

26 April 2018



Ms Audrey Zibelman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

Dear Ms Zibelman

B2B Procedure Changes

Energy Queensland appreciates the opportunity to provide a submission to the Australian Energy Market Operator (AEMO) on the proposed B2B Procedure changes published for consultation on 19 March 2018. AEMO is consulting on amendments made to the B2B Procedure as a result of the Australian Energy Market Commission's final determination on the strengthening protections for customers requiring life support equipment rule change on behalf of the Information Exchange Committee (IEC).

Energy Queensland has provided feedback on the proposed changes as well as comments on the proposed interim email solution and long-term solution in the attached participant response template.

Energy Queensland acknowledges the significant work undertaken to date by the IEC, B2B Working Group and AEMO and would welcome being involved in any further engagement on development of the B2B Procedure.

Should you require additional information or wish to discuss any aspect of the attached submission, please do not hesitate to contact either myself on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours sincerely

A handwritten signature in black ink, appearing to read "Jenny Doyle", with a stylized flourish at the end.

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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: Energy Queensland

Completion Date: 26 April 2018

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1. Customer and Site Details

Participant Name	Old Clause No	New Clause No	Comments
Energy Queensland		4.3.2 (b) Sensitive Load	Energy Queensland's DNSPs, Ergon Energy and Energex, do not utilise the Sensitive Load field for market purposes and its use by a Financially Responsible Market Participant (FRMP) does not provide any additional or material difference to planned site works, unplanned outages or restoration activities. However, we have no objection to the use of the Sensitive Load field within the B2B Procedure for other jurisdictions.
Energy Queensland		4.4.1 Life Support Notification	The B2B Procedures as currently drafted do not deal with the process for managing multiple Life Support flag requirements for a single NMI, such as a bulk supply point (e.g. a nursing home with 50 customers under a single NMI, of which only five are Life Support). The Procedures need to clarify whether the initiator is expected to provide multiple Life Support notifications against the single NMI as each Life Support customer's name and equipment details will be different. Energy Queensland would appreciate a consultative approach with the B2B Working Group to ascertain a manageable solution for multiple customer relationships under one NMI.

Participant Name	Old Clause No	New Clause No	Comments
Energy Queensland		Table 5 Data requirements for LS Notification – NEW data requirement	Energy Queensland proposes an additional Life Support field of ‘Preferred method of contact’ which will allow participants to ensure their Life Support customers are receiving written communication of planned or unplanned interruptions via the most effective method (e.g. postal address, street address or email address).

2. Alternative option for interim measure

While Energy Queensland appreciates that a decision has already been made by the Information Exchange Committee (IEC) to implement the email solution as an interim measure while longer term solutions are explored, we make the following suggestion as a potential alternative option. Rather than using off-market processes which bring additional risk with respect to life support management and are significantly more labour intensive to manage, Energy Queensland proposes that participants continue to use the existing CDN exchange of the Life Support flag (addition and removal). This process could be complemented by the registration process owner providing a completed medical certificate when it is received from the Life Support customer to the relevant participant, i.e. a copy (.pdf) or the details (.xls or .xml). This alternative process would ensure that the customer’s Life Support status is flagged and reduce the administrative burden.

3. Option and commentary for long term solution

Energy Queensland supports further exploration of Option 2 which considers the development of a central repository for life support information that will provide the current FRMP / LNSP with the ability to create, update, remove and reconcile life support information. To complement the central repository, Energy Queensland also suggests that consideration should be given to including the Life Support flag in the standing data stored for each NMI (and removing it from the existing Customer Detail Notification (CDN)).

In exploring the possibility of having the Life Support flag included as NMI standing data, consideration should be given to the following:

- 1) Removal of Life Support from CDNs and management via the CATS process.
- 2) The creation of two separate Life Support flags so that it is understood who the registration process owner is, i.e.:
 - i. FRMP initiated LS flag = 'FRMP LS'; and
 - ii. DNSP initiated LS flag – 'DNSP LS'.
- 3) The use of the existing CR5055 by the FRMP to manage and maintain the Life Support flag (which will require minor modifications to include the Life Support field).
- 4) The use of CR5051 by the LNSP to manage and maintain the Life Support flag which will require minor modifications to include the Life Support field.
- 5) Making the Life Support flag a discoverable field in the NMI Discovery process to ensure market participants are fully aware of Life Support implications. This includes pending / prospective market participants.
- 6) Making a new report available in MSATS that will provide the NMI and certified Life Support flag to enable reconciliation processes with the central repository extracts. This report should only be available to participants who are a party to the NMI.

In developing a central repository, Energy Queensland considers that the following should be considered:

- 1) The repository should be used to upload registration details for audit purposes by the registration process owner (FRMP/DNSP).
- 2) All participants who are parties to the NMI must have access to the repository and be able to view Life Support details.
- 3) The repository should have the ability to receive updates from MSATS to maintain participant relationships, NMI status and NMI Life Support status updates. If the Life Support NMI standing data flag is removed within MSATS, the Life Support details contained within the register should automatically be made inactive and archived.
- 4) If the NMI status is 'D' for any Life Support flagged NMI, this would enable the AER an auditing platform in relation to wrongful de-energisations of Life Support customers.
- 5) The repository should be maintained by the registration process owner, including date and status of registration, equipment details, medical practitioner details, life support contact details and the initiating Market Participant ID.
- 6) The repository should allow all associated parties to download full registration details on an ad hoc basis to enable internal reconciliation processes with host systems as needed.
- 7) The repository should have the ability to generate notifications (FTPs) to all parties when a change to records is detected.
- 8) The repository should enable data uploads of defined file format by user or FTP, such as new registrations or changes to Life Support details.

- 9) The repository should enable new FRMPs, the LNSP and incumbent FRMPs (following a failed transfer completion) to identify unvalidated / incomplete registration applications based on the current 'Registration status'.

Energy Queensland considers that this solution would assist in improving the accuracy of retailer and distributor life support registers, an issue which was highlighted in the Australian Energy Regulator's recent rule change request. This change would make the Life Support flag visible to all participants and support a more auditable reconciliation process when used in conjunction with the central repository. Validating the Life Support NMI standing data flag against the Life Support details held within the central repository would improve the accuracy of Life Support information and provide greater assurances to all participants.

Energy Queensland considers the above proposed solution would support the Australian Energy Market Commission's final strengthening protections for customers requiring life support equipment rule change by:

- Making additional Life Support details visible to all participants;
- Providing validation of registration;
- Ensuring that the Life Support flag is used for its intended purpose; and
- Allowing greater sharing of information to fulfil both distributor and retailer obligations.

Finally, Energy Queensland suggests the following for further consideration:

- That a defined escalation process is provided in the B2B Procedures.
- That a national Life Support medical certificate / registration template is created to ensure participants are covering all required details.
- That the central repository should have the ability to support other emergency and community services response teams (i.e. Police and Fire service).

Please note: The above suggestions relating to a central repository should be considered in accordance with relevant privacy obligations.

Energy Queensland would appreciate meeting with AEMO to discuss this proposed solution.