

# CUSTOMER SWITCHING IN THE NEM

## FIRST STAGE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

***Participant:*** CitiPower Powercor

***Submission Date:*** 22/11/2019

# Table of Contents

- 1. Context ..... 3
- 2. Questions raised in the NEM Customer Switching Issues Paper..... 3
- 3. Other Issues Related to Consultation Subject Matter..... 9

## 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>For CitiPower Powercor 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>
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.
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?	
10	How critical is the Read Quality information to the potential use of the Last Read Date for retrospective customer switching?	

Question No.	Question	Participant Comments
11	Are there other matters that AEMO should consider regarding the three options presented, or any alternative options that AEMO might consider?	<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 &amp; 3 will require significant system build, involvement of external vendors and considering we will be in the midst of the 5MS &amp; 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>
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	

Question No.	Question	Participant Comments
	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 (liked 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 '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?	

Question No.	Question	Participant Comments
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?	
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?	CitiPower Powercor support the 1 day period being retained. It gives enough time to deal with any issues.
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?	CitiPower Powercor support the 1 day period being retained. Reducing to zero days effectively means you don't have any opportunity to object.

Question No.	Question	Participant Comments
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 feedback in Section 3.
27	Do MSATS Participants believe that the proposed changes materially alter the obligations placed on them within the MSATS procedures?	See feedback in Section 3.
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?	
30	Is the rationale described in this Issues Paper regarding the proposed timing for implementation reasonable?	<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 &amp; 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>
31	Are there other considerations or proposals that AEMO might consider regarding the timing for implementation of the proposed changes?	See 30.

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

Heading	Participant Comments
CATS procedure, clause 2.4 Metering Data Provider, sub-clause (r)	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.
CATS procedure, clause 4.13 Table 4-M – Read Type Codes	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> ’.
CATS procedure, clause 3.5 (a) (v)	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."
CATS procedure, clause 4.12 (b)	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.
CATS procedure, clause 4.13 (b)	CitiPower Powercor believes this clause is not stated correctly as the service order is sent by the FRMP to the LNSP.

Heading	Participant Comments
	<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>
<p>CATS procedure, clause 4.14 (b)</p>	<p>The table reference in this clause is incorrect, it should reference 4-O.</p>
<p>CATS procedure, clause 6.6 Table 6-B Objection Rules</p>	<p>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?</p>
<p>CATS procedure, clause 24.1 Application [5072]</p>	<p>CitiPower Powercor recommends that the explanation be expanded to explicitly state that this obligation doesn’t extend to VIC AMI.</p>
<p>CATS procedure, clause 24.2 (c)</p>	<p>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.</p>
<p>CATS procedure, clause 24.7</p>	<p>‘The Change Request Status Notification Rules for the Change Reason Codes identified in section 9.1 are specified in Table 24-B’.</p> <p>Section 9.1 links back to CR1500. CitiPower Powercor recommends this be updated to reference 24.1.</p>
<p>CATS procedure, clause 24.7 Table 24-B – Change Request Status Notification Rules</p>	<p>CitiPower Powercor believes that not all the notifications are required by the MDP. Our preference would be to just receive the Completed change request.</p>

