

Australian Energy Market Commission  
 PO Box A2449  
 Sydney South NSW 1235

Dear Sir/Madam,

**Draft Rule Determination**

**National Electricity Amendment (Reducing Customers' Switching Times) Rule**

PLUS ES welcomes the opportunity to provide feedback to the Australian Energy Market Commission's (AEMC) draft rule determination.

The rule change objective is to support and enable AEMO's request to significantly reduce the timeframe required for a customer to churn to another Retailer.

Whilst PlusES supports this change, we would like to also note points for consideration by the AEMC and the AEMO's procedure consultations with respect to the topic.

Topic	Detail
<b>Separation of the appointment of MC role</b>	<ul style="list-style-type: none"> <li>• PlusES believes that there are efficiencies driven in the nomination of the MC role by an <u>incoming</u> retailer. Even if:               <ul style="list-style-type: none"> <li>○ the objection period is reduced to zero days, or</li> <li>○ there is a retrospective change</li> </ul>               it will still require, as a minimum, an additional <b>one</b> bus day to churn a MC role in the market following the completion of the FRMP churn.             </li> <li>• The concern of the objections and the possible delays should be resolved via procedural changes not by the removal of the rule for an incoming retailer to nominate an MC.</li> </ul>
<b>FRMP churn notifications to participants</b>	PlusES proposes: <ul style="list-style-type: none"> <li>• Best practices should support the participants (at minimum an MC) associated with the customer NMI to receive notifications of the requested/pending FRMP churn. The provision of notifications:               <ul style="list-style-type: none"> <li>○ Should not impact the switching timeframes and</li> <li>○ They trigger downstream activities</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>The proposal to inform the associated participants after the completion would not allow downstream activities to be triggered in a timely manner. i.e. meter exchange scheduled for the same day etc.</li> </ul>
<b>Meter Installation Timeframes – NER clause 7.8.10B &amp; clause 7.8.10C</b>	<p>PlusES acknowledges that AEMC’s response to the initial consultation was that the recommendation was out of scope. We would like AEMC to consider amending the wording of the identified clauses to avoid any doubt/ambiguity.</p> <p>The wording:</p> <p>on a date no later than 15 <i>business days</i> after the <u>retailer received the request</u> from the <i>small customer</i> for the <i>meter</i> to be installed</p> <p>should be amended to provide clarity in instances of the customer request being received in parallel with a FRMP churn.</p> <p>Whilst this scenario exists today, the shortened timeframes for FRMP churning may result in a literal interpretation of the wording. Including the FRMP churn timeframe into the metering installation timeframes, would impact the 15 bus days compliance.</p>

PLUS ES would welcome any further discussion in relation to this submission. If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at [Helen.vassos@pluses.com.au](mailto:Helen.vassos@pluses.com.au).

Sincerely,



**Darren Ferdinands**  
Head of Metering - PLUS ES