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**Retail Market Transition Arrangements*****Q1. Do you agree with our proposal to mandate that there can be no customer switches under the existing Customer Transfer Protocol during the last [x] days before market opening?***

Yes, we support the limitation on switching during the transition stage. We suggest that a slightly longer timescale than the proposed 20 days may be appropriate to limit overlap at the beginning of market go live, when there will be lots of changes to the way the market work.

***Q2. Do you agree with our proposal to use a Schedule 11 transition scheme to revoke all WSLs (including CSLs – subject to alternative provisions being put in place)?***

We agree that a schedule 11 transition scheme is an appropriate approach. We feel that careful consideration of all the potential scenarios is required to ensure that they are addressed as part of the transition, for example, being clear what happens to customers where a company holding a Water Supply Licence (WSL) does not apply for a new Water and Sewerage Supply (WSSL) licence.

In addition we feel that the transition scheme will need to be very specific about any dates for transition. Many documents refer to April 2017 for opening of the market. However both 1 April 2017 and 3 April 2017 have been referred to in different discussions, for example in relation to CMOS operation, 3 April is referred to as it is the first business day in April.

The consultation discusses time of day (e.g. the references to 23.59) but we would like to see all dates specifically referenced, so if licences are to be revoked on 31 March 2017, then this should be made explicit, but if something else is to happen on 3 April 2017, then this should also be made clear.

We believe that all transition activities should happen for 1 April 2017, unless they relate to a companies market exit date.

***Q3. Should the proposed Schedule 11 transition scheme make provision for what should happen to any existing wholesale contracts?***

Yes, we feel that the transition scheme should cover all issues relating to transition, and it should set out a clear and consistent approach for all customers. However, the transition scheme should be proportionate in the scale of work set out for existing WSLs.

***Q4. Are there any other elements of the current arrangements that should be included in the proposed Schedule 11 transition scheme (either to revoke or terminate them, or to make provision for them to continue in some form, if that is consistent with the provisions of the Act)?***

We feel that the transition scheme should be clear on how customers are allocated a retailer if their WSL does not transition to a WSSL, as well as provide clarity on what would happen to their contracts and especially their price terms. Some information was discussed in the consultation, but we feel that much more detail on different potential scenarios is required. For example, if these customers are allocated to their undertaker, would they go back to default tariffs? What happens if their undertaker is exiting the retail market?