

## 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>NO.</p> <p>PLUS ES believes that Clause 7.8.9 (e)1 does not restrict the delivery of the proposed changes to the customer transfer procedures and process. They are mutually exclusive.</p> <p>Re-engineering of the current MSATS procedures will alleviate the challenges currently faced with participant objections delaying the customer transfer</p> <p>For example, suggested reviews to include but not limit:</p> <ul style="list-style-type: none"> <li>• objection period, which participant can object, if any and in what circumstances</li> <li>• allowing incoming Retailers to nominate incoming participant roles outside the CR1xx series.</li> </ul>
<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>Assume the clause referenced is 7.8.9 (e) 1.</p> <p>PLUS ES believes the removal of this clause will constrain and restrict the deployment opportunities in delivering metering installations with efficiencies for the customer.</p> <p>The clause defines an outcome not a procedure. It may have to be re-worded to remove ambiguity.</p> <p>By removing this clause, it effectively removes the enabler to allow an incoming Retailer to arrange and streamline a meter installation as close as possible to a FRMP churn date.</p> <p>For example,</p> <ul style="list-style-type: none"> <li>○ An MC cannot access NMI Standing data for the metering installation via the C7 report until they have been nominated in MSATS. If the clause was to be removed this would add a minimum of 2 bus days to the timeline which would otherwise be available to the MC.</li> </ul> <p>MSATS Procedures support the Rules and if it is not in the Rules it does not get implemented in the procedure. Participants become weary and risk averse with respect to market processes when they cannot reference word for word</p>

	<p>the rules and/or procedures.</p> <p>PLUS ES recommends retaining the clause to allow full access to all parties from initiation of FRMP churn. The procedures can be tailored to ensure an efficient process is possible for all parties to effect the customer transfer.</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>There are unintended impacts from removing clause 7.8.9.e(2).</p> <p>By removing this clause, it effectively removes the enabler to allow an incoming Retailer to arrange and streamline a meter installation as close as possible to a FRMP churn date.</p> <p>MSATS Procedures support the Rules, and if it is not in the Rules it does not get implemented in the procedure. Participants become weary and risk averse with respect to market processes when they cannot reference word for word the rules and/or procedures.</p> <p>For example, this clause was a trigger for the B2B procedures to be amended and enable an incoming Retailer to raise a meter exchange service order. If this clause was to be removed, the B2B procedures may effectively be changed accordingly.</p> <p>PLUS ES recommends retaining the clause to allow full access to all parties from initiation of FRMP churn. The procedures can be tailored to ensure an efficient process is possible for all parties to effect the customer transfer.</p>
<p>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?</p>	
<p>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>	<p><b>Special Read meter readings to facilitate customer transfer</b></p> <p>There is no guarantee that a Special Read timeframe will enable the 2-bus day timeframe targeted by the proposed customer transfer process.</p>
<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?</p>	
<p>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>	

<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?</p>	
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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>	<ul style="list-style-type: none"> <li>• <b>Existing Parties not notified of pending FRMP churns:</b> <ul style="list-style-type: none"> <li>○ Inflight SOs during a FRMP Churn – The instances of inflight SO are projected to increase with the proposed changes to the customer switching process. The Rules and associated procedures should clearly define the market expectation. Consideration should be given to the impacts to the customer and associated compliance requirements to existing Rules. As an existing MC/MPB/MDP the SO is actioned appropriately, unless one of the following occurs: <ul style="list-style-type: none"> <li>○ The requesting Retailer has lost the site – FRMP churn ‘completed’ notification has been sent to participants or</li> <li>○ The requesting Retailer has sent a cancellation</li> </ul> </li> <li>○ For avoidance of doubt the Retailer on the day the service was performed, will be the invoiced Retailer.</li> <li>○ It is important that participants are still notified and allowed to Object to Retrospective Transactions.</li> </ul> </li> <li>• <b>Customer self-readings:</b> <ul style="list-style-type: none"> <li>○ If the NERR were to be amended to extend the current provisions for use of customer self-readings for final bills, it should also clearly indicate that MDPs will not be obliged to use the self-readings to update the meter data of their NMIs.</li> </ul> </li> <li>• <b>Meter Installation Timeframes NER clause 7.8.10 B &amp; C (meter exchange):</b> <ul style="list-style-type: none"> <li>○ Possible impacts to the metering installation timeframes, where the MC/MPB is responsible for delivering within those timeframes. <i>Failing agreement, the retailer has 15 bus days from when they received the small customer request for a meter to be installed</i> Clarification is sought: when does the timeframe begin: <ul style="list-style-type: none"> <li>○ When the FRMP churn is completed in MSATS or</li> <li>○ When the customer approaches the incoming FRMP and requests the meter installation?</li> </ul> </li> </ul> </li> </ul>
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