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**: Red Energy and Lumo Energy*

***Completion Date**: 4 December 2016*

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1. Service Orders

Old Clause No	New Clause No	Comments
	2.1 Process Overview	Red/Lumo Energy proposes that a description of each of the de-energisation methods is provided to ensure the appropriate method is selected for the relevant work to be completed by the relevant Recipient. De-energisation Methods include: • Remote • Remove Fuse • Main switch seal / Sticker • Technical disconnect • Meter Isolation • Supply Isolation • Disconnection at pole top, pillar box or pit
	2.1 Process Overview	The current methods listed within 2.1. Process Overview are: • Remote • Remove Fuse • Main switch seal / Sticker • Technical disconnect • Meter Isolation • Supply Isolation • Disconnection at pole top, pillar box or pit The following reasons are listed within 4.1. ServiceOrderRequest Transaction Data: *ServiceOrderSubType* = De-Energisation • Remove Fuse • Remote • Main switch seal / Sticker • Meter Point Isolation • Local Meter Disconnect • Supply Isolation • Pillar-Box Pit Or Pole-Top

		• Recipient Discretion There are inconsistencies within the B2B Service Order Procedure clauses. Red and Lumo recommends that all methods within these clauses and the B2B Guide Table 1: Table of B2B Transactions and Participants are reviewed and updated for consistency amongst all procedure clauses and the guide.
	2.1 Process Overview	Recommendation that Table 1 Service Order Types and Subtypes (B2B Service Order Procedures) & Table 1: Table of B2B Transactions and Participants (B2B Guide) are combined and included in this document. The purpose of the transaction subtype and roles of the Initiator, Recipient and Notified Party will clarify the participants' roles for each of the Transaction Types and Sub Types.
	2.1.2(p)	Recommend that the use of the word 'copy' is reviewed following the Systems Working Group recommendations have been received and agreed by the B2B Working Group
	2.6 Raising a ServiceOrderRespo nse	Recommend this clause will need to be review once the Systems Working Group recommendation has been recieved and agreed by the B2B Working Group.
	2.9 Cancelling a ServiceOrderReque st	The following infers that the B2B e-Hub may not process transactions 'instantly'. (c) If the Initiator needs to cancel a Service Order urgently, this must be communicated to the Recipient by phone. If the new solution allows for instanteous transactions this clause needs to be reviewed in conjunction with the technical specifications and suggested outcomes from the Systems Working Group. Recommendation for the clause is updated to the following: (c) If the Initiator needs to cancel a Service Order urgently, this must be communicated to the Recipient ~~by phone~~ as soon as practicable.
	2.12 Resending a ServiceOrderRespo	The following is to be reviewed post the Systems Working Group recommendation for information to be provided to the Notified Party: (a) If a Notified Party or Initiator indicates the ServiceOrderResponse has not been received or delivered, the

	nse	Recipient may use the *ResponseType* 'Resend' with the same *ServiceOrderID* to resend the response.
	2.13.3 Re-energisation	This clause must include the ability for contestable providers a mechanism to use B2B Communications for the purposes of a remote re-energisation as provided for in the NER. This clause requires review with the inclusion of information and minimum requirements for a non-regulated business to enable entry and use of B2B transactions. As this clause is currently written, it limits entry for non-regulated businesses, i.e. a barrier to entry.
	2.13.4 De-energisation	This clause must include the ability for contestable providers a mechanism to use B2B Communications for the purposes of a remote de-energisation as provided for in the NER. This clause requires review with the inclusion of information and minimum requirements for a non-regulated business to enable entry and use of B2B transactions. As this clause is currently written, it limits entry for non-regulated businesses, i.e. a barrier to entry.
	2.13.4 De-energisation	Similar to the feedback provided to 2.9 Cancelling a ServiceOrderRequest, the following infers that the B2B e-Hub may not process transactions 'instantly'. (d) For a De-energisation ServiceOrderRequest for non-payment,: (iv) If the Retailer needs to cancel the ServiceOrderRequest urgently, this must be communicated to the DNSP by phone. If the new solution allows for instanteous transactions this clause needs to be reviewed in conjunction with the technical specifications and suggested outcomes from the Systems Working Group. Recommendation for the clause is updated to the following: (iv) If the Retailer needs to cancel the ServiceOrderRequest urgently, this must be communicated to the DNSP instantly ~~by phone~~ as soon as practicable.

	2.13.4 De-energisation	How will the DNSP obtain a read for type 4 & type 4A meters (non-regulated) when a physical de-energisation is completed?
	2.13.7 Multiple Service Orders	This clause will require review post the recommendation of the Systems Working Group as to how information will be provided to Notified Parties, i.e. all transactions between the Initiator and Recipient or initial, rejected, and/or completion. (e) Where there is a physical Re-energisation and De-energisation received for the same Site, Service Providers have the discretion to undertake a single meter reading instead of a physical re-energisation followed by a physical de-energisation fuse removal followed by a fuse insertion. Scenarios 1-6, detailed in section 0, allow for this practice.
	2.13.7 Multiple Service Orders	How will the DNSP obtain a read for a type 4 & type 4A meter (non-regulated) when a physical de-energisation is completed?
	4.1 ServiceOrderRequest Transaction Data	Recommendation that the circumstances/scenarios are included as to when the following reason codes are applied: Field = *De-Energisation Reason* <u>Definition</u> Code indicating the reason for De-Energisation: • Customer Requested • Move Out • Non-Payment (DNP) • Unauthorised Usage (DNI) • Illegal Usage • No Access • Safety • Defect • Site Works • Other (i.e. breach of contract / no security deposit)
	4.4.1 Applicable	The following new Business Events currently do not have a code, this will need to be updated:

	Events and their EventCodes	• Unable to perform Service Order due to communications disabled. • Unable to perform Service Order as communications does not exist. • No Metering • Missing Service Paperwork • Service Paperwork Required • Service Not Provided • No Contract

2. CSDN

Old Clause No	New Clause No	Comments
		Red/Lumo Energy recommends that Table 1 Service Order Types and Subtypes of the B2B Guide for the transaction types relevant to the Customer and Site Details Notifications are included in this document. The purpose of the transaction subtype and roles of the Initiator, Recipient and Notified Party will clarify the participants' roles for each of the Transaction Types.
	3.1 Definition of Timing Points and Timing Periods	Recommend that (c) and (d) do not specify the specific transaction, with a view to simply and rationalise both table 1 and table 2.
	3.2 Other Timing Requirements	Recommend that this clause is redrafted for clarity. Existing: (a) Where a CustomerDetailsNotification is provided in response to a CustomerDetailsRequest, the Retailer must provide the CustomerDetailsNotification within two Business Days of receiving the CustomerDetailsRequest. (b) In all other situations, the CustomerDetailsNotification and/or SiteAccessNotification must be provided within one business day of the relevant data being updated or changed. (c) Where the update is a result of a customer transfer, the trigger will be the receipt of the completion notification of the CATS Change Retailer transaction. (d) For a new connection, the trigger will be once all the following conditions have been met:

		(A) The receipt of the Supply connect or Install Meter Service Order completion notifications, (B) the receipt of the completion notification of the CATS Create or Update NMI transaction, (C) the completion notification of the CATS Create Metering transaction, and (D) where the site is energised. Refer to Timing Requirement for Sending CustomerDetailsRequests. (e) In relation to a customer transfer, the DNSP, must not send a CustomerDetailsRequest for a NMI before the Close of Business of the fifth business day following receipt of the completion notification of the CATS Change Retailer transaction. (f) In relation to a new connection, the DNSP, must not send a CustomerDetailsRequest for a NMI before the Close of Business of the fifth business day following the issuing of; a. the Service Order completion notification, b. the completion notification for the CATS Create, o; c. Update NMI transaction and d. the completion notification of the CATS Create Metering transaction, e. where the site is energised. (g) The timing requirement for *BusinessReceipts* is set out in the B2B Procedure Technical Delivery Specification (h) Timing Requirement for *BusinessAcceptance/Rejection* for Notifications is set out in the B2B Procedure Technical Delivery Specification (i) Timing requirements for the PreInstallationRequest are as agreed between the Recipient and the Initiator. Proposed: (a) Timing requirements for the <u>PreInstallationRequest, CustomerDetailsRequest</u> and <u>SiteAccessRequest</u> are as agreed between the Recipient and the Initiator. (b) The timing requirement for *BusinessReceipts* is set out in the B2B Procedure Technical Delivery Specification (c) Timing Requirement for *BusinessAcceptance/Rejection* for Notifications is set out in the B2B Procedure Technical Delivery Specification

		(d) Subject to clause (a), Retailers to provide a CustomerDetailsNotification, in response to a CustomerDetailsRequest within 2 Business Days. (e) A Retailer must send a CustomerDetailsNotification, where: (i) the relevant data is updated or changed; (ii) following the completion of a CATS Change Retail transaction; or (iii) following the completion of new connection servicer orders, all relevant CATS updates have completed, and the site has been energised. (f) A party must wait for the completion of all items under (e) prior to sending the Retailer a CustomerDetailsRequest.
	4.3.2 Life Support	Red and Lumo have been advised that the Australian Energy Regulator are intending to submit a rule change to amend the existing National Energy Retail Rules (NERR) regarding Life Support. As the existing B2B Procedures support the existing NERR requirements, we strongly object to any amendments to this transaction. Red and Lumo take life support requirements seriously, and consider that changing this process now, and potentially reworking the process/transaction to support a new rule adds risk that can be mitigated by only changing the life support processes once. We consider it prudent to await the outcome of the rule changes to the NERR prior to making any amendments to this transaction. We specifically object to the following information being included in the revised transaction: • Life Support (we consider that it should remain within the existing SensitiveLoad field) • Email Address • Account Contact Name, Postal Address, Phone Number(s), Email Address • Life Support Contact Name, LS Postal Address, Phone Numbers, Email Address • Life Support Evidence • Site Address • Life Support Equipment • Patient Name
	4.3.2 Life Support	Inclusion of another clause:

		(d) The Recipient must update their records accordingly
	4.3.4 Vacant Sites	Recommendation that the following clause is updated from: (a) If a Site is vacant, the Retailer must send a CustomerDetailsNotification containing *NMI, LastModifiedDateTime*, a *MovementType* value of 'Site Vacant' and *SensitiveLoad* of 'None' to the relevant Recipient. To: (a) If a Site is vacant, the Retailer must send a CustomerDetailsNotification containing *NMI, LastModifiedDateTime*, a *MovementType* value of 'Site Vacant' to the relevant Recipient.
	4.4 Customer Details Reconciliation	Recommend that this clause is redrafted for clarity. Existing: (a) Participants must conduct a reconciliation of Customer and Site Details for NMIs with Life Support Customers by NMI on a regular basis as agreed between Participants. Unless otherwise agreed by the affected Participants, the Timing Requirements for the use of the CustomerDetailsReconciliation transaction and its Business Signals must be initiated and processed at least four times per a year, during the months of January, April, July and October. (b) Where agreed between Participants, the Customer Details Reconciliation Process may be conducted more frequently or in different months to those specified. (c) The Retailer must conduct the Customer Details Reconciliation with the DNSP and if requested by the MC or MPB, the Retailer must conduct the Customer Details Reconciliation within agreed timeframes. The CustomerDetailsReconciliation must use the CustomerDetailsNotification with MovementType of 'Reconciliation'. (d) The use of BusinessAcceptance/Rejections for the CustomerDetailsReconciliation will be a subset to that used for the CustomerDetailsNotification. The DNSP can only reject for reasons as specified in table 8. If the DNSP finds an issue with the customer data other than the Life Support flag provided in the CustomerDetailsReconciliation, the DNSP must use the CustomerDetailsRequest process in this Procedure. (e) The Retailer and DNSP must agree the timing of the Customer Details Reconciliation. Some considerations for this agreement are listed in the B2B Guide. For NMIs provided by the Current

		Retailer in the CustomerDetailsReconciliation transaction(s) that are not flagged by the DNSP, MC or MPB as having Life Support, the DNSP, MC or MPB must accept the transaction(s) and update its records accordingly with Life Support. (f) NMIs in the Recipient's system flagged with Life Support, but not provided by the Retailer in the Customer Details Reconciliation, the Recipient's must send a CustomerDetailsRequest using the Reason value 'Rec – confirm no LifeSupport' within 2 business days of receiving the last CustomerDetailsReconciliation transaction. (g) If no CustomerDetailsRequests with Reason value 'Rec – confirm no LifeSupport' have been received by the Current Retailer from the Recipient after 2 business days of sending the last CustomerDetailsReconciliation transaction, the Customer Details Reconciliation is considered to have been completed (h) The Current Retailer must validate whether a customer at a NMI has Life Support and provide the Recipient with a CustomerDetailsNotification within 5 business days of receiving a CustomerDetailsRequest with Reason value 'Rec – confirm no LifeSupport' (i) A CustomerDetailsReconciliation transaction does not replace the requirement for the Notification of Customer Details Changes, as described required in the CustomerDetailsNotification process. Proposed: (a) Retailers and DNSPs must conduct a reconciliation of Customer Details for NMIs with Life Support by NMI on a regular basis. (b) Unless otherwise agreed by the affected Participants, the Timing Requirements for the use of the CustomerDetailsReconciliation transaction must be initiated and processed at least four times per a year, during the months of January, April, July and October. (c) The Retailer must conduct the Customer Details Reconciliation with other Recipients as agreed. (d) The CustomerDetailsReconciliation must use the CustomerDetailsNotification with *MovementType* of 'Reconciliation'. (e) The use of *BusinessAcceptance/Rejections* for the CustomerDetailsReconciliation will be a subset to that used for the CustomerDetailsNotification. The DNSP can only reject for reasons as specified in table 8. If the DNSP finds an issue with the customer data other than the Life Support flag provided in the CustomerDetailsReconciliation, the DNSP must use the CustomerDetailsRequest process in this Procedure.

		(f) For NMIs provided by the Current Retailer in the CustomerDetailsReconciliation transaction(s) that are not flagged by the Recipient as having Life Support, the Recipient must accept the transaction(s) and update its records accordingly with Life Support. (g) Where a NMI in the Recipient's system flagged with Life Support, but not provided by the Current Retailer in the CustomerDetailsReconciliation, the Recipient's must send a CustomerDetailsRequest using the *Reason* value 'Rec – confirm no LifeSupport' within 2 business days of receiving the last CustomerDetailsReconciliation transaction. (h) If no CustomerDetailsRequests with Reason value 'Rec – confirm no LifeSupport' have been received by the Current Retailer from the Recipient after 2 business days of sending the last CustomerDetailsReconciliation transaction, the Customer Details Reconciliation is considered to have been completed. (i) The Current Retailer must validate whether a customer at a NMI has Life Support and provide the Recipient with a CustomerDetailsNotification within 5 business days of receiving a CustomerDetailsRequest with *Reason* value 'Rec – confirm no LifeSupport' (j) A CustomerDetailsReconciliation transaction does not replace the requirement for the Notification of Customer Details Changes, as described required in the CustomerDetailsNotification process.
	5.6	Recommend that the following is included in the PreInstallationDataResponse transaction: HazardDescription has the following fields added: • Asbestos Fuse • Asbestos Board Recommend that a new Field is added to provide Isolation information.

3. Meter Data

Old Clause No	New Clause No	Comments
	1.3	Recommend including the Service Level Procedures for MDPs on the list of Related Documents.
	2.2.4(d)	Recommend that previous wording is reinstated in this sub-clause, as it is clearer regarding a field visit. Draft new clause: (d) Upon receipt of a VerifyMeterDataRequest, a Recipient must use reasonable endeavours to verify the MDFF Data which is the subject of the Initiator's VerifyMeterDataRequest. The required verifications consists of a desktop re-validation of the MDFF Suggested change: (d) Upon receipt of a VerifyMeterDataRequest, a Recipient must use reasonable endeavours to verify the MDFF Data which is the subject of the Initiator's VerifyMeterDataRequest. The required verifications consists of a ~~desktop~~ re-validation of the MDFF without the requirement to perform a field visit. Existing Procedure: d. Upon receipt of a VerifyMeterDataRequest, a MDP must use reasonable endeavours to verify the MDFF Data which is the subject of the Participant's VerifyMeterDataRequest to that Participant. The verification process is re-validation of the data that is held in the MDP's systems without an obligation to perform a field visit.
	2.5.4.1 Table 4 **Investigation Code Explanations**	Recommend that a Verfiy High Reading and Verify Low Reading amend the wording as follows. Remove: The verification required is desktop only. Replace with: The verification required does not involve a field visit.
	2.5.5(a)	Recommend removing this clause, as it will be dictated by contractual arrangements how frequently a participant can request a Meter Installation Inquiry.

	2.5.6(a)	Recommend removing this clause, as it will be dictated by contractual arrangements how frequently a participant can request a Remote On Demand Meter Read.
	3.5 Table 9	Red and Lumo recommend tha this clause includes the current read. Additionally, we recommend the definition of *Events* is amended as follows: Events that have been recorded in *meter* log (or logs) including recorded information in the tamper detection alarm, reverse energy flow alarm and *metering* device temperature alarm. ~~Minimum~~ Event types that must be returned are: • Tempreature alarm • Generation Detected • Under voltage • Over voltage • Tamper • Over current Mandatory where Meter Event Retival or All of the Above Inquiry Code is used. Other Event types may be returned where agreed.

4. OWN

Old Clause No	New Clause No	Comments
	4(a)	Recommend that the first sentence is deleted as it is duplicated from 1.3
Stef T330	4.1.4 Figure 6 Planned Interruption Notification field values	Red and Lumo consider that the transaction as proposed does not meet the requirements specified in the NERR, which requires retailers to: "specify the expected date, time and duration of the retailer planned interruption". We recommend that the transaction is amended to contain the following fields (as mandatory unless specified): • Record indicator • Record Numer

		• Message Name • Version • NMI • NMI Checksum • Expected outage date • Expected outage start time • Duration of outage • Reason for outage (Optional) We consider the existing transaction difficult to populate with our experience in deploying meters to date.
	4.1.5 Figure 7 Meter Fault and Issue Noficiation Field Values	Recommend that this transaction also includes Meter ID so that where there are multiple meters on site, the particular meter/device can be easily identified. Recommend that the reasons are amended as follows: • Timeswitch/Controlled Load Failure – Used when a timeswitch has failed ~~and a controlled load is required to be managed through a meter~~. • Contactor Failure – Used when a load contactor has failed ~~and a controlled load is required to be managed through a meter~~. Theses reasons are drafted in a manner that pre-determines a contractual discussion/outcome.
	4.1.6	Recommend that the Field 'METERPHASE' is consistent with the Preinstallation Transaction Field. This procedure has 'Single Phase' the other has '1 Phase' Recommend that the Field 'LOADTYPE' also includes 'Network Device' as an allowable field. Recommend that the Field 'NETWORKDEVICELOATION' omits the position of 'Before Meter'.
	4.2 Figure 9 Business Accept/Reject Codes.	Recommend that the Defintiion of the field Status points only to Figure 11. As all Event Details are valid values for this acknowledgement.

	4.2	There is inconsisentency among all procedures – CSDN and SO are the same / OWN and MDN are the same. Reccommendation that SO and CSDN be changed to align with OWN and SO to include the Status field description, or alternatively if all are consistent should these all be moved to the B2B guide.

5. RoLR Part B

Old Clause No	New Clause No	Comments
	51.3.1	See Red and Lumo's comments on the CSDN Procedure changes relating to the Customer and Site Details transactions being amended. We request that the outcome of this is reflected in this clause.

6. Glossary and Framework

Clause	Heading	Comments

Other feedback (from the consultation paper):

Do the content and the structure of the Service Order Transactions meet industry needs?	See comments above.
Who has the obligation(s) in an Embedded Network to notify any relevant participant(s) of Life Support?	This is outside the scope of the B2B framework given that it does not have an associated Rule obligation. We consider that this needs to be addressed by a rule change. We understand that there is a gap in the existing Rules, and there are issues with customers who have life support within embedded networks and finding the embedded network operator. Until such time that a rule change is submitted, we think that the parent NMI must be flagged as life support to protect the customer(s) within that network.

How do participants communicate customer Life Support information in an Embedded Network?	Consistent with current industry practice.
Are B2B communications required? Note: The Emebedded Network Operator (ENO) is not required to be a B2B Participant.	We consider that this should be addressed as a part of the AER's rule change.
Should the SiteAccessNotification be available for parties related to a NMI to send new or upadetd site hazards and access details?	In practice, both the distributor and metering providers will maintain registers of hazards and access issues for their WHSE.
Which participant(s) should be considered the 'master of record' holder for this information?	We consider that over time, this will be the metering provider, however, we understand that all parties will maintain their own register of hazards and access issues.
Should the Remote on Demand Meter Read be included in the Meter Data Process or the Service Order process? Remote On Demand Meter Read	Service order
Should the Meter Installation Inquiry be included in the Meter Data Process or the Service Order process? Metering Installation Inquiry Request/Response	Service order