

Submission - 2024 Electricity Retail Supply Code Review

Power and Water Corporation (**Power and Water**) was invited to provide feedback on the Utilities Commission's (**Commission**) proposed amendments to the Electricity Retail Supply Code (**Code**). The following response is to the Commission's consultation paper.

General

While the proposed changes largely impact Jacana as the designated Retailer of Last Resort (**RoLR**) and failed retailers, Power and Water have noted that some changes to the Code will impact its operations but can be addressed by modifying procedures. These include the new requirement to reject customer transfer requests by suspended retailers, the new exemption to cooling off periods, and some new information protection and provision requirements. Power and Water do not have any concerns relating to these changes.

RoLR Plans

Power and Water notes that under the proposed clause 9.3, it will need to prepare and maintain a plan to support a timely and coordinated response to RoLR events as both the Network Provider and the Market Operator. Power and Water has no concerns with this requirement.

Timely Customer Transfers

Power and Water, as the Network Provider, acknowledges that it must transfer all customers to the RoLR by the transfer date listed on the notice of a RoLR event. Currently, this process has several manual steps to reflect changes across several systems, including the Retail Management System and our Meter Registers to ensure the transfers have been appropriately actioned and are considered during market settlements. However, Power and Water is transitioning to a new system (Velocity), which will support using the Australian Energy Market Operators Market Settlement and Transfer Solutions. This will allow Power and Waters to coordinate bulk transfers quickly and seamlessly through Velocity.

Power and Water suggest that a minimum timeframe be included between the notification of an RoLR event and the transfer date. This would allow procedures to consider the minimum timeframes to ensure they are robust and meet the Commission's expectations.