

CUSTOMER SWITCHING IN THE NEM

FIRST STAGE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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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..... 14

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?	<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. <p>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.)</p> <ul style="list-style-type: none"> • 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>

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		<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>
2	<p>Are the issues raised by AEMO regarding restrictions being placed on an MCs ability to object to an appointment reasonable?</p>	<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>
3	<p>Does the removal of the notification of a pending customer switch unreasonably restrict retailers from being able to comply with the NER or NERR?</p>	<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>

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		<p>These notifications operationally support the MC/MPB/MDP participants to:</p> <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.
4	<p>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?</p>	
5	<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?</p>	
6	<p>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>	<p>PLUS ES strongly:</p> <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

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		<ul style="list-style-type: none"> Opposes the proposed change to remove the CR1010 – retrospective CR and dual purpose the CR1000 as a prospective and retrospective CR. <p>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.</p>
7	<p>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?</p>	<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>
8	<p>Is there value in retaining an ability for a prospective change of FRMP role to occur based on a special reading?</p>	<p>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 would mitigate any possible disputes</p>

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		with the final billing, which would ultimately impact the MDP with validating the meter data provided.
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?	<p>PLUS ES recommends maintaining the NSRD (see response to Qn 7).</p> <p>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.</p>
10	How critical is the Read Quality information to the potential use of the Last Read Date for retrospective customer switching?	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.
11	Are there other matters that AEMO should consider regarding the three options presented, or any alternative options that AEMO might consider?	<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>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</p>

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		not deliver the benefits to justify the costs associated with the proposed changes.
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?	<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>
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'?	<p>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.</p> <p>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.</p>
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)?	<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</p>

Question No.	Question	Participant Comments
		<p>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
15	<p>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'?</p>	
16	<p>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?</p>	<p>PLUS ES has no issue with retailers and customers using the benefit of Smart Metering.</p>

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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?	PLUS ES supports the utilisation of the existing CR1026 for cooled-off error corrections.
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?	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.
22	Are the changes proposed to the objection codes available to MCs regarding MC role appointment reasonable?	PLUS ES supports the proposed objection code changes available to an MC. PLUS ES also reiterates that MCs should have the ability to object to a prospective/retrospective appointment. In most scenarios, the MC objection would be due to a valid commercial/contractual agreement. i.e. a Direct Metering

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		<p>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>
23	<p>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?</p>	
24	<p>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?</p>	<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>

Question No.	Question	Participant Comments
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?	PLUS ES systems support the MC's ability to determine whether to object to transfers on the day the CR was requested.
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?	<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>
28	Is the change to the reason code in the MDFF necessary?	Yes, the reason code is required, to identify the reason why a substituted value was provided at that point in time.
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?	PLUS ES supports the implementation of the changes to align with the May 2020 MSATS release, no earlier.
31	Are there other considerations or proposals that AEMO might consider regarding the timing for implementation of the proposed changes?	PLUS ES notes that changes will also impact MC/MPB systems not only limited to the MDP participant.

3. Other Issues Related to Consultation Subject Matter

MSATS CATS	
Heading	Participant Comments
2.1. General Obligations (e) (ii)	<p>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:</p> <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.
Table 4-A – Assignment of Change Reason Codes to Events	PLUS ES recommends that CR1010 - Change Retailer is maintained as a retrospective CR and CR1000 remains a prospective CR for Change Retailer.
4.7. Objection Codes (a)	PLUS ES recommends that the latter half of the clause is omitted as it is a duplication/reiteration of Clause 2.1(e) (ii)
4.13. Read Type Code (c)	Recommend:

MSATS CATS	
Heading	Participant Comments
	<ul style="list-style-type: none"> • a ':' or ',' after the word 'example' and • Lowercase 'a' for A special Read Date (SP)
<p>4.13 Read Type Code Table 4 – M</p> <p>EI – Existing Remotely Read Interval Meter</p>	<p>PLUS ES recommends that the 'EI' read type code is maintained:</p> <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. <p>Furthermore, PLUS ES (MDP) is supported by multiple systems and the 'EI' Read Type Code allows us to differentiate contestable metering.</p>
<p>4.13 Read Type Code Table 4 – M</p> <p>RR – Read Required</p>	<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
<p>4.13 Read Type Code Table 4 – M</p> <p>SP– Special Read</p>	<p>PLUS ES recommends the removal of the wording 'will be' so that the sentence reads:</p> <p><i>Advice from New FRMP to MDP that a B2B Service Order has been provided...</i></p>

MSATS CATS	
Heading	Participant Comments
	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.
4.14. Last Read Quality Flag (b)	Typo: Table 4-M should read Table 4-O
4.17. Maintenance of Codes and Rules (a)	<i>From time to time....</i> 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>
Section 6.1	PLUS ES strongly recommends that: <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>
Section 6.3 (b) – MC (RP) role	<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.

MSATS CATS	
Heading	Participant Comments
Section 6.3 (b) – Read Type code	<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
Section 6.4 (b) (i)	<p>PLUS ES proposes rewording to: ‘...within two business days...’. The word ‘business’ is currently missing.</p>
Section 6.5 – Table 6-A Timeframe Rules	<p>As per PLUS ES’ earlier proposal:</p> <ul style="list-style-type: none"> • If CR1000 remains prospective – remove the 15 bus days from the Retrospective Period
Section 6.6 Objection Rules	<p>As per PLUS ES earlier proposal, if accepted, retain CR1010 table</p>
Section 6.7 Change Request Status Notifications Rules	<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

MSATS CATS	
Heading	Participant Comments
	<ul style="list-style-type: none"> • 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
Section 6.7 Change Request Status Notifications Rules	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.
Section 7 Reverse Change Request	PLUS ES recommends retaining CR1026, with redesign aspects, as required, in favour of creating new CRs.
Section 7 Reverse Change Request	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.
Section 7 Reverse Change Request	Recommend that the title of this section identifies that it is only for Small. i.e. Reverse Change Request – Small
Section 7.4 – FRMP requirements	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.
Section 7.7 Change Request Status Notifications Rules	PLUS ES strongly supports that the notifications to the current MPB and the MC should remain. Maintaining the notifications will:

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	<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
Section 7.7 Change Request Status Notifications Rules	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.
Section 8 Change Retailer – Error Corrections – Small NMIs	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.
Section 8.4 – FRMP requirements	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.
Section 8.8 – Objection Rules	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?
Section 8.9 Change Request Status Notifications Rules	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

MSATS CATS	
Heading	Participant Comments
	Please see prior note for section 8.8 Objection Rules.
Section 8.9 Change Request Status Notifications Rules	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.
Section 24 Maintain NMI – Update Last Read Date (General comment)	<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> <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
Section 24.4 MDP Requirements (d)	Clarification sought: When the MDP populates 'Its Participant ID' and the 'MDP', isn't this requesting the same information twice?