



17th December 2019

Submissions
Electricity Authority
P O Box 10041
Wellington 6143

By email: submissions@ea.govt.nz

Re: Consultation Paper – Switch Process Review

Flick welcomes the authority's initiatives to streamline the switching processes. We believe that this will minimise operational inefficiencies, reduce transactions costs and enable customer benefits.

We have provided our comments on the 29 issues in the attached appendix.

Yours sincerely,

A handwritten signature in blue ink that reads "M Prasad".

Malti Prasad
Compliance Manager
Flick Energy

Question	Response
General comments	
Q1. Which, if any, of the 29 issues raised in this paper do you consider should not be investigated further? Please give reasons.	Issues 6 and 7. Both of these issues are going to cause operational inefficiencies and take up resources which could otherwise be used to improve services to customers.
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.	The current switching process does not allow trader events to be backdated without being non-compliant. The traders should be allowed time to correct records in registry after they have gained an ICP eg. updating ANZSIC codes.
Q3. Do you consider the ICP switching processes set out in the Code, together with the amendments discussed in this paper, are likely to remain fit for purpose over the next 10 years? Please give reasons.	No With the rapid growth of the industry and innovation it is unlikely to be fit for the purpose over the next 10 years. The amendments discussed in this paper does not solve the issue of exchanging metering data. The registry also does not have the capability of handling multiple traders and multiple trading events which could be required in the future.
Q4. Should any alternative ICP switching processes be considered in the longer term? Please give reasons and outline an alternative.	In the longer term the authority should look at introducing multiple trading events and multiple switching events, allowing multiple retailers to trade through a single ICP eg. one retailer could provide unmetered load services while the other could provide electricity to the house, or one retailer could buy generated electricity from the solar while the other retailer could supply the premise with electricity. The authority should also look at creating a centralise meter data system where all retailers could get their reads from one source. This will resolve all issues involved with the RR process and improve UFE. It will also standardise metering data formats received by retailers increasing efficiency and reducing barriers to cost efficient market entry.

Question	Response
Q5. Should the registry be modified to enable event maintenance to be conveyed via an API? Please give reasons.	Yes, this will simplify processes.
Issue #1 Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	This issue is causing operational inefficiencies as manual interference is required to get the switch 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, which the electricity authority has identified as limiting competition.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 2 - 1 Option 1 - 2
Q4. Are there any advantages or disadvantages that are not included for each option?	Option 1 Disadvantage - There will be a significant increase in switch withdrawals after the switch has been completed which would cause customer frustration and operational inefficiencies. The causes of switch withdrawals could be: <ul style="list-style-type: none"> - MI Switch requested for a property currently being billed (Wrong Switch Type) - Wrong properties being switched - Date failures (the request of the gaining customer overlaps the date of current customers billing date. Currently the losing retailer has visibility of the switch requested and is able to action a withdrawal due to any of the above circumstances before the switch is completed. There is no customer impact through this process.
Q5. Are there any foreseen implementation issues?	Significant system overhaul to implement option 1 which could be very costly and time consuming for us.

Question	Response
Q6. Can you give an indication of cost and benefit?	The cost will outweigh the benefits as there will be an increase in customer dissatisfaction and operational inefficiencies through option 1.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked?. Please give reasons.	Option 2 could be fast tracked as this would only require code change and some system changes compared to other options.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons.	None
Issue #2 Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	It is essential for all metering/configuration change to match customer demand and align with switch event dates to avoid negative first customer experience.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1 – 1 Option 3 - 2 Option 2 - 3
Q4. Are there any advantages or disadvantages that are not included for each option?	The disadvantage of option 2 of letting the gaining retailer complete the switch will cause customer dissatisfaction and operational inefficiencies if incorrect properties are switched through this process. This will require withdrawals after the switch has been completed to reinstate customers
Q5. Are there any foreseen implementation issues?	Significant system overhaul to implement option 2 which could be very costly and time consuming.
Q6. Can you give an indication of cost and benefit?	The cost will outweigh the benefits for option 2 as there will be an increase in customer dissatisfaction and operational inefficiencies through this option.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 1 could be fast tracked as this would only require code change and some minor system changes.

Question	Response
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons.	None
Issue# 3 Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. 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.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 3 – 1 Option 1 – 2 Option 2 – 3 Option 4 – 4 Option 5 – 5 Option 6 – 6
Q4. Are there any advantages or disadvantages that are not included for each option?	No
Q5. Are there any foreseen implementation issues?	No
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 3 should be fast tracked as this option will resolve most of the issues related to the RR process and UFE.

Question	Response
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons.	None
Issue #4 Q1. 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.
Q2. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q3. Are there any advantages or disadvantages that are not included for each option?	None
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Customer and operational benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A

Question	Response
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons.	N/A
Q10. Are there any foreseen implementation issues?	N/A
Issue #5 Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	This issue 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. This can also have a significant impact on customer experience as they may be billed more (or less) than their actual consumption. This is becoming more visible to consumers with smart metering and transparent approaches to retail.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1 - 1 Option 4 - 2 Option 3 - 3 Option 2 - 4 Option 5 - 5
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None

Question	Response
Q6. Can you give an indication of cost and benefit?	Customer and operational benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 1 should be fast tracked as this would resolve most of the issues related to the issue of inconsistent reads in the CS file.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None
Issue #6	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	This is issue is not material to retailers as it does not impact retailer operations.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	None
Q4. Are there any advantages or disadvantages that are not included for each option?	Both options are going to cause operational inefficiencies to the retailers and take up resources which could otherwise be used to improve other essential operational services.
Q5. Are there any foreseen implementation issues?	This will cause operational inefficiencies and add unnecessary operational costs to the industry.

Question	Response
Q6. Can you give an indication of cost and benefit?	The cost will outweigh the operational and customer benefits if any.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	None
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None
Issue #7	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	This is issue is not material to retailers as it does not impact retailer operations.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	None
Q4. Are there any advantages or disadvantages that are not included for each option?	Both options are going to cause operational inefficiencies to the retailers and take up resources which could otherwise be used to improve other essential operational services.
Q5. Are there any foreseen implementation issues?	This will cause operational inefficiencies and add unnecessary operational costs to the industry.
Q6. Can you give an indication of cost and benefit?	The cost will outweigh the operational and customer benefits if any.

Question	Response
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	None
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons.	None
Issue #8	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	The difference in AN requirement for different switch types causes confusion and operational inefficiencies. This also hinders automation of the switching process. It is necessary to align the AN requirement as this is the main mechanism through which retailers notify reasons for delay in switch.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 3 - 1 Option 2 - 2 Option 1 - 3 Option 4 - 4 Option 5 - 5
Q4. Are there any advantages or disadvantages that are not included for each option?	None

Question	Response
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 3 and option 2 should be fast tracked as these options will resolve most of the shortcomings of the AN issue.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None
Issue #9	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	To increase operational efficiency and to avoid retailer confusion resulting in code breaches it is essential to align timeframes for all the switch types.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q4. Are there any advantages or disadvantages that are not included for each option?	None

Question	Response
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A
Issue #10	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	The current switch withdrawal process causes operational inefficiency due to the limited timeframe set in the code to complete the withdrawal process. Also, the current correspondence method of email exchanges delays the switch withdrawal process.

Question	Response
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 2 – 1 Option 3 – 2 Option 4 - 3 Option 1 - 4 Option 5 – 5 Option 6 – 6
Q4. Are there any advantages or disadvantages that are not included for each option?	Option 1 Disadvantage – There are some switch withdrawals e.g NWWP which are requested more than 2 months after the switch date. Option 1 is not going to resolve this issue. An exception should be made for these as these withdrawals mostly benefits the customer and corrects their billing.
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 2 and 3 as these options will resolve most of the issues relating to switch withdrawals.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	Option 2 which would require only code changes followed by option 3 which would require registry changes.
Issue #11	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	This issue causes operational inefficiency to retailers and increases the number of reads being rejected by retailers (RR process).

Question	Response
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A
Issue #12	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.

Question	Response
Q2. How material is this issue?	This issue is important to be resolved to avoid non-compliances related to not being able to obtain a read.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1 – 1 Option 2 – 2
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	There are no costs associated to these options.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 1 as this would resolve most of the issues related to this issue.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	Option 1 should be fast tracked followed by option 2 as only code change is required to implement this change
Issue #13 Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.

Question	Response
Q2. How material is this issue?	This issue 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.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1 – 1 Option 2 - 2
Q4. Are there any advantages or disadvantages that are not included for each option?	Option 1 Disadvantage – the issue of registry not being updated correctly will still exist as this option does not provide gaining retailers to advise registry of any reconnections done during the ICP in switch.
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	There will be some costs related to system changes.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 1 should be fast-tracked after below amendment is made to this option: <ul style="list-style-type: none"> - Option 1 should be amended to allow the gaining retailer to advise registry of any reconnections completed for an ICP.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A

Question	Response
Issue #14	
Q1. Do you agree with the description of the issue?	Flick currently do not retail Category 3 – 5 meters.
Q2. How material is this issue?	N/A
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	N/A
Q4. Are there any advantages or disadvantages that are not included for each option?	N/A
Q5. Are there any foreseen implementation issues?	N/A
Q6. Can you give an indication of cost and benefit?	N/A
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A

Question	Response
<p>Issue #15</p> <p>Q1. Do you agree with the description of the issue?</p>	<p>Yes, we agree with the description of the issue.</p>
<p>Q2. How material is this issue?</p>	<p>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.</p> <p>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.</p> <p>The current replacement read process also adversely affects the accuracy of the market settlement and customer invoicing.</p>
<p>Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.</p>	<p>Option 3 – 1 Option 4 – 2 Option 5 - 3 Option 2 – 4 Option 7 – 5 Option 1 – 6 Option 7 – 7 Option 8 - 8</p>

Question	Response
<p>Q4. Are there any advantages or disadvantages that are not included for each option?</p>	<p>Option 1 disadvantage - by allowing multiple replacement reads process, it will cause operational issues due to increase in the RR process. This can easily be resolved through Option 3 where multiple RR's will not need to be raised.</p> <p>Option 8 Disadvantage – allowing 10 month timeframe for the RR process could also cause operational issues and inconvenience to customers. To combat this, this should be only be permitted for backdated switches.</p>
<p>Q5. Are there any foreseen implementation issues?</p>	<p>None at the moment.</p>
<p>Q6. Can you give an indication of cost and benefit?</p>	<p>Benefits will outweigh costs overtime.</p>
<p>Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.</p>	<p>Options 3, 4 and 5 should be fast tracked as this will resolve bulk of the RR issues.</p>
<p>Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....</p>	<p>None</p>

Question	Response
Issue #16	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. 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.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q4. Are there any advantages or disadvantages that are not included for each option?	Distributors may decide not to provide written approval to retailers until they consider the ICP ready.
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A

Question	Response
Issue #17	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	By reconnecting and fulfilling the needs of their customers, the gaining retailers breach the code. It is essential for this issue to be resolved to avoid non-compliances to the retailers.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A

Question	Response
Issue #18	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	This issue is important as it causes operational inefficiencies to the retailers.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A

Question	Response
Issue #19	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	It is important to resolve the issue of in-consistency and inaccuracy of the daily consumption reads provided in the CS file as some retailers use this to bill their customers on estimates.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 2 – 1 Option 1 - 2
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 2 should be fast tracked as this will resolve all the issues associated with incorrect average daily consumption.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None

Question	Response
Issue #20	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. 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
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A

Question	Response
Issue #21	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	This issue is vital to be resolved as it could hinder essential services to the customers e.g outage notification.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	No
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A

Question	Response
Issue #22	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	It is important to record the status in registry accurately and use this information for submission. This can only be resolved through enabling registry to record two events for the same date.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1 -1 Option 2 -2
Q4. Are there any advantages or disadvantages that are not included for each option?	Option 1 – Disadvantage – this option still does not resolve the issue of accuracy of submission for the time ICP is active/inactive in registry. This would only be resolved by enabling registry to record two events for the same date.
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	None
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None

Question	Response
Issue #23	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. 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.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 2 – 1 Option 3 – 2 Option 4 – 3 Option 1 – 4
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 2 and 3 should be fast tracked as these will resolve the most issues related to MEPs untimely data submission to retailers.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None

Question	Response
Issue #24	
Q1. Do you agree with the description of the issue? .	Yes, we agree with the description of the issue.
Q2. How material is this issue?	Non-standardised meter reading file formats hinder innovation and efficient running of the back-office 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.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1 – 1 Option 2 -2
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 1 as this will resolve the issues related to non-standardised formats.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None

Question	Response
Issue #25	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. 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.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1 – 1 Option 2 - 2
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	None
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None

Question	Response
Issue #26	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	This issue is very important for us to be resolved as our switching in an ICP is dependent on whether the meter on site is an AMI capable and communication is continuous. We are HHR certified retailer only. Around 5% of our gained ICP's have intermittent comms or no comms at all and needs to be switched back to the other retailers. This causes operational inefficiencies and customer inconvenience and disappointment.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1 - 1 Option 2 - 2
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 1 as this will resolve most of the issues related to above.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None

Question	Response
Issue #27	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	MEP's not updating registry with the meter removal details causes confusion and operational inefficiencies to retailer. The retailers are dependent on paperwork as their only source for the removal details. Registry update will be an efficient way receiving removal details.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1 Option 2
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	Benefits will outweigh costs overtime.
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	Option 1 as this will resolve most of the issues related to meter removal registry updates.
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	None

Question	Response
Issue #28	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	It is essential to get metering details updated in registry in a timely manner to avoid operation inefficiencies caused due to this. In some cases ICPs need to be withdrawn due to meter details not being updated in registry promptly.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	N/A
Q6. Can you give an indication of cost and benefit?	None
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	None
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A

Question	Response
Issue #29	
Q1. Do you agree with the description of the issue?	Yes, we agree with the description of the issue.
Q2. How material is this issue?	It is important to be aware of a meter change in progress during ICP switching to avoid confusion and rework.
Q3. Where there are multiple options, rank your preference for the options starting at 1 for preferred.	Option 1
Q4. Are there any advantages or disadvantages that are not included for each option?	None
Q5. Are there any foreseen implementation issues?	None
Q6. Can you give an indication of cost and benefit?	None
Q7. Which, if any, options for changing the ICP switching processes do you consider should be fast tracked? Please give reasons.	N/A
Q8. Which, if any, options for changing the ICP switching processes do you consider could be implemented using a combination of a fast-tracked option, followed by a more substantial change at a later time. Please give reasons....	N/A