

Appendix A Format for submissions: Switch process review issues paper

Submitter	Powerco
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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>	
<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> <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>	
<i>Issue #18 The process for switching ICPs between distributors is inefficient</i>	
<p>Q3. How material is this issue?</p>	<p>Q.3 Powerco agrees that the current process for switching Installation Control Points (ICPs) between Distributors is inefficient and amendments to this process are needed. We feel that the Electricity Authority (the Authority) has accurately captured the current issues in shortcomings 1 to 4.</p>

Question	Response
<p>Q4. Is this issue getting worse?</p> <p>Q5. Why do you think this issue is occurring?</p>	<p>Q.4 Yes, the issue is getting worse, the expansion of embedded networks is making this issue more frequent.</p> <p>Q.5 The process is no longer fit for purpose. We consider the shortcomings highlighted by the Authority are largely occurring due to a lack of transparency in the switching process.</p> <p>Powerco supports a review of the distributor switching process. This review should consider having the process flow through the registry like the current trader switching process.</p>
<i>Issue #19 The Code prohibits backdating price category codes</i>	
<p>Q3. How material is this issue?</p>	<p>Q.3 The prohibition against Distributors backdating price category codes is resulting in outcomes that aren't in the best interest of consumers.</p> <p>We understand if a price category code is backdated for an ICP, the Trader responsible for that ICP faces the risk of being unable to pass on this backdated charge to the customer.</p> <p>However, where the Distributor and Trader agree to backdating a price category code, this risk is removed. In these instances, it makes sense to allow backdating as it is good for the customer.</p>

Question	Response
<p>Q4. Is this issue getting worse?</p> <p>Q5. Why do you think this issue is occurring?</p>	<p>Powerco supports a change to the code that allows backdating of price category codes where the backdating is agreed by both the Distributor and Trader.</p>