

29 May 2017

Mr Justin Martyn  
Director  
Utilities Commission  
GPO Box 915 Darwin NT 0801

Dear Justin,

**RE: Application to Amend the Retail Electricity Supply Code**

Jacana Energy is pleased to provide a response to the Utility Commission (Commission)'s Draft positions on the proposed Electricity Retail Supply Code (the Code) amendments submitted by Power and Water Corporation (Power and Water).

We appreciate the work the Commission has done to reach well considered and balanced positions on Power and Water's proposed changes to the Code.

In particular, we consider the Commission's proposal to introduce a new concept of 'Responsible Retailer' into the rules should address the existing confusion around the rights and responsibilities of retailers and customers at sites where a retailer has not yet been assigned to a customer or a customer is out of contract. In these cases, Jacana Energy would be classified as the Responsible Retailer for a customer (with associated access rights to data etc.) until such time as a new retailer has sought verifiable consent from the customer to become that customer's new provider.

Jacana Energy supports the Commission's proposal to require Power and Water to start collecting information on the above circumstances. Ideally, Power and Water should also be required to inform retailers of the specific sites where this is occurring as soon as they become aware of them. This would assist retailers in identifying potential lost revenues due to unallocated consumption and allow for timely actions to limit the financial impacts and initiate revenue recovery processes.

We welcome the Commission's proposal requiring Power and Water to review and consult on the Service Order Procedure (SOP). Efficient B2B processes underpinning the SOP are fundamental to Jacana Energy's capacity to provide a good quality of service to its customers. They are in urgent need of review.

Jacana Energy considers the Commission's proposal to strengthen information sharing requirements in the Code, consistent with the national retail arrangements, will add value to the Code. This is particularly important for retailers who rely heavily on Power and Water for the provision of key information, such as tractable, accurate and timely metering information, in order to provide a satisfying customer experience.

Finally, we look forward to having an opportunity to review the specific Code changes the Commission proposes in order to give effect to the policy positions it has reached.

Should you have any questions or wish to discuss any matter raised in this submission further, please do not hesitate to contact me on 0439 399943.

Yours Sincerely,

Con Van Kemenade  
**Manager Regulation and Industry Development**  
**Jacana Energy**

