

Summary of submissions – switch process re-engineering – Review of Schedule 11.3

No.	Question	Submitter	Response	Authority response
1a	General comments	EDNZ	EDNZ believes that the consultation has omitted to include MEPs' involvement in the process. The majority of the current switching delays facing the industry, that are creating a far from positive experience for Customers, stem from delayed and/or incorrect MEP data populated on the Registry. Eg Issue 3.1.4 – makes no mention of responsibility also for the MEP to ensure the gaining Trader does not inherit out-of-date registry information.	Noted. The issues being created for traders as a result of inaccurate registry metering records may be a sign of participants breaching the Code. Participants are required under the Electricity Industry (Enforcement) Regulations 2010 to report other participants' breaches of the Code to the Authority. The Authority intends to hold a joint MEP/Retailer workshop to discuss operational issues and alignment of information
1b			A further point that was raised at the workshop was to have an indicator for CSRs, whether a selection of appropriate fields shown or combination of those fields displayed, to definitively label a site as either Mass Market or TOU. The inclusion of such an indicator would complement or even make some of the proposed changes redundant*.	Noted. Business rules and mock up screens have been prepared to show additional summary screen fields and will be consulted on shortly. These fields will indicate the following using business rules: a) AMI communicating meter b) AMI non communicating meter c) Non AMI NHH meter d) C&I TOU meter. Note that participants could also build these business rules into their own back office systems. Amending the registry and requiring MEPs to indicate meters capable of remote communications would entail considerable cost.
2a	General comments	Genesis Energy	We disagree with the Authority's proposal to maintain the status quo around the ICP days report. There is a real issue with this report, as evidenced by recent volume disputes, and there is no real value to be gained by retaining the subsequent scaling in the allocation process.	The following issues were discovered in the ICP days reporting from the registry in relation to the "recent volume disputes" referred to in the Genesis submission: a) inaccurate information provided by participants to the registry b) the registry used inaccurate information to complete ICP days reports, and this inaccurate information was then used in the reconciliation process. Item b) above has been fixed in the registry. Item a) requires participants to populate the registry correctly. ICP days scaling provides a

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2b			We also have significant concerns with the proposal that actual reads need to be supplied for AMI meter switches. This will be costly and it will be difficult for participants to comply within the switch timeframes. It will require considerable cost and complexity to alter participant's and agent's systems to achieve this proposed change.	commercial incentive for them to do so. The Authority will reconsider the role of ICP days scaling as part of a future project to review the reconciliation manager's processes under Part 15 of the Code in light of the increasing utilisation of AMI data. Noted. The Authority will not proceed with this proposal at this time.
3a	General comments	Meridian Energy	Meridian largely agrees with the specific proposals in the consultation paper but considers that these are only a subset of the issues that require discussion before finalising schedule 11.3 of the Code. Meridian's view is that prior to finalising the Code a workshop should be held including traders, distributors and metering equipment providers (MEPs). The workshop should have two areas of focus, a discussion of the remaining 'niggles' from the part 10 implementation, flowing into a full discussion of necessary changes to schedule 11.3. Meridian has identified the following topics that have not been addressed in the consultation paper and other parties may have additional topics they wish to raise.	The Authority intends to hold a joint MEP/retailer workshop to discuss operational issues and alignment of information.
3b			The ability for read request (RR) files to be initiated in both directions. Currently only the gaining trader can send a RR.	Noted. This was not considered in the review as the losing trader should have all meter read records, and should not need to amend the start read. The losing trader can co-operate with the gaining trader where any inaccuracies are discovered. This suggestion would require consultation. The Authority may consider it as part of any future review of switching arrangements.
3c			MEPs providing read data directly to the registry, reducing the number of disputed reads.	Noted. This was discussed, but not specifically consulted on at paragraph 3.3.8 of the consultation paper. The Authority will not be proceeding further with this issue at this time.
3d			The limitation on switch withdrawals to within 2 months of the event date. There are cases where for the benefit of the consumer a	Although the registry does not prevent a switch to be withdrawn after 2 months, the

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3e			withdrawal is required further back than 2 months. Withdrawals should be allowed with the approval of both parties over longer timeframes. Alignment of MEP response times with switching timeframes. In some cases switching timeframe breaches occur as a flow on effect of MEP timing.	Code does. Therefore, under the Code (clause 17 of Schedule 11.3 of Part 11) if a trader withdraws a switch later than 2 months after the switch was made, the trader would be breaching the Code. The current timing requirements for MEPs' registry updates were put in place as a result of industry consultation. Review of this timing requirement requires consultation with all affected participants and is beyond the scope of this consultation. The Authority will consider this suggestion as part of any future project to review the switching arrangements.
3f			Introduction of a meter communicating flag on the registry.	Please refer to the response in relation to the submission on the use of "indicators" in the registry in submission comment 1b, above.
3g			How to ensure consumers are well informed of planned outages. There is the potential during the switching process for consumers to miss notifications. A broader discussion is warranted on this topic to include how best to serve customers with information on planned and unplanned outages and restoration information.	The retailer responsible for an ICP should continue to process network outage notifications until a switch is completed. A period may exist where a notification is incorrectly given by a distributor to the previous retailer. The Authority consulted with participants on using a centralised approach for outage management in section 14 of a consultation titled "More standardised line distribution arrangements: Proposed amendments to the Code" on 26 May 2011. The main concern expressed in submissions on that paper was that the cost was likely to exceed the benefits.
3h			Whether there is merit in aligning the HHR switching process more closely to the NHH switching process, with the losing trader being the party to confirm the switch. Closer alignment may allow for some automation of HHR switches particularly in uncomplicated cases where there are no metering changes.	Agree, and this was discussed in para 3.3.7 of the consultation paper. Further work would be required to implement this, as it could be a very large change to participants' systems. However, such a change would facilitate synchronisation of a switch event date with a meter change, and could also enable more efficient switching. For this reason the

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				Authority may consider this issue in the future.
4a	General comments	Metrix	In general, Metrix supports the Authority's initiatives in evolving the regulatory framework towards achieving its statutory objectives of competition, reliability and efficiency.	Noted.
4b			However Metrix is concerned with section 3.3.18 of the Consultation paper where the Authority correctly notes that "MEPs are not currently involved in the switching process...", but goes on to suggest that "...in the case of a standard switching or switch move, where only AMI meters are in use, the MEP could provide switch event meter readings directly to the registry instead of to the losing trader, who in turn provides it to the registry."	Noted. The Authority has not proposed to make this change as part of this proposal. Rather, the Authority sought participants' views on whether this should be included in the Code and registry functionality in the future.
4c			The role of the MEP is now well defined in the Code as being accountable for the compliance and integrity of metering installations. This role has been purposefully separated from trading to allow clear accountabilities between market trading and infrastructure management. Engaging MEP's in the switch processes will begin to blur responsibilities between participants and will create an additional layer of business processes and costs that are, in our view, unnecessary.	Noted
4d			Today, Metrix' standard service to retailers is the provision of a compliant accumulated register read every day for each meter in service. In this context a losing trader has access to the same data as the MEP, and can readily apply this for switching purposes. Most importantly, the losing trader will intrinsically understand how the data has been used for billing purposes in relation to the switch event date – a key element in which MEPs have no visibility.	Noted. However, this is out of the scope of this proposal.
4e			We would also strongly object to any suggestion that MEP's should provide switching reads directly to the Registry. Aside from concerns about the introduction of additional accountabilities, this would be a significant step toward a regulated industry consumption database that would ultimately discourage differentiation and innovation initiatives amongst MEP's and traders.	Noted. However, this is out of the scope of this proposal.
4f			While our concerns are not directly tied to the eight questions the Authority has posed in relation to the Consultation paper, we have noted these in the Authority's standard response format.	
	General comments	Powerco	<i>Powerco supports the Authority's work to rectify issues associated with the profile code and submission type fields</i>	

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5a			1. Powerco is pleased to see the Authority addressing identified issues with the switching process as a result of the new Part 10 and associated amendments to Parts 1, 11 and 15 of the Code. The amendments have resulted in some unforeseen consequences that have significantly affected our billing process and, as a consequence, other industry participants.	Noted.
5b			2. We consider that the proposed changes to the profile code and submission type fields will be a good step towards rectifying the issues that can result in incorrect volumes being allocated to traders and, consequently, inaccurate invoicing. As the proposed Code amendment remains reliant on traders voluntarily populating the field, we recommend that the Authority monitor the situation to ensure a high level of compliance is being achieved.	Noted.
5c			3. Powerco would also like to raise the issue of the time that it is taking to resolve volume disputes that have been caused by incorrect management of the submission type field. Often the trader submitting incorrect data to the Reconciliation Manager is easily identifiable and corrections are made in a timely manner; however, it frequently takes significant time for the Reconciliation Manager to complete its investigation, make the appropriate adjustments and generate the reports that allow the invoice process to be completed correctly. This can unnecessarily increase the scale of the initial submission type field problems.	There were several errors discovered in the ICP days reporting that created scaling issues within the reconciliation process (as discussed in 2a, above). Volume disputes are resolved as soon as possible, but complex issues, or issues where participants are required to correct information may take a little time. These issues were resolved in accordance with the Code, but may have had a flow on impact into non-Code settlements. Participants' systems should be aligned with the timeframes that are specified in the Code for correcting information.
5d			<i>Technical group representation</i> 4. We are pleased to see the Authority utilising industry knowledge and expertise through working groups to identify and propose changes to market operations. We consider this to be an effective way to communicate what the real industry issues an essential mechanism for developing comprehensive and meaningful consultation papers. We do, however, recommend that, in instances such as the review of the switching process, the Authority consider widening the groups it calls together to include all participants that are directly and indirectly affected.	
5e			5. We acknowledge that the representatives (all retailers) on the ad hoc technical group for the switching process did a good job of identifying the important issues, but consider that having	Noted.

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5f			distributor, metering and reconciliation manager representation would have provided alternative perspectives. We recognise that this may not be appropriate in every instance, but believe it should be a consideration when establishing the groups. <i>Conclusion</i> 6. Powerco supports the Authority's work to rectify the unintended consequences of the Part 10 changes and anticipates that the Authority will continue to promptly review and address any other related matters that may arise.	Noted.
6a	General comments	PUNZ	MEP Involvement: Pulse believes that MEP involvement in the switching process is crucial to the switching rules being able to function as expected. As we have seen since the implementation of Part 10 MEP's are not fully aware of the switching process and how their data on the registry affects the switching process. MEP errors and delays in updates on the registry have caused significant delays to the switching process since the implementation of Part 10. We believe any future changes to the switching process require MEP involvement to ensure that switch delays and impacts are minimised as MEP's become aware of what requirements they will face before the go live date.	Noted. The Authority considers that this is both a compliance and operational issue for MEPs. The Authority assumes from the comment that the issue is not with delayed information from field work, which may have always been a problem for switching new ICPs. Rather, the Authority considers the comment raises concerns that MEPs have the information but do not update the registry in a timely manner, or do not correct inaccurate information in the registry as soon as practicable. The Authority intends to hold a joint MEP/retailer workshop to discuss operational issues, alignment of information and participant obligations. Agree. The Authority proposes to carry out this change.
6b			Submission Flag Update: Pulse believes that the submission flag change should be implemented under urgency. An incorrectly set submission flag could have a significant effect on the reconciliation processes, and the impact of an incorrect submission flag for a small number of sites, in conjunction with the default volume allocated to time of use sites, has the potential to place a substantial financial burden on the trader. The data provided in the review shows that this change is not complex and could be implemented quickly, so we urge the Electricity Authority to expedite a resolution.	
6c			Review of Part 15: The submission flag issue has highlighted a significant oversight in the existing Part 15 rules. With the introduction of smart metering and the use of smart data, traders will be evolving their reconciliation processes to make use of HHR data for residential customers. Traders will be	

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			using the HHR profile for residential TOU sites. The default values assigned to a trader for these sites are appropriate for commercial TOU sites, but are not appropriate for residential TOU sites. The result is that a residential site that uses approx. 8,000 kwh per year could be allocated default volumes of 55,000 kwh per month. This issue in particular has the potential to place a substantial financial burden on the trader.	reconciliation manager from the registry, scaling would not occur. The Authority will consider this suggestion as part of a possible future project to review the reconciliation manager's processes under Part 15 of the Code to reflect the increased use of AMI data.
7a	General comments	Trustpower	1.1.1 Our submission to the Consultation Paper focuses on and raises the following issues/points: a) The need for clarification around metering flags and combinations, and how these are interpreted by different participants; b) Half-hour switching should only relate to Category 3 meters and above, to avoid the issues we are experiencing at present; c) Assumptions have been made that Part 10 has reduced manual processes, which is not the case; and	Noted. Please refer to the response to 1b, above.
7b				Disagree. In the rare event that an ICP contains both a HHR and a NHH metering installation, only one switch process can be carried out. ICP switching is not carried out by metering installation, it is carried out for all metering installations within an ICP
7c				Disagree, provided that MEPs' registry records are accurate and provided in a timely manner. The obligation for population of metering information in the registry and the obligation to manage compliance with the Code has moved from the retailer to the MEP. Provided that this was previously done in accordance with the Code, there will be a reduction in manual work requirements for retailers. During the implementation of the new Part 10 the market and registry processes were adjusted to allow automated AMI switching using the NHH process set out in clauses 1 to 12 of Schedule 11.3. Without this adjustment, AMI switches would have been either manual or would not have been possible at all (customers would not have been able to switch retailers). These issues were discussed within the April 2012 consultation paper on changes to the switching process. As noted in the consultation paper for these

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7d			d) Further review of this consultation process is required to future-proof and ensure end-to-end processes are not compromised.	amendments, the new process appears to be switching HHR AMI metered ICPs without a problem That the accuracy of registry metering records is causing retailers to use manual work-arounds may be a sign of participants breaching the Code. Participants are required under the Electricity Industry (Enforcement) Regulations 2010 to report breaches of other participants of the Code to the Authority Noted, the intention of the proposed amendment is to future-proof the Code and market processes as AMI HHR and other new technologies become available.
8a	General Comments	WEL Networks	<i>WEL supports having an efficient and cost effective switching process</i> 1. WEL supports the majority of proposals to make changes within the registry and Code to assist gaining traders and to minimise volume disputes. Detailed answers to the questions are appended.	Noted.
8b			2. WEL does not support the proposal to allow backdating of half hour (HHR) sites up to 90 days. The current process of not allowing backdated HHR switches has been in place for many years. The costs associated with backdating should be borne by the parties best positioned to manage these, the retailers themselves. We do not agree with the papers stated position that these costs are an unreasonable additional cost to bear by those creating them i.e. exacerbator pays.	The Authority notes that backdated switches (as well as switch withdrawals, as discussed in 3d, above) do occur. Backdated switches and switch withdrawals do not negatively impact the reconciliation process. Any costs or issues associated with line charge re-invoicing by a distributor would be best included in the use of system agreement between distributors and retailers. The Authority expects there would be few HHR switches backdated beyond the current month.
8c			3. By allowing for the backdating of switching for HHR there is no incentive on Retailers to act in a timely fashion. WEL considers this to be backwards step for the efficiency and effectiveness of the process and against the long-term interests of consumers. The proposed rule change would become inconsistent with Non HH adding complexity and creating the potential for confusion	Noted. Backdating of switching is occurring. Most submitters have submitted that they agree with the proposal.

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8d			for no benefit to consumers.	The right to withdraw a switch has existed since October 2002. Clauses 17 and 18 of Schedule 11.3 of the Code provide for withdrawal of switch requests. Network charge invoicing of a retailer for line charges is not included within the Code, and should be addressed in the use of system agreement between distributors and traders.
8e			4. WEL's billing systems have not been designed to backdate HHR switching. If this proposal were to be implemented then WEL would incur costs to implement and maintain which do not currently exist. The stated objective 4.2.1 (d) of minimising costs to participants would not be met. As the cost incurred would relate to a regulatory change lines businesses can legitimately pass these on to consumers. <i>Conclusion</i>	
8f			5. WEL supports the majority of changes to the registry and Code to allow for a smoother process for switching. 6. WEL believes that allowing for backdating of HHR switching, creates the wrong incentives, inconsistency and transfers cost away from exacerbators to line businesses and is not in the long-term interests of consumers.	
9a	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	Contact Energy	Contact notes that the original purpose of ICP-days reporting and electricity supplied (essentially as billed) reporting was to enable easy identification of misalignment between billing and reconciliation systems as occurred some years back when d-cypha was providing data administration services to several traders. The suggestion at the time was to introduce these two reports into the mix to be used to identify misalignment, not to be used as inputs into scaling. Scaling adds unnecessary complexity and distraction when complete and accurate (high quality) submission information is scaled because of operational timing issues (and in the case of ICP-days scaling also because of the issues around profile and submission type). While option (b) will materially reduce scaling, it will not eliminate it.	ICP days scaling was introduced in the Electricity Governance Rules 2003 following extensive consultation. There have been subsequent amendments to implement the new reconciliation rules that became effective on 1 May 2008. Scaling has been retained throughout these amendments to create a commercial incentive for traders to maintain records accurately. The "submission type" field was called "meter type" before 29 August 2013, and it performs the same function. Traders have always had a requirement to maintain accurate information in the profile and meter type fields, but some traders do not appear to have developed processes for the management of this information. The proposed amendment is intended to remove only the requirement to update the submission type flag at the time of a switch. Traders should still have processes

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9b			It is Contact's strong preference that the ICP-days scaling factor be set to 1.0000, similar to the approach taken for electricity supplied (i.e. scorecard) which has always been set to 1.0000. The industry should be looking at removing unnecessary complexity and simplifying processes where appropriate, and we now have a great opportunity to achieve this outcome by adopting option (a) and removing ICP-days scaling. The simplest way to achieve this would be to set the ICP-days scaling factor to 1.0000 while still requiring traders to submit ICP-days reports (reflecting their own system) which can be compared with the registry produced ICP-days as a KPI. Then if a comparison of ICP-days provided by the trader with ICP-days provided by the registry, or electricity supplied provided by the trader with submission information provided by the trader on a 12 months rolling basis, indicates outlier misalignment then the Authority can focus attention on the trader with outlier performance. This would be far more efficient for traders and reduce unnecessary complexity in the reconciliation process. The above is consistent with the Code change proposed by Contact on 28 June 2012 after other members of the Retailers Forum agreed with Contact that ICP-days scaling was inappropriate and an inefficient distraction, that it should cease or be set to 1.0000, and that a change be made to allow misalignment to be monitored to identify outlier performance. Accordingly Contact considers that both options (a) and (b) should be progressed in order to ensure the reconciliation process is as accurate and efficient as possible, and to eliminate any inputs that distort the ICP days scaling process and the unnecessary distractions and disputes. Contact can see merit in retaining the ICP days report as a monitoring	to manage change of profiles and any associated changes to submission types that this may require. The Authority considers that commercial incentives on participants to appropriately manage information used in the reconciliation process are essential to the credibility of market settlement. ICP days provides a commercial, rather than a regulatory, incentive to maintain registry records and reconciliation information accurate. Noted. The Authority will consider this suggestion as part of a possible future project to review the reconciliation manager processes under Part 15 of the Code in light of the increased utilisation of AMI data in market processes. ICP days provides a commercial, rather than a regulatory incentive to maintain registry records and reconciliation information accurate. Noted. As discussed above, the Authority will consider this suggestion for a potential future project.

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9c			tool to assist in identifying ownership or outlier system or process issues, however we believe that the best source of reconciliation data is the Trader's internal system. This is primarily due to the fact that the Trader's system is responsible for the attributes stored within the registry (which the ICP days report subsequently uses) and any timing issues as a result of this interface would be minimised and not fed into the reconciliation process. Contact considers that the reasons under the consultation paper for not removing ICP days scaling (3.1.8a i & ii – removal of obligations and incentives for traders) aren't accurate. There are multiple related requirements under parts 11 and 15 of the code enforcing the accuracy of data within the registry and reconciliation process.	
9d			Contact considers that the change is relatively small if the ICP days report remains as a monitoring device, is still submitted via the registry or RM to appropriate participants and is removed from the reconciliation process. Contact also considers the registry change to automatically update the submission type is very minor and would enhance the accuracy of the ICP days report.	
10	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	Craftware Computing	N/A	Noted.
11	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	EDNZ	No – Options 3.1.8 (a) & (b) only make mention of profile codes?	Paragraph 3.1.8(a) relates to the application of scaling factors that only occurs when there is a mismatch between the profile code and the submission type. Paragraph 3.1.8(b) relates to the automated update of the submission type flag in the registry, so that the submission type flag aligns with the proposed profile code only at the time of a switch. Any subsequent profile code or submission flag changes made by a retailer will need to be reflected in the retailer's maintenance files and screens. This is not a new obligation within Part 10, and all

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				participants should have existing processes to reflect this.
12	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	Flick Energy	Yes	Noted.
13a	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	Genesis Energy	No. The consultation paper only addresses one avenue in which submission flags may change – when going from a half hour (HHR) reconciling trader to a non-half hour (NHH) reconciling trader. The decision on how to change from NHH to HHR reconciling of an ICP does not always occur at the time of switching a customer. More often, this occurs later and outside of the switch process when a reliable, consistent HHR data stream is confirmed. The Authority's proposed options therefore will not address this type of change.	Agree. The Authority's proposal relates to the automated update of the submission type flag in the registry at the time of the switch, so that the submission type flag aligns with the proposed profile code. Any subsequent profile code or submission flag changes made by a retailer will need to be reflected in the retailers maintenance files and screens. This is not a new obligation within Part 10, and all participants should have existing processes to reflect this.
13b			We also note that removing ICP days scaling does not remove the obligations stated in paragraph 3.1.8(a) of the consultation paper. If there is a discrepancy between the Registry and the Traders' system, in terms of what the Reconciliation Manager expects to be reconciled, default volumes are added to the trader's allocation. This is the incentive to ensure data is aligned. Given these two concerns, we consider that the Authority should be undertaking both actions discussed.	Noted.
14	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	Meridian Energy	Yes, the issue with inconsistencies between profile codes and submission types has been appropriately identified.	Noted.
15	Q1 - Do you consider the Authority has identified and	MRP	Yes. The issues have been appropriately identified and we agree that option (b) would be the preferable solution particularly if no code change or change to the participants system is needed.	Noted.

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	appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.			
16	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	Nova Energy	Yes	Noted.
17a	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	Powerco	Yes. The issue of incorrect submission type fields being submitted to the Reconciliation Manager through the registry has significant repercussions for the reconciliation and invoicing process for traders, distributors and the Clearing Manager. Since the introduction of Part 10, there has been a noticeable increase in the volume of invoice disputes related to incorrect data in submission fields. While this issue has been identified, we do not believe that the scale of the problems related to the mismanagement of the submissions type fields has been fully identified in the consultation paper. The reconciliation methodology creates an environment that causes one or more parties to be affected by the actions of another party regardless of whether they have been compliant with related Code requirements or not. Therefore, the time and resources required to correct the error is not just a cost to the party failing to meet the Code requirements, but also multiple other parties.	Noted. The submission type field is the same as the meter type field that was used in the registry until 29 August 2013. There has been a requirement on traders to manage this particular field since October 2002. There were several errors discovered in the ICP days report that caused the volume disputes referred to in the submission. These were: a) inaccurate information provided by participants to the registry b) inaccurate information in the registry Issue (b) has been addressed, but the scale of issue (a) has only become evident since the new Part 10 came into effect.
17b			Powerco would also like to raise the issue of the time that it is taking to resolve volume disputes that have been caused by incorrect management of the submission type field. Often the trader submitting incorrect data to the Reconciliation Manager is easily identifiable and corrections are made in a timely manner; however, it frequently takes significant time for the Reconciliation Manager to complete its investigation, make the appropriate adjustments and generate the reports that allow the invoice process to be completed correctly. This can unnecessarily increase the scale of the initial submission type field problems.	Volume disputes are resolved as soon as possible, but complex issues, or issues where participants are required to correct information may take a little time. Participants' systems should be aligned with the timeframes that are specified in the Code for correcting information.

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18a	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	Powershop	Yes; however, while the issues that have been identified are valid and appropriately defined, there appears to be no foresight into the issues that the industry might face in the near future. Also missing is the expectations that the EA has on future market design in this area.	Noted. The consultation was intended only to address immediate issues in the switch process. The Authority expects to take a broader look at the implications of the increased utilisation of AMI data in market processes as a future project.
18b			The paper also does not appear to address the issues that NHH-only certified traders face when gaining an HHR ICP, specifically around downgrading and altering installations which cannot take place until the ICP is gained unless bilateral agreement are in place, which in itself can be a barrier to competition.	This issue arises only when a commercial or industrial HHR meter is required to be downgraded to an accumulating register NHH meter. The changes carried out as part of the new Part 10 project recognise that a trader can use time blocked absolute HHR volumes to settle non half hour consumption until the device is changed or reprogrammed. The downgrading process should be set out in participants' audited procedures.
18c			Powershop believes that the EA should also identify and address the underlying issues that have caused the switching timeframes to increase since mid 2013 as indicated by the switching timeframe reports regularly published by the EA (http://www.ea.govt.nz/industry/market/statistics-reports/)	Noted. The Authority has held an MEP workshop to discuss operational issues, alignment of information, and participant obligations.
19	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	PUNZ	PUNZ believe that the issues that have been identified have not been assessed appropriately as we believe a high priority needs to be placed on the resolution of this issue. We understand the financial impacts this has on retailers and believe this change needs to be implemented immediately.	Noted. However, the Code and the Electricity Governance Rules 2003 that preceded the Code have always required the profile code and the submission type (previously called "meter type") fields to be aligned. The Authority proposes to amend the registry functionality to align submission type and profile code at the time of the switch.
20	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	Trustpower	1.1 We agree that some issues have been identified. However, there are still outstanding issues as a result of Part 10 that need addressing before any further changes should occur. The Authority's assumption is that Part 10 has made processes simpler, but this is not always the case. The industry's processes require further future-proofing.	The Authority intends to hold a joint MEP/retailer workshop to discuss operational issues, and alignment of information that impacts trader and registry processes. The Part 10 project has highlighted issues that have always existed around the speed of access to metering information, the accuracy of metering records, and issues within the new connection process of new ICPs.

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21	Q1 - Do you consider the Authority has identified and appropriately assessed the issues or options related to the submission type field? If not, please outline your reasons.	WEL Networks	WEL supports changes to the registry that will allow for a switching process that reduces volume disputes.	Noted.
22	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Contact Energy	Contact considers the proposed changes to registry functionality to be sensible.	Noted.
23a 23b	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Craftware Computing	Not entirely. Reasons: 1. Re (a).Currently the profile code in the NT is mandatory. It has always been mandatory even before the Part 10 changes. We do not see any advantages in making it optional in the Registry now. 2. Re para 3.1.11. There is currently no validation in the Registry's trader maintenance function to make the profile codes or the submission types consistent with the business rules detailed in 3.1.10 of the proposal. We recommend that such validation is introduced; otherwise inconsistencies will remain in the Registry regardless of what is generated as a result of the NT. For example, traders would be able to set the profile code to HHR, submission type HHR to N (No) and submission type NHH to Y (Yes). This would make the information inconsistent.	Agree. Noted. However participants should ensure that their back office systems provide the outputs required by the Code. In the event that a participant sets a mismatch to the information described, they will incur ICP days scaling. Therefore there is a commercial incentive to ensure that participants' systems maintain alignment of information with market systems.
24	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	EDNZ	Agree with proposed changes as written in 3.1.10 but how 3.1.11 is phrased implies that only for HHR switches that the gaining Trader completes? Suggest clarification with mention of NT file.	Paragraph 3.1.11 was intended to only apply to the NT file. So it would apply to all NHH and HHR switches initiated. Under the proposal the Authority will amend the registry functional specification to ensure this is clear.
25	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Flick Energy	Yes.	Noted.

No.	Question	Submitter	Response	Authority response
26	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Genesis Energy	We are comfortable with the change proposed in option (b), but as discussed in question one above, we consider that option (a) should also be done. We would recommend that the ICP days files still be submitted by traders for use as a KPI check, but have the scaling removed from the reconciliation process.	Noted, see the Authority's response to submission comment 2, above.
27	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Meridian Energy	Yes, Meridian agrees with the proposed change to registry functionality where the profile code and submission type field will be automatically updated based on the profile code supplied in the NT file.	Noted.
28	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Metrix	N/A	Noted.
29	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	MRP	Yes. We agree with the proposed change to registry functionality.	Noted.
30	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Nova Energy	Yes.	Noted.
31a	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Powerco	Yes. The proposal presents a simple and efficient way to address the issue by allowing gaining retailers the opportunity to ensure that fields are populated accurately – it focuses on addressing the root cause of the problem, rather than managing it once it has risen. The process does remain reliant on a retailer (gaining or losing) correctly populating the fields in a timely manner rather than introducing any mandatory rules. As such, we recommend that the Authority further consider how to ensure a high level of compliance is achieved.	Noted.
31b			We also recommend that the Authority consider an educational campaign to promote understanding of how incorrect registry field management can have consequences across market participants.	Agree. The Authority anticipates this taking place as part of relevant industry workshops.

No.	Question	Submitter	Response	Authority response
32	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Powershop	Yes	Noted.
33	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	PUNZ	PUNZ agree with the functionality used to determine the flag structure.	Noted.
34	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	Trustpower	2.1 No – the industry needs clarification regarding the use of these flags. These are being interpreted differently by different participants, causing downstream issues.	Disagree. Profile codes and submission type flag (previously the meter type flag) have been in use for a long time. <i>Profile code</i> is the approved profile code that records the profiles that the trader wants used in their market settlements for an ICP. <i>Submission type flag</i> is the type of submission information (HHR or NHH, the definition of which has not changed) that the trader will provide in their submissions to the reconciliation manager.
35	Q2 - Do you agree with the proposed change to registry functionality? If not, please explain why not?	WEL Networks	This appears to be an efficient method to update fields automatically.	Noted.
36	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	Contact Energy	Contact agrees that the current clause relating to the application of meter readings requires amendment to include variations under the switching process.	Noted.
37	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event	EDNZ	Yes.	Noted.

No.	Question	Submitter	Response	Authority response
	meter reads? If not, please explain why not?			
38	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	Flick Energy	Yes.	Noted.
39	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	Genesis Energy	We disagree with the Authority's view, as set out in paragraph 3.2.4 of the consultation paper. In a switch, a switch event date is set (say 10 February) and this is the first day of the new trader's ownership. In the switch files, a read is sent that is deemed to be the read for that day. If the read is actually taken on that day, then there is no problem as clause 61 states that the read is deemed to apply at any time that day (i.e. from 0000 to 2400 on the 10 February). In real terms, there is not even a problem if the read was taken the day before (technically a breach of the rules), as again clause 6 specifies that it is applicable until 2400 of the 9 February. There is no real difference between a read at 2400 on 9 February and 0000 on 10 February. In terms of material impact, Genesis Energy does not see where the problem lies. There is no issue with volume, as each trader finishes/starts on the same read, so it is irrelevant what time the read is deemed to be from. There may be an issue if the losing trader does not correctly count the days to reconcile. For example, if the losing trader counts to the event date, rather than the day before (which is their last day), then they will be reconciling for one extra day. However, this is actually an issue with the trader's process, not the Electricity Industry Participation Code 2010 ("the Code"), and results from an error in participants' understanding of what the switch event date is. This could possibly signal that further clarification of the existing Code is required for some participants. Given these concerns, Genesis Energy requests that the Authority more clearly articulate the real problem around this issue, before any changes are proposed to the Code.	The issue is that currently there is a conflict between Part 11 and Part 15 of the Code of when a meter reading applies. The intention is to address this conflict to ensure that the Code is fully aligned.
40	Q3 - Do you agree with the Authority's view of issues and options related to the	Meridian Energy	Yes.	Noted.

No.	Question	Submitter	Response	Authority response
	application of switch event meter reads? If not, please explain why not?			
41	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	Metrix	Metrix agrees that the Code must be consistent in word and application	Noted.
42	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	MRP	Yes. We agree that there is a conflict between Parts 11 and 15 of the Code which can only be resolved by an amendment to the Code.	Noted.
43	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	Nova Energy	Yes	Noted.
44	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	Powerco	Yes. There is a clear conflict between the requirements of related clauses in Part 11 and Part 15 that only a Code amendment can rectify. We support the decision to align clauses in both Parts so that they read that the transition of the ICP to the gaining retailer should be on the notified event day, as per the current Part 11. This creates consistency with the use of other event day terms in the registry and provides a simple low cost solution.	Noted.
45	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	Powershop	Yes	Noted.

No.	Question	Submitter	Response	Authority response
46	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	PUNZ	PUNZ agree with the view of the issues raised.	Noted.
47a 47b 47c	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	Trustpower	3.1 This assumes all traders have contracts in place with MEPs, which may not be the case currently. 3.2 Issues with reads being provided by MEPs as part of the switch is a concern, given we currently experience data integrity issues with MEPs that are causing lengthy time delays to switching, new connections and other metering type processes. 3.3 The Authority should ensure that it consults adequately with MEPs on this point.	Traders will be non-compliant with the Code if they are not the MEP or do not have an arrangement with the MEP for the ICP. Agree. If this is the case, then an MEP is likely to be breaching clauses 2 and 3 of Schedule 11.4 which specifies the period given to MEPs to update registry metering records. The Electricity Industry (Enforcement) Regulations 2010 require participants that believe, on reasonable grounds, that another industry participant has breached the Code to report the breach or possible breach to the Authority as soon as possible. MEPs have also had the opportunity to provide submissions on this point. The intention of this proposed Code amendment is to clarify how reads are treated within the reconciliation process rather than how they are provided, under arrangement with retailers.
48	Q3 - Do you agree with the Authority's view of issues and options related to the application of switch event meter reads? If not, please explain why not?	WEL Networks	WEL has not fully investigated this but it appears reasonable.	Noted.
49	Q4 - Do you agree with the proposed Code amendment to clarify the requirements	Contact Energy	Contact agrees with the proposed amendment providing clarification on the date and time a switch event meter reading applies from. Contact would also like the EA to consider a similar amendment or	Noted. The Authority will change the proposed Code amendment to incorporate this suggestion.

No.	Question	Submitter	Response	Authority response
	for non-half hour meter reads? If not, please explain why not?		clarification to include the scenario where an ICP has been made inactive. There is currently mixed interpretations on whether the disconnection or meter removal reading should apply from the end of the previous day or the event date itself.	
50	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain why not?	EDNZ	Yes.	Noted.
51	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain why not?	Flick Energy	Yes.	Noted.
52	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain why not?	Genesis Energy	We disagree with the proposed amendment as it is cumbersome and does not address the root cause of the problem (see comments for question three). We recommend the following change to Schedule 11.3, clause 5(b) and clause 11(b): "...or a permanent estimate as at the actual event date – 1 day to the gaining retailer." In this way, the losing trader provides a read that is deemed to be a read as at 2400 on the last day of their responsibility, which of course is the start read at the beginning of the first day of the gaining retailer.	Noted. The definition of switch event meter reading allows the use of a permanent estimate under certain circumstances. The Authority considers this is clarified by the amendments.
53	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain why not?	Meridian Energy	Yes, Meridian agrees with the proposed code amendment to clarify the timing of when meter reads apply especially in the event of switching.	Noted.
54	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain	MRP	Yes we agree; however, the non-half hour meter read must apply consistently throughout the code.	Noted and agree.

No.	Question	Submitter	Response	Authority response
	why not?			
55	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain why not?	Nova Energy	Yes	Noted.
56	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain why not?	Powerco	Yes. The proposed Code amendment reflects the approach in Part 11 and provides the clarity and consistency required.	Noted.
57	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain why not?	Powershop	Yes	Noted.
58	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain why not?	PUNZ	PUNZ agree with the change to the rules regarding NHH reads.	Noted.
59	Q4 - Do you agree with the proposed Code amendment to clarify the requirements for non-half hour meter reads? If not, please explain why not?	Trustpower	4.1 Reads need to be materialistic and follow one approach. However, the proposal does not address other metering events which have associated metering reads. This needs further consideration and review.	Noted. The proposed subclause 6(b) of Schedule 15.2 covers all other instances of non-half hour meter reads required for Code purposes, but cannot regulate reads used for non-Code purposes.
60	Q4 - Do you agree with the proposed Code amendment to clarify the requirements	WEL Networks	WEL has not fully investigated this but it appears reasonable	Noted.

No.	Question	Submitter	Response	Authority response
	for non-half hour meter reads? If not, please explain why not?			
61	Q5 – Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	Trustpower	5.1 This all depends on data quality, as this is currently an issue. Customers should not be impacted by changes to processes. 5.2 The Registry currently has some data integrity issues, relating to the interpretation of metering flags. We are also experiencing delays in metering information becoming available. This is impeding participants' ability to switch.	Agree. Data quality and records are industry issues. Accuracy of metering records was regulated under the old Part 10 and continues to be regulated under the new Part 10. The intention is to ensure that customers are not unduly impacted. The Authority is aware that this proposal will impact customers, but expects this impact to be positive. The proposal is about aligning the date and time that applies to a meter reading between Parts 11 and 15 of the Code to improve the efficiency of the switch process.
62a 62b	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	Contact Energy	Contact considers some of the issues and options identified to be sensible, however believe that if the aim is to avoid potential confusion and improve the switching process, further minimal changes could be made to satisfy all problematic areas. Multiple metering types on an ICP The proposed options still do not cater for the scenario where an ICP with a highest meter category of 2 could be either ToU metered (Time of Use) or not. Contact considers that if a change is going to be made it should be robust enough to cover all scenarios and not create any ambiguity. Contact considers this could be facilitated very simply through the gaining Traders switch type within the NT file. If the gaining Trader sets the switch type as TR or MI the registry progresses the switch through the non half hour switching process. If the gaining Trader sets the switch type as HH then the half hour switching process is used. If the above change in logic could be established to have a clear identifier to trigger the ToU switching process this would also result in the removal of a related issue. Contact has observed issues where the MEP has certified a smart meter as HHR, however the communications device has not been confirmed or updated in the registry. This is causing issues in the switching process due to the fact the AMI flag has not been set sending the switch down the NHH switching process. The NT file (notice of	Noted. Noted. Switch types of HH should already trigger the half hour switching process. Noted. A smart meter that is not communicating may be an HHR meter

No.	Question	Submitter	Response	Authority response
62c			transfer) is rejected by the registry where the above condition is met and the previous Traders submission type is marked HHR. Tenure of an ICP Contact considers the requirement to obtain an actual reading during period of supply to be reasonable and believes it eliminates the potential for customers to repeatedly switch without the Trader obtaining an actual reading. Contact can see benefit in softening the requirement on Traders to obtain an actual reading during a short period of tenure, however cannot easily identify a way to achieve this without relaxing the rule completely. As a result of the above, Contact considers the requirement to still obtain an actual reading during period of supply to be beneficial to the switching process. While it will not be possible to meet this requirement in a number of cases the volume of these scenarios will decrease with increased AMI and Traders should not be penalised where a reasonable amount of effort has gone into attempting to obtain an actual reading.	Noted.
62d			Switch event meter read for AMI ICPs Contact considers the proposal to enforce actual meter readings where the meter has AMI capabilities to be a little premature. While a number of Traders already use AMI meter readings in the switch process there are a number of dependencies on registry metering data, device data being available in a timely fashion or limitations, particularly in the case of a switch move. The process becomes reasonably complex where a backdated switch date is requested due to a delayed sign up by a customer and the proposed rule change would potentially result in a large number of minor technical breaches where an actual reading couldn't be obtained. As a result of the above, Contact considers the status quo to be practical at this point in time and that the quality of estimate switch readings on AMI meters to be acceptable given that the switch estimate would have been based on actual readings. Enforcement of actual meter readings would increase costs through considerable system development for a number of Traders.	Noted. The Authority will not proceed with this proposal at this time.
63a	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch	EDNZ	As per our covering letter * – if Mass Market and TOU sites were defined, it would be more straightforward to then amend the Code to clarify which switching process applied to each.	Switch processes are defined under clauses 1 to 7 (standard mass market), 8 to 12 (move in switch mass market), and 13 to 16 (half hour switch) of Schedule 11.3.

No.	Question	Submitter	Response	Authority response
63b	move processes? If not, please explain why not?		Multiple Metering Types Would question how often these circumstances occur currently.	It is unknown how often these circumstances occur. However, if they do occur there would be a problem. The Authority considers the most efficient approach is to ensure there are no problems in the event that these circumstances occur.
63c			Final Information 3.3.7 EDNZ supports option (a), code addition would bring it into line with what is happening in practise.	
63d			Tenure of an ICP 3.3.10 (a) (ii) agree with the suggested period.	
63e			Metering Category 3.3.12 as above, Metering Category would be one of the contributing factors as to whether site was Mass Market or TOU.	
63f			Switch event meter read for AMI ICPs 3.3.13 EDNZ supports option (b) and strongly opposes option (a) which assumes all Traders receive automated AMI meter reads for their sites – that is not the case.	
64	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	Flick Energy	Yes	Noted
65a	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	Genesis Energy	We have the following comments on the Authority's view of the issues within the standard switch and switch move processes: ☐ Paragraph. 3.3.3(c): Tenure of an ICP is an issue for all sites, not just those without AMI meters. Despite having an AMI meter, the billing systems (from which switching processes run from) still only have the cyclic reads stored (i.e. once a month);	Noted. However, in this case there is still an actual AMI read available.
65b			☐ Paragraph 3.3.13: Unfortunately the Authority's consideration of being able to supply an actual read for each and every AMI switch is not based on how AMI meters are handled operationally in billing systems. As mentioned above, we do not have a read from an AMI meter for	

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65c 65d 65e 65f 65g			each day residing in the billing system. To provide an actual read for a switch date would require us to request a special read for that date. Currently, to make that read available would take longer than is allowed in the switch timeframes. The cost, although lower than non-AMI costs, would still be prohibitive, due to the number of special reads involved. If we assume that we lose AMI sites in the same proportion to the general meter base, this could equate to 3,000 – 4,000 special reads a month at a cost of \$2 each. We consider that a technical solution to achieve the change suggested would be large in complexity and cost, involving multiple systems (both MEPs and Traders). We have the following comments on the options the Authority has put forward to address the issues within the standard switch and switch move processes: a) Multiple metering types: We agree with the Authority's preferred option (a); b) Final information: We agree with the Authority's preferred option (a); c) Tenure of an ICP: We agree with the basic resolution, but it needs to incorporate all ICPs, not just non-AMI ICPs; d) Metering category: We agree with the Authority's preferred option (a). A functional specification will also have to be adapted; and e) Switch event meter read for AMI ICPs: We strongly oppose any change due to the cost and inability to meet switch timeframes. We support continuing with the status quo.	Where an ICP moves from a losing trader using NHH submission type, to a gaining trader using HHR submission type (or vice versa) there is a potential for electricity to be over or under counted resulting in an unintended impact on consumer invoicing. This mismatch will occur due to inaccuracy of the estimated NHH accumulated register read and the actual NHH accumulated meter read that would correspond to the change of settlement from NHH to HHR by the gaining trader. Noted. Noted. Disagree, meter reads can be obtained for AMI meters. Noted. Noted.
66a 66b 66c	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	Meridian Energy	Multiple metering types – Meridian agrees that the switch process that applies to a site with both HHR and NHH metering should be defined by the highest metering category. Final information - Meridian agrees that the requirement to limit switch event meter reads to those channels in the registry with an accumulator type of C and settlement indicator of Y in final information provision should be explicitly in the Code. Tenure of an ICP – Meridian agrees with the issues and options detailed in relation to ICP tenure. Allowing switch event meter reads to be estimates for short tenure ICPs is a pragmatic and cost effective	Noted. Noted.

No.	Question	Submitter	Response	Authority response
66d			solution. There is one scenario that is of concern, an ICP that repeatedly switches in short timeframes may not have an actual meter read over an extended period. The requirements in schedule 15.2 require reads in certain timeframes but these are based on continuous supply by a single retailer. A backstop may be required to ensure an actual read is completed within a reasonable timeframe. Meridian acknowledges this is a rare issue and will decrease further as AMI meter penetration increases. Metering category – This is a similar case to the multiple metering type issue above. Meridian agrees that the switch process that applies should be defined by the metering category, with category 3 and higher following the process in clause 13 of schedule 11.3.	Agree that this would be a very rare event, and very unlikely to occur.
66e			Switch event meter read for AMI ICPs – Meridian agrees that switch event meter reads for AMI ICPs should be actual reads. However we note that this assumes all traders have agreements with all MEPs to provide this service, which may not be the case especially for small new entrant retailers. This topic was discussed at the workshop in September where one of the solutions proposed was that the MEPs should provide a switch event meter read (actual read for AMI) to the registry and the registry would notify both the gaining and losing trader of the switch event meter read. This is worthy of further consideration.	Noted.
66f			Future considerations – Given the April 2015 deadline for interim certification sites to be fully certified a significant number of NHH meters will be replaced in the coming year. With this in mind, finding a solution to ensure final reads from removed meters (whether the meter change is occurring as part of a switch or not) is critical. Meridian considers that full discussion of this issue with traders and MEPs is warranted. Meridian also considers that the following issues need to be addressed in relation to the standard switch and switch move processes. These issues along with a discussion of post part 10 implementation ‘niggles’ should be discussed in a workshop environment including traders, distributors and MEPs.	Noted. Traders could, in their arrangements with MEPs, require their MEPs to provide final reads when equipment is replaced. Alternatively the Authority could consider a Code amendment.
66g			The ability for read request (RR) files to be initiated in both directions. Currently only the gaining trader can send a RR.	The losing retailer is required to have records of meter readings. If an error has been made, the losing retailer may ask the gaining retailer to provide a RR. The Authority will consider this issue as part of for future Code amendment proposals.
66h			MEPs providing read data directly to the registry, reducing the number	

No.	Question	Submitter	Response	Authority response
66i			of disputed reads.	Noted. This was discussed in para 3.3.18 of the consultation paper. The Authority will further investigate this suggestion.
66j			The limitation on switch withdrawals to within 2 months of the event date. There are cases where for the benefit of the consumer a withdrawal is required further back than 2 months. Withdrawals should be allowed with the approval of both parties over longer timeframes.	The registry does not prevent a switch withdrawal after 2 months, but the Code does.
66k			Alignment of MEP response times with switching timeframes. In some cases switching timeframe breaches occur as a flow on effect of MEP timing.	The Authority intends to hold a joint MEP/Retailer workshop to discuss operational issues and alignment of information.
66l			Metering communicating flag on the registry.	
			How to ensure consumers are well informed of planned outages. There is the potential during the switching process for consumers to miss notifications. A broader discussion is warranted on this topic to include how best to serve customers with information on planned and unplanned outages and restoration information.	The retailer responsible for an ICP should continue to process outage notifications until a switch completes. A period may exist where a notification is incorrectly given to the previous retailer where the distributor fails to update their notification schedule with a retailer change. The Electricity Commission consulted on using a centralised system to forward outage notifications to retailers, refer to the Electricity commissions Information Paper on “More standardised line distribution tariff structures and use of system rules: key findings”, 2 September 2010”. At that time there was little industry support for a centralised system. In the event this is considered to be a significant issue, Meridian could consider submitting a Code amendment proposal.
67	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	Metrix	No - Please see the first page of the Metrix submission response	Noted, please refer to response to submission comment 4, above.

No.	Question	Submitter	Response	Authority response
68a	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	MRP	<u>(a) multiple metering types on an ICP:</u> We agree with the issue that the Authority has identified regarding multiple metering types. We support the option to follow the switch process based on the highest category of metering installation at an ICP. We do not support the combining of HHR & NHH metering configurations (which our system is currently unable to support) because it adds an additional layer of complexity that can give rise to errors.	Noted. The current CS file format already permits the combining of HHR AMI and NHH switch formats. Clause 5 and 10 of Schedule 11.3 of Part 11 already requires HHR AMI reads to contain an accumulating read to enable all retailers to carry out settlement obligations. The layer of complexity is avoidable by reviewing the registry metering records at the time a switch is initiated. This can be a real time query using web services.
68b			<u>(b) final information:</u> We agree with the issue identified and support the Authority's preferred option under 3.3.7 (a), however; the Authority's preferred option is problematic for the combination of HHR & NHH meters against 1 ICP.	Noted. The CS switch file for a cat 1 or cat 2 metering installation will complete a switch where there are both HHR and NHH meter registers used in settlement. The difference between the two is the provision of a meter read where the accumulator type = C and the settlement indicator = Y. For channels that records absolute information, such as HHR, switch event meter reads are not necessary.
68c			<u>(c) tenure of an ICP:</u> We agree with the issues identified and support the Authority's preferred option in part. Condition (ii) should be altered to 'where the losing trader has been responsible for the ICP for a period of less than six months'. With the proliferation of AMI meters, the reading frequency of the residual legacy meters in the market may eventually reduce as the marginal cost of reading these meters manually increases; therefore, three months may not be a sufficient timeframe, depending on when a switch occurs.	Disagree. Six months is too long a period and may introduce inaccuracies in customer invoicing and market settlements.
68d			<u>(d) metering category:</u> We agree with the issue identified and support the Authority's preferred option under 3.3.12 (a) however, the paragraph starts off with the word 'require'. It should say 'allow' which would seem more aligned with	"Require" is the intended word.

No.	Question	Submitter	Response	Authority response
68e			current regulation. <u>(e) switch event meter read for AMI ICPs</u> We propose that status quo be retained so that validated meter reads or permanent estimates are used for a switch. This is because in the majority of cases, actual meter reads are not available until the next business day and in many cases, reads aren't available until two days later. In some cases readings aren't available because of a communications issue with the meter – MEPs generally aim for 90% attainment levels within the first business day and higher by the second business day. The lack of availability of actual reads would cause delays in the switch process if the use of actual reads was mandated. For this reason, we support the retention of status quo.	Noted. However the status quo leaves complexity for the gaining trader at the time of an ICP switch where a gaining trader uses a different method of market and invoice settlement than the losing retailer
68f			<u>Further issues:</u> We agree with the additional issues that the Authority have identified within the standard switch and switch move processes.	Noted.
69	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	Nova Energy	Yes	Noted.
70a	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	Powerco	<i>Multiple metering types on an ICP</i> Powerco supports option (a) – following a switch process based on the highest category of metering installation at an ICP. The purpose of having different processes for higher category metering installations is that there is greater complexity associated with these installations. In the scenario of a combination of HHR and NHH metering components existing on one ICP, the switching process for the highest category metering installations should be used as this ensures the requirements of the highest category meter are met.	Noted.
70b			<i>Final Information</i>	Noted.

No.	Question	Submitter	Response	Authority response
70c			Powerco supports option (a) – amend the Code. This amendment will clarify the requirements relating to channels recorded in the switch completion file. Explicitly stating which switch meter reads are required will help to increase compliance with relevant clauses and reduce errors in the reconciliation process. <i>Tenure of an ICP</i> Powerco supports option (a) – use of estimated meter readings. We support the review and introduction of process improvements that reduce costs being passed on to customers by eliminating requirements that do not increase the efficiency of the industry. <i>Metering category</i> Powerco supports option (a). The proposed amendments reflect the requirements created by changing the metering environment and, as such, will promote the efficiency of the switching process. <i>Switch event meter read for AMI ICPs</i> Powerco supports option (a). If the capabilities are available to support the provision of an actual meter read than these should be utilised as part of efforts to improve data quality. If the Authority chooses to require an actual read when an AMI meter is being used, it needs to consider scenarios where an AMI meter may be installed but the trader does not have the capabilities to collect HHR data. In this situation, the collection of an actual read remotely would not be possible, so alternatives need to be considered in the Code amendments.	Noted. Noted. Noted. The Authority has decided not to proceed with the proposal to require mandatory AMI reads for the switch event meter read.
70d				
70e				
71	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	Powershop	Yes. Powershop strongly supports the idea to include MEPs in the switch process by having them provide switch event reads for AMI installations directly to the Registry. Powershop believes this would reduce switch timeframes and align with the EA statutory objective of promoting efficient operations for the long-term benefit of consumers.	Noted. The involvement of MEPs in the switch process was discussed in paragraph 3.3.18 as a potential future initiative. The Authority may consider this further in an possible future review of reconciliation and market processes in light of the increased utilisation of AMI meter data.
72a	Q5 - Do you agree with the	PUNZ	PUNZ agree that with smart metering being rolled out, there is an	Agree. There were two issues discussed in the

No.	Question	Submitter	Response	Authority response
72b	Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?		opportunity to improve the switching process where MEPs can supply smart data. In saying this, PUNZ believes there should be a trader and MEP workshop to go through the standard and move switch process to ensure these processes are mapped out thoroughly before changes are requested as we believe the changes that can be made, PUNZ don't agree that any switch changes should be going ahead without agreement from traders and MEPs and we do not believe December 2014 is a realistic timeframe for all parties involved to have system changes and updates complete to handle any changes made to the switching process.	consultation paper a) The mandatory use of AMI reads for the switch event meter read – the Authority has decided not to proceed with that proposal at this time b) Require an AMI MEP to provide the switch event meter read – this was a discussion item only, the Authority is proceeding with a proposal for this at this time Agree – the only changes to the switch process is to use the standard and switch move process for all category 1 and 2 switches. Most participants agree with this change. The balance of this process is placing requirements that were within the functional specification in the Code and not changing the switch process.
72c			Whilst we agree with that changes are required, we believe more time and investigation and more details surrounding the new processes needs to be completed prior to changes being made.	Agree. At the time the processes are being modified, this will be carried out.
73	Q5 - Do you agree with the Authority's view of issues and options within the standard switch and switch move processes? If not, please explain why not?	WEL Networks	WEL has not fully investigated this but it appears reasonable	Noted.
74	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	Contact Energy	As mentioned above, Contact considers some of changes to be sensible, however believe that the proposed changes commented on either add complexity for little benefit or aren't required at this point in time.	Noted.

No.	Question	Submitter	Response	Authority response
75a	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	Craftware Computing	Not entirely. Reasons: 1. Re clause 2. The proposed Code change has introduced an additional restriction to metering category of types 1 or 2. Currently, the only restriction on the use of a TR switch type is that it must <u>not</u> be used where the submission type HHR = 'Y' and has an AMI Flag of 'N'. This proposed Code change would need a corresponding Registry software change and would impact traders' systems. 2. Re clause 2(2)(b). As detailed in Q2, the profile code is mandatory in the NT. The word "may" should be changed to "must"; otherwise a software change will be required to the Registry and to participants' systems. The above comments also apply to clause 9.	Noted. The restriction could be handled by validation, however it could also be handled by instruction to staff that initiate switches.
75b			Agree. The Authority will change the proposed Code amendment to incorporate this suggestion.	
76a	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	EDNZ	EDNZ disagrees with proposed code changes. Part 1 of the Code EDNZ strongly opposes part (a) of the new definition proposed for Part1 of the Code. As outlined for 3.3.13 in Q5, if the proposed definition is added to the Code it would require significant change to some traders' processes. Not all traders automatically receive read files for their AMI meters. Schedule 11.3 of the Code EDNZ disagree with proposed code changes – as per our covering letter '1' & '8' – addition of "with cat 1 or cat 2 metering installations" would not be required '2' & '9' – headings need to be consistent with each other Remove '2 (2) (a) (i) ' "a proposed event date" is not required for standard switch '10' proposed changes completely incorrectly written, was: (a) AN (b) CS (c) NW	Agree. The Authority will change the proposed Code amendment by deleting the requirement to use an AMI read but will require that a validated meter read must be used if it is available.
76b			Noted. See response to submission 1, above.	
76c			Agree. The Authority will change the proposed Code amendment to incorporate the suggestion.	
76d			Disagree. This is a current requirement in the registry functional specification.	
76e			Agree, drafting has been amended	

No.	Question	Submitter	Response	Authority response
			With proposed changes: (c) NW (d) CS (i) CS (ii) (A) & (B) AN (ii) (C) CS content	
77	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	Flick Energy	Yes	Noted.
78a	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	Genesis Energy	Genesis Energy has the following comments on the proposed amendments to the Code. Part 1 For the proposed definition of “switch event meter read”, we recommend that the Authority: ☐ delete clause (a), given our comments above² opposing the changes to switch event meter reads for AMI ICPs; and ☐ from clause (b), delete “in relation to an ICP that is not described in paragraph (a)”, given our comments regarding clause (a) and to extend to all ICPs as per question five (tenure of an ICP). Schedule 11.3 In regards to clause 2(2)(a): ☐ sub-clause (i) : we consider the proposed event date should not be compulsory for transfer switches; and ☐ sub-clause (ii): we question whether it is prudent to include actual data code within the Code. We consider that the phrase “the switch type published by the Authority” would be a better option as it future proofs the Code, and is consistent with the approach with other data codes referenced elsewhere in the Code. In regards to clause 4(2), it is still not clear that the clause is removing the requirement to include in the 50 percent switch time criteria, ICPs that have been with the trader less than two months. In regards to clause 9(2)(ii), we again question whether it is prudent to include actual data code within the Code. As suggested above, we consider that the phrase “the switch type published by the Authority”	Disagree. This suggestion does not address a case when at the time of an ICP switch where a gaining trader uses a different method of market and invoice settlement than the losing retailer. This is an existing requirement within the functional specification for switches of type MI. Noted. Any amendment to the registry functional specification or the Code would still require a Code amendment process to be followed. The Authority considers that this is what the clause does say. Noted. Any amendment to the registry functional specification or the Code would still require a Code amendment process to be
78b				
78c				
78d				
78e				

No.	Question	Submitter	Response	Authority response
78f			would be a better option. General comment We disagree with the Authority's assumption that these proposed Code amendments will not cause any significant changes to traders' processes.³ There will be time and cost involved with making changes to traders' billing system configurations and logic, in order to implement the proposed amendments. We estimate that if the Authority incorporates the suggestions we have recommended above, the cost of the changes will be in the range of \$50,000 to \$100,000. However, if the changes are implemented as proposed, the system changes required would be extensive. We estimate that it would cost upwards of \$500,000, and would involve multiple systems and vendors.	followed. Noted. The Authority has decided not to proceed with the requirement to mandate an AMI read at the time of a switch as the costs appear likely to exceed the benefits.
79a	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	Meridian Energy	Schedule 15.2 7(1) of the Code also needs review to ensure alignment with the changes in schedule 11.3 given the relaxed requirement on validated meter reads for short tenure ICPs.	Noted, however clause 7(2) of Schedule 15.2 would apply in these "exceptional circumstances". Participants should still be trying to get meter reads.
79b			Clause 1 of schedule 11.3 references ICPs with metering category 1 or 2 metering installations, this may require a change to refer to a highest metering category of 1 or 2. Clause 8 requires the same clarification.	Agree. Drafting will be amended
79c			Clause 1(2) and 8(2) refer to the Door to Door Sales Act 1967. This has been repealed effective 17 June 2014. The reference should be amended so that it links to the 'uninvited direct sales' provisions that will be included in the Fair Trading Act 1986 from 17 June 2014.	Agree. The Authority will update references in Schedule 11.3 to the Door to Door Sales Act 1967, in light of the Fair Trading Amendment Act 2013.
79d			Although not significantly amended by the proposed changes, clause 4(2) is currently difficult to follow. Meridian understands it is intended to cover the situation when a switch request is withdrawn. Meridian submits that the Authority should take this opportunity to redraft clause 4(2) so that its intent is clearer.	Clause 4(2) makes allowance for instances where either a switch is withdrawn or the customer makes a decision to switch to another retailer within a two month period. The Authority considers that the intent is conveyed within the clause.
79e			Clause 10 numbering needs tidying up.	Noted. However the numbering of subclauses (a) and (b) cannot be deleted. The numbering will stay the same and the provisions will instead show as being revoked.
80	Q6 - Do you agree with the	MRP	No we think no change is needed. See our response at Q 5.	Noted.

No.	Question	Submitter	Response	Authority response
	proposed amendments to the standard and switch move processes in the Code? If not, please provide details			
81	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	Nova Energy	Yes	Noted.
82	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	Powerco	Yes. The proposed Code amendments accurately reflect the proposals detailed in the consultation paper. Powerco supports the introduction of the new defined term to describe the 'switch event' as we consider it simplifies the terminology used and creates greater clarity for participants.	Noted.
83	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	Powershop	Yes	Noted.
84	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	PUNZ	See above (Q5)	See response at submission 75, above.
85	Q6 - Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	WEL Networks	WEL has not fully investigated this but it appears reasonable	Noted.

No.	Question	Submitter	Response	Authority response
86	Q6 – Do you agree with the proposed amendments to the standard and switch move processes in the Code? If not, please provide details	Trustpower	6.1 Yes, we agree, but please note the comments on data quality above in the answer to Question 5.	Noted.
87a	Q7 - Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	Contact Energy	Back dated switches Contact considers that although backdated switches (irrespective of meter type) aren't ideal they cannot be avoided in a number of scenarios. Backdated switches can often cause temporary billing or reconciliation issues. Contact considers backdated HHR switches specifically to be the exception rather than the rule and shouldn't be encouraged within the code.	Noted. However most submitters agree with the proposal and it is considered to be the most effective approach.
87b			Gaining trader provides NHH switch event meter reads options Contact agrees that the process for the gaining retailer to provide switch event readings for NHH devices where the ICP is both ToU and non-ToU is overly complex and low in volume. For this reason Contact considers the status quo should remain and any non-ToU switch event readings should be communicated between Traders outside of the registry.	Agree. The Authority will change the proposed Code amendment to allow the gaining retailer to obtain an interrogation and provide it to the losing retailer.
88a	Q7 - Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	EDNZ	No.	Noted, the Authority had recommended a change to the process name of "Half-hour switching process"
88b			3.4.1 suggest that if the process is redefined and/or renamed would assist with clarifying when each of the process to apply.	
88c			Back dated switches 3.4.6 EDNZ supports option (a), code addition would bring it into line with what is happening in practise	Noted.
88d			Obtaining final metering installation interrogation options 3.4.7 EDNZ supports option (a), code addition would bring it into line with what is happening in practise	Noted.
			Gaining trader provides NHH switch event meter reads options Concern as outlined in covering letter is that without adequate clarification in the Code, Mass Market NHH switches could inadvertently	Noted. The registry will reject an NT file where there is a mismatch between the switch type and registry metering configuration.

No.	Question	Submitter	Response	Authority response
			be able to be switched in this way – without the Losing Traders agreement.	
89	Q7 - Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	Flick Energy	Yes	Noted.
90a	Q7 - Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	Genesis Energy	Back dated switches We agree with the Authority's preferred option outlined in paragraph 3.4.6(a).	Noted.
90b			Obtaining final metering installation interrogation options We disagree with both of the options proposed by the Authority. We consider that a simpler solution (process-wise) would be to mandate that when a gaining retailer arranges to have a meter change, as a result of the switch, that they must send the removed meter details (including final reads/data downloads to the losing retailer, say within three days of receiving the information.	Noted. The Authority will change the proposed Code amendment to incorporate your suggestion, but as an option to the interrogation by the losing retailer or MEP.
90c			Gaining trader provides NHH switch event meter reads options We support the Authority's preferred option of retaining the status quo, if it is combined with our proposal for obtaining final metering installation interrogation options (outlined above). This would ensure that compliance would not be an issue.	Noted.
91a	Q7 - Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	Meridian Energy	Backdating switches – Meridian agrees with the Authority's view of the issue and options. We note in the code drafting that backdating of switching is limited to 90 days before the month in which the switch is notified, if both traders agree. Meridian's view is that the 90 day time limit is unnecessary, that backdating should be allowed as long as both traders agree. This would be useful in the case where a retailer has a contract with a customer with a large number of HHR sites, if one or two sites get missed in the switching process they can then be switched when found without a rule breach. If a time limit is required then the limit should be set to a timeframe that would allow any corrections to flow through the last reconciliation revision cycle. Obtaining final metering installation interrogation – Meridian agrees with the issues and options. A losing retailer or its MEP should be given	Noted, however longer timeframes for backdating information will create issues for settlement and invoicing processes. Noted.

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91b			opportunity to obtain a read before any metering component removal.	Noted. Noted. This was discussed in paragraph 3.3.14 of the consultation paper as a potential option for future consideration.
91c			Gaining trader provides NHH switch event meter reads – Meridian agrees with the issues and options and retaining the status quo. There are only a small number of HHR sites that also have NHH meters.	
91d			In addition to the issues identified in the paper, Meridian would like to discuss whether there is merit in aligning the HHR switching process more closely to the NHH switching process, with the losing trader being the party to confirm the switch. Closer alignment may allow for some automation of HHR switches particularly in uncomplicated cases where there are no metering changes.	
92a	Q7 - Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	MRP	Back dated switches: We agree with amending the code to allow back dated switches to reflect practical requirements. We also support the Authority's preferred option under 3.4.6 (a).	Noted.
92b			Obtaining final metering installation interrogation: We agree with the issue identified and support the Authority's preferred option under 3.4.7 (a).	Noted.
92c			Gaining trader provides NHH switch event meter reads: We agree with the issue identified and support the Authority's preferred option under 3.4.8 (a)	Noted.
93	Q7 - Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	Nova Energy	Yes	Noted.
94	Q7 - Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	Powerco	No comment. As the half hour switch is a trader to trader process, Powerco considers that traders would be in the best position to provide feedback on the proposed amendments.	Noted.
95	Q7 - Do you agree with the	PUNZ	PUNZ again feel that more detail and investigation into the process with traders and MEP's need to be conducted before any changes are made	The consultation paper sets out that boundaries are becoming blurred and that the

No.	Question	Submitter	Response	Authority response
	Authority's view of the issues and options for the half hour switching process? If not, please explain why not?		to the HHR switching process. The current process seems to work well for proper HHR sites and we feel any changes need to be thoroughly mapped out in workshops with both traders and MEP's.	threshold for HHR switching should be set to category 3. This is a change to the threshold, but not the switch process itself.
96	Q7 - Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	WEL Networks	Do not agree that the process of not allowing backdating of switching that is currently being used will generate unreasonable additional costs. This is what is currently occurring and therefore would be part of current costs. Do not agree with the option of allowing for backdating of HHR switching as WEL sees this as a backwards step and will not incentivise efficiency and effectiveness of the process.	Disagree. Most submitters agree that this process is occurring currently and there would be costs associated with changes that prevent this process from occurring.
97	Q7 – Do you agree with the Authority's view of the issues and options for the half hour switching process? If not, please explain why not?	Trustpower	7.1 No. We suggest half-hour switching should relate only to Category 3 meters and above. This would then not impact on half-hour flagged meters and whether submission was half-hour or not.	Disagree. Switching is at the ICP level. In the rare event that an ICP contains both a HHR and a NHH metering installation, only one switch process can be carried out. ICP switching is not carried out by metering installation, it is carried out for all metering installations within an ICP
98	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Contact Energy	Contact considers the renaming of the HHR switching process to be sensible and provides further clarity, however does not believe the code needs to be amended to specifically outline the period in which a backdated HHR switch can take place. There will always be exceptional circumstances where this process may need to occur in which it may not be in the direct control of the participant initiating the switch request. If this rule was to remain in place Contact considers that it should not be translated into a validation in the registry which would restrict participants from initiating HHR switches greater than 90 days in the past.	Noted. It is currently a Code breach to backdate a HHR switch.
99	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Craftware Computing	No	Noted.
100	Q8 - Do you have any comments on the proposed amendments to improve the	EDNZ	As per our covering letter * – if Mass Market and TOU sites were defined, it would be more straightforward to then amend the Code to clarify which switching process applied to each.	Noted. For the submitter's information: Current definition Mass market switches are ICPs that have only NHH metering installations or are AMI.

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	clarity and efficiency of the half-hour switch process?			<i>HHR switches are ICPs where the metering is non AMI HHR, or are NHH and are to become a non AMI HHR metered ICP or are non AMI HHR and are to become a NHH metered ICP</i> Proposed definition <i>Mass market switches are ICPs that have only NHH metering installations or are AMI and have a maximum metering category of 2</i> <i>HHR switches are ICPs where mass market switches do not apply which by definition includes</i>
101	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Flick Energy	No	Noted.
102 a	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Genesis Energy	We have the following comments on the proposed amendments to Schedule 11.3: ☐ clause 13(1A) : This clause has been inserted without any corresponding commentary in the consultation paper. We request that commentary on this amendment is provided before the Authority proceed;	This change was discussed in clause 3.3.12 of the consultation paper.
102 b			☐ clause 14(2) : We support this change as it reflects industry practice and customer expectations; and	Noted.
102 c			☐ clause 16(2): While we support the intent of this amendment, we question how effective it will actually be in practice. Parties can be given the opportunity to interrogate the meter at a site, but if a contractor cannot be arranged to get there on the specified day, the party will still miss the meter read, but the other party will have met their obligation.	Agree. The Authority will change the proposed Code amendment to provide an option that the gaining retailer can provide the interrogation information.
103 a	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Meridian Energy	Clause 13(2) refers to the Door to Door Sales Act 1967. This has been repealed effective 17 June 2014. The reference should be amended so that it links to the 'uninvited direct sales' provisions that will be included in the Fair Trading Act 1986 from 17 June 2014.	Agree. The Authority will update references in Schedule 11.3 to the Door to Door Sales Act 1967, in light of the Fair Trading Amendment Act 2013.
103			Clause 16 of schedule 11.3 states the gaining trader must advise the registry of the actual event date no later than 3 business days after the	Agree. The Authority will change the proposed

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b 103 c			actual event date. With backdated switching allowed under the amendments proposed this clause will be routinely breached as actual event dates can be more than 90 days in the past. Clause 16 (2) should be separated out to its own clause as it is about providing an opportunity to interrogate a meter and is unrelated to advising the registry.	Code amendment to ensure there is appropriate alignment between relevant Code clauses. Agree. The Authority will change the heading in the proposed Code amendment.
104	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Metrix	As no obligation is being placed on an MEP when ICPs are de-energised or metering equipment removed, and as operational procedures already exist which allow this activity, Metrix does not agree with adding "or the MEP" to Clause 16(2) of Schedule 11.3	Disagree. The clause places an obligation on a trader to provide an opportunity for a losing trader or an MEP to obtain a reading. The Authority will change the proposed Code amendments to provide an option that the gaining retailer can provide the interrogation information.
105	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	MRP	We support the Authorities proposed amendments for clauses 13 to 16 of schedule 11.3.	Noted.
106	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Nova Energy	No	Noted.
107	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Powerco	No. We have reviewed the proposed Code amendments and consider that they accurately reflect the proposals in the consultation document.	Noted.
108	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Powershop	No comment.	Noted.
109	Q8 - Do you have any	PUNZ	As per Q7.	Noted.

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	comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?			
110	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	Trustpower	8.1 Clarification is needed for metering flags. This should not impact switching, or impose delays to customer billing and submissions. There is currently no way to determine what is a true TOU site.	Noted. The new version of the registry provides the same summary information as was provided in the previous version. Information displayed focussed on whether a special arrangement was necessary to obtain a meter read. However, the Authority accepts that technology and practice has evolved. Business rules and mock up screens have been prepared to show additional summary screen fields and will be consulted on separately. These fields will indicate the following using business rules: a) AMI communicating meter b) AMI non communicating meter c) Non AMI NHH meter d) C&I TOU meter. Note that participants could also build these business rules into their own back office systems. Amending the registry and requiring MEPs to indicate meters capable of remote communications would entail considerable cost.
111	Q8 - Do you have any comments on the proposed amendments to improve the clarity and efficiency of the half-hour switch process?	WEL Networks	As referred to in Q7 WEL does not agree with the proposal to allow for the backdating of switching for HHR sites and these should continue to be dealt with as they currently are.	Noted. However HHR switches are currently being backdated without significant issues to market processes.
112	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	Contact Energy	As mentioned in above sections, Contact considers a number of the proposed changes to be sensible, however some of the changes do not seem to provide significant benefit for the cost involved in changing systems or processes. While the assessment of costs looks reasonable from an industry	Please refer to the response to the specific submission points, above.

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			perspective it does not take into account the individual costs of each participant having to enhance internal systems should these changes come into effect. Contact would consider a number of the changes to be large in complexity and resulting cost to implement.	
113 a	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	Craftware Computing	Not entirely. Reasons: There will be increased costs for the changes to the Registry and traders' systems as a result of introducing metering category types into the validation for the use of the TR and MI switch types in the NT.	This would occur if traders wished to build validation into their systems. Traders may elect to require their call centres to use the appropriate switch type, which is how many traders may differentiate at this time between mass market and half hour switches. It is not proposed to add switch validation to the registry.
113 b			There will be additional cost for our recommended changes to the trader event maintenance functions in the Registry to keep the profile codes and submission types aligned.	Noted. However these costs are relatively modest and would not impact on the overall assessment.
114	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	EDNZ	No "4.6.8 (b) participants may incur small additional costs in complying with the proposed Code amendment" is a completely incorrect statement – see response to Q6.	Refer to the response to submission comment 76, above.
115	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	Flick Energy	Yes	Noted.
116 a	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	Genesis Energy	We have the following comments on the Authority's regulatory statement: ☐ paragraph 4.3.2: In regards to costs for participants, we refer the Authority to the expected costs we outlined in question six;	Refer to the response to submission comment 78, above.
116 b			☐ paragraph 4.6.4: We are uncertain that the extent of issues surrounding obtaining final metering installation reads within HHR switching are such that making a change shows any clear efficiency gains or resolves any material regulatory failure. We suspect the proposed solution will add complexity (through additional process steps)	Noted. Given that AMI information may be delivered daily, or is accessible daily, to a number of traders, the issue may be one of system architecture. Where an ICP moves

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116 c			for questionable gains. Whereas, ICP days is an area where there is a clear failing, as evidenced by the number of volume disputes over recent months (as a result of ICP days scaling), but the Authority has not proposed a solution. Addressing this issue by removing ICP days from the allocation process and leaving as a KPI report only would lead to clear efficiency gains in the allocation process, and potentially for traders.	from a losing trader using NHH submission type, to a gaining trader using HHR submission type (or vice versa) there is a potential for electricity to be over or under counted resulting in an unintended impact on consumer invoicing. This mismatch will occur due to inaccuracy of the estimated NHH accumulated register read and the actual NHH accumulated meter read that would correspond to the change of settlement from NHH to HHR by the gaining trader. Disagree. The application of ICP days scaling is not evidence of the Code or a process failure. The volume disputes were created by a) accuracy of participant population of the registry, and b) accuracy of the data used by the registry to generate ICP days reports for the reconciliation manager
117	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	Meridian Energy	Meridian agrees that the only visible upfront costs are in relation to the registry changes required to automatically update the submission type field. Meridian agrees improved clarity on the switching process and reducing the number of exceptions and errors in switching and reconciliation lead to greater efficiency. This is why Meridian supports further work to resolve the issues not addressed by this consultation paper before the changes to schedule 11.3 are finalised.	Noted. The Authority has recorded the additional issues mentioned for consideration in any relevant, future project.
118	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	MRP	We have no information which conflicts with the Authority's assessment of costs or benefits.	Noted.
119	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	Nova Energy	Yes	Noted.

No.	Question	Submitter	Response	Authority response
120	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	Powerco	Powerco agrees that the stated benefits associated with the proposed amendments outweigh the costs, but considers that the costs have been understated for the reasons explained in our response to Question 1 above. The recent increase in errors relating to updating registry fields that have led to volume and invoice disputes has resulted in a significant increase in costs to us due to the re-work and manual work required by our systems to deal with these errors.	Please refer to the response to submission comment 5c, above.
121	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	Powershop	Yes	Noted.
122	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	PUNZ	PUNZ agree with the assessment costs set out.	Noted.
123	Q9 - Do you agree with the Authority's Regulatory statement and assessment of costs? If not, please explain why not?	WEL Networks	WEL would incur additional costs if the proposal to allow for backdated HHR switching is implemented. This additional cost could then be passed onto our customers.	Noted, however the issue of backdating of HHR switches occurs currently. The Code amendment recognises that the backdating does not cause any related market issues