DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

***Participant**: United Energy*

***Completion Date**: 8 December 2014*

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1. Proposed Changes

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- SLP Metering Provider Services Category B for Metering Installation Types 1, 2, 3, 4, 5 and 6

NOTE: No proposed changes have been populated please refer to mapping documents and change marked procedures. Please complete where necessary

Please include your comments in the 'Participant Comment' column below.

A. General Comments

Item	Description	Category	Participant Comments
1	**PROPOSED/ REQUESTED CHANGES**		
1.1	UE support the change of the effective date from 31 Dec 2014 to late in 2015. UE prefer to align the changes in this meter churn pack and the consequential MDFF changes with the Nov MSATS release. UE considers that given the MDFF changes have not commenced consultation that this may allow more time to plan any IT changes required.		
1.2	UE note the number of comments suggesting that the proposed changes to the various procedures are not in consumers interests and will create a barrier to efficient meter churn. There has been no consideration that if the retailer is not the FRMP, then the new retailer is impacting the old retailer and the old customer which some may consider is also not appropriate or in that customers interests. Where the customer remains insitu they may feel more comfortable and accept that their current/old retail contract is impacted. Retailers and a number of other submissions (brokers and competitive metering providers) note that the gap period is complex, creates confusion for customers, impacts customers benefits, requires additional contract		

Item	Description	Category	Participant Comments
	negotiation to gain the data and services during this gap period etc. Essentially the gap period can occur before or after the transfer date, the gap period is still there. The gap period is complex for all parties and there are a significant number of hidden costs. It is important that AEMO ensure that the role obligations and processes are clear and that for greater levels of churn there is an ability to increase the levels of automation. The paperwork returning from the field etc at higher volumes of field work is not going to lead to good outcomes across the market. The gap period will not be removed but efforts need to be made to reduce the gap period and the impacts on the old/current customer/retailer/network relationships. There would be benefit in the AEMC metering rule changes making the policy positions in respect of the interruption/continuity of old customer contracts as there may need to be some consideration in the NER and/or NERR. Ideally any rule changes made to this effect should not be overly prescriptive but seek to preserve the rights of parties and enable the procedures to detail efficient mechanism and processes to reduce the gap period to a manageable and robust level. In addition UE is interested to ensure that existing contracts with customers are able to be preserved across these changes, at no point do the meter churn procedures consider the impact on network tariff and network data and the continuity of these arrangements. As noted by Energy 4 Business, LNSPs are not interested in uncertainty of network charging for this period due to the uncertainty that this creates as this just leads to increased billing issues and disputes and ultimately cost to customers.		
1.3	AEMO considers that the requirements of the NER with respect to meter churn do not preclude a third party from obtaining customers data from the existing provider. UE query where in the NER it suggests that the existing service providers (MP/MDP) need to provide this data to third parties. The recent AEMC rule change on customer access to information decided		

Item	Description	Category	Participant Comments
	against third parties accessing this data from MP/MDP roles as these roles cannot readily verify the customer.		
1.4	E4B note that they will be forced to negotiate with a range of MPs to access data during the gap period which will lead to increased costs. Network services will similarly for LNSPs need to be renegotiated with the new service providers and which is likely to lead to increased costs. A proper functioning competitive market will sort these issues out on the retail side.		

B. Proposed Changes to the Meter Churn Package

Item	Description	Category	Participant Comments
1	**PROPOSED/ REQUESTED CHANGES**		
1.1	UE support comments made by AGL and SP that the meter churn process should be transparent and not left open to differing interpretation by parties. The role obligations should also be clear and the method of interaction. Where diagrams are useful for industry to ensure a common agreed processes they should be part of the procedure. BDPIP process flow diagrams are not part of the regulatory framework and would result in a change of scope late in this consultation process.		

C. Proposed Changes to the SLP - MP

Item	Description	Category	Participant Comments
1	**PROPOSED/ REQUESTED CHANGES**		
1.1	In 4.11.3 there is no mention of where the LNSP may need to advise their requirements of the metering installation. The LNSP should have the		

Item	Description	Category	Participant Comments
	opportunity to continue their network or customer arrangements at that site eg timeswitch for off peak load, 15 min or 5 min data, smart meter settings etc. LNSP requirements need to be considered in the NER, MSATS or SLP framework. The current MSATS notifications to the LNSP of change of RP will need to be reviewed to ensure the long term interests of customers are maintained.		
1.2	4.11.The current paperwork and email trail meter exchange process will need to be reviewed for mass market. These will not be sustainable at any volume.		
1.3	4.12.1 task 5. It would be useful to be clear on what information is available from where and to clearly specify the role obligations. MSATS should be the first and most efficient place to extract information, followed by current MP and lastly the LNSP. UE support the comments made by AusNet Services in the last round of consultation.		
1.4	Fig 1 - AEMO advise in their response that the methods of notification between each of the roles on tasks 3 and 5 in Fig 1 are clarified in 4.11. It would be useful if the methods of notification to each of the roles in these tasks were clarified eg phone or MSATS notifications.		

D. Proposed Changes to the SLP - MDP

Item	Description	Category	Participant Comments
1	**PROPOSED/ REQUESTED CHANGES**		
1.1	8.1.6 UE agrees that the old MDP should release part day data in a timely manner to the new MDP. UE query the practicality of this if there is any reliance on the following activities being completed within 2 business days of the exchange in the field - a meter return to store, registration in store and		

Item	Description	Category	Participant Comments
	reading/downloading the data, uploading and processing into IT systems and forwarding to the new MDP. Meters may be returned to store but this is unlikely to occur on the day of or the day following the meter churn. This places a heavy reliance on the MDP undertaking a last interrogation just before the old meter is removed.		