

19 December 2016

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Mr Pierce

**RE: AEMC DRAFT DETERMINATION – NATIONAL ELECTRICITY AMENDMENT
(IMPROVING THE ACCURACY OF CUSTOMER TRANSFERS) RULE 2016
(REFERENCE ERC0195)**

Endeavour Energy welcomes the opportunity to provide a submission to the AEMC's draft determination regarding the National Energy Retail Amendment (Improving the accuracy of customer transfers) Draft Rule.

The Transfer Accuracy Rule Change Request, submitted by the Council of Australian Governments (COAG), sought to improve the process for addressing customer transfers made in error. It acknowledged that it can often take considerable time and effort on the part of a customer who has been erroneously transferred to ensure that retailers take the necessary steps to resolve the situation.

We support the AEMC's decision to draft a more preferable rule that is expanded to include all transfers made without informed and explicit consent, rather than only those made in error. This broader approach combined with an explicit outline of the responsibilities required of each retailer in the resolution process will likely enhance consumer confidence in the retail transfer process.

In addition, we support the AEMC's decision not to proceed with an address standard. We share the AEMC's view that the potential benefits of adopting an address standard is likely to be outweighed by the additional costs associated with compliance to the standard and would also impose a disproportionate regulatory and administrative burden on market participants. We agree with the AEMC's assertions that adopting an address standard:

- may require several market participants to incur increased costs that would likely be passed on to consumers;
- is not likely, in the absence of clear evidence to suggest otherwise, to lead to a material reduction in transfer times and errors;
- may not be warranted given that recent data indicates a reduction in transfer times and errors is currently being observed in the retail transfer market;
- would be significantly more expensive and less timely than the AEMO's proposed data cleanse.

If you have any queries or wish to discuss this matter further please contact Jon Hocking, Manager of Network Regulation at Endeavour Energy on (02) 9583 4386 or alternatively via email at jon.hocking@endeavourenergy.com.au.

Yours sincerely



Rod Howard

Acting Chief Executive Officer