Improving the accuracy of the electricity customer transfer process
Rule Change Request

October 2015

1. Name and address of rule change proponent

Council of Australian Governments (COAG) Energy Council
Senior Committee of Officials
COAG Energy Council Secretariat
GPO Box 9839
Canberra, ACT 2601

2. Description of the proposed Rule

The proposed rule is intended to improve the electricity customer transfer process, by improving the accuracy of the data that is used in transfers and by clarifying responsibilities to resolve mistakes in the transfer process.

The proposed changes to the National Electricity Rules (NER) allow for the introduction of an address standard to assist in resolving the most common issue in the customer transfer process, which is a mismatch between the address data that exists in the Market Settlements and Transfer Solutions (MSATS) system for each electricity consumption point, and the commonly used address of the customer's premises.

The above changes affect electricity customers through changes to the NER. However, when considering the changes to the NER, the Australian Energy Market Commission (AEMC) should also consider whether there are benefits in also applying these changes to gas retail markets through any necessary amendments to the National Gas Rules (and the National Energy Retail Rules (NERR)).

In addition to the amendments for the introduction of an address standard, additional changes to the NER and changes to the NERR are also proposed to confirm and strengthen the obligations on retailers to coordinate to resolve erroneous customer transfers in a timely manner.

2.1. *Introduction of an address standard*

National Electricity Rule changes

This proposal provides for specific obligations on the Australian Energy Market Operator (AEMO) to develop an industry address standard. This standard would be used by market participants when entering new data into the MSATS system. Once the standard has been implemented, compliance with the standard would be required via the MSATS Procedures for any new data entered into the MSATS system.

The new obligations will provide for the following:

- AEMO would be required to develop a standard for addresses by no later than six months after the rule change to give effect to this recommendation. In developing this standard, industry consultation would be appropriate. Accordingly, AEMO should be required to develop the standard in accordance with the rules consultation procedures.

- The content of the MSATS Procedures would include a requirement that National Meter Identifier (NMI) Standing Data comply with this standard for any new data entered into the MSATS system.
- Further, the MSATS Procedures would deal with how existing data would be brought into compliance with the standard.

The agreed standard should govern both content and structure of the address fields in MSATS. As is outlined in the AEMC's Review of Customer Switching, there are several existing address standards that could potentially be used:[1]

- Australia Post address standard;
- The ANZLIC address standard, which aims to provide a nationally-consistent, standards-based framework for addresses; or
- Geo-coded National Address File, which is a composite of information supplied by Australia's government mapping agencies and land registries, the Australian Electoral Commission and Australia Post.

As noted above, when considering this rule change request, the AEMC may wish to also consider whether there are benefits in also applying these changes to gas retail markets through any necessary amendments to the National Gas Rules. An address standard could then be used in relation to gas standing data (or data that is related to the Meter Installation Reference Number).

2.2 *Confirm and strengthen the obligations on retailers to coordinate to resolve erroneous customer transfers*

This proposal provides for the introduction of a rule in the NERR that places an obligation on retailers to resolve erroneous customer transfers in a timely manner.

National Energy Retail Rule[2] changes

It is proposed that the new rule would provide for the following situation: If a customer makes a complaint to their current or previous retailer that it has been transferred from the previous retailer erroneously, then the retailer that the customer initially contacts must:

- Resolve the complaint, expeditiously, in accordance with its standard complaints and dispute resolution procedures; and
- When resolved, give notice to the customer that the erroneous transfer has been rectified.

Consistently with the current structure of the NERR, the new rule would be limited to small customers. [3]

[1] AEMC, *Final Report: Review of Electricity Customer Switching* (10 April 2014), 48.
[2] Only applies in jurisdictions that have adopted the National Energy Customer Framework.

National Electricity Rules

In the event of an erroneous transfer the customer may contact a retailer who is neither the immediately past nor current retailer responsible for that customer (i.e. a 'third party' retailer with no financial interest).

Rule 7.7(a1) was inserted into the NER by the *National Electricity Amendment (Access to NMI Standing Data) Rule 2013.* Rule 7.7(a1)(1) provides that a '*retailer* is entitled to access or receive *NMI Standing Data* … after having first done whatever may be required or otherwise necessary, where relevant, under any applicable privacy legislation (including if appropriate making relevant disclosures or obtaining relevant consents from *retail customers*).' No restrictions are placed on the use of that data. It follows that under the current Rules, a 'third party' retailer may access NMI Standing Data (provided that it complies with relevant privacy legislation). The CATS Procedures were also amended as a result of the 2013 Rule Change on Access to NMI Standing Data.[4]

This allows the contacted retailer to identify who the customer should contact (i.e. the current financially responsible market participant) in order for the erroneous transfer to be resolved. This will support customer confidence in transfer processes and retail market competitiveness more broadly.

No further amendment to rule 7.7 is necessary for the purposes of this rule change request.[5]

3. Background to the proposed rule changes

3.1 Development of Retail Energy Markets

Since the late 1990s there have been a number of reforms to retail energy markets to introduce and enhance competition. As part of these reforms, state and territory governments have gradually introduced 'full retail contestability' (FRC), where all customers have the ability to choose their retailer of choice.

All jurisdictions in the National Electricity Market (NEM) have now introduced FRC however, this has occurred at different stages. The introduction of FRC has encouraged competition between retailers and allowed for more consumers to switch between electricity retailers. The opportunity to switch between retailers has been further enhanced in some jurisdictions (e.g. Victoria, South Australia and New South Wales) that have effective competition and have deregulated retail electricity prices.

As the retail electricity market has changed and evolved, small customers are now engaging in the market and transferring between retailers more frequently. Given these changes, it is timely to consider the effectiveness of the current transfer process and whether it is

[3] The new rule is best located in Part 2, Division 9 of the National Energy Retail Rules, which relates to "other retailer obligations." Part 2 of the NERR deals with 'customer retail contracts', which is limited to contracts between retailers and small customers. There is currently no Part in the NERR that specifically deals with the relationship between retailers and large customers.

[4] MSATS Procedures: CATS Procedures Principles and Obligations, p 181.

[5] Cf AEMC, *Final Report: Review of Electricity Customer Switching* (10 April 2014), 72-73.

operating most effectively and efficiently to allow for, and to enhance, the customer switching process.

It is also important to consider how the retail market may evolve in the future, including changes that are already occurring such as the roll-out of smart meter technologies and the introduction of contestability in metering and related services for small customers. It is important that measures to enhance the customer transfer process do not inhibit the advance of such technologies.

3.2 Energy Market Reform

In December 2012, the Council of Australian Governments (COAG) and the former Standing Council on Energy and Resources (SCER) (now the COAG Energy Council) agreed to a broad energy market reform package to support investment and market outcomes in the long term interests of consumers.

3.3 AEMC Power of Choice Review

In November 2012, the AEMC published its Final Report "*Power of choice review- giving consumers options in the way they use electricity*" (the Power of Choice Review).

The overall objective of the Power of Choice Review was to ensure that the community's demand for electricity services is met by the lowest cost combination of demand and supply options. The Power of Choice Review identified opportunities for customers to make more informed choices about the way that they use electricity. It noted that customers require tools, such as: information; education; technology; and flexible pricing options to make efficient consumption decisions. It also addressed the market conditions and incentives needed for network operators, retailers and other parties to maximise the potential of efficient Demand Side Participation (DSP) and respond to customers' choices.

In the Power of Choice Review, the AEMC made a number of recommendations across nine priority areas. These recommendations included gradually phasing in efficient and flexible pricing options, and introducing competition in metering and related services to allow customers to receive smart meters where there is a benefit for them.

Another recommendation in the Power of Choice Review was that the former SCER should direct the AEMC to review whether the current arrangements for customer switching support the efficient and timely transfer of electricity customers between retailers. This was driven by the fact that the AEMC had identified that the maximum allowable prospective timeframe for transferring customers between retailers in the NEM was 65 business days and this appeared to lag behind other countries, with the maximum timeframe elsewhere typically ranging between 10 and 20 business days.

As a result of the recommendations in the Power of Choice Review, the former SCER directed the AEMC to undertake a review of customer switching arrangements in the NEM.

3.4 AEMC Customer Switching Review

In May 2013, the former SCER issued the AEMC with Terms of Reference to undertake a *Review of Electricity Customer Switching in the National Electricity Market (NEM)* (the Review) and on 10 April 2014, the AEMC released its Final Report.

The Review identified a range of areas of improvement to the current customer transfer process, in particular its timing and its accuracy and made recommendations to the former SCER on ways to improve the efficiency of the current electricity customer transfer process in the NEM.

Relevant to this rule change request are the AEMC's findings and recommendations around improvements in the accuracy of the customer transfer process: [6]

- The AEMC found in its review that there are some aspects of the transfer process that may have inaccuracies; specifically data that is used for a customer transfer, and customer transfers that are performed in error.
- Accuracy of the customer transfer process could be improved both in terms of the data that is used, and also in the process itself.
    - Most commonly a mismatch occurs between the address data that exists in MSATS for each electricity consumption point, and the commonly used address of the customer's premises that is provided by the customer to the winning retailer.
    - Stakeholder submissions to the AEMC's Review also noted issues existing with the data used in the customer transfer process.
    - There are also instances where the wrong customer is transferred (i.e. erroneous transfers).
- These inaccuracies have the potential to negatively impact on the customer's experience with the transfer process. Errors in customer transfers contribute to higher operational costs for retailers, and handling of complaints cases that must be resolved with energy ombudsmen.[7]
- The AEMC considers that it only takes unsatisfactory experiences for a few customers to be made known more widely to undermine confidence in the retail market.[8]

4. Nature and scope of the issues the proposed rule will address and how it would address the issues

Accurate data and information has the potential to positively impact on the customer's experience with the transfer process, through the potential for an overall lower level of error in the process. Fewer errors in the transfer process, and clear obligations to resolve errors, would increase customer confidence in switching retailers and contribute to lower

[6] AEMC, *Final Report: Review of Electricity Customer Switching* (10 April 2014), 24-26, 47-50, 59-63.
[7] AEMC, *Final Report: Review of Electricity Customer Switching* (10 April 2014), 27.
[8] AEMC, *Final Report: Review of Electricity Customer Switching* (10 April 2014), 46.

operational costs for retailers, including through fewer complaints cases that must be resolved with energy ombudsmen.

4.1 Inaccurate NMI Standing Data

The current rules and procedures, and guidelines made under them, provide clear guidance and standards on the maintenance of accurate metering data and information. Various obligations are placed on registered participants to encourage them to meet certain performance standards with regard to the collection and processing of information.

For example, the MSATS Procedures currently require:

- All new and existing standing data in MSATS to be kept current and relevant;[9] and
- That the relevant participant must update the NMI Standing Data in MSATS within 20 business days of becoming aware that the data is no longer current or relevant. [10]

Further, AEMO has developed a number of procedures and guidelines for entering data into MSATS. For example, "Standing Data for MSATS" details the data requirements for the various data elements that comprise NMI Standing Data, together with relevant examples and definitions. It also specifies what party is required to source the data.

Based on these existing requirements, many parties that supply NMI Standing Data to MSATS (largely Local Network Service Providers (LNSP)) already have business processes in place to achieve a high level of data accuracy.

However, in spite of these existing requirements and processes, numerous submissions to the AEMC's Review commented on situations in which data inaccuracies have arisen.

The AEMC outlines in its Review that the main cause of errors in the switching process relate to the address information associated with NMIs. That is:[11]

- The local government's property description (i.e. the address that the customer associates with the premises) does not always align with the NMI Standing Data, or the data in either the retailer's or metering data provider's system. This can result in the wrong property being transferred.
- Greenfield sites are assigned a NMI and initial address. However, these sites are often re-addressed by builders or local governments following development, with these new addresses not being updated in MSATS.
- The NMI in MSATS does not match the details at the customer's supply address, because the data has not been updated in MSATS, or the address was assigned the wrong NMI.
- In order to make a correction to the supply address in MSATS, the LNSP requires the financially responsible market participant to supply a local government rates notice.

[9] MSATS Procedures: CATS Procedure Principles and Obligations (1 July 2014), cl 2.2(i).
[10] MSATS Procedures: CATS Procedure Principles and Obligations (1 July 2014), cl 2.2(j).
[11] AEMC, *Final Report: Review of Electricity Customer Switching* (10 April 2014), 26.

Where the customer resides at a rental property, this may be difficult to procure since it requires the cooperation of the property owner or their agent.

The customer may not always have ready access to the NMI itself, which places increased reliance on the accuracy of the address that is provided to the retailer as part of the transfer. Therefore, inaccuracies with this field can create problems in transfers.

Such inaccurate data extends the time taken for the transfer process to complete. If an objection is raised (e.g. due to inaccurate data being used, as discussed above), then the transfer impediment must be identified and mutually resolved, potentially lengthening the time for a transfer to successfully complete.

4.2 Erroneous transfers

Erroneous transfers can occur (e.g. where the customer is transferred to another retailer without the customer's consent). This typically occurs when a retailer raises the transfer request in MSATS, with the retailer entering the incorrect NMI due to:

- The customer quoting the NMI incorrectly to the retailer; or
- Error by the retailer when entering the NMI in MSATS.

Under the current arrangements, an erroneous transfer is unlikely to be identified until it has occurred. A customer may identify they have been wrongly transferred when they receive a new customer welcome pack, or first electricity bill, from a new (unfamiliar) retailer.

A key issue is that an erroneous transfer cannot be resolved without considerable input from the wrongly transferred customer. That is, the customer may be required to coordinate communications between the two affected retailers, and effectively undertake the planning for a reversing in-situ customer transfer request. Retailers may not always have an incentive to take responsibility to promptly resolve an erroneous transfer.

Erroneous transfers increase time and resource costs for retailers, customers, energy ombudsmen and potentially metering data providers, who must allocate time and resources towards reversing the erroneous transfer.

4.3 Customer Impacts from inaccurate transfers

There are a number of potential negative impacts for customers, and retailers, from inaccurate transfers including:

- Account disruption: for example, the resulting disruption to the erroneously transferred customer's existing payment arrangements may cause them to fall into arrears.
- Effects upon a third party: where there is a transfer error, the incorrectly transferred NMI will likely affect another customer. That is, there is a customer who thought they had been transferred to a new retailer, but have not been transferred, since someone else is transferred instead.

- Customer service centre impact: where there is a transfer error, customers can be confused about which energy retailer should be billing them for electricity consumption at their property, so they contact their retailer or an energy ombudsman for clarification, creating administrative costs.
- Costs to retailers and customers: where complaints relating to inaccurate transfers are escalated to energy ombudsmen, ombudsmen officers spend time resolving these requests. Ombudsmen schemes are funded by retailers, who may pass on such costs to customers.

Erroneous transfers comprise around three per cent of total transfers that are given effect through the MSATS system annually. While they comprise a relatively small proportion of total transfers, this proportion has been relatively constant over time (i.e. it has not improved).

Inaccurate transfers, while comprising a small portion of total transfers, can have significant impacts on customers, and create costs for retailers, metering data providers, and energy ombudsmen.

When transfers do not occur in an accurate manner, this has the potential to add time to the transfer process, since retailers have to spend more time and effort finding the correct data and information for the customer who wishes to transfer. Further, one customer's bad experience, through negative word of mouth and media reporting, can disenchant a broader customer population over time.

5. Other policy reforms

The rule changes to improve the accuracy of electricity customer switching in the NEM are complimentary to, and fit within, the broader COAG Energy Market Reform agenda. Other energy market reforms related to this rule change proposal include:

- **Improving the timing of the electricity customer transfer process** rule change request submitted at the same time as this request.
- **Enhancing competition in metering and related services:** The AEMC is considering a rule change request that would support market-led investments in advanced meters. http://www.scer.gov.au/workstreams/energy-market-reform/demand-side-participation/smart-meters/metering-services/.
- **The 2014 Retail Competition Review** considered the state of competition in the small customer electricity and natural gas markets and the possible future development of competition. Available at: http://www.aemc.gov.au/Markets-Reviews-Advice/2014-Retail-Competition-Review.
- **The Distribution Network Pricing Arrangements** rule change request is considering how the principles used to set prices for distributors should be adjusted to encourage distributors to set and structure network prices that better reflect the cost of providing

network services. This would encourage customers to change consumption in accordance with these price signals. Available at: http://www.aemc.gov.au/Rule-Changes/Distribution-Network-Pricing-Arrangements.

As well as the above reports, when developing the policy analysis and advice as part of its Review, the AEMC took into consideration the outcomes of other projects it was undertaking at the time including:

- **The Review of Competition in the Retail Electricity and Natural Gas Markets in New South Wales (NSW),** in which the AEMC assessed competition in the retail markets for electricity and natural gas in NSW for the purpose of retaining, removing or reintroducing retail price regulation. Available at: http://www.aemc.gov.au/Markets-Reviews-Advice/Review-of-Competition-in-the-Retail-Electricity-an
- **Review of a Framework for Open Access and Communication Standards**, which provided advice to the Energy Council on open access and common communication standards to support contestability in demand side participation and end-user services enabled by smart meters. Available at: http://www.aemc.gov.au/Markets-Reviews-Advice/Framework-for-open-access-and-communication-standa

6. How the proposed rule will or is likely to contribute to the achievement of the National Energy Retail Objective (NERO) and the National Electricity Objective (NEO)

6.1 National Electricity Objective

The NEO states that:[12]

- *"The objective of this Law is to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to-*
  (a) price, quality, safety, reliability and security of supply of electricity; and
  (b) the reliability, safety and security of the national electricity system."

Switching is the most powerful tool customers have available for exerting their influence on the competitive process. The rules and procedures for customer transfers should therefore maximise the opportunity, incentive and ability for customers to switch retailers. Improvements to the accuracy of the customer transfer process assists to improve the capacity and the confidence of customers to participate in the switching process. More accurate transfers facilitate positive customer experiences, meaning that customers are more likely to continue to engage and actively participate with the retail markets in the long term. Accurate and efficient customer transfers are consistent with the promotion of greater customer choice in retail energy market engagements.

[12] NEL, s 7.

To ensure the efficient operation of the electricity system, it is important that obligations on participants in the transfer process are clear and enforceable. Placing obligations on retailers to resolve erroneous transfers will provide customers with a clearer sense of who is responsible for resolving their concerns related to erroneous transfers. This should assist to promote transparency and confidence in retail markets. It will also encourage retailers to improve the quality of service and it will provide consumers with the confidence to engage in switching processes more readily.

6.2 National Energy Retail Objective[13]

The NERO states that:

"*The objective of this Law is to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy*."

The changes to the NERR proposed as part of this rule change request will contribute to the achievement of the NERO by allowing for more efficient operation of the electricity market for the benefit of consumers. Where consumers are able to engage in an easy and timely customer transfer process, they are likely to be more willing to switch retailers in order to select the retail product that most closely reflects their needs and perception of good value. It also reduces the time and energy that customers incur in making and resolving complaints about the transfers that do occur and it is likely to reduce the administrative costs of retailers by reducing the time that it takes for retailers to respond to, and deal with, such matters as increasing the efficient operation of electricity switching for the long term interests of consumers.

The introduction of an address standard, for example, would deliver enduring benefits to customers, since it would improve the accuracy of the customer transfer process and minimise the likelihood of transfer requests being delayed by objections.

7. Australian Energy Market Operator's Declared Network functions

This proposed rule change will not affect AEMO's declared network functions.

8. Expected costs, benefits and impacts of the proposed rule

8.1. Benefits

8.1.1 Address standard

The AEMC's Review noted that the introduction of an address standard would deliver enduring benefits to customers since it would improve the accuracy of the customer transfer process and minimise the likelihood of transfer requests being delayed by objections.[14] This is

[13] NERL, s 13.
[14] AEMC, *Final Report: Review of Electricity Customer Switching* (10 April 2014), 49.

on the basis that errors in address information are the main cause of errors in the customer transfer process.

8.1.2 Erroneous transfers

Customers would have a clearer sense of who is responsible for resolving their concerns related to erroneous customer transfers. This promotes transparency in the retail market.

Customers would have reassurance that, where erroneous transfers do arise, they will be dealt with in a timely manner thereby minimising any negative experiences and promoting confidence in retail markets.

Ombudsmen would potentially benefit, since it will be clear which retailer is responsible for resolving an erroneous transfer, potentially minimising the number of transfer-related complaints received.

Erroneous transfers would likely be resolved faster, and more efficiently, and so the time and effort that customers would normally spend on resolving these issues would be reduced. This reduces transaction costs.

8.2 Costs

8.2.1 Address standard

The costs associated with the address standard would be largely one-off costs, including the following:

- Costs associated with AEMO developing the address standard.
- Costs associated with training market participant staff to input addresses consistently with the new standard.

8.2.2 Erroneous transfers

The implementation costs associated with resolving erroneous transfers would include:

- Costs associated with implementing the rule change.
- Training of retailers' call-centre staff to be made aware of their obligations.
- To the extent that any retailers are not resolving erroneous transfers already, there may be additional on-going costs, since they would likely have to spend more time handling incoming customer queries and resolving erroneous transfers in order to comply with the obligation.

9. Stakeholder consultation

This rule change request was developed by Commonwealth, state and territory officials and approved by the COAG Energy Council. AEMO and the AEMC were consulted as part of the development of this proposal.

The AEMC's Customer Switching Review forms the basis of the arguments put forward in this proposal. As part of its Review, the AEMC undertook various rounds of consultation. That is, the AEMC published an Issues Paper for the Review on 3 December 2013 seeking stakeholders' initial views on the causes and materiality of issues in the current customer transfer process. The AEMC received submissions from 20 stakeholders including retailers, distributors, energy industry associations, jurisdictional energy ombudsmen and consumer groups.

On 23 January 2014, the AEMC published an Options Paper for consultation that built on the material issues that were identified in, and in response to, the Issues Paper. A number of possible options were set out to improve the effectiveness and efficiency of the customer transfer process, along with further questions for stakeholder comment. The AEMC received submissions from 24 stakeholders including retailers, distributors, energy industry associations, jurisdictional energy ombudsmen, consumer groups and industry bodies.

The AEMC also met with a number of key stakeholders (including retailers, metering data providers, energy ombudsmen and consumer groups) throughout the development of the review to discuss the customer transfer process.

10. Draft Rules

[Note: the numbering of rules below has been suggested in accordance with current versions of the National Electricity Rules and National Energy Retail Rules and may need to be revised in light of any future amendments.]

National Energy Retail Rules

57B Complaints about erroneous small customer transfers (electricity only)

(1) This rule only applies in relation to electricity.

(2) If a retailer (regardless of whether they are the financially responsible retailer) receives a complaint about an erroneous small customer transfer, that retailer must resolve the complaint.

(3) The retailer must resolve the complaint in accordance with the retailer's standard complaints and dispute resolution procedures, including any time limits applicable under those procedures.

(4) The retailer must inform the customer that the erroneous transfer has been rectified as soon as reasonably possible after it has been rectified but, in any event, within any time limits for the resolution of complaints applicable under the retailer's standard complaints and dispute resolution procedures.

(5) **Application of this rule to standard retail contracts**

This rule applies in relation to standard retail contracts.

(6) **Application of this rule to market retail contracts**

This rule applies in relation to market retail contracts (other than prepayment *meter* market retail contracts).

National Electricity Rules

Chapter 7 Metering

...

7.17 Address standard

(a) *AEMO* must develop and *publish* an *address standard* for use in the *NMI Standing Data* and the Market Settlement and Transfer Solutions system.

(b) The *address standard* must set out, as a minimum, the required content and structure of the street address field in the Market Settlement and Transfer Solutions system.

(c) In developing the Address Standard under this clause, *AEMO* must act in accordance with the *Rules consultation procedures*.

(d) *Registered Participants, Local Network Service Providers, Metering Providers, Metering Data Providers and Retailers* must comply with the *address standard in accordance with the Market Settlement and Transfer Solutions Procedures.*

Chapter 10 Glossary

address standard

The standard approved by *AEMO* setting out the content and structure of addresses required for the Market Settlement and Transfer Solution system and *NMI Standing Data* in accordance with rule 7.17.

Chapter 11 Savings and Transitional Rules

Part ZZJ Improving the Accuracy of the Customer Transfer Process

11.82 Rules consequential on the making of the National Electricity Amendment (Improving the Accuracy of the Customer Transfer Process) Rule 2015

11.82.1 Definitions

For the purposes of this rule 11.82:

Amending Rule means the National Electricity Amendment (Improving the Accuracy of the Customer transfer process) Rule 2015

Commencement Date means the date the Amending Rule commences.

11.82.2 Address Standard

(a) *AEMO* must develop and *publish* an *address standard* in accordance with rule 7.17 within six months of the Commencement Date.

11.82.3 Amendments to the *Market Settlement and Transfer Solutions Procedures* and *Metrology Procedure*

(a) As soon as practicable after the AEMO has published the *address standard*, *AEMO* must:

(i) amend the relevant *Market Settlement and Transfer Solutions Procedures* to:

(A) require compliance with the address standard (including with respect to *NMI Standing Data*) for any new data entered into the Market Settlement and Transfer Solutions system after the commencement of that amendment; and

(B) set out a procedure for bringing existing data into compliance with the address standard; and

(ii) consider whether any consequential amendments to the *Market Settlement and Transfer Solutions Procedures* are necessary as a result of the Amending Rule; and

(iii) consider whether any consequential amendments to the *Metrology Procedure* are necessary as a result of the Amending Rule.

(b) If *AEMO* considers that any such consequential amendments are necessary under paragraph (a), it must develop and *publish* the amendments.

(c) In developing amendments under paragraphs (a) and (b), *AEMO* is not required to act in accordance with the *Rules consultation procedures.*