

ATTACHMENT 3.1

CLASSIFICATION PROPOSAL

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1. Requirements

Clause 6.8.2(c)(1)(i) of the National Electricity Rules (NER) requires Essential Energy to include in its regulatory proposal a classification proposal showing how the distribution services to be provided by Essential Energy should, in Essential Energy's opinion, be classified under Chapter 6 of the rules. Further, if the classification proposed by Essential Energy differs from the classification suggested in the relevant framework and approach paper, the reasons for that proposed departure.

In addition, the Regulatory Information Notice (RIN) issued by the Australian Energy Regulator (AER) on 7 March 2014¹ requires Essential Energy to address a number of questions in relation to the classification of services. These questions are:

- 2.1 *Identify each proposed service classification which departs from a service classification set out in the framework and approach paper in the regulatory proposal and explain:*
 - (a) *the reasons for the departure, including why the proposed service classification is more appropriate; and*
 - (b) *how the treatment of the service will differ under the proposed service classification in comparison to that in the framework and approach paper.*
- 2.2 *If the proposed service classifications in the regulatory proposal depart from any of the service classifications set out in the framework and approach paper:*
 - (a) *provide, in a second set of regulatory templates, all information required in each regulatory template in accordance with the instructions contained therein, modified as necessary, to incorporate the proposed service classifications; and*
 - (b) *identify and explain where the regulatory templates differ.*

The AER set out its proposed approach on classification of services in the stage 1 F&A published in March 2013. In the stage 1 F&A, the AER proposed a set of service groupings for Essential Energy's distribution services. The Stage 1 F&A also set out how these service groups should be classified for the transitional regulatory control period and the 2015-19 regulatory control period. The AER proposed to group Essential Energy's distribution services as:

- > network services
- > connection services
- > metering services
- > ancillary network services
- > public lighting services

For the above service groups, the AER's proposed classification is largely the same as the classification applied in the current period except for two changes which were:

- > Type 5 and 6 metering services and ancillary network services were re-classified from standard control services to alternative control services.
- > Emergency recoverable works will not be classified by the AER from 1 July 2014, meaning this service will not be regulated. It is currently deemed to be standard control services.

The AER also set out the various components of each of the above service groups and further descriptions of each component.

¹ As amended on 21 March 2014.

2. Essential Energy's classification proposal - summary

Essential Energy's classification proposal adopts the AER's classification of services as proposed in the Stage 1 F&A. As such, the requirements of the AER's RIN as contained in paragraphs 2.1 and 2.2 do not need to be addressed. Further, Essential Energy agrees with the AER that none of the services provided by Essential Energy are suited to being classified as negotiated distribution services.

Whilst we propose no departure from the AER's decision on the classification of the distribution services we provide, we note that there are several areas where we consider the AER's determination could provide more clarity on service description. These are:

- > Specification of network augmentations as part of network services - Categorising network augmentations under the broader service grouping of 'connections' but not network services is problematic. Augmentations of the network may be driven by new customers connecting to our network, and can also be driven by the need to reinforce the network as a result of increasing demand on the network from existing users², improving security of the network where the consequences of supply loss are high, restoring capacity lost due to de-rating of existing assets, and to address voltage or fault duty issues. We request that the AER's draft determination make clear that augmentations may also relate to these issues and therefore form part of network services.
- > Seeking further clarity from the AER on the classification of emergency recoverable works; particularly in the case where Essential Energy is unable to identify the party (or parties) that caused the damage or where Essential Energy is unable to recover the cost of repair from an identified party. We outline our consideration in section 3 below.
- > Minor clarification in relation to the description of certain ancillary network services.

Against the context set out above (and to ensure clarity), we set out in this attachment:

- A. A listing of the distribution service groups and respective components of these service groups and their definitions, descriptions and classification.
- B. For fee based and quoted service (i.e. ancillary network services):³
 - a. explanation of the purpose of the service and a list of the activities which comprise each service; and
 - b. specification if the charges are for fee based and/or quoted services.

3. Emergency recoverable works

In the Stage 1 F&A paper, the AER determined that emergency recoverable work is a distribution service but not to classify these works on the basis that the cost of these works are recoverable at common law.⁴

Whilst we concur with the AER's 'classification' of these services for the 2014-19 period, we however seek clarity from the AER on the scope of this classification, particularly in light of the recent and further consideration by the AER in respect of this matter for the Queensland DNSPs' framework and approach paper.

On 30 April 2014, the AER issued its final framework and approach paper for the Queensland distribution business (QLD DNSPs). In this paper, the AER addressed concerns raised by the QLD DNSPs on the AER's approach of not classifying emergency recoverable works. In response to Ergon Energy's submission that emergency recoverable work should be classified as standard control services because it is not always possible to recover costs from the responsible parties nor is it always possible to identify the responsible party, the AER stated:

We are not persuaded by the arguments submitted by the distributors that we should change our proposed classification of emergency recoverable works.....We consider that in circumstances where the party responsible for damaging the network is not identifiable, related costs are not recoverable. Therefore,

² Or combined growth related to existing and new users.

³ As required by the requirements of paragraph 13.1(a) of the RIN.

⁴ Stage 1 F&A paper, page 20.

*works to repair that damage would not be considered emergency recoverable works. Rather, they would be emergency works.*⁵

In the same framework and approach paper, the AER defined 'emergency works' as works relating to repairing the distribution network after damage to restore or maintain electricity supply. This is analogous to the definition the AER applied for Essential Energy's emergency response works of 'works performed by the distributor to repair the distribution network following a natural disaster or for example, a lighting strike to a pole'.⁶ Emergency response works are classified, for Essential Energy for the 2014-19 period, as standard control services.

In this light, we seek clarification from the AER on the scope and application of its classification of emergency recoverable works, particularly in the instances where Essential Energy needs to repair damage to its distribution network caused by a third party, whom Essential Energy could not identify or from whom Essential Energy could not recover the costs of repairing the damage. In these instances, consistent with the AER's consideration in the QLD DNSPs framework and approach paper, the costs of repair is not recoverable and hence do not form part of emergency recoverable works but rather emergency response works which would form part of the 'Network services' service group and be classified as standard control services.

Essential Energy considers that the above clarification is consistent with the position that we had put forward to the AER during the consultation on classification of services for the 2014-19 period. In response to the AER's proposed approach of not classify emergency recoverable works, we noted that these works should be:

*Unclassified only if DNSP costs are recovered from third party otherwise standard control*⁷

In its Stage 1 F&A paper, the AER cited our support to its proposed approach of not classifying emergency recoverable works without further elaborating on its consideration on our qualification to this support as noted above. Now that the AER has clarified its position in relation to the scope of the classification of emergency recoverable works for the QLD DNSPs, we seek the same clarity from the AER in its distribution determination on classification of services for the 2014-19 period. That is, costs of repairing damages to our network caused by a third party is categorised as emergency recoverable works only in the case such costs can be recovered (i.e. recoverable) and to the extent that such costs are not recoverable from third parties (due to identification issue or liability not established), such costs would form part of emergency response works and be classified as standard control services and recovered via the general distribution use of system charges.

We seek further opportunities to work with the AER on how to effect the above classification in terms of cost recovery via DUOS prices.

4. Further details of Essential Energy's classification of service proposal

Clause 6.2.1 of the rules allows the AER to group distribution services together for the purpose of classification, and if this is the case, a single classification made for the group applies to each service comprised in the group as if it has been separately classified. In the Stage 1 F&A, the AER proposed to group the distribution services provided by Essential Energy into the following groups:

- > network services
- > connection services
- > metering services
- > ancillary network services
- > public lighting services.

The AER further disaggregated each of these service groups into 'class of activities' with a further description for these classes. We note that the AER's approach is to classify a class of activities rather than the specific activities that form part of the service. This is to provide the NSW distributors with flexibility to alter the exact specification (but not the nature) of a service during the transitional and 2015-19 regulatory control periods.⁸

⁵ AER, Final framework and approach for Energex and Ergon Energy, Regulatory control period commencing 1 July 2015, April 2014, p28.

⁶ AER's Stage 1 F&A paper for Essential Energy, page 20 and footnote 47.

⁷ Email to the AER on 27 February 2013.

⁸ AER, Stage 1 Framework and approach paper, Essential Energy, Endeavour Energy and Essential Energy, transitional regulatory control period 1 July 2014 to 30 June 2015 and subsequent regulatory control period 1 July 2015 to 30 June 2019, March 2013, p16.

The AER then proposed a service classification to each of these 'class of activities', from which Essential Energy proposes no departure for the purpose of its classification proposal for the 2014-19 regulatory control period.

However, for reasons of clarity and completeness, we outline the 'class of activities' within each service groups and our proposed clarification on the AER's descriptions of these classes in the tables below.

Table 1 – Network services

Class of activities	Description (if any) as per the AER's Stage 1 F&A	Essential Energy's proposed description	AER's proposed service classification	Essential Energy's proposed service classification
Emergency recoverable works	Work to repair damage to the distribution network caused by a third party.	Same as the AER's description	Unclassified, hence unregulated.	Same as the AER's proposed classification ie. Unregulated to the extent that the repair is recoverable from a third party. For instances where costs are not recoverable from a third party, these are not emergency recoverable works and hence is not 'unclassified' but rather form part of standard control services.
Constructing the network	<ul style="list-style-type: none"> • Network construction (other than construction of connection assets provided contestably) • Project planning and works management (works program development, procurement, vendor management, contract management, work scheduling and dispatching) • Management of environmental issues • Asset deployment and commissioning • Asset relocation (other than those undertaken at a customer's request) • Works to fix damage to the network (other than emergency recoverable works) • Training for internal staff (e.g. safety) • Operational technology supporting the network • Pole replacement 	<p>Same as the AER's description with the following assumptions:</p> <p>a) It is assumed that an asset relocation at the customer's request will be unclassified and hence unregulated</p> <p>b) Other customer specific services such as conversion to aerial bundled cable at the request of the customer have not been recognised in the AER's description. Therefore we consider that these services are unclassified and hence unregulated.</p>	Direct control services and further standard control services	Same as the AER's proposed classification, except for 'work to fix damage to the network'. As outlined above, Essential Energy considers this activity would include works performed to repair from damages caused by a third party and the cost of repair is not recoverable from a third party.

Class of activities	Description (if any) as per the AER's Stage 1 F&A	Essential Energy's proposed description	AER's proposed service classification	Essential Energy's proposed service classification
Maintaining the network	<p>Asset maintenance and network/asset performance management including:</p> <ul style="list-style-type: none"> • Performance and condition monitoring • Asset optimisation • Asset maintenance/replacement/refurbishment program management • Asset performance reporting • Network systems maintenance • Asset retirement • Vegetation management, inspection and testing 	Same as the AER's description	Direct control services and further standard control services	Same as the AER's proposed classification
Operating the network for distributor purposes	<ul style="list-style-type: none"> • Implementing Network Management Plan • Network/asset operations: network control and operation, outage management, emergency management field operations, commissioning of assets • Customer interactions (including in relation to network product development, customer service management, complaints and enquiries, record management, debt collection and disconnections) • Market operations: includes revenue management, network billing and disputes, processing and publication of notifications of new connections and alterations, market notifications of retailer changes • Environment, Health & Safety (EHS management (risk assessment, monitoring, program management, reporting and training) • GIS (Dial Before You Dig services) • Compliance monitoring and reporting • External stakeholder interaction (industry, regulatory, government) • Pricing and regulatory affairs • Financial and commercial management and reporting 	Same as the AER's description. We note that the Network Management Plan is required by the Electricity Supply (Safety and Network Management) Regulation 2088 and it addresses the management of the network, customer installation safety, bush fire risk management and public safety information.	Direct control services and further standard control services	Same as the AER's proposed classification
Planning the network	<ul style="list-style-type: none"> • Network/asset planning (asset needs assessment, asset investment planning, asset management planning, asset delivery planning. Includes risk 	Same as the AER's description	Direct control services and further standard control services	Same as the AER's proposed classification

Class of activities	Description (if any) as per the AER's Stage 1 F&A	Essential Energy's proposed description	AER's proposed service classification	Essential Energy's proposed service classification
	and feasibility assessment, estimating and cost planning) <ul style="list-style-type: none"> • Regulatory planning • Demand management planning • Network business strategy development, strategic initiatives development and management (including business improvement/efficiency initiatives) • Participation in industry planning • Governance, policies, procedures, standards 			
Designing the network	Design standards and designing the network	Same as the AER's description	Direct control services and further standard control services	Same as the AER's proposed classification
Emergency response	Outage management, emergency management (for example, reinstatement of network after natural disaster)	Same as the AER's description	Direct control services and further standard control services	Same as the AER's proposed classification
Administrative support	Includes call centres, network claim processing, network billing (including consumption data storage and analysis)	Same as the AER's description	Direct control services and further standard control services	Same as the AER's proposed classification

Table 2 – Connection services

Class of activities	Description (if any) as per the AER's Stage 1 F&A	Essential Energy's proposed description	AER's proposed service classification	Essential Energy's proposed service classification
Premises connection assets	<p>Includes any additions or upgrades to the connection assets located on the customer's premises which are contestable (Note: excludes all metering services).</p> <p>Premises connection assets can be further described as:</p> <p>A. Design and construction of premises connection assets (where these services are provided contestably)</p> <p>B. Part design and construction of connection assets that are not available contestably, (generally as a result of safety, reliability or security reasons). Those parts of project works that are performed and funded by the distributor.</p>	Same as the AER's description	<p>A. Unclassified</p> <p>B. Standard control</p>	Same as the AER's proposed classification
Extensions	<p>An enhancement required to connect a power line or facility outside the present boundaries of the transmission or distribution network owned or operated by a Network Service Provider that is:</p> <p>A. undertaken by an ASP on behalf of a customer (unclassified)</p> <p>B. undertaken by a customer but partly funded by a NSP (NSP contribution would be classified as a standard control service while the customer funded component of the service would be unclassified.)</p> <p>C. undertaken by a network service provider (standard control)</p>	Same as the AER's description	<p>A. Unclassified</p> <p>B. Unclassified/ standard control based on contribution (see previous column)</p> <p>C. Standard control</p>	Same as the AER's proposed classification
Augmentation	<p>A. Any shared network enlargement/enhancement undertaken by a distributor which is not an extension (standard control)</p> <p>B. Any shared network enlargement/enhancement undertaken by a customer, but partly funded by a NSP (NSP contribution would be classified as a</p>	Essential Energy adopts the same description for this class of activities. However, as detailed above, we note the problematic nature of only categorising 'augmentation' under the	<p>A. Standard control</p> <p>B. Unclassified/ standard control based on contribution (see</p>	Same as the AER's proposed classification

	standard control service while the customer funded component of the service would be unclassified)	'connection' service group.	previous column) C. Unclassified	
	C. Any shared network enlargement/enhancement undertaken by a customer (unclassified)			

Table 3 – Metering services

Class of activities	Description (if any) as per the AER's Stage 1 F&A	Essential Energy's proposed description	AER's proposed service classification	Essential Energy's proposed service classification
Types 5 and 6 metering installation	Includes on site connection of a new meter at a customer's premises, and on site connection of an upgraded meter at a customer's premises where the upgrade is initiated by the customer. Excludes installation of replacement types 5 and 6 meters initiated by the DNSP.	Same as the AER's description, noting that the installation of a new meter is for a whole current (up to 100A) meter.	Unclassified	Same as the AER's proposed classification
Types 5 and 6 metering provision, maintenance, reading and data services	Meter provision refers to the capital cost of purchasing the metering equipment to be installed. Meter maintenance covers works to inspect, test, maintain, repair and replace meters. Meter reading refers to quarterly or other regular reading of a meter. Metering data services are those that involve the collection, processing, storage and delivery of metering data and the management of relevant NMI Standing Data in accordance with the Rules.	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Type 7 metering services	Administration and management of type 7 metering installations in accordance with the Rules and jurisdictional requirements. Includes the processing and delivery of calculated metering data for unmetered loads, and the population and maintenance of load tables, inventory tables and on/off tables.	Same as the AER's proposed description.	Standard control service	Same as the AER's proposed classification

Table 4 – Public Lighting services

Class of activities	Description (if any) as per the AER's Stage 1 F&A	Essential Energy's proposed description	AER's proposed service classification	Essential Energy's proposed service classification
Provision, construction and maintenance of public lighting and emerging public lighting technology	No further description	Same as the AER's description.	Alternative control service	Same as the AER's proposed classification

Table 5 – Ancillary network services

Class of activities	Description (if any) as per the AER's Stage 1 F&A	Essential Energy's proposed description	AER's proposed service classification	Essential Energy's proposed service classification
Design related services	Provision of design information, design certification and design rechecking services in relation to connection and relocation works provided contestably	Provision of design information, design certification and design re-certification services in relation to connection and relocation works provided contestably.	Alternative control service	Same as the AER's proposed classification
ASP inspection services	Inspection and re-inspection of contestable connection and relocation works performed by Accredited Service Providers (ASPs)	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Reinspection of installation work in relation to customer assets	Reinspection by a distributor of private electrical wiring work undertaken by an electrical contractor, required where the first inspection revealed defective work.	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Contestable substation commissioning	Includes Contestable substation commissioning (complex) and Contestable substation commissioning (basic). Involves the process of connecting the substation to the network. Complex involves kiosk and chamber substations that may involve protection settings. Basic is generally pole mounted substations.	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Access permits	The provision of an access permit by a distributor to a person authorised to work on or near distribution systems including high voltage.	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Clearance to work	The provision of a clearance to work by a distributor to a person authorised to work on or near the system generally at a low voltage.	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Access (standby person)		The provision of access to switch rooms, substations and the like to an ASP who is accompanied by a distributor's staff member, but does not include the circumstance where an ASP is provided with keys for the purpose of securing access and is not accompanied by distributor's staff member.	Alternative control service	Same as the AER's proposed classification

Notices of arrangement	Work of an administrative nature performed by a distributor where a local council requires evidence in writing from the distributor that all necessary arrangements have been made to supply electricity to a development. This may include receiving and checking linen plans and 88 B instruments, copying linen plans, checking and recording easement details, preparing files for conveyancing officers, liaising with developers if errors or charges are required, checking and receiving duct declarations and any amended linen plans and 88B instruments approved by a conveyancing officer and preparing notifications of arrangement.	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Authorisation of ASPs	Annual authorisation of individual employees and sub-contractors of ASPs and additional authorisations at request of ASP. Authorisation excludes training costs.	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Administration services relating to work performed by ASPs, including processing work		Work of an administration nature (not including work of an administrative nature described in service - Notice of Arrangement or Authorisation of ASPs), including the processing of Level 1 and/or Level 3 work where the customer is lawfully required to pay for the Level 1 and / or Level 3 work.	Alternative control service	Same as the AER's proposed classification
Conveyancing information	Supply of conveyancing information – desk inquiry; Supply of conveyancing information – field visit	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Site establishment fee services	Site establishment services, including issuing of meters and liaising with the AEMO or market participants for the purpose of establishing NMIs in market systems, for new premises or for any existing premises for which AEMO requires a new NMI.	Site establishment services, including issuing of meters (where applicable) and liaising with Australian Energy Market Operator (AEMO) or market participants for the purpose of establishing NMIs in market systems, for new premises or for any existing premises for which AEMO requires a new NMI and for validation of and updating network load data.	Alternative control service	Same as the AER's proposed classification

Customer interface coordination for contestable works		This service is proposed where customer connections or asset relocations may require a high level of DNSP involvement in order to coordinate a range of inputs from the DNSP to help establish the connection.	Alternative control service	Same as the AER's proposed classification
Preliminary enquiry service	For services provided to connection applicants making a preliminary enquiry requiring site-specific or written response	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Connection offer service (basic or standard)	For services provided by distributors in assessing the applicant's application and making a basic or standard connection offer	For services provided by distributors in assessing the applicant's connection application and making basic or standard connection offer.	Alternative control service	Same as the AER's proposed classification
Reconnections/Disconnections	Disconnection or reconnection visits (acceptable payment received); Disconnections or reconnections at the meter box (technical/hard disconnect); Disconnections or reconnections at the meter box (non-technical/soft disconnect); Disconnections or reconnections at the pole top/pillar box; Disconnections or reconnections outside of business hours.	Disconnection or reconnection visits (site visit only); Disconnection or reconnection (disconnection completed); Disconnection or reconnection (disconnection completed - Technical); Disconnection or reconnection visit (pole top or pillar box); Disconnections or reconnections (site visit only - pole top or pillar box); Disconnections or reconnections outside of business hours.	Alternative control service	Same as the AER's proposed classification
Ancillary metering services	For example, special meter reading for types 5 and 6 meters; testing for type 5 and 6 meters; franchise CT meter install; customer requested meter accuracy testing; types 5-7 non-standard metering data services; replacement or removal of a type 5 or 6 meter instigated by a customer switching to a non-type 5 or 6 meter that is not covered by any other fee.	For example, special meter reading for types 5 and 6 meters; customer or retailer requested meter accuracy testing for type 5 and 6 meters; franchise CT meter install; Request for Customer Energy Consumption Data, Tariff or Distribution Information; replacement or	Alternative control service	Same as the AER's proposed classification

		removal of a type 5 or 6 meter instigated by a customer switching to a non-type 5 or 6 meter that is not covered by any other fee; Emergency maintenance of failed metering equipment not owned by the Network.		
Off-peak conversion		The alteration of the off-peak metering equipment at a customer's premises for the purpose of changing the hours of the metering equipment's operation.	The alteration of the off-peak metering equipment at a customer's premises for the purpose of changing the hours of the metering equipment's operation.	Same as the AER's proposed classification
Rectification works	Includes rectification of illegal connections, provision of service crew/additional crew, fitting of tiger tails, high load escorts	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Connection/relocation process facilitation		Providing connection applicants with ongoing information and advice in relation to the connection process and requirements associated with establishing a new or altered connection or a relocation of existing network assets.	Alternative control service	Same as the AER's proposed classification
Services to supply and connect temporary supply to one or more customers	Including equipment and related costs in relation to planned access permits	Same as the AER's proposed description.	Alternative control service	Same as the AER's proposed classification
Carrying out planning studies and analysis relating to distribution (including sub-transmission and dual function assets) connection applications		This service undertakes necessary planning studies and associated technical analysis to help determine suitable/feasible connection options for further consideration by proponents.	Alternative control service	Same as the AER's proposed classification
Services involved in		Services related to the	Alternative control service	Same as the AER's

<p>obtaining deeds of agreement in relation to property rights associated with contestable connection works</p>		<p>acquisition of tenure over and access to DNSP assets associated with contestable connection works.</p>		<p>proposed classification</p>
<p>Investigation, review and implementation of remedial actions associated with ASPs' connection work</p>		<p>The investigation, review and implementation of remedial actions associated with contestable connection works leading to corrective and disciplinary action of an ASP due to unsafe practices, substandard workmanship or other serious circumstances that impact upon ongoing Authorisation as an Accredited Service Provider to NSW DNSPs.</p>	<p>Alternative control service</p>	<p>Same as the AER's proposed classification</p>
<p>Network tariff change request</p>	<p>When a customer or retailer requests an alteration to an existing network tariff (for example, a change from an Inclining Block Tariff to a Time of Use tariff), the NSW distributors conduct tariff and load analysis to determine whether the customer meets the relevant tariff criteria. The NSW distributors also process changes in their IT systems to reflect the tariff change.</p>	<p>When a Retailer's customer or Retailer requests an alteration to an existing network tariff (for example, a change from an Inclining Block Tariff or Time of Use tariff to a capacity tariff), Essential Energy conducts tariff and load analysis to determine whether the customer meets the relevant tariff criteria. Essential Energy also processes changes in Essential Energy's IT systems to reflect the tariff change.</p>	<p>Alternative control service</p>	<p>Same as the AER's proposed classification</p>

Recovery of debt collection costs – dishonoured transactions	B2B service orders from retailers to obtain a final read for customer move-outs or to obtain a start read where property has been vacant	<p>We note that the description of the service (2nd column from left) is incorrect with respect to the activity ‘recovery of debt collection costs – dishonored transactions’. This description is relevant to the activity ‘move in move out meter reads’ (see below). In relation to this activity of ‘recovery of debt collection costs – dishonored transactions’, Essential Energy proposes the description to be:</p> <p>The incurrence of costs, including bank fees by Essential Energy resulting from this dishonor of a customer or ASP’s cheques tendered in payment of network related services</p>	Alternative control service	Same as the AER’s proposed classification
Services provided in relation to a Retailer of Last Resort (ROLR) event	<p>The NSW distributors may be required to perform a number of services as a distributor when a ROLR event occurs. These include:</p> <p>Preparing lists of affected sites, and reconciling data with AEMO listings; handling in-flight transfers; identifying open service orders raised by the failed retailer and determining actions to be taken in relation to those service orders; arranging estimate reads for the date of the ROLR event and providing data for final NUOS bills in relation to affected customers; preparing final invoices for NUOS and miscellaneous charges for affected customers; preparing final debt statements; extracting customer data, providing it to the ROLR and handling subsequent enquiries; handling adjustments that arise from the use of estimate reads; assisting the retailer with the provision of network tariffs to be applied and the customer move in process;</p>	Same as the AER’s proposed description.	Alternative control service	Same as the AER’s proposed classification

	administration of any 'ROLR cost recovery scheme distributor payment determination'.			
Attendance at customers' premises to perform a statutory right where access is prevented.		A follow up attendance at customers' premises to perform a statutory right where access was prevented or declined by the customer on the initial visit.	Alternative control service	Same as the AER's proposed classification
Vacant property reconnect/disconnect	Includes customer request for ad-hoc reconnections/disconnections for regular but short periods of time, for example, holiday homes.	At the request of the Retailer, a site visit to a customer's premises to disconnect or reconnect the supply of electricity due to: a vacant premises; or a site where the power is on, for example holiday homes.	Alternative control service	Same as the AER's proposed classification
Move in move out meter reads	Includes customer request for ad-hoc reconnections/disconnections for regular but short periods of time, for example holiday homes.	We note that the description provided by the AER is an inadvertent duplication of the description pertaining to 'vacant property reconnect/disconnect. Essential Energy proposes the following description for this service. B2B service orders from retailers to obtain a final read for customer move-outs or to obtain a start read where property has been vacant . This includes customer or retailer requests for a final or start read when a customer movement occurs.	Alternative control service	Same as the AER's proposed classification