



Australian Energy Market Commission
Attention Lily Mitchell
PO Box A2449
SYDNEY SOUTH NSW 1235
(By Email)

Dear Ms Mitchell,

RE: ERC0195 Improving the accuracy of customer transfers, Rule Determination

Thank you for the opportunity to review and provide comment on the draft rule determination to improve the process for addressing transfers that occur without consent.

In general, M2 Energy welcomes the proposed draft rule and specifically the additional proposed rule 57A, which makes it clear what is required of retailers when dealing with customers where consent and transfers are disputed.

However, M2 Energy does not believe that the proposed alteration and additions to Rule 116 (when a retailer must not arrange de-energisation) are required, and considers that the proposed section 116 (1)(j) will add considerable additional costs and delays to retailer disconnection processes.


M2 Energy considers that the existing prohibition on disconnection provided in section 116 (1) (b), where the existence of an unresolved complaint or dispute, should, in-conjunction with the dispute notification process that is proposed in 57A, provide sufficient protection from any possible disconnection during any unresolved transfer dispute. As this provision requirement already exists, and should form part of any review prior scheduling a disconnection, it should not incur any additional process or regulatory burdens on retailer disconnection processes.

M2 Energy also believes that the proposed addition of rule 116 (1) j, will require retailer to retrieve and review each consent record for each potential disconnection, (where less than 12 months with the retailer). This additional process will add considerable time and cost to retail disconnection activities and timelines, and does not promote the efficient operation of energy services. In addition M2 Energy is not clear how the requirement to check for consent could work where a customer is in a deemed relationship with the retailer.

To conclude, M2 Energy considers that the proposed rule 57A should resolve the issues associated with the difficulties customers and retailers have encountered when trying to rectify erroneous transfers in a timely manner, without the need for and increased costs of, the proposed additional prohibition on disconnections.

If you require further information or clarification on M2 Energy's submission, please do not hesitate to contact me on (03) 99233553 or by email at Andrew.Mair@m2.com.au.

Yours faithfully,

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Andrew Mair
Manager, Regulatory & Compliance
M2 Energy Pty Ltd

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