

Switch process review – Issues consultation summary of submissions

Submitter	Question	Submission	Authority response
Other comments			
Aurora Energy	Other comments	<p>2 Issues associated with switching ICPs between distributor and embedded network owner</p> <hr/> <p>2.1 The Authority has identified issues that may be introducing operational inefficiencies and/or hindering competition as a result of switching ICPs between distributors.</p> <p>2.2 We recently had an instance on our network which highlights a further issue that may be introducing operational inefficiencies as a result of switching ICPs between distributors and embedded network owners.</p> <p>2.3 The Authority has rightly pointed out that <i>“If an ICP is switched between networks, the distributor-distributor switch process transfers the ICP identifier in the registry from the losing distributor’s participant identifier to the gaining distributor’s participant identifier”</i>¹.</p> <p>2.4 What appears to be happening, in the case of a switch from a distributor to an embedded network owner, is that the participant identifier is not being updated to reflect the gaining embedded network owner’s unique participant identifier. This can have the effect of a participant being under the impression that the losing distributor is the</p>	<p>Noted</p> <p>The participant responsible for the participant identifier in the registry remains responsible for maintaining the registry. Where an ICP identifier has failed to transfer, it may not have been identified in the switch file. There is no real answer to failure to identify all of the relevant ICPs apart from diligence and correcting errors where they occur. In this instance, the non-switch of between distributors of an ICP should be referred to the Authority as soon as possible.</p>

¹ 2018. Electricity Authority; Switch Process Review – Issues with the ICP switching processes Issues paper to develop a proposal for future code amendment, para 3.14

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		<p>participant responsible for the ICP, when in fact it has been switched to the gaining embedded network owner.</p> <p>2.5 We believe that remedying this inconsistency would eliminate confusion within the industry as to who is the responsible party after a switch of this type has taken place.</p> <p>3 Backdating price category codes</p> <hr/> <p>3.1 We agree with the Authority that the Electricity Industry Participation Code 2010 (Code) does not permit a distributor to backdate changes to a price category code.</p> <p>3.2 The Authority has set out in the Consultation Paper that if a price category code is backdated for an ICP, the trader responsible for that ICP faces the risk of being unable to pass on this backdated charge to the customer or embedded generator at the ICP². The Authority acknowledges, however, that price category codes may occasionally need to be backdated as part of ICP switching³.</p> <p>3.3 Our view is that the Code should be amended to allow distributors to backdate price category codes if the trader responsible for the ICP has agreed to the code being backdated. This would enable the trader to:</p> <ul style="list-style-type: none"> • agree in instances where it has the ability to pass on the related charges to consumers; and • withhold its agreement in instances where it cannot 	<p>Noted. This is included in Issue 20</p> <p>Noted. This is being dealt with under a separate Code amendment proposal</p>

² Ibid at 1, para 5.13

³ Ibid at 1, para 5.14

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		pass on those charges to consumers.	
Mercury	Other comments	Where we have not made express comment, we agree with the Authority's proposed changes.	Noted
Trustpower	Other comments	<p>In regard to the Switch Process Review, we wish to highlight the need for an amendment to Part 11 of the Code.</p> <p>A well-known industry de facto practice has arisen, whereby gaining traders switching large batches of commercial ICPs have been using the move-in (MI) switch type, instead of the transfer (TR) switch type mandated by Schedule 11.3, Clause 2(2)(b) of the Code.</p> <p>This is because the transfer switch type does not allow gaining traders and losing traders to fix a date for the switch. The move-in switch type does allow this, giving certainty to consumers, traders and distributors that contractual obligations will be met and that billing outcomes are accurately reflected.</p> <p>Trustpower submits that the Code be amended to allow traders to fix a switch date whilst using the mandated transfer switch type.</p> <p>We consider that amending the Code to enable a fix date for transfers would correct a well-known issue with the current switch process and thereby promote the efficient operation of the current switch arrangements.</p>	Noted. This is included in issue 1
Unison Networks	Other comments	Unison notes that there are a number of issues that the <i>Switch Process Review</i> touches on; however, our submission only considers Issue 20.	Noted
Vector	Other comments	Switching ICPs between traders	

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		<p>4. Vector acknowledges the various issues identified in the Issues Paper in relation to the switching of ICPs between traders. In our view, improving the efficiency of this process would have a direct and immediate benefit for electricity consumers by making the process of selecting the services they prefer easier, timelier, and less costly. This promotes retail market competition and participation, product and service innovation, and consumer choice.</p> <p>5. Our smart metering business provides half-hourly electricity consumption data to multiple traders across New Zealand. We would be happy to provide information or insights that would assist the Authority's development of options to improve the efficiency of the switching process between traders.</p> <p>Switching ICPs between distributors</p> <p>6. Vector generally agrees with the inefficiencies identified under Issue 18 of the Issues Paper, which relate to the process of switching ICPs between distributors.</p> <p>7. Our electricity distribution business has faced the following issues under existing Code arrangements:</p> <ul style="list-style-type: none"> a. The current process requires all parties that will be impacted by the switch to agree to the switch. This has caused issues when: <ul style="list-style-type: none"> 1) Traders do not respond in a timely manner. In some instances, we (as a distributor) had to push back the transfer dates due to delays. 2) A trader refuses the switch. There appears to be no clear rules around when, or the circumstances under which, a trader can refuse the switch. b. At present, there is no clear mechanism for rectifying a 	<p>Noted</p> <p>Noted. VectorAMS was a member of the switch technical group and contributed with insights to that group</p> <p>Noted. This is included in Issue 20</p>

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		<p>situation where ICPs are created against the wrong network. The process of correcting such an error in the registry can take months to complete. In addition, a trader can refuse for the correction to be made, creating a barrier to the resolution of the issue.</p> <p>c. It cannot be determined from the registry whether a switch between distributors is in progress or is pending. There are instances where approval from the trader has been obtained, but then the ICP is switched to a new trader before the pending distributor switch is completed. This causes issues not only for us (the distributor) as further approval is required, but also for the gaining trader whose offer to the customer may have been based on the old distributor's pricing offer.</p> <p>d. Inefficiencies are also created in these circumstances:</p> <ol style="list-style-type: none"> 1) The distributor needs to manually complete a request form and produce a DS-010 file, which is essentially the information copied from the registry with a few changes. 2) Once the transfer of ICPs between distributors is complete, the distributor needs to send an email to the affected traders confirming that the switch is complete. <p>8. In our view, the automation of the above processes (similar to the approach used for switching ICPs between traders) would significantly improve the efficiency and accuracy of the process of switching ICPs between distributors. This would result in fewer errors and lower transaction costs for the relevant market participants and their customers.</p> <p>9. As part of further informing and progressing the <i>Switch Process</i></p>	<p>Noted. This is included in Issue 20</p>

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		<i>Review</i> , we suggest that the Authority undertake a cost-benefit analysis of the automation of the above processes. The analysis could include how future costs should be fairly allocated between the relevant market participants that are likely to benefit from the process improvements.	A cost benefit analysis will be performed at a later stage of the project when the preferred options are determined, and costs and benefits quantified.
Wellington Electricity	Other comments	<p>Wellington Electricity supports the proposed changes.</p> <p>We would like to highlight an issue with the Trader switch where the new Trader completes a Pricing Plan change and the switch then gets reversed. The new Pricing Plan change is not always picked up by the original Trader after the switch has been reversed.</p> <p>Recommendation: EA flag a Pricing Plan change when a Trader switch is reversed.</p>	Noted. This is included in Issue 10
General questions Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.			
Contact Energy	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	None - all require attention or some form of change in our view (Code, registry functionality or guideline).	Noted
Electric Kiwi	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be	None	Noted

Submitter	Question	Submission	Authority response
	investigated further? Please give reasons.		
Flick Energy	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.		
Genesis Energy	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	In our view, many of the issues raised are interlinked so we do not believe that they should be resolved independently or there could be unintended consequences. Where we believe there is an interconnection between issues, <i>we have indicated so</i> .	Agree, and there are multiple options to resolving any one individual issue
IntelliHub	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	<i>As a new participant we have not yet come across the issues raised in this paper but happy to provide feedback where we can.</i>	Noted
Mercury	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	N/A	
Meridian and	Q1. Which, if any, of	Meridian / Powershop is unsure of the materiality of certain	Noted

Submitter	Question	Submission	Authority response
Powershop	the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	issues, as identified in our responses detailed below. We do not have any firm views at this stage, however, regarding specific items that should be withdrawn from consideration.	
Metrix	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	<i>Q1. No comments</i>	
Northpower	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	<i>No comment as not all issues affect Northpower as a Distributor and Metering Equipment Provider</i>	
Nova Energy	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	<i>NA</i>	
Orion Energy	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further?	We have only reviewed a selection of issues and therefore make no comment here.	Noted

Submitter	Question	Submission	Authority response
	Please give reasons.		
Powerco	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.		
Simply Energy	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	<ul style="list-style-type: none"> • Issue No.1 - The actual switch event date is delayed or is not as agreed. There is already a process between parties that iron out these disagreements. In the event of a Move In switch or HHR the losing trader can send a NWDF. On a Transfer switch the losing trader chooses the switch event date. • Issue No.4 – A trader should not have to issue a switch completion notification for an ICP with only unmetered load. This is still a switch between two Traders so I can't see why the switch process should not be followed. The CS file should only have the top ICP record in the file. • Issue No.7 – Interpreting trader ICP switching as customer or embedded generator switching may be misleading. This may cause the Authority to take time to validate but the only outcome I can see from investigating this further would be a larger cost to Traders. If it was required that we need to report every single customer change that may or may not be Market related then there is significant changes to systems that does not justify the changes proposed. • Issue No 13 – Sometimes switch event meter readings 	<p>Noted. This included in issue 1</p> <p>Noted. This has been removed from the issues</p> <p>Noted. This will be investigated in Issue 6</p> <p>Noted. However the Code does not currently deal with the</p>

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		cannot be obtained despite best endeavours. If a reading cannot be obtained then a permanent estimate is used. This is a process well defined so I don't see any issue with investigating this issue further.	situation where there is insufficient information available to create a permanent estimate.
Tenco	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	<i>Nil</i>	Noted
Trustpower	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.	<i>Issue 4 – A Trader should not have to issue a switch completion notification for an ICP with only unmetered load.</i> This would incur cost and cause disruption to traders for no perceived benefit. There would not create a better outcome for the customer, and it would require software development to cater for the changes, incurring extra cost for participants. We are unsure which current issues have caused this change to be required.	Noted. This has been removed from the issues
Unison Networks	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.		
Vector	Q1. Which, if any, of the 22 issues raised in this paper do you		

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	consider should not be investigated further? Please give reasons.		
Wellington Electricity	Q1. Which, if any, of the 22 issues raised in this paper do you consider should not be investigated further? Please give reasons.		
General questions Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.			
Electric Kiwi	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.	<p>1) We would like to raise the issue around double withdrawals. An example of this is when an ICP switches to us from trader X, and after a few weeks' time, we find that the meter is not communicating. If the MEP decides not to fix the communication issue, we then need to switch the customer to another trader (Y). Occasionally once they choose a new trader, we agree with the customer or the new trader to remove ourselves as a trader for that time period. This results in us having to NW the new switch with trader Y, then get trader X to agree to a withdrawal as well. Eventually, trader Y will send a new NT directly to trader X. This is currently handled through a lot of emails, phone calls, and registry files. An ideal option would be a new type of NW that "removes a time slice", which can be initiated by trader removing themselves or by gaining trader;</p> <p>2) We believe that free text fields in switch files which be a huge benefit to the process. This would remove the need to email</p>	<p>Noted. This has been added as a new Issue 18</p> <p>Noted. This is included in Issue</p>

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		other traders and the registry would contain all needed information.	10
Flick Energy	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.		
Genesis Energy	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.	<p>A number of the issues raised are caused by parts of the industry changing faster than others and we consider the current switching process needs a holistic re-think to:</p> <ul style="list-style-type: none"> a) resolve issues created by increasing differentiation and innovation among participants; and b) future-proof the process for a future where there are multiple services offered to a single ICP. <p>This was also identified by the STWG.</p>	Noted. This will be identified also through separate technology related consultations
IntelliHub	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.	No.	Noted
Mercury	Q2. Are there any	N/A	

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	<p>issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.</p>		
Meridian and Powershop	<p>Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.</p>	<ol style="list-style-type: none"> 1. Participants can currently reconnect an ICP and are not always sending the NT file. We understand this is being proposed through a Code amendment, however we feel this needs to be addressed as a switch process change as well as under Part 10. 2. Wrong switch types being used/backdated TR switches – there are times when a mutual customer has commenced a new contract with a new trader after the commencement date (councils etc). Currently the only way to request this is to ensure the current trader terminates their contract with the mutual customer the day prior to the commencement date. This highlights that the current switch process and/or the wording of the Code is not efficient for these instances. We note that not all traders systems allow for a backdated TR switch request. 3. There is nothing in the Code to prevent gaining traders sending an NTMI more than 10 days in the future. This then creates additional and unnecessary work for both participants in the form of completing the withdrawal process and then re-requesting the ICP(s). 4. The current wording around withdrawals needs to be redefined to ensure it is clear what each withdrawal code is 	<p>Noted. This has been added as a new Issue 17</p> <p>Noted. This is included in Issue 1</p> <p>Noted. This is included in Issue 10</p> <p>Noted. This is included in Issue 10</p>

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		used for and when it can be rejected (e.g. NWWP being rejected within a 2 month period due to no customer to bill or NWDF being rejected prior to the CS file being received).	
Metrix	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.	<p><i>Q2. MEP nominations and metering event dates unable to occur independently:</i></p> <p><i>During an MEP switch, a Trader's delay in updating a proposed MEP can cause issues in updating the Registry. If a metering event date is recorded by the [unknowing] losing MEP before an MEP switch is made apparent, then it may need to be reversed to allow the Trader to nominate the gaining MEP from the physical date of install. An example of this is when a non-communicating meter is updated to show AMI Comms=N after the correct period, but a Trader has already organised for a meter change to occur with another MEP without updating the Registry. The losing MEP has no incentive to reverse the most recent time slice, but by not making the reversal update, is impeding other participants to comply with the Code.</i></p> <p><i>A greater encouragement of Traders updating Registry in parallel to raising service requests with gaining MEPs would greatly reduce this issue.</i></p>	Noted. This has been added as a new Issue 29
Northpower	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.	<p><i>A trader cannot nominate a new MEP using the same event date that the current MEP has entered meter data into the Registry. This causes delays in the MEP switch process while the trader communicates with the current MEP who has to reverse entries from the Registry to enable the nomination of the new MEP.</i></p> <p><i>The Registry should allow a trader to nominate a new MEP on or after the latest metering event date in the Registry. The new MEP should be allowed to accept a nomination and update their</i></p>	Noted. This is included in Issue 25

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		<p><i>meter data into the Registry with an effective date on or after the latest metering event date in the Registry.</i></p> <p><i>This is related to the same problem outlined in Issue 23 as the losing MEP metering event precludes either a MEP nomination or the gaining MEP updating their meter data into the Registry.</i></p>	
Nova Energy	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.	Though not a switching issue: it would be beneficial to have the data from the following field of the registry added to the end of the LIS and EDA reporting i.e. C&I TOU, AMI Comm and AMI Non Comm, as this will help the Traders identify TOU and Non communicating sites more readily.	Noted. This is included in Issue 26
Orion Energy	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.	No further comment	
Powerco	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should		

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	be investigated.		
Simply Energy	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.	<ul style="list-style-type: none"> The acknowledgement of a switch request notification for MI switch type code should be changed to may provide an AN file. If the losing trader agrees with the switch date then the AN file is redundant. Some MEPs detect a switch loss is in progress and cease sending through AMI reads which force the trader into using a switch estimate, if MEP's started to receive the NT file then this may lead to more of these issues which would not be a desired outcome. Switching CS file on Category 1 or 2 profile HHR should be looked at. This process should be like the HHR Category 3 to 5, and it was until a change a few years back. As a losing trader when you are sending a CS file on an AMI N meter there are no readings to be sent. I believe a number of traders were not able to automate this. 	<p>Noted. This is included in Issue 8</p> <p>Noted. In this instance, the MEP may be breaching Clause 1 of Schedule 10.6. Included in Issue 3</p> <p>Noted. The registry process and file structure are identical for a trader ICP switch involving an ICP with a maximum metering category of 2, or a metering category of 3 or greater.</p> <p>The only difference is who completes the switch. Where there are no meter accumulating channels. No meter readings are required. A proposal to ensure that MEPs do not populate accumulating channels in the registry metering records where it is not necessary is included in Issue 14</p>
Tenco	Q2. Are there any issues not raised in this	No	

Submitter	Question	Submission	Authority response
	<p>paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.</p>		
Trustpower	<p>Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.</p>	<p>In particular, we wish to highlight the need for an amendment to Part 11 of the Code.</p> <p>A well-known industry de facto practice has arisen, whereby gaining traders switching batches of commercial ICPs have been using the move-in (MI) switch type, instead of the transfer (TR) switch type mandated by Schedule 11.3, Clause 2(2)(b) of the Code.</p> <p>This is because the transfer switch type does not allow gaining traders and losing traders to fix a date for the switch. The move-in switch type does allow this, giving certainty to consumers, traders and distributors that contractual obligations will be met and that billing outcomes are accurately reflected.</p> <p>Trustpower submits that the Code be amended to allow traders to fix a switch date whilst using the mandated transfer switch type.</p> <p>We consider that amending the Code to enable a fix date for transfers would correct a well-known issue with the current switch process and thereby promote the efficient operation of the current switch arrangements.</p> <p>Consideration should also be given to acquisition customers arising through take-overs, buyouts and defaults by creating a new switch type (perhaps AQ?) This would ensure visibility for all</p>	<p>Noted. This is included in Issue 1</p> <p>Noted</p> <p>Noted. This is included in Issue 7</p>

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		<p>participants and ensure a smooth transition when dealing with affected customers. This is particularly the case when considering future start read amendments, audit requirements etc. This change would also ensure these ICPs improve statistical data by not falling into the general churn bucket.</p> <p>In reference to Issue #9, it is unclear whether an acknowledgment of a switch request notification is required. We believe ANs should be compulsory for both MIs & TRs (current advisory codes are useful and provide valuable insight). In addition, we believe that a critical customer code should be included for standard switches. This will notify the gaining trader, who can therefore contact the customer if this information differs from what was provided on signup (reducing risk and ensuring accurate data).</p>	Noted. This is included in Issue 8
Unison Networks	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.		
Vector	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should		

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	be investigated.		
Wellington Electricity	Q2. Are there any issues not raised in this paper that you consider should be investigated? Please identify these other issues and give reasons why they should be investigated.		
Issue 1: The actual switch event date is delayed or is not as agreed			
Q3. How material is this issue?			
Contact Energy	Issue 1, Q3. How material is this issue?	Not considered a significant issue.	Noted
Electric Kiwi	Issue 1, Q3. How material is this issue?	This has not presented any major problems for us. However, we would like to note that ideally the solution should not be forcing the losing trader to accept the gaining traders proposed date. This type of solution would then cause similar issues mentioned in the paper, but in the reverse	Noted. This is included in issue 1
Flick Energy	Issue 1, Q3. How material is this issue?	This issue is causing operational inefficiencies as manual interference is required to get the event date issue resolved. This also causes customer frustration as we are unable to meet our customer obligations of supplying on an agreed date. This leaves the situation open for win back activity, limiting	Noted. This undesirable outcome is included in Issue 1

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		competition.	
Genesis Energy	Issue 1, Q3. How material is this issue?	<p><i>This relates to issues 2 and 10</i></p> <p>Genesis is not aware of any evidence that this issue is widespread. In the year to 30 June 2018, our average switch time was 2-3 days and there was high compliance with the 10-day rule: we processed 37,592 TR losses, none of which exceeded 10 days; 956 exceeded 5 days. We also processed 28,609 gains, of which 34 exceeded 10 days; 717 exceeded 5 days.</p> <p>In our view, the real issue is that the date of the switch is determined by the losing trader. This removes the ability for the gaining trader to align ICP ownership with any commercial arrangement made with the customer e.g. necessary metering changes or commencement of products and services.</p> <p>We suggest that the process should be changed so that the gaining trader can elect to provide the switch date. The gaining trader would need to operate within specified parameters so as to avoid any valid restrictions.</p>	<p>Noted</p> <p>Noted. This is included in issue 1</p>
IntelliHub	Issue 1, Q3. How material is this issue?	No comment to add	
Mercury	Issue 1, Q3. How material is this issue?	This can be material if there is no communication between retailers.	Noted
Meridian and Powershop	Issue 1, Q3. How material is this issue?	Meridian / Powershop considers the issue is reasonably material.	Noted
Metrix	Issue 1, Q3. How material is this issue?		

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Northpower	Issue 1, Q3. How material is this issue?	<i>No material effect on Northpower as a Distributor unless the switch is backdated for an abnormally long period in the Registry. We have noted a few cases of ICPs with HHR metering where the switch event date in the Registry has been populated up to 3 months late which creates additional complexity in rebilling demand based ICPs.</i>	Noted. The Code does allow trader ICP switches where the metering category is 3 or greater to be backdated up to 3 months provided that both the losing and gaining trader agree.
Nova Energy	Issue 1, Q3. How material is this issue?	In most instances a switch is not completed on the requested date due to the losing Trader having an existing agreement with the customer, or to allow the losing Trader to gain correct reads. Due to the timeframes for completing switches in place for compliance there is minimal impact for customers and Traders.	Noted
Orion Energy	Issue 1, Q3. How material is this issue?		
Powerco	Issue 1, Q3. How material is this issue?		
Simply Energy	Issue 1, Q3. How material is this issue?		
Tenco	Issue 1, Q3. How material is this issue?		
Trustpower	Issue 1, Q3. How material is this issue?	<p>High</p> <ul style="list-style-type: none"> • Current rules do not allow for an optimal experience. Due to contractual agreements, a set date is required. • Change in metering configuration (prepaid as an example) 	Noted. This is included in issue 1

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		<ul style="list-style-type: none"> Mutual customer may have contractual agreements with both traders. 	
Unison Networks	Issue 1, Q3. How material is this issue?		
Vector	Issue 1, Q3. How material is this issue?		
Wellington Electricity	Issue 1, Q3. How material is this issue?		
Issue 1: The actual switch event date is delayed or is not as agreed Q4. Is this issue getting worse?			
Contact Energy	Issue 1, Q4. Is this issue getting worse?	The issue occurs often, however is small in overall volume	Noted
Electric Kiwi	Issue 1, Q4. Is this issue getting worse?	This has not presented any major problems for us. However, we would like to note that ideally the solution should not be forcing the losing trader to accept the gaining traders proposed date. This type of solution would then cause similar issues mentioned in the paper, but in the reverse.	Noted. This is included in issue 1
Flick Energy	Issue 1, Q4. Is this issue getting worse?	Yes, this is getting worse with the increase in switch activities.	Noted
Genesis Energy	Issue 1, Q4. Is this issue getting worse?	<i>This relates to issues 2 and 10</i>	Noted. This is included in issue 1

Submitter	Question	Submission	Authority response
		<p>As per the consultation paper, the issue has been observed, at consistent levels, since the 5/10-day rule was introduced.</p> <p>Demand to have the gaining trader determine the switch date has grown as competition to create more differentiation in products has increased.</p>	
IntelliHub	Issue 1, Q4. Is this issue getting worse?		
Mercury	Issue 1, Q4. Is this issue getting worse?	This shouldn't become an issue as long as communication between retailers continues to the same level.	Noted
Meridian and Powershop	Issue 1, Q4. Is this issue getting worse?	Yes.	Noted
Metrix	Issue 1, Q4. Is this issue getting worse?		
Northpower	Issue 1, Q4. Is this issue getting worse?		
Nova Energy	Issue 1, Q4. Is this issue getting worse?	No	Noted
Orion Energy	Issue 1, Q4. Is this issue getting worse?		
Powerco	Issue 1, Q4. Is this issue getting worse?		
Simply Energy	Issue 1, Q4. Is this issue		

Submitter	Question	Submission	Authority response
	getting worse?		
Tenco	Issue 1, Q4. Is this issue getting worse?		
Trustpower	Issue 1, Q4. Is this issue getting worse?	Yes	Noted
Unison Networks	Issue 1, Q4. Is this issue getting worse?		
Vector	Issue 1, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 1, Q4. Is this issue getting worse?		
Issue 1: The actual switch event date is delayed or is not as agreed Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 1, Q5. Why do you think this issue is occurring?	<p>Some Traders systems are built to delay switch losses in certain scenarios, however Contact is not aware of any Traders that have implemented such rules for financial gain. Contact considers most occurrences to be for problematic scenarios requiring manual attention prior to the switch completion being issued.</p> <p>Contact does note that some Traders have built their systems or switching processes to release future dated switch requests (switch gain - NT file) up to 9 business days from the NT release date which can lead to losing Traders being technically in breach of the Code as there is not enough time to process, validate and</p>	<p>Noted. This may be due to slower than optimal updates to registry metering records. This has now been included as a new Issue 28</p> <p>Noted. This is included in Issue 1</p>

Submitter	Question	Submission	Authority response
		complete the switch. This should be remedied under any future Code changes to ensure Traders have sufficient time to process the switch request.	
Electric Kiwi	Issue 1, Q5. Why do you think this issue is occurring?	This has not presented any major problems for us. However, we would like to note that ideally the solution should not be forcing the losing trader to accept the gaining traders proposed date. This type of solution would then cause similar issues mentioned in the paper, but in the reverse.	Noted. This is included in Issue 1
Flick Energy	Issue 1, Q5. Why do you think this issue is occurring?	The current code does not allow the gaining trader who has contract with the customer to determine the switch event date. There is no visibility to the losing trader who determines the switch event date on customer's expectations.	Noted. This is included in Issue 1
Genesis Energy	Issue 1, Q5. Why do you think this issue is occurring?	<i>This relates to issues 2 and 10</i> Traditional determination of the switch date process has been made redundant by advances in customer offerings.	Noted
IntelliHub	Issue 1, Q5. Why do you think this issue is occurring?		
Mercury	Issue 1, Q5. Why do you think this issue is occurring?	4.2 Not applicable to MEEN but we would consider what other retailers suggest. At the moment MEEN are happy with current switching process as communication between retailers will resolve any event dates that will be delayed until agreed by both gaining/losing retailers. 4.6 Currently we communicate between retailers if we have	Noted Noted

Submitter	Question	Submission	Authority response
		<p>gained a site where a new meter has been installed prior to our gain and we update the metering going forward. But as an internal process we will always NWMI and want to gain on the correct CS file so that the customer is billed on the correct metering going forward.</p> <p>4.7 When we cannot provision certain ICP's we intend to NW and give back to losing retailer, these always get rejected on NTMI yet it was unknown to the gaining retailer that we are unable to gain the site on comms issues etc. We suggest when pre NT, if the registry was able to provide somewhere that certain meters or comms issues are on certain ICP's then NT may not need to be sent? Maybe also a new NW code needs to be added for these particular instances.</p>	Noted. This has been added as a new Issue 26
Meridian and Powershop	Issue 1, Q5. Why do you think this issue is occurring?	Participants systems are a lot more automated than they used to be.	Noted
Metrix	Issue 1, Q5. Why do you think this issue is occurring?		
Northpower	Issue 1, Q5. Why do you think this issue is occurring?	<i>Retailers are negotiating contracts with the customer being switched which are then backdated to a specific (earlier) date such as the start of the customer's financial year.</i>	Noted
Nova Energy	Issue 1, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 1, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
Powerco	Issue 1, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 1, Q5. Why do you think this issue is occurring?		
Tenco	Issue 1, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 1, Q5. Why do you think this issue is occurring?	More contracted customers, commercial as well as residential. Increased activity. Technology changes. Increase in HH submissions due to AMI increases.	Noted
Unison Networks	Issue 1, Q5. Why do you think this issue is occurring?		
Vector	Issue 1, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 1, Q5. Why do you think this issue is occurring?		
Issue 2: Replacing/modifying metering installations on the trader ICP switch event date is difficult Q3. How material is this issue?			

Submitter	Question	Submission	Authority response
Contact Energy	Issue 2, Q3. How material is this issue?	Not considered a significant issue.	Noted
Electric Kiwi	Issue 2, Q3. How material is this issue?	<p>We do not face this issue currently as we do not accept ICPs who have an MEP which we do not have a contract with. However, we agree that this is a considerable issue in the switching process and feel it has the potential for limiting competition. With that said, we don't believe the correct solution is to force the losing retailer to accept the gaining retailers proposed date.</p> <p>Alternative solutions could be:</p> <ol style="list-style-type: none"> 1) MEP to be notified of NT and AN so that they're aware of the status of the switch 2) MEP switch timeframes to be shortened 3) MEP should be able to provide specific information about the site to aid in meter replacement 4) Allowing traders to send NTs up to 20 business days in advance. This would give sufficient time for both losing and gaining traders and MEPs to prepare for a change in the metering installation. This would also require changes in the Code to allow the losing retailer to complete the switch within 5 business days after the greater of the proposed effective date or 	<p>Noted. This is included in Issue 23</p> <p>The Authority cannot regulate a participant until it becomes the MEP. This should be contained in the commercial contract between the trader and the MEP</p> <p>This is already contained in the Code, Clause 3(3) of Schedule 10.6</p> <p>The registry does not block the forward dating of switches</p>

Submitter	Question	Submission	Authority response
		today, not NT received date	
Flick Energy	Issue 2, Q3. How material is this issue?	It is essential for all metering/configuration changes to match customer demand and align with switch event dates to avoid negative first customer experience.	Material
Genesis Energy	Issue 2, Q3. How material is this issue?	<p><i>This relates to issues 1 and 5</i></p> <p>This issue is only material for traders that have an offering limited to a class of metering not currently installed at an ICP the trader wishes to gain, or traders that have limited system capability that is limited to handling data in certain formats.</p> <p>We consider it can be resolved by the solution suggested above under issue #1, that is, allowing a gaining trader to set the switch date.</p>	Noted
IntelliHub	Issue 2, Q3. How material is this issue?	Medium	Noted
Mercury	Issue 2, Q3. How material is this issue?	This is an ongoing issue but Mercury considers the primary impact is on the MEPs but does create an operational inefficiency for traders. It adds extra steps to a manual process with associated resourcing requirements.	Noted
Meridian and Powershop	Issue 2, Q3. How material is this issue?	Meridian / Powershop considers the issue is reasonably material – it creates more work for all involved parties.	Noted
Metrix	Issue 2, Q3. How material is this issue?		
Northpower	Issue 2, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Nova Energy	Issue 2, Q3. How material is this issue?	<p>This could be a major material issue to the Losing Trader.</p> <p>When considering that the meter may be changed or modified for a date before the switch event date, this would mean the losing Trader will be left responsible for any consumption on the new meter setup between change and switch event and the Losing Trader has no option to stop this or visibility at the time it happens.</p> <p>Rules and regulations would have to be looked at in far more depth on this one to cover all parties, otherwise this will cause different and maybe further issues than are currently being experienced</p>	Noted. It is not intended to allow a gaining MEP to install the new meter until the switch event date
Orion Energy	Issue 2, Q3. How material is this issue?		
Powerco	Issue 2, Q3. How material is this issue?		
Simply Energy	Issue 2, Q3. How material is this issue?		
Tenco	Issue 2, Q3. How material is this issue?		
Trustpower	Issue 2, Q3. How material is this issue?	Medium	Noted
Unison Networks	Issue 2, Q3. How material is this issue?		
Vector	Issue 2, Q3. How		

Submitter	Question	Submission	Authority response
	material is this issue?		
Wellington Electricity	Issue 2, Q3. How material is this issue?		
Issue 2: Replacing/modifying metering installations on the trader ICP switch event date is difficult Q4. Is this issue getting worse?			
Contact Energy	Issue 2, Q4. Is this issue getting worse?	No	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 2, Q4. Is this issue getting worse?	<p>We do not face this issue currently as we do not accept ICPs who have an MEP which we do not have a contract with. However, we agree that this is a considerable issue in the switching process and feel it has the potential for limiting competition. With that said, we don't believe the correct solution is to force the losing retailer to accept the gaining retailers proposed date.</p> <p>Alternative solutions could be:</p> <ol style="list-style-type: none"> 1) MEP to be notified of NT and AN so that they're aware of the status of the switch 2) MEP switch timeframes to be shortened 3) MEP should be able to provide specific information about the site to aid in meter replacement 4) Allowing traders to send NTs up to 20 business days in advance. This would give sufficient time for both losing and gaining traders and MEPs to prepare for a change in the metering installation. This would also require changes in the Code to allow the losing retailer to complete the switch within 5 business days after the greater of the proposed effective date or today, not NT received date 	Refer to response to Issue 2
Flick Energy	Issue 2, Q4. Is this issue getting worse?	Yes, with the increase in switch activities and customer demand.	Noted
Genesis Energy	Issue 2, Q4. Is this issue getting worse?	<p><i>This relates to issues 1 and 5</i></p> <p>The issue has worsened as new retailers have entered the market relying on access to mass market half hour (HHR) metering. It will improve as HHR deployments continue.</p>	Noted

Submitter	Question	Submission	Authority response
IntelliHub	Issue 2, Q4. Is this issue getting worse?	No comment to add	
Mercury	Issue 2, Q4. Is this issue getting worse?	Not sure if this issue is getting worse but it is an existing issue.	Noted
Meridian and Powershop	Issue 2, Q4. Is this issue getting worse?	Unsure.	Noted
Metrix	Issue 2, Q4. Is this issue getting worse?		
Northpower	Issue 2, Q4. Is this issue getting worse?		
Nova Energy	Issue 2, Q4. Is this issue getting worse?	No	Noted
Orion Energy	Issue 2, Q4. Is this issue getting worse?		
Powerco	Issue 2, Q4. Is this issue getting worse?		
Simply Energy	Issue 2, Q4. Is this issue getting worse?		
Tenco	Issue 2, Q4. Is this issue getting worse?		
Trustpower	Issue 2, Q4. Is this issue getting worse?	Potentially due to increase in meter configurations.	Noted

Submitter	Question	Submission	Authority response
Unison Networks	Issue 2, Q4. Is this issue getting worse?		
Vector	Issue 2, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 2, Q4. Is this issue getting worse?		
Issue 2: Replacing/modifying metering installations on the trader ICP switch event date is difficult Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 2, Q5. Why do you think this issue is occurring?	<p>In rare cases metering may need to be upgraded/downgraded where a customer moves into a property, however Contact considers there are suitable workarounds in place to enable this to occur without changes to registry functionality. Contact is not aware of any cases where metering equipment needs to change due to agreements not existing with the current MEP.</p> <p>Contact considers that due to the small volume of such occurrences any metering equipment changes are managed and agreed amongst affected parties outside of the switching process to avoid unnecessary system change costs.</p>	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 2, Q5. Why do you think this issue is occurring?	<p>We do not face this issue currently as we do not accept ICPs who have an MEP which we do not have a contract with. However, we agree that this is a considerable issue in the switching process and feel it has the potential for limiting competition. With that said, we don't believe the correct solution is to force the losing retailer to accept the gaining retailers proposed date.</p> <p>Alternative solutions could be:</p> <ol style="list-style-type: none"> 1) MEP to be notified of NT and AN so that they're aware of the status of the switch 2) MEP switch timeframes to be shortened 3) MEP should be able to provide specific information about the site to aid in meter replacement 4) Allowing traders to send NTs up to 20 business days in advance. This would give sufficient time for both losing and gaining traders and MEPs to prepare for a change in the metering installation. This would also require changes in the Code to allow the losing retailer to complete the switch within 5 business days after the greater of the proposed effective date or today, not NT received date 	Refer to response to Issue 2 Q3 above
Flick Energy	Issue 2, Q5. Why do you think this issue is occurring?	The inability for the registry to handle two events on the same date is causing this issue.	Noted
Genesis Energy	Issue 2, Q5. Why do you think this issue is occurring?	<p><i>This relates to issues 1 and 5</i></p> <p>See response to Q2.</p>	Noted

Submitter	Question	Submission	Authority response
IntelliHub	Issue 2, Q5. Why do you think this issue is occurring?	Not practical for a MEP to modify, replace or reprogram an installation to always match the switch event date.	Noted
Mercury	Issue 2, Q5. Why do you think this issue is occurring?	Reason is identified in Issue 2: 4.11	Noted
Meridian and Powershop	Issue 2, Q5. Why do you think this issue is occurring?	If the MEP could update the metering information with the correct effective date (subject to issue #1 being resolved) this would provide a better outcome for the customer and the participants with no rework (i.e. NWMI, re-requesting ICP's).	Noted. This has been added as a new Issue 28
Metrix	Issue 2, Q5. Why do you think this issue is occurring?		
Northpower	Issue 2, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 2, Q5. Why do you think this issue is occurring?	Delay in notification or updating of registry metering details by MEPs. This can also be caused by Traders internal process or identifying of metering changes that have occurred.	Noted. This has been added as a new Issue 28
Orion Energy	Issue 2, Q5. Why do you think this issue is occurring?		
Powerco	Issue 2, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
Simply Energy	Issue 2, Q5. Why do you think this issue is occurring?		
Tenco	Issue 2, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 2, Q5. Why do you think this issue is occurring?	<p>For the reasons outlined in the consultation paper. However, this is biased in favour of the gaining Trader or MEP. What happens when the following occurs?</p> <ul style="list-style-type: none"> • Wrong ICP switched (metering/configuration now changed) • Date was incorrect • Win-back after meter change 	<p>In this instance the losing trader that agreed to the switch withdrawal will receive the customer back with any changes to metering, line charges, or electrical connection status that the gaining trader had carried out. Traders should carefully check the registry for any changes that were made by the gaining trader prior to accepting a switch withdrawal request</p>
Unison Networks	Issue 2, Q5. Why do you think this issue is occurring?		
Vector	Issue 2, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Wellington Electricity	Issue 2, Q5. Why do you think this issue is occurring?		
Issue 3: Gaining traders face difficulties ensuring accurate switch event meter readings Q3. How material is this issue?			
Contact Energy	Issue 3, Q3. How material is this issue?	Considered Medium impact, mostly due to potential for re-work between Traders where estimates are still used and can lead to a negative experience for customers. Impact to wider market settlement function considered minor.	Noted
Electric Kiwi	Issue 3, Q3. How material is this issue?	<p>As a trader who is only permitted to reconcile on HHR data and only accepts switching ICPs with communicating AMI meters, we consider this a major issue within the existing switching process. Upon review of the EDA file between 1/1/2018 and 25/10/2018, 28.1% of reads sent to us from the losing trader in the CS files were estimates. On the contrast, only 1.8% of all CS files we have sent in the same timeframe as the losing trader were estimates.</p> <p>This highlights a huge opportunity for improvement in the processes followed by other traders. When estimates are sent in the CS file, it adds considerable operation load to the gaining trader to validate the CS reads and puts them at risk of being non-compliant if they are unable to send a replacement read within 5 business days. This is especially difficult when the losing trader receives an NTMI for 5 business days in the future and therefore will never have actuals by the time they need to complete the switch.</p> <p>We believe that this issue could be addressed in a number of</p>	

Submitter	Question	Submission	Authority response
		<p>ways:</p> <p>1) MEP required to provide midnight read on switch date to registry, gaining trader, and losing trader within 5 business days of NT received (Preferred)</p> <p>2) Allowing traders up to 10 business days to submit a replacement read</p> <p>3) MEP to provide start read to gaining trader within 5 business days (down from 10)</p> <p>4) If the ICP has a communicating AMI meter, the losing trader must submit an actual midnight read. If actual reads are unavailable, then the AMI Comms Flag must be set to N</p> <p>5) Switch completion deadline to be 5 business days after the greater of the proposed effective date or today, not NT received date</p>	<p>Noted. This is included in Issue 3</p> <p>Noted. This is included in Issue 15</p> <p>Noted. This is included in Issue 4</p> <p>Noted. This is included in Issue 3</p> <p>Noted. This is included in Issue 35</p>
Flick Energy	Issue 3, Q3. How material is this issue?	<p>This has a significant negative impact on Flick's operational efficiency as an average of 20% of CS reads received by Flick are rejected due to either CS readings being estimate or actual read from another date being submitted in the CS file.</p> <p>Flick bills customers on the actual read at 00.00 hours gained on the event date. This correctly reflects the start read of the customer but due to other retailers submitting estimate reads in the CS file 20% of the daily CS reads goes through the RR process. This causes operational inefficiency and seems like Flick is being penalised for being accurate. We think that EA should support innovation and accuracy and implement changes through the code to ensure that all CS reads from smart meters are midnight stamped and for the event date.</p>	Noted. This is included in Issue 5
Genesis	Issue 3, Q3. How	<i>This relates to issues 6 and 10</i>	Noted. This is included in Issue

Submitter	Question	Submission	Authority response
Energy	material is this issue?	<p>This issue only occurs when the losing trader uses non-half hour metering data (NHH) and the gaining trader requires HHR data. While the differences may be small, the frequency is likely a concern for these gaining traders.</p> <p>As this issue only occurs when there is an advanced meter (AMI) at the ICP, in our view it can be resolved by having the meter equipment provider (MEP) determine and supply the switch event read to both parties via the registry and switch files.</p>	3
IntelliHub	Issue 3, Q3. How material is this issue?	No comment to add	
Mercury	Issue 3, Q3. How material is this issue?	Very Material	Noted
Meridian and Powershop	Issue 3, Q3. How material is this issue?	Meridian / Powershop considers the issue is reasonably material.	Noted
Metrix	Issue 3, Q3. How material is this issue?		
Northpower	Issue 3, Q3. How material is this issue?		
Nova Energy	Issue 3, Q3. How material is this issue?	For reconciliation and billing purposes, resolution on this issue is very material to both Traders and customers. There is often confusion/delays on whether MEPs are allowed to provide midnight reads to gaining retailers or whether this is counted as commercially sensitive information and can only be provided to the Trader responsible for the ICP on the Registry for the date in questions, despite the Code stating both Traders must use the	Noted. This has been included in Issue 3

Submitter	Question	Submission	Authority response
		same reading.	
Orion Energy	Issue 3, Q3. How material is this issue?		
Powerco	Issue 3, Q3. How material is this issue?		
Simply Energy	Issue 3, Q3. How material is this issue?	This is very material. A large percentage of the switch ins have estimated reads which has knock on impacts to the switch challenge read process.	Noted
Tenco	Issue 3, Q3. How material is this issue?		
Trustpower	Issue 3, Q3. How material is this issue?	High	Noted
Unison Networks	Issue 3, Q3. How material is this issue?		
Vector	Issue 3, Q3. How material is this issue?		
Wellington Electricity	Issue 3, Q3. How material is this issue?		
Issue 3: Gaining traders face difficulties ensuring accurate switch event meter readings Q4. Is this issue getting worse?			
Contact Energy	Issue 3, Q4. Is this issue getting worse?	The issue is ongoing, however will hopefully improve over time or alternatively if MEPs provide switch meter readings.	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 3, Q4. Is this issue getting worse? occurring?	<p>As a trader who is only permitted to reconcile on HHR data and only accepts switching ICPs with communicating AMI meters, we consider this a major issue within the existing switching process. Upon review of the EDA file between 1/1/2018 and 25/10/2018, 28.1% of reads sent to us from the losing trader in the CS files were estimates. On the contrast, only 1.8% of all CS files we have sent in the same timeframe as the losing trader were estimates.</p> <p>This highlights a huge opportunity for improvement in the processes followed by other traders. When estimates are sent in the CS file, it adds considerable operation load to the gaining trader to validate the CS reads and puts them at risk of being non-compliant if they are unable to send a replacement read within 5 business days. This is especially difficult when the losing trader receives an NTMI for 5 business days in the future and therefore will never have actuals by the time they need to complete the switch.</p> <p>We believe that this issue could be addressed in a number of ways:</p> <ol style="list-style-type: none"> 1) MEP required to provide midnight read on switch date to registry, gaining trader, and losing trader within 5 business days of NT received (Preferred) 2) Allowing traders up to 10 business days to submit a replacement read 3) MEP to provide start read to gaining trader within 5 business days (down from 10) 4) If the ICP has a communicating AMI meter, the losing trader must submit an actual midnight read. If actual reads are 	Noted. See response above

Submitter	Question	Submission	Authority response
		unavailable, then the AMI Comms Flag must be set to N 5) Switch completion deadline to be 5 business days after the greater of the proposed effective date or today, not NT received date	
Flick Energy	Issue 3, Q4. Is this issue getting worse?	Yes, this issue is getting worse, as there are no code implications of sending estimate reads.	Noted
Genesis Energy	Issue 3, Q4. Is this issue getting worse?	<i>This relates to issues 6 and 10</i> The frequency of occurrences will be directly related to the market activity of HHR gaining traders.	Noted
IntelliHub	Issue 3, Q4. Is this issue getting worse?		
Mercury	Issue 3, Q4. Is this issue getting worse?	At the same levels (so not getting worse but remains an issue)	Noted
Meridian and Powershop	Issue 3, Q4. Is this issue getting worse?	Yes.	Noted
Metrix	Issue 3, Q4. Is this issue getting worse?		
Northpower	Issue 3, Q4. Is this issue getting worse?		
Nova Energy	Issue 3, Q4. Is this issue getting worse?	No, as more Traders are using AMI reads there are less estimates being used. However, this will continue to be an issue while Traders are trying to balance completing switches within compliance timeframes with gaining reads from MEPs and inserting those reads into the switching files/billing systems.	Noted

Submitter	Question	Submission	Authority response
Orion Energy	Issue 3, Q4. Is this issue getting worse?		
Powerco	Issue 3, Q4. Is this issue getting worse?		
Simply Energy	Issue 3, Q4. Is this issue getting worse?	Yes, there has been no reduction on switch read estimates in the past two years.	Noted
Tenco	Issue 3, Q4. Is this issue getting worse?		
Trustpower	Issue 3, Q4. Is this issue getting worse?	Yes	Noted
Unison Networks	Issue 3, Q4. Is this issue getting worse?		
Vector	Issue 3, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 3, Q4. Is this issue getting worse?		
Issue 3: Gaining traders face difficulties ensuring accurate switch event meter readings Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 3, Q5. Why do you think this issue is occurring?	As illustrated in the issues paper, some Traders either do not have agreement with the MEP to obtain AMI readings or have not implemented functionality to use this in their billing and switching processes.	Noted. This has been included in Issue 5

Submitter	Question	Submission	Authority response
		<p>Contact would also like to note that another reason for estimates being used in the switching process (under 4.22 in the issues paper) is delays in receiving AMI readings from the MEP. I.e. In some cases (admittedly low volume) we will not receive an AMI reading within the required switching timeframe and will release the switch on an estimated reading.</p>	
Electric Kiwi	Issue 3, Q5. Why do you think this issue is occurring?	<p>As a trader who is only permitted to reconcile on HHR data and only accepts switching ICPs with communicating AMI meters, we consider this a major issue within the existing switching process. Upon review of the EDA file between 1/1/2018 and 25/10/2018, 28.1% of reads sent to us from the losing trader in the CS files were estimates. On the contrast, only 1.8% of all CS files we have sent in the same timeframe as the losing trader were estimates.</p> <p>This highlights a huge opportunity for improvement in the processes followed by other traders. When estimates are sent in the CS file, it adds considerable operation load to the gaining trader to validate the CS reads and puts them at risk of being non-compliant if they are unable to send a replacement read within 5 business days. This is especially difficult when the losing trader receives an NTMI for 5 business days in the future and therefore will never have actuals by the time they need to complete the switch.</p> <p>We believe that this issue could be addressed in a number of ways:</p> <p>1) MEP required to provide midnight read on switch date to registry, gaining trader, and losing trader within 5 business days of NT received (Preferred)</p>	Noted. See response above

Submitter	Question	Submission	Authority response
		<p>2) Allowing traders up to 10 business days to submit a replacement read</p> <p>3) MEP to provide start read to gaining trader within 5 business days (down from 10)</p> <p>4) If the ICP has a communicating AMI meter, the losing trader must submit an actual midnight read. If actual reads are unavailable, then the AMI Comms Flag must be set to N</p> <p>5) Switch completion deadline to be 5 business days after the greater of the proposed effective date or today, not NT received date</p>	
Flick Energy	Issue 3, Q5. Why do you think this issue is occurring?	<p>There are no obligations on sending actual reads in the CS file even if the retailers have access to actual reads through their metering companies.</p> <p>Also there is no obligations under the code for the MEP's to supply actual midnight reads to traders with AMI meters.</p>	<p>Noted. This is included in Issue 5</p> <p>Noted. This is included in Issue 5</p>
Genesis Energy	Issue 3, Q5. Why do you think this issue is occurring?	<p><i>This relates to issues 6 and 10</i></p> <p>See response to Q2.</p>	Noted
IntelliHub	Issue 3, Q5. Why do you think this issue is occurring?		
Mercury	Issue 3, Q5. Why do you think this issue is occurring?	<p>Q5. Why do you think this issue is occurring?</p> <p>4.23 -</p> <p>MEP's do not provide reads at the time of the switch, it is the losing retailers who are required to provide it.</p>	Noted. This is included in Issue 3

Submitter	Question	Submission	Authority response
		<p>We all have different arrangements half hourly etc. The MEP should be taking responsibility for switch readings which means they would be the one source of truth rather than 2 different parties trying to agree.</p> <p>Would be more accurate for the retailer to put TR date then MEP to populate the read.</p> <p>4.24</p> <p>Day event rather than time. This is a significant issue. If we switch out at 10am then we are provided a midnight reading the differential problem is obvious. As indicated primarily with HHR or smart meters is where the time slice can cause a problem.</p> <p>Should be up to the retailer or a threshold set as to what is accepted as sometimes there is no point amending the read. If all retailers rebilled it for 1 or 2 units it could be seen as an adverse customer experience with no real material benefit for either party.</p> <p>4.25</p> <p>It needs to be both ways. The losing retailer should also be able to trigger read notifications. It takes a lot of time to resolve these issues.</p> <p>A possible solution is to introduce a disputes threshold (so number of units).</p> <p>Also a 5 day rule to accept/reject the dispute</p> <p>4 month rule should be removed or extend (to say 10 months)</p> <p>This has always has been an issue and see our response to issue 16 for further details.</p>	<p>Noted. This is included in Issue 15</p> <p>Noted. This is included in Issue 15</p> <p>Noted. This is included in Issue 15</p> <p>Noted. This is partly addressed in Issue 15</p>

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 3, Q5. Why do you think this issue is occurring?	With the saturation of AMI meters across the country, and not all participants having access to HH data or midnight reads. The other consideration is that there are two ways to settlement NHH ICP's and this has introduced another layer of complexity/increase in the read replacement process being initiated.	Noted. This can be addressed in a number of ways, and is included in Issue 5
Metrix	Issue 3, Q5. Why do you think this issue is occurring?		
Northpower	Issue 3, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 3, Q5. Why do you think this issue is occurring?	There can be delays in receiving the actual reads from MEPs for Smart Meters, and rather than delay the switching process estimates are instead used. The way the code is written currently you cannot change the effective date to one earlier than requested, so the losing Trader cannot change to their last actual read date.	Noted. Changing the switch event date to an earlier date will introduce many other problems
Orion Energy	Issue 3, Q5. Why do you think this issue is occurring?		
Powerco	Issue 3, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 3, Q5. Why do you think this issue is	Either traders don't receive daily reads or they do get them but don't use them for switching.	Noted. This is included in Issue 3

Submitter	Question	Submission	Authority response
	occurring?		
Tenco	Issue 3, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 3, Q5. Why do you think this issue is occurring?	<ul style="list-style-type: none"> • More traders are submitting HH • Number of meters • Increase in switches • More HH submissions • Ensuring final estimates are correct for legacy meters 	Noted
Unison Networks	Issue 3, Q5. Why do you think this issue is occurring?		
Vector	Issue 3, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 3, Q5. Why do you think this issue is occurring?		
Issue 4: A trader should not have to issue a switch completion notification for an ICP with only unmetered load Q3. How material is this issue?			
Contact Energy	Issue 4, Q3. How material is this issue?	Not considered a significant issue.	Noted. This issue has been deleted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 4, Q3. How material is this issue?	We do not accept UML only ICPs. We have no comment on this issue.	Noted. This issue has been deleted
Flick Energy	Issue 4, Q3. How material is this issue?	This issue does not impact Flick as we do not retail on unmetered ICPs.	Noted. This issue has been deleted
Genesis Energy	Issue 4, Q3. How material is this issue?	<p>In our view, traders should not be required to provide data [to facilitate an ICP switch] that is already stored in the registry and will not change as consequence of the switch.</p> <p>We consider changing the switch process to allow automatic completion by the registry on solely unmetered ICPs is likely to be an efficiency gain overall, and will prevent any discrepancies between the losing trader's data and the registry being passed on.</p>	Noted. This issue has been deleted
IntelliHub	Issue 4, Q3. How material is this issue?	No comment to add	
Mercury	Issue 4, Q3. How material is this issue?	Mercury does not see this as a significant issue	Noted. This issue has been deleted
Meridian and Powershop	Issue 4, Q3. How material is this issue?	Unsure.	Noted. This issue has been deleted
Metrix	Issue 4, Q3. How material is this issue?		
Northpower	Issue 4, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Nova Energy	Issue 4, Q3. How material is this issue?	Not highly material, as volumes of ICPs with only unmetered load is small. However, the Code would need to reflect the withdrawal process and timeframes for this with the switching process changed.	Noted. This issue has been deleted
Orion Energy	Issue 4, Q3. How material is this issue?		
Powerco	Issue 4, Q3. How material is this issue?		
Simply Energy	Issue 4, Q3. How material is this issue?		
Tenco	Issue 4, Q3. How material is this issue?		
Trustpower	Issue 4, Q3. How material is this issue?	Low	Noted. This issue has been deleted
Unison Networks	Issue 4, Q3. How material is this issue?		
Vector	Issue 4, Q3. How material is this issue?		
Wellington Electricity	Issue 4, Q3. How material is this issue?		
Issue 4: A trader should not have to issue a switch completion notification for an ICP with only unmetered load Q4. Is this issue getting worse?			

Submitter	Question	Submission	Authority response
Contact Energy	Issue 4, Q4. Is this issue getting worse?	No	Noted. This issue has been deleted
Electric Kiwi	Issue 4, Q4. Is this issue getting worse?	We do not accept UML only ICPs. We have no comment on this issue.	Noted. This issue has been deleted
Flick Energy	Issue 4, Q4. Is this issue getting worse?		
Genesis Energy	Issue 4, Q4. Is this issue getting worse?	It is static.	Noted. This issue has been deleted
IntelliHub	Issue 4, Q4. Is this issue getting worse?		
Mercury	Issue 4, Q4. Is this issue getting worse?	No	Noted. This issue has been deleted
Meridian and Powershop	Issue 4, Q4. Is this issue getting worse?	Not to our knowledge	Noted. This issue has been deleted
Metrix	Issue 4, Q4. Is this issue getting worse?		
Northpower	Issue 4, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Nova Energy	Issue 4, Q4. Is this issue getting worse?	No	Noted. This issue has been deleted
Orion Energy	Issue 4, Q4. Is this issue getting worse?		
Powerco	Issue 4, Q4. Is this issue getting worse?		
Simply Energy	Issue 4, Q4. Is this issue getting worse?		
Tenco	Issue 4, Q4. Is this issue getting worse?		
Trustpower	Issue 4, Q4. Is this issue getting worse?	No	Noted. This issue has been deleted
Unison Networks	Issue 4, Q4. Is this issue getting worse?		
Vector	Issue 4, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 4, Q4. Is this issue getting worse?		
Issue 4: A trader should not have to issue a switch completion notification for an ICP with only unmetered load Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 4, Q5. Why do you think this issue is	Contact supports considering efficiency options around provision of a switch completion file for unmetered load ICPs. Contact has	Noted. This issue has been deleted

Submitter	Question	Submission	Authority response
	occurring?	<p>one minor concern that removing this step in the process (losing trader completing the switch) has the potential to replace one problem with another. I.e. The losing trader could be impacted by a processing error on the gaining trader's behalf. Consideration would also need to be given to the parameters of when a gaining trader could request an unmetered switch. If the losing trader does not have a say in agreeing a date the new process could potentially result in Traders contract and billing dates overlapping.</p> <p>In summary, Contact considers that the benefits of resolving this efficiency issue are potentially outweighed by the negatives or there is the possibility the proposal will result in further unnecessary system enhancements to meet new requirements, therefore the status quo should remain. We would also presume that most traders systems are built to deal with unmetered switching automatically, or in the very least processing an unmetered ICP switch. This isn't labour intensive but maybe trying to fix something that isn't necessarily broken.</p>	
Electric Kiwi	Issue 4, Q5. Why do you think this issue is occurring?	We do not accept UML only ICPs. We have no comment on this issue.	Noted. This issue has been deleted
Flick Energy	Issue 4, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Genesis Energy	Issue 4, Q5. Why do you think this issue is occurring?	There is currently no differentiation in the process between metered and unmetered ICPs.	Noted. This issue has been deleted
IntelliHub	Issue 4, Q5. Why do you think this issue is occurring?		
Mercury	Issue 4, Q5. Why do you think this issue is occurring?	As long as the unmetered load is available on the registry MEEN are able to set up at our end.	Noted. This issue has been deleted
Meridian and Powershop	Issue 4, Q5. Why do you think this issue is occurring?	Unsure.	Noted. This issue has been deleted
Metrix	Issue 4, Q5. Why do you think this issue is occurring?		
Northpower	Issue 4, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 4, Q5. Why do you think this issue is occurring?	NA	
Orion Energy	Issue 4, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Powerco	Issue 4, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 4, Q5. Why do you think this issue is occurring?		
Tenco	Issue 4, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 4, Q5. Why do you think this issue is occurring?	Unmetered switches are managed under the normal metered process and see no need to change this.	Noted. This issue has been deleted
Unison Networks	Issue 4, Q5. Why do you think this issue is occurring?		
Vector	Issue 4, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 4, Q5. Why do you think this issue is occurring?		
Issue 5: A gaining trader may face a delay receiving the first AMI meter reading for the ICP it has gained Q3. How material is this issue?			

Submitter	Question	Submission	Authority response
Contact Energy	Issue 5, Q3. How material is this issue?	High impact	Noted
Electric Kiwi	Issue 5, Q3. How material is this issue?	<p>This is one of the biggest pain points of the switching process to date. It can create a very negative first impression to the customer, which the trader has no control over. Recent analysis of our data indicates that for 7.5% of switches to ELKI, we do not receive actual AMI reads with 5 business days after the switch completion.</p> <p>We believe the simplest and most immediate solution to this issue is extending the timeframe in Part 11 Schedule 11.3 Clauses 6(3) and 12(2B) from 5 business days to 10 business days. This would align with the current 10 business days the MEP has to send the read to the trader. Ideally, the MEP would be required to send reads to the gaining trader within 5 business days instead of 10. As mentioned in the response to issue 3, we believe the preferred solution in which an MEP is responsible for providing the switch read is the best solution for the industry.</p>	Noted. This is included in Issue 15
Flick Energy	Issue 5, Q3. How material is this issue?	<p>The delay in AMI meter reads affects the RR process directly. This is due to non-alignment of timeframes between data delivery (10 business days) and the RR process (5 business days). This may lead to consumption being unreconciled to the market or customers being billed on incorrect consumption.</p> <p>Delay in AMI meter reads also causes delays to customers first bill and thus customer has negative first experience.</p>	Noted. This is included in Issue 4
Genesis Energy	Issue 5, Q3. How material is this issue?	<p><i>This relates to issues 2 and 16</i></p> <p>Genesis considers the timing of the delivery of data for a service agreed between a trader and an MEP should fall under the</p>	Noted

Submitter	Question	Submission	Authority response
		commercial arrangement agreed. In our view, any mandated minimum delivery period may have perverse effects.	
IntelliHub	Issue 5, Q3. How material is this issue?	Medium	Noted
Mercury	Issue 5, Q3. How material is this issue?	Yes, this is an issue because of the constant switching	Noted
Meridian and Powershop	Issue 5, Q3. How material is this issue?	Unsure.	Noted
Metrix	Issue 5, Q3. How material is this issue?		
Northpower	Issue 5, Q3. How material is this issue?		
Nova Energy	Issue 5, Q3. How material is this issue?	Moderately material, it needs to be noted that gaining AMI reads as a norm can take up to 5 business days to obtain, though this is not always the case and some AMI reads are not supplied until the following month after the switch has been completed and all parties notified and even at 5 business days, this causes definite issues for the gaining Trader needing to revise the switch event meter reading (it would be suggested that the time frames are reversed here: I.E: 5:4.30(b) changed from 10 business days to 5 business days maximum and 5:4.32(b) changed from 5 business days to 10 business days)	Noted. This is included in Issue 15
Orion Energy	Issue 5, Q3. How		

Submitter	Question	Submission	Authority response
	material is this issue?		
Powerco	Issue 5, Q3. How material is this issue?		
Simply Energy	Issue 5, Q3. How material is this issue?	This is material, it can be over five days before an AMI read is received from some MEPS.	Noted. This is included in Issue 15
Tenco	Issue 5, Q3. How material is this issue?		
Trustpower	Issue 5, Q3. How material is this issue?	Low	Noted
Unison Networks	Issue 5, Q3. How material is this issue?		
Vector	Issue 5, Q3. How material is this issue?		
Wellington Electricity	Issue 5, Q3. How material is this issue?		
Issue 5: A gaining trader may face a delay receiving the first AMI meter reading for the ICP it has gained Q4. Is this issue getting worse?			
Contact Energy	Issue 5, Q4. Is this issue getting worse?	Not necessarily getting worse, however high in volume	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 5, Q4. Is this issue getting worse?	<p>This is one of the biggest pain points of the switching process to date. It can create a very negative first impression to the customer, which the trader has no control over. Recent analysis of our data indicates that for 7.5% of switches to ELKI, we do not receive actual AMI reads with 5 business days after the switch completion.</p> <p>We believe the simplest and most immediate solution to this issue is extending the timeframe in Part 11 Schedule 11.3 Clauses 6(3) and 12(2B) from 5 business days to 10 business days. This would align with the current 10 business days the MEP has to send the read to the trader. Ideally, the MEP would be required to send reads to the gaining trader within 5 business days instead of 10. As mentioned in the response to issue 3, we believe the preferred solution in which an MEP is responsible for providing the switch read is the best solution for the industry.</p>	Noted. Refer to response above
Flick Energy	Issue 5, Q4. Is this issue getting worse?	Yes, with retailers offering more timely billing options (eg. Weekly and potentially real time in the future) the issue will become more prominent. We also see significant operational impacts when unexpected communication issues occur for example the 2Degrees network shutdown which impacted a significant number of meters.	Noted
Genesis Energy	Issue 5, Q4. Is this issue getting worse?	<p><i>This relates to issues 2 and 16</i></p> <p>We are unaware if this is the case.</p>	Noted
IntelliHub	Issue 5, Q4. Is this issue getting worse?	No comment to add	
Mercury	Issue 5, Q4. Is this issue getting worse?	Mercury is not sure if the issue is getting worse but it is a re-occurring issue we have always had to deal with	Noted

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 5, Q4. Is this issue getting worse?	Unsure.	Noted
Metrix	Issue 5, Q4. Is this issue getting worse?		
Northpower	Issue 5, Q4. Is this issue getting worse?		
Nova Energy	Issue 5, Q4. Is this issue getting worse?		
Orion Energy	Issue 5, Q4. Is this issue getting worse?		
Powerco	Issue 5, Q4. Is this issue getting worse?		
Simply Energy	Issue 5, Q4. Is this issue getting worse?	No, but no improvement either.	Noted
Tenco	Issue 5, Q4. Is this issue getting worse?		
Trustpower	Issue 5, Q4. Is this issue getting worse?	No	Noted
Unison Networks	Issue 5, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Vector	Issue 5, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 5, Q4. Is this issue getting worse?		
Issue 5: A gaining trader may face a delay receiving the first AMI meter reading for the ICP it has gained Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 5, Q5. Why do you think this issue is occurring?	<p>Contact considers that overall most MEPs attempt to provide AMI meter readings or data within an acceptable timeframe. Contact is still experiencing a reasonably high number of cases where the MEP is failing to provide AMI meter readings (and HHR data) for ICP switches, especially when applying this from the switch event date (which can often be backdated). While this is largely commercially agreed and not contained within the Code, the reliance on AMI metering readings and HHR data is becoming more critical to enable better experiences and options for customers. While we understand that some MEPs are actively working towards improving such functions to enable more efficient and effective systems to provide AMI meter readings and HHR data, it would make sense to firm up the requirement for MEPs to provide this critical data within the Code Itself. This wouldn't necessarily be a requirement to provide all Traders AMI meter readings or HHR data, it would essentially reinforce any commercial arrangements Traders and MEPs have to ensure Traders were delivered the commercially agreed data in a prescribed timeframe.</p>	Noted. This is included in Issues 4 and 23

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 5, Q5. Why do you think this issue is occurring?	<p>This is one of the biggest pain points of the switching process to date. It can create a very negative first impression to the customer, which the trader has no control over. Recent analysis of our data indicates that for 7.5% of switches to ELKI, we do not receive actual AMI reads with 5 business days after the switch completion.</p> <p>We believe the simplest and most immediate solution to this issue is extending the timeframe in Part 11 Schedule 11.3 Clauses 6(3) and 12(2B) from 5 business days to 10 business days. This would align with the current 10 business days the MEP has to send the read to the trader. Ideally, the MEP would be required to send reads to the gaining trader within 5 business days instead of 10. As mentioned in the response to issue 3, we believe the preferred solution in which an MEP is responsible for providing the switch read is the best solution for the industry.</p>	Noted. Refer to response above
Flick Energy	Issue 5, Q5. Why do you think this issue is occurring?	<p>The MEP's also do not provide data/readings for backdated switches in a timely manner</p> <p>The code is inconsistent as the regulatory timeframe between MEP data delivery which is 10 business days and replacement read process which is 5 business days do not align with each other. The RR process is solely dependent on the MEP data delivery.</p>	Noted. This is included in Issues 4 and 23
Genesis Energy	Issue 5, Q5. Why do you think this issue is occurring?	<p><i>This relates to issues 2 and 16</i></p> <p>See response to Q2.</p>	Noted
IntelliHub	Issue 5, Q5. Why do you think this issue is	<ol style="list-style-type: none"> 1. Backdated switches could cause delays for the MEP to supply reads. 	Noted

Submitter	Question	Submission	Authority response
	occurring?	<p>2. Contracts not in place with MEP and gaining Trader.</p> <p>3. No Comms flag on the Registry not utilised.</p>	
Mercury	Issue 5, Q5. Why do you think this issue is occurring?	<p>Because the MEP is only noted for the switch after an ICP has switched to another retailer and so the trader switches out on estimated reads. The trader then only receives the AMI reads within a week or more of the site switching to another retailer. However this is dependant upon the agreement with the MEP.</p> <p>See our response to issue 16.</p>	Noted. This is included in Issue 4
Meridian and Powershop	Issue 5, Q5. Why do you think this issue is occurring?	Unsure.	Noted
Metrix	Issue 5, Q5. Why do you think this issue is occurring?		
Northpower	Issue 5, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 5, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 5, Q5. Why do you think this issue is occurring?		
Powerco	Issue 5, Q5. Why do you		

Submitter	Question	Submission	Authority response
	think this issue is occurring?		
Simply Energy	Issue 5, Q5. Why do you think this issue is occurring?	The Code is too relaxed in time for MEP's to provide data, it should be stricter.	Noted. This is included in Issue 4
Tenco	Issue 5, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 5, Q5. Why do you think this issue is occurring?	Contractual agreements, non-communicating AML.	Noted. This is included in Issue 26
Unison Networks	Issue 5, Q5. Why do you think this issue is occurring?		
Vector	Issue 5, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 5, Q5. Why do you think this issue is occurring?		
Issue 6: AML switch event meter readings are not necessarily midnight meter readings Q3. How material is this issue?			
Contact Energy	Issue 6, Q3. How material is this issue?	Potentially medium impact	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 6, Q3. How material is this issue?	<p>When a losing trader does not provide a midnight read for a communicating AML meter and refuses to accept a replacement read, it puts the gaining trader in breach situation which they have no control over. If the ICP has an AML meter, reads should be actual midnight reads and both traders should use them.</p> <p>However, as mentioned in other issues, the ideal solution to this issue is that the MEP provides the switch read to the registry, and both the gaining and losing traders.</p>	Noted. This is included in Issue 3
Flick Energy	Issue 6, Q3. How material is this issue?	<p>This creates inefficiency in the RR process especially where there is significant consumption difference between the midnight read for the event date and the CS actual read which is from anytime of the day. The reads cannot be rejected under the code due to it being an actual read for the event date.</p> <p>As both reads are actual and for the event date, retailers are confused on which read to use as their start read for their customer.</p> <p>This confusion and complication may lead to the consumption difference not being reconciled to the market.</p>	Noted. This is included in Issue 5
Genesis Energy	Issue 6, Q3. How material is this issue?	<p><i>This relates to issues 3, 10, 12, 14 and 16</i></p> <p>This issue results from instances of issue #3 described above and as such has the same solution.</p> <p>We consider read time could be supplied in addition to switch event reads so that HHR gaining or losing traders know what periods to begin or cease trading (respectively).⁴</p>	Noted. This is included in Issue 5

⁴ We note that timing differences are relevant in HHR/HHR switches as well as NHH/HHR switches.

Submitter	Question	Submission	Authority response
IntelliHub	Issue 6, Q3. How material is this issue?		
Mercury	Issue 6, Q3. How material is this issue?	This is a present issue as some AMI reads are not at midnight The CS is not sent at midnight.	Noted. This is included in Issue 5
Meridian and Powershop	Issue 6, Q3. How material is this issue?	Reasonably material in our view.	Noted
Metrix	Issue 6, Q3. How material is this issue?		
Northpower	Issue 6, Q3. How material is this issue?		
Nova Energy	Issue 6, Q3. How material is this issue?	For reconciliation and invoice purposes this is highly material. As HHR becomes more prevalent having switch reads that do not line up with the switch effective time of midnight (00:00) causes issues in what to do with the consumption between the gaining read time and midnight. Losing retailers are then reluctant to amend the gaining read to the midnight read when there is minimal usage.	Noted. This is included in Issue 5
Orion Energy	Issue 6, Q3. How material is this issue?		
Powerco	Issue 6, Q3. How material is this issue?		
Simply Energy	Issue 6, Q3. How		

Submitter	Question	Submission	Authority response
	material is this issue?		
Tenco	Issue 6, Q3. How material is this issue?		
Trustpower	Issue 6, Q3. How material is this issue?	High	Noted
Unison Networks	Issue 6, Q3. How material is this issue?		
Vector	Issue 6, Q3. How material is this issue?		
Wellington Electricity	Issue 6, Q3. How material is this issue?		
Issue 6: AMI switch event meter readings are not necessarily midnight meter readings Q4. Is this issue getting worse?			
Contact Energy	Issue 6, Q4. Is this issue getting worse?	Not necessarily getting worse, however high in volume	Noted
Electric Kiwi	Issue 6, Q4. Is this issue getting worse?	<p>When a losing trader does not provide a midnight read for a communicating AMI meter and refuses to accept a replacement read, it puts the gaining trader in breach situation which they have no control over. If the ICP has an AMI meter, reads should be actual midnight reads and both traders should use them.</p> <p>However, as mentioned in other issues, the ideal solution to this issue is that the MEP provides the switch read to the registry, and both the gaining and losing traders.</p>	Noted. Refer to response above

Submitter	Question	Submission	Authority response
Flick Energy	Issue 6, Q4. Is this issue getting worse?	Yes, with more retailers now choosing to send estimate or actual read from anytime of the day in the CS file rather than using the midnight read being available to them.	Noted
Genesis Energy	Issue 6, Q4. Is this issue getting worse?	<i>This relates to issues 3, 10, 12, 14 and 16</i> We consider this issue will get worse as more traders use HHR data.	Noted
IntelliHub	Issue 6, Q4. Is this issue getting worse?		
Mercury	Issue 6, Q4. Is this issue getting worse?	Yes. it is as it also creates RR for 1-2 kw	Noted
Meridian and Powershop	Issue 6, Q4. Is this issue getting worse?	Yes.	Noted
Metrix	Issue 6, Q4. Is this issue getting worse?		
Northpower	Issue 6, Q4. Is this issue getting worse?		
Nova Energy	Issue 6, Q4. Is this issue getting worse?	Yes, due to industry movement towards HHR and billing offers/opportunities that HHR provides.	Noted
Orion Energy	Issue 6, Q4. Is this issue getting worse?		
Powerco	Issue 6, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Simply Energy	Issue 6, Q4. Is this issue getting worse?		
Tenco	Issue 6, Q4. Is this issue getting worse?		
Trustpower	Issue 6, Q4. Is this issue getting worse?	Yes	Noted
Unison Networks	Issue 6, Q4. Is this issue getting worse?		
Vector	Issue 6, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 6, Q4. Is this issue getting worse?		
Issue 6: AMI switch event meter readings are not necessarily midnight meter readings Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 6, Q5. Why do you think this issue is occurring?	<p>Contact agrees with the commentary or findings associated with issue 6 and have also encountered scenarios where certain batches of AMI devices have been programmed incorrectly (sometimes errors in relation to daylight saving) that result in switch event meter reading errors.</p> <p>Contact considers that such errors should be resolved at the source and emphasis should be placed on the MEPs data quality. While some Traders have implemented validations and processes to identify such anomalies, it is not efficient to handle the volumes we're encountering manually and is costly and</p>	Noted

Submitter	Question	Submission	Authority response
		<p>complex to implement an automated solution.</p> <p>Despite the above comments. Contact considers the overall impact to market to be minimal on an individual basis, however could be relatively sizeable depending on the volume of both the total ICPs and kWh differences. It's possible that the differences in total are also minor as there will be overs and unders.</p>	
Electric Kiwi	Issue 6, Q5. Why do you think this issue is occurring?	<p>When a losing trader does not provide a midnight read for a communicating AMI meter and refuses to accept a replacement read, it puts the gaining trader in breach situation which they have no control over. If the ICP has an AMI meter, reads should be actual midnight reads and both traders should use them.</p> <p>However, as mentioned in other issues, the ideal solution to this issue is that the MEP provides the switch read to the registry, and both the gaining and losing traders.</p>	Noted. Refer to response above
Flick Energy	Issue 6, Q5. Why do you think this issue is occurring?	<p>The retailers are not obligated to use the midnight AMI read for switching events and thus the retailers do not use this even if they do have access to the midnight read.</p> <p>The actual read is not defined as midnight read in the code. The actual read is thus perceived as either being midnight read or an actual read from anytime of the day.</p>	Noted. This is included in Issue 5
Genesis Energy	Issue 6, Q5. Why do you think this issue is occurring?	<p><i>This relates to issues 3, 10, 12, 14 and 16</i></p> <p>See response to Q2.</p>	Noted
IntelliHub	Issue 6, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Mercury	Issue 6, Q5. Why do you think this issue is occurring?	<p>AMI data versus manual data & also depending on MEP contractual agreements.</p> <p>More traders are on HHR and some incumbents are still on NHH which is why the issue is growing.</p>	Noted
Meridian and Powershop	Issue 6, Q5. Why do you think this issue is occurring?	With the number of traders settling NHH ICP's as HHR, there is a need for the "midnight" read to be used. There is also an issue with receiving "historic" data on a backdated switch.	Noted. This is included in Issue 5
Metrix	Issue 6, Q5. Why do you think this issue is occurring?		
Northpower	Issue 6, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 6, Q5. Why do you think this issue is occurring?	<p>Multiple factors including;</p> <ul style="list-style-type: none"> • Traders wanting to use customer gained reads for invoicing which are not likely to be midnight reads • Traders not wanting to keep consumption that they cannot invoice for • System limitations are a possibility 	Noted
Orion Energy	Issue 6, Q5. Why do you think this issue is occurring?		
Powerco	Issue 6, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
Simply Energy	Issue 6, Q5. Why do you think this issue is occurring?		
Tenco	Issue 6, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 6, Q5. Why do you think this issue is occurring?	System processes were not designed for handling AMI midnight readings and final dates on matching switching event dates. AMI readings have at least a 2-day delay.	Noted. This is included in Issue 5
Unison Networks	Issue 6, Q5. Why do you think this issue is occurring?		
Vector	Issue 6, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 6, Q5. Why do you think this issue is occurring?		
Issue 7: Interpreting trader ICP switching as customer or embedded generator switching may be misleading			
Q3. How material is this issue?			
Contact Energy	Issue 7, Q3. How material is this issue?	Low impact	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 7, Q3. How material is this issue?	We agree that this is an issue, and it would be beneficial to the industry to understand ICP transfers versus customer transfers. We would prefer that any changes required to produce this are simple and easy to integrate into participants' systems. One solution could be the use of a new switch type.	Noted. This would not address the issue of a move in instance where there was no change of trader in the registry
Flick Energy	Issue 7, Q3. How material is this issue?	Currently this is not an issue with Flick.	Noted
Genesis Energy	Issue 7, Q3. How material is this issue?	This is a common issue throughout industry that could be mitigated by having the switch request file include an indicator as to whether the ICP switch is a consequence of obtaining a new customer.	Noted. This would not address the issue of a move in instance where there was no change of trader in the registry
IntelliHub	Issue 7, Q3. How material is this issue?		
Mercury	Issue 7, Q3. How material is this issue?		
Meridian and Powershop	Issue 7, Q3. How material is this issue?	In so far as the operation of the switching process, we do not believe this is a material issue.	Noted
Metrix	Issue 7, Q3. How material is this issue?		
Northpower	Issue 7, Q3. How material is this issue?		
Nova Energy	Issue 7, Q3. How	For Trader's purposes, invoicing, reconciling energy, tracking	Noted

Submitter	Question	Submission	Authority response
	material is this issue?	sales and churn, this has very little relevance. This is more related to the statistics and pattern tracking of switching ICPs and Traders in the country. While this information is useful for government agencies it doesn't hold much value for Traders or customers. There are other more impactful issues in the code that could be prioritised above these changes.	
Orion Energy	Issue 7, Q3. How material is this issue?		
Powerco	Issue 7, Q3. How material is this issue?		
Simply Energy	Issue 7, Q3. How material is this issue?		
Tenco	Issue 7, Q3. How material is this issue?		
Trustpower	Issue 7, Q3. How material is this issue?	Low	Noted
Unison Networks	Issue 7, Q3. How material is this issue?		
Vector	Issue 7, Q3. How material is this issue?		
Wellington Electricity	Issue 7, Q3. How material is this issue?		
Issue 7: Interpreting trader ICP switching as customer or embedded generator switching may be misleading			

Submitter	Question	Submission	Authority response
Q4. Is this issue getting worse?			
Contact Energy	Issue 7, Q4. Is this issue getting worse?	Not necessarily getting worse, however considered low in the wider customer movement and switching view.	Noted
Electric Kiwi	Issue 7, Q4. Is this issue getting worse?	We agree that this is an issue, and it would be beneficial to the industry to understand ICP transfers versus customer transfers. We would prefer that any changes required to produce this are simple and easy to integrate into participants' systems. One solution could be the use of a new switch type.	Noted. Refer to response above
Flick Energy	Issue 7, Q4. Is this issue getting worse?		
Genesis Energy	Issue 7, Q4. Is this issue getting worse?	We believe it is becoming more prevalent as focus on industry performance increases.	Noted
IntelliHub	Issue 7, Q4. Is this issue getting worse?		
Mercury	Issue 7, Q4. Is this issue getting worse?		
Meridian and Powershop	Issue 7, Q4. Is this issue getting worse?	Unclear.	Noted
Metrix	Issue 7, Q4. Is this issue getting worse?		
Northpower	Issue 7, Q4. Is this issue		

Submitter	Question	Submission	Authority response
	getting worse?		
Nova Energy	Issue 7, Q4. Is this issue getting worse?	No	Noted
Orion Energy	Issue 7, Q4. Is this issue getting worse?		
Powerco	Issue 7, Q4. Is this issue getting worse?		
Simply Energy	Issue 7, Q4. Is this issue getting worse?		
Tenco	Issue 7, Q4. Is this issue getting worse?		
Trustpower	Issue 7, Q4. Is this issue getting worse?	No	Noted
Unison Networks	Issue 7, Q4. Is this issue getting worse?		
Vector	Issue 7, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 7, Q4. Is this issue getting worse?		
Issue 7: Interpreting trader ICP switching as customer or embedded generator switching may be misleading Q5. Why do you think this issue is occurring?			

Submitter	Question	Submission	Authority response
Contact Energy	Issue 7, Q5. Why do you think this issue is occurring?	Contact can see what the EA is attempting to achieve, however recommend that if this is considered a critical input into their industry monitoring, we propose the requirements are met by reports to the EA, as opposed to introducing new registry interfaces or functionality. This would be preferable and a simpler solution while avoiding the potential for over engineering and creating unnecessary system change costs across all Traders.	Noted. This is included in Issue 6
Electric Kiwi	Issue 7, Q5. Why do you think this issue is occurring?	We agree that this is an issue, and it would be beneficial to the industry to understand ICP transfers versus customer transfers. We would prefer that any changes required to produce this are simple and easy to integrate into participants' systems. One solution could be the use of a new switch type.	Noted. Refer to response above
Flick Energy	Issue 7, Q5. Why do you think this issue is occurring?		
Genesis Energy	Issue 7, Q5. Why do you think this issue is occurring?	This has been an issue since switching began as a result of the process design.	Noted
IntelliHub	Issue 7, Q5. Why do you think this issue is occurring?		
Mercury	Issue 7, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 7, Q5. Why do you think this issue is occurring?	Meridian / Powershop recognises there is a need for the Authority to report accurate information on switches. However, we believe the issues identified are separate to matters of how the switch process operates.	Noted
Metrix	Issue 7, Q5. Why do you think this issue is occurring?		
Northpower	Issue 7, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 7, Q5. Why do you think this issue is occurring?	As the current Code and Registry isn't designed to capture this information.	Noted
Orion Energy	Issue 7, Q5. Why do you think this issue is occurring?		
Powerco	Issue 7, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 7, Q5. Why do you think this issue is occurring?		
Tenco	Issue 7, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Trustpower	Issue 7, Q5. Why do you think this issue is occurring?	No issue; as a trader we can report on this internally.	Noted
Unison Networks	Issue 7, Q5. Why do you think this issue is occurring?		
Vector	Issue 7, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 7, Q5. Why do you think this issue is occurring?		
Issue 8: There is no mechanism to identify the sale and transfer of customer or embedded generator accounts between traders Q3. How material is this issue?			
Contact Energy	Issue 8, Q3. How material is this issue?	Low impact	Noted
Electric Kiwi	Issue 8, Q3. How material is this issue?	We agree that this is an issue, and it would be ideal to address it. As mentioned in Issue #7 above, we would prefer that any changes required to fix this are simple and easy to integrate into participants' systems. One solution could be the use of a new switch type.	Noted. This is included in Issue 7

Submitter	Question	Submission	Authority response
Flick Energy	Issue 8, Q3. How material is this issue?	Currently this is not an issue with Flick.	Noted
Genesis Energy	Issue 8, Q3. How material is this issue?	<p><i>This relates to issue 10</i></p> <p>Immaterial. This is an issue with reporting for the Authority that has little impact on industry participants; as such we do not consider changes to everyday processes and file formats would be justified to accommodate it.</p> <p>It appears that reporting accuracy and awareness is the underlying concern for the Authority. To address this, advice of ICPs involved in a sale and the effective date (in a defined format to help reporting) could be mandated to be supplied outside of the ICP switch process as and when a sale or transfer occurs.</p>	Noted. This is included in Issue 7
IntelliHub	Issue 8, Q3. How material is this issue?		
Mercury	Issue 8, Q3. How material is this issue?		
Meridian and Powershop	Issue 8, Q3. How material is this issue?	Not significant in our view.	Noted
Metrix	Issue 8, Q3. How material is this issue?		
Northpower	Issue 8, Q3. How material is this issue?		
Nova Energy	Issue 8, Q3. How material is this issue?	Identifying the transfer or sale of customers and embedded generator accounts between Traders is moderately material. As	Noted

Submitter	Question	Submission	Authority response
		this is not currently identifiable on the Registry there is no way of distinguishing changes requested by the customer. Also, if there are issues with metering etc. or of time slice switching, it is not immediately identifiable who to contact and who is able to resolve the issue. There is the issue of which switch type to use as neither MI nor TR are accurate. More often MI is used to allow for a fixed date and less impact to customers billing cycles. This also impacts the tracking of customer movements and whether those were customer choices or not as raised in issue 7	
Orion Energy	Issue 8, Q3. How material is this issue?		
Powerco	Issue 8, Q3. How material is this issue?		
Simply Energy	Issue 8, Q3. How material is this issue?		
Tenco	Issue 8, Q3. How material is this issue?		
Trustpower	Issue 8, Q3. How material is this issue?	High	Noted
Unison Networks	Issue 8, Q3. How material is this issue?		
Vector	Issue 8, Q3. How material is this issue?		
Wellington	Issue 8, Q3. How		

Submitter	Question	Submission	Authority response
Electricity	material is this issue?		
Issue 8: There is no mechanism to identify the sale and transfer of customer or embedded generator accounts between traders Q4. Is this issue getting worse?			
Contact Energy	Issue 8, Q4. Is this issue getting worse?	Not necessarily getting worse, however considered low in the wider customer movement and switching view.	Noted
Electric Kiwi	Issue 8, Q4. Is this issue getting worse?	We agree that this is an issue, and it would be ideal to address it. As mentioned in Issue #7 above, we would prefer that any changes required to fix this are simple and easy to integrate into participants' systems. One solution could be the use of a new switch type.	Noted. Refer to response above
Flick Energy	Issue 8, Q4. Is this issue getting worse?		
Genesis Energy	Issue 8, Q4. Is this issue getting worse?	<i>This relates to issue 10</i> No comment.	Noted
IntelliHub	Issue 8, Q4. Is this issue getting worse?		
Mercury	Issue 8, Q4. Is this issue getting worse?		
Meridian and Powershop	Issue 8, Q4. Is this issue getting worse?	We consider more accurate information may be required but we do not believe the issue is getting worse.	Noted

Submitter	Question	Submission	Authority response
Metrix	Issue 8, Q4. Is this issue getting worse?		
Northpower	Issue 8, Q4. Is this issue getting worse?		
Nova Energy	Issue 8, Q4. Is this issue getting worse?	There have been a number of customers sold or transferred between Traders within the last 24 months. This is likely to remain a fixture of the industry.	Noted
Orion Energy	Issue 8, Q4. Is this issue getting worse?		
Powerco	Issue 8, Q4. Is this issue getting worse?		
Simply Energy	Issue 8, Q4. Is this issue getting worse?		
Tenco	Issue 8, Q4. Is this issue getting worse?		
Trustpower	Issue 8, Q4. Is this issue getting worse?	Yes	Noted
Wellington Electricity	Issue 8, Q4. Is this issue getting worse?		
Unison Networks	Issue 8, Q4. Is this issue getting worse?		
Vector	Issue 8, Q4. Is this issue		

Submitter	Question	Submission	Authority response
	getting worse?		
Issue 8: There is no mechanism to identify the sale and transfer of customer or embedded generator accounts between traders			
Q5. Why do you think this issue is			
Contact Energy	Issue 8, Q5. Why do you think this issue is occurring?	As per response to issue 7, if there is genuine purpose for the EA to receive such information to support market monitoring then this should be catered for via reporting, not registry functionality. The EA will also need to consider and identify clearly what the definitions are for each of the customer/ICP movements they are wishing to track.	Noted
Electric Kiwi	Issue 8, Q5. Why do you think this issue is occurring?	We agree that this is an issue, and it would be ideal to address it. As mentioned in Issue #7 above, we would prefer that any changes required to fix this are simple and easy to integrate into participants' systems. One solution could be the use of a new switch type.	Noted. Refer to response above
Metrix	Issue 8, Q5. Why do you think this issue is occurring?		
Flick Energy	Issue 8, Q5. Why do you think this issue is occurring?		
Genesis Energy	Issue 8, Q5. Why do you think this issue is	<i>This relates to issue 10</i> No comment.	Noted

Submitter	Question	Submission	Authority response
	occurring?		
IntelliHub	Issue 8, Q5. Why do you think this issue is occurring?		
Mercury	Issue 8, Q5. Why do you think this issue is occurring?		
Meridian and Powershop	Issue 8, Q5. Why do you think this issue is occurring?	Unsure.	Noted
Northpower	Issue 8, Q5. Why do you think this issue is occurring?		
Unison Networks	Issue 8, Q5. Why do you think this issue is occurring?		
Vector	Issue 8, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 8, Q5. Why do you think this issue is occurring?	NA	
Orion Energy	Issue 8, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
Powerco	Issue 8, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 8, Q5. Why do you think this issue is occurring?		
Tenco	Issue 8, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 8, Q5. Why do you think this issue is occurring?	More financial risk, which could be undermining the business model for smaller retailers.	Noted
Wellington Electricity	Issue 8, Q5. Why do you think this issue is occurring?		
Issue 9: It is unclear whether an acknowledgment of a switch request notification is required			
Q3. How material is this issue?			
Contact Energy	Issue 9, Q3. How material is this issue?	Low impact	Noted
Electric Kiwi	Issue 9, Q3. How material is this issue?	We don't consider this to be a major switching issue, however, we believe the AN files are quite beneficial to the process. They indicate that the switch is being processed and provides background in to the status of the ICP (through the AN code). To	Noted. This is included in Issue 8

Submitter	Question	Submission	Authority response
		<p>simplify the process, the ideal solution is to always require an AN within the same timeframe despite which type of NT has been sent.</p> <p>We find sending ANs to be useful as some other traders send NTTRs today with yesterday's date requested, or an NT 10 days in advance, and we always respond with an AN with the proposed effect date equal to today. Without the AN for NTTRs, we would be unable to propose a new date. We do agree that there might be a need to send multiple AN codes in the response, however, an alternative is to have some new AN codes which could encompass a variety of current codes (i.e. Occupied Disconnected, instead of OC, PD - we could use 'OD').</p>	
Flick Energy	Issue 9, Q3. How material is this issue?	It seems this is an unnecessary step which also hinders the automation of the back office process. There should be other means established through registry to notify gaining retailers if there is a reason which could delay the switch. Also there is inconsistency in the AN requirement and depends on the type of switch being initiated.	Noted. This is discussed in Issue 8
Genesis Energy	Issue 9, Q3. How material is this issue?	<p><i>This relates to issues 1, 4 and 10</i></p> <p>We hear that anecdotally many traders send switch acknowledgment (AN) files for every switch as it is easier than including logic in their systems to only send the AN file when they must.</p> <p>Over time the original purpose of an AN file - that is, to identify the current trader and supply information not held in the registry - has been superseded by developments in the registry to the point there is doubt it provides any value in the ICP switch process anymore.</p>	Noted. This is discussed in Issue 8

Submitter	Question	Submission	Authority response
		In addition to the solution recommend above for issue #1, we consider the AN file should be removed from the switch process to simply it.	
IntelliHub	Issue 9, Q3. How material is this issue?		
Mercury	Issue 9, Q3. How material is this issue?	Not Material	Noted
Meridian and Powershop	Issue 9, Q3. How material is this issue?	We do not believe the specific issue identified to be particularly significant.	Noted
Metrix	Issue 9, Q3. How material is this issue?		
Northpower	Issue 9, Q3. How material is this issue?		
Nova Energy	Issue 9, Q3. How material is this issue?	<p>As most Traders have developed their systems in order to ensure their 'AN' response codes contain accurate information this is material to Traders. The 'AN' response codes also signify information that if used by the gaining Trader, could identify that an incorrect ICP is being gained, or that a switch is likely to be withdrawn. More relevant is reviewing the discrepancies in switching processes across the different switch types to create more uniformity in the processes.</p> <p>The AN Response will also let the Gaining Trader know if there has been a change to the Proposed Switch Date.</p>	Noted. This is discussed in Issue 8
Orion Energy	Issue 9, Q3. How		

Submitter	Question	Submission	Authority response
	material is this issue?		
Powerco	Issue 9, Q3. How material is this issue?		
Simply Energy	Issue 9, Q3. How material is this issue?		
Tenco	Issue 9, Q3. How material is this issue?		
Trustpower	Issue 9, Q3. How material is this issue?	Low	Noted
Unison Networks	Issue 9, Q3. How material is this issue?		
Vector	Issue 9, Q3. How material is this issue?		
Wellington Electricity	Issue 9, Q3. How material is this issue?		
Issue 9: It is unclear whether an acknowledgment of a switch request notification is required Q4. Is this issue getting worse?			
Contact Energy	Issue 9, Q4. Is this issue getting worse?	Not necessarily getting worse, however high in volume	Noted
Electric Kiwi	Issue 9, Q4. Is this issue getting worse?	We don't consider this to be a major switching issue, however, we believe the AN files are quite beneficial to the process. They indicate that the switch is being processed and provides	Noted. Refer to response above

Submitter	Question	Submission	Authority response
		<p>background in to the status of the ICP (through the AN code). To simplify the process, the ideal solution is to always require an AN within the same timeframe despite which type of NT has been sent.</p> <p>We find sending ANs to be useful as some other traders send NTTRs today with yesterday's date requested, or an NT 10 days in advance, and we always respond with an AN with the proposed effect date equal to today. Without the AN for NTTRs, we would be unable to propose a new date. We do agree that there might be a need to send multiple AN codes in the response, however, an alternative is to have some new AN codes which could encompass a variety of current codes (i.e. Occupied Disconnected, instead of OC, PD - we could use 'OD').</p>	
Flick Energy	Issue 9, Q4. Is this issue getting worse?	Yes, this causes confusion and errors in the switching process.	Noted
Genesis Energy	Issue 9, Q4. Is this issue getting worse?	<p><i>This relates to issues 1, 4 and 10</i></p> <p>It is static.</p>	Noted
IntelliHub	Issue 9, Q4. Is this issue getting worse?		
Mercury	Issue 9, Q4. Is this issue getting worse?	<p>Mercury does not believe it is as all retailers have access for reporting on these notifications. It should be assumed that the retailer is aware of the request.</p> <p>A breach in this area shows that the retailer needs better process in place to ensure they respond on time.</p>	Noted
Meridian and Powershop	Issue 9, Q4. Is this issue getting worse?	No – we believe this is more of an opportunity than an issue as such.	Noted

Submitter	Question	Submission	Authority response
Metrix	Issue 9, Q4. Is this issue getting worse?		
Northpower	Issue 9, Q4. Is this issue getting worse?		
Nova Energy	Issue 9, Q4. Is this issue getting worse?	NA	
Orion Energy	Issue 9, Q4. Is this issue getting worse?		
Powerco	Issue 9, Q4. Is this issue getting worse?		
Simply Energy	Issue 9, Q4. Is this issue getting worse?		
Tenco	Issue 9, Q4. Is this issue getting worse?		
Trustpower	Issue 9, Q4. Is this issue getting worse?	No	Noted
Unison Networks	Issue 9, Q4. Is this issue getting worse?		
Vector	Issue 9, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 9, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Issue 9: It is unclear whether an acknowledgment of a switch request notification is required			
Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 9, Q5. Why do you think this issue is occurring?	<p>Contact conceptually agrees that the primary or underlying purpose of switch acknowledgement file (AN file) is somewhat outdated and unnecessary. Contact can however, potentially still see a need for an intermediate file (especially if the MEP is introduced to the switching process), however it is noted this doesn't necessarily have to be the AN file. If the MEP is introduced into the switching process it might be cleaner and less costly to repurpose the AN file to enable problematic or exception scenarios to be identified where the MEP cannot provide a AMI reading (estimate or actual). This would then enable an alternative switching flow or process to continue in such occurrences.</p> <p>As illustrated under issue 4, one further observation is that the industry needs to consider the possibility of contract date clashes or overlaps which the AN file does currently assist with.</p> <p>Contact also considers that the statement related to when a losing trader must provide the AN file In the Issues paper does not align with the current Code requirement.</p> <p>The Code currently states (Schedule 11.3, 3 &10 – Losing trader response to standard switch or switch move request) that the Losing Trader, no later than 3 business days after the receiving the NT must either acknowledge the switch (AN file) or provide the final information (Complete the switch - CS file). There is no current requirement to provide the AN file in all cases if the CS file is provided within the required timeframe.</p>	<p>Noted. This is discussed in Issue 8</p> <p>Noted. The switching process does not consider commercial contracts. This is an issue between customers and traders</p>
Electric Kiwi	Issue 9, Q5. Why do you	We don't consider this to be a major switching issue, however,	Noted. Refer to response above

Submitter	Question	Submission	Authority response
	think this issue is occurring?	<p>we believe the AN files are quite beneficial to the process. They indicate that the switch is being processed and provides background in to the status of the ICP (through the AN code). To simplify the process, the ideal solution is to always require an AN within the same timeframe despite which type of NT has been sent.</p> <p>We find sending ANs to be useful as some other traders send NTTRs today with yesterday's date requested, or an NT 10 days in advance, and we always respond with an AN with the proposed effect date equal to today. Without the AN for NTTRs, we would be unable to propose a new date. We do agree that there might be a need to send multiple AN codes in the response, however, an alternative is to have some new AN codes which could encompass a variety of current codes (i.e. Occupied Disconnected, instead of OC, PD - we could use 'OD').</p>	
Flick Energy	Issue 9, Q5. Why do you think this issue is occurring?	The AN requirement is inconsistent and is not mandatory for all switch types.	Noted
Genesis Energy	Issue 9, Q5. Why do you think this issue is occurring?	<p><i>This relates to issues 1, 4 and 10</i></p> <p>See response to Q2.</p>	Noted
IntelliHub	Issue 9, Q5. Why do you think this issue is occurring?		
Mercury	Issue 9, Q5. Why do you think this issue is occurring?	<p>Not sure if acknowledgment of a switch request notification is required</p> <p>This adds an inefficiency as Mercury believes this is</p>	Noted. This is discussed in Issue 8

Submitter	Question	Submission	Authority response
		<p>unnecessary</p> <p>In addition, the AKN notice file does not provide any value</p> <p>We would like this process to be reviewed.</p> <p>This is currently on breach reports for audits etc but what is the material effect of it not being required.</p>	Noted. The acknowledgement can be ignored if it is not required.
Meridian and Powershop	Issue 9, Q5. Why do you think this issue is occurring?	There is an opportunity to redefine when and how the AN notification is used and believe this should be explored further.	Refer to STG
Metrix	Issue 9, Q5. Why do you think this issue is occurring?		
Northpower	Issue 9, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 9, Q5. Why do you think this issue is occurring?	NA	
Orion Energy	Issue 9, Q5. Why do you think this issue is occurring?		
Powerco	Issue 9, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 9, Q5. Why do you		

Submitter	Question	Submission	Authority response
	think this issue is occurring?		
Tenco	Issue 9, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 9, Q5. Why do you think this issue is occurring?	Different rules for transfers and move-ins, but is straightforward in the rules.	Noted
Unison Networks	Issue 9, Q5. Why do you think this issue is occurring?		
Vector	Issue 9, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 9, Q5. Why do you think this issue is occurring?		
Issue 10: Different timeframes for different types of ICP switches add complexity to the ICP switching process Q3. How material is this issue?			
Contact Energy	Issue 10, Q3. How material is this issue?	Medium to high impact	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 10, Q3. How material is this issue?	We agree that this adds complexity and confusion to the switching process. The ideal solution is that timeframes are standardized for the different switch types.	Noted
Flick Energy	Issue 10, Q3. How material is this issue?	To increase operational efficiency and to avoid code breaches it is essential to align timeframes for all the switch types. Currently the different timeframes set for each switch type adds complexity to back office operations leading to breaches.	Noted
Genesis Energy	Issue 10, Q3. How material is this issue?	<i>This relates to issues 1, 3, 6, 8 and 9</i> Genesis agrees this is an issue and consider it could be resolved by removing the connection between transfer, move-in or half hour codes and subsequent switch timeframes: If the gaining trader can indicate whether they wish to complete the switch (say for non-mass market AMI ICPs), and if the gaining trader can set the switch date, this will mean there is a single timeframe for all switches to occur e.g. all switches to be completed within the latter of 2 business days of the event date or when the switch notification is received by the registry. We consider this would be a customer centric move, as having the timeframe based on the switch event date means it is tied to a date the customer is aware of, rather than a date that is related to an internal file exchange protocol. The rider of the latter of event date or notification file date is to account for backdated switches such as historical move-ins.	Noted. This is included in Issue 1

Submitter	Question	Submission	Authority response
		If this change and others we have recommended above were implemented, we could sign up a customer today and agree to start billing them from 15th of the following month as that aligns with their pay cycle. We would submit a first notification file (NT) with the 15th as the switch date and by the 17th we would have the switch complete (CS) file with metering configuration from the registry combined with a read for the 15th.	
IntelliHub	Issue 10, Q3. How material is this issue?		
Mercury	Issue 10, Q3. How material is this issue?	Material.	Noted
Meridian and Powershop	Issue 10, Q3. How material is this issue?	Very.	Noted
Metrix	Issue 10, Q3. How material is this issue?		
Northpower	Issue 10, Q3. How material is this issue?		
Nova Energy	Issue 10, Q3. How material is this issue?	The differing timeframes for similar switching processes causes confusion and restricts automation of processes. It can result in incorrect understanding of obligations and timeframes which can mean incorrect expectations are set with customers. It limits systems abilities to generate the correct files at the correct points as there are contradictory rules for switching ICPs.	Noted. This is included in Issue 9
Orion Energy	Issue 10, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Powerco	Issue 10, Q3. How material is this issue?		
Simply Energy	Issue 10, Q3. How material is this issue?		
Tenco	Issue 10, Q3. How material is this issue?		
Trustpower	Issue 10, Q3. How material is this issue?	Low to Medium	Noted
Unison Networks	Issue 10, Q3. How material is this issue?		
Vector	Issue 10, Q3. How material is this issue?		
Wellington Electricity	Issue 10, Q3. How material is this issue?		
Issue 10: Different timeframes for different types of ICP switches add complexity to the ICP switching process Q4. Is this issue getting worse?			
Contact Energy	Issue 10, Q4. Is this issue getting worse?	Not necessarily getting worse, however high in volume	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 10, Q4. Is this issue getting worse?	We agree that this adds complexity and confusion to the switching process. The ideal solution is that timeframes are standardized for the different switch types.	Noted
Flick Energy	Issue 10, Q4. Is this issue getting worse?	Yes, this is leading to more breaches as traders are confused on which timeframes are set for each switch types	Noted
Genesis Energy	Issue 10, Q4. Is this issue getting worse?	<i>This relates to issues 1, 3, 6, 8 and 9</i> It is static.	Noted
IntelliHub	Issue 10, Q4. Is this issue getting worse?		
Mercury	Issue 10, Q4. Is this issue getting worse?	No view	
Meridian and Powershop	Issue 10, Q4. Is this issue getting worse?	Yes.	Noted
Metrix	Issue 10, Q4. Is this issue getting worse?		
Nova Energy	Issue 10, Q4. Is this issue getting worse?	As the industry diversifies and welcomes new Traders, this causes avoidable breaches and more inefficient practices.	Noted
Northpower	Issue 10, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Orion Energy	Issue 10, Q4. Is this issue getting worse?		
Powerco	Issue 10, Q4. Is this issue getting worse?		
Simply Energy	Issue 10, Q4. Is this issue getting worse?		
Tenco	Issue 10, Q4. Is this issue getting worse?		
Trustpower	Issue 10, Q4. Is this issue getting worse?	No	Noted
Unison Networks	Issue 10, Q4. Is this issue getting worse?		
Vector	Issue 10, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 10, Q4. Is this issue getting worse?		
Issue 10: Different timeframes for different types of ICP switches add complexity to the ICP switching process Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 10, Q5. Why do you think this issue is occurring?	Contact believes that the switching timeframes need to be simplified and aligned to remove complexity and variation within both the Code and Traders systems. We cannot see any reason as to why the industry would require different timeframes and	Noted. This is included in Issue 9

Submitter	Question	Submission	Authority response
		thresholds for each switch type.	
Electric Kiwi	Issue 10, Q5. Why do you think this issue is occurring?	We agree that this adds complexity and confusion to the switching process. The ideal solution is that timeframes are standardized for the different switch types.	Noted. This is included in Issue 9
Flick Energy	Issue 10, Q5. Why do you think this issue is occurring?	This issue is occurring due to the non-alignment of timeframes for different switch types in the code.	Noted. This is included in Issue 9
Genesis Energy	Issue 10, Q5. Why do you think this issue is occurring?	<i>This relates to issues 1, 3, 6, 8 and 9</i> See response to Q2.	Noted
IntelliHub	Issue 10, Q5. Why do you think this issue is occurring?		
Mercury	Issue 10, Q5. Why do you think this issue is occurring?	Mercury would suggest having a 3 day window between switch events. I.e: NT to AN, AN to CS, NW to AW. Another suggestion would be to allow each retailer an extension by applying for another 3 day window on the same code, follow by an 'X'. (NTX, NWX). This would show that the retailer has received the request, and needs more time.	Noted. However this has not been included as one of the options in Issue 9
Meridian and Powershop	Issue 10, Q5. Why do you think this issue is	The current structure has too many variables which makes it difficult for participants to follow and report on. There is no	Noted. This is included in Issue 9

Submitter	Question	Submission	Authority response
	occurring?	"breach" report in place to cover all of the varying time frames.	
Metrix	Issue 10, Q5. Why do you think this issue is occurring?		
Northpower	Issue 10, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 10, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 10, Q5. Why do you think this issue is occurring?		
Powerco	Issue 10, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 10, Q5. Why do you think this issue is occurring?		
Tenco	Issue 10, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 10, Q5. Why do you think this issue is	Different rules and timeframes could be aligned.	Noted. This is included in Issue 9

Submitter	Question	Submission	Authority response
	occurring?		
Unison Networks	Issue 10, Q5. Why do you think this issue is occurring?		
Vector	Issue 10, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 10, Q5. Why do you think this issue is occurring?		
Issue 11: Switch withdrawals can be delayed because of delayed information from third parties			
Q3. How material is this issue?			
Contact Energy	Issue 11, Q3. How material is this issue?	Medium impact	Noted
Electric Kiwi	Issue 11, Q3. How material is this issue?	<p>There are many reasons a switch withdrawal may need to be done after 2 months' time. An example we come across occasionally is a customer providing incorrect address details which results in us switching over a wrong property. Many times, we have the property for months before we find out that it's incorrect, and usually we only find out due to metering issues which require a site visit.</p> <p>As we have no customer at the wrong property, we attempt to withdrawal the ICP back to the previous trader, but they reject the NW due to it being longer than two months since the switch completed. In at least one of these cases, we were unable to</p>	Noted. This is partly included in Issue 10

Submitter	Question	Submission	Authority response
		read or disconnect the property for over 6 months because there was no known customer. A switch withdrawal should be allowed up to the last revision period. As long as it can still be reconciled on and both parties agree, we do not see any issue with a withdrawal after two months.	
Flick Energy	Issue 11, Q3. How material is this issue?	It is essential for the retailer to know the reason for the notice of withdrawal before making a decision on whether to accept or reject the withdrawal. The current method of email correspondence delays the switch withdrawal process. Flick proposes for a text field to be introduced in registry which could be filled by the retailers detailing the reasons for raising or rejecting the withdrawal.	Noted. This is included in Issue 10
Genesis Energy	Issue 11, Q3. How material is this issue?	<p>Genesis does not consider this issue is material, and there is no justification for regulatory intervention at this time.</p> <p>In our view, if information is required from a third party for a trader to complete their obligations, this is not a failing of the ICP switch process, but rather an issue for that participant's operational relationship with the third party and/or its own internal processes.</p> <p>Altering the ICP switch process to 'address' delays is likely to have the effect of disguising the underlying issue – as happens currently with traders withdrawing switches where they have delays in creating the CS file and then re-processing the switch to avoid the CS file timeframe breaches.</p>	Noted
IntelliHub	Issue 11, Q3. How material is this issue?		
Mercury	Issue 11, Q3. How	This is a material issue as it clogs up emails (as this is the	Noted

Submitter	Question	Submission	Authority response
	material is this issue?	mechanism for receiving notifications) This is very common with TOU sites. Mercury would suggest either giving NWs a 6 day breach period, or implementing the 'extension' system Mercury suggested above.	
Meridian and Powershop	Issue 11, Q3. How material is this issue?	Unclear.	Noted
Metrix	Issue 11, Q3. How material is this issue?	As the timeframe is taken from the switch effective date, not when the switch was completed on the Registry, backdated switch requests can often fail as non-compliant. If both Traders agree, there should not be a restriction on the withdrawal timeframes, but if there is going to be a compliance requirement on timeframes then it should apply from when the switch was completed on the Registry, not the switch effective date.	Noted. This is included in Issue 10
Northpower	Issue 11, Q3. How material is this issue?		
Nova Energy	Issue 11, Q3. How material is this issue?		
Orion Energy	Issue 11, Q3. How material is this issue?		
Powerco	Issue 11, Q3. How material is this issue?		
Simply Energy	Issue 11, Q3. How material is this issue?		
Tenco	Issue 11, Q3. How		

Submitter	Question	Submission	Authority response
	material is this issue?		
Trustpower	Issue 11, Q3. How material is this issue?	Low	Noted
Unison Networks	Issue 11, Q3. How material is this issue?		
Vector	Issue 11, Q3. How material is this issue?		
Wellington Electricity	Issue 11, Q3. How material is this issue?		
Issue 11: Switch withdrawals can be delayed because of delayed information from third parties Q4. Is this issue getting worse?			
Contact Energy	Issue 11, Q4. Is this issue getting worse?	Not necessarily getting worse, however high in volume	Noted
Electric Kiwi	Issue 11, Q4. Is this issue getting worse?	<p>There are many reasons a switch withdrawal may need to be done after 2 months' time. An example we come across occasionally is a customer providing incorrect address details which results in us switching over a wrong property. Many times, we have the property for months before we find out that it's incorrect, and usually we only find out due to metering issues which require a site visit.</p> <p>As we have no customer at the wrong property, we attempt to withdrawal the ICP back to the previous trader, but they reject the NW due to it being longer than two months since the switch completed. In at least one of these cases, we were unable to</p>	Noted. Refer to response above

Submitter	Question	Submission	Authority response
		read or disconnect the property for over 6 months because there was no known customer. A switch withdrawal should be allowed up to the last revision period. As long as it can still be reconciled on and both parties agree, we do not see any issue with a withdrawal after two months.	
Flick Energy	Issue 11, Q4. Is this issue getting worse?	Yes, with increase in switch activities this issue is getting worse.	Noted
Genesis Energy	Issue 11, Q4. Is this issue getting worse?	We note that soon after updates were made to Part 10 of the Code, several switches were delayed due to incorrect metering data being populated in the registry. These delays have dropped away as the data has been corrected and in absence of evidence to the contrary we believe the 'noise' around this issue is simply a hangover from that time.	Noted
IntelliHub	Issue 11, Q4. Is this issue getting worse?		
Mercury	Issue 11, Q4. Is this issue getting worse?	Yes	Noted
Meridian and Powershop	Issue 11, Q4. Is this issue getting worse?	Unsure.	Noted
Metrix	Issue 11, Q4. Is this issue getting worse?	NA	
Northpower	Issue 11, Q4. Is this issue getting worse?		
Nova Energy	Issue 11, Q4. Is this		

Submitter	Question	Submission	Authority response
	issue getting worse?		
Orion Energy	Issue 11, Q4. Is this issue getting worse?		
Powerco	Issue 11, Q4. Is this issue getting worse?		
Simply Energy	Issue 11, Q4. Is this issue getting worse?		
Tenco	Issue 11, Q4. Is this issue getting worse?		
Trustpower	Issue 11, Q4. Is this issue getting worse?	No	Noted
Unison Networks	Issue 11, Q4. Is this issue getting worse?		
Vector	Issue 11, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 11, Q4. Is this issue getting worse?		
Issue 11: Switch withdrawals can be delayed because of delayed information from third parties Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 11, Q5. Why do you think this issue is occurring?	Contact considers switch withdrawals (outside of retention based activity) should be a last resort approach, however the Code needs to be flexible enough to support this approach, it would be	

Submitter	Question	Submission	Authority response
		<p>more efficient to let a switch take slightly longer and still proceed after problem resolution as opposed to withdrawing the switch and starting again.</p> <p>Contact notes that the paper advises that approximately 17% of switches are subsequently withdrawn. Does this statistic only relate to the scenarios listed under issue 11 of the paper or is retention activity included in these statistics?</p> <p>Contact would also like to note that the statement (4.71) in the issues paper doesn't align with the current Code requirement. The issues paper states that the Code requires that, if a switch is to be withdrawn, then it must be withdrawn <u>no more than two months after the switch has been completed</u>. The Code (Schedule 11.3 - 17 - Withdrawal of switch requests) states that a losing trader or gaining trader may request that a switch request be withdrawn at any time until the expiry of 2 months after the <u>event date</u>.</p> <p>Contact considers the current Code requirement to be flawed as it's possible that a switch is completed and backdated with a switch event date 2 or more months from the date the switch is physically completed in the registry. This then technically means the switch is unable to be withdrawn at all, irrespective of whether errors are identified. Contact recommends the Code is changed to align with the statement in the issues paper (switch completion date, not switch event date) which would also align with what Traders are currently allowing.</p>	<p>The statistic is for all switch withdrawals</p> <p>This has been corrected</p> <p>Noted. This is included in Issue 10 Option 5</p>
Electric Kiwi	Issue 11, Q5. Why do you think this issue is occurring?	There are many reasons a switch withdrawal may need to be done after 2 months' time. An example we come across occasionally is a customer providing incorrect address details which results in us switching over a wrong property. Many times,	Noted. Refer to response above

Submitter	Question	Submission	Authority response
		<p>we have the property for months before we find out that it's incorrect, and usually we only find out due to metering issues which require a site visit.</p> <p>As we have no customer at the wrong property, we attempt to withdrawal the ICP back to the previous trader, but they reject the NW due to it being longer than two months since the switch completed. In at least one of these cases, we were unable to read or disconnect the property for over 6 months because there was no known customer. A switch withdrawal should be allowed up to the last revision period. As long as it can still be reconciled on and both parties agree, we do not see any issue with a withdrawal after two months.</p>	
Flick Energy	Issue 11, Q5. Why do you think this issue is occurring?	The unavailability of free text field in registry limits the efficiency of this process.	Noted. This is included in Issue 10 Option 3
Genesis Energy	Issue 11, Q5. Why do you think this issue is occurring?	It is a direct result of participants' own internal processes and third-party relationships.	Noted
IntelliHub	Issue 11, Q5. Why do you think this issue is occurring?		
Mercury	Issue 11, Q5. Why do you think this issue is occurring?	<p>More retailers in the market and not enough codes relevant in the registry.</p> <p>Mercury suggests more codes would reduce the need for email traffic and one again provide a single source of information (the registry)</p>	Noted. This is partly included in Issue 10

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 11, Q5. Why do you think this issue is occurring?	As traders we are asking for more information in order make decisions around incorrect properties, metering issues etc and these take time due to access, and aligning third parties to complete work. It is not uncommon for a withdrawal to be initiated outside of the 2 month period contemplated in the Code.	Noted. This is included in Issue 10 Option 5
Metrix	Issue 11, Q5. Why do you think this issue is occurring?	Multiple factors are causing noncompliance; <ul style="list-style-type: none"> • Two months being taken from switch effective date • Historic mixed metering being discovered • Customers unaware that their ICP has switched until after the 2 month window has ended. (NWUA or NWWP) 	Noted. This is included in Issue 10
Northpower	Issue 11, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 11, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 11, Q5. Why do you think this issue is occurring?		
Powerco	Issue 11, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 11, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
Tenco	Issue 11, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 11, Q5. Why do you think this issue is occurring?	Data quality	Noted
Unison Networks	Issue 11, Q5. Why do you think this issue is occurring?		
Vector	Issue 11, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 11, Q5. Why do you think this issue is occurring?		
Issue 12: Different timeframes for applying a meter reading to a NHH ICP switch add complexity to the ICP switching process Q3. How material is this issue?			
Contact Energy	Issue 12, Q3. How material is this issue?	Low impact	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 12, Q3. How material is this issue?	We do not currently reconcile NHH, but we support any move to ensure consistency between meter reads and reduce UFE or incorrect ICP days in reconciliation.	Noted
Flick Energy	Issue 12, Q3. How material is this issue?	The non-alignment of the meter reading date applied by the gaining and losing retailer causes inaccuracy in reporting the ICP days to the reconciliation manager. There is always a one day discrepancy between the two.	Noted. This is included in Issue 11
Genesis Energy	Issue 12, Q3. How material is this issue?	<i>This relates to issue 6</i> It appears this issue results from a misunderstanding of the use of switch reads rather than any definition itself. ⁵ A real, associated issue is that with the NHH read being deemed to be at the 24:00/00:00 boundary, a gaining HHR retailer will notice a discrepancy between the 24:00 NHH read and the subsequent half hour consumptions as the NHH read is to be an estimate for 24:00. This issue is addressed via the existing NHH to HHR trader replacement read (RR) clauses.	Noted. This is included in Issue 11
IntelliHub	Issue 12, Q3. How material is this issue?		
Mercury	Issue 12, Q3. How material is this issue?	Non Issue	Noted

⁵ The definitions are not incompatible: the NHH meter read definition spells out the period for which a NHH read covers, the switch event read definition makes it clear it is a boundary read i.e. a start read for gaining trader, not a consumption read for the first day of ownership.

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 12, Q3. How material is this issue?	Unclear.	Noted
Metrix	Issue 12, Q3. How material is this issue?		
Northpower	Issue 12, Q3. How material is this issue?		
Nova Energy	Issue 12, Q3. How material is this issue?	May cause issues with Reconciliation, dependant on Trader systems for the Recording of reads and the Read Times	Noted
Orion Energy	Issue 12, Q3. How material is this issue?		
Powerco	Issue 12, Q3. How material is this issue?		
Simply Energy	Issue 12, Q3. How material is this issue?		
Tenco	Issue 12, Q3. How material is this issue?		
Trustpower	Issue 12, Q3. How material is this issue?	Medium to high	Noted
Unison Networks	Issue 12, Q3. How material is this issue?		
Vector	Issue 12, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Wellington Electricity	Issue 12, Q3. How material is this issue?		
Issue 12: Different timeframes for applying a meter reading to a NHH ICP switch add complexity to the ICP switching process Q4. Is this issue getting worse			
Contact Energy	Issue 12, Q4. Is this issue getting worse?	No	Noted
Electric Kiwi	Issue 12, Q4. Is this issue getting worse?	We do not currently reconcile NHH, but we support any move to ensure consistency between meter reads and reduce UFE or incorrect ICP days in reconciliation.	Noted
Flick Energy	Issue 12, Q4. Is this issue getting worse?	Yes, this is getting worse with the increase in switch activities.	Noted
Genesis Energy	Issue 12, Q4. Is this issue getting worse?	<i>This relates to issue 6</i> The confusion could be becoming more prevalent as more HHR traders emerge.	Noted
IntelliHub	Issue 12, Q4. Is this issue getting worse?		
Mercury	Issue 12, Q4. Is this issue getting worse?	Non Issue	Noted

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 12, Q4. Is this issue getting worse?	Unsure.	Noted
Metrix	Issue 12, Q4. Is this issue getting worse?		
Northpower	Issue 12, Q4. Is this issue getting worse?		
Nova Energy	Issue 12, Q4. Is this issue getting worse?		
Orion Energy	Issue 12, Q4. Is this issue getting worse?		
Powerco	Issue 12, Q4. Is this issue getting worse?		
Simply Energy	Issue 12, Q4. Is this issue getting worse?		
Tenco	Issue 12, Q4. Is this issue getting worse?		
Trustpower	Issue 12, Q4. Is this issue getting worse?	Yes	Noted
Unison Networks	Issue 12, Q4. Is this issue getting worse?		
Vector	Issue 12, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Wellington Electricity	Issue 12, Q4. Is this issue getting worse?		
Issue 12: Different timeframes for applying a meter reading to a NHH ICP switch add complexity to the ICP switching process Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 12, Q5. Why do you think this issue is occurring?	Contact considers the intention of the Code is well understood by Traders and the Code simply needs to be updated to clearly articulate what the requirement is.	Noted
Electric Kiwi	Issue 12, Q5. Why do you think this issue is occurring?	We do not currently reconcile NHH, but we support any move to ensure consistency between meter reads and reduce UFE or incorrect ICP days in reconciliation.	Noted
Flick Energy	Issue 12, Q5. Why do you think this issue is occurring?	The code is inconsistent in its approach in determining when a NHH switch event meter reading applies.	Noted. This is included in Issue 11
Genesis Energy	Issue 12, Q5. Why do you think this issue is occurring?	<i>This relates to issue 6</i> See response to Q2.	Noted
IntelliHub	Issue 12, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Mercury	Issue 12, Q5. Why do you think this issue is occurring?	Non Issue	Noted
Meridian and Powershop	Issue 12, Q5. Why do you think this issue is occurring?	Unsure.	Noted
Metrix	Issue 12, Q5. Why do you think this issue is occurring?		
Northpower	Issue 12, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 12, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 12, Q5. Why do you think this issue is occurring?		
Powerco	Issue 12, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 12, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Tenco	Issue 12, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 12, Q5. Why do you think this issue is occurring?	System processes were not designed for handling AMI midnight readings and final dates on matching switching event dates.	Noted
Unison Networks	Issue 12, Q5. Why do you think this issue is occurring?		
Vector	Issue 12, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 12, Q5. Why do you think this issue is occurring?		
Issue 13: Sometimes switch event meter readings cannot be obtained despite best endeavours Q3. How material is this issue?			
Contact Energy	Issue 13, Q3. How material is this issue?	Low impact	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 13, Q3. How material is this issue?	We agree that this an issue, especially the rare instances noted in section 4.80 of the issues paper. A solution to this issue could be that the EA include a clause or guidelines about what constitutes "best endeavours". As an alternative, a good solution would be that this becomes the responsibility of the MEP who's meter was onsite, if it was a communicating AML meter.	Noted. This is included in Issue 12
Flick Energy	Issue 13, Q3. How material is this issue?	Where reads cannot be obtained due to a valid reason such as access issues and customers not co-operating there should be a standard method for determining an average profile for usage at the property.	Noted. The RPS profile could be used for that purpose for NHH settlement, and historic data used for HHR settlement
Genesis Energy	Issue 13, Q3. How material is this issue?	Yes, this is a material issue that should be addressed. The most common outcome we observe is that the status on the registry becomes misaligned e.g. when the current trader disconnects the ICP just as sign up with a new trader occurs and the notification file is delivered to the registry before current trader's status event - 'ACTIVE' to 'INACTIVE' - is registered; the gaining trader reconnects the ICP as part of sign up but no update to registry is made as the status is 'ACTIVE'; then the switch completes and the losing trader resends their original status event leaving the registry status reading as 'INACTIVE'.	Noted. This response relates to Issue 14 in the first consultation round and Issue 13 in the second consultation round
IntelliHub	Issue 13, Q3. How material is this issue?		
Mercury	Issue 13, Q3. How material is this issue?	Non Issue	Noted
Meridian and	Issue 13, Q3. How	Meridian / Powershop considers the issue to be reasonably	Noted

Submitter	Question	Submission	Authority response
Powershop	material is this issue?	material.	
Metrix	Issue 13, Q3. How material is this issue?		
Northpower	Issue 13, Q3. How material is this issue?		
Nova Energy	Issue 13, Q3. How material is this issue?	Due to the infrequency of circumstances resulting in a validated meter reading or a permanent estimate being unable to be gained, this issue is not very relative. The Code needs to be updated to reflect to ensure when these extenuating circumstances arise, it does not result in a breach for the Responsible Trader.	Noted. This is included in Issue 12
Orion Energy	Issue 13, Q3. How material is this issue?		
Powerco	Issue 13, Q3. How material is this issue?		
Simply Energy	Issue 13, Q3. How material is this issue?		
Tenco	Issue 13, Q3. How material is this issue?		
Trustpower	Issue 13, Q3. How material is this issue?	Medium	Noted
Unison Networks	Issue 13, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Vector	Issue 13, Q3. How material is this issue?		
Wellington Electricity	Issue 13, Q3. How material is this issue?		
Issue 13: Sometimes switch event meter readings cannot be obtained despite best endeavours			
Q4. Is this issue getting worse?			
Contact Energy	Issue 13, Q4. Is this issue getting worse?	No	Noted
Electric Kiwi	Issue 13, Q4. Is this issue getting worse?	We agree that this an issue, especially the rare instances noted in section 4.80 of the issues paper. A solution to this issue could be that the EA include a clause or guidelines about what constitutes "best endeavours". As an alternative, a good solution would be that this becomes the responsibility of the MEP who's meter was onsite, if it was a communicating AMI meter.	Noted. Refer to response above
Flick Energy	Issue 13, Q4. Is this issue getting worse?	Yes	Noted
Genesis Energy	Issue 13, Q4. Is this issue getting worse?	It is static.	Noted
IntelliHub	Issue 13, Q4. Is this issue getting worse?		
Mercury	Issue 13, Q4. Is this issue getting worse?	Non Issue	Noted

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 13, Q4. Is this issue getting worse?	Yes.	Noted
Metrix	Issue 13, Q4. Is this issue getting worse?		
Northpower	Issue 13, Q4. Is this issue getting worse?		
Nova Energy	Issue 13, Q4. Is this issue getting worse?	No, it is still rare.	Noted
Orion Energy	Issue 13, Q4. Is this issue getting worse?		
Powerco	Issue 13, Q4. Is this issue getting worse?		
Simply Energy	Issue 13, Q4. Is this issue getting worse?		
Tenco	Issue 13, Q4. Is this issue getting worse?		
Trustpower	Issue 13, Q4. Is this issue getting worse?	No	Noted
Unison Networks	Issue 13, Q4. Is this issue getting worse?		
Vector	Issue 13, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Wellington Electricity	Issue 13, Q4. Is this issue getting worse?		
Issue 13: Sometimes switch event meter readings cannot be obtained despite best endeavours Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 13, Q5. Why do you think this issue is occurring?	Contact agrees with the problems identified under issue 13. Contact believes the Code should be amended to reflect reality and not penalise Traders or create technical breaches where there is few options to comply.	Noted
Electric Kiwi	Issue 13, Q5. Why do you think this issue is occurring?	We agree that this an issue, especially the rare instances noted in section 4.80 of the issues paper. A solution to this issue could be that the EA include a clause or guidelines about what constitutes "best endeavours". As an alternative, a good solution would be that this becomes the responsibility of the MEP who's meter was onsite, if it was a communicating AML meter.	Noted. Refer to response above
Flick Energy	Issue 13, Q5. Why do you think this issue is occurring?	The code does not have room for the exceptions where meter reading cannot be received due to a reasonable reason.	There are exceptions, refer to Clauses 7 to 9 of Schedule 15.2
Genesis Energy	Issue 13, Q5. Why do you think this issue is occurring?	We believe it is the result of a rule to lock the ICP when a switch is in progress that has been around since the registry was established. While there were probably valid reasons for doing so at that time, it is timely to reconsider whether certain fields should be updateable during the switch process e.g. status and nominated MEP.	Noted. This is included in Issue 13
IntelliHub	Issue 13, Q5. Why do		

Submitter	Question	Submission	Authority response
	you think this issue is occurring?		
Mercury	Issue 13, Q5. Why do you think this issue is occurring?	Non Issue	Noted
Meridian and Powershop	Issue 13, Q5. Why do you think this issue is occurring?	Given the volume of AMI metering in the market, the number of ICP's that are switching without valid readings have risen to the top of exception lists across the industry. It is unclear whether the switch review process will resolve the issue, but it may highlight a wording change in the Code to ensure participants are not in breach of the Code in these instances.	Noted. This is included in Issue 3
Metrix	Issue 13, Q5. Why do you think this issue is occurring?		
Northpower	Issue 13, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 13, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 13, Q5. Why do you think this issue is occurring?		
Powerco	Issue 13, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
Simply Energy	Issue 13, Q5. Why do you think this issue is occurring?		
Tenco	Issue 13, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 13, Q5. Why do you think this issue is occurring?	Fewer customers want to give access for legacy sites and non-communicating meters or de-energised AMI sites.	Noted. This is a contractual issue between the trader and the customer
Unison Networks	Issue 13, Q5. Why do you think this issue is occurring?		
Vector	Issue 13, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 13, Q5. Why do you think this issue is occurring?		
Issue 14: Preventing losing traders from updating an ICP identifier during a switch can mean the gaining trader is unaware the ICP is electrically disconnected Q3. How material is this issue?			
Contact Energy	Issue 14, Q3. How material is this issue?	Low impact	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 14, Q3. How material is this issue?	<p>We consider this a significant pain point in the current switching process, and prevents the losing trader from being able to provide the gaining trader valuable information on the ICP. As mentioned in the switching paper, this issue has the ability to create a very negative first experience for the customer.</p> <p>The ideal solution is to allow losing traders should be allowed to update the registry. A second preferred solution would be to allow traders to update the registry with the disconnected status as soon as the disconnection is complete, which would include being able to select a future date (tomorrow) as the date the ICP becomes Inactive. Currently we need to wait till day after the disconnection for this update to be done so that it is not future dated.</p>	Noted. This is included in Issue 13
Flick Energy	Issue 14, Q3. How material is this issue?	<p>This has an adverse effect on first customer experience as the reconnection process is delayed due to the incorrect status shown in registry.</p> <p>This also leads to gaining retailers breaching the status code if registry is not updated within 5 working days due to delay in switch.</p>	Noted. This is included in Issue 13
Genesis Energy	Issue 14, Q3. How material is this issue?		
IntelliHub	Issue 14, Q3. How material is this issue?		
Mercury	Issue 14, Q3. How material is this issue?	Ongoing issue but has not much impact on customers with AMI meters. Impact will be for non-smart sites. The losing retailer is unable to update the ICP status during a switch, which can lead to noncompliance. As the gaining retailer will be unaware of the	Noted. This is included in Issue 13

Submitter	Question	Submission	Authority response
		connection status the customer might have a negative experience.	
Meridian and Powershop	Issue 14, Q3. How material is this issue?	Very, given it is a health and safety issue.	Noted
Metrix	Issue 14, Q3. How material is this issue?		
Northpower	Issue 14, Q3. How material is this issue?	<p><i>Although we do not experience a large number of cases of disconnections during the switch process, the few cases we have do cause additional work as the staff rely on the Registry data being correct. If a customer or new retailer says the ICP is disconnected when the Registry has an Active (connected) status then additional questions need to be asked of the customer or new retailer.</i></p> <p><i>Northpower agrees that the customer experience especially is adversely affected and gives a bad impression on industry efficiency.</i></p>	Noted
Nova Energy	Issue 14, Q3. How material is this issue?	As this impacts both Traders compliance and can impact the customer this is highly material; it can result in delays having the customer's power reconnected as faults process may be followed to the point of having an electrician visit the premise. It can mean that the ICP completes the switch with incorrect metering information and result in a breach for either or both Traders.	Noted. This is included in Issue 13
Orion Energy	Issue 14, Q3. How material is this issue?		
Powerco	Issue 14, Q3. How		

Submitter	Question	Submission	Authority response
	material is this issue?		
Simply Energy	Issue 14, Q3. How material is this issue?	This can be an issue although in most cases the end customer tells you if they have no power and it is assumed the losing trader is not up to date in updating the Registry.	Noted
Tenco	Issue 14, Q3. How material is this issue?		
Trustpower	Issue 14, Q3. How material is this issue?	Medium	Noted
Unison Networks	Issue 14, Q3. How material is this issue?		
Vector	Issue 14, Q3. How material is this issue?		
Wellington Electricity	Issue 14, Q3. How material is this issue?		
Issue 14: Preventing losing traders from updating an ICP identifier during a switch can mean the gaining trader is unaware the ICP is electrically disconnected Q4. Is this issue getting worse?			
Contact Energy	Issue 14, Q4. Is this issue getting worse?	No	Noted

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 14, Q4. Is this issue getting worse?	<p>We consider this a significant pain point in the current switching process, and prevents the losing trader from being able to provide the gaining trader valuable information on the ICP. As mentioned in the switching paper, this issue has the ability to create a very negative first experience for the customer.</p> <p>The ideal solution is to allow losing traders should be allowed to update the registry. A second preferred solution would be to allow traders to update the registry with the disconnected status as soon as the disconnection is complete, which would include being able to select a future date (tomorrow) as the date the ICP becomes Inactive. Currently we need to wait till day after the disconnection for this update to be done so that it is not future dated.</p>	Noted. Refer to response above
Flick Energy	Issue 14, Q4. Is this issue getting worse?	Yes	Noted
Genesis Energy	Issue 14, Q4. Is this issue getting worse?		
IntelliHub	Issue 14, Q4. Is this issue getting worse?		
Mercury	Issue 14, Q4. Is this issue getting worse?	<p>Yes as retailers are getting more and more proactive at disconnecting for vacancy especially with increasing remote disconnection capability. During sign up, customers inform the trader that the site is disconnected. The AN sent for each NT receipt reflects the status of the ICP and gaining trader can also act on the AN status received. The issue is also for legacy meters since disconnection can happen after requesting for the site.</p>	Noted. This is included in Issue 13

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 14, Q4. Is this issue getting worse?	Yes.	Noted
Metrix	Issue 14, Q4. Is this issue getting worse?		
Northpower	Issue 14, Q4. Is this issue getting worse?	<i>Not noticeably</i>	Noted
Nova Energy	Issue 14, Q4. Is this issue getting worse?	There has been an observed increase in customers who are without power when this is not reflected on the Registry and neither Trader can update the Registry until the Switch has completed.	Noted. This has been included in Issue 13
Orion Energy	Issue 14, Q4. Is this issue getting worse?		
Powerco	Issue 14, Q4. Is this issue getting worse?		
Simply Energy	Issue 14, Q4. Is this issue getting worse?	Status Quo.	Noted
Tenco	Issue 14, Q4. Is this issue getting worse?		
Trustpower	Issue 14, Q4. Is this issue getting worse?	Yes	Noted
Unison Networks	Issue 14, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Vector	Issue 14, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 14, Q4. Is this issue getting worse?		
Issue 14: Preventing losing traders from updating an ICP identifier during a switch can mean the gaining trader is unaware the ICP is electrically disconnected Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 14, Q5. Why do you think this issue is occurring?	Contact agrees with the problems identified under issue 14 and would support Traders being able to update ICP events while a switch is in progress.	Noted
Electric Kiwi	Issue 14, Q5. Why do you think this issue is occurring?	<p>We consider this a significant pain point in the current switching process, and prevents the losing trader from being able to provide the gaining trader valuable information on the ICP. As mentioned in the switching paper, this issue has the ability to create a very negative first experience for the customer.</p> <p>The ideal solution is to allow losing traders should be allowed to update the registry. A second preferred solution would be to allow traders to update the registry with the disconnected status as soon as the disconnection is complete, which would include being able to select a future date (tomorrow) as the date the ICP becomes Inactive. Currently we need to wait till day after the disconnection for this update to be done so that it is not future dated.</p>	Noted. Refer to response above
Flick Energy	Issue 14, Q5. Why do you think this issue is occurring?	The inability for registry to allow a status update during a switch process leads to this issue.	Noted. This is included in Issue 13

Submitter	Question	Submission	Authority response
Genesis Energy	Issue 14, Q5. Why do you think this issue is occurring?		
IntelliHub	Issue 14, Q5. Why do you think this issue is occurring?		
Mercury	Issue 14, Q5. Why do you think this issue is occurring?	<p>Even with tight time frames for job completion returns from MEPs & Contractors and retailers updating their systems it will never be as fast as a customer calling and initiating a switch. The reason for the issue is losing retailers cannot update the status once that switch is initiated. The reason these are occurring is well explained in Issue 14 point 4.82</p> <p>Retailers should be updating the registry as soon as a disconnection has occurred.</p> <p>If a site has been disconnected, but not updated, then the losing retailer should make sure that the gaining retailer is aware of this.</p>	Noted. This is included in Issue 13
Meridian and Powershop	Issue 14, Q5. Why do you think this issue is occurring?	With the continual encouragement of customers to switch through various campaigns, there are times that a trader is unable to get the status update on to the registry prior to an NT file being received by the registry/RM.	Noted. This is included in Issue 13
Metrix	Issue 14, Q5. Why do you think this issue is occurring?		
Northpower	Issue 14, Q5. Why do you think this issue is	<i>Delays in updating the Registry by traders along with the design of the Registry.</i>	Noted. This is included in Issue 13

Submitter	Question	Submission	Authority response
	occurring?		
Nova Energy	Issue 14, Q5. Why do you think this issue is occurring?	This is caused by unfortunate timing of work being completed and switches being initiated on the Registry. Withdrawing switches to correctly update the Registry is not a positive resolution as this causes further inefficiencies to the Switching process and delays to the customers.	Noted. This is not an option suggested
Orion Energy	Issue 14, Q5. Why do you think this issue is occurring?		
Powerco	Issue 14, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 14, Q5. Why do you think this issue is occurring?	Delays in receiving confirmation from the contractors who perform these functions, sometimes they are not directly employed by the trader.	Noted
Tenco	Issue 14, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 14, Q5. Why do you think this issue is occurring?	It is easier to disconnect remotely in bulk.	Noted
Unison Networks	Issue 14, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Vector	Issue 14, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 14, Q5. Why do you think this issue is occurring?		
Issue 15: The Code is ambiguous as to whether a switch event meter reading is required for certain ICPs with a category 3—5 metering installation Q3. How material is this issue?			
Contact Energy	Issue 15, Q3. How material is this issue?	Low impact	Noted
Electric Kiwi	Issue 15, Q3. How material is this issue?	We do not supply category 3-5 metering installations and do not have a comment on this issue.	Noted
Flick Energy	Issue 15, Q3. How material is this issue?	Flick currently do not retail Category 3 – 5 meters.	Noted
Genesis Energy	Issue 15, Q3. How material is this issue?		
IntelliHub	Issue 15, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Mercury	Issue 15, Q3. How material is this issue?	It is an issue but not material. More an inefficiency.	Noted
Meridian and Powershop	Issue 15, Q3. How material is this issue?	Unsure.	Noted
Metrix	Issue 15, Q3. How material is this issue?		
Northpower	Issue 15, Q3. How material is this issue?		
Nova Energy	Issue 15, Q3. How material is this issue?	<p>As the gaining Trader in most instances will not have a read to complete a switch for a Category 3 – 5 this will most definitely delay the process.</p> <p>Options would be to either:</p> <ul style="list-style-type: none"> • Make it so reads are not required • Make to so the Losing trade is to complete the switch <p>Note: most instances of this type of switch are for the 1st of the new month.</p>	Noted. This is partly included in Issue 14
Orion Energy	Issue 15, Q3. How material is this issue?		
Powerco	Issue 15, Q3. How material is this issue?		
Simply Energy	Issue 15, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Tenco	Issue 15, Q3. How material is this issue?		
Trustpower	Issue 15, Q3. How material is this issue?	High	Noted
Unison Networks	Issue 15, Q3. How material is this issue?		
Vector	Issue 15, Q3. How material is this issue?		
Wellington Electricity	Issue 15, Q3. How material is this issue?		
Issue 15: The Code is ambiguous as to whether a switch event meter reading is required for certain ICPs with a category 3—5 metering installation Q4. Is this issue getting worse?			
Contact Energy	Issue 15, Q4. Is this issue getting worse?	No	Noted
Electric Kiwi	Issue 15, Q4. Is this issue getting worse?	We do not supply category 3-5 metering installations and do not have a comment on this issue.	Noted
Flick Energy	Issue 15, Q4. Is this		

Submitter	Question	Submission	Authority response
	issue getting worse?		
Genesis Energy	Issue 15, Q4. Is this issue getting worse?		
IntelliHub	Issue 15, Q4. Is this issue getting worse?		
Mercury	Issue 15, Q4. Is this issue getting worse?		
Meridian and Powershop	Issue 15, Q4. Is this issue getting worse?	Unsure.	Noted
Metrix	Issue 15, Q4. Is this issue getting worse?		
Northpower	Issue 15, Q4. Is this issue getting worse?		
Nova Energy	Issue 15, Q4. Is this issue getting worse?		
Orion Energy	Issue 15, Q4. Is this issue getting worse?		
Powerco	Issue 15, Q4. Is this issue getting worse?		
Simply Energy	Issue 15, Q4. Is this issue getting worse?		
Tenco	Issue 15, Q4. Is this		

Submitter	Question	Submission	Authority response
	issue getting worse?		
Trustpower	Issue 15, Q4. Is this issue getting worse?	Yes	Noted
Unison Networks	Issue 15, Q4. Is this issue getting worse?		
Vector	Issue 15, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 15, Q4. Is this issue getting worse?		
Issue 15: The Code is ambiguous as to whether a switch event meter reading is required for certain ICPs with a category 3—5 metering installation Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 15, Q5. Why do you think this issue is occurring?	Contact agrees with the problems identified under issue 15. Contact also notes that the registry functionality also needs to be amended where genuine C&I or ToU Cat 2 meters are forcing losing Traders to provide CS file. It is our view that this was an unintended consequence of a previous registry functional change and losing Traders are now required to provide CS files due to the switch request (NT file) validations forcing these particular types of metering setups through the mass market switching process. This has created an unnecessary additional switching process for losing Traders as the gaining Trader should be able to complete the switch in such cases.	Noted. That was the intended outcome of the Code amendment.

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 15, Q5. Why do you think this issue is occurring?	We do not supply category 3-5 metering installations and do not have a comment on this issue.	Noted
Flick Energy	Issue 15, Q5. Why do you think this issue is occurring?		
Genesis Energy	Issue 15, Q5. Why do you think this issue is occurring?		
IntelliHub	Issue 15, Q5. Why do you think this issue is occurring?		
Mercury	Issue 15, Q5. Why do you think this issue is occurring?	Since CAT3-5 sites will generally be TOU, Mercury suggests the need for a 'switch read' is unnecessary. Mercury occasionally have to do this when a TOU site switch-out, but the work around is to put '0' as an actual read whenever this comes up.	Noted. This is included in Issue 14 for non AMI HHR metering
Meridian and Powershop	Issue 15, Q5. Why do you think this issue is occurring?	Unsure.	Noted
Metrix	Issue 15, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
Northpower	Issue 15, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 15, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 15, Q5. Why do you think this issue is occurring?		
Powerco	Issue 15, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 15, Q5. Why do you think this issue is occurring?		
Tenco	Issue 15, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 15, Q5. Why do you think this issue is occurring?	Lack of clarity regarding submissions and meter configuration. Also there is more switching activity.	Noted
Unison Networks	Issue 15, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
Vector	Issue 15, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 15, Q5. Why do you think this issue is occurring?		
Issue 16: The replacement read process is inefficient			
Q3. How material is this issue?			
Contact Energy	Issue 16, Q3. How material is this issue?	Medium impact	Noted
Electric Kiwi	Issue 16, Q3. How material is this issue?	<p>We very much agree that this major inefficiency in the current switching process. It adds significant operational overhead to both the gaining and losing trader for what can be very insignificant amounts of energy (as little as 1 kWh). As of 25 October, we had sent over 9,000 RRs so far this year, which gives an indication of the level of operational burden created. Over 28% of all CS files we have received this year have been estimated reads. As a trader who only accepts communicating AMI meters, we find this to be unnecessarily high and many times puts us at risk of non-compliance when we may not have control over getting a timely read for the MEP in order to send a replacement read.</p> <p>We have a number of proposed solutions to this issue, some of which have also been mentioned as solutions to other issues:</p> <p>1) MEP required to provide midnight read on switch date to</p>	<p>Noted</p> <p>Noted. Included in Issue 5</p>

Submitter	Question	Submission	Authority response
		<p>registry, gaining trader, and losing trader within 5 business days of NT received (Preferred)</p> <p>2) Allowing traders up to 10 business days to submit a replacement read</p> <p>3) MEP to provide start read to gaining trader within 5 business days (down from 10)</p> <p>4) If the ICP has a communicating AMI meter, the losing trader must submit an actual midnight read. If actual reads are unavailable, then the AMI Comms Flag must be set to N</p> <p>5) Establish a threshold for the minimum kWh difference between the CS read and the gaining traders start read (such as 10 kWh). If the difference is less than this amount, then an RR is not required</p> <p>6) The losing trader should be able to initiate replacement reads</p> <p>7) Allowing an RR up to the last revision period as long as both parties agree and is correctly reconciled</p>	<p>Noted. Included in Issue 5</p> <p>Noted. Included in Issue 15</p> <p>Noted. Included in Issue 15</p> <p>Noted. Included in Issue 15</p> <p>Noted. Included in Issue 15</p> <p>Noted. Included in part in Issue</p>
Flick Energy	Issue 16, Q3. How material is this issue?	<p>Along with creating complexity in back office operations the inefficiency in the replacement read process disadvantages the customers. Customers should be billed on the consumption accumulated from their event date with their gaining retailer and not for consumption which has accrued with their losing retailer or consumption of other customers. Flick perceives the inefficiency in RR process as obstructing innovation and accuracy.</p> <p>The retailers submitting reads in the CS file from anytime of the day and marking this as an actual read are also contributing to</p>	Noted. Included in Issue 4

Submitter	Question	Submission	Authority response
		<p>this inefficiency.</p> <p>The current replacement read process adversely affects the accuracy of the market settlement and customer invoicing.</p>	
Genesis Energy	Issue 16, Q3. How material is this issue?	<p><i>This relates to issues 5 and 6</i></p> <p>All the shortcomings identified in the paper present inefficiencies for parties involved.</p>	Noted
IntelliHub	Issue 16, Q3. How material is this issue?		
Mercury	Issue 16, Q3. How material is this issue?	Very material as there are a lot of different scenarios in the RR process	Noted
Meridian and Powershop	Issue 16, Q3. How material is this issue?	Very.	Noted
Metrix	Issue 16, Q3. How material is this issue?		
Northpower	Issue 16, Q3. How material is this issue?		
Nova Energy	Issue 16, Q3. How material is this issue?	<p>Some of the identified shortcomings of the current RR process are more material than others;</p> <p>Shortcoming 2 – due to the timeframes being effective from the switch effective date rather than the date the switch was completed on the Registry this means Traders have a small window to remain compliant or have to absorb the error. Moving the timeframe to start when the switch has completed would allow more opportunity to correct reads for the customer and for</p>	Noted. Included in Issue 15

Submitter	Question	Submission	Authority response
		<p>the gaining Trader to remain compliant.</p> <p>Shortcoming 3 – Further details on what the scope for correction is acceptable across the industry, as while the usage shouldn't be too small as to make it inefficient to process, given the speed accurate reads can be gained for AMI readings the threshold should be smaller than the current 200kmh allowed in the RR process.</p> <p>Shortcoming 7 – Provisions also need to be included in the code for instances where internal (HHR) and external read registers do not match, as can sometimes occur in the case in ARC meters. Traders could be utilising actual reads from different registers resulting in reconciliation issues.</p>	<p>Noted. Included in Issue 15</p> <p>Noted. This is an issue for the MEP to deal with</p>
Orion Energy	Issue 16, Q3. How material is this issue?		
Powerco	Issue 16, Q3. How material is this issue?		
Simply Energy	Issue 16, Q3. How material is this issue?	This is material, this part of the switching process would be one of the biggest time wasters.	Noted
Tenco	Issue 16, Q3. How material is this issue?		
Trustpower	Issue 16, Q3. How material is this issue?	High	Noted
Unison Networks	Issue 16, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Vector	Issue 16, Q3. How material is this issue?		
Wellington Electricity	Issue 16, Q3. How material is this issue?		
Issue 16: The replacement read process is inefficient Q4. Is this issue getting worse?			
Contact Energy	Issue 16, Q4. Is this issue getting worse?	No	Noted
Electric Kiwi	Issue 16, Q4. Is this issue getting worse?	<p>We very much agree that this major inefficiency in the current switching process. It adds significant operational overhead to both the gaining and losing trader for what can be very insignificant amounts of energy (as little as 1 kWh). As of 25 October, we had sent over 9,000 RRs so far this year, which gives an indication of the level of operational burden created. Over 28% of all CS files we have received this year have been estimated reads. As a trader who only accepts communicating AMI meters, we find this to be unnecessarily high and many times puts us at risk of non-compliance when we may not have control over getting a timely read for the MEP in order to send a replacement read.</p> <p>We have a number of proposed solutions to this issue, some of which have also been mentioned as solutions to other issues:</p> <ol style="list-style-type: none"> 1) MEP required to provide midnight read on switch date to registry, gaining trader, and losing trader within 5 business days of NT received (Preferred) 2) Allowing traders up to 10 business days to submit a 	Noted. Refer to response above

Submitter	Question	Submission	Authority response
		<p>replacement read</p> <p>3) MEP to provide start read to gaining trader within 5 business days (down from 10)</p> <p>4) If the ICP has a communicating AMI meter, the losing trader must submit an actual midnight read. If actual reads are unavailable, then the AMI Comms Flag must be set to N</p> <p>5) Establish a threshold for the minimum kWh difference between the CS read and the gaining traders start read (such as 10 kWh). If the difference is less than this amount, then an RR is not required</p> <p>6) The losing trader should be able to initiate replacement reads</p> <p>7) Allowing an RR up to the last revision period as long as both parties agree and is correctly reconciled</p>	
Flick Energy	Issue 16, Q4. Is this issue getting worse?	With the increase in use of estimate reads and reads from anytime of the day in the CS file is making this issue worse.	Noted
Genesis Energy	Issue 16, Q4. Is this issue getting worse?	<p><i>This relates to issues 5 and 6</i></p> <p>In our view it is likely more disconnects will happen as new retail business models emerge. There are two potential solutions we see:</p> <ul style="list-style-type: none"> a) amending the switch process to reduce the need for read adjustments; or b) refining the RR process itself. <p>We consider that having MEPs provide switch reads on ICPs with AMI would dramatically reduce the number of RRs required. The shortcomings that have been identified can be resolved as follows:</p>	Noted. Included in Issue 3

Submitter	Question	Submission	Authority response
		<ol style="list-style-type: none"> 1) this is not a shortcoming of the RR process but the reasoning for its existence; 2) a simple alteration can be made to make the 4-month period start from the CS file date, not the switch event date; 3) a reasonable ICP threshold should be introduced - in the times of only NHH metering, 200 kilowatt hours was determined to be appropriate as that roughly equated to the cost to parties of amending the reads and amounts less than that did not have significant impacts on a monthly bill. With the advent of HH and the associated greater resolution of consumption it may be timely to review this threshold; 4) a simple change to allow either party to initiate the read amendment could be made, and we note this currently happens in the sense a losing trader may advise the gaining trader they now have actual read and can request they initiate, however the gaining trader can legitimately refuse if it is to their disadvantage; 5) this is addressed by having MEPs supply switch read for AMI ICPs, as above; and 6) this is addressed if the MEP supplies a time stamped reading. It is our understanding that MEPs may refuse to supply pre-switch date data if there are additional costs and time involved as a result of their systems being configured to deliver consumption data to the trader of the ICP at the time of the consumption i.e. extracting back dated periods is an exception process for them. 	<p>Noted</p> <p>Noted. Included in Issue 15</p> <p>Noted. Included in Issue 15 Option 3</p> <p>Noted. Included in Issue 15</p> <p>Noted. Included in Issue 3</p> <p>Noted. Included in Issue 15</p>

Submitter	Question	Submission	Authority response
IntelliHub	Issue 16, Q4. Is this issue getting worse?		
Mercury	Issue 16, Q4. Is this issue getting worse?	Getting worse and is very inefficient	Noted
Meridian and Powershop	Issue 16, Q4. Is this issue getting worse?	Yes.	Noted
Metrix	Issue 16, Q4. Is this issue getting worse?		
Northpower	Issue 16, Q4. Is this issue getting worse?		
Nova Energy	Issue 16, Q4. Is this issue getting worse?		
Orion Energy	Issue 16, Q4. Is this issue getting worse?		
Powerco	Issue 16, Q4. Is this issue getting worse?		
Simply Energy	Issue 16, Q4. Is this issue getting worse?	Yes if your switching activity increases.	Noted
Tenco	Issue 16, Q4. Is this issue getting worse?		
Trustpower	Issue 16, Q4. Is this issue getting worse?	Yes	Noted

Submitter	Question	Submission	Authority response
Unison Networks	Issue 16, Q4. Is this issue getting worse?		
Vector	Issue 16, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 16, Q4. Is this issue getting worse?		
Issue 16: The replacement read process is inefficient			
Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 16, Q5. Why do you think this issue is occurring?	Contact agrees with the problems identified with Issue 16. Contact believes that the entire switch reading renegotiation process requires reassessment. We also believe that introducing the MEP into the switching process to provide switch event readings will Improve this particular problem area.	Noted. Included in Issue 3
Electric Kiwi	Issue 16, Q5. Why do you think this issue is occurring?	<p>We very much agree that this major inefficiency in the current switching process. It adds significant operational overhead to both the gaining and losing trader for what can be very insignificant amounts of energy (as little as 1 kWh). As of 25 October, we had sent over 9,000 RRs so far this year, which gives an indication of the level of operational burden created. Over 28% of all CS files we have received this year have been estimated reads. As a trader who only accepts communicating AMI meters, we find this to be unnecessarily high and many times puts us at risk of non-compliance when we may not have control over getting a timely read for the MEP in order to send a replacement read.</p> <p>We have a number of proposed solutions to this issue, some of</p>	Noted. Refer to response above

Submitter	Question	Submission	Authority response
		<p>which have also been mentioned as solutions to other issues:</p> <ol style="list-style-type: none"> 1) MEP required to provide midnight read on switch date to registry, gaining trader, and losing trader within 5 business days of NT received (Preferred) 2) Allowing traders up to 10 business days to submit a replacement read 3) MEP to provide start read to gaining trader within 5 business days (down from 10) 4) If the ICP has a communicating AMI meter, the losing trader must submit an actual midnight read. If actual reads are unavailable, then the AMI Comms Flag must be set to N 5) Establish a threshold for the minimum kWh difference between the CS read and the gaining traders start read (such as 10 kWh). If the difference is less than this amount, then an RR is not required 6) The losing trader should be able to initiate replacement reads 7) Allowing an RR up to the last revision period as long as both parties agree and is correctly reconciled 	
Flick Energy	Issue 16, Q5. Why do you think this issue is occurring?	There is inconsistent use of actual readings used in the switching process and this has been promoted by the view of the EA that retailers can use an actual read from any time on the switch date that cannot be disputed through the RR process. For an efficient switching process we believe that the midnight read on the switch event date should always be used and should be the only undisputable switch read.	Noted. Included in Issue 5
Genesis Energy	Issue 16, Q5. Why do you think this issue is	<i>This relates to issues 5 and 6</i>	Noted

Submitter	Question	Submission	Authority response
	occurring?	We believe the initial drafting of the RR rules, which was during a time where there was only NHH billing, did not envisage the actual operational function of switching process.	
IntelliHub	Issue 16, Q5. Why do you think this issue is occurring?		
Mercury	Issue 16, Q5. Why do you think this issue is occurring?	<p>4.95</p> <p>(a) As only gaining retailer can send RR, MEEN would like to propose the losing retailer to initiate RR also</p> <p>(b) MEEN would also like to propose opening the current 4 month allowance to 10 months of the switch even date ie. If a mutual customer and trader agree to the RR. Because of the current rules we have to reject this.</p> <p>(c) Not so much an issue for NTTR as mutual customers will need to pay the catch up bill regardless. Mercury is comfortable with the 200kWh for each channel</p> <p>(d) Mercury are currently doing this at the moment, however for the non AMI reads which are fine, but with the non AMI reads we suggest a change on when the trader receives RR's (within 5 days) where the difference is very minimal ie. Less than 5 units, Mercury suggests this is changed to 10-20 units or above</p> <p>Shortcomings –</p> <p>(1) Not having actual reads in general can be an issue</p>	<p>Noted. Included in Issue 15</p> <p>Noted. Partly included in Issue 15</p> <p>Noted. It is not intended to change this at this stage</p> <p>Noted. Included in Issue 15</p> <p>Noted</p>

Submitter	Question	Submission	Authority response
		<p>(2) Suggest changing this to 10 months</p> <p>(3) A definite issue. Mercury suggests a threshold of 10-20 units</p> <p>(4) Mercury suggests th losing retailer to also initiate or send RR</p> <p>(5) Mercury would need to consider as there is no process in place. 5 business days is too short and Mercury proposes 10 days for MEP to provide a trader with actual read or 50% to be done in 5 days (if possible) otherwise to be done in 10 days.</p> <p>For HHR, sites these will be set up by the MEP as NHH (as we gain on that basis, even though it is an HHR site). It therefore creates additional transactions in the read replacement process.</p>	<p>Noted. Partly included in Issue 15</p> <p>Noted. Included in Issue 15</p> <p>Noted. Included in Issue 15</p> <p>Noted. Partly included in Issue 15</p>
Meridian and Powershop	Issue 16, Q5. Why do you think this issue is occurring?	<p>Now that there is extensive HHR settlement on NHH ICP's there is a need for the entire read replacement part of the Code to be reviewed. Given issue #13, the 4 month timeframe is not sufficient.</p> <p>The disputes process is not clear or fit for purpose and has never been used for this reason.</p> <p>Given issue #5, we are also reliant on third parties providing data within 5 days in order to complete the read replacement process for an AMI ICP as outlined in 11.3 clause 6 subclause 3 and 12 subclause 2B. Not all traders have agreements with MEP's to provide data.</p>	<p>Noted. Included in Issue 15</p> <p>Noted. Included in Issue 15</p> <p>Noted. Included in Issue 15</p>

Submitter	Question	Submission	Authority response
Metrix	Issue 16, Q5. Why do you think this issue is occurring?		
Northpower	Issue 16, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 16, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 16, Q5. Why do you think this issue is occurring?		
Powerco	Issue 16, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 16, Q5. Why do you think this issue is occurring?	There are a number of issues in this section however the one that affects us the most is backdated switches. There is currently no leeway in the rules when this occurs, especially for three or four months old switch event dates. The rules around timing of reads need to be reviewed and probably re-written.	Noted. Included in Issue 15
Tenco	Issue 16, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 16, Q5. Why do you think this issue is	Some traders are not using AML readings when they get them.	Noted. Included in Issue 5

Submitter	Question	Submission	Authority response
	occurring?	HHR submissions traders cannot bill on a reading that is not a midnight reading.	
Unison Networks	Issue 16, Q5. Why do you think this issue is occurring?		
Vector	Issue 16, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 16, Q5. Why do you think this issue is occurring?		
Issue 17: Delays to a trader being assigned a new ICP may delay installing a metering installation at the ICP and electrically connecting the ICP Q3. How material is this issue?			
Contact Energy	Issue 17, Q3. How material is this issue?	Low impact	Noted
Electric Kiwi	Issue 17, Q3. How material is this issue?	We do not handle new connections and have no comment on this issue.	Noted
Flick Energy	Issue 17, Q3. How	It is vital for the retailers to have control over when they can	Noted

Submitter	Question	Submission	Authority response
	material is this issue?	electrically connect the sites as they have an obligation to fulfil their customer's request.	
Genesis Energy	Issue 17, Q3. How material is this issue?	This issue only occurs within one network area that does not always move from 'NEW' to 'READY' in a timely fashion. Having had discussions with them, it is clear they are aware of their obligations but are hindered by delays in the return of paperwork from their contractors. A bypass of this delay would be to allow traders to accept ownership of an ICP and update certain fields e.g. nominate an MEP while the ICP record is in 'NEW' status.	Noted. This is included in Issue 16
IntelliHub	Issue 17, Q3. How material is this issue?		
Mercury	Issue 17, Q3. How material is this issue?		
Meridian and Powershop	Issue 17, Q3. How material is this issue?	Unsure.	Noted
Metrix	Issue 17, Q3. How material is this issue?		
Northpower	Issue 17, Q3. How material is this issue?	<i>As a Distributor we find that many of the traders do not use the "Disconnected – New Connection In Progress" status which means the trader cannot nominate the initial MEP or presumably cannot organise for the metering to be in place which delays the livening of the ICP.</i>	Noted. Included in Issue 16
Nova Energy	Issue 17, Q3. How material is this issue?	As this impacts both Traders compliance and can impact the customer this is highly material; it can result in delays having the customer's power connected. It can mean that the ICP	Noted. Included in Issue 16

Submitter	Question	Submission	Authority response
		completes the switch with no metering information; however metering may have already been installed or temporarily installed onsite; however the losing Trader has not populated the registry due to switch in progress, therefore causes further delay with the gaining Trader to confirm when the metering was installed so that the event date can reflect this which results in a breach for either or both Trader	
Orion Energy	Issue 17, Q3. How material is this issue?	<p><i>Specifically- if an ICP is moved from the "New" status to the "Ready" status on the date the ICP is ready for electrical connection, the responsible trader cannot organise for a metering installation to be in place at the ICP on the day the ICP is ready for electrical connection. This can lead to delays in electrically connecting the customer or embedded generator at the ICP.</i></p> <p>In our experience this issue is not material. We estimate that this situation would occur not more than 2 times per year.</p>	Noted
Powerco	Issue 17, Q3. How material is this issue?		
Simply Energy	Issue 17, Q3. How material is this issue?	This is material and can impact your ability to deal with some MEP's.	Noted. Included in Issue 16
Tenco	Issue 17, Q3. How material is this issue?		
Trustpower	Issue 17, Q3. How material is this issue?	Very Low	Noted
Unison Networks	Issue 17, Q3. How material is this issue?		
Vector	Issue 17, Q3. How		

Submitter	Question	Submission	Authority response
	material is this issue?		
Wellington Electricity	Issue 17, Q3. How material is this issue?		
Issue 17: Delays to a trader being assigned a new ICP may delay installing a metering installation at the ICP and electrically connecting the ICP Q4. Is this issue getting worse?			
Contact Energy	Issue 17, Q4. Is this issue getting worse?	No	Noted
Electric Kiwi	Issue 17, Q4. Is this issue getting worse?	We do not handle new connections and have no comment on this issue.	Noted
Flick Energy	Issue 17, Q4. Is this issue getting worse?	Yes	Noted
Genesis Energy	Issue 17, Q4. Is this issue getting worse?	No. It has improved over time.	Noted
IntelliHub	Issue 17, Q4. Is this issue getting worse?		
Mercury	Issue 17, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 17, Q4. Is this issue getting worse?	Unsure.	Noted
Metrix	Issue 17, Q4. Is this issue getting worse?		
Northpower	Issue 17, Q4. Is this issue getting worse?	<i>Due to changes in the metering relationship between traders and Northpower (as an MEP) recently we have experienced more delays in the livening process for new ICPs. These changes have effectively introduced additional parties into the process which has made co-ordination more difficult.</i>	Noted
Nova Energy	Issue 17, Q4. Is this issue getting worse?	No, it this is rare in occurrence	Noted
Orion Energy	Issue 17, Q4. Is this issue getting worse?	We don't believe the issue is getting worse.	Noted
Powerco	Issue 17, Q4. Is this issue getting worse?		
Simply Energy	Issue 17, Q4. Is this issue getting worse?	Yes when MEP's change their processes without consulting Traders and how their processes maybe affected.	Noted
Tenco	Issue 17, Q4. Is this issue getting worse?		
Trustpower	Issue 17, Q4. Is this issue getting worse?	No	Noted
Unison Networks	Issue 17, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Vector	Issue 17, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 17, Q4. Is this issue getting worse?		
Issue 17: Delays to a trader being assigned a new ICP may delay installing a metering installation at the ICP and electrically connecting the ICP Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 17, Q5. Why do you think this issue is occurring?	Contact agrees with the problems identified with issue 17, however consider this to be a minor issue. Consideration should be given to the costs of changing registry functionality and participants systems against the potential benefits, which in our view wouldn't necessarily be significant.	Noted. The cost of registry validation changes is expected to be minimal
Electric Kiwi	Issue 17, Q5. Why do you think this issue is occurring?	We do not handle new connections and have no comment on this issue.	Noted
Flick Energy	Issue 17, Q5. Why do you think this issue is occurring?	The timeframe to change from 'New' to ready status is not regulated through the code and thus the networks are not obligated to stick to any time frames.	Noted. Included in Issue 16
Genesis Energy	Issue 17, Q5. Why do you think this issue is occurring?	This is a result of field processes not aligning directly with Code requirements.	Noted

Submitter	Question	Submission	Authority response
IntelliHub	Issue 17, Q5. Why do you think this issue is occurring?		
Mercury	Issue 17, Q5. Why do you think this issue is occurring?		
Meridian and Powershop	Issue 17, Q5. Why do you think this issue is occurring?	Unsure.	Noted
Metrix	Issue 17, Q5. Why do you think this issue is occurring?		
Northpower	Issue 17, Q5. Why do you think this issue is occurring?	<p><i>We believe the issue is occurring due to:</i></p> <ul style="list-style-type: none"> <i>a) Traders not using the “Disconnected – New Connection In Progress” status</i> <i>b) The number of parties now involved in the ICP creation and livening process – Distributor, Trader, MEP, Meter Installer, and Livening Agent.</i> <p><i>All parties need to be co-ordinated and this co-ordination is spread over multiple parties – Distributor, Trader, and MEP.</i></p> <p><i>An efficient and effective method of electronic communication such as the Registry switching file process needs to be implemented to help manage the co-ordination of these multiple parties. This would also facilitate easy reporting and identification of where hold-ups are occurring in the process.</i></p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted. However the registry is not a real time work flow tool, and would be likely to delay the new connection process</p>

Submitter	Question	Submission	Authority response
Nova Energy	Issue 17, Q5. Why do you think this issue is occurring?	This is caused by timing of work completed and switches being initiated in the registry. In addition this can also be dependent on a Trader's internal process in how they manage new connections.	Noted
Orion Energy	Issue 17, Q5. Why do you think this issue is occurring?	In our experience this issue occurs most often when retailers are slow to or fail to pick up ICPs notified to them as ready.	Noted
Powerco	Issue 17, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 17, Q5. Why do you think this issue is occurring?	One MEP and maybe others are insisting on ICPs being claimed before they will issue the meter installation request. This means that all distributors must put the ICP to Ready for this to occur, not all distributors do this. However claiming does mean you can put to inactive – connection in progress.	Noted
Tenco	Issue 17, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 17, Q5. Why do you think this issue is occurring?	We do not see an issue with this. We would not want metering to be installed on an ICP until the distributor is sure that the network is ready and a trader has accepted responsibility.	Noted
Unison Networks	Issue 17, Q5. Why do you think this issue is occurring?		
Vector	Issue 17, Q5. Why do		

Submitter	Question	Submission	Authority response
	you think this issue is occurring?		
Wellington Electricity	Issue 17, Q5. Why do you think this issue is occurring?		
Issue 18: The process for switching ICPs between distributors is inefficient			
Q3. How material is this issue?			
Contact Energy	Issue 18, Q3. How material is this issue?	Medium to high impact	Noted
Electric Kiwi	Issue 18, Q3. How material is this issue?	We consider this to be a minor issue with little impact on us at this point in time. However, as there is expected to be more embedded network in the future, we feel that switching between distributors should be a process the includes notifying the trader through the registry. This will allow the trader a simple and efficient way to accept or reject, and can accurately be recorded for audit purposes.	Noted
Flick Energy	Issue 18, Q3. How material is this issue?	The distributor switching process is a manual process and is not transparent through the registry which creates complications for the retailers	Noted. Included in Issue 20
Genesis Energy	Issue 18, Q3. How material is this issue?		
IntelliHub	Issue 18, Q3. How material is this issue?		
Mercury	Issue 18, Q3. How		

Submitter	Question	Submission	Authority response
	material is this issue?		
Meridian and Powershop	Issue 18, Q3. How material is this issue?	Meridian / Powershop considers the issue to be reasonably material. As more embedded networks come on line this is becoming more time consuming. The process is very long winded, with the new distributor having to get permission from all the traders, and the fact that some traders wait until they have a UOSA in place can create more than one change of start date for an embedded network, and then advising the EA who then authorise the switch. Also there is no way of knowing that an ICP is in the Distributor Switching process.	Noted. Included in Issue 20
Metrix	Issue 18, Q3. How material is this issue?		
Northpower	Issue 18, Q3. How material is this issue?		
Nova Energy	Issue 18, Q3. How material is this issue?		
Orion Energy	Issue 18, Q3. How material is this issue?	<p><i>Specifically- Number of embedded networks increasing. Micro grids may operate as embedded networks in future increasing distributor switching requests. The registry does not show a distributor switch is pending. One trader refusing to consent to the ICP being switched between distributors can stall the switch for all. No easily accessible audit trail. Reversing the pending switch is a manual process.</i></p> <p>This issue is not material at this time however as you suggest secondary network arrangements are increasing which may increase the materiality of this issue over time.</p>	Noted. Included in Issue 20
Powerco	Issue 18, Q3. How	Q.3	Noted. Included in Issue 20

Submitter	Question	Submission	Authority response
	material is this issue?	Powerco agrees that the current process for switching Installation Control Points (ICPs) between Distributors is inefficient and amendments to this process are needed. We feel that the Electricity Authority (the Authority) has accurately captured the current issues in shortcomings 1 to 4.	
Simply Energy	Issue 18, Q3. How material is this issue?		
Tenco	Issue 18, Q3. How material is this issue?	This is very material issue from our perspective and this should be considered when the switch review goes further. The current process is manual where email's between participants is the only method available to advise the active retailer of ICP switches between distributors. A retailer often wins an ICP and will then be notified that the ICP is being switched.	Noted. Included in Issue 20
Trustpower	Issue 18, Q3. How material is this issue?		
Unison Networks	Issue 18, Q3. How material is this issue?		
Vector	Issue 18, Q3. How material is this issue?		
Wellington Electricity	Issue 18, Q3. How material is this issue?		
Issue 18: The process for switching ICPs between distributors is inefficient Q4. Is this issue getting worse?			

Submitter	Question	Submission	Authority response
Contact Energy	Issue 18, Q4. Is this issue getting worse?	Volumes of distributor switching or network change activity is increasing.	Noted
Electric Kiwi	Issue 18, Q4. Is this issue getting worse?	We consider this to be a minor issue with little impact on us at this point in time. However, as there is expected to be more embedded network in the future, we feel that switching between distributors should be a process the includes notifying the trader through the registry. This will allow the trader a simple and efficient way to accept or reject, and can accurately be recorded for audit purposes.	Noted
Flick Energy	Issue 18, Q4. Is this issue getting worse?	Yes, with more distributors entering the market especially the embedded networks this issue is getting worse.	Noted
Genesis Energy	Issue 18, Q4. Is this issue getting worse?		
IntelliHub	Issue 18, Q4. Is this issue getting worse?		
Mercury	Issue 18, Q4. Is this issue getting worse?		
Meridian and Powershop	Issue 18, Q4. Is this issue getting worse?	Yes, more and more embedded networks are being delayed. Also there are issues around where LE ICPS are involved.	Noted. Included in Issue 20
Metrix	Issue 18, Q4. Is this issue getting worse?		
Northpower	Issue 18, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Nova Energy	Issue 18, Q4. Is this issue getting worse?		
Orion Energy	Issue 18, Q4. Is this issue getting worse?	No this issue is not getting worse at this time however we agree that visibility of a distributor switch pending on the registry would be beneficial.	Noted
Powerco	Issue 18, Q4. Is this issue getting worse?	Q.4 Yes, the issue is getting worse, the expansion of embedded networks is making this issue more frequent.	Noted
Simply Energy	Issue 18, Q4. Is this issue getting worse?		
Tenco	Issue 18, Q4. Is this issue getting worse?	Yes, embedded networks are continually increasing, and the owners are selling their properties more frequently.	Noted
Trustpower	Issue 18, Q4. Is this issue getting worse?		
Unison Networks	Issue 18, Q4. Is this issue getting worse?		
Vector	Issue 18, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 18, Q4. Is this issue getting worse?		
Issue 18: The process for switching ICPs between distributors is inefficient Q5. Why do you think this issue is occurring?			

Submitter	Question	Submission	Authority response
Contact Energy	Issue 18, Q5. Why do you think this issue is occurring?	Contact agrees with the problems identified under Issue 18. Contact recommends that sensible Code and registry functionality changes are made to ensure this process is auditable and efficient, realising that industry activity involving embedded networks is increasing. The industry should look to introduce a regulated network switching process and support Code requirements to ensure all affected participants are involved and notified of any requests, changes or completions of network changes within set timeframes.	Noted. Included in Issue 20
Electric Kiwi	Issue 18, Q5. Why do you think this issue is occurring?	We consider this to be a minor issue with little impact on us at this point in time. However, as there is expected to be more embedded network in the future, we feel that switching between distributors should be a process the includes notifying the trader through the registry. This will allow the trader a simple and efficient way to accept or reject, and can accurately be recorded for audit purposes.	Noted. Included in Issue 20
Flick Energy	Issue 18, Q5. Why do you think this issue is occurring?	This issue is occurring as the registry does not have provision for switching ICPs between distributors.	Noted
Genesis Energy	Issue 18, Q5. Why do you think this issue is occurring?		
IntelliHub	Issue 18, Q5. Why do you think this issue is occurring?		
Mercury	Issue 18, Q5. Why do		

Submitter	Question	Submission	Authority response
	you think this issue is occurring?		
Meridian and Powershop	Issue 18, Q5. Why do you think this issue is occurring?	Mostly because of the fact there is no notification showing on the registry that a Distributor switch is in progress/or has occurred and the time frames around the switch.	Noted. Included in Issue 20
Metrix	Issue 18, Q5. Why do you think this issue is occurring?		
Northpower	Issue 18, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 18, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 18, Q5. Why do you think this issue is occurring?	Potentially the process is inefficient at present because it doesn't occur on a regular basis so business IP about the process needs to be refreshed each time the situation occurs.	Noted
Powerco	Issue 18, Q5. Why do you think this issue is occurring?	<p>Q.5</p> <p>The process is no longer fit for purpose. We consider the shortcomings highlighted by the Authority are largely occurring due to a lack of transparency in the switching process.</p> <p>Powerco supports a review of the distributor switching process. This review should consider having the process flow through the registry like the current trader switching process.</p>	Noted. Included in Issue 20

Submitter	Question	Submission	Authority response
Simply Energy	Issue 18, Q5. Why do you think this issue is occurring?		
Tenco	Issue 18, Q5. Why do you think this issue is occurring?	The registry and code was never intended for the number of embedded networks as we have today.	Noted
Trustpower	Issue 18, Q5. Why do you think this issue is occurring?		
Unison Networks	Issue 18, Q5. Why do you think this issue is occurring?		
Vector	Issue 18, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 18, Q5. Why do you think this issue is occurring?		
Issue 20: The Code prohibits backdating price category codes Q3. How material is this issue?			
Contact Energy	Issue 20, Q3. How material is this issue?	Medium impact	Noted, this has been transferred to the Code amendment omnibus

Submitter	Question	Submission	Authority response
Electric Kiwi	Issue 20, Q3. How material is this issue?	We believe the biggest issue with the inability to backdate price category codes is the impact on the customer. As noted in the issues paper, a customer may be with a trader for several months before it is identified that they should have been a low user. Being able to backdate a price category code will have great benefits the customer and provide a much better experience. As long as the distributor and the trader agree, we see no issue with backdating price category codes up to 4 months.	Noted, this has been transferred to the Code amendment omnibus
Flick Energy	Issue 20, Q3. How material is this issue?	It is essential to provide customers the choice to change/backdate their price category if they feel that they are being disadvantage through their current price code. The unavailability of this choice leaves customers feeling unsatisfied with their retailer.	Noted, this has been transferred to the Code amendment omnibus
Genesis Energy	Issue 20, Q3. How material is this issue?		
IntelliHub	Issue 20, Q3. How material is this issue?		
Meridian and Powershop	Issue 20, Q3. How material is this issue?	Can be to the customer if this results in a residential price category over a SME.	Noted
Mercury	Issue 20, Q3. How material is this issue?		
Metrix	Issue 20, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Northpower	Issue 20, Q3. How material is this issue?	<p><i>This issue has been reported for several years with most Distributors experiencing audit non-compliance due to back-dating price category codes.</i></p> <p><i>We are happy that the Electricity Authority has finally realised that the efficient and customer centric market requires that data such as the price category code needs to be back-dated for a limited period beyond the three day Code requirement.</i></p> <p><i>Northpower would support a Code change that would allow back dating of price category codes for up to 3 months or to the last trader switch date whichever is the shortest period.</i></p>	Noted, this has been transferred to the Code amendment omnibus
Nova Energy	Issue 20, Q3. How material is this issue?		
Orion Energy	Issue 20, Q3. How material is this issue?	<p><i>Specifically- Distributors must populate price category codes and no later than three business days after the distribution charge for the ICP takes effect. A distributor that agrees to backdate a change to a price category code must use a manual process to refund the customer. Updating means a breach of the Code.</i></p> <p>In our last audit we were 97% compliant on a sample of 1,279. In all cases where we were non-compliant customer service was at the heart of the backdating decision. The issue is only material because it causes a breach of the Code.</p>	Noted, this has been transferred to the Code amendment omnibus
Powerco	Issue 20, Q3. How material is this issue?	<p>Q.3</p> <p>The prohibition against Distributors backdating price category codes is resulting in outcomes that aren't in the best interest of consumers.</p> <p>We understand if a price category code is backdated for an ICP, the Trader responsible for that ICP faces the risk of being unable to</p>	Noted, this has been transferred to the Code amendment omnibus

Submitter	Question	Submission	Authority response
		<p>pass on this backdated charge to the customer.</p> <p>However, where the Distributor and Trader agree to backdating a price category code, this risk is removed. In these instances, it makes sense to allow backdating as it is good for the customer.</p> <p>Powerco supports a change to the code that allows backdating of price category codes where the backdating is agreed by both the Distributor and Trader.</p>	
Simply Energy	Issue 20, Q3. How material is this issue?		
Tenco	Issue 20, Q3. How material is this issue?		
Trustpower	Issue 20, Q3. How material is this issue?		
Unison Networks	Issue 20, Q3. How material is this issue?	<p>The issue of the Code preventing backdating price category codes is material as it results in some consumers being charged too much or not enough as they are on the wrong price category code (for example low user fixed charge regulations have not been applied when the customer is indeed eligible). Distributors are currently prevented by the Code from backdating these price category codes. However, some distributors have chosen to backdate these price category codes (in agreement with retailers) to ensure that the Registry holds the most accurate information. This ultimately results in non-compliance with the Code when Distributors are audited.</p>	Noted, this has been transferred to the Code amendment omnibus
Vector	Issue 20, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Wellington Electricity	Issue 20, Q3. How material is this issue?		
Issue 20: The Code prohibits backdating price category codes Q4. Is this issue getting worse?			
Contact Energy	Issue 20, Q4. Is this issue getting worse?	Not necessarily getting worse, however medium in volume	Noted
Electric Kiwi	Issue 20, Q4. Is this issue getting worse?	We believe the biggest issue with the inability to backdate price category codes is the impact on the customer. As noted in the issues paper, a customer may be with a trader for several months before it is identified that they should have been a low user. Being able to backdate a price category code will have great benefits the customer and provide a much better experience. As long as the distributor and the trader agree, we see no issue with backdating price category codes up to 4 months.	Noted, this has been transferred to the Code amendment omnibus
Flick Energy	Issue 20, Q4. Is this issue getting worse?	Yes, as awareness increases amongst customers around low/standard price category, there is an increase in dissatisfaction around the inability to change/backdate price category.	Noted, this has been transferred to the Code amendment omnibus
Genesis Energy	Issue 20, Q4. Is this issue getting worse?		
IntelliHub	Issue 20, Q4. Is this issue getting worse?		
Mercury	Issue 20, Q4. Is this		

Submitter	Question	Submission	Authority response
	issue getting worse?		
Meridian and Powershop	Issue 20, Q4. Is this issue getting worse?	Unsure.	Noted
Northpower	Issue 20, Q4. Is this issue getting worse?	<i>As the roll out of advanced meters occurs with the resulting changes or correction to register content/available hours on mainly controlled registers we seem to be getting more requests to back date price category codes.</i>	Noted
Nova Energy	Issue 20, Q4. Is this issue getting worse?		
Orion Energy	Issue 20, Q4. Is this issue getting worse?	This issue can get worse as a result of technology changes or a downturn/upturn in the economy.	Noted
Powerco	Issue 20, Q4. Is this issue getting worse?		
Simply Energy	Issue 20, Q4. Is this issue getting worse?		
Tenco	Issue 20, Q4. Is this issue getting worse?		
Trustpower	Issue 20, Q4. Is this issue getting worse?		
Unison Networks	Issue 20, Q4. Is this issue getting worse?	This issue has been present for a number of years – Unison has previously raised it as a concern in our audits and then requested a Code change with the Authority in September 2015. A growing awareness of historic and/or recurring data integrity	Noted, this has been transferred to the Code amendment omnibus

Submitter	Question	Submission	Authority response
		<p>issues relating to points of supply and meter installations associated with AMI deployments, combined with improvements in asset and customer information management systems has meant that long-standing issues are coming to light that at times require backdating to provide the most accurate information and redress historical charges.</p> <p>At the same time, growing use of third party contractors and agents has resulted in greater scope for delay in information updating or inaccuracy. These delays should be reduced as far as possible through standardising processes (e.g. the Authority's Livening and Energisation Guidelines) as well as use of mobile technology to enhance timeliness and accuracy. However, delays will still occur from time to time, and backdating allows accurate information to be provided.</p>	
Vector	Issue 20, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 20, Q4. Is this issue getting worse?		
Issue 20: The Code prohibits backdating price category codes Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 20, Q5. Why do you think this issue is occurring?	<p>Contact agrees with the problems identified under Issue 20.</p> <p>Contact also notes the issues paper only identifies one scenario for why a price category may need to be backdated (backdated I CP switching), however there are multiple other reasons as to why a price category may need to be backdated. This is a common occurrence in day to day operations, i.e. Customer end use changes that may impact the network price category if the</p>	Noted, this has been transferred to the Code amendment omnibus

Submitter	Question	Submission	Authority response
		<p>Distributor differentiates between business and residential rates. For example there are sometimes delays moving builders temporary supplies to new connections which affects the price category. Meter configuration errors can occur which are often directly reflected in Distributors price categories.</p> <p>The key point is that the Code needs to be flexible enough to enable backdating of pricing changes where the outcome is in the best Interests of the customer and ensures accuracy of registry events. In a large number of cases, Distributors agree that the pricing category should be backdated, however will not do so to avoid being technically in breach of the Code. We recommend that the Code should be amended to enable backdating of price categories where both the Distributor and Trader agree to the proposed change.</p>	
Electric Kiwi	Issue 20, Q5. Why do you think this issue is occurring?	We believe the biggest issue with the inability to backdate price category codes is the impact on the customer. As noted in the issues paper, a customer may be with a trader for several months before it is identified that they should have been a low user. Being able to backdate a price category code will have great benefits the customer and provide a much better experience. As long as the distributor and the trader agree, we see no issue with backdating price category codes up to 4 months.	Noted, this has been transferred to the Code amendment omnibus
Flick Energy	Issue 20, Q5. Why do you think this issue is occurring?	This issue is occurring as there is no provision in the code for the networks to back date price category codes. Networks will breach if they backdate a price cat.	Noted, this has been transferred to the Code amendment omnibus
Genesis Energy	Issue 20, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
IntelliHub	Issue 20, Q5. Why do you think this issue is occurring?		
Mercury	Issue 20, Q5. Why do you think this issue is occurring?		
Meridian and Powershop	Issue 20, Q5. Why do you think this issue is occurring?	Unsure. Potentially this may be a bigger issue in some networks where we haven't in the past or currently don't have a high number of ICPs though.	Noted
Metrix	Issue 20, Q4. Is this issue getting worse?		
Metrix	Issue 20, Q5. Why do you think this issue is occurring?		
Northpower	Issue 20, Q5. Why do you think this issue is occurring?	<p><i>Traders who switch ICPs, usually with a new customer sign in, find that the current customer requirements differ from those of the previous customer (e.g. lower user/normal user price category).</i></p> <p><i>We are also finding cases where the installation of advanced metering has resulted in incorrect register content codes/available hours being entered into the Registry. The drawn out correction process involving the trader, MEP, and Distributor can involve requests to backdate price category codes on the Registry.</i></p>	Noted, this has been transferred to the Code amendment omnibus

Submitter	Question	Submission	Authority response
Nova Energy	Issue 20, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 20, Q5. Why do you think this issue is occurring?	<p>Examples of when this issue occurs include;</p> <ul style="list-style-type: none"> • A business customer's consumption reduces gradually over a period of time and they vacate the premises without notice. Especially difficult to identify where pricing arrangements are predominately fixed. • Farming practices change- as in the case of conversion from pumped to gravity feed/run-of-river irrigation. <p>Both these situations can result in a change of pricing structure from moving below or above a pricing threshold and a backdating occurrence.</p> <p>Manual refunding of customers is in the customer's best interest and is commonly conducted via a wash-up process between EDB and Retailer.</p>	Noted, this has been transferred to the Code amendment omnibus
Powerco	Issue 20, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 20, Q5. Why do you think this issue is occurring?		
Tenco	Issue 20, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Trustpower	Issue 20, Q5. Why do you think this issue is occurring?		
Unison Networks	Issue 20, Q5. Why do you think this issue is occurring?	<p>There are a number reasons, as indicated above in response to (b). In addition, incorrect information can be entered into the Registry by the retailer or distributor, or incorrect information provided by the customer.</p> <p>The prohibition of backdating price category codes is not just an issue for switching, but also one of general ICP information management. Unison supports the Authority amending the Code to allow for backdated price category codes, providing that there is agreement by both the Trader and the Distributor. We strongly urge the Authority to progress this Code amendment as a 'quick win' that can be implemented in a short amount of time. We have previously corresponded with the Authority on the suggested Code change wording and would support this being included in the next Code Amendment Omnibus.</p>	Noted, this has been transferred to the Code amendment omnibus
Vector	Issue 20, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 20, Q5. Why do you think this issue is occurring?		
Issue 21: The provision of initial metering data to a trader is not always timely Q3. How material is this issue?			
Contact	Issue 21, Q3. How	Medium impact	Noted

Submitter	Question	Submission	Authority response
Energy	material is this issue?		
Electric Kiwi	Issue 21, Q3. How material is this issue?	<p>This issue highlights an inconsistency in the processes that the trader and the MEP need to follow in order to be compliant with the code. While the MEP has up to 10 business days to provide a start read, the trader only has 5 business days to send a replacement read. Based on previous analysis, this puts us in a potential breach situation about 7.5% of the time. This is the percentage of switches where we do not have actual reads from the MEP within 5 business days.</p> <p>We can see a few solutions to this issue:</p> <p>1) MEP to be notified of NTs and ANs, not only CSs. This will help them prepare their systems for a change in trader.</p> <p>2) MEP to provide start read to gaining trader within 5 business days, not 10</p>	<p>Noted. Included in Issue 23</p> <p>Noted. Included in Issue 3 and Issue 21</p>
Flick Energy	Issue 21, Q3. How material is this issue?	The delay in metering data delays the Read replacement process which disadvantages the customer. This also delays customer billing and results in an adverse customer experience	Noted. Included in Issue 3 and Issue 21
Genesis Energy	Issue 21, Q3. How material is this issue?		
IntelliHub	Issue 21, Q3. How material is this issue?		
Mercury	Issue 21, Q3. How material is this issue?		
Meridian and	Issue 21, Q3. How	Unsure. It does create delays in billing, initiating the read	Noted

Submitter	Question	Submission	Authority response
Powershop	material is this issue?	replacement process and giving customer visibility of daily data through web portals, however.	
Metrix	Issue 21, Q3. How material is this issue?	<i>Q3. Medium</i>	Noted
Northpower	Issue 21, Q3. How material is this issue?		
Nova Energy	Issue 21, Q3. How material is this issue?		
Orion Energy	Issue 21, Q3. How material is this issue?		
Powerco	Issue 21, Q3. How material is this issue?		
Simply Energy	Issue 21, Q3. How material is this issue?		
Tenco	Issue 21, Q3. How material is this issue?		
Trustpower	Issue 21, Q3. How material is this issue?		
Unison Networks	Issue 21, Q3. How material is this issue?		
Vector	Issue 21, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Wellington Electricity	Issue 21, Q3. How material is this issue?		
Issue 21: The provision of initial metering data to a trader is not always timely Q4. Is this issue getting worse?			
Contact Energy	Issue 21, Q4. Is this issue getting worse?	Not necessarily getting worse, however medium in volume	Noted
Electric Kiwi	Issue 21, Q4. Is this issue getting worse?	<p>This issue highlights an inconsistency in the processes that the trader and the MEP need to follow in order to be compliant with the code. While the MEP has up to 10 business days to provide a start read, the trader only has 5 business days to send a replacement read. Based on previous analysis, this puts us in a potential breach situation about 7.5% of the time. This is the percentage of switches where we do not have actual reads from the MEP within 5 business days.</p> <p>We can see a few solutions to this issue:</p> <p>1) MEP to be notified of NTs and ANs, not only CSs. This will help them prepare their systems for a change in trader.</p> <p>2) MEP to provide start read to gaining trader within 5 business days, not 10</p>	Noted. Refer to response above
Flick Energy	Issue 21, Q4. Is this issue getting worse?	Yes	Noted
Genesis Energy	Issue 21, Q4. Is this issue getting worse?		
IntelliHub	Issue 21, Q4. Is this		

Submitter	Question	Submission	Authority response
	issue getting worse?		
Mercury	Issue 21, Q4. Is this issue getting worse?		
Meridian and Powershop	Issue 21, Q4. Is this issue getting worse?	Unsure.	Noted
Metrix	Issue 21, Q4. Is this issue getting worse?	<i>Q4. Not visible, however this impacts a small percentage of ICPs during switching.</i>	Noted
Northpower	Issue 21, Q4. Is this issue getting worse?		
Nova Energy	Issue 21, Q4. Is this issue getting worse?		
Orion Energy	Issue 21, Q4. Is this issue getting worse?		
Powerco	Issue 21, Q4. Is this issue getting worse?		
Simply Energy	Issue 21, Q4. Is this issue getting worse?		
Tenco	Issue 21, Q4. Is this issue getting worse?		
Trustpower	Issue 21, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Unison Networks	Issue 21, Q4. Is this issue getting worse?		
Vector	Issue 21, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 21, Q4. Is this issue getting worse?		
Issue 21: The provision of initial metering data to a trader is not always timely Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 21, Q5. Why do you think this issue is occurring?	Contact understands the challenges behind the requirements and timeframes for MEPs providing data to the registry, however automated systems should be in place to avoid any issues. Adding MEPs to the switching request (NT file) process is potentially a good indicator, however MEPs can't act on this and any system enhancement may be redundant or result in additional system costs to deal with a potential switch withdrawal. Contact recommends the best option is for MEPs to use the Notification file as this is confirmation that the switch has occurred (or switch withdrawal).	Noted. Included in Issue 23
Electric Kiwi	Issue 21, Q5. Why do you think this issue is occurring?	This issue highlights an inconsistency in the processes that the trader and the MEP need to follow in order to be compliant with the code. While the MEP has up to 10 business days to provide a start read, the trader only has 5 business days to send a replacement read. Based on previous analysis, this puts us in a potential breach situation about 7.5% of the time. This is the percentage of switches where we do not have actual reads from the MEP within 5 business days.	Noted. Refer to response above

Submitter	Question	Submission	Authority response
		<p>We can see a few solutions to this issue:</p> <p>1) MEP to be notified of NTs and ANs, not only CSs. This will help them prepare their systems for a change in trader.</p> <p>2) MEP to provide start read to gaining trader within 5 business days, not 10</p>	
Flick Energy	Issue 21, Q5. Why do you think this issue is occurring?	<p>Non-alignment of timeframes between the RR process and AMI data request in the code which leads to this issue.</p> <p>There is also no visibility to the MEP on a switch in progress. The MEP's could prepare themselves if they are aware of a switch in progress.</p>	Noted. Included in Issue 23
Genesis Energy	Issue 21, Q5. Why do you think this issue is occurring?		
IntelliHub	Issue 21, Q5. Why do you think this issue is occurring?		
Mercury	Issue 21, Q5. Why do you think this issue is occurring?		
Meridian and Powershop	Issue 21, Q5. Why do you think this issue is occurring?	Unsure.	
Metrix	Issue 21, Q5. Why do you think this issue is	<i>Q5. For AMI metered sites, providing raw meter data within 10 business days should be achievable from the day the MEP is</i>	Noted. Included in Issue 23

Submitter	Question	Submission	Authority response
	occurring?	<i>notified by the Registry. Issues can be caused in backdated switches, as mentioned in “shortcoming 3” or when an AMI meter is not communicating with the MEP’s back office system. Ideally when a Trader switch occurs, the MEP should provide backdated meter data from the ICP switch date if this is within a reasonable timeframe (e.g. <15 days).</i>	
Northpower	Issue 21, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 21, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 21, Q5. Why do you think this issue is occurring?		
Powerco	Issue 21, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 21, Q5. Why do you think this issue is occurring?		
Tenco	Issue 21, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 21, Q5. Why do		

Submitter	Question	Submission	Authority response
	you think this issue is occurring?		
Unison Networks	Issue 21, Q5. Why do you think this issue is occurring?		
Vector	Issue 21, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 21, Q5. Why do you think this issue is occurring?		
Issue 22: Meter reading file formats are not standardised			
Q3. How material is this issue?			
Contact Energy	Issue 22, Q3. How material is this issue?	Medium impact	Noted
Electric Kiwi	Issue 22, Q3. How material is this issue?	We believe that formats should be standardized by default, however, it can be up to the trader and the MEP to negotiate an alternative if they both agree to it.	Noted. Included in Issue 24
Flick Energy	Issue 22, Q3. How material is this issue?	Non-standardised meter reading file formats hinder innovation and efficient running of the backoffice processes. It is also detrimental to promoting efficiency and competition in the	Noted. Included in Issue 24

Submitter	Question	Submission	Authority response
		market. Generally, the lack of efficient standardised processes across the industry is a barrier to entry	
Genesis Energy	Issue 22, Q3. How material is this issue?		
IntelliHub	Issue 22, Q3. How material is this issue?		
Mercury	Issue 22, Q3. How material is this issue?		
Meridian and Powershop	Issue 22, Q3. How material is this issue?	Unsure.	Noted
Metrix	Issue 22, Q3. How material is this issue?	<i>Q3. Potentially High</i>	Noted
Northpower	Issue 22, Q3. How material is this issue?		
Nova Energy	Issue 22, Q3. How material is this issue?		
Orion Energy	Issue 22, Q3. How material is this issue?		
Powerco	Issue 22, Q3. How material is this issue?		
Simply Energy	Issue 22, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Tenco	Issue 22, Q3. How material is this issue?		
Trustpower	Issue 22, Q3. How material is this issue?		
Unison Networks	Issue 22, Q3. How material is this issue?		
Vector	Issue 22, Q3. How material is this issue?		
Wellington Electricity	Issue 22, Q3. How material is this issue?		
Issue 22: Meter reading file formats are not standardised			
Q4. Is this issue getting worse?			
Contact Energy	Issue 22, Q4. Is this issue getting worse?	Not necessarily getting worse, however medium in volume	Noted
Electric Kiwi	Issue 22, Q4. Is this issue getting worse?	We believe that formats should be standardized by default, however, it can be up to the trader and the MEP to negotiate an alternative if they both agree to it.	Noted. Refer to response above
Flick Energy	Issue 22, Q4. Is this issue getting worse?	Yes, with more MEP's entering the electricity market, this issue is getting worse.	Noted. Included in Issue 24

Submitter	Question	Submission	Authority response
Genesis Energy	Issue 22, Q4. Is this issue getting worse?		
IntelliHub	Issue 22, Q4. Is this issue getting worse?		
Mercury	Issue 22, Q4. Is this issue getting worse?		
Meridian and Powershop	Issue 22, Q4. Is this issue getting worse?	Unsure.	Noted
Metrix	Issue 22, Q4. Is this issue getting worse?	<i>Q4. As more Traders and MEPs enter the market then this could continue to worsen due to increased variation between participants.</i>	Noted. Included in Issue 24
Northpower	Issue 22, Q4. Is this issue getting worse?		
Nova Energy	Issue 22, Q4. Is this issue getting worse?		
Orion Energy	Issue 22, Q4. Is this issue getting worse?		
Powerco	Issue 22, Q4. Is this issue getting worse?		
Simply Energy	Issue 22, Q4. Is this issue getting worse?		
Tenco	Issue 22, Q4. Is this		

Submitter	Question	Submission	Authority response
	issue getting worse?		
Trustpower	Issue 22, Q4. Is this issue getting worse?		
Unison Networks	Issue 22, Q4. Is this issue getting worse?		
Vector	Issue 22, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 22, Q4. Is this issue getting worse?		
Issue 22: Meter reading file formats are not standardised Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 22, Q5. Why do you think this issue is occurring?	Contact agrees with the problems identified under Issue 22 and the industry should consider standardising the two primary interfaces between MEPs and Traders (HHR and daily read files).	Noted. Included in Issue 24
Electric Kiwi	Issue 22, Q5. Why do you think this issue is occurring?	We believe that formats should be standardized by default, however, it can be up to the trader and the MEP to negotiate an alternative if they both agree to it.	Noted. Refer to response above
Flick Energy	Issue 22, Q5. Why do you think this issue is	Due to Code not being regulated the MEP's are not obligated to use the same file format.	Noted. Included in Issue 24

Submitter	Question	Submission	Authority response
	occurring?		
Genesis Energy	Issue 22, Q5. Why do you think this issue is occurring?		
IntelliHub	Issue 22, Q5. Why do you think this issue is occurring?		
Mercury	Issue 22, Q5. Why do you think this issue is occurring?		
Meridian and Powershop	Issue 22, Q5. Why do you think this issue is occurring?	Unsure.	Noted
Metrix	Issue 22, Q5. Why do you think this issue is occurring?	<i>Q5. There has never been a standardised format. Meter reading file formats contain largely similar fields, so there is a certain standardisation based on what Trader systems can process.</i>	Noted
Northpower	Issue 22, Q5. Why do you think this issue is occurring?		
Nova Energy	Issue 22, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 22, Q5. Why do you think this issue is		

Submitter	Question	Submission	Authority response
	occurring?		
Powerco	Issue 22, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 22, Q5. Why do you think this issue is occurring?		
Tenco	Issue 22, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 22, Q5. Why do you think this issue is occurring?		
Unison Networks	Issue 22, Q5. Why do you think this issue is occurring?		
Vector	Issue 22, Q5. Why do you think this issue is occurring?		
Wellington Electricity	Issue 22, Q5. Why do you think this issue is occurring?		
Issue 23: The gaining and losing MEPs cannot use the same MEP event date for an MEP switch Q3. How material is this issue?			

Submitter	Question	Submission	Authority response
Contact Energy	Issue 23, Q3. How material is this issue?	Low impact	Noted
Electric Kiwi	Issue 23, Q3. How material is this issue?	<p>We believe this is an overall issue in the registry, and that there should be the ability for the MEPs to use the same event date. When they do not use the same date, our consumption records do not align with the registry. For example, if a meter is changes on 1 November by MEP X, and they removed MEP Y's meter, then we would have usage for each meter on the same day. Currently, only MEP X would by the correct MEP in the registry, and this would not align with our system. Our preference is that a timestamp would also be included if the same event date is being used, and that this timestamp would align with a half hourly interval.</p> <p>We also think it would be best that the MEPs consistently use the removal date in the registry instead of solely relying on providing paperwork back to the trader (which causes considerable manual operational work).</p>	<p>Noted. This is included in Issue 25</p> <p>Noted. This is included in Issue 27</p>
Flick Energy	Issue 23, Q3. How material is this issue?	It is vital for both the losing and gaining MEP to be able to update registry for the same event date so that reconciliation is effected correctly through submission.	Noted. This is included in Issue 25
Genesis Energy	Issue 23, Q3. How material is this issue?		
IntelliHub	Issue 23, Q3. How material is this issue?		
Mercury	Issue 23, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Meridian and Powershop	Issue 23, Q3. How material is this issue?	Unsure.	Noted
Metrix	Issue 23, Q3. How material is this issue?	Q3. <i>Medium</i>	Noted
Northpower	Issue 23, Q3. How material is this issue?	<p><i>This issue has been reported for several years and is the cause of a significant number of emails between Traders and Northpower as the losing MEP. It is unfortunate that the Authority has taken 5 years to start consultation on this issue due to the inefficiencies that have been caused in the industry.</i></p> <p><i>Northpower has also experienced problems with the issues with late or non-population of meter data in the Registry by the gaining MEP (6.17 in the consultation document) with the resulting liability under the Code as outlined in 6.22 of the consultation document. This issue has also been the subject of discussion with the Authority several times since the Part 10 go-live.</i></p>	<p>Noted</p> <p>Noted. This is included in Issue 28</p>
Nova Energy	Issue 23, Q3. How material is this issue?		
Orion Energy	Issue 23, Q3. How material is this issue?		
Powerco	Issue 23, Q3. How material is this issue?		
Simply Energy	Issue 23, Q3. How material is this issue?		

Submitter	Question	Submission	Authority response
Tenco	Issue 23, Q3. How material is this issue?		
Trustpower	Issue 23, Q3. How material is this issue?		
Unison Networks	Issue 23, Q3. How material is this issue?		
Vector	Issue 23, Q3. How material is this issue?		
Wellington Electricity	Issue 23, Q3. How material is this issue?		
Issue 23: The gaining and losing MEPs cannot use the same MEP event date for an MEP switch Q4. Is this issue getting worse?			
Contact Energy	Issue 23, Q4. Is this issue getting worse?	Not necessarily getting worse, however medium in volume	Noted
Electric Kiwi	Issue 23, Q4. Is this issue getting worse?	<p>We believe this is an overall issue in the registry, and that there should be the ability for the MEPs to use the same event date. When they do not use the same date, our consumption records do not align with the registry. For example, if a meter is changes on 1 November by MEP X, and they removed MEP Y's meter, then we would have usage for each meter on the same day. Currently, only MEP X would by the correct MEP in the registry, and this would not align with our system. Our preference is that a timestamp would also be included if the same event date is being used, and that this timestamp would align with a half hourly</p>	Noted. Refer to response above

Submitter	Question	Submission	Authority response
		interval. We also think it would be best that the MEPs consistently use the removal date in the registry instead of solely relying on providing paperwork back to the trader (which causes considerable manual operational work).	
Flick Energy	Issue 23, Q4. Is this issue getting worse?	Yes, with increase meter change activities.	Noted
Genesis Energy	Issue 23, Q4. Is this issue getting worse?		
IntelliHub	Issue 23, Q4. Is this issue getting worse?		
Mercury	Issue 23, Q4. Is this issue getting worse?		
Meridian and Powershop	Issue 23, Q4. Is this issue getting worse?	Unsure.	Noted
Metrix	Issue 23, Q4. Is this issue getting worse?	<i>Q4. Yes, the more MEPs providing HHR services will want to update their removal details on the Registry as per the date of the event change.</i>	Noted
Northpower	Issue 23, Q4. Is this issue getting worse?	<i>In Northpower's case the impact of this issue is reducing as the number of Northpower owned legacy meters now replaced with advanced meters owned by other MEPs is quite significant.</i>	Noted
Nova Energy	Issue 23, Q4. Is this issue getting worse?		

Submitter	Question	Submission	Authority response
Orion Energy	Issue 23, Q4. Is this issue getting worse?		
Powerco	Issue 23, Q4. Is this issue getting worse?		
Simply Energy	Issue 23, Q4. Is this issue getting worse?		
Tenco	Issue 23, Q4. Is this issue getting worse?		
Trustpower	Issue 23, Q4. Is this issue getting worse?		
Unison Networks	Issue 23, Q4. Is this issue getting worse?		
Vector	Issue 23, Q4. Is this issue getting worse?		
Wellington Electricity	Issue 23, Q4. Is this issue getting worse?		
Issue 23: The gaining and losing MEPs cannot use the same MEP event date for an MEP switch Q5. Why do you think this issue is occurring?			
Contact Energy	Issue 23, Q5. Why do you think this issue is occurring?	Contact agrees with the problems identified under Issue 23, however don't see any easy or practical solution. Enabling same date events (or time bases events for the same day) in the registry will create a much bigger development piece for both the	Noted. This is included in Issue 25

Submitter	Question	Submission	Authority response
		registry service provider and all participants. Contact considers a practical approach should be introduced to ensure complexity and costs are minimised, given this is a relatively minor issue. This could be simply mitigated by a Code requirement stating that removal events should be the day prior to the event date, enabling the new meter to be installed on the actual event date.	
Electric Kiwi	Issue 23, Q5. Why do you think this issue is occurring?	<p>We believe this is an overall issue in the registry, and that there should be the ability for the MEPs to use the same event date. When they do not use the same date, our consumption records do not align with the registry. For example, if a meter is changes on 1 November by MEP X, and they removed MEP Y's meter, then we would have usage for each meter on the same day. Currently, only MEP X would be the correct MEP in the registry, and this would not align with our system. Our preference is that a timestamp would also be included if the same event date is being used, and that this timestamp would align with a half hourly interval.</p> <p>We also think it would be best that the MEPs consistently use the removal date in the registry instead of solely relying on providing paperwork back to the trader (which causes considerable manual operational work).</p>	Noted. Refer to response above
Flick Energy	Issue 23, Q5. Why do you think this issue is occurring?	This issue is occurring due to registry's inability to record two events for the same date.	Noted. This is included in Issue 25
Genesis Energy	Issue 23, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
IntelliHub	Issue 23, Q5. Why do you think this issue is occurring?		
Mercury	Issue 23, Q5. Why do you think this issue is occurring?		
Meridian and Powershop	Issue 23, Q5. Why do you think this issue is occurring?	Unsure.	Noted
Metrix	Issue 23, Q5. Why do you think this issue is occurring?	<i>Q5. The Registry event system isn't very flexible. There is only one event possible for each date, and so only one MEP can update the data for each date. MEPs are also resistant to reversing removal details in the Registry, as this is not something that they see benefit in doing. If the losing MEP and the gaining MEP can make separate updates on the same event date, which are easily identifiable based on the previous metering event and the new proposed MEP; then manual reversal activity could be avoided.</i>	Noted. This is included in Issue 25
Northpower	Issue 23, Q5. Why do you think this issue is occurring?	<i>This issue is occurring due to the design of the Registry to incorporate the 2013 Part 10 changes which only allow one event per day for a Registry event (6.16 in the consultation document).</i> <i>The result, in addition to inefficiencies and costs, are ICPs that now have incorrect initial metering event dates as the gaining MEP has not been able to update their meter data into the Registry on the actual installation date.</i>	Noted. This is included in Issue 25

Submitter	Question	Submission	Authority response
Nova Energy	Issue 23, Q5. Why do you think this issue is occurring?		
Orion Energy	Issue 23, Q5. Why do you think this issue is occurring?		
Powerco	Issue 23, Q5. Why do you think this issue is occurring?		
Simply Energy	Issue 23, Q5. Why do you think this issue is occurring?		
Tenco	Issue 23, Q5. Why do you think this issue is occurring?		
Trustpower	Issue 23, Q5. Why do you think this issue is occurring?		
Unison Networks	Issue 23, Q5. Why do you think this issue is occurring?		
Vector	Issue 23, Q5. Why do you think this issue is occurring?		

Submitter	Question	Submission	Authority response
Wellington Electricity	Issue 23, Q5. Why do you think this issue is occurring?		

