

CUSTOMER SWITCHING IN THE NEM

FIRST STAGE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: Endeavour Energy

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Table of Contents

- 1. Context 3
- 2. Questions raised in the NEM Customer Switching Issues Paper 3
- 3. Other Issues Related to Consultation Subject Matter20

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?	<p>Out of the two options presented we support option 1, which is to limit the 1000 series CRs to a change of FRMP only, as this will remove the potential for other parties to delay the retail transfer should they exercise their right to object. The FRMP can then change the MC with another CR if required. Although this introduces a two-step process we note that AEMO indicated that in 2018 MC changes with retail transfers was less than 0.1%.</p> <p>We do not support option 2, which is to remove the ability for a MC to object to being nominated for a NMI.</p> <p>We note that AEMO is seeking a process that can make the retail transfer occur within two days (or even sooner), MCs are seeking the right to object if they were nominated by a retailer they do not have a contract with or for a NMI that they wish not to provide services for, and retailers are seeking the</p>

Question No.	Question	Participant Comments
		<p>right to nominate their preferred MC from the same date when they become responsible for a NMI to avoid contractual complexities.</p> <p>We wish to suggest other options for consideration:</p> <p>Option 3: This option would allow the New FRMP to continue nominating a MC and for the nominated MC to continue to have the right to object. A new obligation is then placed on the New FRMP to make the retail transfer complete within 2 days. This means that it would be in the interest of the New FRMP to make sure that they nominate the right MC. Should the MC nomination be correct but there is an issue on the MC side to cause the objection then it would be the FRMP's responsibility to contact the MC and resolve the matter. This new obligation should be monitored by AEMO for compliance.</p> <p>Option 4: This option builds on option 3. Due to the current design of MSATS and the CATS Procedure, option 3 makes the retail transfer at least a 2 day process – primarily driven by the objection logging period. This can be explained further by looking at the objection process. Currently when a party, like a MC, has the right to object they normally execute a set of validation rules. If the validation fails then they raise an objection, which signals to MSATS that the CR should not progress further. On the other hand if the validation passes, meaning that they approve the nomination, they signal this by not raising an</p>

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		<p>objection. MSATS’s current design is that the objection waiting period must expire without any objection before the CR can progress further. This means that MSATS is currently designed to look for the absence of an objection before the CR is allowed to progress further. This design has an inherent delay because it has to allow time for parties to exercise their right to raise the objection. To overcome this, we propose that there should be an ‘approved’ signal. Using the MC in our example again, if the MC’s validation passes instead of staying silent they should send the ‘approved’ signal. MSATS should then check if all the parties who have a right to object have sent an ‘approved’ signal, if yes then the CR can progress further and therefore not have to wait for the objection logging period. We expect that parties will raise this ‘approved’ signal on the same day, or even within an hour, of receiving the PEND notification for the CR. Therefore the expected benefit is that the retail transfer could be completed within 1 day.</p>
2	<p>Are the issues raised by AEMO regarding restrictions being placed on an MCs ability to object to an appointment reasonable?</p>	<p>We agree that a MC should be allowed to object to being nominated for a NMI. This could be for reasons such as the MC does not have a contract with the retailer or the MC should not be the MC due to the metering installation type.</p> <p>AEMO’s proposal to adopt option 1, which is to limit the 1000 series CRs to a change of FRMP only, would remove any retail transfer delay that could be</p>

Question No.	Question	Participant Comments
		<p>caused by a MC exercising their right to object. Therefore if option 1 is adopted then there would not be any reason for restricting an MC to raise an objection.</p> <p>We believe the alternative, which is to remove objection rights from the MC and instead make retrospective corrections, would be more complex and time consuming, especially given that the MC that is impacted does not have the ability to fix the issue themselves and must rely on other parties instead.</p> <p>Note that we have suggested alternative options under question 1 that looks to address each key party's desires.</p>
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
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	No comment

Question No.	Question	Participant Comments
	the customer switch?	
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?	<p>AEMO proposed to redesign existing CRs and allow for a phased transition. This approach introduces system complexities which are expensive and from experience would cause industry confusion, thus causing delays in transfers when retailers raise an incorrect CR.</p> <p>We suggest that a 'clean start' approach should be adopted. This is where all existing in-flight CRs are cancelled at the go-live date and new CRs are raised under the new framework. We note that the new framework is meant to be better for the customer, therefore this approach should not make any customer worse off.</p> <p>In addition to avoiding significant system change costs, we suggest that existing CRs should not be re-defined and instead that they should be maintained as is, unless they are to be deleted as they are no longer required. In a similar manner, we suggest that existing Read Type Codes should not be re-defined and instead that they should be maintained as is, unless they are to be deleted as they are no longer required.</p> <p>To introduce the changes that AEMO desires, we suggest that new Read Type Codes be introduced for existing CR Codes. This would help to foster a</p>

Question No.	Question	Participant Comments
		<p>'clean start' approach from a system point of view.</p>
7	<p>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?</p>	<p>AEMO proposed to delete the Read Type Code of NS (Next Scheduled Read Date) to support the objective of making transfers occur within 2 days. We note, for the scenario where an in-situ customer looks to switch retailers after receiving their electricity bill, AEMO explained that allowing a retrospective transfer to a previous read within the last 15 business days would provide customers a better experience than having to wait for the next schedule read date or obtaining a special read.</p> <p>For the scenario where an in-situ customer looks to switch retailers beyond 15 business days from their last bill then AEMO explained that they can still do so on an actual read via a special read, and now they also have the option to transfer on a substituted read.</p> <p>For the scenario where an in-situ customer wants to transfer on an actual read and coincidentally the next scheduled read is due soon (like within 2 days, the main objective of this change), then AEMO explained that the cost of a special read can be avoided if the retailer waited for the read to complete and then a retrospective change is arranged.</p> <p>For a move-in customer scenario, AEMO explained that in practice this generally requires a site visit to</p>

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		<p>reconnect the customer and there is a stronger desire by customers to transfer on an actual read in this scenario. An added benefit is that the risk of any under or over charging is eliminated because an actual read is used instead of a substituted read.</p> <p>We believe that AEMO has considered all the scenarios for a customer changing retailers and agree with the removal of the Read Type Code of NS because it does not align with the objective of this change and there are alternate options that will provide the same or better customer outcome.</p>
8	Is there value in retaining an ability for a prospective change of FRMP role to occur based on a special reading?	We believe that there is value in allowing a prospective change of FRMP to occur based on a special reading. This is for the scenario where the customer or retailer wants to transfer on an actual read.
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?	We believe that there is value in maintaining the NSRD in NMI Discovery to help the New FRMP decide whether to transfer on a special read or wait to retrospectively transfer after the NSRD.
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	We note that AEMO's proposal to introduce two new fields (Last Read Date and Last Read Quality Flag)

Question No.	Question	Participant Comments
	AEMO might consider?	<p>is to allow a retrospective transfer to occur on this date provided it is within the last 15 business days. The use case for this is that the customer receives their electricity bill, which prompts them to consider changing retailers for a better rate, service or product. Allowing the retail transfer to occur on the last bill date would produce an outcome whereby the customer can end their contract with their current retailer effective from the last bill date and can enjoy the benefits offered by the new retailer immediately.</p> <p>AEMO is seeking feedback on this proposal, in particular how this can be best achieved in practice. Please see below our suggestion in order of preference:</p> <ol style="list-style-type: none"> 1. We wish to highlight that AEMO’s proposal may not work well for customers who are on a ‘bill smoothing’ product whereby their last bill date may be after the last read date. To better achieve AEMO’s intent we suggest that the two new fields be ‘Last Bill Date’ and ‘Last Bill Quality Flag’ and that the current FRMP be obligated to maintain these fields. This option would require the MDP to substitute the metering data if a reading does not exist for the transfer date. 2. Should AEMO use the ‘Last Read Date’ and ‘Last Read Quality Flag’ then we suggest that

Question No.	Question	Participant Comments
		<p>this is best achieved by not duplicating the same information through the introduction of two new fields. Instead AEMO should utilise existing available information and make it discoverable via NMI Discovery. This is in essence what is described in Option 2, however we encourage AEMO and retailers to work together to find a format that requires minimal system modification, for example existing RM reports should be explored to avoid the disadvantages AEMO described for option 2.</p> <p>3. If AEMO insists on introducing the two new fields, then we suggest AEMO populates these fields with the information that they receive. This is a hybrid of option 1 and 2 that AEMO described and provides the benefit that only party, AEMO, needs to make system changes instead of many MDPs needing to make system changes.</p> <p>4. Lastly, if AEMO insists on introducing the two new fields and mandating that the MDP be responsible for maintaining these fields then we suggest that this be done by modifying the CR5070 & CR5071 change requests to include these two new fields. This will help to minimise the volume of transactions given that in most instances these two fields will</p>

Question No.	Question	Participant Comments
		<p>need to be updated at the same time as the NSRD.</p> <p>Note that we do not support option 3 that AEMO described as we believe that there is value in maintaining the NSRD in MSATS – see our response to question 9 for more detail.</p>
12	<p>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?</p>	<p>We wish to highlight that AEMO’s proposal may not work well for customers who are on a ‘bill smoothing’ product whereby their last bill date may be after the last read date. To better achieve AEMO’s intent we suggest that the two new fields be ‘Last Bill Date’ and ‘Last Bill Quality Flag’ and that the current FRMP be obligated to maintain these fields</p>
13	<p>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’?</p>	<p>We do not see any issue with an in-situ retrospective transfer of up to 15 business days. We note that some customers are on a monthly billing cycle via a ‘bill smoothing’ product and therefore see that there would be issues if the allowable retrospective transfer days approaches the billing cycle days. We see that 15 retrospective business days provides sufficient time for customers to engage with a new retailer from the time of their last bill without impacting on market functions.</p>
14	<p>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</p>	<p>We disagree with AEMO’s proposal to redefine CR1000 to become both prospective and retrospective because this would require significant</p>

Question No.	Question	Participant Comments
	3.1.2)?	system changes for little benefit. We suggest that CR1000 be maintained for prospective transfers only and CR1010 be maintained for retrospective transfers.
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'?	Similar to our response to question 13 we do not see any issue with a move-in retrospective transfer of up to 15 business days provided it is made clear in the procedure, and AEMO enforces this through MSATS validation, that a CR1040 is only allowed on an actual meter reading.
16	Should the use of a recent reading be limited to customers who have manually read metering installations? Smart metering 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?	We are supportive of allowing a customer with a smart meter to retrospectively transfer within the last 15 business days provided that AEMO adopts the earlier suggestion that the current FRMP be obligated to maintain the 'Last Bill Date'. Otherwise we believe that there could be inadvertent market complexities and reduced customer experience if the transfer did not occur on the customer's last bill date.
17	Has AEMO overlooked any requirement or reasonable justification for the retention of the five embedded network-specific CRs?	No comment
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

Question No.	Question	Participant Comments
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?	We support AEMO's proposal to delete CR1026 and the creation of CR1060 for retailer reversal due to the customer exercising their cooling of rights
20	What problems, if any, might be caused by the removal of the error correction CRCs 1022, 1027 and 1028?	We support the removal of CR1022, CR1027 and CR1028 as this will remove CRs that are rarely used. We note that AEMO identified these three CRs were collectively used less than 25 times in 2018.
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?	We suggest that CR1021 be removed. We note that the intent of having different error correction codes is to monitor what is causing the need to perform error corrections. With the proposed changes there will a large reduction for the need of a CR1500, and with our suggestion for a new objection code (see below for our feedback on clause 4.7) we believe that this will provide better information on whether the issue is because a CR1500 was missed or for another reason.
22	Are the changes proposed to the objection codes available to MCs regarding MC role appointment reasonable?	<p>We agree that a MC should have the right to object, however we note that AEMO is looking to define the scenarios when an Initial MC can object using the DECLINE code. AEMO provided an example where a retailer genuinely made a mistake and wants to revert the MC role back to the Initial MC. We agree with the example provided that the Initial MC should allow the MC reversion to occur.</p> <p>However we believe that AEMO's proposed change</p>

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		<p>is unnecessary because the volume we have experienced is low (1 or 2 per month) and we have worked with retailers and other MCs to allow the reversion of MC role where appropriate, like the example AEMO provided. Therefore we do not see this as a significant issue that warrants the proposed change which would require costly system changes. We suggest an obligation to not unreasonably withdraw an objection when requested would be more appropriate (this could be placed in section 2.6 of the CATS Procedure).</p> <p>If AEMO wants to define scenarios when an Initial MC is allowed to raise an objection then we suggest the following be added as allowable objection scenarios:</p> <ol style="list-style-type: none"> 1. When the Initial MC is nominated for a greenfield NMI 2. When the Initial MC is aware that the type 5 or 6 metering installation needs to be changed to a type 4 metering installation 3. When the Initial MC did not approve the installation or alteration made to a type 5 or 6 metering installation <p>Below is an explanation for the above scenarios:</p> <ol style="list-style-type: none"> 1. All greenfield NMI must have a type 4

Question No.	Question	Participant Comments
		<p>metering installation, therefore it is not appropriate for an Initial MC to be the MC for a greenfield NMI</p> <ol style="list-style-type: none"> 2. Example includes solar installed or the service upgraded from single to multi phases, whereby the existing metering installation needs to be upgraded 3. Example includes a type 6 meter removed from one metering installation and installed at another metering installation <p>Regardless of what scenario is defined to be an allowable reason for an Initial MC to raise an objection, it should be made clear that any retailer wishing to nominate an Initial MC should obtain their prior agreement before raising the change request. This would allow the Initial MC to understand the scenario and time to confirm if any of the allowable objection scenarios apply.</p>
23	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?	See our response to question 22
24	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?	We believe that MCs should have the right to object, which could be for reasons such as the MC does not have a contract with the retailer or the MC should not

Question No.	Question	Participant Comments
		<p>be the MC due to the metering installation type.</p> <p>In addition, MCs should also be given an appropriate time to exercise their right to object. We believe that a zero day objection period is insufficient because this could range from 24 hours to minutes just before midnight for the MC to process, validate and if necessary raise an objection. Should a MC not receive sufficient time to raise an objection then this would lead to the MC having to arrange for a retrospective correction, which would be more complex and time consuming, especially given that the impacted MC does not have the ability to fix the issue themselves and must rely on other parties instead.</p> <p>Note that we have suggested alternative options under question 1 that looks to address the issue AEMO wants to resolve without reducing the MC's right to object.</p>
25	<p>Would MCs reasonably be capable of determining whether to object to transfers if the objection period for MC nomination was reduced to zero days?</p>	<p>See our response to question 24. We suggest that the objection period be maintained as 1 business day.</p> <p>Note that we have suggested alternative options under question 1 that looks to address the issue AEMO wants to resolve without reducing the MC's right to object.</p>

Question No.	Question	Participant Comments
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?	<p>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 should be made clearer to identify which CR code can be used for which scenario.</p> <p>The order of section 6 to section 41 is not listed in CR Code order which generally causes confusion for most readers as it is generally expected to be in order. We suggest that AEMO considers the order of these sections so that is more intuitive and easier for the reader.</p>
27	Do MSATS Participants believe that the proposed changes materially alter the obligations placed on them within the MSATS procedures?	No comment
28	Is the change to the reason code in the MDFF necessary?	We agree with AEMO's proposal to have a reason code of 67 for substitutions created due to a transfer as this will help with auditing and any disputes.
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	We disagree with AEMO's proposal to make the procedures effective 20 May 2020. We note that

Question No.	Question	Participant Comments
	proposed timing for implementation reasonable?	<p>AEMO plans to release the final determination on 21 February 2020, which would provide only 3 months for participants to design, build and test significant changes to their systems and processes. From past experience changes that were not as significant as this change were afforded six months before they became effective.</p> <p>We believe that given the size and complexity of this change around 9 months is required, which would mean, at the earliest, an effective start date in quarter 4 of calendar year 2020.</p>
31	Are there other considerations or proposals that AEMO might consider regarding the timing for implementation of the proposed changes?	<p>Due to the size and complexity of issues expected to be raised during consultation we suggest that AEMO highlight their key decisions/direction, preferably through a webex workshop, prior to publishing their draft determination and final determination. This will help industry to better understand AEMO's position and allow for an open dialogue to identify major issues.</p> <p>We also request that at least 2 more weeks is provided for participants to provide their feedback on the draft determination. The combination of complex issues along with a holiday period means that feedback by 23/01/2020 is insufficient.</p> <p>In addition, the successful implementation of this change is important to ensure minimal impact to the</p>

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		<p>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.</p>

3. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
<p>Clause 2.2</p>	<p>We suggest that a new clause be added as follow. Please see our response to question 22 for more detail:</p> <p>“The Current FRMP must obtain prior agreement from the Initial MC prior to raising a change request to revert the MC role back to the Initial MC”</p>
<p>Clause 2.4.i</p>	<p>This clause is not clear on what needs to be provided to the New FRMP, given that the New FRMP has access to CATS Standing Data via NMI Discovery. We suggest that this clause be clarified or deleted if redundant</p>

Heading	Participant Comments
Clause 2.4.m	We believe that the word 'or' should be 'and' in this sentence, and for better clarity we suggest the words 'Proposed Date' be replaced with 'Actual Change Date'
Clause 2.4.r	<p>It should be made clearer that any last read that is substituted (for whatever reason including a retail transfer) should also trigger the need to update these new two fields. We suggest rewording this clause to:</p> <p>"For metering installations that are manually read, update the Last Read Date and Last Read Quality Flag within two business days of a meter being read or the last read being substituted or last read been updated."</p>
Clause 2.6.i	This clause is not clear on what needs to be provided to the New FRMP, given that the New FRMP has access to CATS Standing Data via NMI Discovery. We suggest that this clause be clarified or deleted if redundant
Clause 3.1.d	We suggest that this clause be moved to the Glossary as it is defining the terms 'Current' and 'New'
Table 4-A	<p>We disagree with the deletion of CR1010. Please see our comments to question 6 for more detail.</p> <p>Also we note that AEMO is proposing that CR1023 be restricted to SMALL NMIs only. We believe that this should be applicable to all NMIs because it is not unreasonable for a large customer to initially sign up with a retailer and later change retailers prior to a metering installation being installed. Therefore we suggest that this restriction be removed.</p>
Clause 4.7	For the DECLINE objection code, we request that the below be added. Please see our response to

Heading	Participant Comments
	<p>question 22 for more detail:</p> <ul style="list-style-type: none"> • When the Initial MC is nominated for a greenfield NMI • When the Initial MC is aware that the type 5 or 6 metering installation needs to be changed to a type 4 metering installation • When the Initial MC did not approve the installation or alteration made to a type 5 or 6 metering installation
<p>Clause 4.7</p>	<p>We suggest that a new objection code, for example NOSORD, be made available to allow a MDP to raise if a change request with a SP Read Type Code was raised and a corresponding service order is not received prior to or on the same day as when the change request was raised.</p> <p>This would allow the MDP to communicate to the New FRMP that the change request cannot complete because they have not yet raised a corresponding service order. This will help to facilitate a faster transfer and reduce manual enquires about the status of the transfer.</p>
<p>Clause 4.7</p>	<p>We suggest that a new objection code, for example NOREAD, be made available to allow a MDP to raise if a change request with a SP Read Type Code was raised and the MDP was unable to obtain an actual meter reading for all meters, beside for the reason of no access. This could be used for scenarios like one of the meter was faulty or the type 6 meter has been replaced. This would allow for better communication on why an actual read could not be obtained and allow retailers to make better decisions on their next step.</p>
<p>Clause 4.13</p>	<p>The Read Type Code of PR:</p> <ul style="list-style-type: none"> • This does not align with what is stated in the issues paper. The issues paper suggests that

Heading	Participant Comments
	<p>PR will not be available but the draft procedures suggests that PR is available. Please clarify the intent.</p> <p>The Read Type Code of RR:</p> <ul style="list-style-type: none"> • Should be worded to allow for an actual read to be used if the actual read date aligns with the Actual Change Date • Suggests that it could be used for both prospective and retrospective. This seems to contradict the intent of having PR. Please clarify the intent. • It is unclear if for a retrospective scenario whether the MDP is required to generate a substitution if a read is not available on the Actual Change Date. Please clarify the intent. • It does not put any restriction for a move-in scenario, which should only allow a retail transfer on an actual read. This restriction should be made clearer and more explicit. <p>The Read Type Code of SP:</p> <ul style="list-style-type: none"> • It should be made clearer that the service order must be raised prior to or on the same day that the change request is raised. Alternatively, this could also be spelt out in clause 2.2 <p>Note that we have suggested that existing Read Type Code should not be redefined but instead new ones be created. Please see our response to question 6 for more detail</p>
<p>Clause 4.14</p>	<p>We suggest that a quality flag hierarchy be defined for when the metering data has multiple quality flags on the date of the last read. We suggest that the hierarchy be, in order of what</p>

Heading	Participant Comments
	<p>should be populated if the metering data has one of these flags:</p> <ul style="list-style-type: none"> • S • F • A <p>Note that we have suggested alternative options for these two fields. Please see our response to question 11 for more detail.</p>
<p>Clause 6.3</p>	<p>It should be made clear that CR1030 (move-in) must have a Read Type Code of SP only. This is based on the principle that a move-in can only occur on an actual read. In addition, we suggest that AEMO update MSATS to validate this.</p>
<p>Clause 6.4.b.ii</p>	<p>We suggest that if the MDP is unable to obtain an actual reading then an objection is raised (see our feedback to clause 4.7 suggesting a new objection code). This will allow for better communication and quicker decision making by the retailer on the next step rather than receiving this information via other channels like email or phone calls.</p>
<p>Clause 6.4.c</p>	<p>This clause should make it clearer that if an actual read exists for the Actual Change Date then the actual reading should be used</p>
<p>Clause 6.5</p>	<p>We suggest that the objection logging period be 1 day when the Read Type Code is SP. This is to allow for the MDP to raise an objection when there is no corresponding service order (see our feedback to clause 4.7 suggesting a new objection code), with an objection clearing period of 0 days</p>

Heading	Participant Comments
Clause 6.5	We wish to highlight that the prospective period is still 65 days, which does not seem to align with the intent of a fast transfer. Please clarify the intent.
Clause 7.4	For clarity, we believe there are benefits in describing the validations that will be performed by MSATS, for example will the Proposed Change Date for CR1060 be validated to align with the Actual Change Date of the Related Change Request?
Clause 24.4.c	<p>It should be made clearer that any last read that is substituted (for whatever reason including a retail transfer) should also trigger the need to update these new two fields. We suggest rewording this clause to:</p> <p>“Provide the Last Read Date and Last Read Quality Flag to MSATS within 2 days of reading the meter or the last read being substituted or last read being updated.”</p>
Clause 24.4.d	The field called MDP is redundant and should be removed
Clause 24.7	<p>We expect the volume of CR5072 to be similar to CR5071 and therefore, similar to the CR5071 notification rules, there should be no notifications for CR5072 either.</p> <p>Note that we have suggested alternative options for CR5072. Please see our response to question 11 for more detail.</p>