching changes would involve material costs. It would not be efficient to make these schema changes in isolation, as the benefits of delivering the changes a few months ahead of scheduled schema changes do not warrant the standalone cost. There are efficiencies at both the retailers' and AEMO's ends, in combining these changes with other initiatives that require schema changes (such as the NMI standing data review).</p>	AEMO notes respondent's comment and refer to response in Table 3 item 21.
24.	10	Energy Queensland	Energy Queensland considers the Read Quality information is relevant.	AEMO notes respondent's comment and refer to response in Table 3 item 21.



No.	Question	Consulted person	Issue	AEMO response
25.	10	Evoenergy	No comment	AEMO notes respondent's comment.
26.	10	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
27.	10	MEA Powershop	Powershop believes that if AEMO proceeds with using the last read date for retrospective customer switching, the read quality information is critical for the smooth implementation of this change. This will enable better provision of customer information, allowing customers the choice of choosing a special read if they don't wish to transfer on an estimated last read.	AEMO notes respondent's comment and refer to response in Table 3 item 21.
28.	10	Origin Energy	Origin views read quality as critical. This will allow retailers to make an informed decision with regards to the read option suitable for the customer. If the previous meter read had been an estimated read, the retailer may request a special read to start a new account with the customer. Origin supports consideration on parameters on the number of estimated reads that are allowed prior to a transfer. The greater the number of estimates reads, the greater the inaccuracies there will be with the transfer. Knowing estimated read history may provide an opportunity for the retailer to work with the customer to obtain an actual read.	AEMO notes respondent's comment and refer to response in Table 3 item 21.
29.	10	PLUS ES	PLUS ES believes the Read Quality information is very important, especially if transfers are in dispute. Customers should have the ability to be informed and choose the read quality they wish to switch with. For example, they may want to only switch retailers on an actual read.	AEMO notes respondent's comment and refer to response in Table 3 item 21.
30.	10	Public Interest Advocacy Centre	We consider this is important and should be retained.	AEMO notes respondent's comment and refer to response in Table 3 item 21.
31.	10	Red Energy / Lumo Energy	Red and Lumo support the introduction of two new fields in the National Meter Identifier (NMI) discovery known as the last read date and quality field. We understand this would require a schema change as well as the introduction of a new CRC to populate the information but support this proposal. Red and Lumo believe that retrospective transfers should only be allowed to be completed on an actual meter read allowing allowing certainty for both consumers and market participants involved. We believe that the use of actual meter reads will allow consumers certainty that the last bill from the previous retailer will be the final bill from that retailer and they will not be rebilled once an actual read is received. The use of estimated reads here will only increase confusion amongst consumers as they will not be confident this will be the final invoice. As noted above, we believe that a schema change should be pursued as the best outcome, facilitating the introduction of both the previous	AEMO notes respondent's comment and refer to response in Table 3 item 21. The proposed changes do not mandate that a retailer use a particular read type but provide retailers with a suite of options to offer to their customers.



No.	Question	Consulted person	Issue	AEMO response
			<p>read date as well as the read date quality in the NMI discovery process to adequately support this process.</p> <p>Please also refer to Red and Lumo's commentary on the Changes to facilitate the retrospective transfer process above.</p> <p>Changes to facilitate the retrospective transfer process</p> <p>Red and Lumo believe that the introduction of a retrospective transfer does provide a positive benefit to consumers as well as the wider market and believe that the proposed 15 business day timeframe is a good balance between the interests of participants and consumers when considering the impacts of wholesale as well as networks settlements. Furthermore, we believe that there is no reason that a retrospective customer transfer should be limited to customers with a manually read interval meter. We believe that this transfer process correctly set up with the adequate information published in the market as a new field in the NMI discovery should be available to customers with both a basic and interval meter. We believe that while limiting this option may assist in encouraging customers in taking up smart meters it would disadvantage a large group of existing consumers who still have basic meters and would create a duplication of processes based on meter type that would need to be managed.</p> <p>However, we believe that retrospective transfers should only be allowed to be completed on an actual meter read allowing allowing certainty for both consumers and market participants involved. We believe that the use of actual meter reads will allow consumers certainty that the last bill from the previous retailer will be the final bill from that retailer and they will not be rebilled once an actual read is received. The use of estimated reads here will only increase confusion amongst consumers as they will not be confident this will be the final invoice. As noted above, we believe that a schema change should be pursued as the best outcome, facilitating the introduction of both the previous read date as well as the read date quality in the NMI discovery process to adequately support this process.</p>	
32.	10	Simply Energy	<p>Aligned (Option 1)</p> <p>Read Quality information is highly important as one of the key reasons to utilise retrospective transfer is to leverage an actual read which is known for its accuracy. As such, the read quality makes the whole difference in determining whether retrospective transfer adds value to the customer.</p> <p>Simply Energy has reviewed the three options provided in the issues paper regarding retrospective changes of the FRMP role and agrees with AEMO's preferred option, i.e. option 1 to introduce two new fields (last read date and read quality), for the following reasons:</p> <ul style="list-style-type: none"> • future proof solution that can be automated, 	AEMO notes respondent's comment and refer to response in Table 3 item 21.



No.	Question	Consulted person	Issue	AEMO response
			<ul style="list-style-type: none"> provides a complete set of information from last read to next read, allows flexibility and optionality to retailers to determine their most appropriate transfer logic, assist in customer queries and complaints resolution when required, avoids manual extraction of standing data, unlike option 2, and avoids repurposing of existing fields, unlike option 3. 	
33.	10	Tango Energy	The Current Quality Method will be used to determine if the read can be used for transfer. Refer also to the comments to Question 8. It may be appropriate to use the previous read if substituted but not if reads prior to the previous read have also been substituted. It is also noted the NEM13 contains the Previous Quality Method. This may also provide additional information, if provided in the NMI Discovery, as to whether the previous read is suitable to use for the transfer.	AEMO notes respondent's comment and refer to response in Table 3 item 21 and Table 2 item 63.
34.	10	TasNetworks	TasNetworks does not consider the read quality is critical to the retrospective customer switching process. Given that prospective transfers will be based on substituted readings, TasNetworks sees little value in the previous read quality being known for the purpose of undertaking a retro customer switch.	AEMO notes respondent's comment.
35.	10	Vector Metering	<p>Vector Metering's understanding of the proposed design is that new data elements Last Read Date and Last Read Quality will be captured and will reflect the previous read.</p> <p>In circumstances where this Last Read was a substituted read (indicating access issues) then one could expect that the quality flag will most useful in indicating the risk related to the accuracy of the estimated read that retailers will use to support a transfer. The actual consumption (once determined) could be different from the estimated consumption that would be used to finalise a customer bill.</p> <p>It appears prudent that the quality of the previous read this is made available to retailers.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 21.
Are there other matters that AEMO should consider regarding the three options presented, or any alternative options that AEMO might consider?				
36.	11	Ausgrid	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.	AEMO notes respondent's comment and refer to response in Table 3 item 19. AEMO notes where a CRC does not align to a previous read date, for PR read types AEMO will validate a read exists for that date (regardless of quality) and



No.	Question	Consulted person	Issue	AEMO response
				reject, where it is RR read type then a substitute read will need to be provided by a MDP.
37.	11	AusNet Services	<p>Participants are currently in the process of comprehensively updating our metering data management systems for the 5-minute settlements changes. Having significantly advanced our program, AusNet Services is concerned the proposed changes associated with option 3 would disrupt our 5-minute settlements program and hence result in higher costs and risks.</p> <p>However, option 2 avoids unnecessary impacts on the participants that provide metering data and are building systems for 5 minute settlements. The issues paper seems to not choose option 2 based on the need to avoid changes to retailers' batch interface system. We question whether many retailers have provided AEMO with these formal positions or quantified this cost. From our perspective, the proposed option 3 is more costly for customers and disrupts our 5-minute settlements program.</p>	AEMO notes respondent's comment. AEMO has chosen to proceed with Option 1 and AEMO will provide the data from information provided to MDM.
38.	11	Australian Energy Council	No position.	AEMO notes respondent's comment.
39.	11	CitiPower Powercor	<p>CitiPower Powercor prefer Option 2, as information is already provided to the market, it's a low-cost option as no new build is required.</p> <p>Also, we would expect that this would only apply to manually read meters because the volume of CRs created for AMI meters daily would flood the market and create Stop files. The best way to avoid this scenario is option 2.</p> <p>Option 1 & 3 will require significant system build, involvement of external vendors and considering we will be in the midst of the 5MS & GS program a May 2020 delivery is impossible.</p> <p>Our preference for the go-live of changes relating to this rule change is after July 2021.</p> <p>Our business would be happy to discuss and provide further clarification to AEMO of the work and effort involved.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 37.
40.	11	Endeavour Energy	<p>We note that AEMO's proposal to introduce two new fields (Last Read Date and Last Read Quality Flag) is to allow a retrospective transfer to occur on this date provided it is within the last 15 business days. The use case for this is that the customer receives their electricity bill, which prompts them to consider changing retailers for a better rate, service or product. Allowing the retail transfer to occur on the last bill date would produce an outcome whereby the customer can end their contract with their current retailer effective from the last bill date and can enjoy the benefits offered by the new retailer immediately.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 37.



No.	Question	Consulted person	Issue	AEMO response
			<p>AEMO is seeking feedback on this proposal, in particular how this can be best achieved in practice. Please see below our suggestion in order of preference:</p> <ol style="list-style-type: none"> 1. We wish to highlight that AEMO's proposal may not work well for customers who are on a 'bill smoothing' product whereby their last bill date may be after the last read date. To better achieve AEMO's intent we suggest that the two new fields be 'Last Bill Date' and 'Last Bill Quality Flag' and that the current FRMP be obligated to maintain these fields. This option would require the MDP to substitute the metering data if a reading does not exist for the transfer date. 2. Should AEMO use the 'Last Read Date' and 'Last Read Quality Flag' then we suggest that this is best achieved by not duplicating the same information through the introduction of two new fields. Instead AEMO should utilise existing available information and make it discoverable via NMI Discovery. This is in essence what is described in Option 2, however we encourage AEMO and retailers to work together to find a format that requires minimal system modification, for example existing RM reports should be explored to avoid the disadvantages AEMO described for option 2. 3. If AEMO insists on introducing the two new fields, then we suggest AEMO populates these fields with the information that they receive. This is a hybrid of option 1 and 2 that AEMO described and provides the benefit that only party, AEMO, needs to make system changes instead of many MDPs needing to make system changes. 4. Lastly, if AEMO insists on introducing the two new fields and mandating that the MDP be responsible for maintaining these fields then we suggest that this be done by modifying the CR5070 & CR5071 change requests to include these two new fields. This will help to minimise the volume of transactions given that in most instances these two fields will need to be updated at the same time as the NSRD. <p>Note that we do not support option 3 that AEMO described as we believe that there is value in maintaining the NSRD in MSATS – see our response to question 9 for more detail.</p>	
41.	11	EnergyAustralia	No comment.	AEMO notes respondent's comment.
42.	11	Energy Queensland	<p>Energy Queensland suggests that AEMO could consider an option to reuse the NSRD field, but only provide the last read date where the quality flag is Final or Actual. This approach would give Retailers confidence that if that date was within a Retrospective period they could safely churn using that read with minimal impact to settlements.</p> <p>We also suggest that, considering the changes that are required by all Market Participants to their systems to facilitate this change in the short timeframe specified in this document, there should be</p>	AEMO notes respondent's comment and refer to response in Table 3 item 37.



No.	Question	Consulted person	Issue	AEMO response
			an option to minimise the impacts as an initial implementation, with the view to implement a schema update at a later date to facilitate the optimum solution.	
43.	11	ERM Power	<p>International reforms as an optimal benchmark to pursue requires actual analysis</p> <p>AEMO points to adoptions of reforms in international markets as justification to drive reforms in the NEM. This reasoning is made without analysis as to whether the reforms were beneficial in those markets compared to markets prior to the changes, or whether policy outcomes were achieved. Existence of these reforms in other international markets alone do not prove merit for adoption here.</p> <p>In our submission to the AEMC, Reducing Customers' Switching Times, Consultation paper, 4 July 2019 ERM Power noted the New Zealand Electricity Authority (Authority) has grappled with the persistent barrier to new entrant retailers due to saves and early win backs, suggesting a reduction in transfer times had little impact on this issue.</p> <p>Recent analysis has been conducted on the impact of New Zealand's save protection scheme which prohibited the outgoing retailer from initiating contact until after the switch. The Authority found that whilst the number of saves fell, the number of win-backs increased as a result of the scheme¹⁰. This finding, that incumbent retailers moved from save activity pre-transfer, to win back activity post-transfer brings into question whether system changes around pre-transfer notification, including removing the information advantage of a pending transfer notification to the outgoing retailer, would have any effect in creating a more even playing field.</p> <p>In our submission to the AEMC, given overseas experience, we noted that an outright ban on save activity itself, coupled with a time restriction on the commencement of win back activity may have more of an effect in achieving the policy intent of reducing save activity. It is interesting to note that in the last few weeks New Zealand appears to be moving to do just that, with the Government endorsing a plan to outlaw win back offers, given its previous reforms were ineffective.</p> <p>In the United Kingdom, switching based on estimated billing have not always brought positive outcomes to consumers. Final bills have been delayed, and bill estimation continues to plague the reforms. In consideration of these reforms, it should be noted that the Ofgem's switching reforms of next day transfers were planned to be in parallel to a mandated roll out of smart meters. In its reform proposal Ofgem noted that:</p> <p>"Energy suppliers must take all reasonable steps to roll out smart meters to domestic consumers and small business customers by the end of 2020. The smart meter rollout is already under way and, as at 30 June 2017, more than 7.5 million smart and advanced meters were operating across Great Britain. This means that most consumers will already have smart meters installed when the Switching Programme changes would come into effect."¹¹</p>	<p>AEMO used international examples for information purposes and as a useful juxtaposition in considering the lack of any material reform regarding customer switching in the NEM, outcomes for customers and the common use of estimated meter readings to enable customer switching for manually read metering installations in those markets.</p> <p>AEMO did reference statistics from the NZ Electricity Authority which demonstrate a correlation between a reduction in switching time and increase in customer participation in customer switching.</p> <p>AEMO notes that 'win back' activity is not a matter that is within the scope of AEMO procedures, however the respondent might wish to approach the appropriate authority if seeking to have changes made regarding 'win back' activity by retailers in the NEM.</p>



No.	Question	Consulted person	Issue	AEMO response
			<p>The NEM is a very different market, and existence of market reforms internationally does not preordain that adoption of those reforms in the NEM will bring positive outcomes. Proper analysis must be undertaken.</p> <p>¹⁰ Electricity Authority Final report on Post Implementation review of saves and winbacks, 29 August 2017, page ii</p> <p>¹¹ Ofgem Delivering Faster and More Reliable Switching: proposed new switching arrangements, 21 September 2017 page 13</p>	<p>AEMO notes that the model being adopted in the UK market is not one that was proposed by AEMO, although AEMO noted in the rule change proposal that it might provide value in the ongoing enhancement of customer switching, the design of which can be determined as the market evolves, including consideration of the deployment across the NEM of remotely read smart meters.</p>
44.	11	Evoenergy	<p>Yes.</p> <p>An alternative would be Option 1, and part of Option 2.</p> <p>Agree that the introduction of two new fields (Last Read Date and Read Quality) will aid in a retailers decision making process, but these fields and values should not be populated by the MDP and flooding the market with more CR's. These fields and values should be derived by MSATS, who in the long term, will receive all these values from meter data files from MDPs.</p>	<p>AEMO notes respondent's comment and refer to response in Table 3 item 37.</p>
45.	11	IntelliHUB Group	Option 2 is preference.	<p>AEMO notes respondent's comment and refer to response in Table 3 item 37.</p>
46.	11	MEA Powershop	<p>Powershop believes that Option 1 is the most viable option. Option 2 should not be considered because it would not provide the required information to the participant in real-time, whilst Option 3 omits the important information of a read quality flag, meaning the benefits of the change will not be fully realised.</p>	<p>AEMO notes respondent's comment and refer to response in Table 3 item 37.</p>
47.	11	Origin Energy	No comment.	<p>AEMO notes respondent's comment.</p>
48.	11	PLUS ES	<p>PLUS ES supports Option 2: The Last Read Date and Read Quality is delivered to AEMO via the NEM files. It also does not require a schema change – more cost effective.</p> <p>PLUS ES does not support AEMO's proposed Option 1 & Option 3.</p>	<p>AEMO notes respondent's comment and refer to response in Table 3 item 37.</p>



No.	Question	Consulted person	Issue	AEMO response
			<p>Option 1: the proposal would require the MDP to build system processes to deliver the information already provisioned in the NEM file. This option also requires multiple CR transactions and a schema change. Not cost efficient for participants.</p> <p>Option 3: PLUS ES supports the retention of the NSRD and the Read Quality flag, which this option does not allow for. Providing a Last Read Date only, in the NMI Discovery, does not deliver the benefits to justify the costs associated with the proposed changes.</p>	
49.	11	Red Energy / Lumo Energy	<p>Red and Lumo support AEMO pursuing Option 1.</p> <p>We support the introduction of two new fields in the National Meter Identifier (NMI) discovery known as the last read date and quality field. We understand this would require a schema change as well as the introduction of a new CRC to populate the information but support this proposal.</p> <p>See response to question 10.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 31 and 37.
50.	11	SA Power Networks	<p>Option 2 is our preference it appears to be the lowest cost option to implement.</p> <p>Option 1 & 3 will require significant system build, involvement of external vendors and would make a May 2020 delivery impossible.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 37.
51.	11	Simply Energy	Simply Energy agrees with AEMO's preferred option on this matter.	AEMO notes the respondent's support for the proposed change.
52.	11	Tango Energy	Refer to 10 above.	Refer to response to Table 3 item 33.
53.	11	TasNetworks	<p>TasNetworks is of the opinion that AEMO could create the two new fields, for Last Read Date and Quality, and auto populate these fields with values derived from reading data received from the MDP.</p> <p>We are aware that only tier 2 NMIs will have this data supplied. However once 5MS is implemented, AEMO will receive this data for all NMIs.</p> <p>TasNetworks does not see value in having MDP's creating two new fields via a transaction that could quite easily be superseded when 5MS is implemented in July 2021.</p> <p>Further to this, TasNetworks considers that, given the low volumes of retrospective customer transfers (15%) of which the majority are performed using the CR 1040 (which presumably use a service order or at least the previous read date is already known), there may not be value in implementing a new transaction to service this low volume of FRMP changes.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 37.



No.	Question	Consulted person	Issue	AEMO response
			In addition, if the new retailer was not able to source the last read date or quality, there would only be a maximum of 15 days difference between a retrospective transfer and the newly proposed prospective transfer based on a substitute reading. Therefore not a significant financial difference for the new FRMP and the customer would simply receive one more final account from their old FRMP.	
54.	11	United Energy	<p>United Energy prefer Option 2, as information is already provided to the market, it's a low-cost option as no new build is required.</p> <p>Also, we would expect that this would only apply to manually read meters because the volume of CRs created for AMI meters daily would flood the market and create Stop files. The best way to avoid this scenario is option 2.</p> <p>Option 1 & 3 will require significant system build, involvement of external vendors and considering we will be in the midst of the 5MS & GS program a May 2020 delivery is impossible.</p> <p>Our preference for the go-live of changes relating to this rule change is after July 2021.</p> <p>Our business would be happy to discuss and provide further clarification to AEMO of the work and effort involved.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 37.
55.	11	Vector Metering	<p>Re-purposing existing fields for another use is bad practice and should be avoided. If new fields are required in the data model, then create them.</p> <p>The effort required to make a change to a schema is not where the costs is. It is the processes required to populate and consume new data elements that create the cost. Where data sits in a schema is of little consequence.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 37.
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?				
56.	12	Ausgrid	<p>Ausgrid does not agree with the proposed 5072 CR, this will cause duplication in the market. 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>	CR5072 has been removed as the MDP is no longer updating Last Read Date.
57.	12	AusNet Services	We do not disagree with the presented considerations in relation to using recent readings to support customer switching. However, we note any change to systems and process needs to be justified with benefits.	AEMO notes respondent's comment.
58.	12	ACT Civil and Administrative Tribunal	Issues may arise with a transfer to a new retailer where the previous retailer has allowed a large debt to accrue, possibly in association with their hardship program management. Many customers do not understand that when they change retailers the debts accrued with their previous retailer become	AEMO notes the comments around debt and that if a customer is transferring at a



No.	Question	Consulted person	Issue	AEMO response
			<p>due and payable. This could result in increased direct debt collection action and in the number of electricity default credit listings increasing. The rules should require the potential gaining retailer to explain that debts to a previous retailer will become due and payable and that debts to their previous retailer will not be covered by the previous retailers' hardship program if a transfer occurs. The system must provide for customer self reads, to reduce reliance on estimates as far as is possible. In order to avoid conflict between the losing and gaining retailer, the customer self-read should be sent by the gaining retailer to the distributor as an integral part of the transfer process. Smart (advanced) meters support real time data transfer if communication software (comms) are in place. However, there may be issues for smart meters which do not have comms, in that consumers often get confused on how to read these meters. The same issue could occur for analogue meters which have dials. The estimate may need to be corrected when an actual read is taken, which may create issues for the losing retailer.</p> <p>Further, the use of estimates for analogue meters and advanced meters without comms to achieve two day transfers could lead to a high level of problems in the ACT due to the basis on which estimates are made. Unfortunately, estimates in the ACT are often inappropriate because of the high level of seasonal variation and the widespread use of bill smoothing to even out utility costs over a whole year.</p>	<p>previous read date then the value of energy from the transfer date changes to the new retailer. Outside of Vic there are no obligations to suspend a transfer for debt. AEMO notes the comments around the use of customer self read, this matter is currently being considered by the AEMC in their Reducing Customers Switching Times consultation. AEMO notes seasonal variations are catered for in market procedural requirements for the calculation of substituted data, these substitutes are provided as reads for usage by retailers. Parties are able to propose improvements to those procedures, however, those changes are not within the scope of this consultation.</p>
59.	12	Australian Energy Council	The AEC supports the position that retrospective transfers should only apply to manually read meters. For remotely read meters, the objective of next day transfers can be met without the risks caused by retrospective transfers.	AEMO notes respondent's comment.
60.	12	Endeavour Energy	We wish to highlight that AEMO's proposal may not work well for customers who are on a 'bill smoothing' product whereby their last bill date may be after the last read date. To better achieve AEMO's intent we suggest that the two new fields be 'Last Bill Date' and 'Last Bill Quality Flag' and that the current FRMP be obligated to maintain these fields	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
61.	12	EnergyAustralia	We agree with AEMO's discussion.	AEMO notes the respondent's support for the proposed change.
62.	12	Energy Consumers Australia	We welcome AEMO's proposal to enable in-situ customer transfers (those where a customer does not move to a new premise) to occur retrospectively which goes beyond the concerns identified in the ACCC Retail Electricity Pricing Inquiry to deliver greater consumer benefits. As identified in the Issues Paper, allowing a retrospective customer transfer would simplify the billing process for the consumer (avoiding multiple bills for the same billing period) and would ensure the retailer and the consumer can have confidence in the accuracy of the meter reading.	AEMO notes the respondent's support for the proposed change.
63.	12	Energy Queensland	We agree that AEMO has presented the relevant issues, with the primary issue relating to payment products.	AEMO notes the respondent's support for the proposed change.
64.	12	Evoenergy	Agree with presented information.	AEMO notes the respondent's support for the proposed change.
65.	12	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
66.	12	MEA Powershop	Powershop believes that the considerations and options presented by AEMO are reasonable. Powershop notes that retailers do have specific obligations in relation to the content of final bills for small customers. These would need to be considered where a losing retailer has already issued a bill to a customer, which subsequently becomes a final bill following a retrospective transfer.	AEMO notes the respondent's support for the proposed change.
67.	12	Momentum Energy	<p>Momentum agrees that greater use of retrospective customer transfers is an important aspect of reducing customer switching times. This will ensure customers transfer promptly and on actual reads eliminating any customer complaints regarding inaccurate estimated reads. It will also minimise any customer rebilling and is fair to all retailers and customers involved in the transaction.</p> <p>We fully support the changes required to deliver greater transparency (via MSATS and NMI Discovery) of previous actual reads and the quality of these reads to facilitate retrospective transfers.</p> <p>While Option 1 (Introduction of the two new fields last read date and read quality) will require a schema change it will support more automated processes than the alternative Option 2 suggested by AEMO.</p>	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
68.	12	Origin Energy	Retrospective transfers are only relevant to manually read interval meters. Retrospective transfers are supported to ensure that customers are able to be billed on an actual read if there had been one in the past 15 business days.	AEMO notes respondent's comment.
69.	12	PLUS ES	<p>PLUS ES is seeking clarification of what is to occur where:</p> <ul style="list-style-type: none"> a Retrospective Reading for CR1000 RR is requested before an Actual Manual Reading Date. Transfer Read is Substituted, Actual Read is received the next day (or shortly after) and is lower than the Transfer Reading. Transfer Reading must be updated. <p>Customer Switching must address and limit the amount of times that the Transfer Reading will need to change. This will lead to disputes.</p>	AEMO notes that this will occur as per the current process within the MDP SLP and Metrology Procedure Part B.
70.	12	Public Interest Advocacy Centre	Yes, and we suggest no additional considerations.	AEMO notes the respondent's support for the proposed change.
71.	12	Red Energy / Lumo Energy	See response to question 10.	Refer to response to Table 3 item 31.
72.	12	Simply Energy	<p>Simply Energy has identified a contradiction between the amendment in MSATS procedure (page 51 of marked up version) and the issues paper. On page 51 the definition of "Previous Read – PR" is not limited to manually read meters and as such, type 4A, 5 and 6 have been struck off. However, in the issues paper, AEMO suggested that retrospective transfers should only apply to manually read meters. Simply Energy agrees with the issues paper and considers that remotely read meters are not to be included in scope of PR read type code. Moreover, as per the response to Q10, Simply Energy does not understand the value of including Last read date and read quality for remotely read meters (including VIC AMI) as the data is always available.</p> <p>Simply Energy suggests that read type code PR should be no earlier than today (since today's date is also considered retrospective) however for manually read meters (including COMMS4A), this could be extended to up to 10 business days in the past.</p>	AEMO notes the use of PR and other read type codes have been adjusted in this draft determination.
73.	12	Tango Energy	Refer to 10 above.	Refer to response in Table 3 item 33.
74.	12	TasNetworks	TasNetworks considers that, given the low volumes of retrospective customer transfers (15%) of which the majority are performed using the CR 1040 (which presumably use a service order or at least the previous read date is already known), there may not be value in implementing new transactions to service this low volume of FRMP changes.	AEMO notes respondent's comment. AEMO has chosen to proceed with Option 1 and AEMO will provide the data



No.	Question	Consulted person	Issue	AEMO response
			Are the Last Read and Quality required in MSATS now? When 5MS is implemented could these fields potentially be superseded as AEMO should be able to derive this information from the reading data provided?	from information provided to MDM.
75.	12	Vector Metering	There are field activities that will be impacted by retrospective changes. While retrospective FRMP changes already occur today introducing processes that use a retrospective read date as a matter of course is likely to increase the occurrences of field work being performed on behalf of a losing retailer that is subsequently churned out of the role with an effective date that is prior to when the work was performed. This could result in customers being billed for field work performed on a day that the retailer no longer has a relationship with the customer (but did at the time). This could be very confusing for a customer.	AEMO notes respondent's comment. AEMO refers to the submission and assessment discussion in Section 4.2 of the Draft Report.
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'?				
76.	13	AGL Energy	On retrospective transfer of the FRMP role, we recommend the retrospective 'window' be expanded to 40 business days to enable customers to benefit from more competitive offers to the greatest extent possible and to provide a larger window for the retailer to locate an actual read which will also improve the customer experience of the transfer by minimising possible re-issuing of bills that could be caused by estimated reads. AGL recommends that AEMO's proposed 15 business day 'window' in which a recently obtained metering reading could be used to support a retrospective in-situ customer switch be extended. In order to ensure an optimal customer outcome, AGL considers the retrospective 'window' should enable switching customers to benefit from more competitive offers retrospectively to the greatest extent possible. Given that the retrospective 'window' timeframe is intended to reference a recently obtained metering reading, AGL considers that this reading could be dated back as far as 40 business days. Accordingly, we would recommend that the retrospective 'window' be extended to a maximum of 40 business days.	AEMO has reviewed the window and to allow for use of the last Previous Read for manually read meters has opened the window to 65 business days for Read Type Code PR.
77.	13	Ausgrid	No Comment.	AEMO notes respondent's comment.
78.	13	AusNet Services	AusNet Services agrees, in principle, with the proposed 15 business day window for retrospective customer switching. However, given the change may result in Registered Participants needing to make system changes, and we are already working on 5 minute settlements, we should not be changing the window for retrospective customer switching in 2020.	AEMO notes respondent's comment and refer to response in Table 3 item 76.



No.	Question	Consulted person	Issue	AEMO response
79.	13	ACT Civil and Administrative Tribunal	<p>The ACAT suggests that the period for retrospective transfer be short and certainly no more than 15 days. A much longer period of retrospectivity may harm the losing retailer and may also have unintended consequences for the transferring customer.</p> <p>There was uncertainty in the slides for the meeting, as the graphic on page 12 refers to a 15 day transfer ('Day – 15'), while on page 15 the reference is to a '15 business day transfer'. A 15 business day transfer would provide a longer window at times when many consumers are at their most financially exposed (Christmas and Easter) due to child care costs/needs, children/family expectations. Usage generally occurs daily, not on a business day basis, in low income households.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 76.
80.	13	Australian Energy Council	<p>We are comfortable with 15 days, provided it is only an option available to retailers. The AEC has been advised that in some circumstances, such as where the available read is from a date prior to a price change occurring, retrospective transfers may not deliver a positive customer experience. In circumstances such as these, we expect retailers will be able to opt to utilise an alternative read type, despite the presence of an available read.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 76.
81.	13	Endeavour Energy	<p>We do not see any issue with an in-situ retrospective transfer of up to 15 business days. We note that some customers are on a monthly billing cycle via a 'bill smoothing' product and therefore see that there would be issues if the allowable retrospective transfer days approaches the billing cycle days. We see that 15 retrospective business days provides sufficient time for customers to engage with a new retailer from the time of their last bill without impacting on market functions.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 76.
82.	13	EnergyAustralia	<p>EnergyAustralia supports the proposed option for a retrospective transfer based on a recently-obtained meter read. We note, however, that some retailers will need to make system and process changes to utilise this option and we ask that this be considered in AEMO's decisions around implementation timeframe.</p> <p>EnergyAustralia believes a 15-business day window to use the recently-obtained meter read is reasonable.</p>	AEMO notes respondent's comment and refer to response in Table 3 item 76.
83.	13	Energy Consumers Australia	<p>Further, we consider that the retrospective limit of 15 business days could be extended, to allow a customer to switch based on a date at any time since the last meter reading (potentially up to three months).</p> <p>Retailers may consider that this approach would increase their risk of exposure to the wholesale market if a substantial number of consumers were to switch in the same settlement period. However, we consider that this is unlikely, and even so, it provides incentive for the retailers to continue to act to ensure their consumers are on the best deal. Further, as retailers are now responsible for the roll out of smart meters to their customers, we consider that it is within their control to limit their risk</p>	<p>AEMO notes respondent's comment and refer to response in Table 3 item 76.</p> <p>Consumer advocates noted large customer usually have fixed term contracts with associated liabilities on early termination and in practice</p>



No.	Question	Consulted person	Issue	AEMO response
			exposure by accelerating this roll out. The installation of a smart meter would mean that a customer transfer could occur at any time, based on an accurate consumption reading.	most transfer at end of contract to avoid these liabilities, thus, large customer exposure for hedging is limited. Only small customer exposure may occur and energy volumes are small.
84.	13	Energy Queensland	We agree that 15 days is reasonable for a retrospective in-situ customer switch.	AEMO notes respondent's comment and refer to response in Table 3 item 76.
85.	13	ERM Power	It is our view any retrospective time threshold beyond 15 days, may have severe implications for a retailer's wholesale risk management. This is particularly the case for those retailers that are the outgoing retailer to large multi-site customers (comprising of hundreds of small business customer sites) and where load has been hedged.	AEMO notes respondent's comment and refer to response in Table 3 items 76 and 83.
86.	13	Evoenergy	Agree with the 15 business days.	AEMO notes respondent's comment and refer to response in Table 3 item 76.
87.	13	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
88.	13	MEA Powershop	Powershop believes that the 15 business day window is reasonable. We also suggest that such a window could be acceptable for future transfers, using the NSRD.	AEMO notes respondent's comment and refer to response in Table 3 item 76.
89.	13	Momentum Energy	We note that AEMO has suggested a period of up to 15 business days for retrospective transfers. Momentum is of the view that this period could be extended to 40 business days (limited to type 4A, 5 and 6 meters) so that the use of previous actual reads can be maximised. AEMO advised the AEC, at a recent retailer meeting, that the proposed transfer system will allow prospective transfers up to 65 business days with agreement from a customer. This means that retailers would have a range of over 105 business days to search for either past actual reads or prospective read dates to effect a transfer. Moreover special reads can also be considered as another alternative before estimated reads are contemplated. We also propose that the retrospective period should not be available to customers with Vic AMI or type 4 meters as actual reads are available for every prospective day for these meters.	AEMO notes respondent's comment and refer to response in Table 3 item 76.



No.	Question	Consulted person	Issue	AEMO response
			We believe that estimated reads may not be necessary if the retrospective range is extended to 40 days and we urge AEMO to consider this option. As mentioned previously estimated reads do not instil customer confidence in any transaction and they impose an uncontrollable risk on the losing retailer caused by the winning retailers' choice to use estimated reads.	
90.	13	Origin Energy	Origin supports the proposed 15 business day 'window' in which a recently obtained meter reading could be used to support a retrospective in-situ customer switch.	AEMO notes respondent's comment and refer to response in Table 3 item 76.
91.	13	PLUS ES	PLUS ES has no issue in providing the <u>recently</u> obtained meter reading to support a retrospective in-situ customer switch, irrespective of the timeframe determined. The Read Type Code of PR should be used and the MDP should be able to object if the date in the CR does not align to the last read (i.e. the last read date or the last read) with DATEBAD.	AEMO notes respondent's comment and refer to response in Table 3 item 76. AEMO notes where a CRC does not align to a previous read date, for PR read types AEMO will validate a read exists for that date (regardless of quality) and reject, where it is RR read type then a substitute read will need to be provided by a MDP.
92.	13	Public Interest Advocacy Centre	We support a 15 business day 'window', however, any lengthening or shortening of this window should consider the administrative burden on losing retailers, including from the need for pre-payments to be reimbursed to switching customers, costs of which would be passed through to consumers.	AEMO notes respondent's comment and refer to response in Table 3 item 76.
93.	13	Red Energy / Lumo Energy	Red and Lumo believe that the introduction of a retrospective transfer does provide a positive benefit to consumers as well as the wider market and believe that the proposed 15 business day timeframe is a good balance between the interests of participants and consumers when considering the impacts of wholesale as well as networks settlements. Please also refer to Red and Lumo's commentary on the Changes to facilitate the retrospective transfer process above.	AEMO notes respondent's comment and refer to response in Table 3 item 76. Refer to response to Table 3 item 31 in regard to Changes to facilitate the retrospective transfer process.
94.	13	Simply Energy	The farther we go back in winning the customer, the probability of offer mismatch increases unless fully automated, which is possible but highly complex.	AEMO notes respondent's comment and refer to response in Table 3 item 76.



No.	Question	Consulted person	Issue	AEMO response
			<p>Simply Energy suggests that the proposed 15 business day window is reduced to 10 business days (in line with CR1040), to reduce the risk of overlapping bills and their consequences, including reissued bills, customer credits and refunds, and additional customer correspondence, which impact both losing and winning retailers.</p> <p>As a benchmark, in other jurisdictions gas distributors use a 'deemed read' provision that goes back 10 business days, with only limited impacts on retail billing systems.</p> <p>In addition to limiting this window for only manually read meters, Simply Energy strongly disagrees with lengthening of this window any further.</p> <p><i>From a losing retailer perspective:</i></p> <p>Each customer has a specific billing cycle (let's say 1st of each month) and considering a customer who has already been billed on 'Actual' reads (VIC AMI and COMMS4), the invoice can be issued on 1st of each month (billing days for last 30 days) and as such, any retrospectivity can cause more inconvenience to the customer as this could trigger a cancel-rebilling scenario. The farther we go back in days, the bigger the concern because the customer may have paid the invoice and a reversal of credit or refund is needed, requiring the customer to further engage with the losing retailer.</p> <p><i>From a winning retailer perspective:</i></p> <p>In principle, retailers should be able to transfer a customer as far back as 15 business days or beyond however there will always be instances where a particular product/offer is only available from (say) 1st July onwards and the customer compares the prices online before making the switch however CR is raised on (say) the 5th July. If a winning retailer then decides to win this customer from (say) 15th June or even before, the price the customer expects does not correspond to the June product because of the timing issue, leading to confusion and complaints.</p>	
95.	13	Tango Energy	15 business days is viewed as a suitable retrospective timeframe for transfers.	AEMO notes the respondent's support for the proposed change.
96.	13	TasNetworks	TasNetworks does not see any compelling reason to extend the window past the current 10 business days or to a further extent, once the ability to churn based on a substitute read on the next business day is implemented, will there be as much demand for retrospective customer transfers?	AEMO notes respondent's comment and refer to response in Table 3 item 76.
97.	13	Vector Metering	15 days seems ok. Should there be a requirement you must use the latest previous read if there were more than one read available in the 15 days?	AEMO notes respondent's comment and refer to response in Table 3 item 76.



No.	Question	Consulted person	Issue	AEMO response
Is the proposed inclusion of a retrospective customer switch in the CRC 1000 a preferable outcome to the creation of a new specific CRC for this purpose (liked to questions in section 3.1.2)?				
98.	14	Ausgrid	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.	AEMO notes respondent's comment and refer to response in Table 1 item 2.
99.	14	AusNet Services	No response provided	AEMO notes respondent's comment.
100.	14	Australian Energy Council	No position.	AEMO notes respondent's comment.
101.	14	Endeavour Energy	We disagree with AEMO's proposal to redefine CR1000 to become both prospective and retrospective because this would require significant system changes for little benefit. We suggest that CR1000 be maintained for prospective transfers only and CR1010 be maintained for retrospective transfers.	AEMO notes respondent's comment and refer to response in Table 1 item 2.
102.	14	EnergyAustralia	Yes, this would appear to require the least change for AEMO and retailers.	AEMO notes the respondent's support for the proposed change.
103.	14	Energy Queensland	We consider that the introduction of new CRs will increase complexity in the implementation and transitioning process.	AEMO notes respondent's comment.
104.	14	Evoenergy	As mentioned above, this will require extensive industry testing due to the modifications to validations and use of this Change Request.	Refer to response to Table 1 item 13.
105.	14	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
106.	14	MEA Powershop	Powershop believes that the CRC 1000, using the Previous Read type code, is already fit-for-purpose for facilitating transfers of this type. Powershop believes that a new CR type would not produce any additional benefits and would require system upgrades that would incur unnecessary costs.	AEMO notes the respondent's support for the proposed change.
107.	14	Origin Energy	Yes – Origin supports the extension of the date period of the current CR1000.	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
108.	14	PLUS ES	<p>PLUS ES does not support the proposed inclusion of a retrospective customer switch in the CR1000 or the creation of a new specific CRC.</p> <p>PLUS ES supports and recommends that CR1010 is maintained and amended as required. This would provide a more efficient outcome for the participants by reducing the operational impacts to metering business and system processes, resulting in lower costs:</p> <ul style="list-style-type: none"> Significantly less changes in system logic to maintain current CRs. i.e. CR1000 (prospective) CR1010 (retrospective) Less operational change management activities i.e. reporting, training, work instructions 	AEMO notes respondent's comment and refer to response in Table 1 item 2.
109.	14	Red Energy / Lumo Energy	Red and Lumo support the proposal put forward by AEMO to amend the existing retrospective transfers to facilitate the new customer transfer options.	AEMO notes the respondent's support for the proposed change.
110.	14	Simply Energy	<p>Instead of creating a new CRC, Simply Energy agrees with AEMO's preferred position that read type codes changes can lead to the same outcome with minimal impact to the structure of CR1000.</p> <p>Simply Energy does not consider that a specific CRC is needed for retrospective customer switch, as including it as a valid option in CRC 1000 achieves the same goal.</p>	AEMO notes the respondent's support for the proposed change.
111.	14	Tango Energy	Yes. Refer to the response to Question 6.	AEMO notes the respondent's support for the proposed change and refer to response to Table 2 item 23.
112.	14	TasNetworks	From these two options, using the CR 1000 for prospective and retrospective is preferable. However would it not be even easier to keep the CR 1010 in use for retrospective transfers as it is currently (with similar tweaks to objection rules and timeframes)?	AEMO notes respondent's comment and refer to response in Table 1 item 2.
113.	14	Vector Metering	Yes, however the changing read type codes is not necessary. There is already a Previous Read Date (PR) that can be used for retro CR1000 previous read date. RR should be left for NSRD. Customers and retailers may agree this getting an actual read at the Next Schedule Read Date is an appropriate trigger for the transfer to occur.	AEMO notes respondent's comment and refer to response in Table 1 item 2 and 18.
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'?				
114.	15	Ausgrid	No Comment.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
115.	15	AusNet Services	AusNet Services agrees, in principle, with the proposed 15 business day window for retrospective customer switching. However, given the change may result in Registered Participants needing to make system changes, and we are already working on 5 minute settlements, we should not be changing the window for retrospective customer switching in 2020. The marginal benefit in allowing a 15 business day window over and above a 10 business day would not appear to justify the implementation costs.	AEMO notes respondent's comment and is maintaining the 10 business day window to align with length of the cooling off period.
116.	15	Australian Energy Council	No position.	AEMO notes respondent's comment.
117.	15	Endeavour Energy	Similar to our response to question 13 we do not see any issue with a move-in retrospective transfer of up to 15 business days provided it is made clear in the procedure, and AEMO enforces this through MSATS validation, that a CR1040 is only allowed on an actual meter reading.	AEMO notes respondent's comment and refer to Table 3 item 115
118.	15	EnergyAustralia	See response to question 13.	Refer to response to Table 3 item 82.
119.	15	Energy Queensland	We agree the proposed extension of 5 days is reasonable.	AEMO notes respondent's comment and refer to Table 3 item 115
120.	15	Evoenergy	Agree with the 15 business days.	AEMO notes respondent's comment and refer to Table 3 item 115
121.	15	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
122.	15	MEA Powershop	Powershop does not object to this change. Powershop would like to emphasise that the draft rule determination presented by the AEMC relates to in-situ transfers only and questions whether the CRC 1040 for move-in customers should be contained within the scope of this change.	AEMO notes respondent's comment and refer to Table 3 item 115
123.	15	Origin Energy	Origin support the extension from 10 to 15 business days.	AEMO notes respondent's comment and refer to Table 3 item 115
124.	15	Public Interest Advocacy Centre	We are not concerned about the lengthening of the period. However, we note any lengthening or shortening of this window should consider the administrative burden on losing retailers that would	AEMO notes respondent's comment and refer to Table 3 item 115



No.	Question	Consulted person	Issue	AEMO response
			be passed through to consumers, including from the need for prepayments to be reimbursed to switching customers.	
125.	15	Red Energy / Lumo Energy	Red and Lumo support the extension of this transfer to 15 business days and believe that this provides a balance the interests of participants and consumers when considering the impacts of wholesale as well as networks settlements. Please also refer to Red and Lumo's commentary on the Changes to facilitate the retrospective transfer process above.	AEMO notes respondent's comment and refer to Table 3 item 115 and to response to Table 3 item 31 in regard to Changes to facilitate the retrospective transfer process.
126.	15	Simply Energy	Simply Energy considers that CR 1040 should be unaltered from 10 business days as it is currently and suggests that the PR (new proposed read type code for CR1000) should also be brought in line with CR1040, i.e. 10 business days for manually read meters.	AEMO notes respondent's comment and refer to Table 3 item 115
127.	15	Tango Energy	15 business days is viewed as a suitable retrospective timeframe for transfers.	AEMO notes respondent's comment and refer to Table 3 item 115
128.	15	TasNetworks	TasNetworks does not see any compelling reason to extend the window past the current 10 business days or to further extent, once the ability to churn based on a substitute read on the next business day is implemented, will there be as much demand for retrospective customer transfers?	AEMO notes respondent's comment.
129.	15	Vector Metering	15 days seems ok. Should there be a requirement you must use the latest previous read if there were more than one read available in the 15 days?	AEMO notes respondent's comment and refer to Table 3 item 115
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?				
130.	16	Ausgrid	No Comment.	AEMO notes respondent's comment.
131.	16	AusNet Services	AusNet Services considers there appears to be no business reason for restricting retrospectively switching customers with smart meters, except prospective customers with smart meters works today. Instead, the question should be asked whether there are quantifiable customers for changing from status quo. Otherwise this change is unnecessary and costly.	AEMO notes respondent's comment. AEMO has made amendments based on meter data types. The proposed changes do not mandate that a



No.	Question	Consulted person	Issue	AEMO response
				retailer use a particular read type but provide retailers with a suite of options to offer to their customers.
132.	16	Australian Energy Council	<p>The AEC supports competitive retail markets that enable customers to obtain the benefits of engagement as quickly as possible.</p> <p>That being said, we do not support transfers occurring prior to explicit informed consent being obtained, unless it is beneficial to all parties. For manually read meters, this benefit includes the ability of the losing retailer to bill on actual data, and avoids costs incurred from inaccurate estimates.</p> <p>For remote meters, where the practical benefits do not exist as the read is always available, Retailers should be able to win the site as soon as they wish, but not prior to obtaining EIC.</p>	AEMO is providing a mechanism for customer switching. This mechanism does not determine how retailers should comply with their EIC obligations.
133.	16	Endeavour Energy	We are supportive of allowing a customer with a smart meter to retrospectively transfer within the last 15 business days provided that AEMO adopts the earlier suggestion that the current FRMP be obligated to maintain the 'Last Bill Date'. Otherwise we believe that there could be inadvertent market complexities and reduced customer experience if the transfer did not occur on the customer's last bill date.	AEMO notes respondent's comment and refer to the response in Table 3 item 131.
134.	16	EnergyAustralia	<p>Yes, it should be limited to manually read meters, as smart meters can easily provide a final accurate reading.</p> <p>Further, retrospective transfers would require the winning retailer to bill the customer from the day after their last bill with their old retailer. This date might be before the customer signed up to the new retailer's plan and therefore might not be in line with customer expectations. This is a further reason to limit the application of retrospective transfers on recent meter reads to manually read meters.</p>	AEMO notes respondent's comment and refer to the response in Table 3 item 131.
135.	16	Energy Consumers Australia	Most importantly, this would allow a consumer to access the new, presumably better, retail offer even earlier. This significant benefit should be available to all small consumers and we suggest that AEMO considers allowing all consumers, not just those with a type 5 or 6 meter, to transfer retrospectively.	AEMO notes the respondent's support for the proposed change.
136.	16	Energy Queensland	The retrospective date limit should be unrelated to meter type. Remotely-read interval meters providing daily data mean that retrospective churns are almost guaranteed. Removing this distinction will also simplify the process and customer communication.	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
137.	16	Evoenergy	There should be no restrictions based on meter type, thus simplifying the transfer process.	AEMO notes the respondent's support for the proposed change.
138.	16	IntelliHUB Group	No. Smart Metering installation should be included but this seems to have been catered for with the extension to 15 business days retrospectivity for the 1040 thus aligning it to the 1000	AEMO notes the respondent's support for the proposed change.
139.	16	MEA Powershop	<p>Powershop believes that the intent of the change to facilitate retrospective transfers is to improve the switching experience for customers, who do not have a remote read capable meter. Powershop does not believe that retrospective transfers should become the industry standard.</p> <p>Where a customer has a remote read capable meter, it is likely that they have been billed up until the switch date. This means if the winning retailer was to submit a retrospective CR for 15 business days prior, the bill would need to be reversed. This creates unnecessary customer confusion and additional work for the losing retailer. Customers do not expect to be transferred retrospectively and with daily readings available, there is no apparent benefit to transfer retrospectively.</p>	AEMO notes respondent's comment and refer to the response in Table 3 item 131.
140.	16	Origin Energy	<p>Origins views that 'retrospective' billing is relevant to both manually read and smart meters. However, smart meters (with comms) should have a retrospective period of no earlier than the day of the read (today's date would be considered retrospective).</p> <p>This is given these meters have specific billing cycles based on monthly reads. Customers may be billed on the 10th of each month for the preceding 30 days. If a customer is billed on an actual and then a new retailer retrospectively transfers them for a date for which an invoice has been issued, then the customer will be confused and inconvenienced with a cancel-rebill scenario for actual consumption. There is also the added complication that the customer may have paid an invoice. While "retrospectivity" could apply to smart meters, it needs to be limited to the day of the read.</p> <p>Origin also seek clarification from AEMO around the customer provided reads. What is the proposed method of providing a customer read when the Retailer is not the FRMP?</p>	AEMO notes respondent's comment and refer to the response in Table 3 item 131.
141.	16	PLUS ES	PLUS ES has no issue with retailers and customers using the benefit of Smart Metering.	AEMO notes the respondent's support for the proposed change.
142.	16	Public Interest Advocacy Centre	No, smart metering systems should also have access to recent reads.	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
143.	16	Red Energy / Lumo Energy	<p>Red and Lumo believe that there is no reason that a retrospective customer transfer should be limited to customers with a manually read interval meter. We believe that this transfer process correctly set up with the adequate information published in the market as a new field in the NMI discovery should be available to customers with both a basic and interval meter. We believe that while limiting this option may assist in encouraging customers in taking up smart meters it would disadvantage a large group of existing consumers who still have basic meters and would create a duplication of processes based on meter type that would need to be managed.</p> <p>Please also refer to Red and Lumo's commentary above on Nomination of multiple roles alongside change of Financially Responsible Market Participant (FRMP).</p>	AEMO notes the respondent's support for the proposed change and refer to response to Table 1 item 17 in regard to Nomination of multiple roles alongside change of Financially Responsible Market Participant (FRMP).
144.	16	Simply Energy	<p>The intent to utilise last read is more relevant to manually read meters as it provides an option to obtain a more accurate read however this principle is irrelevant for remotely read meters.</p> <p>As a result, Simply Energy considers the use of retrospectivity should be as follows:</p> <ul style="list-style-type: none"> for VIC AMI and COMMS meters (except 4A) – retrospectivity allowed for today onwards, i.e. 0 days to +65 business days. For COMMS4A, type 5 and type 6 – retrospectivity allowed for up to 10 business days in the past, i.e. -10 to +65 business days. <p>While there could be value in aligning the read dates of the losing and winning retailers, if it can be provided by the customer, this may not be available at all times, leading to the risk of overlapping bills, especially if a winning retailer decides to raise a transfer from the farthest past date available.</p> <p>As mentioned in the response to Q13, Simply Energy suggests that retrospectivity should be restricted to 0 days where an actual read is always available, to minimise the risk of overlapping bills and their consequences, including reissued bills, customer credits and refunds, and additional customer correspondence.</p>	AEMO notes respondent's comment and refer to the response in Table 3 item 131.
145.	16	Tango Energy	What is the process of alerting the Prospective FRMP if the date provided by the customer and used for the transfer is outside the fifteen business day limit?	AEMO will validate that it is within the specified time limit.
146.	16	TasNetworks	TasNetworks is not aware of any technical reason why an interval metered NMI cannot transfer on any day within the allowed retrospective limit. We consider that customers having meters with these capabilities should be allowed to take advantage of them.	AEMO notes the respondent's support for the proposed change.
147.	16	Vector Metering	Yes. The reforms are about faster switching for customers. For customer already with a remotely read meter they already enjoy faster switching. Allow retrospective switching to a previous date should only be an option where no actual read is available. Why should a prospective retailer be able to transfer a customer to a time before they engaged with them?	AEMO notes respondent's comment and refer to the response in Table 3 item 131.

Table 4 Issues Paper - Transfer of the FRMP role at connection points within embedded networks

No.	Question	Consulted person	Issue	AEMO response
Has AEMO overlooked any requirement or reasonable justification for the retention of the five embedded network-specific CRs?				
1.	17	AGL Energy	<p>AGL does not support removing the five specific CRs relating to transferring the FRMP role for connection points within embedded networks. AGL appreciates AEMO's view that the current five embedded networks specific CRs is very low and the standard CR 1000 series can be used for customer switching. However, in our view, removal of these CRs would entail operational system costs to retailers that are not justified on the basis of any customer benefit.</p> <p>We also note that the AEMC's recently concluded market review on <i>Updating the regulatory frameworks for embedded networks</i> is yet to be implemented.³ In our view, it is yet to be determined whether the CRs codes relating to embedded networks may serve a particular purpose in the context of the anticipated embedded network reforms. We would therefore recommend that any changes be consider at a later date once there is greater clarity of the Embedded Network regulatory changes.</p> <p>³ See AEMC, Updating the regulatory frameworks for embedded networks https://www.aemc.gov.au/market-reviews-advice/updating-regulatory-frameworks-embedded-networks.</p>	AEMO notes that removing the child transfer CRCs and enabling embedded network customers to transfer as per non-embedded network customers aligns the two types of customers and provides the intent of the embedded network reforms through the customer switching review. AEMO consider there is a reasonable degree of confidence in the rule requirements for Embedded Networks due to the information already published by the AEMC.
2.	17	Ausgrid	No Comment.	AEMO notes respondent's comment.
3.	17	AusNet Services	No response provided	AEMO notes respondent's comment.
4.	17	Australian Energy Council	No position.	AEMO notes respondent's comment.
5.	17	Endeavour Energy	No comment	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
6.	17	EnergyAustralia	<p>We have not identified any unintended effects with not retaining the embedded network change requests and moving embedded network NMIs to the CR1000 series. The embedded network CRs and CR1000 basically reflect each other so there should be no issue.</p> <p>This change could also reduce confusion among market participants and result in children connection points being treated the same as other contestably metered market connection points. This would potentially align with the objective of the AEMC's recent final decision on updating regulatory frameworks for embedded networks (https://www.aemc.gov.au/market-reviews-advice/updates/updates-regulatory-frameworks-embedded-networks)</p> <p>However, while we see these changes as beneficial, we suggest the better approach would be to defer making these changes now and consider these changes as a package with the many other changes to MSATS that will need to occur to support the AEMC's final decision.</p>	AEMO notes the respondent's support for the proposed change and refer to Table 4 item 1.
7.	17	Energy Queensland	No. It has always been unclear why these needed to be separated, so removing them is supported.	AEMO notes the respondent's support for the proposed change.
8.	17	Evoenergy	No comment	AEMO notes respondent's comment.
9.	17	IntelliHUB Group	No. These are not required	AEMO notes the respondent's support for the proposed change.
10.	17	Momentum Energy	AEMO has identified specific CRs 1080, 1081, 1082, and 1083 that are used for embedded network customer transfers, that appear to be duplications of the five main CR types used for FRMP transfers, at non embedded network connection points. Momentum believes that they should remain in place as they distinguish child sites from parents and any benefits achieved from removing them would be negligible. If they are removed testing needs to be undertaken to ensure that changes have not interfered with any other processes or the history of relevant transfers.	AEMO notes that child NMIs are identifiable through the EN parent and child codes and the transaction history will still be available at the NMI level.
11.	17	Origin Energy	The use of the embedded network codes is very low and it does not seem necessary to have separate CR Codes for embedded network customers.	AEMO notes the respondent's support for the proposed change.
12.	17	Red Energy / Lumo Energy	Red and Lumo have no comment on this change.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
13.	17	Simply Energy	Aligned Simply Energy is indifferent to decisions made with respect to these CRs (CR 1080 to CR 1084).	AEMO notes the respondent's support for the proposed change.
14.	17	Tango Energy	Are there issues associated with 5MS/GS? The LR for a 10xx CR does not receive any status notifications nor can they object to the transfer. However, as the ENLR Objections can be raised i.e. NOTAPRD. In the marked up version of the MSATS CATS Procedures provided, the ENLR receives only the Completed status notification. This was commented on in the response to the Consultation on 5MS Metering Package 2 such that all status notifications are to be received by the ENLR.	AEMO notes there are no issues associated with 5MS/GS from the removal of the five embedded network-specific CRs. The FRMP for the parent NMI is the child ENLR and an ENLR cannot object in a FRMP change.
15.	17	TasNetworks	TasNetworks is not aware of any reason that has been overlooked.	AEMO notes the respondent's support for the proposed change.
16.	17	Vector Metering	No comment.	AEMO notes respondent's comment.

Table 5 Issues Paper - Facilitating cooling-off reversal of a FRMP change

No.	Question	Consulted person	Issue	AEMO response
Do the changes adequately provide for retailers to comply with the cooling-off provisions and customers' exercising their right to cool-off?				
1.	18	AGL Energy	AGL supports AEMO's proposed changes to better facilitate customers' rights to cool-off, including: <ul style="list-style-type: none"> Removing the current restrictions from the MSATS Procedure, providing retailers with a choice to complete customer switches within or following the completion of the cooling off period as provided for in the NERR and ESC codes; and Amending the current CR1026 (error correction CR – Cooled Off) in order that it performs a reversal of a completed 1000 series. 	AEMO notes the respondent's comment and refers to the submission and assessment discussion in Section 4.7 of the Draft Report.
2.	18	Ausgrid	No Comment.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
3.	18	AusNet Services	No response provided	AEMO notes respondent's comment.
4.	18	ACT Civil and Administrative Tribunal	<p>Cooling off issues also need to be considered. Currently there is a 10 day cooling off period to allow for a customer to change their mind about a transfer. We understand that the cooling off notice is usually recorded. When giving notice of the right to a 10 day cooling off period, retailers should also inform customers about the effect of changing retailers on existing debt, as discussed above.</p> <p>At the meeting AEMO advised that it was looking at a method for operationalising the retransfer to original retailer when a customer exercises cooling off rights. Under the current system, the losing retailer may not know which retailer gained the customer's account. If the account is returned to the original retailer by an automated process, it is important that each utility know the identity of the other retailer so that the customer doesn't fall between the two retailers if problems arise during the cooling-off transfer.</p>	AEMO notes that the reversal CRC will only work when certain conditions are met. On completion of the reversal both retailers will be provided with notification allowing both retailers to be informed. In addition, retailers can view who the previous retailer was through requesting a NMI Discovery 3.
5.	18	Australian Energy Council	No position.	AEMO notes respondent's comment.
6.	18	Endeavour Energy	No comment	AEMO notes respondent's comment.
7.	18	EnergyAustralia	Broadly, yes. The changes provide for the winning retailer to complete the cooling-off reversal. They will not be effective if the customer has requested the losing retailer to transfer back the site as per their "cooling off" with the new retailer. Retailers can work around this by training front of house staff to direct customers to the winning retailer.	AEMO notes the respondent's support for the proposed reversal.
8.	18	Energy Consumers Australia	<p>Energy Consumers Australia supports the amendments which would mean that a customer transfer could occur immediately, without in any way compromising the cooling off period. This ensure that the consumer who can benefit directly from choosing a new offer, can still access their consumer rights during this time, which is clearly the intention of the National Energy Retail Rules. Rule 57 of the Rules allows retailers to transfer a customer prior to the completion of the cooling off period, provided the transfer can be reversed if the customer elects to withdraw from the contract.</p> <p>The right to a cooling off period can provide the power for redress for those consumers who are transferred following an unsolicited agreement or a pressurised sales call. However, it should not prevent consumers from being able to access the benefits of a new energy offer as quickly as possible.</p>	AEMO notes the respondent's support for the proposed reversal.



No.	Question	Consulted person	Issue	AEMO response
9.	18	Energy Queensland	Energy Queensland agrees the changes adequately provide for retailers to comply with the cooling off provisions and customers exercising their right to cool-off.	AEMO notes the respondent's support for the proposed reversal.
10.	18	ERM Power	<p>We do not support the proposed system changes to facilitate transfers during the cooling off, which would lead to retailers having to inefficiently raise further transactions to reverse the transfer should the customer wish to not proceed. Put simply, unravelling a transfer with additional transactions and accommodating for this with systems change is inefficient. We do not see any impediments or inefficiencies stemming from the existing approach to compliance with the cooling off provisions now, that would warrant the change. We question whether there will be a net benefit given the financial impact to the customer of moving within the small number of days will be negligible. The costs of the required system changes and operational resources to reverse the transfer is high. Even if a retailer chooses not to utilise a 'cooling off switch', it will need to accommodate these costs for any customers that are lost to retailers that use it. Manual workarounds to these transactions also come at an unsustainable cost. Ultimately these costs will be passed on to all customers.</p> <p>This policy outcome of negating the impact of a lengthy cooling off period, through the bypassing of cooling off rights through the system (unless activated) is unwieldy, risky and costly. Reversing transfers for customers who wishes to cancel during the cooling off period layers in complexity and operational costs with system changes to accommodate new transactions and process additional volumes. These are currently not borne by the outgoing retailer. If AEMO is uncertain of the uptake of a 'cooling off switch' and suggest retailers use manual work around until uptake is material, this does not suggest a compelling drive for the change as benefits are unclear. It is our view AEMO should remove this proposal.</p> <p>We suggest the core issue, the duration of the cooling off period should be explored by policy makers rather than AEMO. The AEMC and regulators should consider the length of cooling off rights for electricity contracts, given small customers are not penalised for contract cancellation (early termination fees) and the 10 day right far exceeds cooling off rights for other transactions with high financial costs, such as car and property purchases.</p>	AEMO notes the respondent's comment and recommends that any concerns with the requirements if the cooling-off period are addressed by the respondent to the appropriate authority. AEMO notes that the AEMC has indicated it will be performing a review of the National Energy Retail Rules established as part of the National Energy Customer Framework in 2020. This might provide an opportunity for a review of cooling-off provisions in the NERR.
11.	18	Evoenergy	Only concern here is expected volumes and what does the retailer do if there was a life support customer also?	AEMO notes respondent's comment and refers to the processes for life support established within the National Energy Retail Rules.



No.	Question	Consulted person	Issue	AEMO response
12.	18	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
13.	18	MEA Powershop	Powershop supports AEMO's design if the AEMC final rule determination clearly outlines a retailer's ability to submit a Change Request during the cooling off period.	AEMO notes the respondent's comment and refers to the submission and assessment discussion in Section 4.7 of the Draft Report.
14.	18	Momentum Energy	Momentum is supportive of the intention to amend CR 1026 (error correction CR – Cooled Off) so that it now may only be raised by the retailer which raised the original and completed 1000 CR series. Formerly this could only be raised by the previous retailer which was problematic and inefficient. This transaction will reverse the transfer and places the obligation on the most appropriate retailer to rectify the situation.	AEMO notes CR1026 has been removed and refers to the submission and assessment discussion in Section 4.7 of the Draft Report. AEMO notes participants can use CR1029 in its place if they have a long term cooling off issue to rectify.
15.	18	Origin Energy	<p>Origin is of the view that the use of CR1025/29 could achieve the same outcome as the CR1060. AEMO's proposal refers to amending CR1026 to allow a winning retailer to reverse the transfer if the customer decides to cancel the transfer.</p> <p>However, the procedures removes CR1026 in its entirety and replaces it with a new CR1060 to allow a transfer reversal to cover cooling off. This requires the build of new CR Codes.</p> <p>This proposal is a shift in both system and process capabilities as the onerous for cancelling a transfer moves from the current retailer to the winning retailer. Systems, process and training will need to be undertaken to ensure that winning retailer (rather than the losing retailer) initiates a cooling reversal if a customer changes their mind.</p>	AEMO notes that there was change between the Issues Paper and the draft CATS Procedure publication. AEMO notes that a CR1060 gives the opportunity for a prospective retailer to raise the cooling off reversal unlike the current process which requires the existing FRMP to raise an error correction on behalf of the prospective retailer. Participants can use CR1029 in its place if they have a long term cooling off issue to rectify.
16.	18	Public Interest Advocacy Centre	Yes	AEMO notes the respondent's support for the proposed reversal.



No.	Question	Consulted person	Issue	AEMO response
17.	18	Simply Energy	<p>Aligned however 10 business days is not warranted (maximum should be 9 business days).</p> <p>While Simply Energy agrees with AEMO's proposed design on cooling off reversals, after carefully assessing the scenario, Simply Energy believes that it should be restricted to 9 business days instead of 10 business days.</p> <p>If a retailer raises a customer transfer on day 0 (the first day of cooling off period), MSATS completes the transfer on day 1 (as an overnight batch) which removes 1 business day from the cooling off period, hence MSATS supporting 10 full business days is not appropriate.</p>	AEMO has nominated the 10 business days to enable full timing flexibility in the reversal CR, however, retailers must meet their cooling off obligations under the National Energy Retail Rules/Victorian Transfer Code.
18.	18	Tango Energy	Yes. The NERR and Vic Electricity Customer transfer Code allow for transfers to be submitted during any applicable cooling off period providing the transfer can be reversed. With the changes proposed it is understood retailer can still submit transfers post the cooling off period.	AEMO notes the respondent's support for the proposed reversal.
19.	18	TasNetworks	TasNetworks considers the ability for retailers to handle cooling off customers is covered adequately by the proposed solution.	AEMO notes the respondent's support for the proposed reversal.
20.	18	Vector Metering	No comment.	AEMO notes respondent's comment.
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?				
21.	19	AGL Energy	See response to question 18.	Refer to response in Table 5 item 1.
22.	19	Ausgrid	No Comment.	AEMO notes respondent's comment.
23.	19	AusNet Services	Yes, we consider the redesign is lower impact solution.	AEMO notes respondent's comment.
24.	19	Australian Energy Council	The AEC supports the proposed approach to redesign the existing error correction CR. We consider that requiring the winning retailer to action the error correction better reflects the principle that the party that caused the issue should rectify it.	AEMO notes the respondent's comment and refers to the submission and assessment discussion in Section 4.7 of the Draft Report.



No.	Question	Consulted person	Issue	AEMO response
25.	19	Endeavour Energy	We support AEMO's proposal to delete CR1026 and the creation of CR1060 for retailer reversal due to the customer exercising their cooling of rights	AEMO notes the respondent's support for the proposed change.
26.	19	EnergyAustralia	Yes.	AEMO notes respondent's comment.
27.	19	Energy Queensland	We agree the redesign of an existing cooled-off error correlation CR is preferable. As stated above, introduction of new CR types adds complexity. Further, given that CR1026 is specifically for this purpose, making it match with the intended rule change is logical.	AEMO notes respondent's comment.
28.	19	Evoenergy	No comment	AEMO notes respondent's comment.
29.	19	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
30.	19	MEA Powershop	Powershop believes that the CRC 2026 is suitable for the error correction. Powershop does not believe that there is a benefit to designing a new CRC for this purpose.	AEMO notes respondent's comment.
31.	19	Origin Energy	Origin raises whether CR1025/29 could achieve the same outcome as it could cover cooling-off.	AEMO notes that CR1029 can be used when a participant misses the time window for the cooling off reversal.
32.	19	PLUS ES	PLUS ES supports the utilisation of the existing CR1026 for cooled-off error corrections.	AEMO notes respondent's comment.
33.	19	Red Energy / Lumo Energy	Red and Lumo support the redesign of the cooled-off error correction CR to the creation of a new error correction CR. Red and Lumo believe that the existing CR with some amendments will achieve the desired outcome.	AEMO notes respondent's comment.
34.	19	Simply Energy	Simply Energy believes that CR1026 will remain a useful transaction and should be retained as is. CR1026 provides similar functionality to the new CR1061, but can only be raised by the winning retailer, whereas the proposed cooling-off reversal is to be raised by the losing retailer. Having both CR1026 and CR1061 will enable differentiation between the 2 situations.	AEMO notes respondent's comment and refer to response in Table 5 item 15.
35.	19	Tango Energy	Yes. The use of CR1026 to revert the NMI to the previous retailer is preferred.	AEMO notes the respondent's comment and refers to the submission and assessment



No.	Question	Consulted person	Issue	AEMO response
				discussion in Section 4.7 of the Draft Report.
36.	19	TasNetworks	TasNetworks considers that it would be preferable to re-design one of the existing CRs as opposed to creating a new CR. This would aid participants in keeping development costs down and quite possibly simplify the implementation process, which could be significant given the relatively tight timeframe and other concurrent market change projects.	AEMO notes the respondent's comment and refers to the submission and assessment discussion in Section 4.7 of the Draft Report.
37.	19	Vector Metering	No comment.	AEMO notes respondent's comment.

Table 6 Issues Paper - Changes to error correction 1000 series CRs

No.	Question	Consulted person	Issue	AEMO response
What problems, if any, might be caused by the removal of the error correction CRCs 1022, 1027 and 1028?				
1.	20	AGL Energy	While we appreciate AEMO's view that a number of error correction codes are rarely used and are designed to support a very specific set of circumstances that might otherwise reasonably be covered by another existing error correction CRC, we do not support the removal of these code at this point in time. Removal of these CRs would entail operational system costs to retailers that are not justified based on any customer benefit. We also note that removal of error correction codes could be considered at a later date, once the anticipated embedded networks reforms are implemented.	AEMO notes that part of the customer switching changes is to deliver simplification and future proofed processes. Eliminating the need for many error corrections codes for minor and rare cases removes confusion from the use of CRCs. Overall, the CRC 1029 can be used for many scenarios. AEMO acknowledges the embedded network reforms, however, notes the potential changes should not impact



No.	Question	Consulted person	Issue	AEMO response
				procedural transactions for customer switching.
2.	20	Ausgrid	No Comment.	AEMO notes respondent's comment.
3.	20	AusNet Services	No response provided	AEMO notes respondent's comment.
4.	20	Australian Energy Council	No position.	AEMO notes respondent's comment.
5.	20	Endeavour Energy	We support the removal of CR1022, CR1027 and CR1028 as this will remove CRs that are rarely used. We note that AEMO identified these three CRs were collectively used less than 25 times in 2018.	AEMO notes the respondent's support for the proposed change.
6.	20	EnergyAustralia	No comment.	AEMO notes respondent's comment.
7.	20	Energy Queensland	Energy Queensland has not identified any problems which may arise from the removal of these CRCs. Considering the amount these CRs are utilised, we agree that their removal seems reasonable.	AEMO notes the respondent's support for the proposed change.
8.	20	Evoenergy	No problems identified at present.	AEMO notes the respondent's support for the proposed change.
9.	20	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
10.	20	MEA Powershop	Powershop does not foresee any problems with the removal of the three CRC's above.	AEMO notes the respondent's support for the proposed change.
11.	20	Momentum Energy	We note AEMO's intention to remove some rarely used CRCs 1022, 1027 and 1028 that may be substituted with other existing error correction CRSs. While we agree in principle of this general tidy up of the procedures our concern is that it may create more work and testing to remove them than perhaps to simply signal a future sunset date from which they are not to be used. This would have less impact for any inflight transactions of these types and could allow new entrants to ignore them for their system build certification.	AEMO notes that part of the customer switching changes is to deliver simplification and future proofed processes. Eliminating the need for many error corrections codes for



No.	Question	Consulted person	Issue	AEMO response
				minor and rare cases removes confusion from the use of CRCs. Overall, the CRC 1029 can be used for many scenarios. AEMO does not intend to provide for a sunset period with this change.
12.	20	Origin Energy	Origin seeks clarification that CR1025/29 will be used in place of the removed CR's.	AEMO confirms that CR1029 can be used in the place of the removed error corrections CRCs.
13.	20	Red Energy / Lumo Energy	Red and Lumo support the proposal put forward by AEMO to amend the existing retrospective transfers to facilitate the new customer transfer options as well as remove the transfers codes proposed. Red and Lumo do not foresee any issues with the proposed removal of these CRs and believe that the proposed cooled-off error correction CR will be beneficial for both consumers and market participants.	AEMO notes the respondent's support for the proposed change.
14.	20	Simply Energy	Aligned Although low in volume, if the existing error correction CRs 1022, 1027 and 1028 are not causing any issues to current processes, their deletion is not desired. Moreover, the intent of the change is to expedite customer transfers, which does not impact these CRCs.	AEMO notes the respondent's support for the proposed change.
15.	20	Tango Energy	If it is possible for the MDP to provide an incorrect Actual Change Date then CR1022 should remain. If the Prospective Retailer cannot submit the CR1026 to 'return' the NMI to the Current Retailer within the required timeframe, then CR1027 will need to remain to advise of the reason for the transfer It is expected the circumstance that triggers CR1028 will continue to exist; therefore the CR should be retained.	The volume of current and future error corrections for an incorrect Actual Change Date doesn't justify the retaining the CR1022. MDP involvement will reduce to a smaller volume because MDPs will only receive a CR1500 for SP transfer CRCs. For read types RR, PR – MDPs will provide read data after transfer completes. AEMO notes that CR1029 can be used in the place of the



No.	Question	Consulted person	Issue	AEMO response
				removed error corrections CRCs.
16.	20	TasNetworks	TasNetworks considers that any scenarios requiring error correction can be covered by the remaining 102X CRs.	AEMO notes the respondent's support for the proposed change.
17.	20	Vector Metering	Vector Metering notes that these CR's were used on 25 occasions in 2018. Perhaps it would be prudent for AEMO to survey these participants to understand the scenarios that these were used under and determine if there are other transactions that could be used instead?	AEMO notes that feedback provided in the submissions to this consultation are the survey of participants to understand the usage of these CRCs.
Should changes be considered to error correction CRCs 1020, 1021, 1023 and 1029 to better facilitate resolution of issues and errors for customer switching?				
18.	21	Ausgrid	No Comment.	AEMO notes respondent's comment.
19.	21	AusNet Services	No, we consider these changes would be unnecessary and add further costs.	AEMO notes respondent's comment.
20.	21	Australian Energy Council	No position.	AEMO notes respondent's comment.
21.	21	Endeavour Energy	We suggest that CR1021 be removed. We note that the intent of having different error correction codes is to monitor what is causing the need to perform error corrections. With the proposed changes there will a large reduction for the need of a CR1500, and with our suggestion for a new objection code (see below for our feedback on clause 4.7) we believe that this will provide better information on whether the issue is because a CR1500 was missed or for another reason.	AEMO acknowledges the suggested change and has removed the CR1021. AEMO notes that CR1029 can be used in the place of the removed error corrections CRCs.
22.	21	EnergyAustralia	Yes, changes should be made to streamline the process. The current process of error correction causes delays and dissatisfaction for customers.	AEMO notes the respondent's support for the proposed change.
23.	21	Energy Queensland	Energy Queensland supports the retention of these CRs.	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
24.	21	Evoenergy	No comment	AEMO notes respondent's comment.
25.	21	IntelliHUB Group	No comment.	AEMO notes respondent's comment.
26.	21	MEA Powershop	Powershop supports retaining these CRC's. Powershop uses CRC's 1020 and 1023 regularly, therefore we suggest that AEMO do not alter the functionality of these CRC's.	AEMO notes the respondent's support for the proposed change.
27.	21	Origin Energy	No comment	AEMO notes respondent's comment.
28.	21	PLUS ES	PLUS ES recommends changing the Objection Period for these transactions to 0 Days. PLUS ES agrees that all parties should have the ability to Object to Transactions that change any participant roles.	AEMO notes we are removing certain error corrections but we do not intend to change the process for the error corrections that will be retained as AEMO intends that the error correction will fix any issues that arise and objections help identify these issues. The intent is to deliver the customer outcome. We are not aware of and have not considered as part of this change whether there are significant delays as a result of these objections. As a result we have not included a change to the objections in our proposal.
29.	21	Red Energy / Lumo Energy	Red and Lumo do not see any reason to amend these retrospective CRs as these already provide a range of existing functions in the market.	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
30.	21	Simply Energy	Simply Energy agrees with AEMO that CRCs mentioned in this section have an ongoing value and do not require alteration.	AEMO notes the respondent's support for the proposed change.
31.	21	Tango Energy	The original intent of the error corrections was to provide transparency as to the reason for the need to 'win back' the NMI.	We provided an assessment in the issues paper that supported our suggested removal. Error corrections can be expanded in the future if there is a rationale to do so. The errors that have been proposed to removed have low volumes, and this tells us that the intent of the CRs is not used in practice.
32.	21	TasNetworks	TasNetworks considers the remaining transactions should adequately cover most if not all scenarios requiring error correction.	AEMO notes the respondent's support for the proposed change.
33.	21	Vector Metering	No comment.	AEMO notes respondent's comment.

Table 7 Issues Paper - MC appointment objections (6000 series CRs)

No.	Question	Consulted person	Issue	AEMO response
Are the changes proposed to the objection codes available to MCs regarding MC role appointment reasonable?				
1.	22	AGL Energy	<p>AGL supports AEMO's proposal to amend the use of objection codes for the appointment of MC such that the Initial MC may only use the objection code of DECLINED where:</p> <ul style="list-style-type: none"> The connection point to which it is proposed to be appointed has a metering installation which is other than a type 5 or 6 metering installation; or The MP and MDP roles at the connection point have been altered to parties other than the DNSP's MP and MDP; or 	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
			<ul style="list-style-type: none"> The Initial MC has previously raised a notice of a metering installation malfunction as provided for in clause 11.86.7 of the NER. <p>AGL agrees with AEMO that this change will help to resolve the issue of a retailer and competitive MC being left in a state of limbo in terms of the provision of MC services at the metering installation, when an initial MC determines to object using a reason of DECLINED.</p>	
2.	22	Ausgrid	Agree	AEMO notes the respondent's support for the proposed change.
3.	22	AusNet Services	<p>AusNet Services does not agree with the proposed removal of objection codes. The majority of AusNet Services sites have Vic AMI meters. In Victoria, electricity law does not permit small customers to move to Type 4 metering. By removing these objections from the 6000 series CR transactions, MSATS would not allow Victorian DNSPs to object to transactions that contravene electricity law. This would be an appalling outcome for customers.</p> <p>Often retailers with operations based mostly outside Victoria make the innocent mistake of appointing a contestable metering coordinator. If the metering coordinator replaces the meter for a small customer using less than 160 MWhr/year, we are required to restore AMI metering. The contestable MC losses their investment and the customer are left confused.</p> <p>Today, we can avoid this from happening by objecting to changes for small customers, and where a retailer wants to put Type 4 metering on say a new bakery all they have to do send us a request to classify the site as large and tell us why (e.g. new bakery). However, the proposed changes do not allow this to occur.</p>	<p>AEMO notes that the proposed changes are not applicable to VICAMI.</p> <p>This is an existing obligation, and the proposed change is outside the scope of this consultation. AusNet Services may wish to submit an ICF to facilitate further consideration of this change.</p>
4.	22	Australian Energy Council	No position.	AEMO notes respondent's comment.
5.	22	Endeavour Energy	<p>We agree that a MC should have the right to object, however we note that AEMO is looking to define the scenarios when an Initial MC can object using the DECLINE code. AEMO provided an example where a retailer genuinely made a mistake and wants to revert the MC role back to the Initial MC. We agree with the example provided that the Initial MC should allow the MC reversion to occur.</p> <p>However we believe that AEMO's proposed change is unnecessary because the volume we have experienced is low (1 or 2 per month) and we have worked with retailers and other MCs to allow the reversion of MC role where appropriate, like the example AEMO provided. Therefore we do not see this as a significant issue that warrants the proposed change which would require costly system</p>	<p>AEMO notes for scenario 1 with a Greenfield NMI an objection of NOTRESP can be used.</p> <p>For scenario 2, the proposed change is for a future event, not a current event associated with the transfer timeframe, and the role of MC should change in the future. As the site</p>



No.	Question	Consulted person	Issue	AEMO response
			<p>changes. We suggest an obligation to not unreasonably withdraw an objection when requested would be more appropriate (this could be placed in section 2.6 of the CATS Procedure).</p> <p>If AEMO wants to define scenarios when an Initial MC is allowed to raise an objection then we suggest the following be added as allowable objection scenarios:</p> <ol style="list-style-type: none"> 1. When the Initial MC is nominated for a greenfield NMI 2. When the Initial MC is aware that the type 5 or 6 metering installation needs to be changed to a type 4 metering installation 3. When the Initial MC did not approve the installation or alteration made to a type 5 or 6 metering installation <p>Below is an explanation for the above scenarios:</p> <ol style="list-style-type: none"> 1. All greenfield NMI must have a type 4 metering installation, therefore it is not appropriate for an Initial MC to be the MC for a greenfield NMI 2. Example includes solar installed or the service upgraded from single to multi phases, whereby the existing metering installation needs to be upgraded 3. Example includes a type 6 meter removed from one metering installation and installed at another metering installation <p>Regardless of what scenario is defined to be an allowable reason for an Initial MC to raise an objection, it should be made clear that any retailer wishing to nominate an Initial MC should obtain their prior agreement before raising the change request. This would allow the Initial MC to understand the scenario and time to confirm if any of the allowable objection scenarios apply.</p>	<p>currently has Type 5 or 6 metering at site, the Initial MC is still the appropriate MC.</p> <p>For scenario 3, the example provided is a breach of the rules, not a matter for MSATS transactions/objections. This should be a reported compliance issue to AER or appropriate jurisdictional bodies.</p>
6.	22	EnergyAustralia	<p>EnergyAustralia agrees with the proposed changes. However, we request AEMO consider whether an MC should be able to object due to a previously raised notice of metering installation malfunction (MFIN).</p> <p>Currently there are numerous instances of transfers being delayed due to MFIN at the site, this appears to contradict the customer's desire and the intent of the Power of Choice reforms to promote the proactive roll-out of type 4 metering.</p> <p>If a retailer wants to appoint an MC for a site that has an MFIN, this should be undertaken with the understanding that there is a metering issue that needs to be rectified and the emphasis to have this occur in a faster timeframe than the previous MC had agreed to.</p>	AEMO notes the respondent's support for the proposed change.
7.	22	Energy Queensland	We agree that these changes are reasonable.	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
			We also note that the use of MFN messages is not consistent and is often in error. As such we suggest that this particular item be a guideline and not an absolute requirement as there are times when the existence of an MFN should not restrict this change.	
8.	22	Evoenergy	No comment	AEMO notes respondent's comment.
9.	22	IntelliHUB Group	<p>Not really. Contestable MC's need to be able to object to erroneous MC nominations and we have a system which allows us to do this as we have based our objection logic on the CATS rules. Changes to this CATS rules logic will mean changes to our system logic.</p> <p>For initial MC nominations IntelliHUB are not sure any changes are required here. It seems initial MC's are declining correctly in most circumstances.</p>	We're not proposing to make changes that affect the contestable MC. Changes are reflecting practice for Initial MCs on the basis that IntelliHUB's comments are accurate about Initial MC objection behaviour.
10.	22	MEA Powershop	Powershop believes that the proposed changes to the objection codes are reasonable.	AEMO notes the respondent's support for the proposed change.
11.	22	Momentum Energy	Momentum supports the approaches proposed by AEMO under this topic.	AEMO notes the respondent's support for the proposed change.
12.	22	Origin Energy	It appears reasonable that the initial MC should not DECLINE to be MC for sites where there is an error correction required.	AEMO notes the respondent's support for the proposed change.
13.	22	PLUS ES	<p>PLUS ES supports the proposed objection code changes available to an MC.</p> <p>PLUS ES also reiterates that MCs should have the ability to object to a prospective/retrospective appointment.</p> <p>In most scenarios, the MC objection would be due to a valid commercial/contractual agreement. i.e. a Direct Metering agreement with the customer, where the incoming retailer may have no knowledge of nor should they.</p> <p>Whilst there are transactions to enable a retrospective correction, the MC is dependent on the FRMP to receive and action the request. Hence, the most efficient mechanism is to be able to object to the nomination itself.</p>	AEMO notes the respondent's support for the proposed change and refer to responses in Table 1 items 18 and 32.



No.	Question	Consulted person	Issue	AEMO response
14.	22	Red Energy / Lumo Energy	<p>Red and Lumo do not support AEMO amending the current procedures to remove the ability to nominate multiple participant roles in the market transfer nor the ability for MCs to object to the nomination and do not believe that the potential benefits outweigh the likely costs. Red and Lumo have expanded on our concerns with this proposed change and the impact on systems as well as the wider costs below.</p> <p>Please also refer to Red and Lumo's commentary above on Nomination of multiple roles alongside change of Financially Responsible Market Participant (FRMP).</p>	Refer to response to Table 1 item 17 in regard to Nomination of multiple roles alongside change of Financially Responsible Market Participant (FRMP).
15.	22	Simply Energy	<p>MCs should only be allowed to object on 'explicit' appointments via CR 6000 series and the differences between CR 1000 series and CR 6000 series in case of MC objections (or MDP MPB objections) need to be addressed.</p> <p>Specifically, Simply Energy agrees with AEMO's preferred position that initial MCs should be restricted to object CR 6000 series under the three scenarios as mentioned in the issues paper. Currently, there is no such restriction and it results in unnecessary objections by initial MCs, even if the aim is to correct an erroneous appointment. Simply Energy believes that by specifying the reasons, MC objections would be more relevant and suitable to meet the needs of the future.</p>	AEMO notes the respondent's support for the proposed change.
16.	22	Tango Energy	<p>Under the AEMO proposal, there is now a two stage process. The change of role – Retailer and the Change of role - MC. This will impact retail processes, systems and costs in order to ensure the submission of the change of MC once the change of FRMP is Completed.</p> <p>It is assumed a Change of role – MC will always be required even if the retailer intends to use the services of the incumbent MC or appoint a new MC.</p> <p>The objection of CONTRACT and DECLINED should still be applicable in instances where the MC or FRMP nominates the incorrect MC.</p>	AEMO notes respondent's comment and refer to response in Table 1 item 18.
17.	22	TasNetworks	TasNetworks considers that the proposed new objection rules are adequate for the MC appointment CRs. Any scenario not covered for should be able to be resolved by communication with the FRMP.	AEMO notes the respondent's support for the proposed change.
18.	22	Vector Metering	Yes	AEMO notes the respondent's support for the proposed change.
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?				



No.	Question	Consulted person	Issue	AEMO response
19.	23	Ausgrid	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.	AEMO notes respondent's comment and refer to response in Table 7 item 5.
20.	23	AusNet Services	No response provided	AEMO notes respondent's comment.
21.	23	Australian Energy Council	No position.	AEMO notes respondent's comment.
22.	23	Endeavour Energy	See our response to question 22	Refer to response to Table 7 item 5.
23.	23	EnergyAustralia	No comment.	AEMO notes respondent's comment.
24.	23	Energy Queensland	Energy Queensland offers no comment.	AEMO notes respondent's comment.
25.	23	Evoenergy	No unreasonable restrictions.	AEMO notes respondent's comment.
26.	23	IntelliHUB Group	Allow MC's to raise role corrections for Small sites or 6301's. Currently MC's can only raise 63XX's for Large classified sites in MSATS as per the CATS rules.	AEMO notes that that the proposed changes are outside the scope of this consultation. IntelliHUB Group may wish to submit an ICF to facilitate further consideration of this change.
27.	23	Origin Energy	The LNSP may have sent an MFIN to the previous retailer and not re-issued the fault notification to the current retailer. Hence, for avoidance of doubt, the 3rd condition should be amended as follows: "The Initial MC has previously raised a notice of a metering installation malfunction, to the Retailer reinstating the initial MC, as provided for in clause 11.86.7 of the NER."	AEMO notes respondent's comment and consider the proposal by AEMO includes reasonable opportunity for the Initial MC to object where they have previously raised a notice of a MFN.



No.	Question	Consulted person	Issue	AEMO response
28.	23	Red Energy / Lumo Energy	See response to question 22.	Refer to response to Table 7 item 14.
29.	23	Simply Energy	Simply Energy is fairly aligned with AEMO's proposals. Additionally, there is one scenario that is not addressed in the current or proposed MSATS procedures. This is the scenario where a retailer wins a site with a DNSP meter and a contestable MC. There are three ways this situation could arise (receipt of a fault notification, customer initiated meter churn (such as a solar upgrade) or as a retailer led roll out) and the actions required of the winning retailer are different in each case. Simply Energy recommends that a flag is added to MSATS to indicate which of these situations applies.	AEMO notes that that the proposed changes are outside the scope of this consultation. Simply Energy may wish to submit an ICF to facilitate further consideration of this change.
30.	23	Tango Energy	The NER requires the FRMP to appoint the MC who in turn appoints the MDP and MPB. With the proposed changes the FRMP role can change but there may be a delay to the appointment of the MC if there is an Objection lodged and so subsequent delays to the appointment of the MDP and MPB. The FRMP is then in a position of not having access to metering data as they have no relationship with the current MC. How does the current proposal resolve this market issue which has existed for some time?	Responsibility for appointment is clearly stated in the NER and nomination through AEMO Procedures. Presence or lack of a contract or other agreement between the FRMP and the MC is irrelevant in this context.
31.	23	TasNetworks	TasNetworks does not consider there are any restrictions that need to be considered.	AEMO notes respondent's comment.
32.	23	Vector Metering	Yes. Vector Metering believes there has been no case presented to remove the ability for the MC to nominated in the CR100x series. Current functionality allows the retailer to nominate the MC role in a single transaction. The role change is complete in the market in concert with the FRMP change. The proposed removal of this functionality in the CR100x series would result in the retailer having to wait until the customer transfer is completed then nominate the new MC role with a subsequent MC change transaction incurring a further objection period. This is inefficient and not required.	AEMO notes respondent's comment and refer to response in Table 1 item 18.
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?				
33.	24	Ausgrid	No Comment.	AEMO notes respondent's comment.
34.	24	AusNet Services	AusNet Services is not aware of any issues that could be resolved by reducing the nominated MC's objection timeframe to zero days in MSATS.	AEMO notes respondent's comment.
35.	24	Australian Energy Council	No position.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
36.	24	CitiPower Powercor	CitiPower Powercor support the 1 day period being retained. It gives enough time to deal with any issues.	AEMO notes respondent's comment.
37.	24	Endeavour Energy	<p>We believe that MCs should have the right to object, which could be for reasons such as the MC does not have a contract with the retailer or the MC should not be the MC due to the metering installation type.</p> <p>In addition, MCs should also be given an appropriate time to exercise their right to object. We believe that a zero day objection period is insufficient because this could range from 24 hours to minutes just before midnight for the MC to process, validate and if necessary raise an objection. Should a MC not receive sufficient time to raise an objection then this would lead to the MC having to arrange for a retrospective correction, which would be more complex and time consuming, especially given that the impacted MC does not have the ability to fix the issue themselves and must rely on other parties instead.</p> <p>Note that we have suggested alternative options under question 1 that looks to address the issue AEMO wants to resolve without reducing the MC's right to object.</p>	AEMO notes respondent's comment.
38.	24	EnergyAustralia	No comment.	AEMO notes respondent's comment.
39.	24	Energy Queensland	<p>We suggest that reducing the objection timeframe will benefit the installation of metering. However, this alone will not resolve the installation of metering as there are other factors that contribute to this issue.</p> <p>We also note that urgent transactions are often complicated by the enforced delay period of objection.</p>	AEMO notes respondent's comment.
40.	24	Evoenergy	No issues come to note.	AEMO notes respondent's comment.
41.	24	IntelliHUB Group	No. MCs need to be able to object/decline for incorrect role nomination. A one day objection period is required for erroneous MC nominations and for large sites that have DMA's. The MC's wears all the risk and a one day objection period is not unreasonable. MC's may not have contractual arrangements in place with all FRMP's and a 1 day objection window allows for management of these scenarios.	AEMO notes respondent's comment.
42.	24	Origin Energy	No comment	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
43.	24	PLUS ES	<p>PLUS ES supports the removal of the objection period from the MC nomination, as the metering installation (planning/deployment) would gain this day in the available timeframe.</p> <p>Furthermore, PLUS ES would support the objection period being removed from all CR6XXX transactions as this ultimately would allow the MC/MPB to recover 2 additional business days from the current process of nominating an MC and then the MPB/MDP.</p> <p>Zero objection days does not mean that you cannot object. The objection just needs to occur on the same day the CR is requested.</p>	AEMO notes respondent's comment and that that the proposed changes to the full suite of CR6XXX are outside the scope of this consultation. PLUS ES may wish to submit an ICF to facilitate further consideration of this change.
44.	24	SA Power Networks	We do not support the zero days objection timeframe and do not believe that changing of the timeframe will result in improvements to the installation of metering.	AEMO notes respondent's comment.
45.	24	Red Energy / Lumo Energy	See response to question 22.	Refer to response in Table 7 item 14.
46.	24	Simply Energy	<p>Response to questions 24 and 25:</p> <p>Simply Energy agrees with AEMO's preferred position that reducing MCs objection period from 1 business day to 0 business day will not make any material difference, assuming most of the objections are raised automatically and instantly. Hence the outcome of reduced objection period will be the same as unchanged objection period.</p> <p>While Simply Energy believes that it's important to address the difference between CR 1000 series and CR 6000 series in case of MC objections (or MDP/MPB objections), Simply Energy reiterates that MCs should only be allowed to object on 'explicit' appointments via CR 6000 series.</p>	AEMO notes the respondent's support for the proposed change.
47.	24	Tango Energy	No. I would expect MCs would only install metering once they were appointed by the FRMP. It is unlikely the MC will provide services to a FRMP with whom they have no contractual relationship.	AEMO notes respondent's comment.
48.	24	TasNetworks	There is one benefit that TasNetworks is aware of, being a potential for the customer to have one less day's delay before having new metering installed, by the new MC being able to engage with the MP a day earlier.	AEMO notes respondent's comment.
49.	24	United Energy	United Energy support the 1 day period being retained. It gives enough time to deal with any issues.	AEMO notes the respondent's support for the proposed change.
50.	24	Vector Metering	No.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
Would MCs reasonably be capable of determining whether to object to transfers if the objection period for MC nomination was reduced to zero days?				
51.	25	Ausgrid	No Comment.	AEMO notes respondent's comment.
52.	25	AusNet Services	AusNet Services would have to establish "bots" with artificial intelligence to undertake these objections by the end of the day. Because objecting to MC assignments in contravention of electricity are the best interest of our customers.	AEMO notes respondent's comment.
53.	25	Australian Energy Council	No position.	AEMO notes respondent's comment.
54.	25	CitiPower Powercor	CitiPower Powercor support the 1 day period being retained. Reducing to zero days effectively means you don't have any opportunity to object.	AEMO notes respondent's comment.
55.	25	Endeavour Energy	<p>See our response to question 24. We suggest that the objection period be maintained as 1 business day.</p> <p>Note that we have suggested alternative options under question 1 that looks to address the issue AEMO wants to resolve without reducing the MC's right to object.</p> <p>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.</p> <p>The order of section 6 to section 41 is not listed in CR Code order which generally causes confusion for most readers as it is generally expected to be in order. We suggest that AEMO considers the order of these sections so that is more intuitive and easier for the reader.</p>	<p>Refer to response in Table 7 item 37.</p> <p>Whilst AEMO agree with the intent to provide clarity, AEMO are cautious about limiting CR labels that may be exclusionary.</p>
56.	25	EnergyAustralia	It would appear to place unreasonable constraint on the MCs, as the timeframe would require a significant increase in FTE to manage objections to that timeframe.	AEMO notes respondent's comment.
57.	25	Energy Queensland	<p>We suggest that this will depend on whether a system build to implement the full automation of the objection rules for "0" days is achievable. Where CRs are submitted outside of business hours (7am – 5pm), objections could be missed if automation is not achieved within system build.</p> <p>An option to error-correct where an objection may have been missed on the transfer of an MC is required.</p>	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
58.	25	Evoenergy	No, keep objections to the same timeframe.	AEMO notes respondent's comment.
59.	25	IntelliHUB Group	No. Some of these need to be investigated especially where there is a Direct Metering Agreement present. Monitoring of and investigations may need to take place regarding MC nominations and as previously stated MC's wear all the risk and a one day objection period is not unreasonable.	AEMO notes respondent's comment. Refer to responses in Table 1 items 18 and 32.
60.	25	Origin Energy	Origin will not be able to object if the period was reduced the zero days – especially if the transfer was to occur closer to the end of that business day. Most business systems work on batched processes scheduled to run outside of business hours for more efficient processing of high-volume transactions where validations need to occur. Origin operates in such a high-volume environment. Any changes from batched to real-time transaction processing/validations represents significant financial implications.	AEMO notes respondent's comment.
61.	25	PLUS ES	PLUS ES systems support the MC's ability to determine whether to object to transfers on the day the CR was requested.	AEMO notes respondent's comment.
62.	25	Public Interest Advocacy Centre	We consider MCs might need more time to make an informed decision.	AEMO notes respondent's comment.
63.	25	Red Energy / Lumo Energy	Red and Lumo have no comment on this change. However, please note that we do not consider that this change is warranted.	AEMO notes respondent's comment.
64.	25	SA Power Networks	We do not support the zero days objection timeframe, this does not provide the MC with sufficient time to review a change and determine if there is valid reason to object.	AEMO notes respondent's comment.
65.	25	Tango Energy	I expect it would depend what processes MCs have in place to validate and confirm they will undertake the MC role or if there is an existing Contractual arrangement that prevents the appointment of the New MC.	AEMO notes respondent's comment.
66.	25	TasNetworks	From TasNetworks point of view, this change to a zero day objection period would make identifying transactions that required an objection somewhat problematic, or at the very least place us at greater risk of missing the objection window. However, existing mechanisms exist to rectify erroneous nominations.	AEMO notes respondent's comment.
67.	25	United Energy	United Energy support the 1 day period being retained. Reducing to zero days effectively means you don't have any opportunity to object.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
68.	25	Vector Metering	We don't believe MC should get in the way of customer transfers. Any erroneous role changes included	AEMO notes respondent's comment.

Table 8 Issues Paper - Improvements to procedure drafting

No.	Question	Consulted person	Issue	AEMO response
Are there further suggestions on changes to structure to improve the clarity and accessibility of sections 1 to 6 of the MSATS CATS procedures?				
1.	26	Ausgrid	No Comment.	AEMO notes respondent's comment.
2.	26	AusNet Services	No response provided	AEMO notes respondent's comment.
3.	26	Australian Energy Council	No position.	AEMO notes respondent's comment.
4.	26	CitiPower Powercor	See feedback in Section 3.	Refer to response to items in Table 11.
5.	26	Endeavour Energy	<p>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.</p> <p>The order of section 6 to section 41 is not listed in CR Code order which generally causes confusion for most readers as it is generally expected to be in order. We suggest that AEMO considers the order of these sections so that is more intuitive and easier for the reader.</p>	Whilst AEMO agree with the intent to provide clarity, AEMO are cautious about limiting CR labels that may be exclusionary.
6.	26	EnergyAustralia	No comment.	AEMO notes respondent's comment.
7.	26	Energy Queensland	Ergon Energy and Energex have provided separate comments on the MSATS CATS procedures in the section below.	Refer to response to items in Table 11.



No.	Question	Consulted person	Issue	AEMO response
8.	26	Evoenergy	See notes below under Part 3. Other Issues.	Refer to response to items in Table 11.
9.	26	IntelliHUB Group	No Comment	AEMO notes respondent's comment.
10.	26	MEA Powershop	Powershop believes that the MSATS CATS procedures are relatively clear, noting that further changes will likely be required as the consultation progresses.	AEMO notes respondent's comment.
11.	26	Momentum Energy	Momentum supports the approaches proposed by AEMO for procedure drafting.	AEMO notes the respondent's support for the proposed change.
12.	26	Origin Energy	No comment	AEMO notes respondent's comment.
13.	26	Red Energy / Lumo Energy	See response to question 22.	Refer to response in Table 7 item 14.
14.	26	Simply Energy	No comments	AEMO notes respondent's comment.
15.	26	Tango Energy	Not at this time.	AEMO notes respondent's comment.
16.	26	TasNetworks	TasNetworks considers the structure of the procedures is clear.	AEMO notes the respondent's support for the proposed change.
17.	26	United Energy	See feedback in Section 3.	Refer to response to items in Table 11.
18.	26	Vector Metering	This is difficult to determine at this stage. Vector Metering thinks this question is better answered sometime in the future after participants have an opportunity to 'road test' the new version of the CATS procedures.	AEMO notes respondent's comment.
Do MSATS Participants believe that the proposed changes materially alter the obligations placed on them within the MSATS procedures?				
19.	27	Ausgrid	No Comment.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
20.	27	AusNet Services	AusNet Services considers the changes as proposed are too extensive and would disrupt our 5 minute settlement program resulting higher costs	AEMO notes respondent's comment. AEMO has proposed a series of changes in the draft determination that minimises the impact to distribution businesses including within Victoria.
21.	27	Australian Energy Council	No position.	AEMO notes respondent's comment.
22.	27	CitiPower Powercor	See feedback in Section 3.	Refer to response to items in Table 11.
23.	27	Endeavour Energy	No comment	AEMO notes respondent's comment.
24.	27	EnergyAustralia	No comment.	AEMO notes respondent's comment.
25.	27	Energy Queensland	While the proposed changes are significant in some instances, they do not change the obligation, only the ability to react in some business scenarios. Please also refer to separate comments on the MSATS CATS procedures in the section below.	AEMO notes respondent's comment and refer to response to items in Table 11.
26.	27	Evoenergy	If an MDP has to now send Last Read Date and read type, then Yes, high impact to CR transaction volumes. Derive the value from within MSATS. In the long term, all meter data will get sent to MSATS. This will have less impact to participant systems, and far outweighs the costs required for all participants to maintain a large volume of transactions.	AEMO notes section 24 has been removed as the MDP is no longer updating Last Read Date.
27.	27	IntelliHUB Group	No as long as we as an MC still have an opportunity to object.	AEMO notes respondent's comment.
28.	27	MEA Powershop	Powershop does not believe that the proposed changes materially alter the obligations within the MSATS procedures.	AEMO notes respondent's comment.
29.	27	Origin Energy	The proposed changes outlined as part of these Procedural changes will require multiple system changes due to already established automation as well as updating of training documentation and rollout of new processes. Based on this, there will be a significant cost to Origin as well as impact to resourcing due to conflicting market priorities i.e. 5 Minute Settlements.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
			Attachment 1 includes some of the identified changes that Origin would need to undertake to be compliant with the Procedures.	
30.	27	PLUS ES	<p>PLUS ES believes the proposed changes appear to be changing the MDP obligation, for manually read meters. The MDP is now responsible for providing an estimate for a FRMP churn where previously the FRMP churn was completed on a meter reading. This will lead to Transfer disputes that will involve the MDP.</p> <p>AEMO needs clear rules on how Transfer readings are to be updated where subsequent routine readings deem the Transfer read to be invalid.</p> <p>Manual processes to correct Transfer readings is not an acceptable outcome of this Rule Change as it requires further MDP resources.</p>	AEMO notes respondent's comment. AEMO notes that this will occur as per the current process within the MDP SLP and Metrology Procedure Part B.
31.	27	Red Energy / Lumo Energy	<p>Yes. Please refer to submission above.</p> <p>Estimate reads as a transfer type</p> <p>Wholesale settlement, network settlement and retailer billing must continue to align even within the context of faster transfers; this is a key element of the NEM and reflects retailers' role. The use of actual meter data is cornerstone to settlement of the wholesale market, billing of customer invoices and settlement of network charges. It ensures retailers are billing their customers for their actual consumption, and are then billed for the same consumption in the network and wholesale settlements. The proposed change to estimated reads as the basis for a final transfer coupled with the requirements for retailers to adjust bills would fundamentally alter this arrangement and therefore warrants further analysis.</p> <p>The Australian Competition and Consumer Commission (ACCC) specifically stated in its Retail Electricity Pricing Inquiry (REPI) that the AEMC "should explore ways to enable the use of self-reads to facilitate faster transfer times (and as a less costly process than arranging for a special read) when a person is remaining at the same property."⁴ However, it did not recommend the use of estimated reads to facilitate faster transfers. This is an extension of scope by AEMO, which will generate inefficiencies and create significant risks, with limited benefit for both consumers and retailers. The net result is a poor customer experience and does not meet the NERO or NEO.</p> <p>The AEMC has looked at the use of estimated reads for customer transfers on numerous occasions and in 2016 it specifically concluded that when "complexity in implementation are taken into account, the Commission now considers the introduction of an additional transfer option using estimated reads is not likely to be in the long term interest of consumers and will not contribute to the achievement of the national electricity objective."⁵ We do not believe that AEMO has put forward</p>	AEMO refers the respondent to AEMO's rule change proposal for customer transfers in the NEM, in particular section 2.3.2 of Appendix A regarding settlement and the requirement for meter readings and change dates. The nature of half-hourly settlement for metering installations that record energy on an accumulation basis means that there is inherent inaccuracy determined by the design itself. The net system load profile applied for connection points with accumulation metering installations is not designed to be reflective of any one customer's energy consumption on any given quarterly reading cycle, week, day, or half hour.



No.	Question	Consulted person	Issue	AEMO response
			<p>any strong evidence as part of its proposal which address any of the aforementioned issues and that these problems will remain in place.</p> <p>⁴ ACCC, Retail Electricity Pricing Inquiry - Final Report, June 2018, p153</p> <p>⁵ AEMC, Final Rule Determination, National Electricity Amendment (Using estimated reads for customers transfers) Rule 2017, p i</p>	<p>AEMO notes that retailers are empowered to reduce their risks regarding exposure to net system load calculations by installing remotely read metering installations.</p> <p>On the topic of the use of estimated readings, AEMO refers the respondent to the consideration of reading methods and the use of estimated meter readings in section 4.4 of the Draft Report.</p> <p>AEMO refers the respondent to AEMO's rule change proposal for customer transfers in the NEM, where the case for change was considered including an assessment against the relevant market objectives. Further, AEMO refers the respondent to the AEMC and AEMO joint advice to COAG on 3rd December 2018 which precipitated AEMO's rule change request following COAG endorsement.</p>
32.	27	Simply Energy	Simply Energy considers that except for one particular amendment (raised in response to Q1 above regarding flexibility to nominate MC role in CR1000 series), the remainder of the changes do not alter the obligations, but provide optionality to retailers to consider in their transfer processes.	AEMO notes respondent's comment and refer to response in Table 1 item 18.



No.	Question	Consulted person	Issue	AEMO response
33.	27	Tango Energy	There are NERR and Vic Transfer Code considerations in terms of the timeframes required to advise customers of a successful transfer or a delay in the transfer. The proposed changes must ensure these NER and Vic Transfer Code obligation can be met.	AEMO notes respondent's comment. AEMO supports the NER and Victorian Transfer Code and doesn't consider there is anything in AEMO's proposal that conflicts with these.
34.	27	TasNetworks	TasNetworks does not consider this to be the case.	AEMO notes respondent's comment.
35.	27	United Energy	See feedback in Section 3.	Refer to response to items in Table 11.
36.	27	Vector Metering	Re-drafting the procedures to provide clarity should not introduce any new obligations. Vector has not performed any analysis on the impact of the re-drafting to determine if there are unintended consequences from the changes. If these do eventuate Vector expects this will be addressed via the ERCF or other industry mechanisms.	AEMO notes respondent's comment.

Table 9 Issues Paper - Consequential changes to the Meter Data File Format (MDFF) Specification NEM12 & NEM13 (MDFF)

No.	Question	Consulted person	Issue	AEMO response
Is the change to the reason code in the MDFF necessary?				
1.	28	AGL Energy	AGL notes that consequential changes are envisaged for the Meter Data File Format and Specification NEM12 and NEM13. In order to support the timeliness of transfers, AGL would request that AEMO establish appropriate systems to: <ul style="list-style-type: none"> • enable transfer completion and read files to be received on the same day; and • in the context of retailers receiving new customers in a transfer process, C4 also be received on the same day. 	AEMO notes respondent's comment. AEMO has proposed no change to the delivery of read files and note that AEMO systems currently facilitate provision of a C4 within the COM notification message.
2.	28	Ausgrid	No Comment.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
3.	28	AusNet Services	AusNet Services strongly recommends all changes to the MDFF are deferred until the implementation of 5 minute settlements. The proposed addition to the reason code in the MDFF is not necessary to delivering customer benefits. We are currently in the process of making changes to our metering data management systems for the 5 minute settlements program. This unnecessary change to the MDFF would impact this work, resulting in additional cost and risk.	AEMO notes respondent's comment and the impact for AusNet as part of their SMS preparations.
4.	28	Australian Energy Council	No position.	AEMO notes respondent's comment.
5.	28	Endeavour Energy	We agree with AEMO's proposal to have a reason code of 67 for substitutions created due to a transfer as this will help with auditing and any disputes.	AEMO notes the respondent's support for the proposed change.
6.	28	EnergyAustralia	No comment.	AEMO notes respondent's comment.
7.	28	Energy Queensland	We agree the change to the reason code in the MDFF is necessary.	AEMO notes the respondent's support for the proposed change.
8.	28	Evoenergy	Yes as it is clear what the last substituted read was for.	AEMO notes the respondent's support for the proposed change.
9.	28	IntelliHUB Group	No Comment	AEMO notes respondent's comment.
10.	28	MEA Powershop	Powershop believes that the change to the reason code in the MDFF is categorically necessary to support the proposed changes.	AEMO notes the respondent's support for the proposed change.
11.	28	Momentum Energy	Momentum supports the approaches proposed by AEMO for this item.	AEMO notes the respondent's support for the proposed change.
12.	28	Origin Energy	Origin supports the change to the reason code in MDFF.	AEMO notes the respondent's support for the proposed change.



No.	Question	Consulted person	Issue	AEMO response
13.	28	PLUS ES	Yes, the reason code is required, to identify the reason why a substituted value was provided at that point in time.	AEMO notes the respondent's support for the proposed change.
14.	28	Red Energy / Lumo Energy	Red and Lumo do not believe that changes to the MDFF reason code are necessary. However, as part of the cost benefit analysis proposed we request AEMO clarify the potential impact to a change to the reason code in the MDFF. This will allow Red and Lumo to confirm our support or otherwise, and provide information to AEMO on the likely impact of a change to the reason code in the MDFF.	AEMO notes respondent's comment.
15.	28	Simply Energy	<p>Aligned</p> <p>Response to questions 28 and 29:</p> <p>Simply Energy agrees with the amendment and proposes a minor change to the current mark-up as follows: "Code 67, Estimated read provided by the MDP to enable customer transfer".</p> <p>Simply Energy believes that the new proposed Code 67 will not be sent by the MDP where an Actual Read is taken, because there are other codes (Code 0 for example) used currently for actual reads. Also, it is important to highlight who provided these reads, so it is easier to filter them from customer provided reads.</p>	AEMO notes the respondent's support for the proposed change. AEMO's preference is keep the simple wording to allow for all scenarios where this code is used.
16.	28	Tango Energy	Yes. The addition of Reason Code 67 – Transfer, adds clarity to the reason why the read was provided.	AEMO notes the respondent's support for the proposed change.
17.	28	TasNetworks	TasNetworks does consider the new code is necessary. It would greatly help to identify the substitute readings for reporting and other business activities.	AEMO notes the respondent's support for the proposed change.
18.	28	Vector Metering	Vector Metering does not believe this is necessary. Participants receipt of meter data is driven by the role assignments in the market. Where a role changes MDP's routinely send meter data to the new FRMP for periods that they are responsible for. Indicating that this is to support a customer transfer doesn't appear to be critical. Retailer will know when they have won or lost a customer.	AEMO notes respondent's comment.
Should other changes be considered to the MDFF to accommodate the changes proposed in this Issues Paper?				
19.	29	Ausgrid	No Comment.	AEMO notes respondent's comment.



No.	Question	Consulted person	Issue	AEMO response
20.	29	AusNet Services	No, AusNet Services considers the MDFF are unnecessary. They would disrupt our 5-minute settlements implementation program and hence be costly.	AEMO notes respondent's comment and refer to response in Table 9 item 3.
21.	29	Australian Energy Council	No position.	AEMO notes respondent's comment.
22.	29	Endeavour Energy	No comment	AEMO notes respondent's comment.
23.	29	EnergyAustralia	No comment.	AEMO notes respondent's comment.
24.	29	Energy Queensland	No comment.	AEMO notes respondent's comment.
25.	29	Evoenergy	No other changes required.	AEMO notes respondent's comment.
26.	29	IntelliHUB Group	No Comment	AEMO notes respondent's comment.
27.	29	MEA Powershop	Powershop believes that the reason code change listed above is the only necessary change required to facilitate the switching process.	AEMO notes respondent's comment.
28.	29	Origin Energy	No comment	AEMO notes respondent's comment.
29.	29	Red Energy / Lumo Energy	See response to question 28.	AEMO notes respondent's comment and refer to response in Table 9 item 14.
30.	29	Tango Energy	Not at this time.	AEMO notes respondent's comment.
31.	29	TasNetworks	TasNetworks does not consider that any further changes are required.	AEMO notes respondent's comment.
32.	29	Vector Metering	Not that Vector Metering can see.	AEMO notes respondent's comment.

Table 10 Issues Paper - Timing and implementation

No.	Question	Consulted person	Issue	AEMO response
Is the rationale described in this Issues Paper regarding the proposed timing for implementation reasonable?				
1.	30	AGL Energy	<p>Based on AEMO's advice that it will complete the review of the necessary changes to MSATS by February 2020, AGL recommends that the start date of the new transfer framework should be no sooner than September 2020. This will provide a minimum of at least 6-months to enable retailers and MDPs to build and test appropriate system capabilities to operate in the new framework.</p> <p>AGL appreciates that the primary objective of the AEMC draft Rule and AEMO HLD are to modernise a transfer process that is no longer fit for purpose. In order to support that objective, AGL would also encourage AEMO to undertake appropriate system changes in relation to its own supporting operating systems. For example, with the continued use of overnight batched systems, the potential remains for customers to experience delay in the transfer process. We would therefore encourage AEMO to develop appropriate real-time processes that can appropriately support an efficient and seamless customer experience in transferring between retailers. This could be implemented in the context of AEMO's forthcoming system upgrades for 5-minute and global settlements.</p> <p>AGL appreciates the rationale described in the Issues Paper regarding the proposed timing for implementation. AGL anticipated that the associated system build requirements and testing would necessitate a 6-month development timeframe. AGL would recommend that the changes be implemented no earlier than September 2020, ensuring a sufficient lead time of at least 6 months, to enable retailers and MDPs to build appropriate system capabilities.</p> <p>We would also recommend that the proposed changes only be applied to transfers requested after the implementation date and that any transfers already in motion be subject to the current process requirements. This will ensure that all transfers are treated in a consistent manner by retailers.</p>	AEMO has reviewed the solutions for delivery of the customer switching review and determined that the implementation should be aligned with the timing of other changes that require schema updates in December 2020 and refers to the submission and assessment discussion in Section 4.9 of the Draft Report.
2.	30	Ausgrid	No Comment.	AEMO notes respondent's comment.
3.	30	AusNet Services	<p>AusNet Services does not agree with the rational provided in the issues paper. Firstly, while the issues paper recognises impacts on retailers and MDPS, the rational provided does not recognise the impacts on DNSP systems and processes and our important role in updating standing data. We don't know why AEMO would ignore the DNSP's important role.</p> <p>Secondly, the issues paper assumes all work on 5 minute settlements does not start until mid-2020. AusNet Services and other participants have already started.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.



No.	Question	Consulted person	Issue	AEMO response
			<p>Alternatively, AusNet Services suggests substantially limiting the impact of this procedure change to just minimal changes to prevent 'retailer save activities' and defer all other changes until after 5 minute settlements.</p> <ol style="list-style-type: none"> 1. As proposed in the issues paper, limit the scope of customer switching change request transactions in MSATS, so that only the retailer role is changed in the transfer process; 2. Reduce the objection logging time for retailer transfers to zero days and new retailers would avoid save activity by batching transfers until 7pm; 3. Develop changes outlined in option 2 to enable the NMI Discovery process to provide the previous meter data read. <p>Limiting switching review associated changes to just these 3 changes will de-risk the AEMO's and industry delivery programs and materially reduce our implementation costs. The other deferred changes can be undertaken on or after 5 minute settlements.</p>	
4.	30	Australian Energy Council	<p>The AEC does not consider that implementation in May is practical for retailers, nor would the benefits of early implementation outweigh the costs.</p> <p>The AEC has consistently argued for regulators and other rule makers to only undertake 'urgent' changes where there is a critical need to avoid customer harm. Urgent changes significantly increase costs, requiring retailers to divert resources from more other projects to meet a regulatory need. We do not consider these procedure changes meet the definition of urgent, and as such, should be implemented in a manner that mitigates costs to the extent possible.</p> <p>The AEC considers implementing these changes in the November schema release would allow retailers more time to develop processes and procedures to deliver the objective of next day transfers, whilst retaining positive customer experiences.</p> <p>We do not agree with views of AEMO staff that these changes will be optional for retailers, with only those who choose to utilise the new procedures to facilitate faster transfers required to implement the changes.</p> <p>The AEC expects that all retailers, irrespective of their intentions, will need to implement the changes on the change date. This need is highlighted by the changes to CR 1040, where the losing retailer will have no control over the process in which a NMI is lost, and subsequently returned. Failing to implement all changes on the change date may result in these error corrections not being actioned, impacting in poor customer outcomes.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.



No.	Question	Consulted person	Issue	AEMO response
5.	30	CitiPower Powercor	<p>Considering the final determination for these procedure changes is not scheduled to February 2020, the proposed changes require significant system build, involvement of external vendors and we will be in the midst of the 5MS & GS program a May 2020 delivery is impossible.</p> <p>Our preference for the go-live of changes relating to this rule change is after July 2021.</p> <p>Our business would be happy to discuss and provide further clarification to AEMO of the work and effort involved.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.
6.	30	Endeavour Energy	<p>We disagree with AEMO's proposal to make the procedures effective 20 May 2020. We note that AEMO plans to release the final determination on 21 February 2020, which would provide only 3 months for participants to design, build and test significant changes to their systems and processes. From past experience changes that were not as significant as this change were afforded six months before they became effective.</p> <p>We believe that given the size and complexity of this change around 9 months is required, which would mean, at the earliest, an effective start date in quarter 4 of calendar year 2020.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.
7.	30	EnergyAustralia	<p>The proposed timeline for May 2020, or soon after, is inadequate and would present significant challenges for retailers, even without a schema change.</p> <p>If we assume AEMO were to finalise the changes by 21 February as per their published timeframe, that would leave 3 months for retailers to decide what options to use under the new framework for customer transfers and then implement those options. This would require undertaking option analysis, a detailed impact assessment on their billing systems, processes and people, and then implementing the required changes.</p> <p>The alternative timeframe of November 2020 has been mentioned at industry workshops. This would appear to be a more reasonable timeframe to work to.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.
8.	30	Energy Consumers Australia	<p>We consider that the proposed changes should be implemented as soon as practicable given the benefits to be gained by consumers. AEMO's proposed implementation date of May 2020 appears to appropriately balance the need to implement these changes quickly for consumers (especially noting the higher switching rates of the June / July period) and that retailers will need to make systems changes to accommodate the new arrangements.</p>	AEMO notes the respondent's support for the proposed change.
9.	30	Energy Queensland	<p>While the explanation appears to be reasonable, we believe that May 2020 is a tight delivery timeframe for the changes being proposed for the whole of the industry. There is system design, build and implementation required to facilitate this change which requires engagement with system vendors, along with a proposed schema upgrade which is a significant piece of work, as noted by AEMO.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.



No.	Question	Consulted person	Issue	AEMO response
			<p>Industry testing between participants is usually a standard to conduct with these changes and this requires co-ordination. For DNSPs, May is an extremely busy time of the year with yearly tariff rate updates due, and in July 2020 Ergon Energy and Energex will be implementing tariff reforms which will have impacts on Retailers and the Market. Similar challenges also apply to Retailers.</p> <p>We suggest AEMO consider consulting with participants to ascertain other deliverables within their business that are required to be met.</p> <p>Changes of this size and nature also need to be budgeted for. Given that the consultation did not commence until July 2019, provisions have not been made for this implementation in the 2019-20 budgets for Ergon Energy and Energex.</p>	
10.	30	ERM Power	<p>AEMO proposed changes are extensive and must be considered in the context of other system changes that are absorbing significant IT resources. As mentioned earlier, we have provided AEMO with time and costs estimates of our systems changes to accommodate AEMO's preferred options. The required IT development for this reform will have a cascading impact on the various other reforms already in the pipeline and will compete and have impact on the availability of resources for the 5 minute and global settlement project.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.
11.	30	Evoenergy	No! with concerns around industry testing, but accepted.	AEMO notes respondent's comment and refer to response in Table 10 item 1.
12.	30	IntelliHUB Group	Yes	AEMO notes the respondent's support for the proposed change.
13.	30	MEA Powershop	<p>Powershop does not believe that the rationale described regarding the proposed timing for rationale sufficiently takes into consideration the system changes that retailers, and potentially other participants, will be required to make to their systems.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.
14.	30	Momentum Energy	<p>As mentioned earlier Momentum fully supports the general approach with these customer switching enhancements, that will reduce transfer times, for customers that do not have remotely read interval meters. We do not believe that these changes should be rushed into the market simply to address a slightly higher customer switch period of June/July 2020. Rather they should be delayed to at least Q4 2020 or some later date that allows retailers and other participants more time to coordinate a suitable cross industry transition implementation time. These changes include new and amended transactions that all parties will need to manage, regardless of whether they initiated them. Hence this is not an individual participant decision.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.



No.	Question	Consulted person	Issue	AEMO response
15.	30	Origin Energy	<p>The implementation timing of May 2020 is not achievable.</p> <p>It is proposed that the final report will not be published until 21 February 2020. At this time, the system amendments will need to be fully scoped, system changes, training and testing need to be conducted. The changes are extensive, will be timely to undertake and requested in an environment of extensive system changes for projects like 5-minute settlements. The timing would need to be decided with consultation of the 5-minute settlement group.</p> <p>A rushed implementation may hurt the reputation of the industry and result in a poor customer experience. The implementation of the Power of Choice reforms is an example of how a rushed implementation did not deliver the desired benefits to customers. It has taken costly system and process iterations to work towards the desired benefits. We should take learnings from this process.</p> <p>As outlined in our attached letter, while we support initiatives to reduce customer switching times, we consider that the proposed changes are extensive and introduce unnecessary risk and costs for the parties involved.</p> <p>Further, we have a fundamental concern that the proposed changes include significant policy shifts without the corresponding level of appropriate consultation on the policies. Policy considerations include meter read types for transfer, transferring within the cooling off period and transfers within 2 business days of the cooling off period. These have the potential to have significant impacts on both the operational and reputational aspects of the energy market.</p> <p>We thus believe it is imperative that the AEMC and AEMCO work together to ensure that any changes to the transfer framework are supported by a clear quantitative assessment that shows that the market and consumer benefits clearly outweigh the industry costs.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.
16.	30	PLUS ES	PLUS ES supports the implementation of the changes to align with the May 2020 MSATS release, no earlier.	AEMO notes the respondent's support for the proposed change.
17.	30	Public Interest Advocacy Centre	Yes	AEMO notes the respondent's support for the proposed change.
18.	30	Red Energy / Lumo Energy	<p>No. Please refer to Red and Lumo's commentary on the implementation of the proposed changes above.</p> <p>Implementation of the proposed changes</p> <p>While Red and Lumo do support some of the proposed changes put forward by AEMO and believe that they will deliver a range of benefits to consumers we do not agree that with AEMO that</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.



No.	Question	Consulted person	Issue	AEMO response
			<p>proposed changes should be “implemented in line with the May 2020 MSATS release.”⁷ As noted, Red and Lumo would be willing to upon request by AEMO provide a confidential break down of the likely costs of this project as well as the current resources allocated for the introduction of other proposed changes. Currently, the industry is facing a huge range of regulatory changes with fixed implementation dates. Many participants have already dedicated available resources in order to implement 5 minute settlement on 1 July 2021 and global settlements on 1 February 2022. This means that industry are unlikely to have adequate resources to implement market changes when considering other potential regulatory changes prior to the introduction of 5 minute settlements. Particularly as we expect that implementation of the consumer data right is also likely to be required within this window.</p> <p>AEMO argues that a May 2020 release would be “prior to the industry at large moving focus to implementation of recent settlement rule changes,”⁸ however, this is not the case for Red and Lumo. Regulatory changes are not only crowding out implementation of business improvement changes but industry’s ability to source additional resources available to implement this change (given the allocation of 5 minute settlement resources) will be challenging and costly.</p> <p>Furthermore, it should be remembered that Australia has one of the highest churn rates compare to other jurisdictions in the world (specifically the UK, France and New Zealand) despite despite these jurisdictions having many of the transfer options in place that are being proposed by AEMO. We therefore believe that by most measurements the market as it stands is currently functioning effectively for customer transfers between retailers. While we agree that many of the proposed changes would improve outcomes for consumers we therefore question the urgency of the change. We believe that AEMO has not adequately assessed the impact of the changes and believe that any implementation date should be at least after the implementation of 5 minute settlement. We believe that the earliest potential implementation date for the proposed changes to be successfully implemented would be November 2021.</p> <p>⁷ Australian Energy Market Operator, Customer Switching in the NEM: Issues paper, October 2019, p27</p> <p>⁸ Ibid, p27</p>	
19.	30	SA Power Networks	<p>SA Power Networks will not be able to achieve a May 2020 go live timeframe.</p> <p>The final determination for these changes will only be provide at the end of February 2020 and given the significant changes required, this does not provide adequate design, build and test timeframes.</p> <p>Given the changes already underway for other industry initiatives, we request that the effective date for these changes be targeted for the second half of 2021 (after 1 July 2021).</p>	AEMO notes respondent’s comment and refer to response in Table 10 item 1.



No.	Question	Consulted person	Issue	AEMO response
			We would be pleased to discuss the significant impacts that any earlier effective date timeframes would create with AEMO.	
20.	30	Simply Energy	<p>Aligned provided CR1000 series structure is not impacted.</p> <p>Response to questions 30 and 31:</p> <p>Simply Energy agrees that while there are system changes in the proposed structure, majority of the changes provide a customer benefit and provide value over time. However, the proposed MC role separation from CR1000 would be a costly exercise with negative benefit (as explained in the response to Q1).</p> <p>If the change impact can be minimised (especially with the adoption of Option 2 raised in response to Q1), while <u>not compromising the overall objective</u>, Simply Energy is comfortable with implementation for May 2020 or later, but no later than November 2020. This is to avoid resource conflicts with other industry-led project implementation dependencies post November 2020 (including 5-minute settlement, Standing Data changes, and Consumer Data Right).</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.
21.	30	Tango Energy	The May 2020 delivery date of the customer switching changes is impractical. Participants are faced with the ongoing implementation of 5MS/GS. Existing resources would be stretched to deliver the switching changes and additional funding required.	AEMO notes respondent's comment and refer to response in Table 10 item 1.
22.	30	TasNetworks	The rationale described is reasonable on the basis that there are no new transactions or a schema change required. TasNetworks still holds the belief that combining these changes with the 5MS/GS releases would help to keep implementation costs to a minimum for both participants and their vendors.	AEMO notes respondent's comment and refer to response in Table 10 item 1.
23.	30	United Energy	<p>Considering the final determination for these procedure changes is not scheduled to February 2020, the proposed changes require significant system build, involvement of external vendors and we will be in the midst of the 5MS & GS program a May 2020 delivery is impossible.</p> <p>Our preference for the go-live of changes relating to this rule change is after July 2021.</p> <p>Our business would be happy to discuss and provide further clarification to AEMO of the work and effort involved.</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.
24.	30	Vector Metering	No. Vector Metering will require vendors to make changes to its systems to accommodate the required process changes. MDP will be required to update Last read date and quality. Vendors are currently focussed on making other changes to meet other regulatory changes –e.g. ICF Metering Package, 5MS and GS, B2B v3.4; Vendors and participants do not have an endless pool of resources	AEMO notes respondent's comment and refer to response in Table 10 item 1.



No.	Question	Consulted person	Issue	AEMO response
			to design, develop, test and implement the changes proposed by AEMO. Vector could not meet a May 2020 timeframe.	
Are there other considerations or proposals that AEMO might consider regarding the timing for implementation of the proposed changes?				
25.	31	Ausgrid	No Comment.	AEMO notes respondent's comment.
26.	31	AusNet Services	<p>AusNet Services proposes AEMO substantially limits the impact of this procedure change to just minimal changes to prevent 'retailer save activities' and defer all other changes until after 5 minute settlements.</p> <ol style="list-style-type: none"> As proposed in the issues paper, limit the scope of customer switching change request transactions in MSATS, so that only the retailer role is changed in the transfer process; Reduce the objection logging time for retailer transfers to zero days and new retailers would avoid save activity by batching transfers until 7pm; Develop changes outlined in option 2 to enable the NMI Discovery process to provide the previous meter data read. <p>Limiting switching review associated changes to just these 3 changes will de-risk the AEMO's and industry delivery programs and materially reduce our implementation costs. The other deferred changes can be undertaken on or after 5 minute settlements.</p>	AEMO notes respondent's comment and refer to responses to Table 8 item 20, Table 9 item 3 and Table 13 item 7.
27.	31	Australian Energy Council	No position.	AEMO notes respondent's comment.
28.	31	CitiPower Powercor	See 30.	Refer to response in Table 10 item 5.
29.	31	Endeavour Energy	<p>Due to the size and complexity of issues expected to be raised during consultation we suggest that AEMO highlight their key decisions/direction, preferably through a webex workshop, prior to publishing their draft determination and final determination. This will help industry to better understand AEMO's position and allow for an open dialogue to identify major issues.</p> <p>We also request that at least 2 more weeks is provided for participants to provide their feedback on the draft determination. The combination of complex issues along with a holiday period means that feedback by 23/01/2020 is insufficient.</p> <p>In addition, 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</p>	<p>AEMO notes respondent's comment and refer to response in Table 10 item 1.</p> <p>AEMO notes it has provided additional time for feedback on the draft determination.</p>



No.	Question	Consulted person	Issue	AEMO response
			of industry testing, developing an industry transition and cutover plan, go-live criteria and readiness reporting.	
30.	31	EnergyAustralia	AEMO should consider reducing the scope of the changes. There are proposed changes that are not directly related to reducing customer switching timeframes e.g. embedded networks, that could be de-scoped from this set of changes.	AEMO has considered submissions and has simplified the scope of design changes for transfer CRCs.
31.	31	Energy Queensland	The implementation of the proposed changes coincides with Queensland's storm season, and depending on the severity of the season, this could impact the delivery of this piece of work. Ergon Energy and Energex would prefer a November implementation.	AEMO notes respondent's comment and refer to response in Table 10 item 1.
32.	31	ERM Power	<p>A full cost benefit analysis is crucial to test impacts</p> <p>In the current environment, where retailers are burdened with numerous transformative rule changes and rising electricity costs have put pressure on many households and businesses, it has never been more important to ensure additional changes are quantitatively tested to be in the long term interests of consumers, meeting the National Electricity Objective, i.e. that the benefits should outweigh the costs. We are concerned that AEMO has dismissed the need to conduct a cost benefit check and deemed that it is not compelled to take one². Now is not the time to implement costly system changes based on AEMO's speculation of the outcome, absent of proper analysis.</p> <p>It is hard to imagine significant, and untested, incremental cost being imposed on industry in this environment, but we can see that AEMO is proposing to do just that. We have separately provided our system cost and time estimates to AEMO with this submission and suggest that AEMO should apply a disciplined approach, quantitatively analysing its proposals to determine whether the changes produced a net benefit and therefore should progress.</p> <p>The system change costs are significant. We have analysed the options and note these changes will divert our resources away from progressing the 5 minute and global settlement implementations. These changes will impact heavily on IT resources that would otherwise be dedicated to further expanding innovation, product development and improved service offerings to customers. Ultimately it is customers that are negatively impacted, through this and any additional costs passed through, including those from AEMO's system changes.</p> <p>² See Customer Switching Workshop 21 August 2019 feedback notes page 7</p>	AEMO notes respondent's comment and refers to the responses in Table 13 items 5 and 7.
33.	31	ERM Power	The case for urgent change is unconvincing	AEMO notes respondent's comment and refers to the



No.	Question	Consulted person	Issue	AEMO response
			<p>In the background of high implementation costs, we see the case for urgent change is weak. There is little supporting analysis or data in AEMO's HLD document to suggest that urgent reform is needed. Further, analysis around the need for urgent reform is absent in AEMO's Issues Paper. AEMOs' Issues Paper highlights the likely inconsequential impacts of some of the changes, for example with regards to the removal of objections for debt, only ~0.3% of transfers are currently objected to on this basis³. With respect to the concurrent appointment of MC, MP, and MDP with a customer transfer request, AEMO has provided insufficient evidence or data to support the argument that this is driving any significant issues in transfer delays, let alone an issue warranting immediate Procedure change.</p> <p>Data on transfers⁴ and Ombudsman complaints surrounding transfer delay illustrates the lack of justification for the broad changes proposed. In its latest report for 2018/2019, EWON noted complaints surrounding transfer delays for both gas and electricity accounted for 375 complaints⁵. This is in the context of the approx. 730,000 small customer electricity transfers completed over this time in NSW. In its submission to the AEMC Reducing customers' switching times (retail) Rule Change, EWON noted that it had only received 1 complaint relating to MC objections, in the previous 3 months ending June 2019⁶. Similarly, of the approximately 346,000 completed electricity transfers that occurred over the same period in QLD, there were 12 complaints to all retailers relating to transfer delays and 3 complaints relating to objections raised by the retailer⁷. It appears transfer delays are not a pressing issue.</p> <p>We see that any benefits of this change are ever diminishing with the roll out of advanced metering which speeds up customer transfers. Further, gains to customer transfers will likely be made once the full benefits of advanced metering are realised in states that are yet to fully adopt remote services. If the NSW Government's current moratorium on remote meter de energisation and re energisation is lifted, and the Queensland Government commits to removing the legislative impediments to remote re-energisation as recommended in the recent Ministerial advice by the Queensland Competition Authority on the benefits of advanced digital metering, we expect benefits of advanced metering installation would provide greater incentives for roll outs and improvements to customer transfers.</p> <p>³ AEMO Customer Switching in the NEM Issues Paper, October 2019 page 10</p> <p>⁴ Data on transfers derived from AEMO retail statistical data on small customer transfers for each jurisdiction over the 2018/ 2019 year. See https://www.aemo.com.au/Electricity/National-Electricity-Market-NEM/Data/Metering/Retail-Transfer-Statistical-Data for small customer completed transfers July 2018 to Jun 2019</p> <p>⁵ Energy & Water Ombudsman NSW Annual Report 2018-2019, page 29</p>	response in Table 13 items 5 and 7.



No.	Question	Consulted person	Issue	AEMO response
			⁶ EWON submission to AEMC Reference RRC0031 – Reducing customers' switching times (retail), 1 August 2019 page 1 ⁷ Energy and Water Ombudsman of Queensland, Annual Report 2018 -19 page 47	
34.	31	Evoenergy	Industry is getting flooded with changes at present, which requires extra resources and costs. These were not included in regulated budgets, and not within current budget allowances.	AEMO notes respondent's comment. Along with other submissions received, AEMO has reviewed the proposed changes and sought to minimise the changes (as presented in the draft) for various participants.
35.	31	IntelliHUB Group	No	AEMO notes respondent's comment.
36.	31	MEA Powershop	<p>Powershop believes that even if the 'low impact' options we recommend are adopted, there will be significant modifications to a participant's systems in order to facilitate the following changes:</p> <ul style="list-style-type: none"> - Losing participant only receiving a notification when the switch completes. Retailer systems are built to expect a Request, Pending, Completed – in that order –to facilitate a customer switch. Adjusting this process, at the same time as having a clear benefit in meeting the objections of the rule change, is a significant change to core logic of transfers, and requires a significant implementation period; - Schema changes to MSATS to include previous read date will need to be built into participant's systems; - Changes to the CRC 1000 reason type codes will need to be built; - CRC 1026, the use of which will be greatly expanded, will have to be rebuilt in market participant systems; - The cooling off period, which would be hard coded into a market participant's systems, will have to be rebuilt entirely; and - Staff training on the new functionality, as well as the changes themselves, will have to be conducted. <p>Powershop emphasises that if the implementation period does not give market participants an appropriate timeframe to build and test their systems in relation to the change, there would be no</p>	AEMO notes respondent's comment and refer to response in Table 10 item 1.



No.	Question	Consulted person	Issue	AEMO response
			workaround available. We also believe customers could be subject to duplicate billing or billing delays. AEMO has acknowledged that the June-July period normally has a very high level of switching transactions, rendering the slim timeframe more contentious. Powershop believes that a more suitable implementation time would be 1 October 2020 to ensure a smooth transition process.	
37.	31	Origin Energy	Please see question 27	Refer to response to Table 8 item 29.
38.	31	PLUS ES	PLUS ES notes that changes will also impact MC/MPB systems not only limited to the MDP participant.	AEMO notes the respondent's comment.
39.	31	Red Energy / Lumo Energy	<p>Yes. Please refer to Red and Lumo's commentary on cost benefit analysis and the implementation of the proposed changes above.</p> <p>Cost benefit analysis</p> <p>The National Energy Retail Objective (NERO) and National Electricity Objective (NEO) both describe the clear need for any potential changes to be efficient and balanced. Specifically, the retail objective in the NERO states:</p> <p><i>"to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy."</i>¹</p> <p>AEMO has provided no clear demonstration how the proposed changes will be efficient and cost effective, and if the proposals are the best option to meet the NERO and the NEO. To properly demonstrate this, it is imperative that AEMO conducts a full cost benefit analysis of the proposed changes. This should incorporate not just the costs for AEMO to implement changes but also for retailers, networks, metering service providers and third party participants and compare it to the expected benefits derived for consumers.</p> <p>The cost benefit assessment should also take into consideration whether the costs would be different if the change is implemented in May 2020, December 2020 or after 1 July 2021. This consideration is pertinent with the amount of resources dedicated to delivering other market changes, including customer data right, 5 minute settlement and global settlement. These changes have (or will have) fixed implementation dates, whereas this change is discretionary.</p>	<p>AEMO notes respondent's comment and refers to the responses in Table 13 items 5 and 7.</p> <p>Refer to response to Table 10 item 1 in regard to Implementation of the proposed changes.</p>
40.	31	SA Power Networks	See response to question 30.	Refer to response to Table 10 item 19.



No.	Question	Consulted person	Issue	AEMO response
41.	31	Tango Energy	Refer above.	Refer to response to Table 10 item 21.
42.	31	TasNetworks	As per response to question 30.	Refer to response to Table 10 item 22.
43.	31	United Energy	See 30.	Refer to response to Table 10 item 23.
44.	31	Vector Metering	These changes should be aligned to the other major milestones already agreed in the industry calendar. I.e. 5MS	AEMO notes respondent's comment and refer to response in Table 10 item 1.

Table 11 MSATS Procedures: CATS

No.	Section	Consulted person	Issue	AEMO response
1.	N/A	AusNet Services	Why has the quick reference guide removed rather than updated?	Removed as a repeat of the table of contents.
2.	General comment	Energy Queensland	Ergon Energy and Energex have concerns that some customers may deliberately block access to meter readers to receive lower estimated bills and a new FRMP would have no visibility of this. As such, we suggest an allowance be made to stop a customer who has long term access issues, and has been billed from estimated reads for a long period (11 months or more), from transferring FRMP again on an estimate, or to stop repeated transfers on estimates.	AEMO notes that it is a retailer decision as to whether a transfer should go ahead on substitution based on discovery of previous read dates and quality flags. AEMO notes that we will be providing nulls for some customers if AEMO doesn't have the data (eg, 1 st tier in some distribution areas).
3.	General comment	Energy Queensland	Ergon Energy and Energex note the MDP has an obligation under the CATS procedure to object and notify the winning Retailer where there is a LARGE site with basic metering before the objection is lifted. It is unclear if this obligation be will removed for both the objection and the notification in this example.	AEMO notes that the CATS procedures do not have an objection for a transfer CRC that must be raised where there is a LARGE site has basic



No.	Section	Consulted person	Issue	AEMO response
				metering.
4.	Effective Date	Energy Queensland	As noted above, Ergon Energy and Energex believe that the proposed implementation date of May 2020 is too soon to incorporate design, code changes, User Acceptance Testing, and market trials, etc., particularly as the consultation will not be finalised until February 2020. This is a significant change to the current transfer process for an MDP, and introduces new CRs that the MDP has to provide. We suggest that November 2020 is a more appropriate implementation date that would align to normal MSATS release schedules and still allow a reasonable lead time.	AEMO notes respondent's comment and refer to response in Table 10 item 1.
5.	2.1.(e)(ii)	Energy Queensland	As an LNSP, we currently object to a CR6801 if no NOMW has been provided matching the Actual Change Data. However, a NOMW is not a mandatory Market transaction, so it is unclear if AEMO would consider this an invalid reason to Object under these proposed new rules. Further, we would object to a CR6801 if the Actual Change Date on the CR did not align with the read date of the NOMW. We seek clarity as to whether this is also a valid objection.	No obligation in CATS procedure to enable this objection to stop role change or the change date.
6.	2.1.(e)(ii)	PLUS ES	PLUS ES proposes to omit the inserted wording which oblige a participant to produce evidence to AEMO to substantiate the raising of an Objection Code as fair and reasonable within one business day of a request by AEMO. This action could be considered excessive, as: <ul style="list-style-type: none"> • Current processes exist between participants to provide resolution to raised objections • AEMO has existing audits in place to review the participants processes • The timeframe suggested is not realistic to allow the reviewing and provisioning of such evidence • The proposed changes of removing the objections for FRMP churns do not justify the above inclusion. 	AEMO believes that the proposed insertion is important to ensure compliance with the CATS Procedures for all roles.
7.	2.2	Endeavour Energy	We suggest that a new clause be added as follow. Please see our response to question 22 for more detail: "The Current FRMP must obtain prior agreement from the Initial MC prior to raising a change request to revert the MC role back to the Initial MC"	AEMO notes this is not supported by requirements in NER. AEMO is allowing for reasonable objections in certain scenarios. AEMO will not be requiring this in the CATS Procedure.
8.	2.4.i	Endeavour Energy	This clause is not clear on what needs to be provided to the New FRMP, given that the New FRMP has access to CATS Standing Data via NMI Discovery. We suggest that this clause be	The clause covers the provision CATS Standing Data items that



No.	Section	Consulted person	Issue	AEMO response
			clarified or deleted if redundant	may not be populated in MSATS, hence, the new FRMP cannot access the data via NMI Discovery.
9.	2.4.(k)	Evoenergy	Move to 2.4.(h) and reword this clause to apply to all MDP's for further clarity. (h) Provide metering data for both the period before and the period after the completion of the transfer for the periods they are responsible.	Clauses apply separately to new and current MDPs. Current MDP is based on the relevant time period.
10.	2.4.m	Endeavour Energy	We believe that the word 'or' should be 'and' in this sentence, and for better clarity we suggest the words 'Proposed Date' be replaced with 'Actual Change Date'	AEMO confirms that this should be 'or'. The clause reads as 'If you don't 1500 OR there is no actual read, then you provide substitute'.
11.	2.4.(m)	Energy Queensland	Throughout these changes AEMO has used the term 'estimate' rather than 'substitution' when referring to the read required to facilitate a transfer. However, a transfer does not go COM until on or after the proposed date. Therefore, we seek clarity as to whether the expectation is that the MDP would use an "E" reading type, as opposed to "S" reading type, when currently on a BASIC Type 6 meter an "E" read type would normally only be used for a future estimate.	Agreed, AEMO will change the term 'estimate' to 'substitution'. AEMO confirms, as per the MDP SLP, the use of substitution 'S' for transfer date to previous FRMP, new FRMP and then the MDP provides forward estimates from that date to new FRMP/AEMO.
12.	2.4.(m)	Evoenergy	Reword this clause or remove the reference to "Proposed Date" as it puts all the obligations on the MDP, and no responsibility on the retailer to use reasonable dates, allowing them to submit any date for a transfer. (m) For a Type 4A, 5 or 6 meter, where a Data Request has not been received or the Proposed Date does not align with an actual read date for read type code SP, then an estimated reading must be provided upon completion of a retail transfer.	AEMO notes that Proposed Date must be in the transfer CR. The wording on this clause has been updated.
13.	2.4.r	CitiPower Powercor	CitiPower Powercor recommends that the explanation be expanded to explicitly state that smart meters that provide daily data are excluded from this obligation as this would lead to huge volumes of CRs sent to market and subsequently resulting in Stop files.	AEMO notes that 2.4.r has been removed.
14.	2.4.r	Endeavour Energy	It should be made clearer that any last read that is substituted (for whatever reason including a retail transfer) should also trigger the need to update these new two fields. We	AEMO notes that 2.4.r has been



No.	Section	Consulted person	Issue	AEMO response
			suggest rewording this clause to: "For metering installations that are manually read, update the Last Read Date and Last Read Quality Flag within two business days of a meter being read or the last read being substituted or last read been updated."	removed.
15.	2.4.(r) (Deleted)	Evoenergy	Disagree. Why have more large volumes of transactions. Should be MSATS that derives the date from the data sent by the MDP. In the long term, all meter data will get sent to MSATS, so the system will have everything it needs to provide these values.	AEMO notes that 2.4.r has been removed.
16.	2.4.(r)	United Energy	United Energy recommends that the explanation be expanded to explicitly state that smart meters that provide daily data are excluded from this obligation as this would lead to huge volumes of CRs sent to market and subsequently resulting in Stop files.	AEMO notes that 2.4.r has been removed.
17.	2.6.i	Endeavour Energy	This clause is not clear on what needs to be provided to the New FRMP, given that the New FRMP has access to CATS Standing Data via NMI Discovery. We suggest that this clause be clarified or deleted if redundant	AEMO refers to response in Table 11 item 8.
18.	3.1.d	Endeavour Energy	We suggest that this clause be moved to the Glossary as it is defining the terms 'Current' and 'New'	AEMO has updated the Glossary for the terms NEW & CURRENT to refer to section 2.11 rather section 3.3.
19.	3.5 (a) (v)	CitiPower Powercor	3.6.1 and 3.6.2 remove reference to "At present, the maximum number of days in the past for any Role Change Request is 130 business days, the maximum number of days in the past for changing NMI Standing Data is 140 business days" and only leave a generic statement in 3.5. CitiPower Powercor recommend updating 3.5 to include "At present, the maximum number of days in the past for any Role Change Request is 130 business days, the maximum number of days in the past for changing NMI Standing Data is 140 business days."	Clause is valid as each CR provides the prospective and retrospective dates.
20.	3.5 (a) (v)	United Energy	3.6.1 and 3.6.2 remove reference to "At present, the maximum number of days in the past for any Role Change Request is 130 business days, the maximum number of days in the past for changing NMI Standing Data is 140 business days" and only leave a generic statement in 3.5. United Energy recommend updating 3.5 to include "At present, the maximum number of days in the past for any Role Change Request is 130 business days, the maximum number of days in the past for changing NMI Standing Data is 140 business days."	Refer to response in Table 11 item 19.
21.	Table 4-A	AusNet Services	Does this replace the reference guide removed earlier in the document?	Yes
22.	Table 4-A	Endeavour Energy	We disagree with the deletion of CR1010. Please see our comments to question 6 for more detail.	Refer to response in Table 1 item 2.



No.	Section	Consulted person	Issue	AEMO response
			Also we note that AEMO is proposing that CR1023 be restricted to SMALL NMIs only. We believe that this should be applicable to all NMIs because it is not unreasonable for a large customer to initially sign up with a retailer and later change retailers prior to a metering installation being installed. Therefore we suggest that this restriction be removed.	CR1020 is not SMALL and can be used in this scenario. CR102X have always been for Small, CR1023 included.
23.	Table 4-A	Energy Queensland	We suggest CR1080 be removed as it is no longer valid in later sections of the document.	Agreed, AEMO has removed CR1080.
24.	4.2. Table 4-A	Evoenergy	Disagree with CR5072 as it will produce thousands of extra transactions through the market. Derive values within MSATS as all meter reads and meter data will be sent to MSATS. Need to set this up for a long term solution.	AEMO notes that CR5072 has been removed.
25.	Table 4-A	PLUS ES	PLUS ES recommends that CR1010 - Change Retailer is maintained as a retrospective CR and CR1000 remains a prospective CR for Change Retailer.	Refer to response in Table 1 item 2.
26.	4.7	Endeavour Energy	For the DECLINE objection code, we request that the below be added. Please see our response to question 22 for more detail: <ul style="list-style-type: none"> When the Initial MC is nominated for a greenfield NMI When the Initial MC is aware that the type 5 or 6 metering installation needs to be changed to a type 4 metering installation When the Initial MC did not approve the installation or alteration made to a type 5 or 6 metering installation 	Refer to response in Table 7 item 5.
27.	4.7	Endeavour Energy	We suggest that a new objection code, for example NOSORD, be made available to allow a MDP to raise if a change request with a SP Read Type Code was raised and a corresponding service order is not received prior to or on the same day as when the change request was raised. This would allow the MDP to communicate to the New FRMP that the change request cannot complete because they have not yet raised a corresponding service order. This will help to facilitate a faster transfer and reduce manual enquires about the status of the transfer.	AEMO notes that that the proposed changes are outside the scope of this consultation. Endeavour Energy may wish to submit an ICF to facilitate further consideration of this change.
28.	4.7	Endeavour Energy	We suggest that a new objection code, for example NOREAD, be made available to allow a MDP to raise if a change request with a SP Read Type Code was raised and the MDP was unable to obtain an actual meter reading for all meters, beside for the reason of no access. This could be used for scenarios like one of the meter was faulty or the type 6 meter has been replaced. This would allow for better communication on why an actual read could not be obtained and allow retailers to make better decisions on their next step.	AEMO notes that that the proposed changes are outside the scope of this consultation. Endeavour Energy may wish to submit an ICF to facilitate further consideration



No.	Section	Consulted person	Issue	AEMO response
				of this change.
29.	4.7(a)	PLUS ES	PLUS ES recommends that the latter half of the clause is omitted as it is a duplication/reiteration of Clause 2.1(e) (ii)	AEMO has chosen to be specific on Clause 4.7(a) and remind participants of their obligations.
30.	4.12 (b)	CitiPower Powercor	CitiPower Powercor believes the "Manually Read Flag" construct no longer works given only a read type code of SP triggers an Actual Change Date. We recommend removing this clause and the 'Manually Read Flag' column from Table 4-L.	Agreed. The Manually Read Flag is associated with sending of RDAT. AEMO will delete clause (b) and the column in Table 4-L.
31.	4.12 (b)	United Energy	United Energy believes the "Manually Read Flag" construct in this clause no longer works given only a read type code of SP triggers an Actual Change Date. We recommend removing this clause and the 'Manually Read Flag' column from the Table 4-L.	Refer to response in Table 11 item 30.
32.	4.13	Endeavour Energy	<p>The Read Type Code of PR:</p> <ul style="list-style-type: none"> This does not align with what is stated in the issues paper. The issues paper suggests that PR will not be available but the draft procedures suggests that PR is available. Please clarify the intent. <p>The Read Type Code of RR:</p> <ul style="list-style-type: none"> Should be worded to allow for an actual read to be used if the actual read date aligns with the Actual Change Date Suggests that it could be used for both prospective and retrospective. This seems to contradict the intent of having PR. Please clarify the intent. It is unclear if for a retrospective scenario whether the MDP is required to generate a substitution if a read is not available on the Actual Change Date. Please clarify the intent. It does not put any restriction for a move-in scenario, which should only allow a retail transfer on an actual read. This restriction should be made clearer and more explicit. <p>The Read Type Code of SP:</p> <ul style="list-style-type: none"> It should be made clearer that the service order must be raised prior to or on the same day that the change request is raised. Alternatively, this could also be spelt out in clause 2.2 <p>Note that we have suggested that existing Read Type Code should not be redefined but</p>	<p>AEMO notes that there was change between the Issues Paper and the draft CATS Procedure publication.</p> <p>PR can be used for manually read meters, whereas RR can be used for prospective and retro for remote read metering.</p> <p>AEMO notes comments regarding SP and the associated Service Order.</p> <p>AEMO has not proposed changes to the process for using SP.</p>



No.	Section	Consulted person	Issue	AEMO response
			instead new ones be created. Please see our response to question 6 for more detail	
33.	4.13 (b)	CitiPower Powercor	<p>CitiPower Powercor believes this clause is not stated correctly as the service order is sent by the FRMP to the LNSP.</p> <p>We propose the clause be updated to: <i>'Where a Special Metering Reading has been requested, advice is provided to a MDP by the read type code in the CR, the MDP will utilise the Special Meter Reading date once the read is received upon completion by the LNSP of the service order request from the FRMP'.</i></p>	AEMO notes that MDP role takes reading, not LNSP. This is even the case where a distributor performs the service order field work.
34.	4.13.(b)	Evoenergy	<p>Current wording is not clear, and also duplicated in the table.</p> <p>Suggest rewording to:</p> <p>Where a Special Metering Reading has been requested, the New FRMP must send a B2B ServiceOrderRequest for the Special Meter Reading to be undertaken.</p>	Agreed AEMO will remove 'ing'. AEMO does not see the need to change the rest of the wording as it has the same meaning as what has already been drafted.
35.	4.13 (b)	United Energy	<p>United Energy believes this clause is not stated correctly as the service order is sent by the FRMP to the LNSP.</p> <p>We propose the clause be updated to: <i>'Where a Special Metering Reading has been requested, advice is provided to a MDP by the read type code in the CR, the MDP will utilise the Special Meter Reading date once the read is received upon completion by the LNSP of the service order request from the FRMP'.</i></p>	Refer to response in Table 11 item 34.
36.	4.13 (c)	PLUS ES	<p>Recommend:</p> <ul style="list-style-type: none"> • a ':' or ';' after the word 'example' and • Lowercase 'a' for A special Read Date (SP) 	The wording on this clause has been updated.
37.	Table 4-M	AusNet Services	<p>AusNet Services considers the removal of ER Read Type Code is unnecessary, adds to the overall cost of this change and would break the ROLR process which refers to it. If AEMO wants to change it, the scope of the Consultation must include the ROLR process.</p> <p>We have no problem with retailers changing to use the Read Type Code RR instead, but removing it would require system changes and hence adds no value to customers.</p>	AEMO notes that the Read Type Code is not involved in invoking RoLR.
38.	Table 4-M	AusNet Services	<p>AusNet Services considers the removal of EI Read Type Code is unnecessary and adds to the overall cost of this change. AusNet Services and retailers use this code today for Vic AMI meters and it works well. We have no problem with retailers changing to use the Read Type Code RR instead, but removing it would require system changes and hence adds no value to customers.</p>	AEMO have chosen to retain Read Type 'EI' to reduce system change where the outcome is the same. Both EI and RR will have the same functionality,



No.	Section	Consulted person	Issue	AEMO response
				with EI restricted to 1-4 Metering Installations. There is no obligation to use EI when there is a 1-4 Meter at the connection point, either EI or RR could be used. There will be no objection available should the Customer Switch include a Type 5/6 meter and EI is nominated.
39.	Table 4-M	CitiPower Powercor	The description of the code SP (Special Read) states 'The MDP/MPC is to arrange for the Special Meter Reading'. CitiPower Powercor recommends this be reworded to ' <i>the MDP utilises the read from the service order</i> '.	AEMO notes that the MDP has to organise to have SP scheduled.
40.	Table 4-M	Energy Queensland	It is unclear what standard Read Type Code a FRMP should use to transfer a COMMS NMI, given the removal of the EI Read Type Code.	AEMO have chosen to retain Read Type 'EI' to reduce system change where the outcome is the same. Both EI and RR will have the same functionality, with EI restricted to 1-4 Metering Installations. There is no obligation to use EI when there is a 1-4 Meter at the connection point, either EI or RR could be used. There will be no objection available should the Customer Switch include a Type 5/6 meter and EI is nominated. Table 4-M has been improved to provide clarity in conjunction with Table 4-N.
41.	Table 4-M	Energy Queensland	We suggest that if a read does not exist on the Proposed Date for a PR transfer, then the MDP may object with DATEBAD. However, we note that under the proposed new rules, that read could be of any type (actual, substitution or final).	AEMO is including validation rules to cater for this checking if a read exists on the Proposed



No.	Section	Consulted person	Issue	AEMO response
				Date for a PR. PR will only apply for CR1010s.
42.	Table 4-M	Energy Queensland	We seek clarity on whether the MDP should retrospectively create a substitution for the date if a CR1000 is raised with an RR Read Type and the Proposed Date is retrospective, but no read exists on that date. A possible alternative may be for the MDP to object with DATEBAD.	Yes, a substitution read should be provided by the MDP. AEMO notes there will be no MDP objection available for remotely read meters.
43.	4.13. Table 4-M Code RR	Evoenergy	The new wording for point 1 is difficult to read. Suggest rewording to below: Advice from New FRMP to Current MDP either that: (1) The Proposed Change Date, that will become the Actual Change Date for the End User transfer, is to be the date the for provision for of the interval meter reading or Estimated Reading, as appropriate, on that Proposed Date. The Proposed Change Date will become the Actual Change Date of the End User transfer.	The wording on this clause has been updated.
44.	4.13. Table 4-M Code SP	Evoenergy	The new wording for point 1 is difficult to read, and was duplicated in (b) above. Suggest rewording to below: Advice from New FRMP to Current MDP that a B2B ServiceOrderRequest has been/will be provided to arrange for a physical site visit to undertake a reading including but not limited to, facilitation of facilitate an End User transfer.	The wording on this clause has been updated.
45.	Table 4-M EI – Existing Remotely Read Interval Meter	PLUS ES	PLUS ES recommends that the 'EI' read type code is maintained: <ul style="list-style-type: none"> • It easily identifies what type of data is required and for which metering • It does not impact Customer Switching and • It is already available and requires no additional changes where as if the functionality is embedded in the RR, additional work will be required to decommission the functionality as well as build the additional logic. Furthermore, PLUS ES (MDP) is supported by multiple systems and the 'EI' Read Type Code allows us to differentiate contestable metering.	AEMO have chosen to retain Read Type 'EI' to reduce system change where the outcome is the same. Both EI and RR will have the same functionality, with EI restricted to 1-4 Metering Installations. There is no obligation to use EI when there is a 1-4 Meter at the connection point, either EI or RR could be used. There will be no objection available should the Customer Switch include a Type 5/6 meter and EI is



No.	Section	Consulted person	Issue	AEMO response
				nominated.
46.	Table 4-M RR – Read Required	PLUS ES	<p>PLUS ES recommends that this Read type code is applicable to Type 4a, 5 and 6 metering installations. Otherwise, a lengthy and extensive logic needs to be applied to this.</p> <p>Additional rules/parameters should be in place for the:</p> <ul style="list-style-type: none"> • Prospective Change Date, i.e. within what timeframe? • Retrospective Change date, i.e. no later than an actual read 	AEMO notes that the Read Type RR will be available for all metering types for prospective transfers. For retrospective transfers, RR will only be available for remotely read meters and all manually read meters will be able to use CR1010.
47.	Table 4-M SP– Special Read	PLUS ES	<p>PLUS ES recommends the removal of the wording ‘will be’ so that the sentence reads: <i>Advice from New FRMP to MDP that a B2B Service Order has been provided...</i></p> <p>As an MDP, PLUS ES should be able to object if a B2B SO has not been received within ‘x’ hours of receiving a CR10XX.</p>	AEMO notes that a service order can be raised after CR has been raised and that the proposed changes are outside the scope of this consultation. PLUS ES may wish to submit an ICF to facilitate further consideration of this change.
48.	Table 4-M – Read Type Codes	United Energy	The description of the code SP (Special Read) states ‘The MDP/MPC is to arrange for the Special Meter Reading’. United Energy recommends this be reworded to <i>‘the MDP utilises the read from the service order’</i> .	Refer to response in Table 11 item 39.
49.	Table 4-N	AusNet Services	AusNet Services do not support the proposed changes to the table of valid combinations of Read Type Codes, Metering Installation Type Codes and Change Reason Codes. These changes are unnecessary and would result in significant system and process change. Our response to question 22 in the issues paper outlines broader concerns with the removal of objection codes.	AEMO notes the respondent’s comment and refers to the response in Table 7 item 3.
50.	4.13. Table 4-N	Evoenergy	Where does the new CR codes 1060 & 1061 fit into this table?	AEMO notes that CR1060 and CR1061 do not require a Read Type Code, hence, they do not belong within Table 4-N.
51.	4.14	Endeavour Energy	We suggest that a quality flag hierarchy be defined for when the metering data has multiple	Section 4.14 will refer to the



No.	Section	Consulted person	Issue	AEMO response
			<p>quality flags on the date of the last read. We suggest that the hierarchy be, in order of what should be populated if the metering data has one of these flags:</p> <ul style="list-style-type: none"> • S • F • A <p>Note that we have suggested alternative options for these two fields. Please see our response to question 11 for more detail.</p>	Metrology Procedure Part B for the quality flags.
52.	4.14 (Deleted)	Evoenergy	Disagree. See comments above for 2.4.(r) and 4.2. Table 4-A and answers to question 27. Need long term solution that reduces market transaction volumes, with a number of participants having regular stop files now after POC.	AEMO notes that the MDP is no longer updating Last Read Date and refers to response in Table 8 item 26.
53.	4.14 (b)	CitiPower Powercor	The table reference in this clause is incorrect, it should reference 4-O.	The table has been removed and a reference to Metrology Procedure Part B for the quality flags inserted.
54.	4.14 (b)	PLUS ES	Typo: Table 4-M should read Table 4-O	Refer to response in Table 11 item 53.
55.	4.14 (b)	United Energy	The table reference in this clause is incorrect, it should reference 4-O.	Refer to response in Table 11 item 53.
56.	4.17 (a)	PLUS ES	<p><i>From time to time....</i></p> <p>This is a vague statement. PLUS ES suggests rewording to: <i>AEMO will update the following codes and rules tables in MSATS, as required:</i></p>	The wording on this clause has been updated.
57.	6.1. 1000 – Change Retailer	Evoenergy	<p>Wording for these need a change to read better. Change to:</p> <p>Prospective Day – a date as nominated...</p> <p>Retrospective Day – the date of the...</p>	The wording on this clause has been updated.
58.	6.1	PLUS ES	<p>PLUS ES strongly recommends that:</p> <ul style="list-style-type: none"> • CR1000 – is maintained for prospective retailer changes and • CR1010 – is maintained for retrospective <p>The proposed changes will greatly impact the logic and processes of current systems for the same results.</p>	Refer to response to Table 1 item 2.



No.	Section	Consulted person	Issue	AEMO response
59.	6.3	Endeavour Energy	It should be made clear that CR1030 (move-in) must have a Read Type Code of SP only. This is based on the principle that a move-in can only occur on an actual read. In addition, we suggest that AEMO update MSATS to validate this.	Table 4-N has been updated and includes CR1030 on a SP.
60.	6.3 (b) – MC (RP) role	PLUS ES	<ul style="list-style-type: none"> Provisioning the MC role in the CR10xx should not impact the customer switching. This should be maintained. MC objections are very low in volume and AEMO should restrict the objections to the minimum impact scenarios. 	AEMO has included the nomination of the MC role only in the CR10xx but has removed the objections.
61.	6.3 (b) – Read Type code	PLUS ES	<p>PLUS ES proposes that the service order ID should be provided when the Read Type Code = SP. This will ensure that the SO has been raised and deliver a more efficient and timely process.</p> <p>Failure to provide a B2B SO will:</p> <ul style="list-style-type: none"> Result in additional resourcing to follow up as per section 6.4 MDP requirements (b) (ii) and Possibly cause delays to the FRMP churn completion and processes 	Refer to response to Table 11 item 47.
62.	6.4	Energy Queensland	Ergon Energy and Energex seek to understand the reasoning for the removal of the ability for the MDP to object if the Read Type does not match the Metering Schema Type. It appears that if a UM Read Type is proposed on a COMMS NMI, or an SP Read Type on a COMMS NMI, there would not be a requirement to be able to object, as the FRMP is clearly not aware of the customer's metering.	Table 4-N has been improved to confirm application and use. Validation of Meter Type does not currently exist and is no longer applicable.
63.	6.4	Energy Queensland	Ergon Energy and Energex seek clarity as to whether an Actual Change Date on a CR must correspond to an actual read date in the MDP's system, or whether there are instances where an MDP would need to estimate a read for an Actual Change Date.	AEMO notes there are instances where the MDP will need to provide a substitute for the Actual ChangeDate once the CRC has completed.
64.	6.4.(b)(i)	Evoenergy	This dot point should say "...two business days..." to align to actual practice of validating and distributing the reads.	The wording on this clause has been updated.
65.	6.4.(b)(i)	PLUS ES	PLUS ES proposes rewording to: '...within two business days...'. The word 'business' is currently missing.	The wording on this clause has been updated.
66.	6.4.b.ii	Endeavour Energy	We suggest that if the MDP is unable to obtain an actual reading then an objection is raised (see our feedback to clause 4.7 suggesting a new objection code). This will allow for better communication and quicker decision making by the retailer on the next step rather than receiving this information via other channels like email or phone calls.	Refer to response in Table 11 item 28. AEMO also notes that the NOACC objection still available.



No.	Section	Consulted person	Issue	AEMO response
67.	6.4(b)(ii)	Energy Queensland	The change to the SP Read Type appears to have removed any link between the date on the B2B request for an SP read and the CR1000 SP Proposed Date, as it now requires the transfer date to be linked to the Special Read Date not the CR Proposed Date. Under the current B2B procedures and Queensland jurisdictional regulations, the LNSP is not obligated to read a meter exactly on the Special Read date. There is an obligation period only – with a -3+2 day window. This new clause seems to have removed any reference to that -3+2 day window and as such, we believe this would require changes to both the B2B procedures and Queensland jurisdictional regulations. We do not support any change in the current B2B timing requirements resulting from this proposal. If the Special Read must only be taken on the Proposed Date, then we suggest there should be a clause that states the CR1000 Proposed Date must match the proposed Special Read Date.	SP is unchanged and the B2B requirements remain unchanged. AEMO has updated the wording of the clause.
68.	6.4.c	Endeavour Energy	This clause should make it clearer that if an actual read exists for the Actual Change Date then the actual reading should be used	AEMO have improved the definition of RR to support this.
69.	6.5	Endeavour Energy	We suggest that the objection logging period be 1 day when the Read Type Code is SP. This is to allow for the MDP to raise an objection when there is no corresponding service order (see our feedback to clause 4.7 suggesting a new objection code), with an objection clearing period of 0 days	AEMO notes NOACC does not have a logging period. In addition, AEMO refers to response in Table 11 item 28.
70.	6.5	Endeavour Energy	We wish to highlight that the prospective period is still 65 days, which does not seem to align with the intent of a fast transfer. Please clarify the intent.	AEMO has retained the existing 65 business day prospective period, for prospective customer switches. AEMO has not proposed for this to change at this time, although it is acknowledged that the timeframe was most likely originally determined to accommodate at least one full quarterly reading cycle (typically 62-63 business days). AEMO considers that reducing this timeframe is unnecessary, however, it is reasonable to consider that few, if any switches will be scheduled this



No.	Section	Consulted person	Issue	AEMO response
				far in the future following implementation of the proposed changes. This timeframe can be reviewed, and, if necessary, reduced upon review of customer switching practices in the future.
71.	6.5 – Table 6-A	PLUS ES	As per PLUS ES' earlier proposal: <ul style="list-style-type: none"> If CR1000 remains prospective – remove the 15 bus days from the Retrospective Period 	Refer to response to Table 1 item 2.
72.	Table 6A	Energy Queensland	Ergon Energy and Energex understand the objection logging period on a CR1000 has been removed. We seek clarity as to whether this is because the only valid objection now is a NOACC which can be raised at any time, regardless of the objection logging period. Further, clarity is required from AEMO as to whether NOACC is now only applicable to the SP Read Type.	Correct
73.	6.6	PLUS ES	As per PLUS ES earlier proposal, if accepted, retain CR1010 table	Refer to response to Table 1 item 2.
74.	6.6 Table 6-B	CitiPower Powercor	CitiPower Powercor seek clarification on Table 6-B and the use of the NOACC objection, is it correct to assume this is now only valid for SP read type transfers?	Correct, NOACC can be used for SP for CR1000 or any read type code for CR1030/1040.
75.	Table 6B	Energy Queensland	As an LNSP, DNSPs have the ability to object to new FRMPs, using the NOTAPRD code. We have to approve all new Retailers before they can operate within our distribution network area, and this includes ensuring the FRMP has completed a New Retailer Application and operates in accordance with the Default Co-ordination Agreement, which is an annexure to Queensland's Electricity Distribution Network Code. We object to the removal of the NOTAPRD code as it would allow a non-approved Retailer to sign up a customer and we would have no way of reversing the transfer. Similarly, as LNSP we require to be informed at the REQ stage of a CR1000 series transfer in order to facilitate this objection.	AEMO note this is a business process and not an MSATS procedural matter.
76.	6.6 Table 6-B	United Energy	United Energy seek clarification on Table 6-B and the use of the NOACC objection, is it correct to assume this is now only valid for SP read type transfers?	Refer to response in Table 11 item 74.
77.	6.7	Energy Queensland	We suggest there is a possible error in this table as the current FRMP would need to be informed that the CR1000 had gone COM and under the proposed changes they would not be aware they have lost the customer.	The wording on this table has been updated.



No.	Section	Consulted person	Issue	AEMO response
78.	6.7	PLUS ES	<p>PLUS ES strongly supports that the notifications to the current MPB and the MC should remain.</p> <p>Maintaining the notifications will:</p> <ul style="list-style-type: none"> • Not impact the Customer Switching objective – reducing the timeframe • Provide visibility to market actions with respect to the metering service works. i.e. mitigating occurrences of actioning a B2B SO requested by a losing retailer. • Deliver a more efficient process for the MSPs • Mitigate redesign of business and system processes, i.e. lower costs 	AEMO notes that the notifications do not deliver the ACCC recommendation to eliminate 'save' activities.
79.	6.7	PLUS ES	As per PLUS ES' proposal to maintain the nomination of MC in the CR10xx series, if accepted the 'New' RP should also get the notifications.	Refer to response to Table 11 item 78.
80.	7 Reverse Change Request	PLUS ES	PLUS ES recommends retaining CR1026, with redesign aspects, as required, in favour of creating new CRs.	AEMO notes respondent's comment. AEMO has proposed to create the new CRCs.
81.	7 Reverse Change Request	PLUS ES	PLUS ES recommends that this section moves down one section to allow for numeric ascending order of the CRs- as per current format of the CATS document. i.e. CR 1060/61 should move below section 8 which defines CR102X series.	AEMO has created the sections based on process order rather than CRC numerical order.
82.	7 Reverse Change Request	PLUS ES	Recommend that the title of this section identifies that it is only for Small. i.e. Reverse Change Request – Small	AEMO notes that the reverse change request does not only apply to small as cooling off rules apply to whomever is in the Rules.
83.	7.3.(a)	Evoenergy	Appears to be missing a space after CR1060. Please check.	The wording on this clause has been updated.
84.	7.4	Endeavour Energy	For clarity, we believe there are benefits in describing the validations that will be performed by MSATS, for example will the Proposed Change Date for CR1060 be validated to align with the Actual Change Date of the Related Change Request?	Note this is a technical function of the system and should not sit in the procedures, but we have noted it for consideration with technical information.
85.	7.4	Energy Queensland	It is unclear whether MSATS will complete a validation on the contents of a CR1060, including checking the Previous FRMP, Proposed Change Date and Change Request ID are valid and match the previous transfer that this is correcting. If this is not the case, then we believe that the MDP should be allowed to object where those values are incorrect. Further,	Note this is a technical function of the system and should not sit in the procedures, but we have noted it for consideration with



No.	Section	Consulted person	Issue	AEMO response
			it is unclear if the MDP is also expected to create a historic estimate where a read does not exist on the Proposed Date. We suggest AEMO also clarify if the Read Type Code in this transaction has any bearing on the process, as we believe it should be a reversal of a previous transfer. The draft procedure does not include a table specifying the valid values of the Read Type Code for this transfer type.	technical information. Read type code has been removed as a field from this CR.
86.	7.4	Energy Queensland	It is unclear how a new FRMP will know who the previous FRMP is for completing a CR1060, as it is not a value available in NMI Discovery. For example, if a customer was with Origin, it is unclear whether the FRMP know which specific Origin participant that was.	AEMO has modified data required to be populated by the initiating FRMP.
87.	7.4	PLUS ES	Provisioning the MC role in the CR10xx should not impact the customer switching. This should be maintained. MC objections are very low in volume and AEMO should restrict the objections to the minimum impact scenarios.	AEMO notes respondent's comments and refer to response in Table 11 item 60.
88.	7.4.(b) 8.2.(d) 8.4.(e)	Evoenergy	What Read Type Code is valid? You are doing a reversal here so why have it in there to complicate the transfer? Don't think this is a valid requirement to have this as a mandatory field, or included at all. Consider removing please.	AEMO notes the reversal (7.4(b)) does not require Read Type Code and refer to the response in Table 11 line 86. AEMO notes 8.2(d) and 8.4(e) are error corrections and require read type code.
89.	7.5 Table 7-A	Evoenergy	Point (a) says "...Actual Change Date in the previously Completed Change Request is not greater than the period shown in Table 7-A". You have allowed CR 1000 transfers where the retrospective read date was 15 business days, but here you are only allowing retrospective of 10 business days from the Actual Change Date to get reversed. This is not clear and seems to refer to the Actual Change Date but are you referring to the "Last Update Date". Can this get clarified, or aligned to CR1000?	The wording on clause 7.5(a) has been updated.
90.	7.7	PLUS ES	PLUS ES strongly supports that the notifications to the current MPB and the MC should remain. Maintaining the notifications will: <ul style="list-style-type: none"> • Not impact the Customer Switching objective – reducing the timeframe • Provide visibility to market actions with respect to the metering service works. i.e. mitigating occurrences of actioning a B2B SO requested by a losing retailer. • Deliver a more efficient process for the MSPs 	AEMO notes respondent's comments and refer to response in Table 11 item 78.



No.	Section	Consulted person	Issue	AEMO response
			<ul style="list-style-type: none"> Mitigate redesign of business and system processes, i.e. lower costs 	
91.	7.7	PLUS ES	As per PLUS ES' proposal to maintain the nomination of MC in the CR10xx series, if accepted, the 'New' RP should also get the notifications.	AEMO notes respondent's comments and refer to response in Table 11 item 79.
92.	8 Change Retailer – Error Corrections – Small NMIs	PLUS ES	Recommend that this section moves up one section to allow for numeric ascending order of the CRs- as per current format of the CATS document. i.e. CR 1060/61 should move below section 8 which defines CR102X series.	AEMO notes respondent's comments and refer to response in Table 11 item 81.
93.	8.4	PLUS ES	Provisioning the MC role in the CR10xx should not impact the customer switching. This should be maintained. MC objections are very low in volume and AEMO should restrict the objections to the minimum impact scenarios.	AEMO notes respondent's comments and refer to response in Table 11 item 60.
94.	8.8	PLUS ES	Clarification sought: The inclusion of roles in the CR10XX have been removed. The objection rules tables have current and new roles being able to object. How would they get the 'new' get the notification to object if they have not been nominated in the CR?	AEMO notes respondent's comments and refer to response in Table 11 item 79. AEMO have updated clause 8.8.
95.	8.9	PLUS ES	PLUS ES propose, if 'New' or 'Current' roles can object they should also receive notifications. i.e. New MDP and Current MDP can object but only Current MDP receives notifications Please see prior note for section 8.8 Objection Rules.	AEMO notes respondent's comments and refer to response in Table 11 item 79. AEMO have updated clause 8.9.
96.	8.9	PLUS ES	As per PLUS ES' proposal to maintain the nomination of MC in the CR10xx series, if accepted, the 'New' RP should also get the notifications.	AEMO notes respondent's comments and refer to response in Table 11 item 60.
97.	24. (Deleted)	Evoenergy	Need to reconsider as this will add large volumes of transactions. MSATS should derive these values to minimise this volume.	Section 24 removed as MDP no longer updating Last Read Date
98.	24	PLUS ES	<p>PLUS ES strongly opposes the use of the 5072 transaction. PLUS ES sending approximately 40,000 NSRD updates per day from their systems (CR5070), to add another transaction with the same volume is an error in architecture. PLUS ES supports the following efficiencies:</p> <ul style="list-style-type: none"> AEMO populate the Last Read Date and Quality flag from data delivered to AEMO systems. This process would be the most efficient for all industry participants. <p>Failing this, PLUS ES Recommends:</p>	Section 24 removed as MDP no longer updating Last Read Date



No.	Section	Consulted person	Issue	AEMO response
			<ul style="list-style-type: none"> The CR5070/5071 to be amended to include the last read date and quality flag as well as the NSRD. This would remove the requirement for the MDP to send double the volume of transaction to update the MSRD and the last read date/quality flag 	
99.	24.1	AusNet Services	CR to update last read date & Flag, suggest MSATS view last read date / flag if Current / New Retailer provides a NMI in MSATS	Section 24 removed as MDP no longer updating Last Read Date
100.	24.1 Application [5072]	AusNet Services	AusNet Services recommends that the explanation be expanded to explicitly state that this obligation doesn't extend to VIC AMI.	Section 24 removed as MDP no longer updating Last Read Date
101.	24.1 Application [5072]	CitiPower Powercor	CitiPower Powercor recommends that the explanation be expanded to explicitly state that this obligation doesn't extend to VIC AMI.	Section 24 removed as MDP no longer updating Last Read Date
102.	24.1 Application [5072]	United Energy	United Energy recommends that the explanation be expanded to explicitly state that this obligation doesn't extend to VIC AMI.	Section 24 removed as MDP no longer updating Last Read Date
103.	24.2(c)	AusNet Services	AusNet Services recommends that the explanation be expanded to explicitly state that this obligation doesn't extend to VIC AMI as these sites are not manually read and as the site has RWD we won't be providing the last read date.	Section 24 removed as MDP no longer updating Last Read Date
104.	24.2(c)	CitiPower Powercor	CitiPower Powercor recommends that the explanation be expanded to explicitly state that this obligation doesn't extend to VIC AMI as these sites are not manually read and as the site has RWD we won't be providing the last read date.	Section 24 removed as MDP no longer updating Last Read Date
105.	24.4	Energy Queensland	It is unclear why the MDP has been included as a field on this new CR given that only an MDP can raise it and the MDP must provide their Participant ID.	Section 24 removed as MDP no longer updating Last Read Date
106.	24.4.c	Endeavour Energy	<p>It should be made clearer that any last read that is substituted (for whatever reason including a retail transfer) should also trigger the need to update these new two fields. We suggest rewording this clause to:</p> <p>"Provide the Last Read Date and Last Read Quality Flag to MSATS within 2 days of reading the meter or the last read being substituted or last read been updated."</p>	Section 24 removed as MDP no longer updating Last Read Date
107.	24.2(c)	United Energy	United Energy recommends that the explanation be expanded to explicitly state that this obligation doesn't extend to VIC AMI as these sites are not manually read and as the site has RWD we won't be providing the last read date.	Section 24 removed as MDP no longer updating Last Read Date
108.	24.4.d	Endeavour Energy	The field called MDP is redundant and should be removed	Section 24 removed as MDP no



No.	Section	Consulted person	Issue	AEMO response
				longer updating Last Read Date
109.	24.4(d)	PLUS ES	Clarification sought: When the MDP populates 'Its Participant ID' and the 'MDP', isn't this requesting the same information twice?	Section 24 removed as MDP no longer updating Last Read Date
110.	24.7	CitiPower Powercor	'The Change Request Status Notification Rules for the Change Reason Codes identified in section 9.1 are specified in Table 24-B'. Section 9.1 links back to CR1500. CitiPower Powercor recommends this be updated to reference 24.1.	Section 24 removed as MDP no longer updating Last Read Date
111.	24.7	Endeavour Energy	We expect the volume of CR5072 to be similar to CR5071 and therefore, similar to the CR5071 notification rules, there should be no notifications for CR5072 either. Note that we have suggested alternative options for CR5072. Please see our response to question 11 for more detail.	Section 24 removed as MDP no longer updating Last Read Date
112.	24.7	United Energy	'The Change Request Status Notification Rules for the Change Reason Codes identified in section 9.1 are specified in Table 24-B'. Section 9.1 links back to CR1500. United Energy recommends this be updated to reference 24.1.	Section 24 removed as MDP no longer updating Last Read Date
113.	24.7 Table 24-B	CitiPower Powercor	CitiPower Powercor believes that not all the notifications are required by the MDP. Our preference would be to just receive the Completed change request.	Section 24 removed as MDP no longer updating Last Read Date
114.	24.7 Table 24-B	United Energy	United Energy believes that not all the notifications are required by the MDP. Our preference would be to just receive the Completed change request.	Section 24 removed as MDP no longer updating Last Read Date

Table 12 Meter Data File Format Specification NEM12 & NEM13

No.	Section	Consulted person	Issue	AEMO response
1.	Appendix E	Evoenergy	Agree to add new Reason Code 67 to clarify why the substituted reading was auto-generated.	AEMO notes the respondent's support for the proposed change.

**Table 13 Other matters**

No.	Consulted person	Heading	Issue	AEMO response
1.	AGL Energy	General Comments	AGL generally supports the approach proposed through the AEMC draft Rule and AEMO High Level Design (HLD) to reduce customer switching times. AGL agrees with the AEMC and AEMO that an efficient and seamless customer transfer process supports consumer choice, engagement and confidence in the retail market.	AEMO notes the respondent's support.
2.	EnergyAustralia	Expedite the smart meter rollout	EnergyAustralia believes the issues that the rule change is directed at addressing will be redundant once basic meters are replaced with Type 4 metering. We therefore propose if a special read for a transfer does not occur, this should trigger retailers to arrange for a smart meter to be installed. This will gradually accelerate the roll out of type 4 meters and reduce customer transfer times and meter reading issues in the future.	AEMO notes the respondent's comment.
3.	Energy Consumers Australia	General Comments	<p>Consumers are telling us that energy services are not affordable and that they are not value for money. Consumers do not have confidence and trust that the sector is working in their long-term interests. The price of energy has for many essentially doubled in the past 10-15 years, far exceeding wage growth and with extraordinary price spikes along the way, and is a root cause of the dissatisfaction we see coming through the Energy Consumer Sentiment Survey.¹ Making switching faster and easier is good for consumers and can increase the competitive pressure on retailers to deliver better and more affordable services.</p> <p>¹ https://energyconsumersaustralia.com.au/publications/energy-consumer-sentiment-survey-findingsjune-2019</p> <p>While we don't intend to comment on the detailed design implementation issues raised in the Issues Paper, we do support the intent of the proposed changes to the Market Settlement and Transfer Solutions (MSATS) Procedures. Specifically:</p> <ol style="list-style-type: none"> 1. Ensuring the switch can occur next day (or a day otherwise agreed with the customer), including retrospective transfers; 2. Removing the ability for the losing retailer to "save" the customer; and 3. Allowing the cooling off period to run in parallel with the transfer process. <p>We welcome the efforts of AEMO, and the Australian Energy Market Commission (AEMC), to facilitate a smoother, faster consumer switching process. We support the intent of the changes which we consider will help to deliver more transparent market processes and better consumers outcomes, ultimately increasing trust and confidence in market. We ask that AEMO continue to engage with the AEMC to ensure that there is ongoing focus on</p>	AEMO notes the respondent's support.



No.	Consulted person	Heading	Issue	AEMO response
			consumer protection and compliance matters that are beyond the scope of the current proposal to amend the MSATS Procedures.	
4.	Energy Consumers Australia	Consultation Process	We also want to commend AEMO on their efforts to engage the consumer advocate community in these important discussions, and to reduce the burden on advocates who wish to participate in such processes. Advocates are often willing, but unable to participate in processes given their limited resources. Providing alternative ways to engage, such as the ones used during this process, helps to ensure that the consumer voice can be clearly heard.	AEMO notes the respondent's support for the process.
5.	ERM Power	General Comments	<p>ERM Power does not support most of the changes that have been proposed by AEMO. It is our strong view that any changes proposed should not progress in the absence of thorough quantitative analysis conducted by AEMO that identifies net benefits. The changes are too broad and complex and the investment in system and process changes are too costly for AEMO to simply dismiss a call for a quantitative evaluation. It is our strong view that unclear issue identification, a lack of investigation of the costs and benefits, and rushed implementation, will lead to a poor outcome for consumers from this reform.</p> <p>We question the significance of transfer delays in driving this proposed considerable and costly overhaul of transfer systems, and the move to push estimated read based transfers for those customers that have do not have remotely read interval metering. This forces the outgoing retailer to generate a final bill based on an estimate reading without control of the outcome or costs imposed. We expect the industry will see an increase in estimated billing complaints stemming from these changes.</p> <p>Not only will significant system costs be required to unnecessarily modify transfers, billing and settlement processes, these reforms will distract our resources from other major projects that are currently underway, such as the changes to 5 minute and global settlements.</p>	AEMO's assessment is that the benefits of enabling customers to switch within two business days, thereby enhancing competition, are significant. A fundamental objective of the energy markets is efficiency in the long-term interests of consumers. AEMO's assessment is that the costs are minimised because, at a practical and technical level, the proposal utilises existing systems and interfaces and leverages current capabilities and processes. In a number of areas, the proposal provides an opportunity to significantly streamline processes.
6.	ERM Power	Consultation Process	AEMO's proposed transfer design has sought to broaden the scope of recommendation 9 of the Australian Competition and Consumer Commission (ACCC) Retail Electricity Pricing Inquiry (REPI) Final Report, without adequate evidence of market failure. We observe that the approach to this proposed reform has been conducted in a unique manner. Impacted participants have not been provided with a platform to question AEMO's High Level Design ('HDL') proposal. Specifically, whether the approach of dramatically altering the	AEMO's response is that neither advance notification to the losing retailer of a customer changing retailer, nor save activity by the losing retailer, are features of a well-



No.	Consulted person	Heading	Issue	AEMO response
			<p>customer switching process to be within a two-day time period, irrespective of metering arrangements is workable, sound, and for estimated-based transfers, to be in the customer's best interests. Instead, retailers have been constrained to make comments on selecting technical options to effect the changes, and not on the merit of the proposed changes themselves.</p> <p>It is our view, thorough and considered analysis should be undertaken and not be dismissed in favour of procedural and system changes which attempt to push reform through regardless of any cost benefit.</p> <p>ERM Power questions the urgency placed on this project by AEMO, that has warranted a condensed consultation period and rushed changes. We are also concerned that participants were not provided with the minimum required consultation timeframes as per the National Energy Rules to adequately review the proposed Procedure changes. The changes to MSATs and CATs Procedures are significant, and they are the substantial matter under consideration for this consultation. Unfortunately, the Procedure changes were provided to participants on the 1st November, which is a mere 15 business days before the submissions due date.</p> <p>We query the pressing urgency for this reform, given the perceived benefits are untested and are speculative in nature. Also, this is being rushed through at a time when the industry is under resource strain from the implementation of numerous other reforms that will have large system requirements, such as 5 minute and global settlements, and the raft of changes stemming from price reregulation and jurisdictional reforms.</p>	<p>functioning market. This view is consistent with the ACCC's recommendations in the Retail Electricity Pricing Inquiry (REPI) – Final Report, June 2018.</p> <p>The Determination states that the Final Amended CATS Procedure indicatively will come into effect on 2 December 2020. This timing allows AEMO to align the relevant schema changes with five minute settlement and global settlement. This timing also has the effect of extending the implementation timelines available to participants beyond 20 May 2020, which was the date on which AEMO had consulted during first stage consultation.</p> <p>AEMO's publication on 17 October 2019 of the First Stage Consultation Notice and the Issues Paper commenced its first stage consultation, under NER, on the proposal. AEMO published the Issues Paper to facilitate discussion and input on issues relating to the proposal. The Issues Paper focusses on clear objectives, contemplates various options, invites presentation of</p>



No.	Consulted person	Heading	Issue	AEMO response
				<p>additional options, and requests views as to any unintended adverse consequences. AEMO's subsequent publication of the Draft Amended CATS Procedure on 31 October 2019 is consistent with these decision-making requirements, as well as being consistent with AEMO practice. The Draft Amended CATS Procedure reflects potential solutions from among the various options, as articulated in the Issues Paper. AEMO has received a number of submissions as to the merits of the proposed changes themselves.</p> <p>AEMO refers to the response in Table 13 item 5 as to the issue raised concerning costs and benefits.</p>
7.	ERM Power	The principles to meet the objective of improving customer transfers	<p>ERM Power strongly contends that any amendments to the CATs and MSATs Procedures canvassed should seek to be implemented in a cautious and considered manner that ensures the long-term benefits to consumers consistent with the National Electricity Objective and Retail Objective upheld. Under the compressed timeframe, we have attempted to assess the Procedures, and consider the following to be of importance in determining whether these changes should progress:</p> <ol style="list-style-type: none"> 1. Net benefit tests are critical and should be undertaken 2. The urgency and timeframe for implementation should consider the magnitude of issues and other projects currently underway 	<p>AEMO's response is that the proposal will contribute to achievement of the NEO and NERO. By facilitating AEMO's high level design, the NER amendments are likely to improve the transfer process by removing outdated regulatory and administrative processes.</p>



No.	Consulted person	Heading	Issue	AEMO response
			<p>3. There should be no customer detriment</p> <p>4. Parties to market settlement and other wholesale costs should not be subjected to negative financial impacts from the use of an estimated final read transaction</p> <p>5. Changing Procedures that are currently working, for no added value, is a wasted cost</p> <p>6. Aspirations to adopt international reform platforms should be tested for merit and be cognisant of local market structure and conditions</p>	<p>The amendments in respect of the use of estimate reads for final bills and the amendment made to the model terms and conditions for standard retail contracts will increase transparency and certainty within the transfer process.</p> <p>The proposal also meets the "consumer protection test" of the NERO by strengthening the protections in the model terms and conditions for standard retail contracts relating to customer transfers.</p> <p>AEMO refers to the responses in Table 13 items 5 and 6 as to the other issues raised.</p>
8.	MEA Powershop	General Comments	<p>Powershop supports the intent of the changes proposed in the Paper. The proposed changes are proportional to those required to support the Australian Energy Market Commission's (AEMC) objective of 'Reducing customers' switching times (retail) draft rule determination'. Powershop believes the changes when fully implemented, will be positive for consumers and for competition in the industry. However, we note that the Energy and Water Ombudsman of NSW (EWON) 2018-19 Annual Report confirmed that EWON received only 375 complaints regarding a delayed transfer¹, compared with over 2,000 relating to estimate reads. Applying this customer sentiment to the significant system development required to execute this change effectively, Powershop does not believe the benefits outweigh the costs.</p> <p>In addition, the changes represent a significant industry shift. Consequently, the current proposed implementation time should be reviewed to allow market participants time to successfully upgrade and test their systems. Powershop suggests that AEMO defer the go live date from May 2020 to 1 October 2020, to ensure customers benefit from more</p>	<p>AEMO notes the respondent's support for the intent of the proposal.</p> <p>AEMO refers to the response in Table 13 item 5 as to the issues raised concerning costs and benefits, as well the response in Table 13 item 6 in regard to timelines.</p>



No.	Consulted person	Heading	Issue	AEMO response
			<p>efficient transfers. This would also reduce the risk of industry not being able to switch customers due to development constraints and unnecessarily tight delivery timeframes.</p> <p>¹ https://www.ewon.com.au/page/publications-and-submissions/annual-reports/2018-19 - page 29</p>	
9.	Momentum Energy	Support for Approach	<p>While we do not believe that the current switching arrangements are broken we generally support most of the changes which will enhance the customer switching process by reducing switching times and minimising the opportunity for retailer “saves” programs. The mandatory roll out of smart meters into Victoria has already significantly reduced switching times in this jurisdiction, but we acknowledge, this quantum step of improvement is unlikely to occur in other NEM jurisdictions, which are subject to competitive retailer lead transitions to utilising remotely read interval smart meters. Jurisdictions in the NEM, since the commencement of retail contestability, have experienced world leading customer churn activity via the current switching processes. Therefore we believe these proposed improvements should be implemented in an orderly cost effective manner that considers the impacts of other market and regulatory changes that are already scheduled for implementation in the next 12 to 18 months. There is a limit to the amount of system and process changes that a retail business can successfully implement without putting both compliance and customer service at risk.</p>	<p>AEMO notes the respondent’s overall support for the approach.</p> <p>AEMO refers to the response in Table 13 item 5 as to the issues raised concerning costs and benefits, as well the response in Table 13 item 6 in regard to timelines.</p>
10.	Origin Energy	Publishing estimated reads from current MC to new MDP?	<p>There appears to be a missing link of how reads such as estimates will be published from the current MC to the new MDP so that networks can issue correct network bills. Origin seeks clarification from AEMO on how estimated reads will be published.</p>	<p>MDPs are obligated to provide substituted reads to all parties who require it as per the MDP SLP.</p>
11.	Origin Energy	CR1080 – Retrospective?	<p>Will the 15-business day retrospective timeframe apply to CR1080 transaction?</p>	<p>AEMO note that CR1080 has been deleted as it was an Embedded Network specific CRC that duplicated other transfer CRCs.</p>
12.	Origin Energy	Removal of the error correction CRCs 1022, 1027 and 1028	<p>Can the CR1025/29 be used in place of the removed CR’s?</p>	<p>AEMO confirms that CR1029 can be used in the place of the removed error corrections CRCs.</p>



No.	Consulted person	Heading	Issue	AEMO response
13.	Origin Energy	MRAM Meter and costs of reading them off cycle	Retailers incur additional costs for reading meters for which they are an MC. Origin is MC for type 4A meters where smart meters have been installed, however they have been installed without remote comms. These are known as MRAM meters. The costs of reading MRAM meters are significantly more expensive off cycle. If the prospective retailer made the decision that a MRAM read would be the most appropriate meter read option, the customer would be required to pay the MC's costs. This cost would not necessarily be transparent and would vary from MC to MC. How does a retailer know that the customer has an MRAM meter?	AEMO notes that a metering type is discoverable under the MSATS Procedures. Based on the read type code and contestable arrangements with the MCs the retailer will be aware of the potential costs that might be incurred.
14.	Origin Energy	Estimated Meter Read Fee	Energex has AER approval for an 'estimated meter read' fee. The fee is for out of cyclical meter reads. The use of estimated reads will become a common occurrence with this proposed process. If Energex has AER approval, it is likely that other MDPs will seek approval for a similar fee. Customers will wear these costs as they are a direct pass through. Has this been considered as part of the proposal? It would seem to diminish the benefits of the proposal.	<p>AEMO notes that the current Queensland DNSP pricing determination ends in June 2020. Accordingly, Energy Queensland will be able to consider pricing based on the changed procedures in formation of their application to the AER and the AER will be able to consider any proposed fees and charges accordingly. AEMO's revised timing for implementation will coincidentally coincide with the new determination.</p> <p>AEMO notes that new processes for customer switching remove a number of existing tasks, complexities and processes that DNSP MDPs are required to undertake under the current design, for example the provisioning of the actual change date via CRC 1500. The redesign eliminates some costs and complexity without</p>



No.	Consulted person	Heading	Issue	AEMO response
				<p>burdening the DNSP MDP with complex processes. The provision of previous readings and estimate readings are similar in design to the provisioning of data via a Provide Meter Data or Verify Meter Data request, that are not a chargeable service. Accordingly, AEMO does not consider that additional costs are likely to be imposed in this area, but cannot prejudge the outcome of any future AER determination on this matter.</p>
15.	Powermetric	General comments	<p>Powermetric is largely ambivalent about the scope of the rule changes. We do not consider that there are major problems with what has been proposed, while we also believe the scale of any benefits is likely to be very limited. There will however be significant costs incurred across the industry to implement these reforms, yet there has been no assessment of whether the benefits justify these costs. We consider that determining whether there is a net benefit should be a necessary part of any reform to the energy market.</p> <p>Powermetric, like many other metering businesses, is already heavily engaged in preparing for other major reforms such as Five Minute Settlement. Changes like this one divert resources and time away from more pressing issues, for no clear benefit. We also consider that the proposed timeframe for implementation – by the end of the first quarter of 2020, after a final report released in February – is far too short given the range of other activities in the market that require IT changes.</p> <p>For these reasons we do not consider that these procedure changes are needed at this stage. We consider that AEMO should first test whether there would be a clear net benefit to consumer that outweighs the costs before proceeding to implementation. Further, any implementation timeframes should recognise the substantial other work ongoing in the industry and provide a meaningful period within which to complete the necessary IT work.</p>	<p>AEMO refers to the response in Table 13 item 5 as to the issues raised concerning costs and benefits, as well the response in Table 13 item 6 in regard to timelines.</p>



No.	Consulted person	Heading	Issue	AEMO response
16.	Public Interest Advocacy Centre	General comments	<p>PIAC broadly supports AEMO's proposed procedure changes and considers they will contribute to better consumer outcomes by reducing switching times for customers wishing to change electricity retailers.</p> <p>We welcome reporting requirements to reflect compliance with the new switching process and the AEMC's intent to monitor the outcomes of the framework.</p> <p>We highlight that the increased use of bill estimates likely under the new procedures may result in customers being overcharged more often and, with retrospective switches, losing retailers needing to reimburse prepayments.</p> <p>In light of this and given the potentially large customer benefits from quicker switching times, PIAC supports the proposed provisions for overcharging and undercharging and retrospective switching, but stresses the AER and AEMO should monitor undercharging and overcharging, the accuracy of estimated reads, and how losing retailers are handling switching customers' existing bill debt and prepayments. Retailers should be required to report to the AER the numbers of under and overestimates, whether true-ups are being delivered and whether they are within the required timeframe.</p> <p>We note that some organisations have suggested allowing switches to take place during the cooling-off period, with the ability to transfer back to the losing retailer within that period. While this proposal warrants further consideration, we highlight that if the number of reverse switches is material it may result in an administrative burden for retailers which could be passed onto consumers.</p>	AEMO notes the respondent's broad support for the proposal, as well as the other issues raised.
17.	Red Energy / Lumo Energy	General comments	<p>AEMO and the Australian Energy Market Commission (AEMC) were requested by the COAG Energy Council to recommend a rule change and corresponding Procedural changes in order to effect a faster switching time frame for consumers. Red and Lumo strongly support consumers being able to access products that suit their needs expeditiously.</p> <p>Noting the above, we are concerned that the appropriate governance arrangements have not been established in order to justify implementing this change, nor would result in the delivery of net benefits to consumers. Specifically, the rule changes that AEMO have requested do not set the framework that requires changes of this magnitude required to the procedures and systems. Red and Lumo urge AEMO to undertake a full, industry-wide cost benefit analysis to understand which solutions deliver the most benefit and the least cost.</p> <p>Benefits of faster switching</p>	The NER requires AEMO to develop and publish procedures which govern the transfer of financial responsibility for energy flows at a connection point, under clause 7.16.2 (the MSATS Procedures). The CATS Procedure deals with the transfer of customers between retailers. As a result, the changes to the design of the customer transfer process from



No.	Consulted person	Heading	Issue	AEMO response
			Red and Lumo strongly support retail competition, and customers being able to access their chosen retailer's product promptly. Red and Lumo are not an incumbent retailer and have won all of our customers in the competitive market. We continue to support the goal to improve customer switching times, increase competition and believe that some aspects of the proposed changes will be successful in meeting this goal. Through the introduction of a two business day transfer time, this will allow these customers to access more competitive pricing, better customer service or a value-added product offering sooner.	a technical and operational perspective are within AEMO's remit to amend, in accordance with the NER consultation requirements. The proposed changes will enable customers to access a new retail offer, product or service within two business days regardless of location or metering type, thereby enhancing competition in the retail market. AEMO's statutory functions under the National Electricity Law ("NEL") include to facilitate retail customer transfer, metering and retail competition. AEMO refers to the response in Table 13 item 5 as to the issues raised concerning costs and benefits, as well the response in Table 13 item 6 in regard to timelines.
18.	Tango Energy		Not at this time.	AEMO notes respondent's comment.
19.	TasNetworks	Implementation without Schema Changes.	TasNetworks considers it would be possible to implement the vast majority of the new functionality proposed in the new Customer Switching rules without making changes to the B2M Schema. For example: The CR 1010 could be redesigned to handle any retrospective 15 day window transfers. The CR 1026 could be redesigned to handle the functionality proposed for the CR 1060. The CR 1028 (or 1022,1027,1028) could be redesigned to handle the functionality proposed for the CR 1061.	AEMO notes the majority of changes are configuration, however, some changes do require a schema change.



No.	Consulted person	Heading	Issue	AEMO response
			Functionality within MSATS to extract the Last Read Date and Quality from the reading files submitted by the MDP could replace the requirement for the new CR 5072. Noted that this would only work for Tier 2 NMLs until 5MS was implemented. Or if this is not an option, the retailers could retrieve the last read date from the customer (via their last bill) in situations when a CR 1040 is not applicable.	