

Northpower Submission: Switch Process Review Issues Paper

Submitter	Northpower Limited
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Question	Response
General questions	
<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>	<p><i>No comment as not all issues affect Northpower as a Distributor and Metering Equipment Provider</i></p> <p><i>A trader cannot nominate a new MEP using the same event date that the current MEP has entered meter data into the Registry. This causes delays in the MEP switch process while the trader communicates with the current MEP who has to reverse entries from the Registry to enable the nomination of the new MEP.</i></p> <p><i>The Registry should allow a trader to nominate a new MEP on or after the latest metering event date in the Registry. The new MEP should be allowed to accept a nomination and update their meter data into the Registry with an effective date on or after the latest metering event date in the Registry.</i></p> <p><i>This is related to the same problem outlined in Issue 22 as the losing MEP metering event precludes either a MEP nomination or the gaining MEP updating their meter data into the Registry.</i></p>

Question	Response
Issue #1	
<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><i>No material effect on Northpower as a Distributor unless the switch is backdated for an abnormally long period in the Registry. We have noted a few cases of ICPs with HHR metering where the switch event date in the Registry has been populated up to 3 months late which creates additional complexity in rebilling demand based ICPs.</i></p> <p><i>Retailers are negotiating contracts with the customer being switched which are then backdated to a specific (earlier) date such as the start of the customer's financial year.</i></p>
Issue #14	
<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><i>Although we do not experience a large number of cases of disconnections during the switch process, the few cases we have do cause additional work as the staff rely on the Registry data being correct. If a customer or new retailer says the ICP is disconnected when the Registry has an Active (connected) status then additional questions need to be asked of the customer or new retailer.</i></p> <p><i>Northpower agrees that the customer experience especially is adversely affected and gives a bad impression on industry efficiency.</i></p> <p><i>Not noticeably</i></p> <p><i>Delays in updating the Registry by traders along with the design of the Registry.</i></p>

Question	Response
Issue #17	
<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><i>As a Distributor we find that many of the traders do not use the “Disconnected – New Connection In Progress” status which means the trader cannot nominate the initial MEP or presumably cannot organise for the metering to be in place which delays the livening of the ICP.</i></p> <p><i>Due to changes in the metering relationship between traders and Northpower (as an MEP) recently we have experienced more delays in the livening process for new ICPs. These changes have effectively introduced additional parties into the process which has made co-ordination more difficult.</i></p> <p><i>We believe the issue is occurring due to:</i></p> <ul style="list-style-type: none"> <i>a) Traders not using the “Disconnected – New Connection In Progress” status</i> <i>b) The number of parties now involved in the ICP creation and livening process – Distributor, Trader, MEP, Meter Installer, and Livening Agent.</i> <p><i>All parties need to be co-ordinated and this co-ordination is spread over multiple parties – Distributor, Trader, and MEP.</i></p> <p><i>An efficient and effective method of electronic communication such as the Registry switching file process needs to be implemented to help manage the co-ordination of these multiple parties. This would also facilitate easy reporting and identification of where hold-ups are occurring in the process.</i></p>

Question	Response
Issue #19	
Q3. How material is this issue?	<p><i>This issue has been reported for several years with most Distributors experiencing audit non-compliance due to back-dating price category codes.</i></p> <p><i>We are happy that the Electricity Authority has finally realised that the efficient and customer centric market requires that data such as the price category code needs to be back-dated for a limited period beyond the three day Code requirement.</i></p> <p><i>Northpower would support a Code change that would allow back dating of price category codes for up to 3 months or to the last trader switch date whichever is the shortest period.</i></p>
Q4. Is this issue getting worse?	<p><i>As the roll out of advanced meters occurs with the resulting changes or correction to register content/available hours on mainly controlled registers we seem to be getting more requests to back date price category codes.</i></p>
Q5. Why do you think this issue is occurring?	<p><i>Traders who switch ICPs, usually with a new customer sign in, find that the current customer requirements differ from those of the previous customer (e.g. lower user/normal user price category).</i></p> <p><i>We are also finding cases where the installation of advanced metering has resulted in incorrect register content codes/available hours being entered into the Registry. The drawn out correction process involving the trader, MEP, and Distributor can involve requests to backdate price category codes on the Registry.</i></p>

Question	Response
Issue #22	
Q3. How material is this issue?	<p><i>This issue has been reported for several years and is the cause of a significant number of emails between Traders and Northpower as the losing MEP. It is unfortunate that the Authority has taken 5 years to start consultation on this issue due to the inefficiencies that have been caused in the industry.</i></p> <p><i>Northpower has also experienced problems with the issues with late or non-population of meter data in the Registry by the gaining MEP (6.17 in the consultation document) with the resulting liability under the Code as outlined in 6.22 of the consultation document. This issue has also been the subject of discussion with the Authority several times since the Part 10 go-live.</i></p>
Q4. Is this issue getting worse?	<p><i>In Northpower's case the impact of this issue is reducing as the number of Northpower owned legacy meters now replaced with advanced meters owned by other MEPs is quite significant.</i></p>
Q5. Why do you think this issue is occurring?	<p><i>This issue is occurring due to the design of the Registry to incorporate the 2013 Part 10 changes which only allow one event per day for a Registry event (6.16 in the consultation document).</i></p> <p><i>The result, in addition to inefficiencies and costs, are ICPs that now have incorrect initial metering event dates as the gaining MEP has not been able to update their meter data into the Registry on the actual installation date.</i></p>