

13 November 2018

Submissions
Electricity Authority
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SWITCH PROCESS REVIEW

Unison welcomes the opportunity to provide a submission to the Electricity Authority (the Authority) on the *Switch Process Review*. Unison notes that there are a number of issues that the *Switch Process Review* touches on; however, our submission only considers Issue 19.

Issue 19: The Code Prohibits Backdating Price Category Codes

(a) How material is this issue?

The issue of the Code preventing backdating price category codes is material as it results in some consumers being charged too much or not enough as they are on the wrong price category code (for example low user fixed charge regulations have not been applied when the customer is indeed eligible). Distributors are currently prevented by the Code from backdating these price category codes. However, some distributors have chosen to backdate these price category codes (in agreement with retailers) to ensure that the Registry holds the most accurate information. This ultimately results in non-compliance with the Code when Distributors are audited.

(b) Is this issue getting worse?

This issue has been present for a number of years – Unison has previously raised it as a concern in our audits and then requested a Code change with the Authority in September 2015. A growing awareness of historic and/or recurring data integrity issues relating to points of supply and meter installations associated with AMI deployments, combined with improvements in asset and customer information management systems has meant that long-standing issues are coming to light that at times require backdating to provide the most accurate information and redress historical charges.

At the same time, growing use of third party contractors and agents has resulted in greater scope for delay in information updating or inaccuracy. These delays should be reduced as far as possible through standardising processes (e.g. the Authority's Livening and Energisation Guidelines) as well as use of mobile technology to enhance timeliness and accuracy. However, delays will still occur from time to time, and backdating allows accurate information to be provided.

(c) Why do you think this issue is occurring?

There are a number reasons, as indicated above in response to (b). In addition, incorrect information can be entered into the Registry by the retailer or distributor, or incorrect information provided by the customer.

The prohibition of backdating price category codes is not just an issue for switching, but also one of general ICP information management. Unison supports the Authority amending the Code to allow for backdated price category codes, providing that there is agreement by both the Trader and the Distributor. We strongly urge the Authority to progress this Code amendment as a 'quick win' that can be implemented in a short amount of time. We have previously corresponded with the Authority on the suggested Code change wording and would support this being included in the next Code Amendment Omnibus.

Conclusion

For any questions on this submission, please contact Roanna Vining, Senior Regulatory Affairs Advisor by phone (06) 873 9329 or email Roanna.Vining@unison.co.nz.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nathan Strong'.

Nathan Strong
GENERAL MANAGER, BUSINESS ASSURANCE