

8 June 2016



Mr John Pierce
Chairman
Australian Energy Market Commission
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Sydney NSW 2000

Office of the Chief
Executive Officer

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Dear Mr Pierce

John,

National Electricity Amendment (improving accuracy of customer transfers) Rule 2016

Ausgrid welcomes the opportunity to provide a submission on the AEMC consultation paper, National Electricity Amendment (improving accuracy of customer transfers) Rule 2016. In general we support the standardisation of information maintained in market systems to allow the efficient and timely transfer of customers between electricity retailers.

Accurate address data and an effective address management system are important to distribution businesses like Ausgrid. Ausgrid has invested significantly in address management and uses existing industry address standards, such as the Australia Post address standard and the Geo-coded National Address File, to ensure the integrity of our data. Further, the NSW distribution industry is currently developing a supplementary system, the Comprehensive Property Address System, which aims to address data limitations in relation to new sub divisions and has the potential to be adapted to provide a national solution.

Ausgrid does not support the development of an additional, energy specific, standard for address data. Rather we recommend that the AEMC direct AEMO to investigate adopting existing industry standards rather than developing an energy specific standard for addresses as has been recommended in the rule change consultation paper.

We would welcome the opportunity to present our methodology for maintaining the accuracy of our address data. If, as recommended in the consultation paper, another standard was introduced there would be a significant cost impact for consumers with no corresponding benefit.

While Ausgrid does not support the development of an additional, energy specific, address standard we do support AEMO's proposal for the use of an incremental approach to implementing an address standard. In this approach the standard would be applied for all new connections. Users of the Market Settlement and Transfer Solution (MSATS) system would only be required to apply it when they are amending existing data. There is insufficient evidence to suggest that the perceived level of MSATS address data inaccuracy would warrant the significant effort and costs involved in a full data cleanse.

If you have any queries or wish to discuss further please contact Murray Chandler, Manager Network Strategy at Ausgrid on (02) 9249 7210 or via email at murray.chandler@ausgrid.com.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Trevor Armstrong', with a stylized flourish at the end.

TREVOR ARMSTRONG
Acting Chief Executive Officer