

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

Submitter	Electric Kiwi
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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
<b>General questions</b>	
Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	None
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>1) We would like to raise the issue around double withdrawals. An example of this is when an ICP switches to us from trader X, and after a few weeks' time, we find that the meter is not communicating. If the MEP decides not to fix the communication issue, we then need to switch the customer to another trader (Y). Occasionally once they choose a new trader, we agree with the customer or the new trader to remove ourselves as a trader for that time period. This results in us having to NW the new switch with trader Y, then get trader X to agree to a withdrawal as well. Eventually, trader Y will send a new NT directly to trader X. This is currently handled through a lot of emails, phone calls, and registry files. An ideal option would be a new type of NW that "removes a time slice", which can be initiated by trader removing themselves or by gaining trader;</p> <p>2) We believe that free text fields in switch files which be a huge benefit to the process. This would remove the need to email other traders and the registry would contain all needed information.</p>
<b>Issue #1: The actual switch event date is delayed or is not as agreed</b>	
Q3. How material is this issue? Q4. Is this Issue getting worse? Q5. Why do you think this Issue is occurring?	This has not presented any major problems for us. However, we would like to note that ideally the solution should not be forcing the losing trader to accept the gaining traders proposed date. This type of solution would then cause similar issues mentioned in the paper, but in the reverse.
<b>Issue #2: Replacing/modifying metering installations on the trader ICP switch event date is difficult</b>	

Q3. How material is this issue?  
Q4. Is this Issue getting worse?  
Q5. Why do you think this Issue is occurring?

We do not face this issue currently as we do not accept ICPs who have an MEP which we do not have a contract with. However, we agree that this is a considerable issue in the switching process and feel it has the potential for limiting competition. With that said, we don't believe the correct solution is to force the losing retailer to accept the gaining retailers proposed date.

Alternative solutions could be:

- 1) MEP to be notified of NT and AN so that they're aware of the status of the switch
- 2) MEP switch timeframes to be shortened
- 3) MEP should be able to provide specific information about the site to aid in meter replacement
- 4) Allowing traders to send NTs up to 20 business days in advance. This would give sufficient time for both losing and gaining traders and MEPs to prepare for a change in the metering installation. This would also require changes in the Code to allow the losing retailer to complete the switch within 5 business days after the greater of the proposed effective date or today, not NT received date

***Issue #3: Gaining traders face difficulties ensuring accurate switch event meter readings***

<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>As a trader who is only permitted to reconcile on HHR data and only accepts switching ICPs with communicating AMI meters, we consider this a major issue within the existing switching process. Upon review of the EDA file between 1/1/2018 and 25/10/2018, 28.1% of reads sent to us from the losing trader in the CS files were estimates. On the contrast, only 1.8% of all CS files we have sent in the same timeframe as the losing trader were estimates.</p> <p>This highlights a huge opportunity for improvement in the processes followed by other traders. When estimates are sent in the CS file, it adds considerable operation load to the gaining trader to validate the CS reads and puts them at risk of being non-compliant if they are unable to send a replacement read within 5 business days. This is especially difficult when the losing trader receives an NTMI for 5 business days in the future and therefore will never have actuals by the time they need to complete the switch.</p> <p>We believe that this issue could be addressed in a number of ways:</p> <ol style="list-style-type: none"> <li>1) MEP required to provide midnight read on switch date to registry, gaining trader, and losing trader within 5 business days of NT received (<b>Preferred</b>)</li> <li>2) Allowing traders up to 10 business days to submit a replacement read</li> <li>3) MEP to provide start read to gaining trader within 5 business days (down from 10)</li> <li>4) If the ICP has a communicating AMI meter, the losing trader must submit an actual midnight read. If actual reads are unavailable, then the AMI Comms Flag must be set to N</li> <li>5) Switch completion deadline to be 5 business days after the greater of the proposed effective date or today, not NT received date</li> </ol>
<p><b><i>Issue #4: A trader should not have to issue a switch completion notification for an ICP with only unmetered load</i></b></p>	
<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We do not accept UML only ICPs. We have no comment on this issue.</p>
<p><b><i>Issue #5: A gaining trader may face a delay receiving the first AMI meter reading for the ICP it has gained</i></b></p>	

<p>Q3. How material is this issue? Q4. Is this Issue getting worse? Q5. Why do you think this Issue is occurring?</p>	<p>This is one of the biggest pain points of the switching process to date. It can create a very negative first impression to the customer, which the trader has no control over. Recent analysis of our data indicates that for 7.5% of switches to ELKI, we do not receive actual AMI reads with 5 business days after the switch completion.</p> <p>We believe the simplest and most immediate solution to this issue is extending the timeframe in Part 11 Schedule 11.3 Clauses 6(3) and 12(2B) from 5 business days to 10 business days. This would align with the current 10 business days the MEP has to send the read to the trader. Ideally, the MEP would be required to send reads to the gaining trader within 5 business days instead of 10. As mentioned in the response to issue 3, we believe the preferred solution in which an MEP is responsible for providing the switch read is the best solution for the industry.</p>
<p><b><i>Issue #6: AMI switch event meter readings are not necessarily midnight meter readings</i></b></p>	
<p>Q3. How material is this issue? Q4. Is this Issue getting worse? Q5. Why do you think this Issue is occurring?</p>	<p>When a losing trader does not provide a midnight read for a communicating AMI meter and refuses to accept a replacement read, it puts the gaining trader in breach situation which they have no control over. If the ICP has an AMI meter, reads should be actual midnight reads and both traders should use them.</p> <p>However, as mentioned in other issues, the ideal solution to this issue is that the MEP provides the switch read to the registry, and both the gaining and losing traders.</p>
<p><b><i>Issue #7: Interpreting trader ICP switching as customer or embedded generator switching may be misleading</i></b></p>	
<p>Q3. How material is this issue? Q4. Is this Issue getting worse? Q5. Why do you think this Issue is occurring?</p>	<p>We agree that this is an issue, and it would be beneficial to the industry to understand ICP transfers versus customer transfers. We would prefer that any changes required to produce this are simple and easy to integrate into participants' systems. One solution could be the use of a new switch type.</p>
<p><b><i>Issue #8: There is no mechanism to identify the sale and transfer of customer or embedded generator accounts between traders</i></b></p>	
<p>Q3. How material is this issue? Q4. Is this Issue getting worse? Q5. Why do you think this Issue is occurring?</p>	<p>We agree that this is an issue, and it would be ideal to address it. As mentioned in Issue #7 above, we would prefer that any changes required to fix this are simple and easy to integrate into participants' systems. One solution could be the use of a new switch type.</p>
<p><b><i>Issue #9: It is unclear whether an acknowledgment of a switch request notification is required</i></b></p>	

<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We don't consider this to be a major switching issue, however, we believe the AN files are quite beneficial to the process. They indicate that the switch is being processed and provides background in to the status of the ICP (through the AN code). To simplify the process, the ideal solution is to always require an AN within the same timeframe despite which type of NT has been sent.</p> <p>We find sending ANs to be useful as some other traders send NTTRs today with yesterday's date requested, or an NT 10 days in advance, and we always respond with an AN with the proposed effect date equal to today. Without the AN for NTTRs, we would be unable to propose a new date. We do agree that there might be a need to send multiple AN codes in the response, however, an alternative is to have some new AN codes which could encompass a variety of current codes (i.e. Occupied Disconnected, instead of OC, PD - we could use 'OD').</p>
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***Issue #10: Different timeframes for different types of ICP switches add complexity to the ICP switching process***

<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We agree that this adds complexity and confusion to the switching process. The ideal solution is that timeframes are standardized for the different switch types.</p>
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***Issue #11: Switch withdrawals can be delayed because of delayed information from third parties***

<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>There are many reasons a switch withdrawal may need to be done after 2 months' time. An example we come across occasionally is a customer providing incorrect address details which results in us switching over a wrong property. Many times, we have the property for months before we find out that it's incorrect, and usually we only find out due to metering issues which require a site visit.</p> <p>As we have no customer at the wrong property, we attempt to withdraw the ICP back to the previous trader, but they reject the NW due to it being longer than two months since the switch completed. In at least one of these cases, we were unable to read or disconnect the property for over 6 months because there was no known customer. A switch withdrawal should be allowed up to the last revision period. As long as it can still be reconciled on and both parties agree, we do not see any issue with a withdrawal after two months.</p>
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***Issue #12: Different timeframes for applying a meter reading to a NHH ICP switch add complexity to the ICP switching process***

<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We do not currently reconcile NHH, but we support any move to ensure consistency between meter reads and reduce UFE or incorrect ICP days in reconciliation.</p>
<p><b><i>Issue #13: Sometimes switch event meter readings cannot be obtained despite best endeavours</i></b></p>	
<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We agree that this an issue, especially the rare instances noted in section 4.80 of the issues paper. A solution to this issue could be that the EA include a clause or guidelines about what constitutes "best endeavours". As an alternative, a good solution would be that this becomes the responsibility of the MEP who's meter was onsite, if it was a communicating AMI meter.</p>
<p><b><i>Issue #14: 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></p>	
<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We consider this a significant pain point in the current switching process, and prevents the losing trader from being able to provide the gaining trader valuable information on the ICP. As mentioned in the switching paper, this issue has the ability to create a very negative first experience for the customer.</p> <p>The ideal solution is to allow losing traders should be allowed to update the registry. A second preferred solution would be to allow traders to update the registry with the disconnected status as soon as the disconnection is complete, which would include being able to select a future date (tomorrow) as the date the ICP becomes Inactive. Currently we need to wait till day after the disconnection for this update to be done so that it is not future dated.</p>
<p><b><i>Issue #15: 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>	
<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We do not supply category 3-5 metering installations and do not have a comment on this issue.</p>
<p><b><i>Issue #16: The replacement read process is inefficient</i></b></p>	

<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We very much agree that this major inefficiency in the current switching process. It adds significant operational overhead to both the gaining and losing trader for what can be very insignificant amounts of energy (as little as 1 kWh). As of 25 October, we had sent over 9,000 RRs so far this year, which gives an indication of the level of operational burden created. Over 28% of all CS files we have received this year have been estimated reads. As a trader who only accepts communicating AMI meters, we find this to be unnecessarily high and many times puts us at risk of non-compliance when we may not have control over getting a timely read for the MEP in order to send a replacement read.</p> <p>We have a number of proposed solutions to this issue, some of which have also been mentioned as solutions to other issues:</p> <ol style="list-style-type: none"> <li>1) MEP required to provide midnight read on switch date to registry, gaining trader, and losing trader within 5 business days of NT received (Preferred)</li> <li>2) Allowing traders up to 10 business days to submit a replacement read</li> <li>3) MEP to provide start read to gaining trader within 5 business days (down from 10)</li> <li>4) If the ICP has a communicating AMI meter, the losing trader must submit an actual midnight read. If actual reads are unavailable, then the AMI Comms Flag must be set to N</li> <li>5) Establish a threshold for the minimum kWh difference between the CS read and the gaining traders start read (such as 10 kWh). If the difference is less than this amount, then an RR is not required</li> <li>6) The losing trader should be able to initiate replacement reads</li> <li>7) Allowing an RR up to the last revision period as long as both parties agree and is correctly reconciled</li> </ol>
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***Issue #17: Delays to a trader being assigned a new ICP may delay installing a metering installation at the ICP and electrically connecting the ICP***

<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We do not handle new connections and have no comment on this issue.</p>
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***Issue #18: The process for switching ICPs between distributors is inefficient***

<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We consider this to be a minor issue with little impact on us at this point in time. However, as there is expected to be more embedded network in the future, we feel that switching between distributors should be a process that includes notifying the trader through the registry. This will allow the trader a simple and efficient way to accept or reject, and can accurately be recorded for audit purposes.</p>
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***Issue #19: The Code prohibits backdating price category codes***

<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We believe the biggest issue with the inability to backdate price category codes is the impact on the customer. As noted in the issues paper, a customer may be with a trader for several months before it is identified that they should have been a low user. Being able to backdate a price category code will have great benefits the customer and provide a much better experience. As long as the distributor and the trader agree, we see no issue with backdating price category codes up to 4 months.</p>
<p><b><i>Issue #20: The provision of initial metering data to a trader is not always timely</i></b></p>	
<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>This issue highlights an inconsistency in the processes that the trader and the MEP need to follow in order to be compliant with the code. While the MEP has up to 10 business days to provide a start read, the trader only has 5 business days to send a replacement read. Based on previous analysis, this puts us in a potential breach situation about 7.5% of the time. This is the percentage of switches where we do not have actual reads from the MEP within 5 business days.</p> <p>We can see a few solutions to this issue:</p> <ol style="list-style-type: none"> <li>1) MEP to be notified of NTs and ANs, not only CSs. This will help them prepare their systems for a change in trader.</li> <li>2) MEP to provide start read to gaining trader within 5 business days, not 10</li> </ol>
<p><b><i>Issue #21: Meter reading file formats are not standardised</i></b></p>	
<p>Q3. How material is this issue?  Q4. Is this Issue getting worse?  Q5. Why do you think this Issue is occurring?</p>	<p>We believe that formats should be standardized by default, however, it can be up to the trader and the MEP to negotiate an alternative if they both agree to it.</p>
<p><b><i>Issue #22: The gaining and losing MEPs cannot use the same MEP event date for an MEP switch</i></b></p>	

Q3. How material is this issue?  
Q4. Is this Issue getting worse?  
Q5. Why do you think this Issue is occurring?

We believe this is an overall issue in the registry, and that there should be the ability for the MEPs to use the same event date. When they do not use the same date, our consumption records do not align with the registry. For example, if a meter is changes on 1 November by MEP X, and they removed MEP Y's meter, then we would have usage for each meter on the same day. Currently, only MEP X would by the correct MEP in the registry, and this would not align with our system. Our preference is that a timestamp would also be included if the same event date is being used, and that this timestamp would align with a half hourly interval.

We also think it would be best that the MEPs consistently use the removal date in the registry instead of solely relying on providing paperwork back to the trader (which causes considerable manual operational work).