

# CUSTOMER SWITCHING IN THE NEM

## FIRST STAGE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Evoenergy

***Submission Date:*** 20 November 2019

<https://www.aemo.com.au/Stakeholder-Consultation/Consultations/NEM-Customer-Switching?Convenor=AEMO%20NEM>

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## 1. Context

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

## 2. Questions raised in the NEM Customer Switching Issues Paper

Question No.	Question	Participant Comments
1	Does the proposed change, to limit 1000 series CRs to a change of FRMP only, unreasonably restrict a retailer or other party from performing an action as required by the NER? Are there any additional considerations that AEMO has not presented?	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.
2	Are the issues raised by AEMO regarding restrictions being placed on an MCs ability to object to an appointment reasonable?	No comment
3	Does the removal of the notification of a pending customer switch unreasonably restrict retailers from being able to comply with the NER or NERR?	No, this will simplify the transfer process.
4	Are there any alternative design options that AEMO should consider facilitating prevention of a customer switch by a retailer based on a certified debt, which are consistent with the ACCC REPI recommendations for the removal of the notification of a pending customer switch and do not unreasonably delay customer switches in Victoria?	No comment

Question No.	Question	Participant Comments
5	Does the one business day timeframe proposed to enable the raising of the new Victorian certified debt objection CRC reasonably enable retailers to exercise the ability to prevent the customer switch?	Yes, this will still enable retailers to exercise their rights to prevent a transfer.
6	Should AEMO seek to replace rather than redesign the current CRC with two new prospective CRs? If so, how might transactions 'in-flight' be treated upon implementation of the procedure changes and associated system changes?	Option 1 would require less testing time to implement over Option 2.  Option 2 does require material changes to participant systems as the scope of a CR1000 changes.
7	Is there a compelling reason to retain the use of the NSRD in the customer switching process? If so, what are these reasons; and what controls might reasonably be introduced such that its use no longer becomes commonplace and that customers benefit from the ability to access next-day switching?	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.
8	Is there value in retaining an ability for a prospective change of FRMP role to occur based on a special reading?	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.
9	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?	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

Question No.	Question	Participant Comments
		have the NSRD or Last Read Date & Quality (LRDQ). There can be only One.
10	How critical is the Read Quality information to the potential use of the Last Read Date for retrospective customer switching?	No comment
11	Are there other matters that AEMO should consider regarding the three options presented, or any alternative options that AEMO might consider?	<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>
12	Has AEMO reasonably presented the relevant considerations in relation to using recent readings to support customer switching? Are there any additional considerations that AEMO has not presented?	Agree with presented information.
13	Is the proposed 15 business day 'window' in which a recently-obtained metering reading could be used to support a retrospective in-situ customer switch reasonable? Are there additional matters that AEMO might consider in support of a lengthening or shortening of this 'window'?	Agree with the 15 business days.

Question No.	Question	Participant Comments
14	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)?	As mentioned above, this will require extensive industry testing due to the modifications to validations and use of this Change Request.
15	Is the proposed extension of five business days (from 10 to 15 business days) to the retrospective period within which a CR 1040 may be raised reasonable? Are there additional matters that AEMO might consider in support of maintaining the current 'window', or the lengthening or shortening of this 'window'?	Agree with the 15 business days.
16	Should the use of a recent reading be limited to customers who have manually read metering installations? Smart metering systems should be able to provide readings for a specified date within the last 15 business days (e.g. if a customer with a smart meter can confirm the date of their recent bill is within the last 15 business days, why should the prospective retailer be restricted from retrospectively switching the customer on that date, so that the customer and participants can access the benefits of a retrospective customer switch as described in this section?	There should be no restrictions based on meter type, thus simplifying the transfer process.
17	Has AEMO overlooked any requirement or reasonable justification for the retention of the five embedded network-specific CRs?	No comment
18	Do the changes adequately provide for retailers to comply with the cooling-off provisions and customers' exercising their right to cool-off?	Only concern here is expected volumes and what does the retailer do if there was a life support customer also?

Question No.	Question	Participant Comments
19	Is the redesign of an existing cooled-off error correction CR preferable to the creation of a new error correction CR for the purpose stated above?	No comment
20	What problems, if any, might be caused by the removal of the error correction CRCs 1022, 1027 and 1028?	No problems identified at present.
21	Should changes be considered to error correction CRCs 1020, 1021, 1023 and 1029 to better facilitate resolution of issues and errors for customer switching?	No comment
22	Are the changes proposed to the objection codes available to MCs regarding MC role appointment reasonable?	No comment
23	Are there other unreasonable restrictions placed on appointing parties by the MSATS procedures that limit or prevent MSATS role appointment to align with the NER requirements at a connection point that AEMO might consider?	No unreasonable restrictions.
24	Are there issues affecting the installation of metering that could reasonably be resolved by reducing the nominated MC's objection timeframe to zero days in MSATS?	No issues come to note.
25	Would MCs reasonably be capable of determining whether to object to transfers if the objection period for MC nomination was reduced to zero days?	No, keep objections to the same timeframe.
26	Are there further suggestions on changes to structure to improve the clarity and accessibility of sections 1 to 6 of the MSATS CATS procedures?	See notes below under Part 3. Other Issues.

Question No.	Question	Participant Comments
27	Do MSATS Participants believe that the proposed changes materially alter the obligations placed on them within the MSATS procedures?	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.
28	Is the change to the reason code in the MDFF necessary?	Yes as it is clear what the last substituted read was for.
29	Should other changes be considered to the MDFF to accommodate the changes proposed in this Issues Paper?	No other changes required.
30	Is the rationale described in this Issues Paper regarding the proposed timing for implementation reasonable?	No! with concerns around industry testing, but accepted.
31	Are there other considerations or proposals that AEMO might consider regarding the timing for implementation of the proposed changes?	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.

### 3. Other Issues Related to Consultation Subject Matter



Heading	Participant Comments
MSATS Procedures CATS v4.9	Consultation Response

Participant Name	Old Clause No	New Clause No	Comments
Evoenergy	2.4.(k)	2.4.(h)	Move 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.
Evoenergy	2.4.(m)	2.4.(m)	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.
Evoenergy	2.4.(r)	Deleted	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.
Evoenergy	4.2. Table 4-A	4.2. Table 4-A	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.

Participant Name	Old Clause No	New Clause No	Comments
Evoenergy	4.13.(b)	4.13.(b)	<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>
Evoenergy	4.13. Table 4-M Code RR	4.13. Table 4-M Code RR	<p>The new wording for point 1 is difficult to read.</p> <p>Suggest rewording to below:</p> <p>Advice from New FRMP to Current MDP either that:</p> <p>(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.</p>
Evoenergy	4.13. Table 4-M Code SP	4.13. Table 4-M Code SP	<p>The new wording for point 1 is difficult to read, and was duplicated in (b) above.</p> <p>Suggest rewording to below:</p> <p>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.</p>
Evoenergy	4.13. Table 4-N	4.13. Table 4-N	<p>Where does the new CR codes 1060 &amp; 1061 fit into this table?</p>
Evoenergy	4.14	Deleted	<p>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.</p>

Participant Name	Old Clause No	New Clause No	Comments
Evoenergy	6.1. 1000 – Change Retailer	6.1. 1000 – Change Retailer	Wording for these need a change to read better. Change to: Propective Day – a date as nominated... Retrospective Day – the date of the...
Evoenergy	6.4.(b)(i)	6.4.(b)(i)	This dot point should say “...two business days...” to align to actual practice of validating and distributing the reads.
Evoenergy	7.3.(a)	7.3.(a)	Appears to be missing a space after CR1060. Please check.
Evoenergy	7.4.(b) 8.2.(d) 8.4.(e)	7.4.(b) 8.2.(d) 8.4.(e)	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.
Evoenergy	7.5 Table 7-A	7.5 Table 7-A	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?
Evoenergy	24.	Deleted	Need to reconsider as this will add large volumes of transactions. MSATS should derive these values to minimise this volume.

Heading	Participant Comments
MDFP Specification NEM12 NEM13 v1.07	Consultation Response

Participant Name	Old Clause No	New Clause No	Comments
Evoenergy	Appendix E	Appendix E	Agree to add new Reason Code 67 to clarify why the substituted reading was auto-generated.