Appendix A Format for submissions: Switch process review issues paper

Submitter	Malti Prasad Compliance Manager Flick Energy

Question	Response
General questions	
Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons. 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.	
Issue #1	
Q3. How material is this issue?	This issue is causing operational inefficiencies as manual interference is required to get the event date issue resolved. This also causes customer frustration as we are unable to meet our customer obligations of supplying on an agreed date. This leaves the situation open for win back activity, limiting competition.
Q4. Is this issue getting worse?	Yes, this is getting worse with the increase in switch activities.

Question	Response
Q5. Why do you think this issue is occurring?	The current code does not allow the gaining trader who has contract with the customer to determine the switch event date. There is no visibility to the losing trader who determines the switch event date on customer's expectations.
Issue #2	
Q3. How material is this issue? Q4. Is this issue getting worse? Q5. Why do you think this issue is occurring?	It is essential for all metering/configuration changes to match customer demand and align with switch event dates to avoid negative first customer experience. Yes, with the increase in switch activities and customer demand. The inability for the registry to handle two events on the same date is causing this issue.
Issue #3	

Q3. How material is this issue?	This has a significant negative impact on Flick's operational efficiency as an average of 20% of CS reads received by Flick are rejected due to either CS readings being estimate or actual read from another date being submitted in the CS file. Flick bills customers on the actual read at 00.00 hours gained on the event date. This correctly reflects the start read of the customer but due to other retailers submitting estimate reads in the CS file 20% of the daily CS reads goes through the RR process. This causes operational inefficiency and seems like Flick is being penalised for being accurate. We think that EA should support innovation and accuracy and implement changes through the code to ensure that all CS reads from smart meters are midnight stamped and for the event date.
Q4. Is this issue getting worse?	Yes, this issue is getting worse, as there are no code implications of sending estimate reads.
Q5. Why do you think this issue is occurring?	There are no obligations on sending actual reads in the CS file even if the retailers have access to actual reads through their metering companies. Also there is no obligations under the code for the MEP's to supply actual midnight reads to traders with AMI meters.
Issue #4	
Q3. How material is this issue?	This issue does not impact Flick as we do not retail on unmetered ICPs.

Q4. Is this issue getting worse? Q5. Why do you think this issue is occurring?	
Issue #5	
Q3. How material is this issue?	The delay in AMI meter reads affects the RR process directly. This is due to non-alignment of timeframes between data delivery (10 business days) and the RR process (5 business days). This may lead to consumption being unreconciled to the market or customers being billed on incorrect consumption. Delay in AMI meter reads also causes delays to customers first bill and thus customer has negative first experience.
Q4. Is this issue getting worse?	Yes, with retailers offering more timely billing options (eg. Weekly and potentially real time in the future) the issue will become more prominent. We also see significant operational impacts when unexpected communication issues occur for example the 2Degrees network shutdown which impacted a significant number of meters.
Q5. Why do you think this issue is occurring?	The MEP's also do not provide data/readings for backdated switches in a timely manner The code is inconsistent as the regulatory timeframe between MEP data delivery which is 10 business days and replacement read process which is 5 business days do not align with each other. The RR process is solely dependent on the MEP data delivery.
Issue #6	

Q3. How material is this issue?	This creates inefficiency in the RR process especially where there is significant consumption difference between the midnight read for the event date and the CS actual read which is from anytime of the day. The reads cannot be rejected under the code due to it being an actual read for the event date. As both reads are actual and for the event date, retailers are confused on which read to use as their start read for their customer. This confusion and complication may lead to the consumption difference not being reconciled to the market.
Q4. Is this issue getting worse?	Yes, with more retailers now choosing to send estimate or actual read from anytime of the day in the CS file rather than using the midnight read being available to them.
Q5. Why do you think this issue is occurring?	The retailers are not obligated to use the midnight AMI read for switching events and thus the retailers do not use this even if they do have access to the midnight read. The actual read is not defined as midnight read in the code. The actual read is thus perceived as either being midnight read or an actual read from anytime of the day.
Issue #7	
Q3. How material is this issue? Q4. Is this issue getting worse? Q5. Why do you think this issue is occurring?	Currently this is not an issue with Flick.
Issue #8	

Q3. How material is this issue? Q4. Is this issue getting worse? Q5. Why do you think this issue is occurring?	Currently this is not an issue with Flick.
Issue #9	
Q3. How material is this issue? Q4. Is this issue getting worse? Q5. Why do you think this issue is occurring?	It seems this is an unnecessary step which also hinders the automation of the back office process. There should be other means established through registry to notify gaining retailers if there is a reason which could delay the switch. Also there is inconsistency in the AN requirement and depends on the type of switch being initiated. Yes, this causes confusion and errors in the switching process. The AN requirement is inconsistent and is not mandatory for all switch types.
Issue #10	
Q3. How material is this issue? Q4. Is this issue getting worse? Q5. Why do you think this issue is occurring?	To increase operational efficiency and to avoid code breaches it is essential to align timeframes for all the switch types. Currently the different timeframes set for each switch type adds complexity to back office operations leading to breaches. Yes, this is leading to more breaches as traders are confused on which timeframes are set for each switch types This issue is occurring due to the non-alignment of timeframes for different switch types in the code.

Issue #11	
Q3. How material is this issue?	It is essential for the retailer to know the reason for the notice of withdrawal before making a decision on whether to accept or reject the withdrawal. The current method of email correspondence delays the switch withdrawal process. Flick proposes for a text field to be introduced in registry which could be filled by the retailers detailing the reasons for raising or rejecting the withdrawal.
Q4. Is this issue getting worse?	Yes, with increase in switch activities this issue is getting worse.
Q5. Why do you think this issue is occurring?	The unavailability of free text field in registry limits the efficiency of this process.
Issue #12	
Q3. How material is this issue?	The non-alignment of the meter reading date applied by the gaining and losing retailer causes inaccuracy in reporting the ICP days to the reconciliation manager. There is always a one day discrepancy between the two.
Q4. Is this issue getting worse?	Yes, this is getting worse with the increase in switch activities.
Q5. Why do you think this issue is occurring?	The code is inconsistent in its approach in determining when a NHH switch event meter reading applies.
Issue #13	
Q3. How material is this issue?	Where reads cannot be obtained due to a valid reason such as access issues and customers not co-operating there should be a standard method for determining an average profile for usage at the property.
Q4. Is this issue getting worse?	Yes

Q5. Why do you think this issue is occurring?	The code does not have room for the exceptions where meter reading cannot be received due to a reasonable reason.
Issue #14	
Q3. How material is this issue?	This has an adverse effect on first customer experience as the reconnection process is delayed due to the incorrect status shown in registry. This also leads to gaining retailers breaching the status code if registry is not updated within 5 working days due to delay in switch.
Q4. Is this issue getting worse?	Yes
Q5. Why do you think this issue is occurring?	The inability for registry to allow a status update during a switch process leads to this issue.
Issue #15	
Q3. How material is this issue? Q4. Is this issue getting worse? Q5. Why do you think this issue is occurring?	Flick currently do not retail Category 3 – 5 meters.
Issue #16	

Q3. How material is this issue?	Along with creating complexity in back office operations the inefficiency in the replacement read process disadvantages the customers. Customers should be billed on the consumption accumulated from their event date with their gaining retailer and not for consumption which has accrued with their losing retailer or consumption of other customers. Flick perceives the inefficiency in RR process as obstructing innovation and accuracy. The retailers submitting reads in the CS file from anytime of the day and marking this as an actual read are also contributing to this inefficiency. The current replacement read process adversely affects the accuracy of the market settlement and customer invoicing.
Q4. Is this issue getting worse?	With the increase in use of estimate reads and reads from anytime of the day in the CS file is making this issue worse.
Q5. Why do you think this issue is occurring?	There is inconsistent use of actual readings used in the switching process and this has been promoted by the view of the EA that retailers can use an actual read from any time on the switch date that cannot be disputed through the RR process. For an efficient switching process we believe that the midnight read on the switch event date should always be used and should be the only undisputable switch read.
Issue #17	
Q3. How material is this issue?	It is vital for the retailers to have control over when they can electrically connect the sites as they have an obligation to fulfil their customer's request.
Q4. Is this issue getting worse?	Yes

Q5. Why do you think this issue is occurring?	The timeframe to change from 'New' to ready status is not regulated through the code and thus the networks are not obligated to stick to any time frames.
Issue #18	
Q3. How material is this issue?	The distributor switching process is a manual process and is not transparent through the registry which creates complications for the retailers
Q4. Is this issue getting worse?	Yes, with more distributors entering the market especially the embedded networks this issue is getting worse.
Q5. Why do you think this issue is occurring?	This issue is occurring as the registry does not have provision for switching ICPs between distributors.
Issue #19	
Q3. How material is this issue?	It is essential to provide customers the choice to change/backdate their price category if they feel that they are being disadvantage through their current price code. The unavailability of this choice leaves customers feeling unsatisfied with their retailer.
Q4. Is this issue getting worse?	Yes, as awareness increases amongst customers around low/standard price category, there is an increase in dissatisfaction around the inability to change/backdate price category.
Q5. Why do you think this issue is occurring?	This issue is occurring as there is no provision in the code for the networks to back date price category codes. Networks will breach if they backdate a price cat.
sue #20	

Q3. How material is this issue?	The delay in metering data delays the Read replacement process which disadvantages the customer. This also delays customer billing and results in an adverse customer experience
Q4. Is this issue getting worse?	Yes
Q5. Why do you think this issue is occurring?	Non-alignment of timeframes between the RR process and AMI data request in the code which leads to this issue. There is also no visibility to the MEP on a switch in progress. The MEP's could prepare themselves if they are aware of a switch in progress.
Issue #21	
Q3. How material is this issue?	Non-standardised meter reading file formats hinder innovation and efficient running of the backoffice processes. It is also detrimental to promoting efficiency and competition in the market. Generally, the lack of efficient standardised processes across the industry is a barrier to entry
Q4. Is this issue getting worse?	Yes, with more MEP's entering the electricity market, this issue is getting worse.
Q5. Why do you think this issue is occurring?	Due to Code not being regulated the MEP's are not obligated to use the same file format.
Issue #22	

Q3. How material is this issue?	It is vital for both the losing and gaining MEP to be able to update registry for the same event date so that reconciliation is effected correctly through submission.
Q4. Is this issue getting worse?	Yes, with increase meter change activities.
Q5. Why do you think this issue is occurring?	This issue is occurring due to registry's inability to record two events for the same date.