DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

***Participant**:* EnergyAustralia

***Completion Date**:* 24 Oct 2014

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A. PROPOSED CHANGES TO THE METER CHURN PACKAGE 3

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. Proposed Changes to the Meter Churn Package

Item	Description	Category	Participant Comments
1	**PROPOSED/ REQUESTED CHANGES**		
1.1	**Effective date of 31st Dec 2014**	**Procedure ~~only~~ and system change**	EnergyAustralia opposes the effective date of 31st December 2014. This is a significant change to C&I customers, processes and systems at the busiest time of the year for this customer segment. EnergyAustralia also notes this has an impact to customer expectations and brokers therefore time is needed to ensure the customer is educated and not being disadvantaged by this change. Whilst EnergyAustralia understands the following has been undertaken between AEMO and the AER: *In March 2014, AEMO sought comfort from the AER that it would not pursue enforcement action against these registered participants until it had an opportunity to revise the Meter Churn Procedures. AEMO suggested to the AER that its revision process would be completed by December 2014.*[1] Whilst a document change can be undertaken at any point in time, there was no consideration or engagement with industry participants on how this would impact processes and system. Expecting industry to have systems ready by 31st of December whilst the consultation only finalises on this date is unachievable. EnergyAustralia suggest a more efficient management of this change would be to incorporate the change with the upcoming AEMC Power of Choice

[1] AER Quarterly Compliance Report: National Electricity and Gas Laws April – June 2014

Item	Description	Category	Participant Comments
			Rule change which effectively re-writes Chapter 7 of the NER. However if this can't be accommodated then at least avoiding peak market churn periods would be more appropriate to ensure a smooth transition for the consumers who will be bearing a considerable impact from this change. Whilst the Procedures are finalised on the 31st of December EnergyAustralia proposes and effective date of 30th September 2015 is more achievable as a minimum. EnergyAustralia requests AEMO provide exceptions for existing contracts. Customers have entered into these under the existing market procedures and therefore should be allowed to proceed.
1.2	Scope of Consultation change	**Procedure ~~only~~ and system change**	Whilst EnergyAustralia recognises AEMO has identified a discrepancy between the Rules and the Procedures the management of this discrepancy has been disappointing for the following reasons: • AEMO had precedent of discrepancies between Rules and Procedures previously. In that situation AEMO put forward a Rule change to reflect the market function as seen when the MDP role was included in the Rules. • AEMO appears to have given no consideration to the impact this change has to the customers impacted, with this change a customer could have to wait up to 2 months before realising the benefit of interval data and the contract benefits. • This process will add further complexity to an already confusing market for customers moving from type 6 to interval. Customers will be looking for the benefits of the new contract from day one. The realisation of these benefits won't occur until the meter is changed, which could be up to 40 business days post the transfer. This is a very long time to wait before commencing to receive these benefits and a very confusing message. • In order to ensure this market change meets the NEO EnergyAustralia has been unable to receive any information from AEMO that substantiates the necessity for this procedural change other than to align the procedure to the Rules. • EnergyAustralia is very concern this change will push consumer behaviour to a place that isn't consistent with the current Power of Choice intentions for competition in the metering.

Item	Description	Category	Participant Comments
1.3	1.2.1 ... meaning specified in section 1.4 of this procedure.	**Procedure only**	Update clause number to 1.5
1.4	Formatting / Typos etc	**Procedure only**	3.1.2 b) Meter Churn needs to be in italics 3.2.1 c) Remove ‘ after *metrology procedure:* Part A 3.2.1 c) iii italicise metering installation
1.5	3.2.1 d) iii Subject to jurisdictional regulations, the meter change date + 1 day for an interval to accumulation meter change.	**Procedure only**	~~Subject to~~ For jurisdictions~~al~~ ~~regulations~~ where reversion is permitted, the meter change date + 1 day for an interval to accumulation meter change. EnergyAustralia requests the above change to align with the wording used in the MDP SLP; this wording also provides further clarity to what regulations are being referenced.
1.6	Use of *service level procedure* in MDP SLP and MPB SLP	**Procedure only**	The MDP SLP alternates between capitalised and lowercase use of Service Level Procedure, where as the MPB uses the Rules italicised *service level procedure.* As this is a defined term in the Rules the MDP SLP needs to have all uses of *service level procedures* italicised to reflect the Rules and be consistent with MPB SLP.