



meridian



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Submissions  
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**Switch Process Review – Meridian and Powershop submission**

Meridian and Powershop appreciate the opportunity to submit on the above paper.

Appendix A details our responses to specific consultation questions.

Please contact me if you have any questions regarding this submission.

Yours sincerely

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**Appendix A                      Switch process review issues paper – responses to specific consultation questions**

Submitter	Meridian Energy / Powershop
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Question	Response
<i>General questions</i>	
Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	Meridian / Powershop is unsure of the materiality of certain issues, as identified in our responses detailed below. We do not have any firm views at this stage, however, regarding specific items that should be withdrawn from consideration.
Q2 Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.	<ol style="list-style-type: none"> <li>1. Participants can currently reconnect an ICP and are not always sending the NT file. We understand this is being proposed through a Code amendment, however we feel this needs to be addressed as a switch process change as well as under Part 10.</li> <li>2. Wrong switch types being used/backdated TR switches – there are times when a mutual customer has commenced a new contract with a new trader after the commencement date (councils etc). Currently the only way to request this is to ensure the current trader terminates their contract with the mutual customer the day prior to the commencement date. This highlights that the current switch process and/or the wording of the Code is not efficient for these instances. We note that not all traders systems allow for a backdated TR switch request.</li> <li>3. There is nothing in the Code to prevent gaining traders sending an NTMI more than 10 days in the future. This then creates additional and unnecessary work for both participants in the form of completing the withdrawal process and then re-requesting the ICP(s).</li> <li>4. The current wording around withdrawals needs to be redefined to ensure it is clear what each withdrawal code is used for and when it can be rejected (e.g. NWWP being rejected within a 2 month period due to no customer to bill or NWDF being rejected prior to the CS file being received).</li> </ol>

<i>Issue #1 – The actual switch event date is delayed or is not as agreed.</i>	
Q3. How material is this issue?	Meridian / Powershop considers the issue is reasonably material.
Q4. Is this issue getting worse?	Yes.
Q5. Why do you think this issue is occurring?	Participants systems are a lot more automated than they used to be.
<i>Issue #2 – Replacing / modifying metering installations on the trader ICP switch event date is difficult</i>	
Q3. How material is this issue?	Meridian / Powershop considers the issue is reasonably material – it creates more work for all involved parties.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	If the MEP could update the metering information with the correct effective date (subject to issue #1 being resolved) this would provide a better outcome for the customer and the participants with no rework (i.e. NWMI, re-requesting ICP's).
<i>Issue #3 – Gaining traders face difficulties ensuring accurate switch event meter readings.</i>	
Q3. How material is this issue?	Meridian / Powershop considers the issue is reasonably material.
Q4. Is this issue getting worse?	Yes.
Q5. Why do you think this issue is occurring?	With the saturation of AMI meters across the country, and not all participants having access to HH data or midnight reads. The other consideration is that there are two ways to settlement NHH ICP's and this has introduced another layer of complexity/increase in the read replacement process being initiated.

<i>Issue #4 – A trader should not have to issue a switch notification for an ICP with only unmetered load.</i>	
Q3. How material is this issue?	Unsure.
Q4. Is this issue getting worse?	Not to our knowledge
Q5. Why do you think this issue is occurring?	Unsure.
<i>Issue #5 – A gaining trader may face a delay receiving the first AMI meter reading for the ICP it has gained</i>	
Q3. How material is this issue?	Unsure.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	Unsure.
<i>Issue #6 – AMI switch event meter readings are not necessarily midnight meter readings.</i>	
Q3. How material is this issue?	Reasonably material in our view.
Q4. Is this issue getting worse?	Yes.
Q5. Why do you think this issue is occurring?	With the number of traders settling NHH ICP's as HHR, there is a need for the "midnight" read to be used. There is also an issue with receiving "historic" data on a backdated switch.

<i>Issue #7 – Interpreting trader ICP switching as customer or embedded generator switching may be misleading.</i>	
Q3. How material is this issue?	In so far as the operation of the switching process, we do not believe this is a material issue.
Q4. Is this issue getting worse?	Unclear.
Q5. Why do you think this issue is occurring?	Meridian / Powershop recognises there is a need for the Authority to report accurate information on switches. However, we believe the issues identified are separate to matters of how the switch process operates.
<i>Issue #8 – There is no mechanism to identify the sale and transfer or embedded generator accounts between traders.</i>	
Q3. How material is this issue?	Not significant in our view.
Q4. Is this issue getting worse?	We consider more accurate information may be required but we do not believe the issue is getting worse.
Q5. Why do you think this issue is occurring?	Unsure.
<i>Issue #9 – It is unclear whether an acknowledgement of a switch request notification is required</i>	
Q3. How material is this issue?	We do not believe the specific issue identified to be particularly significant.
Q4. Is this issue getting worse?	No – we believe this is more of an opportunity than an issue as such.
Q5. Why do you think this issue is occurring?	There is an opportunity to redefine when and how the AN notification is used and believe this should be explored further.

<i>Issue #10 – Different timeframes for different types of ICP switches add complexity to the ICP switching process.</i>	
Q3. How material is this issue?	Very.
Q4. Is this issue getting worse?	Yes.
Q5. Why do you think this issue is occurring?	The current structure has too many variables which makes it difficult for participants to follow and report on. There is no “breach” report in place to cover all of the varying time frames.
<i>Issue #11 – Switch withdrawals can be delayed because of delayed information from third parties.</i>	
Q3. How material is this issue?	Unclear.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	As traders we are asking for more information in order make decisions around incorrect properties, metering issues etc and these take time due to access, and aligning third parties to complete work. It is not uncommon for a withdrawal to be initiated outside of the 2 month period contemplated in the Code.
<i>Issue #12 – Different timeframes for applying a meter reading to a non half-hour (NHH) ICP switch add complexity to the ICP switching process.</i>	
Q3. How material is this issue?	Unclear.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	Unsure.

<i>Issue #13 – Sometimes switch event meter readings cannot be obtained despite best endeavours.</i>	
Q3. How material is this issue?	Meridian / Powershop considers the issue to be reasonably material.
Q4. Is this issue getting worse?	Yes.
Q5. Why do you think this issue is occurring?	Given the volume of AMI metering in the market, the number of ICP's that are switching without valid readings have risen to the top of exception lists across the industry. It is unclear whether the switch review process will resolve the issue, but it may highlight a wording change in the Code to ensure participants are not in breach of the Code in these instances.
<i>Issue #14 – Preventing losing traders from updating an ICP identifier during a switch can mean the gaining trader is unaware the ICP is electrically disconnected</i>	
Q3. How material is this issue?	Very, given it is a health and safety issue.
Q4. Is this issue getting worse?	Yes.
Q5. Why do you think this issue is occurring?	With the continual encouragement of customers to switch through various campaigns, there are times that a trader is unable to get the status update on to the registry prior to an NT file being received by the registry/RM.
<i>Issue #15 – The Code is ambiguous as to whether a switch event meter reading is required for certain ICPs with a category 3-5 metering installation</i>	
Q3. How material is this issue?	Unsure.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	Unsure.

<i>Issue #16 – The replacement read process is inefficient.</i>	
Q3. How material is this issue?	Very.
Q4. Is this issue getting worse?	Yes.
Q5. Why do you think this issue is occurring?	Now that there is extensive HHR settlement on NHH ICP's there is a need for the entire read replacement part of the Code to be reviewed. Given issue #13, the 4 month timeframe is not sufficient. The disputes process is not clear or fit for purpose and has never been used for this reason. Given issue #5, we are also reliant on third parties providing data within 5 days in order to complete the read replacement process for an AMI ICP as outlined in 11.3 clause 6 subclause 3 and 12 subclause 2B. Not all traders have agreements with MEP's to provide data.
<i>Issue #17 – Delays to a trader being assigned a new ICP may delay installing a metering installation at the ICP and electrically connecting the ICP</i>	
Q3. How material is this issue?	Unsure.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	Unsure.

<i>Issue #18 – The process for switching ICPs between distributors is inefficient</i>	
Q3. How material is this issue?	Meridian / Powershop considers the issue to be reasonably material. As more embedded networks come on line this is becoming more time consuming. The process is very long winded, with the new distributor having to get permission from all the traders, and the fact that some traders wait until they have a UOSA in place can create more than one change of start date for an embedded network, and then advising the EA who then authorise the switch. Also there is no way of knowing that an ICP is in the Distributor Switching process.
Q4. Is this issue getting worse?	Yes, more and more embedded networks are being delayed. Also there are issues around where LE ICPS are involved.
Q5. Why do you think this issue is occurring?	Mostly because of the fact there is no notification showing on the registry that a Distributor switch is in progress/or has occurred and the time frames around the switch.
<i>Issue #19 – The Code prohibits backdating price category codes</i>	
Q3. How material is this issue?	Can be to the customer if this results in a residential price category over a SME.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	Unsure. Potentially this may be a bigger issue in some networks where we haven't in the past or currently don't have a high number of ICPs though.

<i>Issue #20 – The provision of initial metering data to a trader is not always timely</i>	
Q3. How material is this issue?	Unsure. It does create delays in billing, initiating the read replacement process and giving customer visibility of daily data through web portals, however.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	Unsure.
<i>Issue #21 – Meter reading file formats are not standardised</i>	
Q3. How material is this issue?	Unsure.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	Unsure.
<i>Issue #22 – The gaining and losing MEPs cannot use the same MEP event date for an MEP switch</i>	
Q3. How material is this issue?	Unsure.
Q4. Is this issue getting worse?	Unsure.
Q5. Why do you think this issue is occurring?	Unsure.