

## STAKEHOLDER FEEDBACK TEMPLATE

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in this paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

### SUBMITTER DETAILS

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### CHAPTER 3 – 3.1 PROPOSED NER AMENDMENTS

<p>1. Do you agree that clause 7.8.9(e)1 of the NER restricts the delivery of the proposed changes to the customer transfer procedures and process?</p>	<p>We agree that clause 7.8.9(e)1 hinders the proposed changes to the customer transfer procedures and process because a Metering Coordinator, Metering Provider or Metering Data Provider may raise an objection to them being nominated in the Change Request thereby delaying the transfer of the Retailer.</p>
<p>2. Are there any impacts from removing clause 9.8.9(e) 1 from the NER and allowing the MC, MP or MDP roles for metering installations to be nominated in the procedures but as a separate request or in parallel to a retail customer transfer?</p>	<p>We agree with AEMO's proposal to remove clause 7.8.9(e)1 from the NER and allowing AEMO to define the more technical detail and requirements for managing transfers in the MSATS Procedure. This will allow for better flexibility as the customer transfer design evolves.</p> <p>The MSATS Procedure is subject to Rules consultation requirements therefore any impacts can be managed through the consultation process.</p> <p>We suggest that if clause 7.8.9(e)1 is removed from the NER then the AEMC should consider the principles or constraints that the MSATS Procedure must consider or abide by. For example, an Incoming Retailer may not be allowed to initiate meter churn until they become the financially responsible Market Participant, and a Metering Coordinator may not be allowed to arrange a meter churn at a metering installation until they are recorded as the Metering Coordinator in MSATS for that metering installation.</p>
<p>3. Are there any unintended impacts from removing or clarifying clause 7.8.9 (e) 2 of the NER and including the requirement in AEMO's meter churn procedures?</p>	<p>We agree with AEMO's proposal to remove clause 7.8.9(e)2 from the NER and allowing AEMO to define the more technical detail and requirements for managing meter churn in the Meter Churn Procedure.</p> <p>The Meter Churn Procedure is subject to Rules consultation requirements therefore any impacts can be managed through</p>

	the consultation process. We note that AEMO has incorporated the requirements of the Meter Churn Procedure into the Metrology Procedure Part A.
4. Are the existing provisions in the NERR related to customer billing impacting consumers utilising alternative meter read options and switching electricity retailers in a timely manner?	Clause 21(1).b of the NERR should be updated to allow the retailer to generate their own substitution if for any reason they cannot reasonably or reliably base the bill on a substitution provided by the MDP.
5. Is there any evidence to suggest that customers with manually read metering installations would not take up alternative meter read options to transfer retailers in a timely and seamless manner?	<p>The rules should make transfers for a customer move-in scenario only allowed on an actual meter read. It is noted that section 4.1.2 of AEMO's High Level Design identifies 2 of the issues introduced by using substituted reads would be addressed by using an actual meter read for a customer move-in scenario.</p> <p>The current timeframe in NSW to complete a reconnection and obtain an actual read (within 1 business day if we receive the request prior to 3pm otherwise within 2 business days) means that it would, in most cases, still be supporting the objective of transferring a retailer within 2 days (provided that there is safe access to the meter, something that the customer is responsible for).</p>
6. Based on AEMO's proposed high level design and changes to the existing procedures, are clarifications required to clause 21(1) of the NERR to remove ambiguity about issuing final bills on estimate metering data?	We agree with AEMO that that a customer self-read should not be allowed to be used for a retail transfer. We note that the Metrology Procedure deems a customer self-read to be an substituted metering data, therefore if the Rules allows retailer transfers to occur on a substituted meter read then for the avoidance of any doubt it should also explicitly state that a customer self-read is not be allowed to be used for a retail transfer.
7. Are additional provisions required in the NERR to address overcharging and dispute resolution arrangements in situations when a retail electricity customer has transferred using estimate meter read?	<p>The rules should make it clear that customers and retailers are not allowed to dispute the substituted read with the MDP or Network if the substitution was calculated as per the Metrology Procedure. Instead we believe that allowing customers and retailers to agree on a customer self-read or on another substitution generated by the Retailer (see above our suggestion to allow the retailer to generate their own substitution under clause 21(1).b) would be more efficient.</p> <p>We note that the Metrology Procedure states that a substituted read is to be replaced if the substitution is found to be inaccurate (clause 2.2.j of Metrology Procedure Part A) – this clause should be updated to exclude a substitution created for retail transfer.</p>
8. Is there any additional information requirements needed for a customer to transfer retailers using different forms of meter reads, including self, last	

billable or estimate meter read?	
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## CHAPTER 4 – ASSESSMENT FRAMEWORK

<p>9. Are there any other matters that should be considered in the proposed assessment framework for this rule change request?</p>	<p>It looks like AEMO's High Level Design has not consider the scenario where there is a change in customer (e.g. new customer move-in, or the customer just wants to change account holder from one person to another), there is no change in the retailer and all impacted customers agrees to make the changes effective on substituted metering data. In this scenario, a special read service order to obtain actual data is not appropriate and there is no need to submit a change request (because there is no change in retailer). We suggest that in this scenario the retailer should generate their own substituted metering data as it would have no bearing to AEMO's settlement or the Network Bill. We note that clause 21(1).a already supports this, but it should be clarified that it is also applicable for a final bill.</p> <p>The current timeframe to obtain a special read is 3 business days (clause 3.4.c of the MDP SLP). We suggest that this timeframe be maintained to minimise cost increases for a tighter timeframe.</p> <p>We note that AEMO intends to remove the ability for participants to raise an objection on retail transfers (except in Victoria) to support the objective of making retailer transfer occur within 2 business days, and in addition, transfer on the last billable meter read would be allowed. We wish to highlight that the last billable meter read date is currently not always visible to the new retailer. Therefore, either participants be allowed to raise an objection if the proposed retail transfer date does not align with the last billable meter read date or the solution is designed to make the last billable meter read date visible to the new retailer.</p>
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