

Appendix A Format for submissions: Switch process review issues paper

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| Submitter | Simply Energy |
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Please answer the general questions once (Q1 and Q2).

For each individual issue you will be responding to (1 to 22), please answer questions Q3 to Q5. The template below has been started with the first two issues.

| Question | Response |
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| <i>General questions</i> | |

| Question | Response |
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| <p>Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.</p> | <ul style="list-style-type: none"> • Issue No.1 - The actual switch event date is delayed or is not as agreed. There is already a process between parties that iron out these disagreements. In the event of a Move In switch or HHR the losing trader can send a NWDF. On a Transfer switch the losing trader chooses the switch event date. • Issue No.4 – A trader should not have to issue a switch completion notification for an ICP with only unmetered load. This is still a switch between two Traders so I can't see why the switch process should not be followed. The CS file should only have the top ICP record in the file. • Issue No.7 – Interpreting trader ICP switching as customer or embedded generator switching may be misleading. This may cause the Authority to take time to validate but the only outcome I can see from investigating this further would be a larger cost to Traders. If it was required that we need to report every single customer change that may or may not be Market related then there is significant changes to systems that does not justify the changes proposed. • Issue No 13 – Sometimes switch event meter readings cannot be obtained despite best endeavours. If a reading cannot be obtained then a permanent estimate is used. This is a process well defined so I don't see any issue with investigating this issue further. |

| Question | Response |
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| <p>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.</p> | <ul style="list-style-type: none"> • The acknowledgement of a switch request notification for MI switch type code should be changed to may provide an AN file. If the losing trader agrees with the switch date then the AN file is redundant. • Some MEPs detect a switch loss is in progress and cease sending through AMI reads which force the trader into using a switch estimate, if MEP's started to receive the NT file then this may lead to more of these issues which would not be a desired outcome. • Switching CS file on Category 1 or 2 profile HHR should be looked at. This process should be like the HHR Category 3 to 5, and it was until a change a few years back. As a losing trader when you are sending a CS file on an AMI N meter there are no readings to be sent. I believe a number of traders were not able to automate this. |
| <p><i>Issue #3</i></p> | |
| <p>Q3. How material is this issue?</p> | <p>This is very material. A large percentage of the switch ins have estimated reads which has knock on impacts to the switch challenge read process.</p> |
| <p>Q4. Is this issue getting worse?</p> | <p>Yes, there has been no reduction on switch read estimates in the past two years.</p> |
| <p>Q5. Why do you think this issue is occurring?</p> | <p>Either traders don't receive daily reads or they do get them but don't use them for switching.</p> |
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| <p><i>Issue #5</i></p> | |

| Question | Response |
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| Q3. How material is this issue? | This is material, it can be over five days before an AMI read is received from some MEPs. |
| Q4. Is this issue getting worse? | No, but no improvement either. |
| Q5. Why do you think this issue is occurring? | The Code is too relaxed in time for MEP's to provide data, it should be stricter. |
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| <i>Issue #14</i> | |
| Q3. How material is this issue? | This can be an issue although in most cases the end customer tells you if they have no power and it is assumed the losing trader is not up to date in updating the Registry. |
| Q4. Is this issue getting worse? | Status Quo. |
| Q5. Why do you think this issue is occurring? | Delays in receiving confirmation from the contractors who perform these functions, sometimes they are not directly employed by the trader. |
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| <i>Issue #16</i> | |
| Q3. How material is this issue? | This is material, this part of the switching process would be one of the biggest time wasters. |
| Q4. Is this issue getting worse? | Yes if your switching activity increases. |
| Q5. Why do you think this issue is occurring? | There are a number of issues in this section however the one that affects us the most is backdated switches. There is currently no leeway in the rules when this occurs, especially for three or four months old switch event dates. The rules around timing of reads need to be reviewed and probably re-written. |

| Question | Response |
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| <i>Issue #17</i> | |
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| <p>Q3. How material is this issue?</p> <p>Q4. Is this issue getting worse?</p> <p>Q5. Why do you think this issue is occurring?</p> | <p>This is material and can impact your ability to deal with some MEP's.</p> <p>Yes when MEP's change their processes without consulting Traders and how their processes maybe affected.</p> <p>One MEP and maybe others are insisting on ICPs being claimed before they will issue the meter installation request. This means that all distributors must put the ICP to Ready for this to occur, not all distributors do this. However claiming does mean you can put to inactive – connection in progress.</p> |