

## Appendix A Format for submissions

A.1 Please complete the table below for each proposed amendment on which you wish to submit. Please include the reference number from the first row of the table in Appendix B).

Reference	2019 – 01 Revised timeframe for distributors to change price category code information in the registry
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Yes, particularly in problem 1. We believe this solution of allowing backdated price changes is in the best interest of the consumer.	
<b>Question 3: Do you have any comments on the Authority's proposed Code drafting?</b>	
No	
<b>Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?</b>	
Yes	

<b>Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?</b>
Yes
<b>Question 6: Do you agree the proposed amendment is preferable to the other options? If not, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.</b>
Yes

Reference	2019 – 11 Clarifying when obligations linked to clause 22 of Schedule 11.3 begin.
<b>Question 1: Do you agree with the Authority's problem definition? If not, why not?</b>	
Yes	
<b>Question 2: Do you agree with the Authority's proposed solution? If not, why not?</b>	
Not completely, see question 3 for more detail. We agree with proposed solutions for all clauses <b>except</b> 11.15AB Switch saving protection.	

**Question 3: Do you have any comments on the Authority's proposed Code drafting?**

Yes – we believe that clause **11.15AB Switch saving protection** requires further changes to clarify the time period in which switch save protection applies. Saves and winbacks should be banned, but while the programme is still in place, if switch save protection ends on the event/effective date and not the input date of the switch CS, then it allows a loophole for losing retailers to save customers who have backdated switches.

See highlighted in yellow below.

(5) The period:

(a) starts on the ~~day~~ date on which the registry manager, under clause 22(a) of Schedule 11.3, makes the trader receives written notice of the switch request under clause 22(a) of Schedule 11.3 available to the trader; and

(b) ends on the ~~event date for the switch~~ date and time on which the registry manager, under clause 22(d), makes written notice of switch completion information available to the gaining trader.

**Question 4: Do you agree with the objectives of the proposed amendment? If not, why not?**

Yes

**Question 5: Do you agree the benefits of the proposed amendment outweigh its costs? If not, why not?**

Yes

**Question 6: Do you agree the proposed amendment is preferable to the other options? If not, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.**

Yes