

30 June 2020

Ms Kate Symons  
Chairperson  
Essential Services Commission  
Level 37, 2 Lonsdale Street  
Melbourne VIC 3000

Submitted online via <https://engage.vic.gov.au/electricity-distribution-code-review>

Dear Ms. Symons

### **ESC Electricity Distribution Code Review – Draft Decision**

Thank you for the opportunity to provide a submission in response to the Essential Services Commission's (ESC) consultation covering the Electricity Distribution Code Review – Customer Service Standards Draft Decision (the Draft Decision).

Momentum Energy Pty Ltd (Momentum) is an energy retailer wholly owned by Hydro Tasmania; Australia's largest producer of renewable energy. We pride ourselves on providing electricity at competitive pricing and with outstanding customer service in Victoria, New South Wales, South Australia, Queensland, the ACT and on the Bass Strait Islands. We offer competitive rates to both residential and business customers, as well as a range of innovative energy products and services, including the retail of natural gas in Victoria.

### **New Retailer Obligations**

Momentum is generally comfortable with the intent of the new retailer responsibilities proposed in the Draft Decision. However, we suggest they would be more appropriately located in the Energy Retail Code.

The Electricity Distribution Code is summarised in the Draft Decision as follows:

“The Electricity Distribution Code contains protections for customers as they use and interact with the electricity network. These protections provide customers with

information about *distributor obligations* regarding planned and unplanned outages customers may experience”<sup>1</sup>.

Given that some of the Draft Decision’s proposed changes create *retailer obligations* not *distributor obligations*, they would be better suited to the Energy Retail Code rather than the Electricity Distribution Code. The Energy Retail Code applies to all licensed retailers and it already contains customer protection provisions similar to these proposed new protections. It would be more efficient to limit each industry participant’s obligations to their respective instruments.

## 1. Customer Details to be Shared with Distributors

The Draft Decision proposes to insert a new clause 2.7 into the Electricity Distribution Code. Within this new clause, 2.7.2 places an obligation on retailers to share with distributors particular information about all of their existing customers and each new customer. We expect that the business-to-business (B2B) ‘Customer Details Notification’ already used between retailers and distributors would be best placed to deliver this new requirement. This is particularly true given the Draft Decision posits an effective date of 1 January 2021.

In the table below, we provide comment on differences between the customer details the Draft Decision proposes to require retailers to share with distributors, and the information that is already being shared as part of Customer Details Notifications. We believe some minor amendments to clause 2.7.2 would allow for the delivery of this new requirement through the cost-effective and time-efficient amendment of the existing transaction of information.

Item	Information shared through the existing Customer Details Notification transaction	Information the Draft Decision proposes to share under clause 2.7.2	Comments
1	NMI	‘(g) the National Metering Identifier’	Does this include the NMI checksum as existing transaction does not?
2	NMI Checksum	[Not included]	Is this required?
3	CustomerName	‘(b) contact name’	Will this be the same as ‘(a) name’ for a residential customer?
4	BusinessName	‘(a) name’	Will this be the business name for a business customer?
5	BusinessContactName	‘(b) contact name’	Will this be the name of the contact person for a business customer?
6	Postal Address	‘(d) physical address for service of notices’	Will this be a postal address?
7	DeliveryPointIdentifier	[Not included]	No comment

<sup>1</sup> Essential Services Commission (7 May 2020) Electricity Distribution Code review – customer service standards: Draft decision, p1

8	PhoneNumber1	'(c) All telephone numbers provided by the customer'	Only 2 telephone numbers are provided in the existing transaction. Does the transaction need to be amended to cater for 3 or more telephone numbers?
9	PhoneNumber2	'(c) All telephone numbers provided by the customer'	Same comment as in Item 8.
10	EmailAddress	'(e) Email address (if any) provided by the customer'	No comment
11	SensitiveLoad	[Not included]	No comment
12	[Not included]	'(f) Site address for the National Metering Identifier'	This would need to be included in the current transaction, as currently it is not.
13	MovementType (Update / Site Vacant / Reconciliation)	[Not included]	No comment
14	LastModifiedDateTime	[Not included]	Is this required?
15	[Not included]	'(h) Details of any special circumstances (such as meter access restrictions) of which the <i>customer</i> has informed the <i>retailer</i> or of which the <i>retailer</i> is otherwise aware, and which the <i>distributor</i> requires to assist it to comply with its obligations under this Code'	This is largely covered by the existing SiteAccessNotification B2B transaction. The relevant timing rule is: "In the absence of a relevant request, the CustomerDetailsNotification and/or SiteAccessNotification must be provided within one business day of the relevant data being updated or changed <sup>2</sup> ".

## 2. Ensuring Customers Receive Guaranteed Service Level (GSL) Payments in a Timely Manner

This new provision is designed to avoid any delays in processing GSL payments when a distributor makes a GSL payment to a customer via the customer's retailer.

The Draft Decision's new clause 6.4.5 states:

"Where a **distributor** makes a payment required to be made by this clause 6 via the **retailer**, the **retailer** must apply the payment to the **customer's** account within two **business days**.<sup>3</sup>"

<sup>2</sup> AEMO Markets (1 February 2019) B2B Procedure: Customer and Site Details Notification Process, v3.2, p14

<sup>3</sup> Essential Services Commission (7 May 2020) Electricity Distribution Code review – customer service standards: Draft decision, p93

Distributors typically pay (or credit) GSL payments to retailers by including it in their monthly network bill. A retailer's network bill includes numerous line items of different network charges. Momentum manually verifies the accuracy of the network bills it receives to identify GSL payments that need to be transferred to customer accounts. As this is a manual process, allocated to only a few individuals, the proposed two business days requirement would be significantly challenging. We contend that ten business days would be more appropriate. This would assist with ensuring this task continues to be carried out compliantly and without an increase to operational costs.

Should you require any further information with regard to this submission, please don't hesitate to contact me on [REDACTED] or email [REDACTED]

Yours sincerely

[Signed]

Randall Brown  
Regulatory Manager