

# CUSTOMER SWITCHING IN THE NEM

## FIRST STAGE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

***Participant:*** SA Power Networks

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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?	
2	Are the issues raised by AEMO regarding restrictions being placed on an MCs ability to object to an appointment reasonable?	
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?	
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?	

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?	
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?	<p>Both options present a significant cost and challenge to deliver the necessary system changes required.</p> <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>
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?	
8	Is there value in retaining an ability for a prospective change of FRMP role to occur based on a special reading?	Yes, we would be supportive of this option.
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?	

Question No.	Question	Participant Comments
10	How critical is the Read Quality information to the potential use of the Last Read Date for retrospective customer switching?	
11	Are there other matters that AEMO should consider regarding the three options presented, or any alternative options that AEMO might consider?	<p>Option 2 is our preference it appears to be the lowest cost option to implement.</p> <p>Option 1 &amp; 3 will require significant system build, involvement of external vendors and would make a May 2020 delivery impossible.</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?	
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'?	
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 (linked to questions in section 3.1.2)?	
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	

Question No.	Question	Participant Comments
	'window', or the lengthening or shortening of this 'window'?	
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?	
17	Has AEMO overlooked any requirement or reasonable justification for the retention of the five embedded network-specific CRs?	
18	Do the changes adequately provide for retailers to comply with the cooling-off provisions and customers' exercising their right to cool-off?	
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?	
20	What problems, if any, might be caused by the removal of the error correction CRCs 1022, 1027 and 1028?	
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?	

Question No.	Question	Participant Comments
22	Are the changes proposed to the objection codes available to MCs regarding MC role appointment reasonable?	
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?	
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?	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.
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?	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.
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?	
27	Do MSATS Participants believe that the proposed changes materially alter the obligations placed on them within the MSATS procedures?	
28	Is the change to the reason code in the MDFF necessary?	
29	Should other changes be considered to the MDFF to accommodate the changes proposed in this Issues Paper?	

Question No.	Question	Participant Comments
30	Is the rationale described in this Issues Paper regarding the proposed timing for implementation reasonable?	<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> <p>We would be pleased to discuss the significant impacts that any earlier effective date timeframes would create with AEMO.</p>
31	Are there other considerations or proposals that AEMO might consider regarding the timing for implementation of the proposed changes?	See response to question 30.

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

Heading	Participant Comments