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B2B RoLR Procedures v2.4 Consultation

28 February 2023

Draft Report

Proposed Changes

Retailer of Last Resort

For Official use only

Notice of consultation

Date of Notice: 28 February 2023

This Notice of First Stage of rules Consultation (Notice) informs all Business-to-Business (B2B) Parties, relevant B2B Change Parties, AEMO and such other persons who identify themselves to the Information Exchange Committee (IEC) as interested in the B2B Procedures (Consulted Persons) that AEMO is conducting a consultation (Consultation) on the B2B Procedures (on behalf of the IEC).

The Consultation is being conducted under clause 7.17.4 of the National Electricity Rules (NER), in accordance with the Rules consultation requirements in NER 8.9.

Matters under consultation

The changes (Changes) which are proposed (Proposal) are intended to:

- Enhance the Retailer of Last Resort (RoLR) B2B Customer Details Report provided by the failed/suspended retailers to the RoLR.
- Correct identified errors in the NEM RoLR Processes (Part B) Procedure; and
- Address gaps in obligations on the treatment of inflight work requests where the work is being undertaken by a non-LNSP service provider.

The consultation process

The IEC invites written submissions on the matters under consultation, including any alternative or additional proposals which you consider may better meet its objectives, as well as the national electricity objective in section 7 of the National Electricity Law.

Submissions in response to this Notice should be sent by email by 5:00pm (AEST) on 29 March 2023 to NEM.Retailprocedureconsultations@aemo.com.au. A response template has been provided on AEMO's website. Please send any queries in respect of the Consultation to the same email address.

Submissions received after the closing date and time will not be valid. The IEC is not obliged to consider late submissions for this reason. A late submission should explain the reason for lateness and the detriment to the proponent if the IEC does not consider the submission.

Please identify any parts of your submission which you wish to remain confidential, explaining why. The IEC has asked AEMO to manage such information to avoid any confidentiality issues. Any confidential information will have a de-identified analysis to the IEC and Business-to-Business Working Group (B2B-WG), to enable their decisions to be made impartially. The IEC may still publish that information, if it does not consider it to be confidential, but will consult with you before doing so. Please note that material identified as confidential may be given less weight in the decision-making process than material that is published.

In your submission, you may request a meeting with the IEC to discuss the matters in the Consultation, stating why you consider a meeting is necessary or desirable. If appropriate, meetings may be held jointly with other Consulted Persons. The IEC will generally make details of matters discussed at a meeting available to other Consulted Persons and may publish them, subject to confidentiality restrictions.

Table 1 Summary of consultation stages

Process Stage	Date
Publication of Draft Report and Determination (Draft Report)	28 February 2023
Closing date for submissions in response to Draft Report	29 March 2023
Publication of Final Report and Determination (Final Report)	26 April 2023

The IEC developed the Changes in the interests of improving the B2B Procedures. The Changes were recommended to the IEC by the members of the B2B-WG.

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1 Background

This Draft Report has been prepared to detail the Proposal. The Changes have been developed under the IEC's power to manage the ongoing development of the B2B Procedures as contemplated by NER 7.17.7(a)(2), as well as to implement the process under NER 7.17.4.

This Draft Report also provides information which is considered by the IEC in determining whether to implement the Changes to the B2B Procedures, namely:

- An issues statement in respect of the Proposal (see section 1.1).
- A summary of the Changes, including consideration of the B2B Principles (see sections 1.1 and 2.4).
- A consideration of the B2B factors (see section 2.5).

The Changes have been considered and recommended by the members of the B2B-WG.

As the proposed changes are not expected to have any system impacts to AEMO or other market participants, except the suspended retailer, the IEC is conducted this consultation under the expedited rules consultation procedure.

If any person considers the Proposal is not a Non-material Proposal, the person may request the IEC to use the standard rules consultation procedure instead of the expedited rules consultation procedure. A request under this paragraph (procedure change request) must:

(1) be in writing;

(2) contain reasons why the person considers the Proposal is not a Non-material Proposal, and may contain other reasons why the person considers the consulting party should use the standard rules consultation procedure; and

(3) be sent to the consulting party within 10 business days of the date the consulting party publishes the draft report under paragraph (a).

1.1 Issues statement and scope

The IEC has developed the Changes to improve the functionality of RoLR B2B transactions, as well as to incorporate routine communication between electricity retail market participants into B2B transactions. The Changes were recommended to the IEC by the members of the B2B-WG.

The members of the B2B-WG are as follows:

Table 2 B2B-WG members by sector

Retailers	Distributors	Metering Service Providers
AGL	AusNet Services	IntelliHUB
Alinta Energy	Energy Queensland	PlusES
Origin Energy	Endeavour Energy	Yurika
Red Energy and Lumo Energy	SA Power Networks	Vector AMS
	TasNetworks	

The Changes to the relevant B2B Procedures are:

- Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'
- Update of in-text referencing errors in section 104.5 (b) and some errors more broadly in certain subclauses of the procedure.
- Update of obligations in section 104.4 and 104.5(b)(i) on the treatment of inflight work requests undertaken by a non-LNSP service provider.

1.2 Proposed Consultation plan

The proposed consultation plan is as follows:

Table 3 Plan

Stage	Start Date	End Date
Participant submissions to be provided to AEMO	28 February 2023	29 March 2023
Closing date for submissions in response to Draft Report	29 March 2023	
IEC to consider all valid submissions and prepare Final Report and Determination (Final Report), including change-marked Procedures	29 March 2023	26 April 2023
Publication of Final Report	26 April 2023	

2. Proposed Changes

2.1 Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'

Energy markets have experienced several RoLR events since May 2022 and given the current challenges with price volatility and other factors contributing to cost pressures, it is highly likely that subsequent RoLR events will occur.

AEMO's NEM RoLR Processes Part-B, provides information for the sharing of information during a RoLR event. Table 102-A 'Customer and Site Details to Provide to RoLR' is a report that is provided by the suspended retailer to the RoLR, and it contains customer information to enable account creation for the transferred customers. The B2BWG has identified gaps in the current file format prescribed in table 102-A that requires to be amended/enhanced due to the following reasons:

- Some of the key fields that helps the RoLR setup the customer account and be able to service the customer in an effective manner, e.g., hardship indicators, life support, etc. are not included in the report, which could lead to a potential non-compliance risk for the RoLR,

- Some of required fields included in the table, e.g., Date of Birth should be mandatory, and

- Some of the fields refer to retired fields of the 'CSDN Procedure' e.g., 'Rebate' and 'Pension card' fields that are no longer in the CSDN Procedures (they used to be in pre-2017 versions) that needs to be corrected.

During the recent RoLR events, RoLRs were required to source account creation information via the suspended retailer's administrators and/or via a request energy regulator (the AER, the ESCV) and the Distributor. This highlighted that the current table 102-A does not adequately support all fields required to appropriately serve the customer transferred to the RoLR.

Based on the accumulated learnings from the recent RoLR events, the B2BWG recommended several amendments to table 102-A including (not limited to) Customer Type (Large, Small or SME), ABN/ACN, Solar – Y/N, Hardship – Y/N and Life Support Status.

2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure

Version 2.3 of the NEM RoLR Processes (Part B) require changes to some of the in-text referencing in section 104.5 as errata changes. While reviewing these clause references, it was observed that some of the subclauses in section 104.4 need to be broadened to non-LNSP service providers, in addition to the LNSPs.

2.3 Questions

To enable the determination of the preferred option, the IEC has requested respondents to answer the following questions. Please identify any parts of your submission that you wish to remain confidential and explain why. The IEC has asked AEMO to manage such information to avoid any confidentiality issues. Any confidential information will have a de-identified analysis to the IEC and B2B-WG, to enable their decisions to be made impartially.

Question 1:	Do you support the proposed changes with regards to RoLR Procedures table 102-A? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")
Question 2:	Do you support the proposed changes with regards to RoLR Procedures table section 104.4? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")
Question 3:	Do you support the proposed changes with regards to RoLR Procedures table section 104.5? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")
Question 4:	Do you support the proposed procedure effective date of 1 May 2023? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")

2.4 B2B Principles

The IEC considers that this B2B Draft Report supports each of the B2B Principles, as follows:

B2B Principle	Justification
B2B Procedures should provide a uniform approach to B2B Communications in participating jurisdictions.	The Changes, in terms of transactions, are not jurisdiction-specific, therefore do not create any jurisdictional differences.
B2B Procedures should detail operational and procedural matters and technical requirements that result in efficient, effective and reliable B2B Communications.	The Changes are expected to: - Improve the communications and operational processes between participants through the development of complete and consistent information exchange. - Ensure that the suspended retailer can provide customer information as per AEMO's procedural specification and not be pursued for additional customer information by the RoLR. - Ensure that customer information is not required to be sourced from other parties, including Distributors, AER, ESCV or the administrators
B2B Procedures should avoid unreasonable discrimination between B2B Parties.	The Changes do not introduce changes that would discriminate between B2B Parties, as the changes are either optional or apply equally across all parties.
B2B Procedures should protect the confidentiality of commercially sensitive information.	The Changes do not introduce changes that would compromise the confidentiality of commercially sensitive information.

2.5 B2B Factors

The IEC has determined that the B2B Factors have been achieved as follows:

B2B Factors	Justification
The reasonable costs of compliance by AEMO and B2B Parties with the B2B Procedures compared with the likely benefits from B2B Communications.	The Changes will: - Ensure continued compliance by AEMO and B2B Parties with the NER - Ensure appropriate consumer protections - Ensure consistency between B2B Communications and business practices - Provide clarity to non-LNSP service provides on their obligations related to Service Order related requirements during a RoLR event - Correct clause references to avoid ambiguity by participants while following procedural requirements - Not require a schema change to introduce the new fields in table 102-A - Have no expected impact to AEMO or other market participants
The likely impacts on innovation in and barriers to entry to the markets for services facilitated by advanced meters resulting from changing the existing B2B Procedures.	The Changes: - Do not impose barriers to innovation or market entry. - Allow participants to streamline their operations to better meet regulatory requirements and allow for all relevant information to be contained within the Communications structure to allow for more efficient processes. - Supports prompt, seamless and accurate customer account creation, thereby enhancing the customer's experience.
The implementation timeframe reasonably necessary for AEMO and B2B Parties to implement systems or other changes required to be compliant with any change to existing B2B Procedures.	The Changes are not expected to require system changes to the B2B e-Hub or market participant systems. From a business process perspective, the IEC is requesting feedback on the nominated implementation timeframe.

3. B2B Proposal

The Change in the Proposal is detailed within the attached change marked B2B Procedures which are published with this Issues Paper.

Glossary

This Issues Paper uses many terms that have meanings defined in NER. The NER meanings are adopted, unless otherwise specified.

Term	Definition
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
B2B	Business-to-Business
B2B-WG	Business-to-Business Working Group
CATS	Consumer Administration and Transfer Solution
CSDN	Customer and Site Details Notification
CSV	Comma Separated Value
DNSP	Distribution Network Service Provider
ESCV	Essential Services Commission of Victoria
FRMP	Financially Responsible Market Participant
IEC	Information Exchange Committee
LNSP	Local Network Service Provider
MC	Metering Coordinator
MCPI	Metering Coordinator Planned Interruption
MFIN	Meter Fault and Issues Notification
MP	Metering Provider
MPB	Metering Provider – Category B
MSATS	Market Settlements and Transfers Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERL	National Energy Retail Law
NMI	National Metering Identifier
NOMW	Notice of Metering Word
NP	Notified Party
NPN	Notified Party Notification
NSW	New South Wales

Term	Definition
OWN	One Way Notification
POC	Power of Choice
SO	Service Order