

22 December 2016

Mr Ed Chan

Director
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

**Energy Networks Australia submission to the AEMC's Draft Rule Determination:
*Improving the Accuracy of Customer Transfers***

Dear Mr Chan,

Energy Networks Australia welcomes the opportunity to make a submission to the Australian Energy Market Commission (AEMC) in response to the "*Improving the accuracy of customer transfers*" draft rule determination published by the AEMC on 27 October 2016.

Energy Networks Australia is the national industry association representing the businesses operating Australia's electricity transmission and distribution and gas distribution networks. Member businesses provide energy to virtually every household and business in Australia.

Energy Networks Australia supports the part of the preferred rule change that improves the resolution of customer transfers that occur without the explicit consent of the customer, and agrees that this will assist in improving customer confidence in the transfer process and support customers exercising their choice of retailers.

Energy Networks Australia also supports the AEMC's decision not to make a draft rule to introduce an address standard. Energy Networks Australia notes that:

- Erroneous transfers due to address mismatches are only a small subset of the 2.2 per cent of erroneous transfers that occur.
- A number of Distribution Network Service Providers already have robust processes to manage address data.
- Transfer times and transfer accuracy are already improving.
- Introduction of an address standard is unlikely to significantly reduce customer transfer times and errors, since a substantial number of these errors result because a customer's understanding of their address may be different from the official rateable address of the property, or because the customer chooses to use a "vanity" address.
- AEMO's proposal, to undertake a centrally coordinated data cleanse of the data in the electricity market database, is likely to be more efficient than an incrementally applied address standard.

Energy Networks Australia therefore welcomes the AEMC's decision to proceed with a preferable rule that does not introduce a customer address standard. However, it is essential that AEMO consult with all affected market participants before progressing a data cleanse of address data and only progress such a change where the benefits exceed the costs. Furthermore, Energy Networks Australia recognises that the transition to metering competition and the implementation of the new/revised

Retail Market Procedures is taking considerable resource time for all market participants. If AEMO were to proceed with the proposed data cleanse, it should not proceed until after the implementation of metering competition.

If further information is sought on this matter, please contact Mr Peter Cole, Director, Future Networks, on 02 6272 1511 or by email on pcole@energynetworks.com.au.

Yours sincerely,



John Bradley
Chief Executive Officer

