# Decisions and reasons paper

## Switch process re-engineering – Review of Schedule 11.3

16 June 2014

Market Services

## Executive summary

In December 2013 the Authority published a consultation paper proposing a set of changes to the ICP switching obligations contained in Part 11 of the Electricity Industry Participation Code 2010 (Code), related changes to Parts 1 and 15 of the Code, and amendments to the registry functional specification.

The consultation paper proposed a number of amendments to the processes set out in Schedule 11.3 of the Code, which were designed to facilitate the efficient switching of half hour (HHR) advanced metering infrastructure (AMI) metering installations, as well as some legacy issues that had been noted.

Most of the issues canvassed in the consultation were also discussed at a workshop by an ad hoc technical group called together by the Authority to discuss aligning the Code with workable market practices.

This paper summarises the submissions received, the Authority's response to those submissions, and the Authority's decisions on the consultation.

# Contents

# 1 Background

1.1 Part 11 of the Code regulates certain market activities related to the operation of the electricity registry that have a significant effect on the efficiency of market transactions. It also regulates the transfer of customers between traders.

1.2 The customer switching process, set out in Schedule 11.3, is complex, highly operational, and affects all traders' processes and systems. This customer switching process works particularly well, with the switching period in New Zealand being amongst the shortest in the world.

1.3 During the implementing of new Part 10 and associated amendments to Parts 1, 11, and 15 (new metering rules), Genesis Energy Limited (Genesis) identified that switching a customer between traders was difficult and often required manual intervention of automatic processes where a customer's site was:

(a) metered by a half-hour (HHR) certified advanced metering infrastructure (AMI) metering installation

(b) reconciled as HHR (rather than non-half hour) by the losing trader.

1.4 To overcome the issue that Genesis identified, the Authority amended the switching process set out in Schedule 11.3 of the Code, and produced a new switching file for participants to interface with the registry. The amendments to the switching process were intended to ensure that a trader's choice of metering or settlement did not constrain the customer's choice of retailer.

1.5 When the Authority amended the switching process, it stated its intention to review the HHR customer switching process after the new metering rules came into effect. This was to ensure that the amendments to the customer switching process were working as intended, and also to give participants some experience with switching HHR advanced metering infrastructure (AMI) metering installations before the Authority carried out the review.

1.6 The Authority reviewed the HHR switching process, and discussed issues with an ad hoc technical group that it had called together to discuss how the Code could be aligned with workable market practices. The outcomes of the technical group discussion fed into the development of a set of proposed Code amendments.

1.7 The new metering rules appear to be working effectively since coming into force on 29 August 2013, with only minor changes to the switching process required.

1.8 In December 2013, the Authority published a consultation paper "*Switch process re-engineering – Review of Schedule 11.3*" (consultation paper) that proposed a set of changes to the ICP switching process contained in Part 11 of the Code and to the registry's functionality specification.

# 2 Submission overview

2.1 The Authority received 14 submissions on the consultation paper. This paper summarises the Authority's decisions on the proposed Code and registry functional specification amendments set out in the consultation paper. The Authority has also prepared a more detailed summary of the submissions, which is available at: http://www.ea.govt.nz/development/work-programme/retail/switch-re-engineering/consultations/#c8145

2.2 The Authority received submissions from:

(a) Contact Energy Limited (Contact): retailer, generator, and metering equipment provider (MEP)

(b) Craftware Computing Limited: consultant

(c) Energy Direct NZ Limited (Energy Direct): retailer

(d) Flick Energy Limited: retailer

(e) Genesis: retailer and generator

(f) Meridian Energy Limited (Meridian): retailer and generator

(g) Metrix Limited (Metrix): MEP

(h) Mighty River Power Limited (MRP): retailer, generator, and MEP

(i) Nova Energy Limited: retailer, generator, and MEP

(j) Powerco Limited: distributor

(k) Powershop New Zealand Limited: retailer

(l) Pulse Utilities New Zealand Limited (Pulse): retailer and MEP

(m) Trustpower Limited: retailer, generator, and MEP

(n) WEL Networks Limited (WEL): distributor.

2.3 The submissions are available on the Authority's website at http://www.ea.govt.nz/development/work-programme/retail/switch-re-engineering/consultations/#c8145.

2.4 The Authority also received submissions on items that were not consulted on. Consequently this paper details:

(a) the Authority's decisions for the items consulted on, set out in section 3 below

(b) the Authority's decisions for the items not consulted on, but included in submissions, set out in section 4 below

(c) the final Code amendments, incorporating the feedback received in submissions, set out in Appendix A.

# 3 Authority decisions for the issues consulted on

3.1 After reviewing the submissions, the Authority has decided to proceed with most of the proposed amendments, to modify some of the proposals, and to not proceed with some of the proposals at this time.

3.2 The Authority consulted on a large number of issues. Each issue is noted below with a reference to the consultation paper and to the Authority's decision. The consultation paper is located at http://www.ea.govt.nz/dmsdocument/17103.

**Changes to the operation of the "Submission type" field**

3.3 Refer to section 3.1 of the consultation paper.

3.4 ***Issue identified*** - The registry includes two fields that define how electricity is traded on an ICP: submission type and profile code. These fields are often misaligned as a result of errors during ICP switching when the trader changes one field but not the other. The misalignment can also occur when a trader updates registry information about an existing customer. However, the majority of issues appear to occur at the time of a switch. The result of the misalignment of these two registry fields is that the reconciliation manager applies a penalty to the trader's purchases from the clearing manager via a mechanism known as "ICP days scaling".

3.5 ICP days scaling has been part of the reconciliation process since 1 May 2008. However, it has become problematic since HHR AMI settlements were introduced, as many traders' systems do not include the required functionality to align the submission type field with the profile code field during the switch process. However, the same traders do appear to be capable of maintaining the profile code field.

3.6 ***Authority proposal*** - The consultation paper discussed two options for addressing this issue. One was a Code amendment to remove ICP days scaling, the other was to amend the registry functional specifications to automatically align trader information at the time of a switch. The change to the functional specification would not require a Code amendment, and was the Authority's preferred option.

3.7 Under the Authority's preferred option, traders would remain responsible for any inaccurate profile codes they provide to the registry, and for the accuracy of any subsequent changes to their registry records. Most submitters agreed with this proposal.

3.8 The alignment of submission type fields and profile code fields would provide the following combinations in the registry fields submitted in the switch notification file the trader provides to the registry (NT file):

(a) for an NT file submitted with the profile code of HHR only, submission type NHH = "N", submission type of HHR = "Y"

(b) for an NT file submitted with the profile code of any NHH profile, submission type NHH = "Y", submission type of HHR = "N"

(c) for an NT file submitted with profile code of HHR and any NHH profile code, submission type NHH = "Y", submission type of HHR = "Y".

3.9 ***Submissions received*** – The majority of submitters supported the Authority's preferred option. Several submitters recommended the Authority also remove the ICP days scaling process from the reconciliation process in addition to the functional specification change (i.e. the Authority should pursue both of the proposed options).

3.10 ***Authority decision*** - The Authority has decided to proceed with the proposal to amend the registry functionality. This will assist traders to ensure that the necessary alignment of information is automatically achieved at the time of a switch. The NT file currently allows the trader to notify a change to profile codes on an ICP when the switch completes, but if the functional specifications are amended, the registry will then automatically adjust the submission type flag according to those profile codes. This change does not require a Code amendment. The Authority does not support removing ICP days scaling because the scaling process provides a commercial incentive for participants to ensure that their registry records are accurate at all times.

3.11 Once the Authority has amended the registry functionality, a gaining trader will still need to ensure that these fields are aligned after completing an ICP switch, otherwise ICP days scaling will result.

**Switch event meter reading**

3.12 Refer to section 3.2 of the consultation paper.

3.13 ***Issue identified*** - If the final information required to complete an ICP switch requires there to be a meter reading, there is a conflict between Parts 11 and 15 of the Code as to when final information for a switch should apply. This has created confusion for some participants.

3.14 When an ICP transfers from one trader to another, the losing trader establishes a switch event date. The registry transitions the ICP to the gaining trader on the notified switch event day, and the switch event meter reading should be obtained on the day of the switch event.

3.15 However, clause 6 of Schedule 15.2 states that, for NHH meter readings, the reading does not apply until the following day.

3.16 ***Authority proposal*** - The Authority proposed to amend clause 6 of Schedule 15.2 of the Code to clarify the date and time that a switch event meter reading applies.

3.17 ***Submissions received*** - Most submitters supported the Authority's preferred option. Genesis did not support this option, and noted that:

> *"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."*

3.18 ***Authority decision*** - The Authority, while agreeing that the issue is one of understanding by some participants, considers that the proposed Code amendment clarifies the intent of the Code.

3.19 The Authority has decided to amend the Code in accordance with the consultation proposal.

**Multiple metering types on an ICP**

3.20 Refer to clauses 3.3.4 and 3.3.5 of the consultation paper.

3.21 ***Issue identified*** - The type of metering installation/s and how a trader uses that metering installation to retail to a customer determines the switch process that must be applied. Where an ICP contains both HHR and NHH metering installations, the Code is not clear on what switch process applies.

3.22 ***Authority proposal*** - The Authority proposed to clarify the Code to remove uncertainty on how to handle switches when there is a combination of HHR and NHH metering components within an ICP by requiring the switch process to be based on the highest metering category on an ICP.

3.23 ***Submissions received*** - Although most submitters supported the Authority's preferred option, Meridian commented:

*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.*

3.24 The Authority agreed that this change is necessary, and noted that the clause also needed to refer to unmetered load and category 9 metering installations to deliver the intent described, and has amended the drafting.

3.25 Contact commented that:

*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.*

3.26 The Authority notes that the switching process set out in the amendments to clause 1 and clause 8 delivers this outcome. For all other switches, traders should use the switch type code of HH.

3.27 MRP commented that:

*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.*

3.28 ***Authority decision*** - The Authority notes there may always be some ICPs that have both NHH and HHR metering installations. While there are not a large number of these ICPs, the Code needs to be clear as to which switching process should be followed. The proposed Code amendment will require the switching process for the ICP to follow the current HHR switching process where there are both NHH and HHR metering installations on the same ICP. Traders should ensure they can follow the switch process before entering the switch and, if their systems will not handle the combination of metering installations, follow a manual process on the registry web browser screens.

3.29 The Authority has decided to amend the Code in accordance with the consultation proposal and to incorporate Meridian's suggested drafting recommendation.

**Final information**

3.30 Refer to clauses 3.3.6 and 3.3.7 of the consultation paper.

3.31 ***Issue identified*** - The Code requires meter readings are provided within the switch completion file for those channels within an ICP recorded in the registry with an "accumulator type" = "C" and "settlement indicator" = "Y".

3.32 ***Authority proposal*** - The Authority proposed that the Code should explicitly state which switch meter readings are required. The Authority considered there were two options, and these were to either add an obligation to the Code specifying the final information that must be provided in the switch completion file, or retain the status quo.

3.33 The Authority noted that all traders' systems should currently meet the existing registry functionality requirements, and proposed that the Code should explicitly state the channels for which switch event meter readings are required.

3.34 ***Submissions received*** - Most submitters supported the Authority's preferred option. However, Mighty River Power commented:

3.35 *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.* The Authority notes that clauses 3.3.4 and 3.3.5 of the consultation paper discusses this issue. The current 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.

3.36 Note that for any channel within the ICP that records absolute information, such as HHR, the registry will record a configuration of accumulator type = A and the settlement indicator = N. Switch event meter reads are not necessary for those channels. However for any channel within the ICP where the accumulator type = C and the settlement indicator = Y, a switch event meter reading is required

***Authority decision*** - The Authority has decided to amend the Code in accordance with the consultation proposal.

**Tenure of an ICP**

3.37 Refer to clauses 3.3.8 to 3.3.10 of the consultation paper.

3.38 ***Issue identified*** - Where an ICP has a legacy NHH meter, and the losing trader in an ICP switch has been the trader for the ICP for only a relatively short time, it may not have been able to obtain an actual meter reading. This could be due to factors such as the customer not allowing access or a scheduled reading not occurring within the tenure period. The Authority noted that this issue should not occur with remotely readable AMI meters.

3.39 The Code requires losing traders to obtain an actual meter reading in order to provide final information to complete the switch. For non-AMI metered ICPs, this requires the losing trader to carry out a special meter reading. The cost of a special reading is relatively high, and these costs are passed to consumers with little or no benefit.

3.40 ***Authority proposal*** - The Authority proposed amending the Code requirement for switches where the losing trader's tenure of an ICP that does not have an AMI meter is less than three months, and discussed two options. The options were to:

(a) allow, under certain circumstances, estimates to be used for switch meter readings (this was the Authority's preferred option); or

(b) retain the status quo and require all traders to comply with the Code requirements for switch meter readings to provide final information to complete a switch.

3.41 ***Submissions received*** - Most submitters supported the Authority's preferred option.

3.42 MRP commented that:

> *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'.*

3.43 The Authority considers that six months is too long a time period, and could pass excessive risk to the gaining trader in a switch.

3.44 Meridian commented that:

> *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.*

3.45 ***Authority decision*** - The Authority considered that the issue Meridian raised was rare, and it was not practical to create Code that would provide an effective solution to that issue. The Authority agrees that, as AMI

becomes more prevalent, the problem will diminish. The Authority also notes that traders can:

(a) determine if an ICP has been switching in such a pattern prior to gaining the ICP

(b) under their terms and conditions with the customer, and as part of its customer management policies, insist on gaining access to obtain an actual meter reading.

3.46 The Authority has decided to amend the Code in accordance with the consultation proposal.

**Metering category**

3.47 Refer to clauses 3.3.11 to 3.3.12 of the consultation paper.

3.48 ***Issue identified*** - The Authority noted that:

(a) the metering rules, since their inception, provided that traders could automatically process mass market switches in their systems. Traders use the standard switching process and the switch move process for mass market ICP switching

(b) a separate process should handle larger sites, which pose significant risk to a trader, and sites with special invoicing configurations. Historically larger sites all had HHR metering and traders manually handled switching ICPs for these sites

(c) as metering technology evolves and accuracy improves, a MEP may choose to use AMI meters in category 3 metering installations. The existing Code provisions allow ICPs with AMI meters to switch via the standard switching process and the switch move process, rather than the manual process that would otherwise apply.

3.49 ***Authority proposal*** - The Authority proposed to amend the Code to require ICPs with:

(a) category 1 or category 2 metering installations to follow the standard switching process (switch type of TR) or the move in switch process (switch type of MI)

(b) category 3 to 5 metering installations to follow the half-hour switching process (switch type of HH)

provided that:

(c) a metering installation at the ICP is not subject to a change of metering installation type, as outlined in clause 13 of Schedule 11.3 of the Code

(d) all other ICP switches, where the metering installation is category 3 or higher, must follow the process outlined in clause 13 of Schedule 11.3 of the Code.

3.50 ***Submissions received*** - Those submitters that commented on this issue supported the Authority's preferred option.

3.51 ***Authority decision*** - The Authority has decided to amend the Code in accordance with the consultation proposal.

**Switch event meter reading for AMI ICPs**

3.52 Refer to clause 3.3.13 of the consultation paper.

3.53 ***Issue identified*** – Where NHH accumulating register meters are used in the settlement and invoicing process, a meter reading is required in order to end the settlement and invoicing of the losing trader, and start the settlement and invoicing of the gaining trader. The meter reading at the time of a switch is known as the NHH switch event meter reading.

3.54 The Code requires both the losing and gaining traders to use the same NHH switch event meter reading so that customers are not under or over-invoiced when they switch traders and electricity market settlements are accurate.

3.55 Most losing traders currently create estimates for NHH switch event meter readings based on the consumer's past consumption history regardless of whether an actual AMI meter reading is available from the MEP or within their own systems.

3.56 To all intents and purposes, as long as the same NHH switch event meter reading is used by the losing and gaining trader, settlement and invoicing is accurate.

3.57 However, AMI metering installations may be settled using HHR data, and a gaining trader may change the type of settlement at the time of switch from NHH to HHR. If the NHH switch event meter reading provided by the losing trader is an estimate, it may not align exactly to the date and time that the gaining trader commences using HHR settlement. The misalignment of these meter readings may generate an inaccuracy with invoicing or market settlement.

3.58 Where a misalignment occurs, currently the gaining trader must:

(a) determine whether the estimated meter reading from the losing trader matches the HHR data they receive from the metering equipment provider (MEP)

(b) manually intervene in the automated processing of meter data if there is a mismatch.

3.59 ***Authority proposal*** - The Authority proposed a Code amendment to require traders to use an actual meter reading as the switch event meter reading where the metering for an ICP is AMI.

3.60 ***Submissions received*** - A number of submitters disagreed with the proposed requirement for an actual AMI reading to be used. Only Genesis noted estimated costs for providing the required functionality. Contact noted there could be considerable system development required for a number of traders.

3.61 Energy Direct noted:

*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.*

3.62 Genesis noted:

*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 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.*

3.63 Meridian noted:

*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.*

3.64 Contact noted:

*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.*

3.65 The main reasons for this disagreement are:

(a) The processes and systems that traders use for switching ICPs can only obtain meter readings from modules used for invoicing. Changes to participant systems or their contracts with MEPs would be necessary to implement the Code recommendations as

(i) in some cases traders receive daily meter readings from MEPs, however these meter readings are located in a separate database to that used for invoicing or

(ii) in some cases traders choose not to receive daily meter readings from MEPs but receive weekly or monthly meter readings or

(iii) in some cases traders choose to manually read AMI meters and receive no meter readings from MEPs.

(d) The cost of changing participants' systems, so that daily AMI meter readings is available for ICP switching purposes, would significantly outweigh the benefit that could be attained

(e) it appears that there may be delays in obtaining AMI readings in a timely manner. This is a technology maturity issue that MEPs will in time overcome, but for some customers the proposal could delay switching between traders if it was implemented at this time.

3.66 ***Authority decision*** - In drafting the proposal, the Authority had considered that as AMI readings are available daily, traders could use those daily meter readings in the switch process.

3.67 As a consequence of the submissions received, the Authority has decided not to proceed with the proposed amendment at this time. The Authority has instead decided to:

(a) amend the proposed definition of 'switch event meter reading' to replace the proposal with a requirement for the losing trader to use a validated meter reading, if one is available. If one is not available, then the losing trader may use an estimate. The Authority notes that participants should already be doing this as a matter of good practice

(b) examine in more detail whether there are lower cost alternatives to align switch event meter readings with the start of HHR settlement.

**Further issues with the standard switching and switch move processes for future consideration**

3.68 Refer to clauses 3.3.14 to 3.3.18 of the consultation paper.

3.69 ***Issue identified*** - The Authority did not propose a Code amendment but sought participants' views on future changes to the switching process and noted in the consultation paper "*Accordingly, the Authority does not intend to amend the Code or the registry functional specification to include these issues, but welcomes participants' views as to their relative merits and priority*".

3.70 ***Authority proposal*** - The Authority sought feedback from participants on two items as follows:

(a) Participant that completes a standard or move in switch: the consultation paper discussed that the Code does not allow a gaining trader to complete a switch of an ICP between traders using the standard switch process or the switch move process. The options discussed were:

(i) the gaining retailer could have the option of completing switches; or

(ii) the status quo where only the losing trader could complete switches (Authority's preferred option)

(b) Participant who provides the switch event meter reading for an ICP with only AMI meters: the consultation paper discussed that MEPs are not currently involved in the switching process. However MEPs could provide switch event meter readings directly to the registry instead of to the losing trader where the metering at an ICP was AMI. The options discussed were:

(i) where AMI meters are the only meter type on an ICP, the MEP could provide the switch event meter readings; or

(ii) the status quo where only the losing trader provides switch event meter readings (Authority's preferred option)

3.71 Submissions received – Few participants responded directly to the question. However Metrix commented as follows:

*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.*

*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.*

3.72 ***Authority decision*** - In both cases that a view was requested, the status quo remains. The Authority had not intended to regulate at this point, but to obtain participants' views.

3.73 The Authority notes that the implementation of either of these discussion points would require significant industry consultation, and considerable change to participants' systems.

**Back dated switches**

3.74 Refer to clause 3.4.6 of the consultation paper.

3.75 ***Issue identified*** - While the Code does not allow for switches to be backdated, participants often choose to backdate switches for larger sites when customers delay completion of the final agreement for a contract to supply electricity.[1]

[1] The customer has agreed to switch, takes some time to complete the relevant paperwork, but still expects the contract to commence from the date the switch was agreed.

3.76 ***Authority proposal*** - The Authority considered that there are no electricity market problems evident with backdating HHR switching, and proposed Code amendments to allow backdating. The proposed Code amendment allowed the switch event date to be:

(a) a date in the same month as the gaining trader advises the registry of the expected event date; or

(b) a date in the 90 days before the month in which the gaining trader advises the registry of the expected event date provided that the losing trader and the gaining trader agree.

3.77 ***Submissions received*** – Most submitters agreed that backdated HHR switches were common practice and agreed with the proposed Code amendment.

3.78 Contact commented:

*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.*

3.79 WEL disagreed with the proposal and commented as follows:

*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.*

3.80 ***Authority decision*** - Most submitters agreed that HHR switches must sometimes be backdated, and caused no significant industry problems. The Authority also notes that:

(a) the Code amendment proposal only allows backdating to occur within the current month unless both the gaining and losing trader agrees. The Authority expects there would be few HHR switches backdated beyond the current month

(b) 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.

3.81 The Authority has decided to amend the Code in accordance with the consultation proposal.

**Obtaining final metering installation interrogation options**

3.82 Refer to clause 3.4.7 of the consultation paper.

3.83 ***Issue identified -*** The completion of the switch file can enable the switching of ICPs that also contain NHH meters. A losing trader may be

unaware of a switch involving a change to a metering installation being carried out in accordance with clause 13 of Schedule 11.3. The losing trader requires a final interrogation of the metering installation to accurately complete invoicing the customer, and to complete the switch.

3.84 When the gaining trader becomes aware of the change to the metering installation, it may be too late or very difficult for the losing trader to obtain a final interrogation of the metering installation.

3.85 ***Authority proposal*** - The Authority proposed a Code amendment to allow a losing trader, or that trader's MEP, the opportunity to interrogate a metering installation prior to any component removal.

3.86 The Authority's preferred option was to amend the Code to add an obligation for the gaining trader to provide the losing trader or the losing MEP the opportunity to obtain an interrogation before the metering installation was removed.

3.87 ***Submissions received*** - Most submitters that responded to this proposal supported the proposed amendment.

3.88 Genesis commented:

> *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.*

3.89 The Authority agrees with Genesis that it may be more efficient for a gaining retailer to obtain a metering installation interrogation. The critical issue is that a final interrogation is actually carried out and communicated to the losing trader, who requires the information for invoicing and switching purposes. The Authority notes that in some circumstances the gaining trader or MEP may not be able to obtain an interrogation. In these instances there still needs to be a means of ensuring that the losing trader or losing MEP has the opportunity to obtain a final interrogation before or when equipment is being removed.

3.90 Meridian commented:

> *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.*

3.91 The Authority agreed with Meridian, and has changed the heading of the clause to reflect the content.

3.92 Meridian also commented:

> *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.*

3.93 The Authority agreed with Meridian that finding a solution to ensure final reads from removed meters is important, and notes that this issue is covered under the Code amendment proposal.

3.94 Metrix commented:

*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*

3.95 The Authority disagrees with Metrix. An obligation is placed on the gaining trader to arrange for the losing trader or the MEP to carry out the final read.

3.96 ***Authority decision*** - The Authority considers it is necessary for the Code to require a trader to obtain an interrogation, but agrees the gaining trader could provide the interrogation instead of requiring the losing trader to obtain an interrogation. The Authority has modified the proposed Code amendment to allow either the gaining trader to provide an interrogation to the losing trader, or the losing trader or MEP to obtain an interrogation themselves.

3.97 The Authority has amended the proposed drafting for clause 16 of Schedule 11.3 as follows:

(a) insert wording to allow either a gaining trader to provide a meter reading from an interrogation, or to provide the losing trader or MEP with an opportunity to obtain their own meter reading from an interrogation

(b) change the title of the clause to reflect the change to the clause.

**Gaining trader provides NHH switch event meter reads options**

3.98 Refer to clauses 3.4.5 and 3.4.8 of the consultation paper.

3.99 ***Issue identified*** – In the case of the switch of an ICP using the HHR switch process, the Code is silent on the requirement to provide a switch read for any NHH metering installations within the ICP. The Code could require that, where this event occurs, the gaining trader must provide an NHH switch event meter reading in the switch completion message (CS file).

3.100 ***Authority proposal*** - The consultation paper sought participants' views on the issue, and whether they agreed with retaining the status quo. The consultation paper did not propose a Code amendment. The Authority's preferred option was to retain the status quo rather than amend the Code.

3.101 The discussion proposal was to allow the gaining trader in an NHH switch (switch types MI or TR) to have an option to provide the NHH switch event meter readings to complete the switch. The registry could support this functionality if required.

3.102 The Authority's view expressed in the consultation paper was that amending the process would introduce complexity and may not provide a benefit to customers.

3.103 ***Submissions received*** – This item was a discussion point only. Few participants supported the discussion proposal.

3.104 Contact commented:

> *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.*

3.105 Meridian commented:

> *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.*

3.106 Trustpower commented:

> *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.*

3.107 In respect of the Trustpower submission, the Authority notes that ICP switching is not carried out for a metering installation, it is carried out for all metering installations within an ICP.

3.108 Most submitters agreed with the Authority's preferred option of retaining the status quo.

3.109 ***Authority decision*** - The Authority has decided not to proceed with developing a Code amendment or further investigation at this time. However, if it becomes evident that ICP switches are being delayed unnecessarily due to delays within the losing trader or inaccurate switch event meter reads, the Authority may review these options again.

**Rename the half hour switch process**

3.110 Refer to clauses 3.4.10 to 3.4.12 of the consultation paper.

3.111 ***Authority proposal*** - The Authority proposed renaming the half-hour switch process as the "Gaining trader completes switching process", as this wording more accurately reflects the normal switching process.

3.112 ***Submissions received*** - No direct submissions were noted on the question.

3.113 ***Authority decision*** - The Authority has decided to proceed with this proposed Code amendment.

# 4 Authority decisions for the issues raised in submissions that were not consulted on

4.1 A number of submissions discussed issues that were not specifically related to the proposals in the consultation paper.

### MEPs slow to update registry metering information

4.2 A number of submitters noted that MEPs can create delays to customer switching by delaying the initial population or correction of metering information in the registry.

4.3 The Authority reminds participants that if an MEP fails to meet its Code obligations to initially populate or maintain registry metering records, or to correct registry metering records, that the MEP is breaching Schedule 11.4 of the Code. Regulation 8(1) (Mandatory reporting of other breaches) of the Electricity Industry (Enforcement) Regulations 2010 provides that an "industry participant that believes, on reasonable grounds, that another industry participant has breached the Code must report the breach or possible breach to the Authority as soon as possible".

4.4 The Authority does not consider it needs to consider this issue further at this stage, but will reconsider this position if it is warranted in the future.

### Summary metering information available for ICPs

4.5 A number of submitters noted that the registry should include more detailed summary metering information. This would enable their customer services staff to determine if a site has:

(a) a non-communicating AMI meter; or

(b) a legacy meter that is not an AMI meter; or

(c) a Commercial/Industrial (C&I) time of use (TOU) meter.

4.6 The registry summary metering information currently indicates:

(a) if there is an NHH certified metering installation at the ICP

(b) if there is an HHR certified metering installation at the ICP

(c) if there is an AMI communicating NHH certified metering installation at the ICP

(d) if there is an AMI communicating HHR certified metering installation at the ICP

(e) if there is a prepay metering installation at the ICP

(f) if a multiplier is required to determine volume information from a metering installation

(g) the total number of settlement channels at the ICP

(h) the highest metering category of a metering installation at the ICP

(i) the device identifiers and register content codes at the ICP.

4.7 The Authority:

(a) notes that participants can determine the additional information they are seeking from an appropriate interpretation of information already available within the registry

(b) accepts that not all registry users may have sufficient knowledge to accurately determine the information in the registry

(c) considers that the presentation of information could easily be simplified, which:

(i) would be an efficiency improvement for the industry

(ii) would ensure that customers receive correct advice

(d) will separately propose an amendment to registry functionality to provide the following additional information:

(i) if there is a legacy NHH certified metering installation at the ICP

(ii) if there is a C&I TOU certified metering installation at the ICP

(iii) if there is an AMI non-communicating NHH certified metering installation at the ICP

(iv) if there is an AMI non-communicating HHR certified metering installation at the ICP

(v) if there is an AMI communicating NHH certified metering installation at the ICP

(vi) if there is an AMI communicating HHR certified metering installation at the ICP

(vii) if there is a prepay metering installation at the ICP

(viii) if a multiplier is required to determine volume information from the metering installation

(ix) the total number of settlement channels at the ICP

(x) the highest metering category of a metering installation at the ICP

(xi) the device identifiers and register content codes at the ICP.

**Both the gaining and losing traders to initiate switch event meter reading change requests**

4.8 Currently only the gaining trader in an ICP switch can initiate a change to a switch event meter reading (RR). One submitter considered that either the gaining or losing trader should be able to initiate the RR process.

4.9 The Authority notes that:

(a) the RR process requires both the gaining and losing trader to agree to a revised switch event meter reading

(b) if a losing trader needs to correct a switch event meter reading, it could obtain the gaining trader's agreement, who could then initiate the RR process.

4.10 The Authority notes that the proposed change would require a Code amendment and industry consultation, and may be considered for a future project if more evidence is presented that there is an issue that needs to be addressed.

### Remove the time limitation on switch withdrawals

4.11 A submitter recommended that the two month limit for backdating switch withdrawals in the registry should be removed, as there are cases where a withdrawal needs to be backdated more than two months. The submitter proposed that these withdrawals be permitted provided that both the gaining and losing traders agree.

4.12 The Authority:

(a) notes that the registry does not impose a time limit on the withdrawal process, whereas the Code does[2]

(b) questions why longer than two months would be required to carry out a switch withdrawal and whether a switch back would be the more appropriate process.

4.13 The Authority notes that this would require a Code amendment and industry consultation, and may be considered for a future project if more evidence is presented that there is an issue that needs to be addressed.

### Alignment of MEP registry metering record population with trader obligations in the Code

4.14 A submitter recommended that the time allowed in the Code for an MEP to update registry metering records should be reduced to align with the Code requirements for trader response times when completing an ICP switch.

4.15 The Code requires an MEP to update registry metering records:

(a) if the MEP is new to an ICP, within 15 business days[3]

(b) if the MEP is already responsible for an ICP, within 10 business days.[4]

4.16 The Authority notes that time periods in the Code are maximums, and not targets. The Authority also notes that the suggested amendment would require a Code amendment and industry consultation, and may be considered for a future project if further evidence is presented that there is an issue that needs to be addressed.

### Consumers should be well informed of planned outages

4.17 A submitter recommended that there is potential for a consumer not to be advised of a network outage if they are within the switch process, and that a broad discussion is warranted on this topic.

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2 Clauses 17 and 18 of Schedule 11.3

3 Clause 2 of Schedule 11.4

4 Clause 3 of Schedule 11.4

4.18 The Authority agrees that under rare circumstances a consumer may not be advised of a network outage if the distributor notifies the losing trader of an outage for an ICP on the day of a switch. The Authority notes that it has previously consulted with participants on a centralised approach, which would address this situation. The outcome of that consultation was noted at the time in the Authority's summary of submissions:

> *Standardised management of service interruption information (Section 4.11): The EA has decided not to proceed with its proposal to investigate a central registry for the recording and reporting of faults. The SDFG will be tasked with developing EIEP5 and EIEP6 further for the purpose of outage management information sharing and the EA will consult separately on these at a separate stage*[5]

4.19 The Authority notes that addressing the submitter's concern would require a Code amendment and industry consultation, and may be considered for a future project if further evidence is presented that there is an issue that needs to be addressed.

**Default volumes imposed in the reconciliation process require review**

4.20 A submitter recommended that the Authority should review the default volumes applied within the reconciliation process for HHR metered mass market AMI ICPs. The current default volumes within the Code used for HHR metered ICPs[6] apply to C&I ICPs, and not mass market ICPs.

4.21 The Authority notes that provided trader registry information and reconciliation manager submission information are aligned, the reconciliation manager will not apply default volumes in the reconciliation process.

4.22 Any change to the application of default volumes would require a change to Part 15 of the Code and industry consultation, and may be considered for a future project if further evidence is presented that there is an issue that needs to be addressed.

**ICP days scaling factor be set to 1.0000, similar to the approach taken for electricity supplied (i.e. scorecard)**

4.23 A submitter recommended that ICP days scaling should be set to 1, i.e. no scaling can be applied if submission information to the reconciliation process may be inaccurate.

4.24 The Authority considers that the scaling process provides a commercial incentive for participants to ensure that their registry records are correct at all times.

4.25 The Authority notes that this would require a Code amendment and industry consultation, and may be considered for a future project if further evidence is presented that there is an issue that needs to be addressed.

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[5] The SDFG is the Standing Data Formats Group, EIEPs are the electricity information exchange protocols and the EA is the Authority.

[6] Clause 7(3) of Schedule 15.4

# Appendix A – Proposed Code amendments after consideration of submissions

## Changes to Part 1

**switch event meter reading**, in relation to a **meter** or **data storage device** that is located at an **ICP** that is being switched under Schedule 11.3, means—

(a) a **validated meter reading**, if one is available; or

(b) a reasonable estimate of the **meter reading** based on the **meter reading** contained in the final information provided in the switch file that the losing **trader** received when it gained the **ICP** if—

(i) a **validated meter reading** is not available; and

(ii) the losing **trader** has been recorded in the **registry** as being responsible for the **ICP** for a period of less than 3 months; or

(c) in every other case, a **permanent estimate**

## Changes to Part 11

### Schedule 11.3
### Switching

*Overview*

**1A Overview of Schedule**

This Schedule prescribes 3 processes for switching **ICPs** as follows:

(a) a standard switch process that applies in the circumstances described in clause 1(1):

(b) a switch move process that applies in the circumstances described in clause 8(1):

(c) a gaining **trader** switch process that applies in the circumstances described in clause 13(1).

*Standard switch~~ing~~ process*

**1 Standard switch~~ing~~ process for ICPs**

(1) A standard switch process applies when~~This clause and clauses 2 to 7 apply if~~ a **trader** (the "gaining **trader**") has an arrangement with a **customer** or **embedded generator** to—

~~(a)~~ commence trading **electricity** with the **customer** or **embedded generator** at, or otherwise assume responsibility under clause 11.18(1) for, an **ICP** at which another **trader** (the "losing **trader**") ~~supplies~~trades **electricity**, and the gaining **trader** switch process under clauses 13 to 16 does not apply.~~the **ICP** is recorded on the **registry** with—~~

~~(i) a submission type of non **half hour**; or~~

~~(ii) a submission type of **half hour** and an AMI flag of Y; or~~

~~(b) assume responsibility under clause 11.18(1) for such an **ICP**~~.

(1A) This clause and clauses 2 to 7 apply to a standard switch process.

(2) If subpart 2 of Part 4A of the Fair Trading Act 1986 ~~the Door to Door Sales Act 1967~~ applies to an arrangement described in subclause (1),—

(a) the gaining **trader** must identify the period within which the **customer** or **embedded generator** may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986 ~~section 7 of the Door to Door Sales Act 1967~~; and

(b) for the purpose of this Schedule, the arrangement is deemed to come into effect on the day after the expiry of the period.

**2 ~~Inform registry of switch request for ICPs~~ Gaining trader advises registry of standard switch request**

(1) For each **ICP** to which a switch relates, the gaining **trader** must advise the **registry** of the switch request no later than 2 **business days** after the arrangement with the **customer** or **embedded generator** comes into effect.

(2) The gaining **trader** must include in its advice to the **registry**—

(a) a proposed **event date**; and

(b) that the switch type is TR; and

(c) 1 or more **profile** codes of a **profile** at the **ICP**.

**3 Losing trader response to standard switch request**

~~Within~~ No later than 3 **business days** after ~~receipt of~~ receiving notification of a switch request from the **registry** ~~in accordance with~~ under clause 22(a), ~~for each **ICP**~~ the losing **trader** must—

(a) ~~provide acknowledgement of~~ acknowledge the switch request by— providing the following information to the **registry**:

(i) ~~providing~~ the ~~expected~~ proposed **event date** ~~to the **registry**~~; and

(ii) ~~if relevant for that **ICP**, providing~~ a valid switch response code approved by the **Authority**~~**market administrator**, to the gaining **trader**~~; or

(b) provide final information to complete the switch request in accordance with clause 5 ~~by—~~

~~(i) providing confirmation of the actual **event date** to the **registry**; and~~

~~(ii) providing to the gaining **trader** confirmation of the actual **event date** and a switch meter read, comprising either the **validated meter reading** or a **permanent estimate**, as at the actual **event date**~~; or

(c) ~~provide a~~ request that ~~for withdrawal of~~ the switch be withdrawn in accordance with clause 17.

**4 Event dates**

(1) The losing **trader** must establish **event dates** under clause 3 so that—

(a) no **event date** is more than 10 **business days** after the date of notification from the **registry** in accordance with clause 22(a); and

(b) in any 12 month period at least 50% of the **event dates** established by the losing **trader** are no more than 5 **business days** after the date of notification.

(2) When ~~calculating~~ establishing an **event date** under this clause, the losing **trader** must disregard every **event date** established by the losing **trader** for a **customer** who, at the time that the **event date** is established, has been a **customer** of the losing **trader** for less than 2 calendar months.

**5 Losing trader must provide final information**

~~If the losing **trader** provides information to the **registry** in accordance with clause 3(a) and 4, then within 3 **business days** after the actual **event date**, the losing **trader** must—~~

~~(a) provide confirmation of the actual **event date** to the **registry**; and~~

~~(b) provide the actual **event date** and either the **validated meter reading** or a **permanent estimate** as at the actual **event date** to the gaining **trader**.~~

No later than 3 **business days** after the **event date**, the losing **trader** must complete the switch by providing final information to the **registry** for the purposes of clause 3(b) and clause 4, including—

(a) the **event date**; and

(b) a **switch event meter reading** as at the **event date** for each **meter** or **data storage device** that is recorded in the **registry** with an accumulator type of C and a settlement indicator of Y; and

(c) if the **switch event meter reading** is not a **validated meter reading**, the date of the last **meter reading** of the **meter** or **data storage device** described in paragraph (b).

**6 Traders must use same reading**

The losing **trader** and the gaining **trader** must both use the same **switch event meter reading** for the **event date** ~~**validated meter reading** or **permanent estimate**~~ as determined by the following procedure:

(a) if the **switch event meter reading** ~~**validated meter reading** or **permanent estimate**~~ provided by the losing **trader** differs by less than 200 kWh from a value established by the gaining **trader**, the gaining **trader** must use the losing **trader's switch event meter reading** ~~**validated meter reading** or **permanent estimate**~~; or

(b) if the **switch event meter reading** ~~**validated meter reading** or **permanent estimate**~~ provided by the losing **trader** differs by 200 kWh or more from a value established by the gaining **trader**, the gaining **trader** may dispute the **switch event meter reading** ~~**validated meter reading** or **permanent estimate**. In this case, the **gaining trader** must, within 4 calendar months of the actual **event date**, provide to the losing **trader** a changed **validated meter reading** or a **permanent estimate** supported by 2 **validated meter readings**, and the losing **trader** must either,—~~

~~(i) within 5 **business days** after receiving the **validated meter readings** or **permanent estimate** from the gaining **trader**, the losing **trader**, if it does not accept the **validated meter readings** or **permanent estimate**, must **notify** the gaining **trader** (giving all relevant details); or~~

~~(ii) if it the losing **trader** notifies its acceptance of the **validated meter readings** or **permanent estimate** received from the gaining **trader**, or does not provide any response, the losing **trader** must use the **validated meter readings** or **permanent estimate** supplied by the gaining **trader** in accordance with this paragraph.~~

**6A Losing trader disputes reading**

If a losing **trader** disputes a **switch event meter reading** under clause 6(b), the **gaining trader** must, no later than 4 months after the **event date**, provide to the losing **trader** a changed **switch event meter reading** supported by 2 **validated meter readings**, and the losing **trader** must either,—

(a) if it does not accept the **switch event meter reading**, advise the gaining **trader** (giving all relevant details) no later than 5 **business days** after receiving the **switch event meter reading** from the gaining **trader**; or

(b) if it notifies its acceptance of the **switch event meter reading** received from the gaining **trader**, or does not provide any response, the losing **trader** must use the **switch event meter reading** supplied by the gaining **trader**.

**7 Disputes**

(1) A losing **trader** or a gaining **trader** may notify the other **trader** that it disputes a **switch event meter reading** ~~**validated meter reading** or **permanent estimate**~~ notified under clauses 1 to 6A.

(2) The dispute must be resolved in accordance with the disputes procedure in clause 15.29 (with all necessary amendments).

*Switch move process*

**8 Switch move process for ICPs**

(1) A switch move process applies when~~This clause and clauses 9 to 12 apply if~~ a **trader** (the "gaining **trader**") has an arrangement with a **customer** or **embedded generator** to—

~~(a)~~ commence trading **electricity** with the **customer** or **embedded generator** at, or otherwise assume responsibility under clause 11.18(1) for, an **ICP** for which no **trader** has an agreement to trade **electricity** and the gaining **trader** switch process under clauses 13 to 16 does not apply. ~~the **ICP** is **ICP** is recorded on the **registry** with—~~

~~(i) a submission type of non **half hour**; or~~

~~(ii) a submission type of **half hour** and an AMI flag of Y; or~~

~~(b) assume responsibility under clause 11.18(1) for such an **ICP**.~~

(1A) This clause and clauses 9 to 12 apply to a switch move process.

(2) If subpart 2 of Part 4A of the Fair Trading Act 1986 ~~the Door to Door Sales Act 1967~~ applies to an arrangement described in subclause (1),—

(a) the gaining **trader** must identify the period within which the **customer** or **embedded generator** may cancel the arrangement in accordance with section 36M of the Fair Trading Act 1986 ~~section 7 of the Door to Door Sales Act 1967~~; and

(b) for the purpose of this Schedule, the arrangement is deemed to come into effect on the day after the expiry of the period.

**9 Gaining trader advises registry of switch move request**

(1) For each **ICP** to which a switch relates, the gaining **trader** must advise the **registry** of the switch request ~~type and the proposed **event date**~~ no later than 2 **business days** after the arrangement with the **customer** or **embedded generator** comes into effect.

(2) The gaining **trader** must include in its advice to the **registry**—

(a) a proposed **event date**; and

(b) that the switch type is MI; and

(c) 1 or more **profile** codes of a **profile** at the **ICP**.

~~**10 Losing trader provides information**~~

~~Within 3 **business days** after receipt of notification from the **registry** in accordance with clause 22(a), the **trader** who is recorded on the **registry** as being responsible for the **ICP** (the "losing **trader**") must confirm the proposed **event date** or set another expected **event date** (that must not precede the gaining **trader's** proposed **event date** and must be no more than 10 **business days** after the date of such notification), and must—~~

~~(a) provide acknowledgement for the switch move by—~~

~~(i) providing confirmation of the expected **event date** to the **registry**; and~~

~~(ii) if relevant for the **ICP**, provide a valid switch response code approved by the **Authority** to the gaining **trader**; or~~

~~(b) provide final information to complete the switch move by—~~

~~(i) providing confirmation of the actual **event date** to the **registry**; and~~

~~(ii) providing, either the **validated meter reading** or a **permanent estimate** as at the actual **event date** to the gaining **trader**, and if a **permanent estimate** is supplied, the date of the last **validated meter reading** at the **ICP**; or~~

~~(c) providing a request for withdrawal of the switch in accordance with clause 17.~~

**10 Losing trader response to switch move request**

(1) No later than 3 **business days** after receiving notification of a switch request from the **registry** under clause 22(a), the **trader** that is recorded on the **registry** as being responsible for the **ICP** (the "losing **trader**") must,—

(a) if the losing **trader** accepts the **event date** proposed by the gaining **trader**, complete the switch by providing to the **registry**—

(i) confirmation of the **event date**; and

(ii) a valid switch response code approved by the **Authority**; and

(iii) final information in accordance with clause 11; or

(b) if the losing **trader** does not accept the **event date** proposed by the gaining **trader**, acknowledge the switch request to the **registry** and determine a different **event date** that—

(i) is not earlier than the gaining **trader's** proposed **event date**; and

(ii) is no later than 10 **business days** after the date of the notification; or

(c) request that the switch be withdrawn in accordance with clause 17.

(2) If the losing **trader** determines a different **event date** under subclause (1)(b), the losing **trader** must also complete the switch by providing to the **registry** the information described in subclause (1)(a), but in that case the **event date** is the **event date** determined by the losing **trader**.

**11 Losing trader must provide final information**

If the losing **trader** has provided information to the **registry** in accordance with clause 10(a)(ii), then ~~within~~ no later than 3 **business days** after the ~~later of the actual~~ **event date** ~~or date of receipt of the switch request~~, the losing **trader** must provide final information to the **registry** for the purposes of clause 10(a)(ii)(C), including—

(a) ~~provide confirmation of~~ the ~~actual~~ **event date** ~~to the **registry**~~; and

(b) ~~provide the actual **event date** and either the **validated meter reading** or a **permanent estimate**~~ a **switch event meter reading** as at the ~~actual~~ **event date** ~~to the gaining **trader**.~~ for each **meter** or **data storage device** that is recorded in the **registry** with an accumulator type of C and a settlement indicator of Y; and

(c) if the **switch event meter reading** is not a **validated meter reading**, the date of the last **meter reading** of the **meter** or **data storage device** described in paragraph (b).

**12 Gaining trader may change switch event meter reading ~~validated meter reading or permanent estimate~~**

(1) The gaining **trader** may use the **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~** supplied by the losing **trader** or may, at its own cost, obtain its own **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~**.

(2) If the gaining **trader** elects to use the new **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~**, the gaining **trader** must **notify** the losing **trader** of the new **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~** and the ~~actual~~ **event date** to which it refers as follows:

(a) if the **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~** established by the gaining **trader** differs by less than 200 kWh from that provided by the losing **trader**, both **traders** must use the **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~** provided by the gaining **trader** ~~as the~~ **~~validated meter reading~~** ~~or~~ **~~permanent estimate~~**; or

(b) if the **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~** provided by the losing **trader** differs by 200 kWh or more from a value established by the gaining **trader**, the gaining **trader** may dispute the **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~**.

(3) If the gaining **trader** disputes a **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~** under subclause (2)(b), the gaining **trader** must, ~~within~~ no later than 4 ~~calendar~~ months ~~of~~ after the ~~actual~~ **event date**, provide to the losing **trader** a changed **switch event meter reading ~~validated meter reading~~** ~~or a~~ **~~permanent estimate~~** supported by 2 **validated meter readings**, and the losing **trader** must either,—

(a) ~~within~~ no later than 5 **business days** after receiving the **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~** from the gaining **trader**, the losing **trader**, if it does not accept the **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~**, must **notify** the gaining **trader** (giving all relevant details), and the losing **trader** and the gaining **trader** must use reasonable endeavours to resolve the dispute in accordance with the disputes procedure contained in clause 15.29 (with all necessary amendments); or

(b) if the losing **trader** notifies its acceptance of the **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~** received from the gaining **trader**, or does not provide any response, the losing **trader** must use the **switch event meter reading ~~validated meter reading~~** ~~or~~ **~~permanent estimate~~** supplied by the gaining **trader** ~~in accordance with this clause~~.

*~~Half-hour~~ Gaining trader switch~~ing~~ process*

**13 Gaining trader switching process**

(1) A gaining **trader** switch process applies when~~This clause and clauses 14 to 16 apply if~~ a **trader** (the "gaining **trader**") has an arrangement with a **customer** or **embedded generator** to—

(a) trade **electricity** through—

(i) a **half-hour metering installation** at an **ICP** with a submission type of **half hour** on the **registry** and an AMI flag of "N" at which another **trader** (the "losing **trader**") trades **electricity** through a **half-hour metering installation** with the **customer** or

**embedded generator** with a submission type of **half hour** on the **registry** and an AMI flag of "N"; or

(ii) a **half-hour metering installation** at an **ICP** with a submission type of **half hour** on the **registry** and an AMI flag of "N" at which another **trader** (the "losing **trader**") trades **electricity** through a non **half-hour metering installation** with the **customer** or **embedded generator** with a submission type of non **half hour** on the **registry** and an AMI flag of "N"; or

(iii) a non **half-hour metering installation** at an **ICP** at which another **trader** (the "losing **trader**") trades **electricity** through a **half-hour metering installation** with an AMI flag of "N" with the **customer** or **embedded generator**; or

(b) assume responsibility under clause 11.18(1) for ~~such~~ an **ICP** described in paragraph (a).

(2) This clause and clauses 14 to 16 apply to a gaining trader switch process.

**14 Gaining trader informs registry of switch request**

(1) For each **ICP** to which ~~the~~a switch relates, the gaining **trader** must advise the **registry** of the ~~expected **event date** and switch type~~ switch request no later than 3 **business days** after the arrangement with the **customer** or **embedded generator** comes into effect.

(2) The gaining **trader** must include in its advice to the **registry**—

(a) a proposed **event date**; and

(b) that the switch type is HH.

(3) Unless subclause (4) applies, the proposed **event date** must be a date that is after the date on which the gaining **trader** advises the **registry**.

(4) The proposed **event date** may be a date that is before the date on which the gaining **trader** advises the **registry**, if—

(a) the proposed **event date** is in the same month as the date on which the gaining **trader** advises the **registry**; or

(b) the proposed **event date** is no more than 90 days before the date on which the gaining **trader** advises the **registry**, and the losing **trader** and gaining **trader** agree on the proposed **event date**.

**15 Losing trader provides information**

~~Within~~ No later than 3 **business days** after the losing **trader** receives information from the **registry** in accordance with clause 22(a), ~~and if relevant for that **ICP**,~~ the losing **trader** must (if relevant to that **ICP**)—

(a) provide ~~to~~ the **registry** with a valid switch response code approved by the **Authority**; or

(b) ~~provide a~~ request that ~~for withdrawal of~~ the switch be withdrawn in accordance with clause 17.

**16 Gaining trader ~~to notify registry~~ obligations**

(1) The gaining **trader** must ~~notify~~ complete the switch by advising the **registry** of the ~~actual~~ **event date** no later than 3 **business days** after the ~~actual~~ **event date**.

(2) If the **ICP** is being **de-energised** or if **metering** equipment is being removed, the gaining **trader** must either—

(a) give the losing **trader** or the **MEP** for the **ICP** an opportunity to **interrogate** the **metering installation** immediately before the **ICP** is **de-energised** or the **metering** equipment is removed; or

(b) carry out an **interrogation** and, no later than 5 **business days** after the **metering installation** is **de-energised** or removed, advise the losing **trader** of—

(i) the results of the **interrogation**; and

(ii) the **metering component** numbers for each data channel in the **metering installation**.

*Withdrawing a switch request*

**17 Withdrawal of switch requests**

A losing **trader** or gaining **trader** may request that a switch request be withdrawn at any time until the expiry of 2 ~~**calendar**~~ months after the **event date** ~~of the switch~~.

**18 Withdrawing a switch request**

If a **trader** requests the withdrawal of a switch under clause 17, the following provisions apply:

(a) the **Authority** must determine the valid codes for withdrawing a switch request ("withdrawal advisory codes"):

(b) the **Authority** must **publish** the withdrawal advisory codes:

(c) for each **ICP**, the **trader** withdrawing the switch request must provide the **registry** with the following information:

(i) the **participant identifier** of the **trader**; and

(ii) the withdrawal advisory code **published** by the **Authority** in accordance with paragraph (b):

(d) ~~within~~ no later than 5 **business days** after receiving a notification from the **registry** in accordance with clause 22(b), the **trader** receiving the withdrawal must notify the **registry** that the switch withdrawal request is accepted or rejected. A switch withdrawal request must not become effective until accepted by the **trader** who received the withdrawal:

(e) on receipt of a rejection notification from the **registry** in accordance with paragraph (d), a **trader** may re-submit a switch withdrawal request for an **ICP** in accordance with paragraph (c). All switch withdrawal requests must be resolved ~~within~~ no later than 10 **business days** after the date of the initial switch withdrawal request:

(f) if a **trader** requests that a switch request be withdrawn and the resolution of that switch withdrawal request results in the switch proceeding, ~~within~~ no later than 2 **business days** after receipt of notification from the **registry** in accordance with clause 22(b), the losing **trader** must comply with clauses 3, 5, 10 and 11 (whichever is appropriate) and the gaining **trader** must comply with clause 16.

*Exchange of information*

**19 Participants to use file formats**

**Participants** who exchange information in accordance with this Schedule must use the file formats determined and **published** by the **Authority**.

**20 Method of exchanging files**

(1) The **Authority** may, from time to time, after consultation with **participants**, do all or any of the following:

(a) determine the method by which **participants** exchange information:

(b) determine the file formats that **participants** must use to exchange information:

(c) alter the file formats or the method by which **participants** exchange information.

(2) The **Authority** must **publish** the file formats.

**21 Metering information**

For ~~an~~ each **interrogation** ~~or **validated meter reading** or **permanent estimate**~~ **switch event meter reading** carried out in accordance with this Schedule,—

(a) the **trader** who carries out the **interrogation** or ~~**validated meter reading** or **permanent estimate**~~ **switch event meter reading** must ensure that the **interrogation** is as accurate as possible, or that the ~~**validated meter reading** or **permanent estimate**~~ **switch event meter reading** is fair and reasonable (as the case may be); and

(b) the cost of each **interrogation** or ~~**validated meter reading** or **permanent estimate**~~ **switch event meter reading** must be met as follows:

(i) for each **interrogation** or **switch event meter reading** carried out in accordance with clauses 5(b) or ~~10(b)(ii)~~ 11(b) or (c), the cost must be met by the losing **trader**; and

(~~c~~ii) in every other case, the cost ~~the costs of every other **interrogation** or **validated meter reading** or **permanent estimate**~~ must be met by the gaining **trader**.

**22 Registry notifications**

The **registry** must provide notifications to **participants** required by this Schedule as follows:

(a) on receipt of information about a switch request in accordance with clauses 2, 9 and 14, the **registry** must notify the losing **trader** of the information received:

(b) on receipt of information about a withdrawal request in accordance with clauses 18(c) and (d), the **registry** must notify the other relevant **trader** of the information received:

(c) on receipt of information about a switch acknowledgement in accordance with clauses 3(a) and 15, the **registry** must notify the gaining **trader** of the information received:

(d) on receipt of information about a switch completion in accordance with clauses 5, 10 and 16, the **registry** must notify the gaining **trader**, the losing **trader**, the **metering equipment provider**, and the relevant **distributor** of the information received.

# Changes to Part 15

## Schedule 15.2
## Collection of volume information

…

**6 When non ~~Non~~ half hour meter readings apply ~~from end of day~~**

Non **half hour meter readings** are deemed to apply—

(a) if the non **half hour meter reading** is also a **switch event meter reading**—

(i) for the gaining **trader**, from 0000 hours on the day of the relevant **event date**; and

(ii) for the losing **trader**, from 2400 hours at the end of the day before the relevant **event date**; or

(b) in all other cases, from 0000 hours on the day after the last **meter interrogation** up to and including 2400 hours on the day of the **meter interrogation**.

…

# Changes to Part 17

**17.101A Switching under Schedule 11.3**

(1) This clause applies to an arrangement between a **trader** and a **customer** or **embedded generator** to carry out a switch in relation to an **ICP** under Schedule 11.3.

(2) If the arrangement came into effect before 9 October 2015 and the relevant switch had not been completed by that date, the switch must be completed in accordance with Schedule 11.3 as amended by the Electricity Industry Participation Code Amendment (Switch Processes) 2014.