

2022 CSA Transition

Summary of RSP feedback on draft mark-up

Background

In April we provided a Customer Update which confirmed we were narrowing the scope to essential regulatory changes and outlined our high-level timeline to January 2022, when the proposed changes are intended to take effect. As part of this update we also shared the draft mark-up of the general terms for your review and feedback.

The consultation period closed on 31 May. Over the past few weeks, we have had the opportunity to review and collate the feedback received.

Summary of RSP feedback

A summary of the consolidated RSP feedback we received is set out below:

- Feedback was varied and suggested a lack of alignment across RSPs on the level of change expected.
- Several RSPs were comfortable with the drafted changes being kept to a bare minimum required to reflect the regulatory changes, although one did note this felt like a missed opportunity to effect changes across a broader scope.
- One RSP suggested the changes drafted go further than expected and noted the difficulty in agreeing to the mark-up before the regulatory changes are confirmed.
- There was specific feedback relating to the upcoming regulatory changes, including:
 - An expectation to see the price quality determinations cross referenced.
 - A question on whether the agreement should reflect that the concept of a price cap remains for anchor and declared services.
 - Suggestion of multi-year glide paths for pricing.
- Questions were raised regarding the Change Management and UFB Product forums, and how they might operate.
 - The product forum is already established, and we are not proposing to make any changes to this.
 - Change management falls outside of scope for Required Change, however we agree we can work on behavioural changes to improve this with RSPs.
- Two RSPs suggested the security clauses should be marked-up and captured as part of the 2022 CSA transition process.