

# NEM CUSTOMER SWITCHING

## PROCEDURE CONSULTATION

### DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

*Participant: Origin Energy*

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## 1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the 'NEM Customer Switching' Draft Procedures.

The changes being proposed seek to enable the implementation of efficient delivery of proposed changes to the customer switching process design in the National Electricity Market (NEM).

## 2. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
	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> </ul>

		<ul style="list-style-type: none"> <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 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.</li> </ul> <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>
Table 4-M	Read Type Codes	<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</p>

		<p>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><b>Suggested changes to wording in Table 4-M – Read Type Codes - NS</b></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.          An acceptable date is a window that is up to 3 <i>business days</i> before or 2 <i>business days</i> after the published NSRD.          If the date proposed by the New FRMP is not within this same window (i.e. up to 3 <i>business days</i> before or 2 <i>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.          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><i>Applies to types 4A, 5 and type 6 metering installations.</i></p>
<p>Table 4-N</p>	<p>Valid Combinations of Read Type Codes, Metering Installation Type Codes and Change Reason Codes</p>	<p>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.</p>
<p>Table 6-A</p>	<p>Timeframe Rules</p>	<p>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).</p>

### 3. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMI

Section	Description	Participant Comments

### 4. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments
Appendix E	Additional Reason Code 67	Origin Energy support the addition of reason code 67 "transfer".

### 5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
5. Glossary	Manually Read	There is no definition of "Manually Read" rather it has been populated with "Metering Data Type - A value that describes how metering data is obtained i.e. Manually Read or Remotely Read". This is a duplication as "Metering Data Type" has already been included.