

## Appendix A Format for submissions: Switch process review issues paper

Submitter	Trustpower Limited
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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
<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.	<b><i>Issue 4 – A Trader should not have to issue a switch completion notification for an ICP with only unmetered load.</i></b> This would incur cost and cause disruption to traders for no perceived benefit. There would not create a better outcome for the customer, and it would require software development to cater for the changes, incurring extra cost for participants. We are unsure which current issues have caused this change to be required.

Question	Response
<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>	<p>In particular, we wish to highlight the need for an amendment to Part 11 of the Code.</p> <p>A well-known industry de facto practice has arisen, whereby gaining traders switching batches of commercial ICPs have been using the move-in (MI) switch type, instead of the transfer (TR) switch type mandated by Schedule 11.3, Clause 2(2)(b) of the Code.</p> <p>This is because the transfer switch type does not allow gaining traders and losing traders to fix a date for the switch. The move-in switch type does allow this, giving certainty to consumers, traders and distributors that contractual obligations will be met and that billing outcomes are accurately reflected.</p> <p>Trustpower submits that the Code be amended to allow traders to fix a switch date whilst using the mandated transfer switch type.</p> <p>We consider that amending the Code to enable a fix date for transfers would correct a well-known issue with the current switch process and thereby promote the efficient operation of the current switch arrangements.</p> <p>Consideration should also be given to acquisition customers arising through take-overs, buyouts and defaults by creating a new switch type (perhaps AQ?) This would ensure visibility for all participants and ensure a smooth transition when dealing with affected customers. This is particularly the case when considering future start read amendments, audit requirements etc. This change would also ensure these ICPs improve statistical data by not falling into the general churn bucket.</p> <p>In reference to <b>Issue #9</b>, it is unclear whether an acknowledgment of a switch request notification is required. We believe ANs should be compulsory for both MIs &amp; TRs (current advisory codes are useful and provide valuable insight). In addition, we believe that a critical customer code should be included for standard switches. This will notify the gaining trader, who can therefore contact the customer if this information differs from what was provided on signup (reducing risk and ensuring accurate data).</p>

Question	Response
<b>Issue #1</b>	<b><i>The actual switch event date is delayed or is not as agreed</i></b>
<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>High</p> <ul style="list-style-type: none"> <li>• Current rules do not allow for an optimal experience. Due to contractual agreements, a set date is required.</li> <li>• Change in metering configuration (prepaid as an example)</li> <li>• Mutual customer may have contractual agreements with both traders.</li> </ul> <p>Yes</p> <p>More contracted customers, commercial as well as residential. Increased activity. Technology changes. Increase in HH submissions due to AMI increases.</p>
<b>Issue #2</b>	<b><i>Replacing/modifying metering installations on the trader ICP switch event date is difficult</i></b>
Q3. How material is this issue?	Medium

Question	Response
<p>Q4. Is this issue getting worse?</p> <p>Q5. Why do you think this issue is occurring?</p>	<p>Potentially due to increase in meter configurations.</p> <p>For the reasons outlined in the consultation paper. However, this is biased in favour of the gaining Trader or MEP. What happens when the following occurs?</p> <ul style="list-style-type: none"> <li>• Wrong ICP switched (metering/configuration now changed)</li> <li>• Date was incorrect</li> <li>• Win-back after meter change</li> </ul>
<b>Issue #3</b>	<b><i>Gaining traders face difficulties ensuring accurate switch event meter readings</i></b>
<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>High</p> <p>Yes</p> <ul style="list-style-type: none"> <li>• More traders are submitting HH</li> <li>• Number of meters</li> <li>• Increase in switches</li> <li>• More HH submissions</li> <li>• Ensuring final estimates are correct for legacy meters</li> </ul>
<b>Issue #4</b>	<b><i>A trader should not have to issue a switch completion notification for an ICP with only unmetered load</i></b>

Question	Response
Q3. How material is this issue?	Low
Q4. Is this issue getting worse?	No
Q5. Why do you think this issue is occurring?	Unmetered switches are managed under the normal metered process and see no need to change this.
<b>Issue #5</b>	<b><i>A gaining trader may face a delay receiving the first AMI meter reading for the ICP it has gained</i></b>
Q3. How material is this issue?	Low
Q4. Is this issue getting worse?	No
Q5. Why do you think this issue is occurring?	Contractual agreements, non-communicating AMI.
<b>Issue #6</b>	<b><i>AMI switch event meter readings are not necessarily midnight meter readings</i></b>

Question	Response
Q3. How material is this issue?	High
Q4. Is this issue getting worse?	Yes
Q5. Why do you think this issue is occurring?	System processes were not designed for handling AMI midnight readings and final dates on matching switching event dates. AMI readings have at least a 2-day delay.
<b>Issue #7</b>	<b><i>Interpreting trader ICP switching as customer or embedded generator switching may be misleading</i></b>
Q3. How material is this issue?	Low
Q4. Is this issue getting worse?	No
Q5. Why do you think this issue is occurring?	No issue; as a trader we can report on this internally.
<b>Issue #8</b>	<b><i>There is no mechanism to identify the sale and transfer of customer or embedded generator accounts between traders</i></b>
Q3. How material is this issue?	High
Q4. Is this issue getting worse?	Yes
Q5. Why do you think this issue is occurring?	More financial risk, which could be undermining the business model for smaller retailers.
<b>Issue #9</b>	<b><i>It is unclear whether an acknowledgment of a switch request notification is required</i></b>

Question	Response
Q3. How material is this issue?	Low
Q4. Is this issue getting worse?	No
Q5. Why do you think this issue is occurring?	Different rules for transfers and move-ins, but is straightforward in the rules.
<b>Issue #10</b>	<b><i>Different timeframes for different types of ICP switches add complexity to the ICP switching process</i></b>
Q3. How material is this issue?	Low to Medium
Q4. Is this issue getting worse?	No
Q5. Why do you think this issue is occurring?	Different rules and timeframes could be aligned.
<b>Issue #11</b>	<b><i>Switch withdrawals can be delayed because of delayed information from third parties</i></b>
Q3. How material is this issue?	Low
Q4. Is this issue getting worse?	No
Q5. Why do you think this issue is occurring?	Data quality
<b>Issue #12</b>	<b><i>Different timeframes for applying a meter reading to a non half-hour (NHH) ICP switch add complexity to the ICP switching process</i></b>

Question	Response
Q3. How material is this issue?	Medium to high
Q4. Is this issue getting worse?	Yes
Q5. Why do you think this issue is occurring?	System processes were not designed for handling AMI midnight readings and final dates on matching switching event dates.
<b>Issue #13</b>	<b><i>Sometimes switch event meter readings cannot be obtained despite best endeavours</i></b>
Q3. How material is this issue?	Medium
Q4. Is this issue getting worse?	No
Q5. Why do you think this issue is occurring?	Fewer customers want to give access for legacy sites and non-communicating meters or de-energised AMI sites.
<b>Issue #14</b>	<b><i>Preventing losing traders from updating an ICP identifier during a switch can mean the gaining trader is unaware the ICP is electrically disconnected</i></b>
Q3. How material is this issue?	Medium
Q4. Is this issue getting worse?	Yes
Q5. Why do you think this issue is occurring?	It is easier to disconnect remotely in bulk.

Question	Response
<b>Issue #15</b>	<b><i>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></b>
<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>High</p> <p>Yes</p> <p>Lack of clarity regarding submissions and meter configuration. Also there is more switching activity.</p>
<b>Issue #16</b>	<b><i>The replacement read process is inefficient</i></b>
<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>High</p> <p>Yes</p> <p>Some traders are not using AMI readings when they get them. HHR submissions traders cannot bill on a reading that is not a midnight reading.</p>
<b>Issue #17</b>	<b><i>Delays to a trader being assigned a new ICP may delay installing a metering installation at the ICP and electrically connecting the ICP</i></b>

Question	Response
Q3. How material is this issue?	Very Low
Q4. Is this issue getting worse?	No
Q5. Why do you think this issue is occurring?	We do not see an issue with this. We would not want metering to be installed on an ICP until the distributor is sure that the network is ready and a trader has accepted responsibility.