



21 December 2016

Ms Lily Mitchell
Australian Energy Market Commission
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Dear Ms Mitchell

***Re: Submission on Draft Rule Determination: Improving the Accuracy of Customer Transfers
(Ref ERC0195)***

Ausgrid welcomes the opportunity to provide comments in response to the AEMC's Draft Rule Determination on improving the accuracy of customer transfers.

Ausgrid supports the AEMC's Draft Rule Determination, which has 2 components:

- 1) A Draft Rule to improve the process for resolving customer transfers that occur without customer consent; and
- 2) A proposal not to make the Draft Rule requested by the COAG Energy Council to introduce an address standard.

Ausgrid supports the establishment of a clear process for ascertaining and resolving situations where customers have been transferred erroneously. We consider that this will promote more efficient outcomes in the retail market by improving customer confidence in the transfer process and supporting customers exercising their choice of retailer.

We further support the AEMC's decision not to adopt COAG Energy Council Rule change request to introduce an energy-specific address standard. We agree with the AEMC's conclusion that such an approach would be unlikely to materially reduce customer transfer delays and errors, particularly in light of the work that Ausgrid (and other participants) have undertaken to improve the integrity of their address data. As a result, Ausgrid supports the AEMC's view that introducing an address standard would be overly complex, with the associated implementation costs likely to outweigh any associated benefits to customers.

While Ausgrid considers that there is insufficient evidence of data inaccuracies to warrant the Australian Energy Market Operator's (AEMO) undertaking a full data cleanse of MSATS, we do support AEMO's proposal to implement an address standard on an incremental basis for all new connections.

If you have any queries or wish to discuss this matter in further detail please contact myself on (02) 92697210 or via email murray.chandler@ausgrid.com.au

Yours sincerely,

A handwritten signature in black ink that appears to read "M Chandler".

Murray Chandler
Acting General Manager – Asset Management