

CUSTOMER SWITCHING IN THE NEM

FIRST STAGE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: IntelliHUB Group

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1. Context

This template is to assist stakeholders in giving feedback to the questions raised in the issues paper about the proposed changes to the customer switching process design in the NEM.

2. Questions raised in the NEM Customer Switching Issues Paper

Question No.	Question	Participant Comments
1	Does the proposed change, to limit 1000 series CRs to a change of FRMP only, unreasonably restrict a retailer or other party from performing an action as required by the NER? Are there any additional considerations that AEMO has not presented?	IntelliHUB does not believe so, what it does mean though is that a retailer must now raise a separate CR 6300 nominating the MC for 'small' NMIs.
2	Are the issues raised by AEMO regarding restrictions being placed on an MCs ability to object to an appointment reasonable?	Contestable MC's need to be able to object to erroneous MC nominations. For initial MC nominations I am not sure any changes are required here. I think initial MC's are declining correctly in most circumstances. It is some FRMP's that are nominating the initial MC in error when there is already a contestable MCs metering at site.
3	Does the removal of the notification of a pending customer switch unreasonably restrict retailers from being able to comply with the NER or NERR?	No comment.

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4	Are there any alternative design options that AEMO should consider facilitating prevention of a customer switch by a retailer based on a certified debt, which are consistent with the ACCC REPI recommendations for the removal of the notification of a pending customer switch and do not unreasonably delay customer switches in Victoria?	No comment.
5	Does the one business day timeframe proposed to enable the raising of the new Victorian certified debt objection CRC reasonably enable retailers to exercise the ability to prevent the customer switch?	No comment.
6	Should AEMO seek to replace rather than redesign the current CRC with two new prospective CRs? If so, how might transactions 'in-flight' be treated upon implementation of the procedure changes and associated system changes?	No comment.
7	Is there a compelling reason to retain the use of the NSRD in the customer switching process? If so, what are these reasons; and what controls might reasonably be introduced such that its use no longer becomes commonplace and that customers benefit from the ability to access next-day switching?	No comment.
8	Is there value in retaining an ability for a prospective change of FRMP role to occur based on a special reading?	No comment.
9	With the NSRD no longer able to be used to facilitate prospective customer switches, is there value in maintaining access to the NSRD in NMI Discovery?	Not really.

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10	How critical is the Read Quality information to the potential use of the Last Read Date for retrospective customer switching?	No comment.
11	Are there other matters that AEMO should consider regarding the three options presented, or any alternative options that AEMO might consider?	Option 2 is preference.
12	Has AEMO reasonably presented the relevant considerations in relation to using recent readings to support customer switching? Are there any additional considerations that AEMO has not presented?	No comment.
13	Is the proposed 15 business day 'window' in which a recently-obtained metering reading could be used to support a retrospective in-situ customer switch reasonable? Are there additional matters that AEMO might consider in support of a lengthening or shortening of this 'window'?	No comment.
14	Is the proposed inclusion of a retrospective customer switch in the CRC 1000 a preferable outcome to the creation of a new specific CRC for this purpose (linked to questions in section 3.1.2)?	No comment.
15	Is the proposed extension of five business days (from 10 to 15 business days) to the retrospective period within which a CR 1040 may be raised reasonable? Are there additional matters that AEMO might consider in support of maintaining the current 'window', or the lengthening or shortening of this 'window'?	No comment.
16	Should the use of a recent reading be limited to customers who have manually read metering installations? Smart metering	No. Smart Metering installation should be included but this seems to have been catered for with the

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	systems should be able to provide readings for a specified date within the last 15 business days (e.g. if a customer with a smart meter can confirm the date of their recent bill is within the last 15 business days, why should the prospective retailer be restricted from retrospectively switching the customer on that date, so that the customer and participants can access the benefits of a retrospective customer switch as described in this section?	extension to 15 business days retrospectivity for the 1040 thus aligning it to the 1000
17	Has AEMO overlooked any requirement or reasonable justification for the retention of the five embedded network-specific CRs?	No. These are not required
18	Do the changes adequately provide for retailers to comply with the cooling-off provisions and customers' exercising their right to cool-off?	No comment.
19	Is the redesign of an existing cooled-off error correction CR preferable to the creation of a new error correction CR for the purpose stated above?	No comment.
20	What problems, if any, might be caused by the removal of the error correction CRCs 1022, 1027 and 1028?	No comment.
21	Should changes be considered to error correction CRCs 1020, 1021, 1023 and 1029 to better facilitate resolution of issues and errors for customer switching?	No comment.
22	Are the changes proposed to the objection codes available to MCs regarding MC role appointment reasonable?	Not really. Contestable MC's need to be able to object to erroneous MC nominations and we have a system which allows us to do this as we have based

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		<p>our objection logic on the CATS rules. Changes to this CATS rules logic will mean changes to our system logic.</p> <p>For initial MC nominations IntelliHUB are not sure any changes are required here. It seems initial MC's are declining correctly in most circumstances.</p>
23	<p>Are there other unreasonable restrictions placed on appointing parties by the MSATS procedures that limit or prevent MSATS role appointment to align with the NER requirements at a connection point that AEMO might consider?</p>	<p>Allow MC's to raise role corrections for Small sites or 6301's. Currently MC's can only raise 63XX's for Large classified sites in MSATS as per the CATS rules.</p>
24	<p>Are there issues affecting the installation of metering that could reasonably be resolved by reducing the nominated MC's objection timeframe to zero days in MSATS?</p>	<p>No. MCs need to be able to object/decline for incorrect role nomination. A one day objection period is required for erroneous MC nominations and for large sites that have DMA's. The MC's wears all the risk and a one day objection period is not unreasonable. MC's may not have contractual arrangements in place with all FRMP's and a 1 day objection window allows for management of these scenarios.</p>

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25	Would MCs reasonably be capable of determining whether to object to transfers if the objection period for MC nomination was reduced to zero days?	No. Some of these need to be investigated especially where there is a Direct Metering Agreement present. Monitoring of and investigations may need to take place regarding MC nominations and as previously stated MC's wear all the risk and a one day objection period is not unreasonable.
26	Are there further suggestions on changes to structure to improve the clarity and accessibility of sections 1 to 6 of the MSATS CATS procedures?	No Comment
27	Do MSATS Participants believe that the proposed changes materially alter the obligations placed on them within the MSATS procedures?	No as long as we as an MC still have an opportunity to object.
28	Is the change to the reason code in the MDFF necessary?	No Comment
29	Should other changes be considered to the MDFF to accommodate the changes proposed in this Issues Paper?	No Comment
30	Is the rationale described in this Issues Paper regarding the proposed timing for implementation reasonable?	Yes
31	Are there other considerations or proposals that AEMO might consider regarding the timing for implementation of the proposed changes?	No

3. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments