31 July 2019



Tasmanian Networks Pty Ltd ABN 24 167 357 299 PO Box 606 Moonah TAS 7009

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

Via online submission

Dear Mr Pierce

RE ERC0276/RRC0031 - Reducing Customers' Switching Times

TasNetworks welcomes the opportunity to make a submission to the Australian Energy Market Commission's (AEMC) consultation paper on Reducing Customers' Switching Times. As the Transmission Network Service Provider (TNSP), Distribution Network Service Provider (DNSP) and jurisdictional planner in Tasmania, TasNetworks is focused on delivering safe and reliable electricity network services while achieving the lowest sustainable prices for Tasmanian customers. TasNetworks is therefore supportive of the AEMC's efforts to improve the ability of customers to realise the benefits of participating in the National Electricity Market (NEM) and for processes to better reflect customer expectations.

TasNetworks supports the rule change and agrees with the premise that the changes will improve the customer experience and allow customers to maximise the benefits of retail competition.

TasNetworks has identified some areas where the proposed changes will have an impact on us as a DNSP. As a meter data provider (MDP) there will be more responsibility and workload associated with basic metered sites. As the proposal currently stands TasNetworks, as a MDP, would be required to submit meter reading details within two business days rather than the current 20 business days. TasNetworks would also be required to amend submitted substitute meter readings based on investigations initiated by retailer or customers. This would be an added business function and would require significant changes to our market transaction interface. TasNetworks would therefore like the AEMC to consider timing the changes to be aligned with existing projects rather than be run as a stand alone project. TasNetworks notes that project costs would be reduced if this rule change is delivered within the Five Minute Settlement rule change, effective 1 July 2021, or Global Settlement rule change effective 6 Feb 2019.

Should you have any questions, please contact Tim Astley, NEM Strategy and Compliance Team Leader, via email tim.astley@tasnetworks.com.au or by phone on (03) 6271 6151.

Yours sincerely

Chantal Hopwood Leader Regulation