

## B2B Procedures

- Customer and Site Details
- Service Orders (version change)
- Meter Data (version change)
- One Way Notification (version change)
- Technical Delivery Specification (version change)

## CONSULTATION – First Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Tango Energy

***Completion Date:*** 26 April 2018

# Table of Contents

- 1. Customer and Site Details ..... 3
- 2. Option and commentary for long term solution ..... 4

## 1. Customer and Site Details

Participant Name	Old Clause No	New Clause No	Comments
Tango Energy		General – Use of E-mail	<p>Tango Energy recognises the need for changes to Life Support processes in light of the NERR change. However, we question if the proposed use of email, in the format outlined in the Procedures, is the most efficient, user friendly and cost effective way of addressing the NERR change.</p> <p>As it is intended for this to be an interim process, to have the email life support transaction replicate a B2B transaction with 'Field', 'Format' and 'Use' requirements is viewed as onerous and over prescriptive. Given this is a manual process there is a greater chance of errors occurring therefore placing participants at undue risk of being in breach of these Procedures. It is suggested a simpler approach be taken as to how the information, required under the NERR change, is conveyed. It is suggested, if e-mail is the preferred method, a reference to the use of email be made in the Procedures with appropriate templates and/or detail provided in the B2B Guide. We also express concern with the ongoing use of email as a solution for life support given potential issues of security and reliability. We suggest the IEC consider more appropriate methods for the provision of this information and perhaps explore use of the LVI for this transaction in the interim.</p>
Tango Energy		General – Life Support Equipment	<p>With regard to the life support equipment, we can find no reference in the NERR changes requiring this information to be specifically recorded (outside of the medical confirmation form). From our reading of the NERR and Procedures we can find no justification for the provision of this data and question why it is required. All customers on life support should be treated equally regardless of the type of life support equipment 'installed' at the customer's premises,</p>

Participant Name	Old Clause No	New Clause No	Comments
			therefore distinguishing the type of life support equipment is not critical and the requirement should be removed.
Tango Energy		General – Multiple Parties	The Procedures identify the Current Retailer as the Initiator of the CustomerDetailsNotification. The Guidance Notes provided in the Procedure indicate the Recipient of the notification is the DNSP. With the recent Power of Choice (PoC) implementation it is clear participants other than the DNSP have the ability to de-energise a customer's premises. It is recommended that a holistic approach be adopted when addressing life support such that each party (DNSP, MC, and MP) who can affect the supply at a customer's premises has access to and is aware of the current status of life support.
Tango Energy	4.4	4.5	The Procedures, as drafted, do not seem to address impacts to the Customer Details Reconciliation process specified in clause 4.5. Clause 4.5 (b) advises that Retailers must conduct the Customer Details Reconciliation with the DNSP/s at least four times per year for NMI's with Life Support. Given that both the Retailer and the DNSP are now responsible for maintaining Life Support Registers, it would be reasonable to suggest that this transaction should also be addressed.

## 2. Option and commentary for long term solution

With regard to the longer term solution – Central Repository or B2B Transaction, Tango provides the following:

1. The solution should consider leveraging existing systems, transactions and processes to ensure minimal and cost effective change.
2. It is suggested a holistic approach to the solution be adopted. B2B, MSATS and other AEMO projects (e.g. Standing Data Project) that could provide a solution for life support processes be considered.

3. The solution should address all life support requirements and not be restricted to just addressing the NERR changes. This includes how participants (MCs, MPs - new and current), other than the Current FRMP and DNSP, who can de-energise a premises are involved in the process.
4. Consideration to be given to the Reconciliation process as there are now two parties (Retailer and Distributor) who are responsible for registering life support as well as other key parties (see 3. above).
5. All solutions under consideration should be detailed, giving consideration to scope of change, complexity of implementation and cost.
6. A consideration in all solutions put forward is the solution's ability to meet the requirements of the NEO and B2B principles and Factors. The chosen solution must meet these requirements.