# B2B Procedures

- Service Orders
- Customer and Site Details
- Meter Data
- One Way Notification
- RoLR Part B

# Retail Electricity Market Procedures – Glossary and Framework.

## CONSULTATION

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant**: AusNet Services*

***Completion Date**: 2 December 2016*

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# 1. Service Orders

| Old Clause No | New Clause No | Comments |
|---|---|---|
| | 1.1 (Purpose and Scope) | COMMENT:<br><br>New purpose and scope section does not actually detail the purpose of the document at all – it is simply a legal statement confirming jurisdiction. An introduction is expected to the Service Order Process and why it is different from the other processes. |
| | 1.2 (Definitions and Interpretation) | NO COMMENT |
| | 1.3 (Related Documents) | NO COMMENT |
| | 1.3.1 (Exclusions) | NO COMMENT |
| | 1.3.2 (Terminology) | AusNet Services suggests the Glossary and Framework document requires further updates to ensure terminology in consistent with the new B2B Procedures.<br><br>The definition of “Service Paperwork” in the Glossary and Framework document still includes references to Service Order types used in the previous version of the B2B Procedures. |

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| | 2.1 Business Communication Process – Process Overview | COMMENT:<br><br>AusNet Services identified the following inconsistencies between the B2B Guide and the Procedures.<br><br>• Inconsistency with B2B Guide – "Temporary Isolation" subtype of Supply Service Works SO is called "Supply Isolation" in B2B Guide<br><br>• Inconsistency with B2B Guide – methods of De-en are inconsistent with B2B Guide<br><br>• Inconsistency with B2B Guide – "Change Timeswitch" subtype of Metering Service Works is not present in B2B Guide<br><br>RECOMMENDATIONS TO REDUCE COST AND IMPLEMENTATION RISK:<br><br>**<u>Service Order Type: Special Read</u>**<br><br>AusNet Services recommends adding a new Service Order Special Read subtype for *Remote On Demand Read* and *Meter Installation Inquiry*, instead of producing an entirely new B2B transaction for requesting *Remote On Demand Read* and *Meter Installation Inquiry* in the Meter Data Process. In addition to reducing the costs of system changes, re-aligning with these transactions to the Service Order Process would allow B2B parties to include a Product Code in the response. |

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| | | **Service Order Type: Miscellaneous Services**<br><br>AusNet Services strongly recommends removing Miscellaneous Service Order on the basis it creates inefficient processes. If the there is a justifiable process it should be properly defined. Typically miscellaneous Service Orders are incorrectly used to request a supply isolation. Email should suffice for bespoke requests.<br><br>RECOMMENDATION TO ADD VALUE<br><br>**Subtype: Change SwitchTime**<br><br>AusNet Services considers the change in timeswitch settings is likely to change the turn-on, turn-off, turn-on randomisation time, and turn-off randomisation time. As such, we suggest it remains "change timeswitch settings", and we suggest description and example should refer to turn-on, turn-off, turn-on randomisation time, and turn-off randomisation times.<br><br>**COMMENT**<br><br>**Service Order Type: De-energisation**<br><br>We recommend removing the following main switch seal, technical disconnect, and meter isolation sub-categories for the following reasons.<br><br>• Main switch seal is not a form of disconnection, because the main switch is not a premise isolation |

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| | | point.<br><br>• The term technical disconnect is unclear.<br><br>• It is unacceptable to isolate a supply at the meter terminals, because it leads to accessible terminal and fails ESV's safety standards. |
| | 2.1.1 Communication Process Diagrams | COMMENT<br><br>We suggest swapping swim lanes for Appointment Notification for consistency.<br><br>Please advise whether there is a capacity on the number of Notified Parties permissible. |

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| | 2.1.2 General Principles | COMMENT<br><br>Section numbering issue (see above)<br><br>2.1.1.b – Note that “Allocate NMI” is now part of Supply Service Works yet these are listed separately.<br><br>2.1.1.d – confused wording – the request is still sent to the MC, it just happens that is the same participant as DNSP<br><br>2.1.1.e – “retailer” should be “initiator”<br><br>2.1.1.f – “retailer” should be “initiator”<br><br>Also we consider additional clarification on the sequence and requirement for Notified Parties is required. That is specify which notified parties are mandatory for which Service Order types.<br><br>Clarity is required on what should happen when an Initiator or Receipient receives a rejection from a Notified Party. |

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| | 2.2 Acknowledging Receipt of the ServiceOrderRequest | RECOMMENDATION TO REDUCE COST:<br><br>AusNet Services recommends maintaining the existing practice of re-issuing a “New” SO transaction to a recipient rather than adopting the proposed action of “Resend”. The same outcome will be achieved without need to build new system functionality to manage the new type. |
| | 2.3 Service Orders Requiring Customer Consultation | NO COMMENT |
| | 2.4 Scheduled Date and Customer Preferred Date and Time | NO COMMENT |
| | 2.5 Where work will not be completed within the Required Timeframe | NO COMMENT |
| | 2.6 Raising a ServiceOrderResponse | NO COMMENT |
| | 2.7 Use of Status, Exception and Product Codes in ServiceOrderResponses | COMMENT<br><br>2.7.c – continues to use terms “Service Provider” rather than recipient. |
| | 2.8 Closing the Service Order Process | NO COMMENT |
| | 2.9 Cancelling a ServiceOrderRequest | NO COMMENT |

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| | 2.10 Updating a ServiceOrderRequest | COMMENT<br><br>The procedure states that off-market changes to Service Orders are permissible, however clarification is required to confirm whether this extends to Notified Parties. AusNet Services considers the B2B Procedures should clearly set the expectation that any off-market Service Order updates will also be manually sent to Notified Parties. |
| | 2.11 Resending a ServiceOrderRequest | COMMENT<br><br>Refer to comment for Section 2.2 regarding “Resend” action type.<br><br>Clarification should be made that in the case of a Notified Party not receiving a Service Order request, that the transaction will be re-sent only to that Notified Party and not to all parties. AusNet Services considers that this should be clear specified in the B2B Procedures, as it is important in defining B2B Communications. |
| | 2.12 Resending a ServiceOrderResponse | NO COMMENT |
| | 2.13 Service Paperwork | NO COMMENT |

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| | 2.13.1 Explanation of use of ExceptionCodes | COMMENT<br><br>Section 2.13.1 regarding ExceptionCodes is not aligned to section 2.13 regarding Service Paperwork. Exception Codes are unrelated to paperwork. Suggest remaining section 2.13 to "Common Business Practices" and renumber all subsequent sub-points.<br><br>RECOMMENDATION TO REDUCE COSTS<br><br>The proposed status "Unknown Connection Status" is no different to the status "No comms". As such, we recommend removing either status value. |
| | 2.13.2 Allocate NMI | NO COMMENT |
| | 2.13.3 Re-energisation | NO COMMENT |
| | 2.13.4 De-energisation | NO COMMENT |
| | 2.13.5 Special Read | NO COMMENT |
| | 2.13.6 Supply Abolishment | NO COMMENT |

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| | 2.13.7 Multiple Service Orders | RECOMMENDATION<br><br>AusNet Services considers that it is important that these rules for multiple Service Orders are maintained in order to ensure the Communications Protocol remains defined and should not be removed on the basis of the IEC Directive. This is because having multiple Service Orders rules in an enforceable instrument enables participants to automate Service Order transaction handling. |
| | 2.13.7.1 Multiple Service Orders for Multiple Retailers | NO COMMENT |
| | 2.13.7.2 Scenario Process Description - Scenarios 1 –6 | NO COMMENT |
| | 2.13.7.3 Scenario Process Description - Scenario 7 | NO COMMENT |
| | 2.13.7.4 Scenario Process Description - Scenario 8 | NO COMMENT |
| | 2.13.7.5 Scenario Process Description - Scenario 9 | NO COMMENT |
| | 2.13.7.6 Multiple Service Orders from Same Initiator | NO COMMENT |
| | 3 TIMING REQUIREMENTS | NO COMMENT |

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| | 3.1 Overview of Timing Requirements | COMMENT<br><br>3.1.c – incorrect reference to Figures 4 and 5 |
| | 3.2 Definition of Timing Points and Timing Periods | NO COMMENT |
| | 3.2.1 Timing Points | NO COMMENT |
| | 3.2.2 Use of Timing Periods | COMMENT<br><br>Business Acceptance /Rejection for Requests – “escalate non-receipt” should be “escalate non-acceptance/rejection” |
| | 3.3 Specific Timing Requirements | COMMENT<br><br>References to “Service Provider” rather than “Recipient” or “DNSP”. |
| | 3.3.1 Timing Requirement for BusinessReceipts for Requests | NO COMMENT |
| | 3.3.2 Timing Requirement for BusinessAcceptance/Rejection for Requests | NO COMMENT |

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| | 3.3.3 Timing Requirement for Completion of the Requested Work | COMMENT<br><br>Meter Investigation: The text implies that a DNSP in NSW can replace a defective meter if it is deemed to be failed. We understand that is not correct.<br><br>AusNet Services considers that Metering Contestability has introduced a separation of works that is new for the mass market. There are no timeframes for allocate NMI and metering service requests for meter replacement. Therefore, it is prudent that each regulator review the service levels for metering installations and NMI allocations are appropriate. |
| | 3.3.4 Timing Requirement for Issuing a ServiceOrderResponse | NO COMMENT |
| | 3.3.5 Timing Requirement for BusinessReceipts for Responses | NO COMMENT |
| | 3.3.6 Timing Requirement for BusinessAcceptance/Rejection for Responses | NO COMMENT |
| | 4 Transactions | |
| | 4.1 ServiceOrderRequest Transaction Data | COMMENT<br><br>Notified Party ID is listed as “M/N” when it should be O as it is in section 4.3. |

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| | | Notified Party ID is a repeatable field that allows every party knows of every other party. This allows the recipients to send acceptance and rejections to notified parties. Seems that these should be individual messages. This is a matter for the B2B Procedure: Technical Speciation.<br><br>The new LifeSupport field in the Service Order transaction is only relevant to ServiceOrders that interrupt the supply. Hence we consider the classification of M is not always appropriate and it should be classified as R.<br><br>AusNet Services is concerned that the field MaximumDemand will be misused as defined. It should only relate to rating that the Registered Electrical Contractor assigns when they wiring (or modify) the premises and install the Circuit Breaker. It should never be provided as part of a Metering Service Works request. We suggest the following alterations:<br><br>• Maximum demand (in kw) "should be the quantity specified by the Registered Electrical Contractor (REC) relevant to the premise, and "in accordance with Australian Standards AS3000 (calculated at 240V).<br><br>• Additionally we recommend changing the Maximum demand row to change "Metering Service Works" to only be N (Not Required). |

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| | 4.2 ServiceOrderResponse Transaction Data | COMMENT<br><br>The B2B Procedures should define how many resend attempts can be made, as a matter relevant to understanding the communication protocol. |
| | 4.3 ServiceOrderAppointmentNotification Transaction Data | NO COMMENT |
| | 4.4 BusinessAcceptance/Rejection Transaction Data | NO COMMENT |
| | 4.4.1 Applicable Events and their EventCodes | RECOMMENDATION TO REDUCE COSTS:<br><br>AusNet Services observes that the event “No Contract” is the same as “Initiator Is Not Permitted To Raise This Service Order Type”, hence we recommend consolidating and removing one of the events.<br><br>Similarly, “No Metering” is the same as “No Meter At Site”, hence we recommend consolidating events into the one events, but allow a Warning and/or an Error.<br><br>Also the event “Missing Service Paperwork” and “Service Paperwork Required” hence we recommend removing one of the events. |

# 2. CSDN

| Old Clause No | New Clause No | Comments |
|---|---|---|
| | 1.1 Purpose and Scope | COMMENT<br><br>New purpose and scope section does not actually detail the purpose of the document at all – it is simply a legal statement confirming jurisdiction. The introduction is expected to the CSDN Process and why it is different from the other processes. |
| | 1.2 Definitions and Interpretation | NO COMMENT |
| | 1.3 Related AEMO Documents | NO COMMENT |
| | 2 CUSTOMER & SITE DETAILS PROCESS | NO COMMENT |
| | 2.1 Process Diagrams | NO COMMENT |
| | 3 TIMING REQUIREMENTS | NO COMMENT |

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| | 3.1 Definition of Timing Points and Timing Periods | NO COMMENT |
| | 3.2 Other Timing Requirements | NO COMMENT |
| | 4 BUSINESS RULES | NO COMMENT |
| | 4.1 Common Business Rules for Notifications | NO COMMENT |
| | 4.2 Customer Details Request | NO COMMENT |
| | 4.3 Customer Details Notification | NO COMMENT |
| | 4.3.1 Initiating a Customer Details Notification | NO COMMENT |

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| | 4.3.2 Life Support | RECOMMENDATION TO REDUCE IMPLEMENTATION COSTS AND RISK<br><br>AusNet Services notes the AER is working on a NERR Rule change request regarding Life Support. This Rule change will clarify Life Supports requirements and in doing provide a Head of Power requiring the provision of the information that has been proposed in this initial draft B2B Procedure CSDN process. Further we expect the Rule change will outline a timeframe for confirming Life Support, this will certainly result in further changes to the Life Support processes.<br><br>The initial B2B Procedures have added a number of fields related to Life Support including Life Support specific fields including:<br><br>LifeSupport (as opposed to SensitiveLoad), ContactName, PatientName, Address, Phone numbers, EmailAddress, LifeSupportEvidence, and LifeSupport Equipment.<br><br>Whilst we agree with the improvements in this section and the addition of the information, it is simply not justifiable to change Life Support processes as part of the Metering Contestability program only update it again after the AER has made its changes. Further the AER Rule change would provide a clear Head of Power to send this additional information via B2B Communications. As such we recommend deferring this change until after the AER initiated Rule change concludes. |
| | 4.3.3 Sensitive Load | NO COMMENT |

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| | 4.3.4 Vacant Sites | NO COMMENT |
| | 4.4 Customer Details Reconciliation | NO COMMENT |
| | 4.5 Site Access Request | Refer to AusNet Services comments on section 4.7 |
| | 4.6 Site Access Notification | Refer to AusNet Services comments on section 4.7 |

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| | 4.7 Pre-Installation Data Request | RECOMMENDATION TO REDUCE IMPLEMENTATION COSTS AND RISK<br><br>AusNet Services believes that the *PreInstallationDataRequest* and *PreInstallationDataResponse* can be consolidated within the existing Customer and Site Details Procedure under the *SiteAccessRequest* and *SiteAccessNotification,* and therefore the new Pre-Installation Data transactions are not required.<br><br>Utilising the existing transactions would result in a common method for participants to ask and be notified with information relating to the conditions of an installation and avoids the duplication of processes to address access and hazards. Adding transactions for *PreInstallationData* would be unnecessarily complex and costly to implement.<br><br>Given that multiple parties that will now attend a physical connection this provides a more consistent method to exchange installation and safety related information. With this shift in market operation it is no longer just the retailer who should be notifying participants where they identify a potential change in site conditions. To facilitate this, the *SiteAccessRequest* could be augmented to include a *RequestedData* indicator to identify if the initiator required *existing defects* and *meter location* information.<br><br>Addressing the question raised in the Consultation Paper we consider it is appropriate to allow the sending of *SiteAccessNotifications* as a stand alone transaction, without necessarily requiring a *SiteAccessRequest.* |

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| | 4.7.1 PreInstallation Process | Refer to AusNet Services comments on section 4.7 |
| | 5 TRANSACTIONS | |
| | 5.1 CustomerDetailsRequest | Please refer to our recommendation 4.7 |
| | 5.2 CustomerDetailsNotification | Please refer to our recommendation 4.7 |
| | 5.3 SiteAccessRequest | COMMENT<br><br>As also highlighted in comments to section 4.7 and 5.5 we recommend adding a field *RequestedData* indicator to request *existing defects* and *meter location* information.<br><br>AusNet Services strongly supports the provision of the Email Address in the Customer Details Notification on the basis that email has become a valuable communications channel in contacting customers and many retailers already provide email listings to us through bi-lateral arrangements. Having email addresses provided through B2B CSDN transactions would greatly improve our ability to inform our customers of both planned and unplanned outages. |

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| | 5.4 SiteAccessNotification | COMMENT<br><br>As also highlighted in comments to section 4.7 and 5.5 we recommend adding fields for *existing defects* and *meter location* information.<br><br>We also recommend making the 'Access Detail' and 'Hazard Description' fields longer, at least 160 characters. Also, we recommend allowing abbreviations. |

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| | 5.5 PreInstallationDataRequest | As also highlighted in comments to section 4.7 AusNet Services believes that the *PreInstallationDataRequest* and *PreInstallationDataResponse* can be consolidated within the existing Customer and Site Details Procedure under the *SiteAccessRequest* and *SiteAccessNotification,* and therefore the new Pre-Installation Data transactions are not required.<br><br>AusNet Services considers the PreInstallationDataResponse is a transaction that provides details that are either:<br><br>• already in MSATS and available to the FRMP initiating the Metering Service Works (i.e. Load Type, Supply Phases, Generation Type, Transformer Type, CT Ratios, Network Tariff, Primary Voltage), or<br><br>• are request able with SiteAccessRequest (i.e. Meter Location, AccessDetails, HazardDescription), or<br><br>• Inappropriate to be provided because qualified person doing the work must identify the energisation status and existing defects as part of their minimum safety requirements.<br><br>We consider that there is no need for a PreInstallationDataRequest. Parties would just be providing the same information that is in MSATS to the initiator and doing so would be inefficient. Hence we recommend removing the PreInstallationDataRequest/Response from the B2B Procedures: CSDN Process and augmenting the *SiteAccess* transactions to include *existing defects* and *meter location* information. |

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| | 5.6 PreInstallationDataResponse | Refer to AusNet Services comments on section 5.5 |

# 3. Meter Data

| Old Clause No | New Clause No | Comments |
|---|---|---|
| | 1 INTRODUCTION | NO COMMENT |
| | 1.1 Purpose and Scope | NO COMMENT |
| | 1.2 Definitions and Interpretation | NO COMMENT |
| | 1.3 Related AEMO Documents | NO COMMENT |
| | 2 BUSINESS COMMUNICATION PROCESSES | NO COMMENT |
| | 2.1 Overview | NO COMMENT |
| | 2.2 Descriptions of Processes | NO COMMENT |
| | 2.2.1 General | NO COMMENT |
| | 2.2.2 Meter Data Notification Process | NO COMMENT |
| | 2.2.3 Provide Meter Data Process | NO COMMENT |

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| | 2.2.4 Verify Meter Data Process | NO COMMENT |
| | 2.2.5 Meter Installation Inquiry Process | NO COMMENT |
| | 2.2.6 Remote On Demand Meter Read Process | NO COMMENT |
| | 2.3 Diagrams | NO COMMENT |
| | 2.4 Timing Requirements | NO COMMENT |
| | 2.4.1 Timing Requirements for Business Signals | NO COMMENT |
| | 2.4.2 Timing Requirement for Normal Meter Data Notification Process | NO COMMENT |
| | 2.4.3 Timing Requirement for ProvideMeterDataRequest and VerifyMeterDataRequest | Refer to comment in section 3.4 |
| | 2.4.4 Timing Requirement for Meter Installation Inquiry and Remote On Demand Meter Read Requests | Refer to comment in section 3.5 |
| | 2.5 Business Rules | NO COMMENT |
| | 2.5.1 Common | NO COMMENT |

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| | 2.5.2 Meter Data Notification | NO COMMENT |
| | 2.5.3 Provide Meter Data | NO COMMENT |
| | 2.5.4 Verify Meter Data | NO COMMENT |
| | 2.5.4.1 Investigation Codes Usage | RECOMMENDATION TO REDUCE IMPLEMENTATION COSTS AND RISK<br><br>AusNet Services considers that the B2B Procedures: Meter Data Process contains excessive and unnecessary changes to the *InvestigationCodes* that are not related to the Metering Contestability, Embedded Network and Meter Exchange Process Rule changes, hence additional to the scope of the current review. These changes would result in costly system and process changes and hence they are not justifiable.<br><br>All changes to the *InvestigationCodes* (removes and additions) in the Meter Data Process are not required:<br><br>• New code *Verify/Missing Register* is not required because *InvalidStandingData* will suffice on those circumstances.<br>• New code *Require Estimate Data* is not required and has no head of power for the initiator to request it.<br>• New code Meter Churn is not required because *Require Actual Reading* or *Substitute* (or *Require Final Substitute*) should suffice. More significantly rules and timing considerations for the the Meter Churn code will present challenges in scenarios where a participant role has changed, and a participant no longer holds the |

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| | | MDP role. Automated Metering Data Management Systems would reject such PMD or VMD requests. This is not represented in the process or timing diagrams, and is likely to result in significant change to systems and the transaction codes will not be used by MDPs. Fundamentally we consider the meter churn code as proposed will not meet the intention of this change.<br><br>Therefore we recommend not making these unnecessary changes to the B2B Procedures: Meter Data Process *InvestigationCodes.* |
| | 2.5.5 Meter Installation Inquiry | NO COMMENT |
| | 3 TRANSACTIONS | NO COMMENT |
| | 3.1 ProvideMeterDataRequest | NO COMMENT |
| | 3.2 VerifyMeterDataRequest | NO COMMENT |
| | 3.3 MeterDataNotification | NO COMMENT |
| | 3.4 MeterInstallationInquiryRequest | RECOMMENDATION TO REDUCE IMPLEMENTATION COSTS AND RISK<br><br>AusNet Services recommends removing the MeterInstallationInquiry from the B2B Procedures: Meter Data Process on the basis the cost of implementing is not justifiable in its current form. However, the *Metering Installation Inquiry Data* transactions can be consolidated within the existing Service Order Procedure. |

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| | | This can be accommodated within the Special Read service order type with the addition of a new subtype new subtype for '*Meter inquiry'* would support identification of this request. Noting that the service performed will largely be governed by commercial agreements and should not be limited by the technical construction of the procedure, we recommend establishing a more generic data structure for the request and response to avoid unnecessary restriction on commercial opportunity and innovation. Utilising the existing Service Order structure will have the added benefit of reducing the effort and cost required to implement.<br><br>The MeterInstallationInquiry would be valuable if it were a mechanism to gather Power Quality data (e.g. Voltage, Current, Power Factor, and Frequency) in a way that delivered frequent recordings at exactly the same time across a group of meters. That is the measurements are time-synchronised. However this transaction does not provide this service and the services facilitated by the request transaction are of little value to distribution businesses and customers.<br><br>Average Voltage and Current may be interest to a customer but it is of no commercial value to distribution businesses because a trading interval is too long a period to average out Voltage and Current data. Further, meter events should be pushed from metering providers in order to be of value. |
| | 3.5 MeterInstallationInquiryDataResponse | Refer to AusNet Services comments on section 3.4 |

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| | 3.6 RemoteOnDemandMeterRead | RECOMMENDATION TO REDUCE IMPLEMENTATION COSTS AND RISK<br><br>AusNet Services considers that the RemoteOnDemandRead transaction does not justify a separate transaction in the B2B Procedures: Meter Data Process, and we recommend moving it to an additional Service Order Special Read subtype or removing it altogether. This would avoid the cost of designing, consulting, testing, implementing and supporting a new transaction in market.<br><br>Conceptually the concept of a RemoteOnDemandRead does not align with the existing meter data processes in the market and the Metrology Procedures. Only validated data can be provided to Registered Participants so initiators would have to wait until the next day before receiving the metering data in any case. |

# 4. OWN

| Old Clause No | New Clause No | Comments |
|---|---|---|
| | 1 INTRODUCTION | NO COMMENT |
| | 1.1 Purpose and Scope | COMMENT:<br><br>New purpose and scope section does not actually detail the purpose of the document at all – it is simply a legal statement confirming jurisdiction. An introduction is expected to the One Way Notification Process and why it is different from the other processes, and include text explaining that Service Order transactions sent to Notified Parties are also One Way Notifications. |
| | 1.2 Definitions and Interpretation | NO COMMENT |
| | 1.3 ??? | COMMENT:<br><br>Typo error |
| | 1.4 Related AEMO Documents | NO COMMENT |

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| | 1.5 Terminology | NO COMMENT |
| | 2 BUSINESS PROCESS | NO COMMENT |
| | 2.1 Message Types | NO COMMENT |
| | 2.2 Common Business Rules | NO COMMENT |
| | 2.3 Acknowledging One Way Notification transactions | NO COMMENT |
| | 3 PROCESS DIAGRAMS AND TIMING REQUIREMENTS | NO COMMENT |
| | 3.1 All Transactions | NO COMMENT |
| | 4 TRANSACTION DATA | RECOMMENDATION TO REDUCE IMPLEMENTATION COSTS AND RISK<br><br>AusNet Services strongly recommends that review and change is made to the transactional payload specification when CSV is to be used.<br><br>For example, the current drafted solution for Notice of Metering Works appears to imply a dynamic header structure with repeating repeating fields mapping to that header. This will be highly complex to solve for if this drafted transaction is correct.<br><br>For this reason we recommend the use of aseXML for any scenario where variable or dynamic data structures are required. |

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| | 4.1 Pre-Defined Notifications | NO COMMENT |
| | 4.1.1 Notification Details | NO COMMENT |
| | 4.1.2 Meter Exchange Notification | NO COMMENT |
| | 4.1.3 Network Tariff Notification | NO COMMENT |
| | 4.1.4 Planned Interruption Notification | COMMENT<br><br>AusNet Services supports the introduction of the Planned Interruption Notification One Way Transactions as drafted. |
| | 4.1.5 Meter Fault and Issue Notification Data | COMMENT<br><br>AusNet Services supports the introduction of Meter Fault and Issue notification One Way Transactions. |
| | 4.1.6 Notice of Metering Works Data | RECOMMENDATION TO REDUCE IMPLEMENTATION COSTS AND RISK<br><br>AusNet Services considers the Notification of Metering Works proposed CSV structured format is variable in nature and is therefore overly complex. B2B Parties would need to build costly systems to interprete these repeated fields. As such we strongly recommend that the Notification of Metering Works be re-designed to use a defined aseXML structure. |

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| | | COMMENT<br><br>We consider that the Notice of Metering Works transactions are largely unnecessary us as a distribution business with our AMI meters being read regularly throughout the day. CATS transactions in MSATS will provide a confirmation of meter churn and provide a firm indication that supply service works can commence. It is on this basis we suggest that Notices of Metering Works transactions can be removed from the B2B Procedures, if there is not compelling reason why other parties need these notifications.<br><br>If Notice of Metering Works transactions are established we consider there is a need to clarify the precedence of metering data sent through various transactions. With metering updates would be received via a CATS CR, a Notice of Metering Works, and a Service Order completion in a short period of time and the communications protocol does not define the which transaction takes precedence if these transactions are in conflict.<br><br>Also refer to recommendations and comments made in Section 4 and in the B2B Procedure: Service Order Process section 2.1 Business Communication Process – Process Overview |
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# 5. RoLR Part B

| Old Clause No | New Clause No | Comments |
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# 6. Glossary and Framework

| Clause | Heading | Comments |
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| 3 | GLOSSARY | “Structured Address” defined in the Glossary and Framework should be aligned fields listed in the MSATS: CATS Procedures and likewise it should make reference to AS4590. |
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# 7. Technical Delivery Specification Discussion Paper

| Clause | Item | Comments |
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| Refer to separate document | | |