

# **Response to the Utilities Commission's Request for Further Information - Electricity Retail Supply Code**

## ***Code Changes***

The Draft Electricity Retail Supply Code (the Code) proposes to reduce the period for the network provider to respond to a data request by a customer from within 20 business days to within 3 business days. It also proposes to reduce the period for the network provider to respond to a data request by a retailer from within 5 business days to within 3 business days.

## ***Key Issues***

- Many of Power and Water's contracted customers have multiple sites and each site can have more than one meter. In one case, for example, a customer has 699 sites with over 1,000 meters. Power and Water is not currently equipped with the appropriate systems and processes to manage data requests of this magnitude in the reduced time frame of 3 days.
- Generally when customer contracts are renewed, requests for data are submitted by customers and/or retailers. These contract renewals are not evenly spread throughout the year resulting in peak periods where requests are significantly higher than other times of the year. In some months in excess of 200 data requests need to be processed.
- The implications of the proposed timeframes for data provision to customers and retailers with current available systems and resources would be that Power and Water could breach the Code.

## ***Preferred Approach***

Power and Water's preferred approach is to adopt a phased implementation of these standards over a period of time to enable current Government regulatory reviews to be completed and allow time for new Power and Water systems and processes to be put into place.

Power and Water would also prefer to have a limit on the maximum number of data requests to be processed per day. Requests above this limit would then not be subject to the standards in the code.

## ***Additional Information***

Data requests are received from retailers and customers for a number of reasons. This includes customers wanting to understand their load profile in order to manage usage or to provide data for pricing purposes. These requests often have differing requirements and range from simple to complex. In some cases customers will make requests for different data sets for different sites which requires additional processing and resources.

Power and Water have previously managed these requests and met the required service standards in the Retail Supply Code using existing systems combined with manual processes. This was primarily due to the manageable volumes of requests which had been evenly spread over time.

Recently the volume of requests has started to increase, particularly in relation to price quotations and complexity. The changing nature of the market, increases in tariffs and increased competition from other retailers has resulted in more requests for consumption data. It should also be noted that data requests can differ in their requirements and complexity depending on the customers intended purpose.

Specifically, there are over 1,200 T4 and T5 customers currently on pricing orders, who could be advantaged by changing to contracts. While these customers can choose to change to contracts at any time, the expiry of the pricing order on 30 June 2013 has created a spike in data requests. As the contracts are 1-3 year contracts this peak period will occur each year. The number of customers with multiple sites is likely to increase as the Government Departments and Councils seek to bundle their sites for electricity pricing purposes.

In addition, there are currently 3,200 customers who have multiple sites and in many cases multiple meters on the sites. This can cause issues with meeting the codes service standards as the code currently does not differentiate between data requests for customers and their sites.

Consequently, Power and Water's current systems and processes may not be able to meet the proposed 3 day time frame for data provision for even one customer if that customer has multiple sites. Should multiple government sites seek data at the same time, then the time frame within which data could be provided would be further extended.

It should be noted that the systems used by PWC are not to the same standard as those used in the National Electricity Market (NEM) where a 3 day provision of data is achievable. PWC is currently investigating new systems to support meter data management and billing functions, however these systems will take time to implement.

This increase in data requests combined with more onerous standards increases the risk that Power and Water may not be able to meet the timeframes proposed in the new Retail Supply Code in the short term.

**Table A: Key facts**

Total number of customers in the Northern Territory is approximately 85,000.

Total number of electricity installations on the regulated network is 75,924.

There are 3,200 multi-site customers with 10,352 associated sites. This corresponds to 21,292 associated meters in total.

It is anticipated that the peak quote period will be March-April each year for contract renewal dates in June. During this period it is estimated that there will be data requests in excess of 200 quotes. We anticipate that a significant proportion of these quotes will have multiple sites.