



# NEM CUSTOMER SWITCHING

FINAL REPORT AND DETERMINATION

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## EXECUTIVE SUMMARY

The publication of this Final Report and Determination (Final Report) concludes the Rules consultation process conducted by AEMO on proposed amendments to the Market Settlement and Transfer Solution (MSATS) Procedures under the National Electricity Rules (NER).

On 20 December 2019, AEMO published its Draft Report for this package of amendments, called the NEM Customer Switching.

The Draft Report detailed proposed amendments to the:

- MSATS Procedures: CATS;
- MSATS Procedures: WIGS;
- Meter Data File Format Specification NEM12 & NEM13; and
- Retail Electricity Market Procedures - Glossary and Framework.

AEMO received 20 submissions (including three late submissions) from retailers, Local Network Service Providers (LNSPs), Metering Coordinators (MCs), Meter Providers (MPs), Metering Data Providers (MDPs), customer advocates and intending participants. AEMO also held seven meetings with participants outlined in the following table:

Meeting/forum	Topic	Held with	Date
Meeting	Draft Determination	AGL	11/2/2020
Meeting	Draft Determination	Endeavour Energy	23/1/2020
Meeting	Draft Determination	EnergyAustralia	23/1/2020
Meeting	Draft Determination	EnergyQueensland	23/1/2020
Meeting	Draft Determination	Evoenergy	23/1/2020
Meeting	Draft Determination	Origin Energy	29/1/2020
Meeting	Draft Determination	Simply Energy	17/1/2020

Based on feedback provided in these submissions and its own analysis, AEMO has identified four material issues. These issues are addressed in this Final Report, on the topics of:

- Notification of a pending role change;
- Retrospective customer switches for customers with manually read metering installations;
- Raising Change Requests in relation to obtaining explicit informed consent; and
- Timing and implementation.

After considering the submissions and evaluating comments against the requirements of the NER and the Amending Rules, AEMO's Final Determination amends various clauses across the retail electricity procedures to provide clarity on specific issues highlighted. Overall, there was broad support from multiple respondents for the proposed amendments from the draft stages of consultation.

Subsequent to the provision of submissions for AEMO's consideration, market participants have been working on preparedness and response to COVID-19. AEMO recognises the challenges created by COVID-19 and has taken this into consideration in addition to submissions and other feedback received from interested parties, in particular in relation to timing for implementation of the procedure changes.

AEMO has elected not to provide an effective date for these changes. AEMO will continue to monitor the effects of COVID-19 and is working with the AEMC and stakeholders to review the delivery plans for this



change and other regulatory reform. Once this work is completed, the effective date for changes to procedures for customer switching will be communicated.



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## 1. STAKEHOLDER CONSULTATION PROCESS

As required by clause 7.16.7 of the NER, AEMO consulted on proposed amendments to various retail electricity procedures to update the customer switching process design. The consultation was conducted in accordance with the Rules consultation procedures in Rule 8.9 of the NER.

The table below outlines the consultation steps AEMO has undertaken.

Deliverable	Date
Notice of first stage consultation and Issues Paper published	17 October 2019
First stage submissions closed	22 November 2019
Draft Report & Notice of second stage consultation published	20 December 2019
Submissions due on Draft Report	29 January 2020
Final Report published	11 March 2020

The publication of this Final Report marks the completion of the consultation and presents AEMO's response to the feedback received.

Note that there is a glossary of terms used in this Final Report at Appendix A.

## 2. BACKGROUND

### 2.1. NER requirements

AEMO is responsible for the establishment and maintenance of metering procedures specified in Chapter 7 of the NER except for procedures established and maintained under Rule 7.17.

The procedures authorised by AEMO under Chapter 7 of the NER must be established and amended by AEMO in accordance with the Rules consultation procedures.

### 2.2. Context for this consultation

#### 2.2.1. Regulatory context

On 3 December 2018, the Australian Energy Market Commission (AEMC) and AEMO provided joint advice to the Council of Australian Governments (COAG) Energy Council about improving the customer switching process in the National Electricity Market (NEM).<sup>1</sup> The advice considers the related recommendations 8 and 9 of the Australian Competition and Consumer Commission (ACCC) Retail Electricity Pricing Inquiry (REPI) Final Report.<sup>2</sup> These recommendations are:

- Recommendation 8: AEMO [should] amend its rules and procedures so that losing retailers are only given a loss notification on the actual date of transfer of financial responsibility for the customer to the new retailer. This will limit the opportunity of 'losing' retailers to conduct 'save' activity before a customer transfer has taken place.
- Recommendation 9: The AEMC should make changes to speed up the customer transfer process, for example by enabling customers to use self-reads of their electricity meters. This will ensure that customers move to new offers quickly and will limit the time available for 'losing' retailers to conduct 'save' activities.

<sup>1</sup> AEMO and AEMC *Joint advice: Implementation options for ACCC recommendations 8 and 9 – customer transfers*. Available at: <https://www.aemc.gov.au/market-reviews-advice/aemc-and-aemo-joint-coag-energy-council-advice-customer-transfers>.

<sup>2</sup> ACCC *Retail Electricity Pricing Inquiry—Final Report*, June 2018. Available at: <https://www.accc.gov.au/>



The AEMC and AEMO joint advice proposes that, in order to efficiently deliver the ACCC recommendation outcomes, a range of actions and changes must be made to the customer switching process to improve, streamline and provide greater transparency for customer switching within the retail energy market. There are a range of issues with the current customer switching process that may be allowing for, or contributing to, opportunities for parties to delay a customer switch and to enable the conduct of a 'save activity'. The AEMC and AEMO also note that the existing customer switching process is outdated (designed at the time that the market first moved to retail competition) and needs review to meet customer expectations and improve retail market competition.

At its December 2018 meeting, the COAG Energy Council endorsed the AEMC and AEMO joint advice and work program to address improving customer transfers.

### **2.2.2. AEMO High level Design and Rule Change**

As a specific action, the joint advice recommended that AEMO produce and submit to the AEMC a high level design (HLD) and associated rule changes to improve the customer switching process, streamline existing processes and improve retail market competition.<sup>3</sup>

In particular, the HLD and associated rule changes were to:

- Enable a process that allows a customer to transfer retailers within two days after the end of the cooling off period; and
- Have regard to the appropriate timeframes for notification and meter read options. For example, a customer self-read, last billable reads, forecast or substitute and smart meter reads.

The relevant principles were to be that:

- There is a simple, easy and timely customer switching process for consumers;
- The supporting procedures are streamlined, transparent and provide certainty for participants;
- The obligations for parties are clear, enforceable and can be reported on;
- Any changes have regard to the implementation and ongoing costs; and
- The HLD and associated rule changes were also to take into account and consider:
  - Customer protection issues, including billing and contract information; and
  - Energy billing and settlement, and enforcement arrangements including reporting of breaches by the AER.

On 24 May 2019, AEMO submitted a rule change request to the AEMC to amend the NER and the National Energy Retail Rules (NERR). A detailed HLD paper which set out AEMO's proposed changes to AEMO's MSATS Procedures was provided to the AEMC and published alongside the rule change proposal.<sup>4</sup> The Final Determination and Rule was published on 19 December 2019.

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<sup>3</sup> AEMO and AEMC *Joint advice: Implementation options for ACCC recommendations 8 and 9 – customer transfers*.

<sup>4</sup> AEMC Reducing customers' switching times (retail) RRC0031. Available at: <https://www.aemc.gov.au/rule-changes/reducing-customers-switching-times-retail>



The AEMC final determination comments that the Rule:

...will, or is likely to, contribute to the achievement of the NEO and [National Energy Retail Objective (NERO)] for the following reasons:

- by facilitating AEMO's high level design, the amendments made to the NER are likely to improve the...transfer process by removing regulatory and administrative processes that were outdated and contributing to delays and failed transfers.
- the clarifications made [in the AEMC Determination] regarding the use of estimate reads for final bills and the amendment made to the model terms and conditions for standard retail contracts will increase transparency and certainty within the transfer process.
- The clarifications [in the AEMC Determination] act as a check that the current Rules provide adequate consumer protections related to retail customer transfers and support consumer choice of retail energy market products and services.

...also meets the "consumer protection test" of the NERO...by strengthening the...protections in the model terms and conditions for standard retail contracts relating to customer transfers.<sup>5</sup>

More generally, the AEMC:

- ...reiterates its support for AEMO's procedure changes from its joint advice to COAG...in particular [supporting] the move to...remove features of the customer transfer process where the losing retailer is notified in advance of a customer changing retailer. The [AEMC] does not consider this is a feature of a well-functioning market. As a general principle, the market transfer processes should not facilitate retailers conducting save activity. This is consistent with the [AEMC's] recommendations in the 2014 Review of Electricity Customer Switching, and subsequently the ACCC's recommendations in the [Retail Electricity Pricing Inquiry (REPI) – Final Report, June 2018].

On 17 October 2019, AEMO published the Notice of First Stage Consultation and the Issues Paper for this package of amendments, called the NEM Customer Switching. The Draft Report and draft procedures were published on 20 December 2019.

### **2.2.3. Context for MSATS procedural and system changes**

MSATS procedures define the roles and obligations of participants and AEMO, facilitating and supporting an efficient process for the:

- Provision and maintenance of MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations Standing Data;
- Discovery of approved NMI Standing Data;
- Transfer of retail customers between retailers;
- Registration of metering installations; and
- Settlement and administration of NMIs.

In the context of customer switching, there are two MSATS Procedures that require amendment to accommodate the changes proposed in this Draft Determination:

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<sup>5</sup> AEMC Determination, section 2.4, page 8. The AEMC made the Determination in response to AEMO's request on 23 May 2019, to consider making a rule change under section 91 of the National Electricity Law.





- MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations - that apply to customer connections in the NEM; and
- MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMs – that apply to wholesale connections in the NEM.

Processes and systems which facilitate the customer switching experience were designed at the time that the market first moved to retail competition. These processes and systems have not significantly changed since this time. Therefore, in order to realise the outcomes of the joint advice and AEMC Rule Change process, key changes to the MSATS Procedures and associated systems are required. At a high level, these changes can be categorised into:

- Amendments supporting a change in the FRMP (refer section 4.1);
- Related MSATS procedural changes (refer to draft procedures supplied with this consultation);
- Consequential changes to the Meter Data File Format (refer to draft procedures supplied with this consultation); and
- Timing for implementation of the proposed changes to AEMO procedures and systems (refer to section 4.4).

This Final Determination makes reference to:

- NER version 124;
- MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations version 4.8;
- MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMs version 4.8;
- Meter Data File Format (MDFF) Specification NEM12 & NEM13 version 1.06; and
- Retail Electricity Market Procedures – Glossary and Framework version 2.2.

### 2.3. First stage consultation

AEMO issued a Notice of First Stage Consultation on 17 October 2019, and published an Issues Paper for the NEM Customer Switching. This information is available on [AEMO’s website](#).

The Issues Paper included details on AEMO’s stakeholder engagement in the course of developing the initial draft procedures, including various proposals that were discussed at consultative forums with industry representatives. The Issues Paper included a summary of the specific amendments proposed in the initial consultation pack. To help stakeholders and other interested parties respond to this Issues Paper, AEMO published a draft of MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations and Meter Data File Format (MDFF) Specification NEM12 & NEM13 incorporating the changes AEMO proposes for consultation on 31 October 2019.

AEMO received 26 submissions in the first stage of consultation, four of which were a late submission.

AEMO also held eight meetings/forums detailed in the following table:

Meeting/forum	Topic	Held with	Date
Meeting	Issues Paper	AGL	11/11/2019
Meeting	Issues Paper	Australian Energy Council	12/11/2019
Meeting	Issues Paper	EnergyAustralia	21/11/2019
Meeting	Issues Paper	Simply Energy	18/11/2019



Meeting/forum	Topic	Held with	Date
Participation forum	Issues Paper	Consumer Advocates	15/11/2019
Participation forum	Issues Paper	Energy Ombudsman	20/11/2019
Participation forum	Issues Paper	Emerging Retailers	20/11/2019
Participation forum	Last Read Date	Retailers	28/11/2019

Copies of all written submissions (excluding any confidential information) have been published on AEMO's website at: <https://aemo.com.au/Stakeholder-Consultation/Consultations/NEM-Customer-Switching?Convenor=AEMO%20NEM>.

## 2.4. Second stage consultation

AEMO issued a Notice of Second Stage Consultation on 20 December 2019, and published a Draft Report and draft procedures for the NEM Customer Switching. This information is available on [AEMO's website](#).

The Draft Report included details on AEMO's stakeholder engagement in the course of developing the draft procedures. The Draft Report included a summary of the specific amendments proposed in the draft consultation pack.

AEMO received 20 submissions (including three late submissions) from retailers, Local Network Service Providers (LNSPs), Metering Coordinators (MCs), Meter Providers (MPs), Metering Data Providers (MDPs), customer advocates and intending participants. AEMO also held seven meetings outlined in the following table:

Meeting/forum	Topic	Held with	Date
Meeting	Draft Determination	AGL	11/2/2020
Meeting	Draft Determination	Endeavour Energy	23/1/2020
Meeting	Draft Determination	EnergyAustralia	23/1/2020
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Meeting	Draft Determination	Evoenergy	23/1/2020
Meeting	Draft Determination	Origin Energy	29/1/2020
Meeting	Draft Determination	Simply Energy	17/1/2020

Copies of all written submissions (excluding any confidential information) have been published on AEMO's website at: <https://aemo.com.au/Stakeholder-Consultation/Consultations/NEM-Customer-Switching?Convenor=AEMO%20NEM>.

## 3. SUMMARY OF MATERIAL ISSUES

This section details the material issues AEMO identified during the review process in the second stage of submissions. It also provides AEMO's assessment of the issues and how AEMO proposes to address them.

The key material issues arising from the proposal and raised by Consulted Persons are summarised in the following table:



No.	Issue	Raised by
1.	<u>Notification of a pending role change</u>	Multiple Respondents
2.	<u>Retrospective customer switches for customers with manually read metering installations</u>	Multiple Respondents
3.	<u>Raising Change Requests in relation to obtaining explicit informed consent</u>	Multiple Respondents
4.	<u>Timing and implementation</u>	Multiple Respondents

A detailed summary of all issues raised by Consulted Persons in submissions, together with AEMO's responses, is contained in Appendix B.

## 4. DISCUSSION OF MATERIAL ISSUES

### 4.1. Notification of a pending role change

#### 4.1.1. Issue summary and submissions

Matters relating to the notification of a pending role change were discussed extensively in section 4.2.1 of the Draft Report. In summary, the changes to procedures and processes will no longer provide the losing retailer with notice that a customer is in the process of switching retailers.

AEMO noted in the Draft Report that the changes aligned with the ACCC REPI report's specific recommendations for AEMO to remove notifications of a customer switch to prevent 'save' activity from occurring.

AEMO determined that prior to Change Request (CR) completion, notifications related to 1000 series CRs should be limited to:

- The party raising the CR (e.g. the new retailer); and
- Parties which are provided with a right within the market framework to object to a role change prior to its completion.

Submissions to AEMO have restated the concerns raised and considered within the Draft Report – that risks and issues will be created regarding works or actions planned to be performed at the connection point, in particular regarding planned disconnections, when losing retailers are no longer provided with forward notice of a customer seeking to switch away from them. The example provided by the majority of parties was that a retailer might raise a disconnection service order, but if informed of a pending customer switch might choose to cancel the service order prior to disconnection. If notification of a customer switch is not provided to the current retailer until customer switch completion, the losing retailer would not be able to cancel the disconnection (or other planned works) ahead of time, and this might lead to a wrongful disconnection.

In the Draft Report, AEMO agreed that the removal of the notification of a pending customer switch will mean that the current retailer has no advanced knowledge of a customer switch. When a retailer changes at a connection point in MSATS, it occurs on the midnight boundary. As a result, the completion notification is provided to the losing retailer and other affected participants at the very start of the day that the customer moves to the new retailer (in the case of a retrospective switch, the notice is provided on the midnight boundary of the change request completion, confirming the retrospective date of the switch). Any work planned and performed on behalf of the losing retailer prior to that point would have been performed under their authority. If the losing retailer has arranged for work to be undertaken following receipt of a notification of a completed customer switch, if there are not processes in place then industry needs to develop them to prevent that work from proceeding.



In the Draft Report AEMO concluded that:

- There are mechanisms that can be employed by retailers and their service providers to minimise risk of confusion to customers, or of any service works being undertaken inappropriately, without the need for a notification of a pending customer switch;
- The removal of the notification will prevent 'save' activity and be beneficial to retail competition and customers, consistent with the ACCC REPI recommendations; and
- Notification of a pending customer switch would be removed to the various parties, including the losing retailer (other than specific error correction CRs which require mutual agreement between more than one retailer), as had originally been proposed.

In submissions to the Draft Report, AGL commented that with the removal of the pending notification retailers' available checks and controls are not sufficient to ensure an optimal customer experience, particularly in the context of wrongful disconnections. Red/Lumo proposed that a notification of a pending switch should be provided to the losing retailer to allow more time to cancel pending work; this view was supported by Momentum Energy. Some retailers, including Energy Australia, suggested that 'win back' activity should be banned to prevent save activity, rather than removing the pending loss notification.

Powershop agreed with AEMO's view that retailers would have processes in place to prevent work from proceeding on receipt of a completion notification, but noted that there will be fringe cases where work may not be able to be stopped for reasons such as technicians not being able to be contacted whilst in transit. Powershop suggested that this matter should be monitored by AEMO and stakeholders and acted upon with a technical solution if there is a need to do so.

Consumer protections regarding the switching process were also commented on by a number of retailers.

#### 4.1.2. AEMO's assessment

The party most negatively affected by a wrongful disconnection is the customer who is disconnected. The NERR and Essential Services Commission (ESC) Codes and Operating Procedures consider this risk and place requirements on retailers, in order to prevent wrongful disconnections from occurring. Retailers do not perform the task of disconnection themselves, rather the task is either undertaken by the DNSP, or where remote disconnection is enabled, by the MC appointed by the retailer<sup>6</sup>.

Disconnection service orders are typically raised using the B2B mechanism, and in line with the B2B Procedures. There are restrictions on when a disconnection can be undertaken, as defined in the NERR and ESC Codes. These restrictions are not presented in full in this paper, but include limiting periods of disconnection to the hours of 8.00am to either 2.00pm (in VIC) or 3.00pm (outside of VIC), Monday to Thursday (where those days are business days and are not before a public holiday). For simplicity, a period within which a disconnection can physically occur will be referred to as the 'disconnection window'.

Completion notifications of a customer switch will be sent to all relevant parties soon after the midnight boundary, including notifications to the losing retailer, new retailer, Metering Coordinator (MC) and DNSP. A retailer who receives a notification of a completed switch, confirming that they are no longer the retailer at a connection point, has at least a period of several hours to cancel a pending disconnection prior to the next 'disconnection window' commencing.

AEMO considers that there are numerous options which retailers could explore and seek to implement to prevent a wrongful disconnection in a scenario where the customer switches to another retailer. These options might include, but would not be limited to one or a combination of the following:

1. The losing retailer raising an order via the B2B system, or contacting the party actioning the service via another method, to cancel the pending service order;

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<sup>6</sup> AEMO understands that at the time of writing, remote disconnections are limited to Victoria.



2. The losing retailer establishing arrangements in order that the MC cancel pending work where the requestor is no longer authorised to have that work undertaken (e.g. upon the MC receiving a notification of a customer switch, confirming that the requesting retailer is no longer an authorised party at the connection point);
3. The retailer requesting, or otherwise agreeing with the party undertaking the disconnection work that it will not commence before an agreed time in the day, say 10.00am, in order that the retailer or provider can be afforded additional time to confirm that the authority to disconnect remains valid; or
4. The party actioning the service request performs a confirmation check to confirm that a disconnection request is still valid on the day that the order is to be actioned.

The processes as proposed by AEMO enable customer switches to occur retrospectively, on the day the customer is liaising with the retailer or their agent, or an agreed date in the future. As a result, the concept of a 'pending notification' being issued sometime prior to a 'completion notification' is no longer relevant for many switches. For example, if a customer switch is raised on date 'X', to be made effective on that same date, there is no separation in the delivery time for notifications – the new retailer will receive both the pending and completion notification on the midnight boundary between date 'X' and date 'X+1'. Accordingly, the receipt, or lack thereof, of a pending notification is moot as in itself it would not necessarily provide any forward notice of a customer switch, even if one were deemed necessary.

#### **4.1.3. AEMO's conclusion**

AEMO remains of the view expressed in the Draft Report, that there are mechanisms that can be employed by retailers and their service providers to minimise risk of confusion to customers, or of any service works being undertaken inappropriately following implementation of the changes to the customer switching process.

The greater flexibility being provided by the changes considered in this consultation regarding how retailers can switch customers and the speed by which customer switches can take place might require retailers to consider how they ensure that service work, including disconnections, is only carried out when they have the appropriate authority (i.e. they are the retailer on the day that their requested disconnection is to be performed).

The interest in the matter presented in submissions and meetings with AEMO, demonstrates that retailers are aware of the importance of ensuring that customers are not wrongfully disconnected, and their obligations in this regard. AEMO considers that retailers are appropriately engaged and incentivised to establish processes that ensure customers are not wrongfully disconnected. This might include through their own processes and actions, or possibly through agreements with other parties such as MCs and DNSPs.

AEMO notes that the vast majority, if not all, disconnection service requests are transacted via the B2B system, using the B2B Procedures<sup>7</sup>. Provisions exist in the B2B Procedures for the management of other sensitive transactions such as life support notifications. Retailers and other interested parties might consider that provisions could be established in the B2B Procedures to assist in controlling the risk of a customer being wrongfully disconnected – for example, a mutual obligation might be established that requires both the requesting and actioning parties to a disconnection service request (or perhaps any other service request) to ensure that the party who raised the request remains authorised on the day the request is to be actioned. Such a requirement might reduce the risk of a wrongful disconnection in the fringe case scenario considered by Powershop, as both the requesting party (the losing retailer) and the

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<sup>7</sup> Governed by the Information Exchange Committee in accordance with NER clause 7.17



actioning party (the MC) would carry a mutual obligation to ensure that all disconnections are conducted on the request of an authorised party.

AEMO considers that the timeframe for implementation of the changes for customer switching enables retailers and other interested parties to establish processes to support management of disconnections, including consideration of any proposals to the IEC regarding changes to obligations in the B2B Procedures.

Accordingly, AEMO has determined to maintain the approach proposed in the Draft Report regarding notifications of pending and completed customer switches.

Matters raised regarding consumer protections are not within the remit of AEMO procedures or this consultation, however AEMO notes that many of the matters raised were addressed directly by the AEMC in their consideration of the rule change request associated with this consultation<sup>8</sup>.

## **4.2. Retrospective customer switches for customers with manually read metering installations**

### **4.2.1. Issue summary and submissions**

In the Draft Report, AEMO extended the timeframe within which a previous reading date can be used to facilitate a customer switch for connection points with manually read metering installations, from 15 business days to 65 business days (essentially a period of three calendar months), in order that retailers can reduce their reliance on the use of estimated<sup>9</sup> readings provided at the time of switch request by instead selecting a previous Actual<sup>10</sup> reading.

This approach was generally well supported; however, several concerns were raised for AEMO's further consideration regarding the use of previous reading dates and rules that might apply to them.

AGL commented that customer switches for customers with manually read interval meters should only occur on an Actual read provided by the MDP, or a Final<sup>11</sup> substituted meter read, and requested that AEMO consider developing system controls to prevent the use of estimated read transfers for customers with these arrangements. AGL commented that switching these customers on estimate readings would lead to rebills and credits, as highlighted by AEMO in previous papers to this consultation. ERM Power supported this view. Red/Lumo Energy proposed that where previous readings are to be used, they should be restricted to Actual or Final readings, to provide the retailer with access to the most accurate reading available.

AGL proposed that any reading marked as a Final reading for manually read interval meters, be 'locked', in that it must not change regardless of the MDP subsequently obtaining superior readings, to provide greater confidence in the use of a reading marked as Final for customer switches.

Red/Lumo Energy opposed the extension of retrospective transfers from 15 to 65 business days, commenting that it will impact wholesale settlement, network settlements and regulatory reporting. Red/Lumo cited their reporting requirements to the AER on matters such as numbers of hardship customers and concession customers<sup>12</sup> as being compromised because of retrospective customer switching. Red/Lumo commented that enabling 65 business day retrospectivity will undermine the integrity of AEMO reports and the data it provides to the market.

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<sup>8</sup> AEMC Reducing customers' switching times (retail) RRC0031. Available at: <https://www.aemc.gov.au/rule-changes/reducing-customers-switching-times-retail>

<sup>9</sup> In this paper a reference to an estimated read is a substituted read in the procedures.

<sup>10</sup> Meter data with a quality flag of 'A' as described in AEMO's Metrology Procedure: Part B, Clause 2.4.

<sup>11</sup> Meter data with a quality flag of 'F' as described in AEMO's Metrology Procedure: Part B, Clause 2.4.

<sup>12</sup> As required in accordance with the AER Performance Reporting Procedures and Guidelines





With regard to network bills, Red/Lumo suggested that prudent retailers may automatically object to any network invoices until any risk of retrospective transfer has occurred (e.g. 65 business days from the last date on any invoice) and that this would impact network revenue, which will lead to additional costs being passed on to customers. Energy Australia noted that network invoice reconciliation is a matter of contention between DNSPs and retailers today.

Red/Lumo also commented that customers will be impacted, particularly where customers are on payment plans and bill smoothing arrangements, and that limiting the retrospective timeframe to 15 business days will reduce impacts on the customer. Whilst supporting the changes made by AEMO, PIAC and Powershop highlighted the matter of billing reversals for customers on monthly plans who switch retailer retrospectively, recommending that it be monitored, with Powershop commenting that Ombudsman schemes will need to be cognisant of this feature.

ERM Power commented that AEMO has not considered the wholesale contract risk of transferring large multi-site customers comprising of many sites up to a period 65 business days retrospectively. ERM Power proposed that this risk is unmanageable when numerous small sites are involved in the loss of a large multi-site customer retrospectively, immediately altering the losing retailer's hedging position.

Momentum Energy saw value in the extension to 65 business days, noting that this change almost guarantees that at least one previous Actual read is available for meters that are manually read on a quarterly basis. Both Momentum and Energy Australia commented that access to a retrospective Actual reading was likely to be a more favourable option than using an estimated reading to complete a customer switch.

#### **4.2.2. AEMO's assessment**

The ability to use a previous reading date for manually read metering installations has been enabled primarily to provide an alternative to the use of estimated readings for customer switches. Its use also provides the potential for customers to retrospectively obtain access to better pricing and to avoid part-period billing (as detailed in the Draft Report and previous consultation material). Limiting the use of the previous reading to Actual and Final meter readings appears reasonable, in particular as the extension to 65 business days was to provide the optimum timeframe for prospective retailers to identify and where possible use, an Actual or Final reading obtained within the last quarterly reading cycle<sup>13</sup>.

The concept of 'locking' Final meter readings as proposed by AGL is problematic for two reasons:

- Impact on the customer – if superior information becomes available over time regarding the customer's energy usage, locking Final readings would sustain a known inaccuracy in customer billing; and
- Impact on market participants – similar to the effect on the customer, the calculation of energy settlement and network billing would be sustained on data that is known to be inaccurate.

Matters similar to the concept of locking Final readings were considered by the AEMC in their determination of the rule change request associated with this consultation. In section 5 of the AEMC's final determination, consideration was given to the undercharging and overcharging rules in the NERR<sup>14</sup>. The AEMC determined that no changes were needed to the provisions in the NERR; a view that was supported by a broad range of interested parties. Whilst not identical in design, locking a Final would have a distortionary affect akin to the mechanism considered by the AEMC in the rule change

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<sup>13</sup> AEMO notes that whilst select groups of manually read meters might be read more frequently than quarterly, the vast majority of manually read meters are read via quarterly cycles.

<sup>14</sup> AEMC Reducing customers' switching times (retail) RRC0031. Available at: <https://www.aemc.gov.au/rule-changes/reducing-customers-switching-times-retail>



In the Draft Report AEMO commented that on consideration of submissions and discussions at that time, customers on payment plans will not be materially impacted by an extension from 15 to 65 business days for retrospective customer switching. The determination mentioned above regarding undercharging and overcharging provisions in the NERR provide clarity on the obligations on retailers regarding the provision of a credit for any overpayment on the part of the customer, the credit for which might then be used to off-set the next bill from their new retailer for the retrospective period. AEMO also noted that it is reasonable to consider that in the process of obtaining explicit informed consent to commence a retrospective customer switch, the gaining retailer will consider such matters to minimise confusion to their prospective customer.

Regarding a retailer's potential exposure to the wholesale market, this matter was considered in the Issues Paper and the Draft Report. AEMO did not consider that a retailer's potential exposure to the wholesale market was of material concern to the extent that it prevents the use of previous read dates for customer switching. AEMO considered that the risk remains low, even with an extension to the use of a previous reading date up to 65 business days in the past, for reasons including:

- The extension would be limited to manually read metering installations and therefore, small customer connections with limited individual loads;
- Manual reading dates are not determined by any specific group of retailer's customers, rather they are determined primarily on the basis of operational efficiency and are proportionately spread across any quarterly reading cycle, limiting the likelihood of a material volume of customers switching away in a manner which leaves a retailer exposed;
- The use of the previous reading is one of many methods by which a competing retailer might determine to perform a customer switch; and
- For gaining retailers, there is no compulsion to offer or to select the use of a previous reading date for a customer switch.

Retailers can limit their own exposure and are arguably incentivised as a result of this mechanism to:

- Install remotely read metering at their customers' connection points, thereby removing the opportunity for the use of the previous read date for competitors seeking to win their customers; and
- Retain customers by offering competitive pricing and services.

In the example provided by ERM Power, where a large multi-site customer comprising of many connection points transfers retrospectively, AEMO considers that the points raised above have relevance. The incumbent retailer is the sole party empowered within the NER who can eliminate any risk of exposure to wholesale settlement by installing remotely read metering across the multiple sites for the large customer. To the extent that the retailer chooses to not install remotely read metering, the risk might be managed or otherwise accounted for via the contract established with the customer. If neither of these methods are adopted, and the retailer is exposed to the customer switching away prior to the end of their agreed term with no recourse to the customer, the impact is mitigated by virtue of the fact that previous reading dates will be randomly scattered over the previous quarterly reading cycle and other mitigating factors as listed above.

AEMO notes that retrospective customer switches occur in the current market and whilst the ability to use previous read dates might increase volumes of retrospective customer switches, the matters of concern raised regarding network invoices and reporting to the AER are possible increases to known and established features of the customer switching process, rather than new issues that require new solutions. Matters regarding network invoicing are not for consideration within AEMO procedures; rather they are subject to the agreements between DNSPs and retailers; retrospective changes are similarly a feature which should reasonably be considered in such agreements and supporting processes.





With regard to the accuracy of AEMO reporting, AEMO can confirm that reports published will represent the information that is accurate at the time of report creation, acknowledging that over time this information might change due to the dynamics of the competitive retail market. For example, the settlement process, and associated reports, is specifically designed to accommodate retrospective changes of role and improvements in the quantity and quality of data (connection point and energy data) over time as represented in the preliminary, final and revision processes.

#### **4.2.3. AEMO's conclusion**

AEMO considers that the use of estimated meter readings is the simplest and most effective method to enable customers with manually read metering installations to access new products and services in no more than two business days, as is demonstrated by the extensive experience witnessed in like-markets overseas.

AEMO continues to recognise the desire by many retailers to avoid the use of estimated meter readings and as a result, maintains the view expressed in the Draft Report that the facility to use a previous reading should be extended to a 65 business day period for connection points with manually read metering installations. This will enable retailers to reduce their reliance on the use of estimated readings provided at the time of switch request by instead selecting a previous actual reading. AEMO is persuaded that the use of the previous reading should be limited to readings where an Actual or Final reading has been provided. AEMO systems will include validation to ensure that customer switches seeking to use the previous reading are aligned with a date where an Actual or Final reading was taken. This is consistent with the intent in extending the retrospective period from 15 to 65 business days.

The comment provided by Red/Lumo regarding compliance with the AER reporting requirements as been referred by AEMO to the AER for consideration as part of any future review of the AER Performance Reporting Procedures and Guidelines.

### **4.3. Raising Change Requests in relation to obtaining explicit informed consent**

#### **4.3.1. Issue summary and submissions**

In the Draft Report AEMO determined to include requirements which would enable the timeframe within which customer transfers complete to be recorded, monitored and if required, reported on. AEMO amended the existing requirements within the MSATS Procedures that specify the point at which a customer switch must be raised by way of a CRC in MSATS by a retailer, and how that relates to the date upon which a customer provides explicit informed consent (EIC) for that switch to proceed (MSATS CATS Procedure v4.7 section 2.2(b)).

These requirements were amended in order that the MSATS Procedures allow retailers to select the most appropriate method to perform a switch, whilst enabling AEMO to record and measure timeframes within which customers are being switched from one retailer to another. The amendments considered the potential variations that might reasonably be adopted by a retailer when seeking to switch a customer and accordingly, the timeframe provided to retailers to raise Change Request Codes (CRCs) applied differently depending on whether the retailer is switching a customer prospectively or retrospectively.

In summary:

- For prospective switches, the retailer must raise the CRC in MSATS no later than one business day of obtaining informed consent from the customer.
- For retrospective switches, the retailer must raise the CRC in MSATS no later than one business day following the end of the relevant cooling-off period.



Compliance with these requirements allows retailers to use customer switching processes to best meet their customers' needs whilst enabling the timeframe for completion of customer switching activity to be reported on. AEMO provided examples of various methods of conducting a customer switch and how the timeframes for raising a CRC would apply in the Draft Report.

AEMO noted that, from time to time, information might be requested from retailers to demonstrate their compliance with these requirements, to ensure that outcomes for customers can be monitored and enforced if necessary. AEMO noted that the NER requires compliance with MSATS Procedures, provides that AEMO may notify retailers of breaches and requires AEMO to advise the AER and relevant jurisdictional authorities of ongoing breaches.

In submissions to the Draft Report, and discussions with a number of interested parties, clarity has been sought regarding the point at which EIC is obtained and whether the requirements for raising CRCs are reasonable as a result.

Some retailers commented that in certain circumstances there might be delays in the process that would reasonably suspend the raising of a CRC by the retailer following obtaining EIC from the customer, such as identifying that a customer's NMI or address are not confirmed (a delay being warranted to ensure a positive customer experience). It was also noted to AEMO that there may be a delay for those customers who elect to receive a hard-copy of the welcome pack in preference to electronic communication methods – therefore the date of verbally agreeing to initiate the customer switch might not be the same date as the customer providing EIC. EnergyAustralia suggested that AEMO consider and outline potential exceptions to the +1 business day rule. For example, that the timeframe does not commence until EIC to enter a market retail contract has been provided or a standard retail contract is in place, and that relevant and required customer information is established.

#### **4.3.2. AEMO's assessment**

AEMO does not consider that the requirements regarding EIC operate to enable AEMO to outline potential exceptions to the +1 business day rule. Retailers must determine how they intend to comply with the requirements for obtaining EIC within the flexibility provided by requirements as listed below and the changes to the MSATS Procedures regarding customer switching processes.

A retailer must obtain the EIC of a customer to:

- Transfer the customer to the retailer from another retailer (NERL, section 38(a)<sup>15</sup>); and
- Enter into the relevant customer retail contract, before the retailer requests the transfer (NERR, rule 57(1)(a)).

The customer gives EIC where:

- The retailer has clearly, fully and adequately disclosed all matters relevant to the consent of the customer (NERL, section 39(1)(a)); and
- The customer gives consent to the transaction in writing, verbally or by electronic communication (NERL, section 39(2)).

The customer has the right to withdraw from the contract within 10 business days commencing with the date the customer receives the "required information" about the contract (NERR, rule 47(1),(2)). This is information (NERR, rule 64(1)) in relation to:

- Prices, charges and benefits to the customer, early termination payments and penalties, security deposits, service levels, concessions or rebates, billing and payment arrangements, etc;

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<sup>15</sup> Note that where references are made to the NERR, there are corresponding requirements in the Essential Services Commission of Victoria Codes. Only NERR references are made in this paper for simplicity.



- Contract commencement, duration, extension and termination;
- Operation and implications of electronic transactions;
- Customer's rights in relation to withdrawing from the contract during the
- Cooling off period; and
- Customer's rights in relation to complaints.

This "required information", when given in a written disclosure statement, must be accompanied by a copy of the market retail contract (NERR, rule 64(2)).

AEMO notes that whilst there is clarity in the MSATS Procedures regarding the timeframe by which a participant needs to respond to a request from AEMO for information regarding their compliance with the raising of objections to CRs, there is no corresponding requirement to provide clarity on the timeframe by which a retailer, or other participant, needs to respond to AEMO with respect to other MSATS compliance requirements, including in respect of raising CRCs. AEMO considers that providing clarity on these matters in the MSATS Procedures would be beneficial to AEMO and market participants in complying with the requirements of NER clause 7.16.2(c) and (d) regarding compliance with the MSATS Procedures. The requirement for responding to a request to produce evidence to AEMO to substantiate the raising of an Objection Code was fair and reasonable, being within one business day of a request by AEMO. For more complex requests for information regarding compliance with the MSATS Procedures, a period of one business day appears unreasonably onerous so a period of five business days is to apply, consistent with other response timeframes in the MSATS Procedures.

#### **4.3.3. AEMO's conclusion**

AEMO considers that the point of obtaining Explicit Informed Consent (EIC) is a reasonable event by which to commence the customer switching process and that as retailers must record EIC, it is reasonable to consider that evidence of the same could be provided shortly after a request from AEMO.

To provide clarity on the timeframe by which a participant must produce evidence to AEMO to demonstrate compliance with the requirements of the MSATS Procedures, clause 2.1(e) of the MSATS CATS Procedure has been extended, and a period of five business days allowed to produce such evidence.

## **4.4. Timing and implementation**

### **4.4.1. Issue summary and submissions**

In the Draft Report AEMO determined to delay implementation, originally proposed for May 2020, in order that it can align with the planned schema change in December 2020 for the five-minute settlement program of work.

Whilst this change would delay the delivery of benefits to customers, AEMO considered that the potential impact to participants as a result of performing a schema change earlier than the planned schedule would be unreasonable. Aligning this work with the five-minute settlement schema change meant that there is no additional disruption to participants than that already planned for. AEMO noted that the December 2020 timing is equal to, or longer than the timing specified in the majority of retailer submissions to the Issues Paper and considered that retailers will have more than sufficient time to accommodate and plan for implementation. AEMO considered that it would be unreasonable to delay provision of the benefits of improved customer switching to customers beyond the planned implementation of five-minute settlements in July 2021, as proposed by two parties in submissions, in particular when considering the changes made in response to submissions to the Issues Paper as documented in the Draft Report.

The majority of submissions to the Draft Report supported the changes made to implementation and timing presented by AEMO. SA Power Networks (SAPN) remained concerned that due to the significant



internal program of work underway at SAPN, the proposed changes will add complexity and risk to a successful implementation of this program and impose significant cost that could be avoided by targeting an effective date of November 2021 or after; Energy Queensland commented that their strong preference was for implementation to be later in 2021 post-implementation of the five-minute settlement programme. PIAC questioned the need to delay until December 2020 which would delay benefits to customers, considering that AEMO has simplified the design provided in the Issues Paper, reducing the amount of change required to implement the new processes. Endeavour Energy suggested that to minimise impacts of the transition, the implementation date should be on a Sunday and proposed either 29 November 2020 or 6 December 2020, with the earlier date preferred because it would allow more time to resolve any issues prior to the start of the Christmas period.

Both Ausgrid and Endeavour Energy reflected on the transition approach, commenting that maintaining the ability to close off CRs raised prior to implementation under the current processes and enabling new processes for CRs raised following implementation would create complexities and instead favoured a 'hard cut-over' approach.

#### **4.4.2. AEMO's assessment**

AEMO's implementation proposals in the Draft Report were welcomed by the vast majority of respondents. AEMO acknowledges the concern raised by SAPN and Energy Queensland regarding competing priorities with pending market changes and the concern raised by PIAC regarding the delay of benefits to customers from the later implementation time.

Subsequent to the provision of submissions for AEMO's consideration, market participants have been working on preparedness and response to COVID-19. AEMO recognises the challenges created by COVID-19 and has taken this into consideration in addition to submissions and other feedback received from interested parties.

AEMO notes that further to the changes adopted in the Draft Report, this Final Report has accepted additional amendments, the effect of which is to remove risk or to further simplify the changes to customer switching. Examples of this include the introduction of validation for retrospective customer switches for connection points with manually read metering installations<sup>16</sup> and the introduction of validation to account for the removal of the BADMETER objection for CR1000, CR1010, CR1020, CR1023, CR1030 and CR1040 (see Table 1, item 40 regarding Table 4-N of the submission responses).

The timing for implementation should occur on a day in the week that is most practical and least disruptive to market participants. The proposal by Endeavour Energy to provide an implementation date which enables system changes to be deployed over a weekend appears both reasonable and consistent with market changes requiring cross participant system changes. To facilitate this implementation approach, the timing for implementation would be the midnight boundary between the Sunday and Monday, with the formal implementation date (effective date) being the Monday.

Regarding the approach to transition raised by the New South Wales- based distributors, AEMO acknowledges that for a period of up to 65 business days (the longest period by which a customer switch raised immediately prior to the effective date of these procedures can be programmed for) DNSP MDPs will have to cater for customer switches based on the use of the NSRD, in addition to the adoption and operation of the new framework. Whilst this is the default position (that was discussed in the initial consultation within the Issues Paper), AEMO considers that retailers are naturally incentivised to either avoid or significantly reduce the period under which both processes need to be used – primarily as the new processes enable their prospective customer to access their selected retailer and services faster and the retailer can gain the customer faster. As discussed in the Issues Paper, the planned transition method removes the need for parties to revert to, or otherwise reset expectation with, customers.

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<sup>16</sup> As discussed in section 4.2 of this Final Report



#### 4.4.3. AEMO's conclusion

AEMO recognises that effective development and deployment of system changes, for both the five-minute settlement and customer switching projects, is critical for their successful implementation and adoption. Given the challenges presented to market participants caused by the COVID-19 pandemic, and the substantial programme of work required to implement changes in support of the five-minute and global settlements rule, AEMO considers that an effective date of December 2020 is no longer prudent.

Accordingly, AEMO has elected to not specify the effective date in this Final Report. AEMO will further consult with market bodies and participants, and consider alternative implementation dates, that balance the needs of providing customers with access to faster switching against a reasonable timeframe to ensure the successful delivery of the changes for the benefit of consumers. AEMO will provide interested parties with notification of the effective date for the changes to procedures no less than eight months prior to them becoming effective.

AEMO intends to support the implementation of changes to customer switching to the fullest extent possible by encouraging the transition to the new processes for any transfers raised under the current mechanism. AEMO will also seek to provide an effective date that enables weekend system deployment as requested in submissions.

AEMO will continue to monitor the effects of COVID-19 and is working with the AEMC and stakeholders to review the delivery plans for this change and other regulatory reform. Once this work is completed, the effective date for changes to procedures for customer switching will be communicated.

## 5. OTHER MATTERS

AEMO has made a number of structural changes and drafting improvements to sections 1, 2, 3, 4, 5 and 6 of the MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations. These changes are designed to provide greater clarity, accessibility and remove duplication. These changes are not intended to materially change the obligations placed on MSATS Participants, including AEMO. AEMO has moved a number of items of a technical MSATS systems nature out of the obligations-based CATS Procedure into a technical documentation for IT business rules, functionality and validations that AEMO will provide separate to the procedures prior to the NEM Customer Switching effective date.

As a result of the consultation, various respondents highlighted additional minor amendments to the various procedures within the NEM Customer Switching consultation. Where the highlighted amendments did not change the meaning of the obligation, and AEMO considered they were beneficial for clarity or consistency, AEMO has made updates, as shown in the track changed versions published with this final determination.

As a result of feedback provided during this consultation and through the Electricity Retail Consultative Forum, AEMO notes it has changed the wording of Section 4.11.3 Meter Register Status Codes to reflect the meter register rather than the NMI level and disconnections rather than de-energisations.

## 6. FINAL DETERMINATION

Having considered the matters raised in submissions and at meetings, AEMO's final determination is to amend various retail electricity procedures in the form published with this Final Report, in accordance with Chapter 7 of the NER. There are four published final retail electricity procedure documents:

- MSATS Procedures: CATS Final Determination Change Marked;
- MSATS Procedures: CATS Final Determination Clean;



- MSATS Procedures: WIGS Final Determination Change Marked;
- MSATS Procedures: WIGS Final Determination Clean;
- Meter Data File Format Specification NEM12 & NEM13 Final Determination Change Marked;
- Meter Data File Format Specification NEM12 & NEM13 Final Determination Clean;
- Retail Electricity Market Procedures - Glossary and Framework Final Determination Change Marked; and
- Retail Electricity Market Procedures - Glossary and Framework Final Determination Clean.



## APPENDIX A. GLOSSARY

Term or acronym	Meaning
ACCC	Australian Competition and Consumer Commission
AEMC	Australian Energy Market Commission
CATS	Consumer Administration and Transfer Solution, a part of MSATS
COAG	Council of Australian Governments
CR	Change Request
CRC	Change Reason Code
DNISP	Distribution Network Service Provider
EIC	Explicit Informed Consent
ESC	Essential Services Commission
FRMP	Financially Responsible Market Participant
GSL	Guaranteed Service Level
HLD	High Level Design
LNSP	Local Network Service Provider
MC	Metering Coordinator
MDFF	Meter Data File Format
MDP	Metering Data Provider
MP	Meter Provider
MSATS	Market Settlements and Transfer Solution
NMI	National Metering Identifier
NEM	National Electricity Market
NER	National Electricity Rules
NERR	National Energy Retail Rules
NSRD	Next Scheduled Read Date
REPI	Retail Electricity Pricing Inquiry
WIGS	Wholesale, Interconnector, Generator and Sample NMIs

## APPENDIX B. SUMMARY OF SECOND STAGE SUBMISSIONS AND AEMO RESPONSES

**Table 1 MSATS Procedures: CATS Procedure Principles and Obligations**

No.	Section	Consulted person	Issue	AEMO response
1.	N/A	Intellihub	No comment	AEMO notes the respondent's comment.
2.	Version Release History 4.9	PLUS ES	Typo: December	Date has been corrected.
3.	2.1(e)(ii)	PLUS ES	PLUS ES proposes that 1 bus day timeframe can be very tight and suggests a timeframe of up to 2 bus days.	AEMO considers that given a reporting request will be on ad hoc basis for the raised Objection Codes and that participants must comply with the MSATS Procedures, evidence should be readily available to be provided within 1 business day from the request.
4.	2.2(a)	PLUS ES	<ul style="list-style-type: none"> <li>The objective of this clause is not quite clear, especially as it is against the new FRMP. One could say that the obligation applies both to the new or current FRMP. PLUS ES proposes a clarification of the clause.</li> <li>Typo with the word 'Coordinator'</li> </ul>	AEMO considers the clause reflects the requirement. The New FRMP is reflecting an appointment through the nomination of the retailer the New FRMP makes when they raise the CR. When the CR completes the FRMP becomes Current. AEMO has corrected the spelling.
5.	2.2(a)	Tango Energy	Reference is made to the NER throughout the Procedures, sometimes with the relevant NER clause details, other times not. For consistency and ease of reference can the relevant NER clause be provided whenever reference is made to the NER.  The above should also apply where Procedures and other documents are referenced; include the clause number.	AEMO's intent is to specify relevant NER clause details where possible, but otherwise, to refer generically to the NER.
6.	2.3(c)	Tango Energy	As this is already under 'The New FRMP must', suggest the following rewording:  (d) Initiate a Change Request for the transfer of a NMI in accordance with the applicable Timeframe Rules ensuring a customer transfer is raised no later than one business day following either:	AEMO agrees that the proposed changes improve the section.





No.	Section	Consulted person	Issue	AEMO response
			(i) for a prospective customer transfer, the day of obtaining explicit informed consent to commence the customer transfer; or (ii) for a retrospective customer transfer, the end of the relevant cooling-off period.  The subsequent clauses will need to be renumbered.	
7.	2.2(p)	Tango Energy	Suggest the following rewording as clause (q) provides the obligation and circumstances under which the Customer Classification Code must be updated/provided:  Establish the Customer Classification Code within five business days of the NMI Status Code becoming 'A' in MSATS.	The wording on this clause has been updated.
8.	2.2(q)	Tango Energy	Suggest the following rewording: Update or provide the Customer Classification Code as per the following:	The wording on this clause has been updated.
9.	2.4(h) and (l)	Tango Energy	As the MDP is required to provide the Actual Change Date for other change of role transactions e.g. Change of MDP (6200/6210), Change MPB or MPC or Both (6700/6701) and Change Multiple Roles (6800/6801), should it be change to:  Provide the Actual Change Date for Transfers and Change of Roles...	The wording on this clause has been updated.
10.	2.4(m)	CitiPower Powercor	CitiPower Powercor seeks clarification whether this clause also includes a MRIM RWD (AMI) meter type. If so, we recommend this be stated in the clause.	AEMO confirms that this clause includes the MRIM RWD (AMI) meter type. When a transfer completes (participants receive a COM notification) and if the MDP has not received an RDAT, then the MDP will need to provide meter data.

No.	Section	Consulted person	Issue	AEMO response
11.	2.4.m	Endeavour Energy	<p>This clause should make it clearer that a substituted reading is only required when:</p> <ul style="list-style-type: none"> <li>a valid change request with a read type code of RR was raised; and</li> <li>a Data Request has not been received <u>and</u> the <u>Actual Change</u> Date does not align with an actual read date</li> </ul> <p>If an invalid CR Code and Read Type Code combination is raised then the MDP should not be obligated to create a substituted reading. Ideally this should be rejected by MSATS or objected by the MDP.</p> <p>The requirement to create a substituted reading is only required when both a Data Request was not received by the MDP and there is not an aligning read to the Actual Change Date. Note that reference to Actual Change Date is more appropriate because the creation of the substituted reading should only occur when the CR status is COMPLETE.</p> <p>We suggest that this clause be updated to:</p> <p>Where a Data Request has not been received for a valid CR Code and Read Type Code combination and the Actual Change Date does not align with an actual read date, for Type 4A, 5 or 6, then a substituted reading must be provided upon completion of a retail transfer in accordance with the Service Level Procedure (MDP)</p>	AEMO refers to the technical documentation for IT business rules, functionality and validations that AEMO will provide separate to the procedures prior to the NEM Customer Switching effective date.
12.	2.4(m)	Evoenergy	Grammar: Remove on of the duplicate full stops.	Agreed, the wording on this clause has been updated.
13.	2.4(m)	United Energy	United Energy seeks clarification whether this clause also includes a MRIM RWD (AMI) meter type. If so, we recommend this be stated in the clause.	AEMO refers to the response in Table 1, item 10.
14.	Table 3-A	Tango Energy	Change to ' Code Updates.'	AEMO notes that 'Codes' is the correct terminology. AEMO refers to the technical documentation for IT business rules, functionality and validations that AEMO will provide separate to the procedures prior to the NEM Customer Switching effective date.
15.	3.3(a)	Tango Energy	<p>Changes to the information regarding an End User connection point can occur independently of a transfer. Is there are reason for referencing the transfer in this clause?</p> <p>Suggest the following rewording:</p>	AEMO agrees that the proposed changes improve the section.



No.	Section	Consulted person	Issue	AEMO response
			(a) The facility by which a Participant interacts with MSATS in order to effect a change in data to some or all aspects of information regarding an End User connection point which includes:	
16.	3.3(e)	Tango Energy	(e) does not follow from the opening and either needs to be reworded or in a separate section.	AEMO notes that section 4.2(d) sets out the relevant obligations concerning address information, so has removed the old section 3.3(e).
17.	3.3(f)	Tango Energy	Suggest the following rewording: To be assigned only one DLF code.	AEMO agrees that the proposed changes improve the section.
18.	3.4(a)	Tango Energy	Is this saying a transaction will Complete unless an Objection is received? It is understood a Change Request can Complete once all Objections have been withdrawn or will be cancelled if the objection is not withdrawn in the applicable timeframe. Also a Change Request can be rejected at the time of completion if data has subsequently been changed since the CR was submitted making it invalid. Suggest rewording or deleting the clause.	Yes, not all transactions have objections raised against them and should complete. However, there is CR specific validation run at the time of completion, that means some CRs will not complete due to failing validations, e.g. missing core data. AEMO has replaced the reference to "transactions will be approved" with "transactions will progress", in the interests of logic and consistency.
19.	3.4(B)	Red Energy and Lumo Energy (Red and Lumo)	Red and Lumo note that the ERCF has potentially agreed on a timeframe for cancellation of CR6800s which was greater than the 730 day period. We suggest that AEMO consider reviewing this to align with the potential outcome from the ERCF.	AEMO notes the approval to proceed through the ERCF with the change proposal regarding the timeframe for the cancellation of CR6800s, however, note that this is not valid for clause 3.4(b). AEMO notes the change proposal is related to the Note for section 2.9 and is outside the scope of this consultation.
20.	3.4(c)(vi)	Tango Energy	Suggest the following rewording: (vi) have available the data items as governed by the Change Reason Code.	AEMO agrees that the proposed changes improve the section.
21.	3.4(g)(i)	Tango Energy	Consider removing the text highlighted in red. It is understood multiple objections may be received but each objection will not contain detail of all objections lodged.	AEMO agrees that the proposed changes improve the section.
22.	4.2	Tango Energy	Suggest the following rewording:	AEMO agrees that the proposed changes improve the section.



No.	Section	Consulted person	Issue	AEMO response
			A Change Request contains CATS Standing Data items. The data items will vary depending on the Change Request initiated by the Participant. Each Change Request has a Change Reason Code. The Change Reason Codes govern the population of data in a Change Request.	
23.	Table 4A	Tango Energy	In section 7.1.3 it states: (b) For a CR1061 by the most recent previous FRMP.	The MSATS system only contemplates 'New FRMP' and 'Current FRMP' roles, however, the most recent previous FRMP is the same as the MSATS system role of the 'New FRMP'. The wording has contemplated the appropriate terminology.
24.	4.7	Tango Energy	Suggest the following rewording: The Objection Codes defined in Table 4-D are the only basis on which Participants can Object to a Change Request. Raising of an Objection is conditional on Participant's ability 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 to produce such evidence.	AEMO agrees that changes along the lines proposed improve the section.
25.	Table 4D - DATEBAD and Table 6-F	Tango Energy	The FRMP is removed from the definition indicating that for Error Correction transfer 1023 the FRMP will not be able to object to the transfer if the New FRMP uses a proposed change date that is not the same date as that on which the NMI transferred to the current FRMP. However, in Table 6-F the current FRMP can object – DATEBAD.	Agreed, the wording on these sections has been aligned.
26.	Table 4D - DECLINED	Tango Energy	The New FRMP may nominate the RP (MC) in the 10X0 yet there is no ability or timeframe in which the RP may object if they have been nominated in error. Please explain how this will be corrected and include in the Procedures.	There are no DECLINED objections for the RP on the customer switch transactions. The obligation is on the FRMP to correctly appoint the MC as per the rules and reflect that appointment by nominating the MC in CR10xx series. Error corrections are available via the CR6xxx series for erroneous nominations. An incorrect nomination of an MC should not delay a customer's desire to switch.
27.	4.10.1	Tango Energy	Suggest the following rewording: The FRMP must provide an End Users Customer Classification Code within five business days of becoming aware the value in MSATS is not populated. Refer Table 4-F.	AEMO agrees that changes along the lines proposed improve the section.

No.	Section	Consulted person	Issue	AEMO response
			The FRMP must update an End Users Customer Classification Code within five business days of becoming aware the value in MSATS is incorrect. Refer Table 4-F.	
28.	Table 4-M	Origin Energy	<p>Origin Energy does not support the removal of the Read Type Code NS (Next Schedule Read Date - NSRD). Estimated meter readings may be the simplest and most effective method to enable customers with manually read meters to transfer, however it is limiting a customer's choice on the read they want to use to transfer and believe it is imperative to give customers this choice. If a customer's NSRD is for example within a week, then Retailers can discuss with the customer whether they want to wait for the actual read or are happy to transfer on an estimated read. This provision will then allow the customer to choose what is most suitable for them.</p> <p>Origin Energy would support the introduction of a timeframe to be able to use the NSRD in a transfer when it occurs in the immediate future.</p> <p>Suggested changes to wording in Table 4-M – Read Type Codes - NS</p> <p>Advice from New FRMP to MDP that the Proposed Change Date for the End User transfer is the NSRD, which is, therefore, a date <i>no more than 12 business days</i> in the future. No other Meter Reading is required.</p> <p>An acceptable date is a window that is up to <i>3 business days</i> before or <i>2 business days</i> after the published NSRD.</p> <p>If the date proposed by the New FRMP is not within this same window (i.e. up to <i>3 business days</i> before or <i>2 business days</i> after), the MDP must advise the FRMP that there is a problem with the date proposed within 2 days of receipt of the Data Request.</p> <p>If the <i>meter</i> is read outside this window, the MDP is not obliged to provide an Actual Change Date CR 1500.</p> <p><a href="#">Applies to types 4A, 5 and type 6 metering installations.</a></p>	<p>The changes made to the procedures and processes for customer switching will provide more flexibility and options for retailers that will enable them to determine how best they meet their customer's preferences and enact the customer's choice than is currently the case. Options available to Retailers for switching customers will include switching retrospectively on a previous reading, switching immediately on an estimated reading or a smart meter reading, using a special reading for a date in the future, or specifying an agreed date upon which the switch will occur (either by estimate reading or smart meter reading). Further, AEMO have removed restrictions that prevented customers from switching to their selected retailer within the cooling-off period.</p> <p>AEMO refers Origin Energy to the case for NSRD retention that was discussed and considered in the Draft Report and Determination (section 4.4.) published in December 2019.</p>
29.	4.13 - Table 4-M – Special Read	PLUS ES	<p>PLUS ES proposes the following:</p> <ul style="list-style-type: none"> <li>add the following text to the description of SP, The MDP/MPC is to arrange for the Special Meter Reading upon receipt of a ServiceOrderRequest and remove clause 4.13 (b) or</li> <li>remove the following sentence from the SP Description: The MDP/MPC is to arrange for the Special Meter Reading.</li> </ul>	AEMO agrees that changes along the lines proposed – to move the detail from section 4.13(b) to Table 4-M – improve the section.

No.	Section	Consulted person	Issue	AEMO response
30.	4.13	Tango Energy	<p>Suggest the following rewording:</p> <p>(a) The Read Type Code indicates to the MDP either a specified Meter Reading is to be used, or no Meter Reading is required to affect the transfer.</p> <p>(c) The Read Type Code relates to the Proposed Change Date. Is the example in (C) necessary?</p>	AEMO agrees that changes along the lines proposed improve the section.
31.	4.13.c	Endeavour Energy	<p>The example provided in this clause is misleading because the Proposed Change Date for a CR is not the date on which the Special Read is to occur. The date on which a Special Read will occur is dependent on the date nominated in a Special Read Service Order.</p> <p>We suggest that this clause be updated to:</p> <p>In each case the Read Type Code is a direction relating to the Proposed Change Date, noting that a Read Type Code of SP requires a B2B Service Order.</p>	Proposed Change Date does not have to align with the Actual Change Date that the SP transfer completes upon. Service Order request date is an instruction to the MDP.
32.	Table 4-M, code PR	Endeavour Energy	<p>We note that the term 'Meter Reading' is defined in the glossary as 'Electricity consumption data taken from a meter, regardless of how it is obtained'. This suggests that the metering data must be an Actual.</p> <p>However, we understand that the PR Code is now no longer restricted to an Actual and that the transfer can also occur on substituted metering data, except for CR1040 which can only occur on an Actual. Could you please confirm this?</p> <p>If a transfer can occur on substituted metering data when PR is used then we suggest that the description be updated to:</p> <p>Advice from the New FRMP to the MDP that the transfer is to occur on an existing Actual Metering Data or existing Substituted Metering Data. If the metering data does not already exist then the MDP will not create the Substituted Metering Data and the transfer will not be completed. Note that for CR1040, the transfer can only occur on an existing Actual Metering Data.</p>	Customer Switches using a 'PR' Read Type Code will now be required to align to a Previous Read Date with a Quality Flag of 'A' or 'F'. AEMO intends to validate this scenario.
33.	Table 4-M – Previous Read Date	Tango Energy	<p>Suggest the following rewording:</p> <p>Advice from the New FRMP to the MDP that the transfer is to occur on a previous Meter Reading, taken within the previous 15 business days.</p>	AEMO agrees that changes along the lines proposed improve the section.



No.	Section	Consulted person	Issue	AEMO response
34.	Table 4-M, code RR	Endeavour Energy	<p>It should be made clearer that a read type code of RR will not result in a field visit, or the MDP waiting for a field visit to be completed, in order to obtain an Actual Read.</p> <p>We suggest that part (i) of this description be updated to: The Proposed Change Date, that will become the Actual Change Date for the End User transfer, is to be the date of the substituted metering data if an existing Actual Meter Reading for this date does not exist. Note that the use of this read type code will not result in a field visit.</p>	The wording on this clause has been updated. AEMO notes that the 'Note' at the end of Endeavour's suggestion has not been taken up, because on a basic meter, the only way to get a read is via field visit. For an RR, this won't be driven by a service order or Retailer Request.
35.	Table 4-M – Read Required	Tango Energy	<p>Suggest the following rewording: Advice from the New FRMP to the MDP that: (1) The Proposed Change date, that will become the Actual Change Date, is to be the date an Actual Meter Reading or substituted metering data, as appropriate, was obtained.</p>	The wording on this clause has been updated.
36.	Table 4-M, code SP	Endeavour Energy	<p>It should be made clearer that the transfer will only occur on an Actual Read when the read type code of SP is used.</p> <p>We suggest that this description be updated to: Advice from New FRMP to MDP that a B2B Service Order has been/will be provided to arrange for a physical site visit to undertake a reading to facilitate an End User transfer. The MDP/MPC is to arrange for the Special Meter Reading. If an Actual Meter Reading cannot be obtained then the transfer will not be completed. Applies to type 4A, 5 and type 6 metering installations.</p>	AEMO notes that a transfer on a SP is always an actual read, however, feel the update to this wording is not required.
37.	4.13 (d)	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland seeks clarification of what should occur when an EI read type code is received for a BASIC meter.	AEMO will provide validations to ensure that the Read Type Code and Metering Installation Type Code combination is correct.
38.	4.13 (d)	Energy Queensland Pty Limited on behalf of	Energy Queensland notes that Table 4-N has been updated to reflect the valid combinations of Read Type Code to CR code to Meter Read Type. However, given that there are no objections available to these CRs, there is potential for Metering Data Providers (MDPs) to receive a meter reading	AEMO intend to validate the Read Type Code and Metering Installation Type Code and are aligning with Energy Queensland's proposed Option 1.



No.	Section	Consulted person	Issue	AEMO response
		its participant entities	<p>request on a customer transfer that cannot be fulfilled. For example, CR1000 received with PR read type code for a BASIC meter.</p> <p>Energy Queensland believes that either:</p> <p>1) The proposed no objections should remain on Customer Transfers, with the Australian Energy Market Operator (AEMO) completing validation on these CRs to ensure that only valid combinations of ReadTypeCode/CR/Meter Read Method is received, or</p> <p>2) The proposed no objections remain on Customer Transfers, with MDPs able to complete a substitution on any Read Type Code received.</p> <p>Energy Queensland supports proposal 1) above where AEMO is completing the validation of Customer Transfer CRs upon submission. This will ensure that there is incentive to provide the correct information in the CR, as well as ensure the MDP fulfils its obligation to meter readings as required.</p>	
39.	Table 4-M – Special Read	Tango Energy	<p>Suggest the following rewording:</p> <p>Advice from the New FRMP to the Current MDP a B2B Service Order is provided to arrange for a physical site visit to undertake a reading to facilitate an End User transfer.</p> <p>The MDP/MPC is to arrange for the Special Meter Reading.</p> <p>Applies to type 4A, 5 and type 6 <i>metering installations</i>.</p>	AEMO agrees that changes along the lines proposed improve the table.
40.	Table 4 N and Clause 14.4(b)	Ausgrid.	Table 4N allows a PR type code to be used for a remotely read meter for a CR1000, however clause 14.4(b) states previous read date and quality will only be provided where the Metering Data Type is Manually read. These seem to contradict each other.	Changes to table 4N and Previous Read definitions have resolved this issue.
41.	Table 4 N and Clause 14.4	Ausgrid.	AEMO has stated that if a CR1010 is submitted with a read type code of PR and this date does not align with MSATS, the transaction will be rejected. If a meter is read monthly (say first business day of each month) and a retailer wants to submit a retrospective transfer back 2 months the previous read date will not align as a new read has been submitted and updated unless AEMO proposes to store all previous read dates in MSATS. However, the definition of Previous Read Date does not seem to support historical dates prior to the previous read date.	AEMO intends to provide all previous read dates over the previous 12 months. Previous Read Dates definition will be updated to reflect it covers 'dates'. AEMO refers to the technical documentation for IT business rules, functionality and validations that AEMO will provide separate to the procedures prior to the NEM Customer Switching effective date.





No.	Section	Consulted person	Issue	AEMO response
			Previous Read Date definition is "A date held by MSATS as the last time a Meter Reading was provided to market."	
42.	Table 4-N	Endeavour Energy	We note that the BADMETER objection for CR1000, CR1010, CR1020, CR1023, CR1030 and CR1040 has been removed. Could you please confirm if MSATS will now validate for a valid read type code, CR code, proposed change date and meter type combination as per table 4-N and reject any invalid CRs? If MSATS does not perform all these validations then we suggest that the BADMETER objection be re-instated. If neither of these are adopted then we believe that this will cause inefficiencies in the transfer process.	AEMO refers to the response in Table 1, item 37.
43.	Table 4-N	Endeavour Energy	The first note under table 4-N should have 1023 removed because CR1023 has it's own column in table 4-N. We suggest that that this note be updated to: Note: 102X refers to 1020, 1025 and 1029.	Agreed, the wording on this note has been updated.
44.	Table 4-N	Evoenergy	Removal of change request objection code for BADMETER: Due to changes to the Read Type Codes and allowing transfers on estimations, there needs to be a MSATS Validation against the Change Reason Code (CRC) and the correct Read Type Codes. This is to ensure that a transfer is not completed on an non actual reading when the retailer wanted an actual read transfer only (Move in on actual only). Or an Objection code needs to be introduced to allow us to object when the incorrect CRC and Read Type Code combination has been used.	AEMO refers to the response in Table 1, item 37.
45.	Table 4-N	Origin Energy	Origin Energy would like to reiterate that customer choice is paramount when determining what read to use when transferring between Retailers and the removal of the NS read type is contrary to improving the customer switching process. If this option is removed and the only option for the customer to gain an actual transfer read is through a special read request, then this would mean customers will incur an additional cost to transfer.	AEMO refers to the response in Table 1, item 28 regarding table 4-M, AEMO refers Origin Energy to the case for NSRD retention that was discussed and considered in the Draft Report and Determination (section 4.4.) published in December 2019.
46.	Table 4-N		Red and Lumo believe that AEMO should retain the use of code CR (Consumer Read) and ER (Estimated Read) as valid read type codes to create clear differentiation for consumer transfers types outside of the RR transfer type. This will not only allow for clear delineation in the transfer method for retailers but would also assist with the automation of systems and provide a	The CR read type code is not relevant to the process in MSATS and has therefore been removed. The use of customer self-readings in customer switching was considered by AEMO and the AEMC in the rule change related to this consultation.



No.	Section	Consulted person	Issue	AEMO response
			valuable reporting tool on methods of transfers between retailers. We are concerned that the use of (RR) read required for all transfers will create confusion and have unintended consequences.	No compelling case has been provided for the retention of the ER read type code. AEMO considers that the retention of the ER code is more likely to have unintended consequences than its deletion (for example, if an ER code was used and an actual reading was available, what would be returned?), and that simplification of read type codes are less likely to lead to human or process error.
47.	4.14	PLUS ES	<p>1. <i>The Previous Read Date and Previous Read Quality Flag are values provided that specify the date of the previous metering reads and metering data quality flags that were provided to the market. PLUS ES proposes rewording:</i></p> <ul style="list-style-type: none"> <li>Remove 1st 'provided' or</li> <li>reword to : The Previous Read Date and Previous Read Quality Flag are values provided to the market that specify the date of the previous metering reads and metering data quality flags.</li> </ul> <p>2. AEMO in their response to Table 3 Item 36 have stated:</p> <p>a. <i>AEMO notes where a CRC does not align to a previous read date, for PR read types AEMO will validate a read exists for that date (regardless of quality) and reject.</i></p> <p>PLUS ES seeks clarification whether AEMO will be validating against the PR code when used for remotely read meters. i.e. CR1000 or CR1040?</p> <p>3. Clause 4.14 (b) states : The Previous Read Dates and Quality Flags will only be provided where the Metering Data Type is Manually Read. Is 'provided' referring to the NMI discovery? Perhaps a clarification should be made.</p>	<p>1. Agreed, the wording on this clause has been updated.</p> <p>2. AEMO note that remotely read can't use PR and the validation doesn't apply to CR1040.</p> <p>3. Yes, AEMO is providing this data in NMI Discovery (NMID). This clause has been reworded.</p>
48.	4.14	Tango Energy	<p>Suggest the following rewording:</p> <p>(a) Previous Read Date and Quality Flag</p> <p>The Previous Read Date and the Previous Read Quality Flag are values provided to the market specifying the date of the previous meter reading and the associated metering data quality for that read.</p>	The wording on this clause has been updated.



No.	Section	Consulted person	Issue	AEMO response
			(b) The Previous Read Date and Quality Flag will only be provided where the Metering Data Type is Manually Read.	
49.	Table 4-O	Red and Lumo	Red and Lumo believe that AEMO should remove the ability for S Substitute to be an option for last reading data. We believe that only Actual and Final reads should be used for last read quality and associated retrospective transfers. While the presence of a last read substitute can still be published this should not be capable of being used as a transfer, as this would mean the last bill from that retailer would not be the final bill for the retailer as it would almost certainly be updated when actual reads become available. This would erode confidence for consumers in the transfer process.	AEMO refers to the response in Table 1, item 32.
50.	6	Ausgrid.	As the CR1000 can be used as a retrospective CR for retail transfer for remotely read metering installations, will transactions be validated and incorrect transactions cancelled? Eg. a retrospective transfer request where a Type 4A, 5 or 6 metering installation is associated with the NMI. Eg. a retrospective transfer request with a read type code of SP.	AEMO refers to the response in Table 1, item 37.
51.	6	Ausgrid.	CR1010 is for manually read installations only. Will transactions be validated and incorrect transactions cancelled? If not being validated, the procedures must allow the current MDP to object using BADMETER.	AEMO refers to the response in Table 1, item 37.
52.	6 – CR10xx	PLUS ES	Having removed most objections from the MDP PLUS ES seeks clarification if AEMO will be validating that the parameters provided meet the criteria, such as, the correct CR and CR code for meter types are used. i.e CR1000 is rejected if a retrospective transfer is required for a manually read meter, a 4a meter with a read type code EI etc . If not, PLUS ES suggests that some objections are re-instated for the current MDP.	AEMO refers to the response in Table 1, item 37.
53.	6.1.1	Endeavour Energy	In the initial consultation phase we raised the following: We note that some CR Codes have the words ‘move-in’ in their title (for example CR1030, CR1040) while others do not (for example CR1000). For the latter it is not clear if these CRs can be used for in-situ only or for both in-situ and move-in. Given that move-in can only transfer on an actual read while an in-situ can transfer on an actual or substituted read, we believe the procedure	AEMO notes that CR1000 is for all possible situations excluding a move in. CR1030 and CR1040 is for the specific scenario of move in and have been labelled to indicate the single specific scenario. Therefore, CR1000 will not be labelled a single specific scenario.

No.	Section	Consulted person	Issue	AEMO response
			<p>should be made clearer to identify which CR code can be used for which scenario.</p> <p>AEMO’s response was:</p> <p>Whilst AEMO agree with the intent to provide clarity, AEMO are cautious about limiting CR labels that may be exclusionary.</p> <p>We also noted that no change was made based on our feedback.</p> <p>Currently all transfers must occur on an actual read, therefore there is little impact if the incorrect CR code was used. However, in future transfers must continue to occur on an actual read for certain scenarios, eg move-in transfers, while in other scenarios the transfer can occur on substituted read, eg in-situ transfers. We believe that the procedures should clearly define which CR code should be used for which scenario to avoid confusion and poor customer experience. Making the procedure silent on this matter will lead to participants defining their own definitions. For example with the CR1000 and CR1010 currently silent, a participant could take the view that there is no restriction on the scenario it could be used for and therefore could use these CR codes for a move-in using a substituted reading. Although this against the principle of the new transfer design, it would not be against the procedure because the procedure is silent on this matter.</p> <p>We suggest that each CR code clearly defines the scenario it is allowed to be used for. See our comments below for each CR code.</p>	<p>The Read Type Code will determine the type of read used to effect the transfer. The definition of the Read Type Code should reflect appropriate scenarios.</p> <p>For the CR1040, the MDP has the ability to object where the code ‘PR’ is used and there is no previous read.</p>
54.	6.1.1 CR1000	Endeavour Energy	<p>The term Special Read is not a defined term and for ease of reading and to avoid confusion, the description of each CR should have a consistent structure.</p> <p>We suggest updating the description to:</p> <p>Prospective Day – a date nominated by the new FRMP for the transfer to occur on actual or substituted metering data, as defined by the Read Type Code. Applies to all Metering Data Type and must not be used for a move-in scenario.</p>	<p>AEMO notes the respondent’s comment and the wording on this clause has been updated.</p>
55.	6.1.1 CR1010	Endeavour Energy	<p>For ease of reading and to avoid confusion, the description of each CR should have a consistent structure.</p> <p>We suggest updating the description to:</p>	<p>AEMO notes the respondent’s comment and the wording on this clause has been updated</p>

No.	Section	Consulted person	Issue	AEMO response
			The date of transfer is on a Retrospective Day – a date that aligns with the Previous Read Date, which can be either actual or substituted metering data. The Metering Data Type must be Manually Read and must not be used for a move-in scenario.	
56.	6.1.1 CR1020	Endeavour Energy	CR1020 is an error correction CR. For consistency we suggest that details of CR1020 be moved to section 6.2 and remove the words 'small NMLs' from the title of section 6.2	AEMO has moved the error correction CR1020 to section 6.2 and renamed Section 6.1.
57.	6.1.1 CR1020	Endeavour Energy	For ease of reading and to avoid confusion, the description of each CR should have a consistent structure. We suggest updating the description to the following if it is maintained in section 6.1: The date of transfer is on a Retrospective Day – a date that is agreed between the Current FRMP and New FRMP provided that it aligns with actual or substituted metering data. Applies to all Metering Data Type. We suggest updating the description to the following if it is maintained in section 6.2: Used where the actual transfer date was in error and the Current FRMP and New FRMP have agreed on new transfer date.	AEMO notes the respondent's comment and the wording on this clause has been updated.
58.	6.1.1 CR1030	Endeavour Energy	For ease of reading and to avoid confusion, the description of each CR should have a consistent structure. We suggest updating the description to: The date of transfer is on a Prospective Day – a date nominated by the new FRMP for the transfer to occur on actual metering data. Applies to all Metering Data Type and must be used for a move-in scenario.	No major changes have been proposed to the Move-In CRs as such the definition has not been amended.
59.	6.1.1 CR1040	Endeavour Energy	For ease of reading and to avoid confusion, the description of each CR should have a consistent structure. We suggest updating the description to: The date of transfer is on a Retrospective Day – a date nominated by the new FRMP for the transfer to occur on actual metering data. Applies to all Metering Data Type and must be used for a move-in scenario.	No major changes have been proposed to the Move-In CRs as such the definition has not been amended.



No.	Section	Consulted person	Issue	AEMO response
60.	6.1.1	Energy Queensland Pty Limited on behalf of its participant entities	<p>Energy Queensland would like confirmation on how the market will enforce that a Retrospective Day CR1000 must be Remotely Read when no objections are available to Participants if a CR is provided that is for a meter that is not remotely read.</p> <p>Per previous comments in section 4.13 (d), Energy Queensland supports proposal 1) where AEMO complete validation of the Customer Transfer CR upon submission.</p>	AEMO refers to response for Table 1, Item 37
61.	6.1.1	Energy Queensland Pty Limited on behalf of its participant entities	<p>Energy Queensland seeks confirmation on how the market will enforce that a CR1010 must take place on the date of a previous meter reading if that previous meter reading does not exist.</p> <p>Per previous comments in section 4.13 (d), we support proposal 1) where AEMO complete validation of the Customer Transfer CR prior to submission.</p>	AEMO refers to the response in Table 1, Item 32.
62.	6.1.1	Tango Energy	<p>Section 6.1 applies when one of the following Change Reason Codes applies: Similar wording to that above is included in all sections. Is there a reason for this? If not suggest removing it.</p>	AEMO agrees that changes along the lines proposed improve the relevant sections.
63.	6.1.2.b	Endeavour Energy	<p>This clause does not align with what is described in section 6.1.1. We suggest that this clause be updated to: For Change Reason Code 1000, 1030 and 1040 the NMI Classification Code is SMALL or LARGE. For Change Reason Code 1010 the NMI Classification Code is SMALL. For Change Reason Code 1020 the NMI Classification Code is not SMALL.</p>	The procedures only specify the NMI Classification Code where there is a specific restriction or exclusion applied.
64.	6.1.2	Energy Queensland Pty Limited on behalf of its participant entities	<p>Energy Queensland seeks confirmation on how the conditions precedent for a CR1010 related to it being SMALL and manually read will be enforced.</p> <p>Per previous comments in section 4.13 (d), we support proposal 1) where AEMO completed validation of the Customer Transfer CR data upon submission.</p>	AEMO refers to the response in Table 1, Item 37.



No.	Section	Consulted person	Issue	AEMO response
65.	6.1.3	Tango Energy	Please reinstate the separate clauses for 'Must 'and May' to add clarity to the New FRMP's obligations. Should (e) read: Must withdraw the transfer request where the NMI Classification Code is SMALL, if advised by the Current MDP a Meter Reading cannot be obtained in response to a Read Type Code of SP;	The order of clauses d & e have been swapped. Additionally, the classification for small has been removed.
66.	6.1.3(a)	PLUS ES	Delete repeated word 'must'.	Agreed, the wording on this clause has been updated.
67.	6.1.3 (c)	Energy Queensland Pty Limited on behalf of its participant entities	Please refer previous comments in 6.1.1.	AEMO refers to the response in Table 1, Item 37.
68.	6.1.4 (b)	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland seeks confirmation that the SP clause now allows the SP meter reading to be taken on any date after the CR1000 or CR1030 transaction date, provided it is in response to a special read/transfer read request raised by the same Financially Responsible Market Participant (FRMP). Further to this, we believe that the amendment to this clause indicates that the current -3+2 day window restriction no longer applies.	The timeframe requirements to provide the SP meter reading have not changed and are not the same as the NSRD timeframes.
69.	6.1.4(b)(i)	PLUS ES	Delete CR1010 and CR1040 from this clause. Table 4-N does not support the use of SP read type code for these CRs.	Agreed, the wording on this clause has been updated.
70.	6.1.4(b)(ii)	CitiPower Powercor	CitiPower Powercor believes this clause is inconsistent with the B2B Service Order procedure, where the MDP (LNSP) has an obligation to send a service order response within five business days of completing the work requested. We recommend the CATS procedure and this clause be aligned and updated to state <i>'the MDP must advise the New FRMP of the failure within five business days of the Special Read Date.'</i>	AEMO notes that it has not made any changes to the current obligations. If there are current issues with timeframes, then AEMO suggests that CitiPower Powercor raise an ICF to the ERCF with statistics to support change request.



No.	Section	Consulted person	Issue	AEMO response
71.	6.1.4(b)(ii)	United Energy	United Energy believes this clause is inconsistent with the B2B Service Order procedure, where the MDP (LNSP) has an obligation to send a service order response within five business days of completing the work requested. We recommend the CATS procedure and this clause be aligned and updated to state <i>'the MDP must advise the New FRMP of the failure within five business days of the Special Read Date.'</i>	AEMO notes that it has not made any changes to the current obligations. If there are current issues with timeframes, then AEMO suggests that United Energy raise an ICF to the ERCF with statistics to support change request.
72.	6.1.4 (c)	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland seeks confirmation on whether the read type code of Read Required (RR) is the only read type code where the Retailer will expect a substituted reading on a Customer Transfer CR.	AEMO notes that RR can be prospective and EI can be prospective, and both read type codes could have substituted readings.
73.	6.1.5	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland believes that this clause related to MC Requirements is no longer required as the MDP, MPC (Category C Metering Data Provider) and MPB (Category B Metering Provider) roles can no longer be changed using the CR1000 series CRs (as per section 6.1.3 - FRMP Requirements).	AEMO notes the clause specifies the use of other CRs and will retain the clause.
74.	6.1.5	Tango Energy	Suggest the following rewording: The MC must ensure MDP, MPC and MPB roles are correct and if not raise the appropriate Change Request to update them. Refer to sections 12.1 to 12.8 for Change Requests relating to Role Changes.	Agreed, the wording on this clause has been updated.
75.	6.1.7	AusNet Services	AusNet Services notes that AEMO has covered the scenario where a FRMP attempts to incorrectly nominate an Initial MC (LNSP) for a NMI where the MC was previously a contestable MC. However, the reverse scenario, where a contestable MC is nominated for a site with non-contestable metering type (particularly VICAMI where there is no intention to churn the meter to Type 1-4). This has the potential to expose the LNSP's MDP and MPB unnecessarily to possible SLA breaches. To resolve this scenario, once it has been identified, the FRMP will need to raise a CRC 63XX to return the initial MC back into the role. Rather than simplify the transfer process, the option put forward by Simply Energy and adopted by AEMO seems to move the role assignment issue further down the chain. AusNet Services proposes to limit the scope of	AEMO notes the respondent's comment and believe the case is reasonable for Option 2, however, we note that your analysis is correct for Victoria and that this will be corrected via the CR6xxx.





No.	Section	Consulted person	Issue	AEMO response
			switching CR's in MSATS so that only the retailer role is changed in the transfer process, as per AEMO's initial Option 1.	
76.	6.1.7	Endeavour Energy	We note that the DATEBAD objection is not available for CR1010. Could you please confirm if MSATS will validate for a valid proposed change date with the Previous Read Date? If MSATS does not perform this validation then we suggest that the DATEBAD objection be re-instated. If neither of these are adopted then we believe that this will cause inefficiencies in the transfer process.	AEMO refers to the response in Table 1, item 32.
77.	6.1.7	Endeavour Energy	We note that the MDP may raise a NOACC objection for CR1040. However CR1040 cannot have a read type code of SP therefore this objection code is not appropriate. We suggest that the NOACC objection be removed from CR1040.	AEMO notes that service orders for transfer CRs are not exclusive to a special read service order, for example, when a move in re-energisation is required. The use of SP in the case of a move in re-energisation is not appropriate and, therefore, has not been made available to CR1040, however, an MDP may have a no access situation for which they can use the NOACC objection.
78.	6.1.7	Energy Queensland Pty Limited on behalf of its participant entities	Please refer previous comments in 6.1.1.	AEMO refers to the response in Table 1, item 37.
79.	6.1.8	AusNet Services	AusNet Services proposes that the LNSP retain all Notifications for Pending Role Changes for CRC's 10XX. In instances where the MC = LNSP, there are processes in place that rely on early notification of a FRMP change to ensure that a previously requested De-energisation for the current FRMP is cancelled when a pending FRMP change is identified. This process requires the notifications be received in the role of the LNSP. If the LNSP loses visibility of the pending change they may inadvertently disconnect a newly installed customer, increasing wrongful disconnections. This is not considered an acceptable risk considering the intent of the change is to stop 'save' processes which the LNSP does not perform.	AEMO refers to the response provided in the Final Report section 4.1 and Table 6, item 4.



No.	Section	Consulted person	Issue	AEMO response
80.	6.1.8	PLUS ES	<p>PLUS ES understands from AEMO that notifications to RP, MPB and LNSP have been removed to mitigate 'save' activities.</p> <p>PLUS ES seeks clarification why the notifications have been removed from the current LNSP and current RP in the CR1020 when the Current FRMP is receiving all the notifications.</p> <p>PLUS ES suggests these notifications are allowed if the current FRMP is to receive them.</p>	Current FRMP gets to see it to understand an error correction is underway and a customer is coming back after the Current FRMP has asked for the customer to return. Retailer has ability to object to this process.
81.	Table 6 - Objection Rules for CRC 1000	AusNet Services	AusNet Services proposes that the Current MDP role retain the 'BADMETER' objection code for this CRC in order to object to instances where Retrospective CRC 1000 has been raised on a Manually Read Metering Type.	AEMO refers to the response in Table 1, item 37.
82.	Table 6 - Objection Rules for CRC 1010	AusNet Services	AusNet Services proposes that the Current MDP role retain the 'BADMETER' objection code for this CRC in order to object to instances where a CRC 1010 has been raised on a Remotely Read Metering Type.	AEMO refers to the response in Table 1, item 37.
83.	Table 6-A	Origin Energy	Origin Energy do not support a retrospective transfer period of 65 business days as it would trigger rework to repay any payments already billed and paid by the customer. This issue is compounded when it is done on a estimated reading. Origin Energy support a more reasonable retrospective transfer period of 10 business days which will reduce any billing impacts. In addition, to be financially fair and equitable between the previous and new retailers in billing, basic meter customers should only transfer on an 'Actual Read' or 'Final Substitution' (as it cant be replaced by an actual read).	AEMO refers to the response in Table 1, item 32. Monthly billing was considered in previous stage, the approach to enable an extended retrospective transfer up to 65 business days was based on feedback including consumer representatives.
84.	Table 6-A	Tango Energy	CR1010-Change Retailer-Retrospective has been reinstated with a Retrospective period of 65 business days. Previously it was 10 business days. Is the increase in days correct? If so, how is this justified?	AEMO refers to the response in Table 1, item 32 and Table 1, item 83.
85.	Table 7-B	Tango Energy	The Objection rules for CR 1010 have been deleted. Is this correct as the CR1010 has been reinstated?	No objection rules as the CR1010 has been aligned with other CR10xx customer switches and validation will be applied.
86.	6.2.1	PLUS ES	<p>PLUS ES assumes formatting error; suggest deleting the below rows:</p> <ul style="list-style-type: none"> <li>Top row empty</li> </ul>	Agreed, the formatting on this clause has been updated.



No.	Section	Consulted person	Issue	AEMO response
			<ul style="list-style-type: none"> <li>3rd row empty excluding a bulletpoint.</li> </ul>	
87.	6.2.1 - Application [1023 1025 1029]	Tango Energy	<p>Suggest removing the following as it is clear in 6.1 the 1020 is used for Large NMIs:</p> <p>Please note that the appropriate Change Request for a LARGE NMI is CR 1020 – Change Retailer – Retrospective – Long Term/Error (not SMALL9). More information about this Change Request is provided in Section 6.1.</p>	CR1020 has been moved to the error correction section and clause 6.2.1 has been deleted.
88.	6.2.1 - 1029 – Other Error Corrections (SMALL only)	Tango Energy	<p>Suggest the following rewording:</p> <p>These must be reasons other than those covered by CR1023 and CR1025.</p>	Whilst we've reduced the number of error corrections, AEMO prefers to keep the reasons as generic as possible to allow for changes over time.
89.	6.2.4(g)	PLUS ES	<p><i>or leave this action to the New MC to complete.</i></p> <p>PLUS ES suggests that this sentence is not required and should be removed. Section 6.2 is about small NMIs – MCs for Small NMIs cannot correct MC nominations. Allowing this sentence almost implies that the FRMP:</p> <ul style="list-style-type: none"> <li>does not have to meet their obligation as per clause 2.2(a) and</li> <li>they can leave it up to the MC to notify them of the incorrect nomination via an off line tool for the FRMP to then raise a CR63xx.</li> </ul>	Agreed, the wording on this clause has been updated.
90.	6.2.4(g)	Tango Energy	Should the 'or' statement also be included in 6.1.3 FRMP Requirements?	Agreed, the wording on this clause has been updated.
91.	6.2.8	Endeavour Energy	For easier reading and consistency the allowable objection codes should be listed in alphabetical order within each table.	Agreed, the wording on this clause has been updated.
92.	6.2.8	Endeavour Energy	<p>We note that the MDP may raise a DECLINED objection for CR1029. However the MDP cannot be nominated for CR1029 therefore this objection code is not appropriate.</p> <p>We suggest that the DECLINED objection be removed from the MDP for CR1029.</p>	Agreed, the wording on this clause has been updated.
93.	7 – 1060 & 1061	Evoenergy	Will the losing retailer have a process in place to cancel any B2B Service Orders issued or any CR68xx raised also. What will the win back retailers process do? If physical meter change already actioned, what will they do?	Retailers have sufficient obligations which would incentivise them to cancel SOs outside of the MSATS Procedures.



No.	Section	Consulted person	Issue	AEMO response
94.	7 - Reverse and Provide Data – Proposed new CR 1060	TasNetworks Pty Ltd	<p>TasNetworks requests that AEMO consider repurposing an existing change request (example 1026) for the purpose of reversing the FRMP role due to customer cooling off, in place of the proposed new CR 1060 transaction.</p> <p>TasNetworks considers that by doing this it may alleviate the need for participants outside of Victoria to develop and implement a new transaction into their existing systems.</p> <p>Should this option be viable, it would allow some participants the option of remaining on the existing (n-1) schema version until participants' systems are upgraded as a consequence of 5MS changes.</p> <p>TasNetworks feels this would be beneficial from the point of reducing the development and testing effort for such participants and software vendors, along with reducing impacts to 5MS project timelines and deliverables.</p>	AEMO refers to the discussion Section 4.7 of the Draft Report noting the benefits of establishing a separate reversal process. AEMO notes a new CR does not require a schema change, CRs are configuration. The changes to NMID are the driver for a schema change to be associated with this consultation.
95.	7.1.5	Tango Energy	<p>Suggest the following rewording:</p> <p>When preparing a Change Request the initiating FRMP must ensure the date of Completion for the previously Completed Change Request is not greater than the period shown in Table 7-A.</p>	Agreed, the wording on this clause has been updated.
96.	7.2	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland seeks confirmation of the specific situations (CR code/Read Type/Metering Type) when an MDP is to provide a CR1500 to trigger the completion of a CR1000 series CR, given that there is no longer a logical connection between a CR with a Proposed Date and a CR1500 requirement.	<p>AEMO confirms:</p> <ul style="list-style-type: none"> <li>• If you receive an RDAT you are obliged to provide a CR1500</li> <li>• If you receive a COM you need to provide readings.</li> </ul>
97.	7.2.1	Tango Energy	<p>Should the below read New/Current FRMP?</p> <p>The MDP is required to provide MSATS with the Actual Change Date following the initiation of a Change Request by a FRMP or MC requiring an Actual Change Date.</p>	AEMO believe the term 'a FRMP' covers new/current FRMP.
98.	Table 15-C	Tango Energy	The Standing Data Access Rights are not populated for Previous Read Quality Flag.	AEMO notes that the Previous Read Quality Flag is not standing data rather data that is provided through NMID.

**Table 2 MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs**

No.	Section	Consulted person	Issue	AEMO response
1.	N/A	Intellihub	No comment	AEMO notes the respondent's comment.
2.	N/A	PLUS ES	n/a	AEMO notes the respondent's comment.
3.	N/A	Tango Energy	No Comment	AEMO notes the respondent's comment.
4.	2.1	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland notes the beginning of section 2.1 has a reference that requires updating.	Agreed, the wording on this clause has been updated.

**Table 3 Meter Data File Format Specification NEM12 & NEM13**

No.	Section	Consulted person	Issue	AEMO response
1.	General	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland notes that the Effective Date of the document is still referring to the previously proposed Effective Date.	AEMO has updated the effective date.
2.	General	PLUS ES	PLUS ES seeks clarification of the effective date of this document - 20 May 2020 vs the remaining Switching documents 2 December 2020?	This issue is considered in section 4.4 of the Final Report.
3.	Appendix E - Additional Reason Code 67	Ausgrid.	No Comment.	AEMO notes the respondent's comment.



No.	Section	Consulted person	Issue	AEMO response
4.	Appendix E - Additional Reason Code 67	AusNet Services	All other descriptions refer to 'Meter Readings' rather than 'Read', suggest rewording to "Meter Readings provided to facilitate a customer transfer".	Agreed, the wording on this clause has been updated
5.	Appendix E - Additional Reason Code 67	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland provides no comment.	AEMO notes the respondent's comment.
6.	Appendix E - Additional Reason Code 67	ERM Power Retail Pty Ltd	Retailers require the provision of a Substituted Read for the purposes of a transfer read within two days of the transfer completion date. It is unclear if this is captured.  To minimise system changes we require that the read quality should be specified S (Substitute) with reason 67. It is unclear from the document, what read type code should be used.	MDFF has a Quality Flag field that is to be provided with the meter readings. No additional change required.
7.	Appendix E - Additional Reason Code 67	Evoenergy	Nice	AEMO notes the respondent's support for the proposed change.
8.	Appendix E - Additional Reason Code 67	Intellihub	No comment	AEMO notes the respondent's comment.
9.	Appendix E - Additional Reason Code 67	Origin Energy	Origin Energy support the addition of reason code 67 "transfer".	AEMO notes the respondent's support for the proposed change.



No.	Section	Consulted person	Issue	AEMO response
10.	Appendix E - Additional Reason Code 67	Tango Energy	No Comment	AEMO notes the respondent's comment.

**Table 4 Retail Electricity Market Glossary and Framework**

No.	Section	Consulted person	Issue	AEMO response
1.	5. Glossary – Actual Meter Reading	Ausgrid.	Agree.	AEMO notes the respondent's support for the proposed change.
2.	5. Glossary – Actual Meter Reading	AusNet Services	Agreed.	AEMO notes the respondent's support for the proposed change.
3.	5. Glossary – Actual Meter Reading	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland provides no comment.	AEMO notes the respondent's comment.
4.	5. Glossary – Actual Meter Reading	Tango Energy	Suggest the following rewording: For Manually Read meters, `the accumulated data collected from the meter. For Remotely Read meters the interval metering data collected from the meter.	AEMO notes respondent's comments. The definition proposed is not accurate due to Manually Read meters having interval metering data – MRIM. The definitions have been amended to provide clarity.
5.	5. Glossary – CATS	AusNet Services	Agreed.	AEMO notes the respondent's support for the proposed change.



No.	Section	Consulted person	Issue	AEMO response
	Standing Data Access Rules			
6.	5. Glossary - Current [Participant/ Role]	Ausgrid.	Agree.	AEMO notes the respondent's support for the proposed change.
7.	5. Glossary - Current [Participant/ Role]	AusNet Services	Agreed.	AEMO notes the respondent's support for the proposed change.
8.	5. Glossary - Current [Participant/ Role]	Tango Energy	No comment	AEMO notes the respondent's comment.
9.	5. Glossary – Business Document	Tango Energy	According to the B2B Procedure there are six types of One Way notification: MeterExchangeNotification NetworkTariffNotification PlannedInterruptionNotification MeterFaultAndIssueNotification NoticeOfMeteringWorks NotifiedParty Suggest list all of these and removing OneWayNotifocation from the list.	AEMO notes the respondent's comment and suggest the definition is raised with the IEC for review.
10.	5. Glossary – Initial MC	Ausgrid.	Agree.	AEMO notes the respondent's support for the proposed change.
11.	5. Glossary – Initial MC	AusNet Services	Agreed.	AEMO notes the respondent's support for the proposed change.
12.	5. Glossary – Initial MC	Energy Queensland Pty Limited on behalf of	Energy Queensland provides no comment.	AEMO notes the respondent's comment.





No.	Section	Consulted person	Issue	AEMO response
		its participant entities		
13.	5. Glossary – Initial MC	Tango Energy	No comment	AEMO notes the respondent’s comment.
14.	5. Glossary - Manually Read	Ausgrid.	This definition has not been updated in the Glossary. Please Add. Suggest:  Local manual collection of <i>metering data</i> .	A definition of Manually Read has been added to the Glossary.
15.	5. Glossary - Manually Read	Endeavour Energy	This is not listed in the glossary. We suggest that this be added.	AEMO refers to the response in Table 4, item 15.
16.	5. Glossary - Manually Read	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland provides no comment.	AEMO notes the respondent’s comment.
17.	5. Glossary - Manually Read	Origin Energy	There is no definition of “ <i>Manually Read</i> ” rather it has been populated with “ <i>Metering Data Type - A value that describes how metering data is obtained i.e. Manually Read or Remotely Read</i> ”. This is a duplication as “ <i>Metering Data Type</i> ” has already been included.	AEMO refers to the response in Table 4, item 15.
18.	5. Glossary - Manually Read	PLUS ES	Definition missing from glossary.	AEMO refers to the response in Table 4, item 15.
19.	5. Glossary - Manually Read	Tango Energy	The definition for Meter Data Type appears twice. There is no definition of Manually Read.	AEMO refers to the response in Table 4, item 15.



No.	Section	Consulted person	Issue	AEMO response
20.	5. Glossary – Meter Data Type	Ausgrid.	Agree.	AEMO notes the respondent's support for the proposed change.
21.	5. Glossary – Meter Data Type	AusNet Services	This term does not exist in the second stage consultation document version; <a href="https://aemo.com.au/-/media/Files/Stakeholder_Consultation/Consultations/NEM-Consultations/2019/NEM-Customer-Switching/Second-Stage/Retail-Electricity-Market-Procedures--Glossary-and-Framework-v23-Draft-Consultation-Change-Marked.pdf">https://aemo.com.au/-/media/Files/Stakeholder_Consultation/Consultations/NEM-Consultations/2019/NEM-Customer-Switching/Second-Stage/Retail-Electricity-Market-Procedures--Glossary-and-Framework-v23-Draft-Consultation-Change-Marked.pdf</a>	AEMO notes the term has been corrected to 'Metering Data Type'.
22.	5. Glossary – Meter Data Type	Intellihub	'Metering Data Type'. Why is this mentioned twice?	Agreed, the wording on this clause has been updated.
23.	5. Glossary – Meter Data Type	Endeavour Energy	This is listed twice in the glossary. We suggest deleting one of the entries.	Agreed, the wording on this clause has been updated.
24.	5. Glossary – Meter Data Type	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland notes that the addition of "Metering Data Type" in the Glossary has been completed on Page 22 and is duplicated on Page 23. We suggest removal of one duplicate value.	Agreed, the wording on this clause has been updated.
25.	5. Glossary – Meter Data Type	Evoenergy	Why is it in the table twice, 1st under MAMP (delete this one), 2nd after Metering Data Notification Proces.	Agreed, the wording on this clause has been updated.
26.	5. Glossary – Meter Data Type	PLUS ES	Metering Data Type; This has been added twice in the Glossary. Once after MAMP and the next after Metering Data Notification Process.	Agreed, the wording on this clause has been updated.
27.	5. Glossary – Meter Data Type	Tango Energy	No Comment	AEMO notes the respondent's comment.



No.	Section	Consulted person	Issue	AEMO response
28.	5. Glossary – Metering Data Type	AusNet Services	This entry seems to be duplicated – once between ‘MAMP’ and ‘MarketNet’ and a second time between ‘Metering Data Notification Process’ and ‘Metering Data Validation Process’. Suggest removing the first entry.	Agreed, the wording on this clause has been updated.
29.	5. Glossary - New [Participant/ Role]	Ausgrid.	Agree.	AEMO notes the respondent’s support for the proposed change.
30.	5. Glossary - New [Participant/ Role]	AusNet Services	Agreed.	AEMO notes the respondent’s support for the proposed change.
31.	5. Glossary - New [Participant/ Role]	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland provides no comment.	AEMO notes the respondent’s comment.
32.	5. Glossary - New [Participant/ Role]	Tango Energy	No comment	AEMO notes the respondent’s comment.
33.	5. Glossary – Previous Read Date	Ausgrid.	Agree.	AEMO notes the respondent’s support for the proposed change.
34.	5. Glossary – Previous Read Date	AusNet Services	This field is intended to hold the date the last Meter Reading occurred, not the time meter reading was provided. It currently reads as the time the meter reading was provided, e.g. Meter Read on the 15/12/2019 Data Provided by MDP to Participants on the 16/12/2019. Suggest rewording to “A date held in MSATS indicating the last time a meter was read”	Changing to Previous Read Dates. Wording will be updated to define the dates.



No.	Section	Consulted person	Issue	AEMO response
35.	5. Glossary – Previous Read Date	Endeavour Energy	<p>We note that the term ‘Meter Reading’ is defined in the glossary as ‘Electricity consumption data taken from a meter, regardless of how it is obtained’. This suggests that the metering data must be an Actual. However, we understand that the Previous Read Date can correspond to either actual or substituted metering data. If this is correct then we suggest that the term ‘Meter Reading’ should not be used to define Previous Read Date.</p> <p>The current definition suggests that only one date will be held and therefore displayed to the retailer when they perform NMI Discovery. However, we understand that MSATS will display all the reading dates it has available within a defined period. This means that there may be more than one read date provided during NMI Discovery. IF our understanding is correct then we suggest that this definition be updated to make this clearer. We suggest the following definition: Dates corresponding to actual metering data or substituted metering data held within MSATS for an accumulation datastream</p>	Agreed, the wording on this clause has been updated.
36.	5. Glossary – Previous Read Date	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland provides no comment.	AEMO notes the respondent’s comment.
37.	5. Glossary – Previous Read Date	Tango Energy	No comment	AEMO notes the respondent’s comment.
38.	5. Glossary – Previous Read Quality Flag	Ausgrid.	Agree.	AEMO notes the respondent’s support for the proposed change.
39.	5. Glossary – Previous	AusNet Services	<p>Suggest including how the quality flag is determined.</p> <p>Suggest rewording to “A quality flag determined by MSATS for the <i>Previous Read Date</i> as provided by the <i>MDP</i> to the market ....”</p>	AEMO notes the quality flag is determined by MSATS rather than as provided by the MDP.



No.	Section	Consulted person	Issue	AEMO response
	Read Quality Flag			AEMO refers to the technical documentation for IT business rules, functionality and validations that AEMO will provide separate to the procedures prior to the NEM Customer Switching effective date.
40.	5. Glossary – Previous Read Quality Flag	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland provides no comment.	AEMO notes the respondent’s comment.
41.	5. Glossary – Previous Read Quality Flag	Tango Energy	No comment	AEMO notes the respondent’s comment.
42.	5. Glossary – Read Type Code	Ausgrid.	Agree.	AEMO notes the respondent’s support for the proposed change.
43.	5. Glossary – Read Type Code	AusNet Services	This description as per the draft does not read fluently and ‘MDP’ and ‘meter reading’ are defined terms and should be italicised. Suggest rewording to “Provides direction to the <i>MDP</i> on the type of <i>meter reading</i> to be used to facilitate a transfer. Applicable Read Type Codes are detailed in Table 4-M of the CATS Procedures”.	The wording on this clause has been updated.
44.	5. Glossary – Read Type Code	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland notes that the “Types of” at the start of this sentence should be removed.	AEMO refers to the response in Table 4, item 44.
45.	5. Glossary – Read Type Code	Tango Energy	Suggest the following rewording: The type of meter reading to be used to affect an End User transfer as provided to the MDP by the New FRMP. Refer to Table 4-M in the CATS Procedures.	AEMO refers to the response in Table 4, item 44.



No.	Section	Consulted person	Issue	AEMO response
46.	5. Glossary – Remotely Read	Ausgrid.	Agree.	AEMO notes the respondent’s support for the proposed change.
47.	5. Glossary – Remotely Read	AusNet Services	If we have provided a definition of ‘Remotely Read’, should we also include the definition for ‘Manually Read’? Suggest rewording to “Collection of <i>metering data by remote acquisition</i> ”	AEMO refers to the response in Table 4, item 44.
48.	5. Glossary – Remotely Read	Energy Queensland Pty Limited on behalf of its participant entities	Energy Queensland provides no comment.	AEMO notes the respondent’s comment.
49.	5. Glossary – Remotely Read	Tango Energy	No comment	AEMO notes the respondent’s comment.

**Table 5 Timing and implementation**

No.	Consulted person	Heading	Issue	AEMO response
1.	AGL Energy (AGL)	Timing and implementation	AGL welcomes AEMO’s determination to delay the implementation in order that it can align with the planned schema change in December 2020 for the five-minute settlement program of work. As we observed in our submission to the Issues Paper, we anticipate substantial associated system build requirements and testing to align with the proposed changes.	AEMO notes the respondent’s support for the later date, and the associated system build requirements.
2.	Ausgrid.	Timing and implementation.	AEMO is suggesting a staged approach and allow for existing transactions to continue after the cutover date. Ausgrid disagrees with this approach as we will have to maintain two systems and associated	AEMO understands that for a period of up to 65 business days (the farthest period by which a customer switch raised immediately prior to the effective date of these procedures can be programmed for) DNSP MDPs



No.	Consulted person	Heading	Issue	AEMO response
			<p>logic. Ausgrid believes this should be a hard cutover and any outstanding prospective CR1XXX should be cancelled and resubmitted by the retailer.</p>	<p>will have to cater for customer switches based on the use of the NSRD, in addition to the adoption and operation of the new framework. Whilst this is the default position (that was discussed in the initial consultation within the Issue Paper), AEMO considers that retailers are incentivised to either avoid or significantly reduce the period under which both processes need to be used – primarily as the new processes enable their prospective customer to access their selected retailer and services faster and the retailer can gain the customer faster.</p>
3.	Endeavour Energy	General	<p>A staged transition is proposed, whereby any CR raised prior to the go-live date will be allowed to continue until the end of that CR's life cycle. However, this would introduce system complexities, for participants and AEMO, in maintaining for 3 to 4 months two different set of rules. To eliminate this complexity we suggest a clean start approach whereby all open CRs are cancelled prior to go-live and new CRs are raised just after go-live. We believe that a clean start approach would not have any negative customer experience should the retailer manage the transition appropriately. For example, if in-flight CRs were closed and a new CR opened after go-live then for customers who are happy to transfer on a substituted read then they could be transferred sooner than having to wait for an actual read associated with the Next Scheduled Read Date. On the other hand, should the customer want to transfer on an actual read then this could be achieved by the retailer raising a CR1010 when the Next Scheduled Read Date has passed. Overall, the customer experience for a clean start approach is no worse than a staged approach and can provide an enhanced customer experience through a faster customer transfer should the customer agree to transfer on a substituted read.</p> <p>We also suggest that to minimise impacts of the transition, using any transition approach, the start date of this new procedure should be on a Sunday. Therefore, the start date should be either 29 November 2020 or 6 December 2020, with the earlier date preferred because it would allow more time to resolve any issues prior to the start of the Christmas period.</p>	<p>AEMO refers to the response in Table 5, item 2 and have changed the effective date as considered in Section 4.4.</p>



No.	Consulted person	Heading	Issue	AEMO response
4.	Endeavour Energy	General	The successful implementation of this change is important to ensure minimal impact to the market and customers who want to change retailers. We therefore suggest that AEMO manages this change as an industry project, which should include management of issues and risks, facilitation of industry testing, developing an industry transition and cutover plan, go-live criteria and readiness reporting.	AEMO will prepare communications and industry engagement proportionate to the scale of the change.
5.	Energy Queensland Pty Limited on behalf of its participant entities	Transitional arrangements for inflight CRs	Energy Queensland seeks further clarification on the transitional activities related to the Customer Switching changes. More specifically, we would like clarification on what transitional and inflight requirements will exist at Go Live for those CRs, read types and objection codes existing on inflight transactions that are now either invalid or have a different meaning.	At the time of becoming effective, there may be Change Requests in flight. While MSATS shall continue to allow these Change Requests to complete, they move to a completion/end state based on the configuration settings (i.e. notifications) effective as at the time of completion. All business process exceptions are expected to be managed directly by the Participants – i.e. cancellations etc.
6.	Energy Queensland Pty Limited on behalf of its participant entities	Effective Date of Document	Energy Queensland notes that the Effective Date of the document, 2/12/2020, is misaligned with the 5 Minute Settlement (5MS) and Global Settlement (GS) release date by three days. We suggest that this date is aligned with the 5MS and GS timeframe of 5/12/2020 which would facilitate better release scheduling, outage management and support for participants.	This issue is considered in section 4.4 of the Final Report.
7.	ERM Power Retail Pty Ltd	Timing and implementation	We support the delay over the initial proposed change. Our comments on cost benefit test stand given other competing priorities.	AEMO notes the respondent's support for the later date.
8.	MEA Powershop	General	Powershop is pleased with the outcome of the Draft Determination and the pragmatic approach to revise the go-live date to December 2020. This will allow more time for retailers to implement the required system changes, amend processes and train their team on the new market switching procedures.	AEMO notes the respondent's support for the later date.
9.	Momentum Energy	Timing and Implementation	Momentum reiterates its support for the proposed implementation in December 2020 as the changes can also be aligned with the required	AEMO notes the respondent's support for the later date.





No.	Consulted person	Heading	Issue	AEMO response
			transaction schema change. This was Momentum's preferred implementation time, as well as several other retailers, as there are several other market and regulatory changes scheduled for mid-2020.	
10.	PLUS ES	Inflight CR at go live	PLUS ES recommends that maintaining two sets of logic to support the transition should be avoided if possible.	AEMO refers to the response in Table 5, item 2.
11.	Public Interest Advocacy Centre (PIAC)	Timing and implementation	PIAC notes the timing for implementation of the proposed changes to AEMO procedures and systems has been deferred from May 2020 to December 2020 to align with the five-minute settlements program of work. We highlight AEMO has simplified the design provided in the Issues Paper, which will reduce the amount of change required to implement the new processes. Considering this lowered burden on retailers, PIAC is not convinced the implementation timeframe should be extended to December 2020 as this withholds benefits from consumers to avoid what may be minor costs to retailers.	This issue is considered in section 4.4 of the Final Report.
12.	Red and Lumo	Implementation date of the proposed changes	We understand that AEMO wishes to implement this change in December 2020 to align with the implementation of the new backend of MSATS. Dependent on AEMOs specific decisions around retrospective transfers, market notifications and nominations of multiple roles alongside a customer transfer, we cautiously support this date. However, we remain concerned about the risks of implementing these changes concurrently, and urge AEMO to have frank conversations with industry about its readiness and roll back plan should settlements and/or customer transfers be impacted.	AEMO notes the respondent's cautious support for the later date. AEMO will prepare communications and industry engagement proportionate to the scale of the change.
13.	SA Power Networks	Effective Date of these Changes	Given the changes already underway for other industry initiatives, SA Power Networks does not support an implementation date ahead of November 2021.  These proposed changes have major impacts to the current processes and systems used by SA Power Networks in performing our market role as an LNSP and MDP.  We have a significant internal program of work underway and the proposed changes will add complexity and risk to a successful implementation of this program and impose significant cost (both system	This issue is considered in section 4.4 of the Final Report.

No.	Consulted person	Heading	Issue	AEMO response
			<p>and operational) that could be avoided by targeting a effective date of November 2021 or after.</p> <p>We request that AEMO reconsider the currently proposed effective date of December 2020 to remove the impact and risk that this date will create for SA Power Networks and other market participants.</p>	

**Table 6 Other matters**

No.	Consulted person	Heading	Issue	AEMO response
1.	AGL	Generally supportive	<p>We are generally supportive of AEMO’s Draft Determination and consider the proposed approach will create a more effective procedural framework to facilitate timely customer switching in the NEM. We have identified a range of matters we would recommend be considered further to ensure an optimal customer experience, including:</p> <ul style="list-style-type: none"> <li>• Review the risks associated with disconnections in the absence of notification of a pending role changed to contracted parties and develop a process that enables notification to contracted parties (distribution network businesses) with safeguards to ensure this information is not shared with the current retailer;</li> <li>• In the context of prospective transfers for manually read interval meters (MIRM) (Type 5 or Type 4A), consider appropriate changes to AEMO systems to ensure that all transfers occur on an actual meter read (enabling ‘locking’ of estimated interval metering data to facilitate a superior customer experience and reduce the costs to retailers associated with these reconciliations);</li> <li>• In introducing new fields with the proposed Market Settlement and Transfer Solution (MSATS) schema changes, consider the introduction of a third new field (Last Actual Read) to support retailers’ transfer processes;</li> </ul>	<p>AEMO notes the respondent’s support for the proposed change and refers to the responses in the Final Report sections 4.1 and 4.2, Table 1, Items 32, and Table 6, items 37, 46 and 51.</p>

No.	Consulted person	Heading	Issue	AEMO response
			<ul style="list-style-type: none"> <li>In relation to cooling-off restriction changes, clarify the discrepancy between AEMO’s determination to remove the current restrictions to cooling-off (which would allow retailers discretion as to when the transfer is to be effected and its relationship with contractual cooling-off provisions) and the intended reporting requirements for retailers; and</li> <li>Clarify that MC appointment objection changes apply equally to prospective and retrospective transfers.</li> </ul>	
2.	AGL	AEMO’s system	<p>As we observed in our submission in response to the Issues Paper, in order support the primary objective of the AEMC’s rule determination and AEMO HLD, to modernise a transfer process that is no longer fit for purpose, we would strongly encourage AEMO to undertake appropriate system changes in relation to its own supporting operating systems. AEMO’s determination to delay the implementation of the proposed changes provides an opportune window to consider relevant AEMO system upgrades to best support these reforms. With the continued use of overnight batched systems, the potential remains for customers to experience delay in the transfer process. We would therefore encourage AEMO to develop appropriate real-time processes that can appropriately support an efficient and seamless customer experience in transferring between retailers.</p> <p>A modern real-time transfer system will also be an important precursor to the implementation of the Consumer Data Right (CDR) framework for the energy sector. In a market supported by the CDR framework, customers will expect to be able to receive and take advantage of offers in real-time, providing a seamless customer experience. We would therefore encourage AEMO to develop the necessary system changes now to ensure a well-functioning modern market into the future.</p>	AEMO notes the respondent’s comment and will take this into consideration at design and implementation, alongside other related IT projects. AEMO is committed to the continuous uplift of the solutions which underpin market operations and support positive consumer outcomes. AEMO thank and acknowledges the support of AGL in this regard.
3.	EnergyAustralia	General	AEMO’s draft determination has made positive changes to the rule changes proposed in the issues paper. Retailer’s concerns have been considered. Specifically, by the implementation timeframe being extended to December 2020, and AEMO proposing an extended period	AEMO notes the respondent’s support for the proposed change.



No.	Consulted person	Heading	Issue	AEMO response
			<p>for retrospective transfers as an alternative option to transferring on estimations.</p> <p>EnergyAustralia appreciates AEMO’s consideration of limiting changes in the draft determination to reduce the cost imposed on retailers, and the corresponding costs passed through to customers. We acknowledge the rule change has been created to adjust the customer transfer process in line with current technology and reasonable expectations of customers. We request AEMO continue to assess the proposed changes in view of the financial impacts on retailers, real benefit to customer, and consider where additional requests for rule changes to the AEMC are required.</p>	
4.	MEA Powershop	General	<p>There is further clarification required on practical transactional matters such as:</p> <ul style="list-style-type: none"> <li>• If a customer is switching on a retrospective transfer, and a de-energisation or some other form of service order has been raised (at the request of the customer or retailer), how would that service order be cancelled? This scenario does pose risks (regulatory and cost of cancelled works) and must be monitored by AEMO and other stakeholders; and</li> <li>• how customers and monthly billing retailers (such as Powershop) will be impacted by potential unintended consequences of a three month retrospective switch date for manually read meters.</li> </ul> <p>Powershop has provided comments below on the matters raised in this Draft Decision, including further expansion on the above dot points.</p>	<p>Further to the points discussed in the responses to the initial stage of consultation, note of cancelling service orders once a transfer is COM notified between midnight and 7am. Actions to address this may require adjustment to the ‘contract’ between retailer and distributor or have a process that cancels a service order when a transfer is COM prior to 8am.</p> <p>Monthly billing was considered in previous stage, the approach to enable an extended retrospective transfer up to 65 business days was based on feedback including consumer representatives.</p>
5.	Momentum Energy	Generally Supportive	<p>We acknowledge the comprehensive consultation that AEMO has undertaken with retailers and other stakeholders following the release of the AEMO Switching Issues Paper and the responses submitted. This has resulted in an improved understanding of the impacts of the change request from all stakeholders and facilitated some significant amendments to the Draft Report and Determination. These amendments will deliver vastly improved outcomes for customers and participants. We are particularly supportive of the following:</p> <ul style="list-style-type: none"> <li>• The amended timeline for implementation to at least December 2020;</li> </ul>	<p>AEMO notes the respondent’s support for the proposed change.</p>

No.	Consulted person	Heading	Issue	AEMO response
			<ul style="list-style-type: none"> <li>• Extension of the retrospective window for transfers on actual reads to 3 months (restricted to small customers with manually read meters);</li> <li>• The proposed changes to NMI Discovery, ensuring a robust solution, to providing visibility of previous actual reads and the quality of these reads when using retrospective actual reads for transfers; and</li> <li>• The provision of a new transaction that reverses a completed in situ customer transfer which may be raised by the retailer which raised the completed transfer request. This will allow customer transfers to be reversed, if a customer cools off, prior to the completion of the cooling offer period. Currently transfer reversals are challenging as they can only be raised by the original retailer.</li> </ul>	
6.	PIAC	General	PIAC broadly supports AEMO's proposed procedure changes and considers they will contribute to better consumer outcomes by reducing switching times for customers wishing to change electricity retailers.	AEMO notes the respondent's support for the proposed change.
7.	PIAC	General	We welcome AEMO's consideration of the impacts of proposed changes for customers with payment plans, debts, or with disconnections pending, and broadly consider the changes in process provide adequate safeguards against related negative customer outcomes.	AEMO notes the respondent's support for the proposed change.
8.	Red and Lumo	General	<p>We support the intent of customers being able to access their retailer and product of choice in a faster manner. However, Red and Lumo remain concerned AEMO has again failed to properly assess the impacts of its proposed changes and has proposed options which have a wide range of negative impacts (most notably retrospective transfer timeframes).</p> <p>AEMO has not undertaken a full industry-wide cost benefit assessment, and is progressing these changes irrespective of the costs that will be ultimately borne by consumers. We question whether without this assessment, AEMO can justify that it has met its regulatory requirements to make changes that are consistent with the national energy retail objective and the national electricity objective.</p>	AEMO refers to the responses provided in Table 13, items 5 and 7 of the Draft Report.



No.	Consulted person	Heading	Issue	AEMO response
9.	PLUS ES	AEMO validation of CRs	With the removal of the objections for CR10XX there is some ambiguity of what validations will be performed by AEMO. It will be beneficial to have some supporting document so that participants will understand how their processes may be impacted and amend accordingly.	AEMO notes it intends to provide supporting documentation on validations. AEMO refers to section 5 of Final Report about this documentation.
10.	AGL	Nomination of multiple roles alongside a change of retailer	AGL supports AEMO's determination to adopt the Option 2 proposal (Removal of the ability of Metering Coordinators to object to appointment) in the form suggested by Simply Energy, which would enable the MC role to be nominated in a 1000 series CR. As we noted in our submission in response to the Issues Paper, we consider this the most efficient option to nullify the risk of delay or cancellation to the switching process. This outcome delivers the best outcome for the customer and therefore aligns to AEMO's objective to deliver a transfer system that is in the long-term interest of the energy consumer while also minimising industry costs.	AEMO notes the respondent's support for the proposed change.
11.	ERM Power Retail Pty Ltd	Nomination of multiple roles alongside a change of retailer	We disagree with the restriction to appoint the Initial MC. If there is a network asset on site that is not faulty (this excludes family failures), retailers should be able to nominate the Initial MC to complete the transfer and decide whether a meter churn is required, and if so, which MC to nominate via a 63XX.	The restriction on the nomination of the Initial MC is limited to enable the removal of objection in the CR1000 series which would delay a customer switch. Once a switch is completed, the new retailer may seek to transfer the role of MC back to the Initial MC via the CR63xx series. If the appointment is invalid, the Initial MC will have a limited right to object to appointment at this time (i.e. the NMI no longer has type 5 or 6 metering, or a malfunction has previously been notified by the Initial MC).
12.	MEA Powershop	Nomination of multiple roles alongside a change of retailer	Powershop agrees with the draft determination of adopting option 2, being able to nominate a Metering Coordinator through a CR1000 series transaction.	AEMO notes the respondent's support for the proposed change.
13.	Momentum Energy	Nomination of multiple roles alongside a	We confirm our support for Option 2 that removes the ability for Metering Coordinators (MC) to object to their appointment. Objections or changes of MCs can be suitably managed retrospectively via MSATS	AEMO notes the respondent's support for the proposed change.



No.	Consulted person	Heading	Issue	AEMO response
		change of retailer	procedures and avoids the need for the objection process and the consequential delays this causes to the existing transfer process.	
14.	Red and Lumo	Nomination of multiple roles alongside a change of retailer	<p>Red and Lumo support AEMO’s proposal to enable the Metering Coordinator (MC) role to be nominated in a 1000 series CR with MCs no longer able to object to the CR. We agree that this limits the potential system impacts on retailers while also addressing the problem of delays for consumers from MC objections . However, Red and Lumo are concerned that the wording in the procedures does not appear to match AEMO’s conclusion in their draft determination.</p> <p>Specifically the draft procedures state that the Financially Responsible Market Participant (FRMP) must “ensure that the initial MC is only nominated as the New MC, on a CR10XX, where they are already Current MC.”<sup>6</sup></p> <p>The wording of the procedures appear to imply that a retailer can only nominate an MC in the 10XX series CR where that MC is already the current MC on the connection point. However, this contradicts the Draft Determination which concluded to implement an option “which would enable the MC role to be nominated in a 1000 series CR” and that “the MC would not have the ability to object to any such nomination and any incorrect nominations would need to be addressed by the retailer following completion of the customer switch.”<sup>7</sup></p> <p>Red and Lumo suggest AEMO should reword the procedures to better confirm a retailer’s ability to nominate the MC role in a CR10XX series.</p> <p><sup>6</sup> Australian Energy Market Operator, MSATS Procedures, CATS Procedure Principles and Obligations, Version 4.9, December 2020, p8.</p> <p><sup>7</sup> Australian Energy Market Operator, NEM Customer Switching, Draft Report and Determination, December 2019, p10</p>	Term Initial MC is defined in the Glossary and refers to the distributors providing type 5 and 6 services.
15.	AGL	Notification of a pending role change	<p>We also support AEMO’s determination to remove notification of a pending role change to parties, as originally proposed, to align with the ACCC’s recommendations.</p> <p>However, as we observed in our submission in response to the Issues Paper, the proposal will have a range of material implications for retailers being able to comply with their obligations under National Electricity</p>	AEMO refers to the responses in the Final Report sections 4.1 Table 6, item 4.



No.	Consulted person	Heading	Issue	AEMO response
			<p>Rules (NER) and National Energy Retail Rules (NERR) where they lose a customer in the transfer process.</p> <p>We note AEMO’s view that retailers and their service providers have a range of mechanisms to minimise customer confusion and/or any service works being undertaken inappropriately. These solutions are not fit for purpose in a new faster transfer process that AEMO is proposing. The current processes available are based on the retailer receiving prior notification on losing a customer and can therefore remove any pending service orders. With the removal of the losing retailer notification retailers will only know of a transfer out once the transfer has been completed.</p> <p>There is no opportunity for the losing retailer to take any necessary action against pending service orders. For example, we do not believe retailers’ available checks and controls are sufficient to ensure an optimal customer experience, particularly in the context of wrongful disconnections. With strict regulatory interpretation and penalties attached to wrongful disconnection, AEMO has a responsibility to not only implement a faster transfer process but to also ensure they make any other necessary procedural changes to avoid negative and unintended consequences.</p> <p>While we acknowledge AEMO’s interest in restricting notifications to parties contracted to the current retailer of a pending customer switch (so as not to circumvent the removal of retailer notification through possible forward notifications), we believe customer safety should be the overriding consideration in the context of disconnections.</p> <p>In order to mitigate this risk and ensure an optimal customer experience, we would recommend AEMO develop a process that enables notification to contracted parties (distribution network businesses) with safeguards to ensure this information is not shared with the current retailer.</p> <p>As AEMO and the AEMC advised in its Joint Advice to the COAG Energy Council<sup>2</sup> that initiated the customer transfer reforms, the HLD and associate rule changes were also to take into account customer protection issues. In our view, establishing a notification process to contracted parties (distribution network businesses) with safeguards to ensure this information is not shared with the current retailer will provide</p>	



No.	Consulted person	Heading	Issue	AEMO response
			<p>the necessary protection to customers to ensure their ongoing safety. Given that appropriate safeguards could be established to ensure this notification is not shared with 'losing' retailers, we believe such an approach would be compatible with the ACCC's Recommendation 8 to remove advanced notification to 'losing' retailers and the policy intent to limit the opportunity to 'losing' retailers to conduct save activity.</p> <p>We would welcome the opportunity to meet with AEMO to work through a solution for pending services orders that provides a positive customer outcome from a faster transfer and without any unintended interruption to their supply arrangements. These can then be implemented simultaneously and in line with AEMO's terms of reference.</p> <p><sup>2</sup> AEMO and AEMC, Advice: Implementation options for ACCC recommendation 8 and 9 – customer transfers (3 December 2018), Available at <a href="https://www.aemc.gov.au/sites/default/files/2018-12/AEMC%20and%20AEMO%20joint%20advice%20customer%20transfers.%20%20Combined%20version%20for%20publication.pdf">https://www.aemc.gov.au/sites/default/files/2018-12/AEMC%20and%20AEMO%20joint%20advice%20customer%20transfers.%20%20Combined%20version%20for%20publication.pdf</a>. AEMO also acknowledged this in its Issues Paper. See AEMO, Customer Switching in the NEM, Issues Paper (October 2019), page 6, available at <a href="https://www.aemo.com.au/-/media/files/stakeholder_consultation/consultations/nem-consultations/2019/nem-customer-switching/aemo-nem-customer-switching-issues-paper.pdf?la=en&amp;hash=71083784CAC3D4E98B7966E749A99F81">https://www.aemo.com.au/-/media/files/stakeholder_consultation/consultations/nem-consultations/2019/nem-customer-switching/aemo-nem-customer-switching-issues-paper.pdf?la=en&amp;hash=71083784CAC3D4E98B7966E749A99F81</a>.</p>	
16.	EnergyAustralia	Removal of loss notification	<p>AEMO's proposal to remove the pending loss notification from retailers and metering coordinators, will reduce 'saves' activity. However, an unintended consequence is the limiting of a retailer's or metering coordinator's capacity to cancel active service orders. If a change of retailer notification is only received on the date of the transfer, in some circumstances it will impose an unachievable timeframe for cancelling service orders that are active, i.e. disconnection or metering work service orders issued to the field may not be cancelled by the distributor or the metering coordinator.</p> <p>EnergyAustralia accepts AEMO has proposed to remove the pending loss notification to limit 'saves' activity, we suggest that AEMO consider alternatives that will achieve this outcome or additional forms of notifying a losing retailer, metering coordinator, or distributor, to cancel any pending service orders:</p> <ul style="list-style-type: none"> <li>• AEMO/AEMC to reconsider banning 'saves' activity, an action already considered by the Victorian government, and something that will</li> </ul>	<p>AEMO refers to the responses in the Final Report sections 4.1 Table 6, item 4.</p> <p>The concept of pending notifications being included notably prior to the completion of a transfer is no longer relevant for a faster next or 2 day transfer.</p>



No.	Consulted person	Heading	Issue	AEMO response
			<p>achieve the requirements initially outlined by ACCC's recommendations 8 and 9 of the Retail Electricity Pricing final report. If AEMO will not consider banning saves,</p> <ul style="list-style-type: none"> <li>• AEMO could develop an interaction in the B2B market to identify pending service orders, and then create a transaction to cancel service orders that are arranged for a period coinciding with a pending transfer, or</li> <li>• AEMO could retain the current pending loss transactions, and review 'saves' activity to ensure it is not triggered and completed prior to the transfer (as AEMO have not limited 'win-back' activity).</li> </ul>	
17.	ERM Power Retail Pty Ltd	Notification of a pending role change	<p>As per our previous submission we agree that save activity should be stopped. However, in our view an outright ban on save activity would be more effective and reduce the likelihood of save activity moving to win back activity, which has been the case in NZ. Any outright ban on win back and save activity will negate the need for these changes.</p> <p>The change to systems in the manner proposed will not allow retailers to continue to manage the correction of erroneous transfers of their customers – this will lead to an increase in complaints and customer detriment.</p>	<p>AEMO notes it is not within our remit to ban save and win back.</p> <p>Error correction CRs (102x) are still available for retailers to use.</p>
18.	MEA Powershop	Notification of a pending role change	<p>As stated in our Issues Paper submission, Powershop supports the intent of this change and is of this view that this technical change could make the switching process more efficient for customers and promote competition.</p> <p>It is important to note that valuable feedback was raised by other retailers regarding the scenario of a customer switching prior to or during any planned service works at their address. While Powershop agrees with AEMO's view that "<i>it is reasonable to consider that they (retailers) would have processes in place to prevent that work from proceeding</i>", it is important to understand that these processes only work if there is sufficient time to act.</p> <p>There will be fringe cases where work may not be able to be stopped due to remote installations, or technicians are not able to be contacted while in transit etc. This should be monitored by AEMO and stakeholders,</p>	<p>AEMO notes the respondent's support for the intent of the change and discussion on the fringe cases and refer to refers to the responses in the Final Report sections 4.1 and Table 6, item 4.</p>



No.	Consulted person	Heading	Issue	AEMO response
			and acted upon with a technical solution if there is a sufficient need to do so.	
19.	Momentum Energy	Notification of a pending role change	<p>We reiterate our previous response to this item in the Issues Paper. We realise that the main objective of removing pending role change notifications is to avoid “saves” activities but we are still concerned that disconnection service orders need to be cancelled during move in scenarios where a disconnection for debt was requested. Different MCs, MPs and MDPs may be involved, for each of their respective retailers or the distributor, and the losing retailer will have no visibility of the pending move in and will be unable to fulfil their regulatory obligation to cancel the disconnection service order. This may result in the new customer moving into a property with no power and could create a wrongful disconnection penalty breach for the retailer.</p> <p>Momentum would also prefer not to rely solely on Distributors (in Vic) to cancel planned disconnections as suggested in the DRD.</p> <p>We believe that a one day notice of transfer, to the losing retailer, would resolve this issue without allowing sufficient time for “saves” activity to occur. Moreover all “saves” activities are likely to be banned in Victoria under proposed new regulations advised to retailers on 18 December 2019 by the Victorian government (DELWP) .It is understood that the proposed transfer procedures will apply nationally but it is also clear that other jurisdictions can readily manage this activity, similar to Victoria, if necessary.</p>	AEMO refers to the responses in the Final Report section 4.1 and Table 6, item 4.
20.	Red and Lumo	Market notification of customer transfers	<p>Red and Lumo continue to believe that the lack of sufficient examination of the impacts of the proposed changes is likely to have unintended consequences on both consumers and the wider market. Specifically, AEMO has again failed to properly examine how the removal of the notification to retailers of a transfer or the implementation of a retrospective transfer will impact pending service order or metering requests in the market.</p> <p>In its draft determination, AEMO claimed that currently there are “mechanisms that can be employed by retailers and their service providers to minimise risk of confusion to customers, or of any service</p>	<p>AEMO refers to the responses in the Final Report sections 4.1 and Table 6, item 4.</p> <p>Customer protections are matters considered by the AEMC. AEMO in their rule change request asked the AEMC to consider customer protections regarding faster customer switching and we note that these matters were raised by Red/Lumo in the AEMC’s consultation.</p>



No.	Consulted person	Heading	Issue	AEMO response
			<p>works being undertaken inappropriately, without the need for a notification of a pending customer switch.”<sup>2</sup> However, the mechanisms and processes that AEMO refer to are based on the current transfer framework with its existing market notification. AEMO made no consideration of how these processes and mechanisms work when no notification received by the retailer.</p> <p>Notification periods for transfer can also play a much wider and more important role for consumers than just a “save” activity. During the Victorian Essential Services Commission's work on amendments to the Energy Retail Code to introduce protections for customers experiencing family violence, it was revealed that perpetrators of family violence can manipulate systems and transfer processes of utility accounts against victims. This can be done in a number of ways including forcing accounts into the victim’s names without contributing to the debt or transferring the account out of an affected customer’s name without their knowledge.</p> <p>In one instance, a perpetrator attempted multiple times to transfer an electricity account to another retailer with the alleged aim of disconnecting the power at the property. Without the notification periods and the existing notices on the account, the losing retailer would not be able to contact the customer or organise to notify the winning retailer that the customer did not wish to transfer the account to them. The notice period also allows customers the opportunity to have a conversation with the losing retailer to make sure that indicators such as family violence, concessions, payment plans or hardship are maintained on the account. Red and Lumo have committed to implement the family violence protections nationally, not just in Victoria, and the removal of the notification window diminishes our ability to provide adequate protections to our customers affected by family violence.</p> <p>As noted the one business day notice period has essentially eliminated the ability of companies to carry out “save” activity but it does allow for important discussions on sensitive accounts. Therefore, we consider that the removal of the notice period altogether requires further analysis to fully understand its broader impact. Red and Lumo strongly encourage AEMO to refer to our submission to the issues paper in examining the</p>	



No.	Consulted person	Heading	Issue	AEMO response
			<p>impact of the removal of this notification and continue to believe that AEMO must consider an alternative approach including retaining the market notification to address these risks. Through an assessment of the costs and benefits, AEMO will be able to assess that the change meets the national energy retail objective. In particular focusing on the long term benefits to consumers with respect to price, quality, safety, reliability and security of supply of energy. Removal of the notification window will be detrimental to the safety of consumers, as retailers will be unable to provide additional protections to potential victims of family violence.</p> <p><sup>2</sup> Australian Energy Market Operator, NEM Customer Switching, Draft Report and Determination, December 2019, p12</p>	
21.	Red and Lumo	Notification of a pending role change	<p>Red and Lumo remain concerned that AEMO has not properly assessed the full impacts of the removal of the notification. We continue to believe that the only available avenue to address the above issues is to maintain a one business day notification period to market participants of a pending transfer. This would allow retailers to cancel pending meter installations or disconnections for non payment, avoiding the negative customer impact and associated penalties.</p> <p>Please also refer to Red and Lumo’s commentary on the governance arrangements and Market notification of customer transfer in our submission to the issues paper.</p>	AEMO refers to the response in the Final Report section 4.1, Table 6, item 20 and the Draft Report Table 1, item 72.
22.	AGL	Objection to customer switches in Victoria based on a certified debt	<p>While AGL’s preferred approach is that Victoria harmonises its’ jurisdictional requirements relating to certified debt objections with the National Energy Customer Framework, we note support AEMO’s determination to progress as proposed to introduce a new CRC to enable the reversal of a customer switch in place of the current objection mechanism.</p>	AEMO notes the respondent’s support for the proposed change and the comment on Victoria.
23.	ERM Power Retail Pty Ltd	Objection to customer switches in Victoria based on a certified debt	<p>AEMO’s own statistics reinforce that these instances are immaterial, and we conclude that it is very unlikely that the costs and procedural changes required would result in a positive cost benefit.</p>	AEMO refers to the responses provided in the Draft Report Section 4.7, and Table 13, items 5 and 7.



No.	Consulted person	Heading	Issue	AEMO response
24.	MEA Powershop	Objection to customer switches in Victoria based on a certified debt	Powershop agrees with the draft decision.	AEMO notes the respondent's support for the proposed change.
25.	Momentum Energy	Objection to customer switches in Victoria based on a certified debt	<p>The proposal to introduce a new change request code (CRC) to enable the reversal of a customer switch in place of the current objection mechanism is a reasonable alternative. However, the proposal that the new CRC must be raised no more than one business day following the completion of the customer switch is unnecessarily onerous and does not allow sufficient time for a manual assessment of any aged debt.</p> <p>A manual review of the debt may actually reduce the number of aged debt reversals that a retailer activates that would otherwise be automated and we urge AEMO to increase the allowable time for this new CRC to two business days (BD).</p>	AEMO notes the timeframe assigned to raise the new reversal CR is same as the existing one day to object. The timeframe has remained unchanged.
26.	Red and Lumo	Objection to customer switches in Victoria based on a certified debt	AEMO has proposed to introduce a new change reason code to reverse a transfer for debt. As stated above, we prefer the retention of the notification window, we consider that this new change reason code is an appropriate solution in the absence of an objection ability.	AEMO notes the respondent's comment.
27.	AGL	Transfer of the financially responsible market participant (FRMP) role	<p><i>Prospective transfer</i></p> <p>AGL supports AEMO's determination to:</p> <ul style="list-style-type: none"> <li>• proceed with its preferred Option 2 to retain the CRC1000 and redesign at Read Type Code level;</li> <li>• retain special readings (SR) to facilitate a customer request to switch via an SR read type code; and</li> <li>• retire the Next Scheduled Read Date (NSRD) Read Type Code for the purpose of transfers.</li> </ul> <p>However, in order to ensure that the transfer procedures best serve the long-term interests of electricity consumers consistently, AGL would</p>	AEMO notes the respondent's support for the proposed change and refer to the response in Table 6, item 2.

No.	Consulted person	Heading	Issue	AEMO response
			<p>recommend that AEMO consider appropriate changes to its own system to ensure that all transfers occur on an actual meter read.</p> <p>A modern real-time transfer system will also be an important precursor to the implementation of the CDR framework for the energy sector. In a market supported by the CDR framework, customers will expect to be able to receive and take advantage of offers in real-time, providing a seamless customer experience for consumers. We would therefore encourage AEMO to develop the necessary system changes now to ensure a well-functioning modern market into the future.</p> <p>As we observed in our submission to the Issues Paper, in the context of manually read interval meters (MIRM) (Type 5 or Type 4A) (MRIM), transfers should only occur on an actual read provided by the MDP or the nominated transfer date or a final substituted meter read. While we appreciate that these transfers would occur on Required Read, we would recommend AEMO consider developing system controls to prevent the use of estimated read transfers within the Required Read option. We anticipate substantial complexity for customers where a transfer is undertaken on the basis of an estimated read in these circumstances. In some instances, remediation in relation to estimated read of MRIM could entail a customer receiving three revised bills from their former retailer and two bills from their new retailer, causing substantial complexity for customers to navigate and therefore potentially mitigating any consumer benefits from a faster transfer.</p> <p>We note AEMO's commentary in the Draft Determination that 'under current data management requirements in AEMO Procedures, any estimated interval metering data provided as a 'Final' reading would be replaced with actual readings if obtained in the future. As a result, marking the data as 'Final' would not 'lock' the data and make it unchangeable, and would therefore not limit the likelihood of the retailer having to rebill or issue credits as appropriate.'</p> <p>However, we would recommend that AEMO seek to revise its Procedures to enable any estimated interval metering data provided as a 'Final' to be 'locked', thereby preventing future meter readings from necessitating reconciliations. In our view, this solution would both:</p>	<p>AEMO is providing options that a retailer can choose to use to transfer customers. AEMO is providing visibility of whether sub or actual previous readings are available for retrospective transfers to enable a retailer to choose an actual/final reading. AEMO also refers to the response in Table 1, item 32.</p>

No.	Consulted person	Heading	Issue	AEMO response
			<ul style="list-style-type: none"> <li>facilitate a superior customer experience, by reducing customer confusion in received revised bills from their retailers; and</li> <li>reduce the costs to retailers associated with these reconciliations.</li> </ul>	
28.	AGL	Transfer of the financially responsible market participant (FRMP) role	<p><i>Retrospective transfers</i></p> <p>AGL supports AEMO’s determination to extend the proposed 15 business day ‘window’ in which a recently obtained metering reading could be used to support a retrospective in-situ customer to a full three calendar month period. As we observed in our submission to the Issues Paper, the retrospective ‘window’ should enable switching customers to benefit from more competitive offers retrospectively to the greatest extent possible.</p> <p>In the context of manually read metering installations, we note AEMO’s determination to retain the CRC 1010 for retrospective customer switching. While this is not an ideal outcome in terms of ensuring a consistent customer experience, we appreciate that it reduces the need for system changes and associated costs.</p> <p>We also note AEMO’s determination that the time ‘window’ extension is not required for connection points with remotely read metering installations due to the ready availability of prospective readings but that AEMO intended to:</p> <ul style="list-style-type: none"> <li>establish a retrospective facility within the CRC 1000 as previously proposed (obtained by use of an RR read type code) for a retrospective date within the last 10 business days and only applicable to remotely read metering installations; and</li> <li>retain the EI read type code as requested by several participants as an alternative to the RR code, and for remotely read metering installations (type 1-4 metering only).</li> </ul>	AEMO notes the respondent’s support for the proposed change and comments on CR1010 and remotely read metering installations.
29.	EnergyAustralia	Retrospective transfers	<p>EnergyAustralia supports the retrospective transfer option in AEMO’s draft determination. Extending the allowable timeframe for retrospective transfers will provide an additional transfer option for retailers to consider. It is reasonable to assume that it will be the preferred option for most retailers because:</p>	AEMO notes the respondent’s support for the proposed change and refer to the response in Table 1, item 32.





No.	Consulted person	Heading	Issue	AEMO response
			<ul style="list-style-type: none"> <li>• it will generally be a reading accepted by the customer i.e. a reading that is not in dispute,</li> <li>• retailers are able to depend on an actual reading via this option,</li> <li>• it will result in a reduction in the use of special reads and associated fees, and</li> <li>• it will result in less exposure to inaccurate estimations.</li> </ul> <p>Participants have expressed concerns with AEMO settlement resulting from extending the retrospective period to 65 business days. Outside of increased operating expense in reviewing settlement, EnergyAustralia has not established any evidence that this concern is justified. The retrospective transfer option will be predominantly used for basic meters, as readings will easily be obtained for type-4/advanced/interval meters. AEMO are responsible for correcting previously charged settlement, with the only consideration for a retailer being reviewing historical, current, and revised settlement. The potential exposure to risk if a retailer obtains a significant portion of customers from a retrospective read and are now in a position where their payment to AEMO is due prior to invoicing their new customers, seems unlikely although should be considered as something that could occur in a Retailer of Last Resort event. While EnergyAustralia supports the retrospective transfer option, we note some considerations for AEMO below.</p> <p>Retailers will need to determine the requirements and implications around backdating rates when a customer is won and retrospectively transferred. It is expected most transfers are moving from a more expensive offer to a new cheaper offer (and backdating the new price will be a good customer outcome). However, there could be exceptions where the new rates may be more expensive (e.g. due to a network price increase). Retailers will have to consider how to manage this issue by clear disclosure of any new rates that are more expensive. In this regard, we note that existing obligations for retailers already provide adequate consumer protection regarding price disclosure. For instance, under the National Energy Retail Rules, retailers must provide price information before or as soon as practicable after contracting a customer.</p>	

No.	Consulted person	Heading	Issue	AEMO response
			<p>We also note that the increased use of retrospective transfers will have ramifications on distribution network billing, with an increase in reconciliation activity by both distributors and retailers. Network billing disputes are already a contentious point between distributors and retailers. It is expected that additional adjustments will result in increased operating expenses and un-/identified disputes.</p>	
30.	ERM Power Retail Pty Ltd	Transfer of the FRMP role	<p>It is our view that AEMO needs to sufficiently investigate and address the risks stemming from estimated final bills. We have highlighted our concerns with respect to settlement implications and operational and financial implications of having to readjust customer bills post transfer. We maintain our view that the solution must ensure that the read sent by the MDP to a retailer for billing is that used by the wholesale/network billing process, to ensure alignment between retailer costs and customer invoices. This issue remains and has not been addressed by AEMO.</p> <p>We believe there is way to reduce this risk of customers transferring on inaccurate estimates, benefitting all customer types. The risks of manually read estimated transfers are compounded for switches of large business customers that are made up of various small sites (multi-sites). Our proposed solution would particularly be beneficial to this customer group. We suggest that procedures should be amended to only allow switching on an estimate if the last bill read provided to the market was an actual reading. If this is not the case, the customer would be able to quickly switch through a special read. This will limit the occurrence of inaccurate estimates provided as transfer reads. We believe that this could be facilitated with the proposed technical solution under 4.5.1 of having the last read date known and the quality of that read available. If a prospective retailer was to raise an estimated base transfer and the previous read quality was 'estimate', we believe this should automatically produce an error. In response, the prospective retailer would raise a special read in consultation with the customer to affect the transfer. This will greatly reduce the risk of grossly inaccurate estimates, that is, reducing the financial risk of retailers and the additional cost/inconvenience to customers finalising their account.</p>	<p>AEMO has considered this issue in the HLD, issues paper and draft report. AEMO has restricted retrospective transfers to actual/final meter readings and refer to the response in Table 1, item 32.</p> <p>Large multi-site customers deploy advanced metering to manage the risk and for a large customer, with geographically dispersed sites, will be highly unlikely to have the same read dates (for use in a transfer). AEMO also note feedback from consumer representatives that large customers do not tend to end a contract prior to the stated end date as there are termination clauses to be dealt with.</p>

No.	Consulted person	Heading	Issue	AEMO response
			<p>We suggest that this recommended solution would only be applicable to customers with basic meters. This could be achieved via the introduction of the meter type as a parameter into table “4-N – Valid Combinations of Read Type Codes, Metering Installation Type Codes and Change Reason Codes” in the CATS procedures i.e. Read Type Options for Metering Data Types Manually Read Basic, Manually Read Interval &amp; Remotely Read.</p> <p>Customers with MRIMs should not be able to transfer via the estimated read process at all as this will always result in a revised final bill – which is not a good customer outcome. In our view such customers should transfer via a special read. We believe that the benefit of this solution outweighs any small potential transfer delay to the customer whilst the special read completes and that the volume of customers impacted would be low (low volumes of MRIMs). We would expect the continuing smart meter roll out to further reduce the number of impacted customers.</p> <p>We note that AEMO has considered extending the retrospectivity beyond the initial 15 days to 3 months, suggesting that this will reduce retailers’ reliance on the use of estimated readings. However, this does not consider the wholesale contract risk of transferring large multi-site customers comprising of many sites. AEMO needs to consider this retailer risk which is unmanageable when numerous small sites are involved in the loss of a large multi-site customer retrospectively, immediately altering the incumbent retailer’s hedging position. The suggestion that this risk can be managed by retailers “retention, marketing and service offerings” does not address this issue.</p>	
31.	ERM Power Retail Pty Ltd	Retaining EI read type	We agree with this position as a sensible amendment, allowing the continued use of the EI read type and negating what would have been a cost for retailers in system changes.	AEMO notes the respondent’s support for the proposed change.
32.	MEA Powershop	Transfer of the FRMP role	<p><u>Remote meters</u></p> <p>As stated in our response to the Issues Paper, Powershop’s view is that the intent of the change was to speed up the switch for customers who do not have a remote read capable meter. Having a 10 business day retrospective switch window for remotely read meters adds unnecessary</p>	The RRIM 10 day retrospective window is there for retailers who wish to wait for end of the cooling off period to enable the transfer – AEMO considers is a reasonable mechanism for facilitating a transfer.

No.	Consulted person	Heading	Issue	AEMO response
			complexity. Powershop support a next business day switch (allowing for the midnight cutover) as this meets the intent of the rule without overly complicating the change.	
33.	MEA Powershop	Transfer of the FRMP role	<p><u>Manual meters</u></p> <p>Powershop agrees with the draft decision to be able to retrospectively switch a manually read meter customer. However, as a monthly billing retailer, Powershop is concerned about the potential sub-optimal customer experience due to billing reversals. The unintended customer consequence of this change must be considered by Ombudsman schemes when dealing with billing complaints associated with a retrospective switch.</p> <p>Despite the concerns for customers of monthly billing retailers with the proposed 90 day timeframe in the draft decision, Powershop prefers the retrospective switch approach over the estimated read approach. Powershop advised in its response to the Issue Paper<sup>1</sup> that customers have a dislike of estimate reads, despite customer acceptance of them in other energy markets overseas and AEMO's position that there was enough evidence to use an estimate read to switch.</p> <p><sup>1</sup> Powershop submission to the 'Customer Switching in the NEM Issues Paper' 29 November 2019, page 1 "Energy and Water Ombudsman of NSW (EWON) 2018-19 Annual Report confirmed that EWON received only 375 complaints regarding a delayed transfer<sup>1</sup>, compared with over 2,000 relating to estimate reads"</p>	AEMO notes the respondent's comment.
34.	Momentum Energy	Transfer of the FRMP role	<p>While we suggested a retrospective transfer timeframe limit of 40 BDs in order to maximise the use of previous actual reads for transfers we also see merit with extending this period to the proposed three months (65 BD). This almost ensures that at least one previous actual read is available for meters read quarterly. Extending the time period does present retailers with challenges as to price validity and lost revenue but these issues are manageable. The progressive roll out of remotely read meters will also increasingly reduce the use of retrospective reads for transfers.</p> <p>Momentum reiterates our concerns with the proposal to allow estimated reads as they impose an uncontrollable risk on the losing retailer caused by the winning retailers' decision to use estimated reads. It is also likely that actual reads will replace these estimated transfer reads causing both</p>	<p>AEMO notes the respondent's support for the proposed change.</p> <p>AEMO continue to stand by position in HLD on substituted reads.</p>

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			retailers to adjust their billing. Many customers will be confused by this outcome and they may lose confidence in the process and potentially disengage from the market.	
35.	PIAC	Transfer of the FRMP role	The draft determination extends the timeframe for retrospective transfers to 3 months. We agree this may improve customer outcomes by providing a smoother transfer process and reducing reliance on estimated reads, however, similarly, we recommend AEMO monitor the impacts on retailers, particularly administrative costs, losing retailer market exposure and customer credit/payment plans.	AEMO supports the statements made by the AEMC in their final determination on the rule change associated with this consultation regarding monitoring and implementation (section 15 and 16 of the final determination summary for Reducing Customers' Switching Times – Rule 2019)
36.	Red and Lumo	Retrospective transfer of FRMP role	<p>Red and Lumo continue to support retrospective transfers that consumers, where it provides benefits to consumers to do so. We strongly support limiting retrospective transfers to 15 business days, not 90 days as proposed in the draft determination. The move to 90 days creates consequential issues for retailers, in terms of regulatory reporting and network billing.</p> <p>Red and Lumo share AEMO's original view "that the period of 15 business days provides customers with a degree of flexibility without establishing a material risk of needing to be credited for payments made on a structured, predictable monthly payment plan."<sup>1</sup> The proposed 15 business day timeframe is a good balance between the interests of participants and consumers when considering the wholesale market impact as well as network settlements. This view was supported by all stakeholders, with the exception of Energy Consumers Australia. It is unclear why AEMO took the view of one stakeholder and not the majority. Further, the draft determination provides limited information of its consideration of this change and any consequential implications it may have.</p> <p>We firmly oppose the introduction of 90 day retrospectivity as it will impact wholesale settlement, network settlements and regulatory reporting. Furthermore, AEMO has not considered the consumer experience of introducing this change. Particularly where customers are on payment plans and bill smoothing arrangements. We strongly support consumers being able to change retailers quickly, and even</p>	<p>AEMO refers to the response provided in Table 6, item 4 on monthly billing and section 4.4 of the Draft Report.</p> <p>AEMO has referred to the Australian Energy Regulator ("AER") the question as to compliance with the AER (Retail Law) Performance Reporting Procedures and Guidelines, April 2018, Version 3 ("Procedures and Guidelines").</p> <p>The AER will consider the issue in the context of any future review which the AER undertakes of the Procedures and Guidelines.</p> <p>AEMO's assessment is that retailers must provide reports based on their records at a point in time, being "by the date or dates", as relevant. If a retailer's records change in a way that subsequently alters the information and data, then the retailer has not failed to comply with the requirements.</p>



No.	Consulted person	Heading	Issue	AEMO response
			<p>retrospectively, however limiting the timeframe for to 15 business days will reduce any impact on the customer.</p> <p>AEMO has not properly examined the impact that the proposed retrospective transfer timeframe on the wholesale market. The introduction of a 90 day retrospective transfer is likely to increase costs throughout the market, as it will create further unpredictability and volatility. In particular, as this is being implemented at a time of unprecedented amount of change, as industry participants are facing more unknown costs through the introduction of 5 minute settlement and global settlement.</p> <p>Networks issue retailers invoices 30 days after the end of the month meaning they would be confident in the customer numbers and network charges for the previous month. This information will be perpetually incorrect, should AEMO implement 90 day retrospectivity. A prudent retailer may choose to auto-object to any network invoices until three months post the date of issue when they will be able to confirm the charges against historical customer numbers. This will create a massive disparity in network billing, heavily impacting their revenue and likely increasing costs which will eventually be passed onto consumers.</p> <p>Section 282 of the National Energy Retail Law requires retailers to submit reports to the Australian Energy Regulator (AER) on a quarterly basis under the AER Performance Reporting Procedures and Guidelines. Even if a retailer decides not to offer 90 day retrospectivity to its prospective customers, its reporting data that is required to be submitted to the AER will be perpetually incorrect. This will not only apply to how many customers the retailer has at the end of the quarter, but also how many hardship customers, concession customers, payment plan were established in a month and many other data points. Moreover, this is a civil penalty that the AER clearly views as an important element of its monitoring and enforcement strategy, given its proceedings against a retailer in the Federal Court for alleged reporting breaches.</p> <p>Furthermore, allowing 90 day retrospectivity will also undermine the integrity of AEMOs reports and the data it provides to the market.</p>	



No.	Consulted person	Heading	Issue	AEMO response
			<p>As the current Procedures allows for both a retrospective transfer and an error correction (with a longer timeframe) we consider that retaining these two change request types is both beneficial and essential. We consider that long term retrospective transfers should only be used when a customer has been won in error and remain only a small percentage of customer transfers. Maintaining the separate change request types will make them easy to identify and manage in terms of all the matters outlined above.</p> <p>Red and Lumo strongly oppose the proposal to extend this transfer timeframe to 90 days as there has been no proper examination on the impact of the proposal. We strongly encourage AEMO to move back to its original proposal of 15 business days for the vast majority of stakeholders were willing to support. It meets all of the proposed aims of the rule change (and the ACCC's initial recommendation), while causing the least disruption to industry.</p> <p><sup>1</sup> Australian Energy Market Operator, Customer Switching in the NEM: Issues Paper, October 2019, p19</p>	
37.	AGL	Technical solution for the provision of previous read dates and quality	<p>AGL supports AEMO's view that previous read dates and reading quality should be provided via NMI discovery as proposed in the Issues Paper. We also support AEMO's intention to align the proposed schema changes with the five-minute settlement program of work. In addition to the introduction of two new fields (Last Read Date and Read Quality), we would also recommend the schema changes contemplate the introduction of a third new field (Last Actual Read) to support retailers' transfer processes. This would provide greater flexibility and choice in how to effect a retrospective transfer based upon the customer's own preference.</p>	<p>AEMO notes the respondent's support for the proposed change.</p> <p>AEMO notes that the technical solution will provide more flexibility than the suggested additional field. It encompasses the last actual along with other reads, if there is a last actual in the 12 month period.</p>
38.	ERM Power Retail Pty Ltd	Technical solution for the provision of previous read dates and quality	<p>We agree with the proposal to affect our recommendation under 4.4 (Transfer of the FRMP role) above.</p> <p>See Transfer of the FRMP role discussion.</p>	<p>AEMO notes the respondent's support for the proposed change and refer to response to Table 6, Item 30.</p>



No.	Consulted person	Heading	Issue	AEMO response
39.	MEA Powershop	Technical solution for the provision of previous read dates and quality	Powershop agrees with the draft decision to provide previous read dates and quality flags via NMI discovery rather than via a secondary mechanism.	AEMO notes the respondent's support for the proposed change.
40.	Momentum Energy	Technical solution for the provision of previous read dates and quality	In order to maximise the benefits of utilising retrospective meter reads for transfers reads the value and quality of these reads needs to be readily visible to prospective retailers. We confirm our support for an effective solution to this issue which includes the proposal to make this data visible via NMI discovery. While this will require a schema change it will also deliver the most efficient long term solution.	AEMO notes the respondent's support for the proposed change.
41.	Red and Lumo	Provision of previous read dates and quality	Red and Lumo support AEMO's proposed technical solution that would see previous reading dates and reading quality "provided via NMI discovery as proposed in the Issues Paper" with the data used to populate the fields "sourced from AEMO systems, rather than requiring additional data to be provided from MDPs." We also support the Next Scheduled Read (NSR) date being retained in the NMI discovery field as this information is used for a range of systems and automated processes for retailers.	AEMO notes the respondent's support for the proposed change.
42.	AGL	Amendments and removal of CRCs	AGL accepts AEMO's determinations to retire CRCs 1021, 1022, 1024, 1027 and 1028 and remove CRC codes for embedded networks. While we note that these changes will entail operational system costs to retailers that may not entail a corresponding benefit to customers, we acknowledge that these changes reduce duplication in MSATS.	AEMO notes the respondent's comment.
43.	MEA Powershop	Amendments and removal of CRCs	Powershop agrees with AEMO's amendments and removals of CRC's in the draft decision.	AEMO notes the respondent's support for the proposed change.
44.	Momentum Energy	Amendments and removal of CRCs	All of the proposed changes to CRCs are supported including the following: <ul style="list-style-type: none"> <li>Retention of CRC 1040 retrospective period at 10 BD so that it aligns with the retrospective period to be established in the CRC 1000;</li> </ul>	AEMO notes the respondent's support for the proposed change.



No.	Consulted person	Heading	Issue	AEMO response
			<ul style="list-style-type: none"> <li>• Removal of the embedded network CRCs; and</li> <li>• Removal of CRCs 1021, 1022, 1024, 1027 and 1028 as they are redundant due to the future switching changes or used infrequently.</li> </ul>	
45.	Red and Lumo	Amendments and removal of change reason codes	<p>While Red and Lumo generally support the move by AEMO to remove change reason codes that are “either already not used and redundant, or identified as being made redundant as a result of the broader procedure changes and design for the future management of customer switches”<sup>3</sup> we have some concerns around the removal of the CR1024 (retrospective move in) and the CR1021 (retrospective error correction) as proposed.</p> <p>Removing all of the change reason codes which have been listed by AEMO reflects the assumption that there will be no need for an error correction change request under the new transfer framework. As noted above, we remain concerned that this is not the case.</p> <p>The CR1021 is an error correction change request where “the proposed transfer date has been missed due to the MDP not being able to provide a corresponding Actual Change Date on the original Change Request.”<sup>4</sup> Even with the proposed changes, there is still an opportunity that this error will occur and it is not adequately addressed by other change request reason codes. Red and Lumo recommend that CR1021 is retained, and if the CR is not used in the 12 months after the changes are implemented then it can be phased out as part of a future schema upgrade. This will avoid any unintended consequences and ensure a risk-averse approach to implementation.</p> <p>There is a market benefit associated with CR1024 and it too should be re-examined post introduction of the new change request framework. A CR1024 is generally used in instances where a transfer was missed for whatever reason; the most common being “Re-energisation of Site, with or without End User notification.”<sup>5</sup> As the proposed changes from AEMO will have no impact on the existing move in or move out change requests (CR1030 and CR1040), the removal of this CR limits the ability of participants to win a move in site retrospectively if the original CR does not successfully complete for any reason. While it may be argued that 90</p>	AEMO notes that error corrections are still available and suggest the use of CR1029.

No.	Consulted person	Heading	Issue	AEMO response
			<p>day retrospectivity for all in-situ transfers would address this, as noted above, this creates a wide range of unintended consequences.</p> <p>Consistent with our recommendation on retrospective transfers and the unintended consequences with utilising the CR1010 in all retrospective transfer circumstances. We do not support the removal of the CR1021, CR1024 and the change to CR1010 to 90 days.</p> <p><sup>3</sup> Australian Energy Market Operator, NEM Customer Switching, Draft Report and Determination, December 2019, p23</p> <p><sup>4</sup> Australian Energy Market Operator, MSATS Procedures, CATS Procedure Principles and Obligations, Version 4.5, December 2017, p48</p> <p><sup>5</sup> Ibid, p48</p>	
46.	AGL	Facilitating cooling-off reversal of a FRMP change	<p>AGL supports AEMO’s determination to remove the current restrictions to cooling-off in MSATS as proposed in order that retailers can determine the best balance between providing timely switching for customers and the risks of raising reversal CRCs in the event that a customer exercises their right to cool-off. We note that AEMO intended to implement this change through the creation of a new CRC 1060, separating ‘reversal’ CRCs from error correction CRCs in MSATS.</p> <p>However, we have identified some discrepancy between AEMO’s determination to remove the current restrictions to cooling-off in MSATS (which would allow retailers discretion as to when the transfer is to be effected and its relationship with contractual cooling-off provisions required by the ACCC) and the intended reporting requirements for retailers. AEMO’s intended reporting requirements provide that:</p> <ul style="list-style-type: none"> <li>• For prospective switches, the retailer must raise the CRC in MSATS no later than one business day of obtaining informed consent from the customer (irrespective of cooling-off).</li> <li>• For retrospective switches, the retailer must raise the CRC in MSATS no later than one business day following the end of the relevant cooling-off period.</li> </ul> <p>We would recommend that the reporting requirement for prospective switches be clarified to align with the removal of the current restrictions to cooling-off in MSATS to enable retailers the flexibility to respect</p>	<p>AEMO notes the respondent’s support for the proposed change.</p> <p>Regarding the requirement for the raising of CRCs in MSATS in relation to the day of obtaining informed consent from the customer, AEMO considers that maximum flexibility is provided in the requirements presented by AEMO.</p> <p>Retailers can determine to either:</p> <ul style="list-style-type: none"> <li>• Raise the CRC within the cooling off period (a prospective transfer), that must be raised within 1 business day of customer consent; or</li> <li>• Raise the CRC post the cooling off period (a retrospective transfer) raised within 1 business day of the cooling off period completing and applied retrospectively to a date prior, which may be the date cooling-off ends, the date of obtaining informed consent, or where the procedures allow, a date prior to the date of obtaining informed consent.</li> </ul>

No.	Consulted person	Heading	Issue	AEMO response
			cooling-off timeframes. In our view, this would create a solution that better aligns with positive customer outcomes.	
47.	MEA Powershop	Facilitating cooling-off reversal of a FRMP change	Implementing the new CRC 1060 and separating the 'reversal' CRCs from error correction CRCs in MSATS makes sense in the context of this rule change, and Powershop agree with this draft decision.	AEMO notes the respondent's support for the proposed change.
48.	Momentum Energy	Facilitating cooling-off reversal of a FRMP change	<p>Momentum supports the approaches proposed by AEMO that better facilitate customers' rights to cool-off by:</p> <ul style="list-style-type: none"> <li>• Removing the current restriction from MSATS that will provide retailers with the option to complete the customer transfer within or following the completion of the cooling-off period;</li> <li>• Providing a CRC that reverses a completed 1000 series change request (CR) which may be: <ul style="list-style-type: none"> <li>○ Raised by the retailer which raised the original and completed CR; and <ul style="list-style-type: none"> <li>□ which can only reverse a series CRC 1000 that has completed in the previous 10 BD; and</li> <li>□ Requires no approval or action by any other market participant including the retailer that is regaining its customer.</li> </ul> </li> </ul> </li> </ul> <p>The current process is problematic and requires contact to both retailers and an agreement from the former retailer to submit a transfer to win back the customer.</p>	AEMO notes the respondent's support for the proposed change.
49.	PIAC	Facilitating cooling-off reversal of a FRMP change	The draft determination allows for transfers within the cooling-off period by establishing a new automatic 'reversal' code that is separate from the error correction code. We noted in our submission to the Issues Paper that allowing switches during the cooling off period warranted further consideration but could place an administrative burden on retailers that would be passed through to consumers. We support the proposed changes, but consider AEMO should monitor the administrative impact of the procedures to learn of any unintended outcomes that may erode the consumer benefit.	AEMO notes the respondent's comment and will monitor the outcomes of the changes proposed.



No.	Consulted person	Heading	Issue	AEMO response
50.	Red and Lumo	Facilitating cooling-off reversal of a FRMP change	Red and Lumo support the introduction of a new change reason codes CR1060 to allow consumers to transfer during the cooling off period. This provides a mechanism for retailers to meet their existing regulatory requirements to send a customer back should they decide to cancel during the cooling off period. We also agree that having this new CR rather than amending existing CRs would be the cleanest and most efficient option.	AEMO notes the respondent's support for the proposed change.
51.	AGL	MC appointment objections (6000 series CRs)	AGL supports AEMO's determination to change the DECLINED objection code in the MSATS procedure as proposed. We would also recommend that AEMO clarify that this change would apply equally to prospective and retrospective transfer.	AEMO notes the respondent's support for the proposed change. AEMO confirms that the change applies to both prospective and retrospective MC appointments via the 6000 series CRs.
52.	Momentum Energy	MC appointment objections (6000 series CRs)	Momentum supports the proposed changes to the "Declined" objection code for the 6000 series CRs. This will allow the proposed MC to object to being appointed to a connection point if they do not wish to perform this role.	AEMO notes the respondent's support for the proposed change.
53.	Origin Energy	Incorrect Appointment of MC	<p>As highlighted in previous submissions, Origin does not support removing the ability of MC's to object to a nomination where there is no agreement in place with the incoming FRMP.</p> <p>This is given:</p> <ul style="list-style-type: none"> <li>• There needs to be a contractual arrangement in place between between MC's and incoming FRMP's to perform services (Rule 7.2 NER). Absence of an agreement increases the risk of the MC being non-compliant and equally increases the risk of HSE related incidents;</li> <li>• Increased risk that an MC is appointed for a premises for which there is life support and the MC is not aware of the life support status. This argument assumes the incorrectly appointed MC does not have a contractual or operational relationship with the incoming FRMP; and</li> <li>• There are liability and indemnity risks if the MC appointment is not corrected in a timely manner – specifically if there is a fault to the meter and there has been loss to the customer. It is unclear who</li> </ul>	<p>AEMO notes that the only legitimate objection that may be raised by an MC under the current MSATS Procedures requirements is a scenario where:</p> <ul style="list-style-type: none"> <li>• The NMI is Large</li> <li>• The MC has been directly appointed by the Large Customer in accordance with the NER; and</li> <li>• The prospective FRMP has nominated a different MC to the one appointed by the Large Customer.</li> </ul> <p>Accordingly, AEMO is not removing the facility as proposed by Origin Energy. Any MC objecting to customer switches in the manner proposed would be doing so in breach of the MSATS Procedures.</p>

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			<p>would be responsible for the loss as the MC has no relationship with the incoming customer/FRMP. There is no enforceable contract to assign liability.</p> <p>These risks could be avoided by ensuring the MC role is correctly assigned prior to the transfer.</p> <p>If the MC cannot be correctly assigned prior to the transfer, we support capabilities remaining for an incoming FRMP to nominate the MC role prior to transfer in CR1000 requests. This will provide an opportunity for a FRMP to appoint an MC for which it has a relationship and assist in minimising the operational risks of an incorrectly appointed MC. Removing the ability for a nomination of an MC as part of the transfer process is not supported.</p> <p>To further support the above changes, we believe timeframes need to be placed on the correction of the MC role if the incoming FRMP has not corrected the MC role prior to transfer. That is, on notification from an MC of an incorrect appointment, the incoming retailer has 2 business days to correct the MC role in MSATS. This could be enacted through a rule change. Without timeframes placed on corrections, the incorrect appointment of MC could be indefinitely applied at the site. Thus raising questions over liability and who has responsibility for the metering services. This will also impact the customer.</p>	<p>AEMO notes that the requirements for appointing MCs in the NER (7.2) are facilitated by MSATS, not dictated by MSATS Procedures. To the extent that a nomination in MSATS is not reflective of the appointment made in accordance with the NER, then the retailer can adjust the nomination accordingly, including to a retrospective date if necessary. AEMO notes that the AER has recently taken enforcement action against retailers who have failed to appoint MCs in accordance with the NER; accordingly, AEMO considers that retailers are sufficiently incentivised to correctly reflect MC appointment with accurate nomination in MSATS without the need for amendment to the MSATS Procedures.</p>
54.	EnergyAustralia	Reporting	<p>EnergyAustralia supports greater reporting on how retailers are complying with MSATS procedures. However, there are instances in which a customer will contact a retailer and the retailer is unable to raise a prospective transfer in line with the +1 business day timeframe, such as if a customer’s NMI or address are not confirmed. In these instances, a retailer would elect to wait for confirmation, to ensure the transfer is of the correct address and to provide a positive customer experience. EnergyAustralia suggests that AEMO consider and outline potential exceptions to the +1 business day rule. For example, that the timeframe does not commence until explicit informed consent to enter a market retail contract has been provided or a standard retail contract is in place, and that relevant and required customer information is established.</p>	<p>AEMO appreciates the suggestion in relation to explicit informed consent (“EIC”).</p> <p>AEMO does not consider that the requirements regarding EIC operate to enable AEMO to outline potential exceptions to the +1 business day rule.</p> <p>The relevant rights and obligations are as follows:</p> <ul style="list-style-type: none"> <li>• The retailer must obtain the EIC of the customer to enter into the relevant retail contract.</li> <li>• The customer has the right to withdraw from this contract within 10 business days of receiving the “required information” about this contract.</li> </ul>



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				<p>Specifically, a retailer must obtain the EIC of a customer to:</p> <ul style="list-style-type: none"> <li>transfer the customer to the retailer from another retailer (NERL, section 38(a)); and</li> <li>enter into the relevant customer retail contract, before the retailer requests the transfer (NERR, rule 57(1)(a)).</li> </ul> <p>The customer gives EIC where:</p> <ul style="list-style-type: none"> <li>the retailer has clearly, fully and adequately disclosed all matters relevant to the consent of the customer (NERL, section 39(1)(a)); and</li> <li>the customer gives consent to the transaction in writing, verbally or by electronic communication (NERL, section 39(2)).</li> </ul> <p>The customer has the right to withdraw from the contract within 10 business days commencing with the date the customer receives the “required information” about the contract (NERR, rule 47(1),(2)). This is s information (NERR, rule 64(1)) in relation to:</p> <ul style="list-style-type: none"> <li>prices, charges and benefits to the customer, early termination payments and penalties, security deposits, service levels, concessions or rebates, billing and payment arrangements, etc;</li> <li>contract commencement, duration, extension and termination;</li> <li>operation and implications of electronic transactions;</li> <li>customer’s rights in relation to withdrawing from the contract during the</li> <li>cooling off period; and</li> <li>customer’s rights in relation to complaints.</li> </ul>



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				This “required information”, when given in a written disclosure statement, must be accompanied by a copy of the market retail contract (NERR, rule 64(2)).
55.	Energy Queensland Pty Limited on behalf of its participant entities	Marked Changes	Energy Queensland notes that the way in which marked changes were handled in the Stage 2 consultation made it difficult to review the changes between Stage 1 and Stage 2 consultations. We suggest more clarity is required for the FINAL determination.	AEMO agrees and is publishing a suite of procedures that show changes between draft and final.
56.	Energy Queensland Pty Limited on behalf of its participant entities	Version updates post Customer Switching	Energy Queensland queries how version updates will be managed to this document after it becomes effective in the market? For example, Table 4-L Metering Installation Type Code has additional changes to the Manually Read Flag column in the 5MGS changes which have been removed as part of this consultation.	The AEMO 5MS Project is aware that the procedures need to be retrofitted and will undertake this task post consultation.
57.	Red and Lumo	Estimate reads as a transfer type	Red and Lumo continue to oppose the use of estimated reads as a transfer option for consumers between retailers. As per our submission to the Issues Paper we continue to believe that there has been insufficient justification on why these changes are needed or assessment of the incremental benefit for consumers (if estimated reads are occurring already as claimed by AEMO) or how the widespread use of this transfer type would impact the wholesale settlements or the wider electricity market.	AEMO refers to the responses to the Draft Report and Determination.