ERGON. ENERGY
RETAIL

825 Ann Street, Fortitude Valley QLD 4006
PO Box 264, Fortitude Valley QLD 4006

ergon.com.au

Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Sent by email

Re: Power of Choice – B2B Procedure Changes

Dear Sir/Madam,

Ergon Energy Queensland Pty Ltd (EEQ) welcomes the opportunity to provide this submission to the Australian Energy Market Operator (AEMO) on its Power of Choice – B2B Procedure Changes first stage of consultation.

EEQ is a proud Queensland business that provides electricity to more than 700,000 regional homes and businesses. EEQ's retail business is part of the Energy Queensland Limited group which is Australia's largest energy business.

EEQ has provided detailed responses to individual elements of the B2B Draft Processes and B2B Guide (Attachments 1 and 2). In particular, EEQ has provided more extensive comments around the proposed new life support processes including:

1. The need to clarify the obligations on a retailer where a life support customer transfers to another retailer. Specifically, at which point does the obligation to act as the 'database of record' end for the current retailer and become the responsibility of the new retailer; and
2. The proposed email / phone process of communicating changes between market participants for life support customers should be completed via market notifications to reduce risk of errors.

If you have any questions regarding this submission please contact Michelle Norris on (07) 3851 6222 or alternatively Gareth Morrah on (07) 3851 6823.

Yours sincerely

Mark Williamson
A/ Executive General Manager, Retail
Ergon Energy Queensland

Attachment 1

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**: Ergon Energy Queensland (EEQ) - retailer*

***Completion Date**: 1 December 2016*

Table of Contents

1. Service Orders 3
2. CSDN 5
3. Meter Data 9
4. OWN 10
5. RoLR Part B 12
6. Glossary and Framework 12

1. Service Orders

Old Clause No	New Clause No	Comments
Process Overview	2.1 Process Overview – Table 1 – *Service Order Types and Subtypes*	*EEQ editorial comment* – in the description of use column for the meter investigation, remove the 'a' from the first sentence
Where work will not be completed within the Required Timeframe	2.5 (g) - Where work will not be completed within the Required Timeframe	*EEQ editorial comment* – in third line separate the 'Initiator' and 'to' in the sentence.
Re-energisation	2.13.3 (h) - Re-energisation	*EEQ editorial comment* – in the second sentence remove either the first or second word ' they it'.
Re-energisation	2.13.3 (g & h) - Re-energisation	These subsections suggest that there should be ServiceOrderSubtypes for re-energisation. There are no ServiceOrderSubtypes for re-energisation listed in the Table of B2B Communications (Table 1).
ServiceOrderRequest Transaction Data	ServiceOrderRequest Transaction Data - 4.1 - Figure 11 – *Transaction Table*	In field ServiceOrderSubtype – Definition column – Special Read – there is not subtype 'blank' defined in this table. However, in the B2B Guide – Table of B2B Communications, there is a Special Read subtype blank listed. Please make consistent in both documents.

Resending a ServiceOrderRequest and Resending a ServiceOrderResponse	2.11 - Resending a ServiceOrderRequest and 2.12 Resending a ServiceOrderResponse	EEQ suggests that for the new service order of 'resend' that an overview diagram of the process should be provided in this document including the exchanging of the acknowledgements between all parties.
Specific Timing Requirements	3.3 - Specific Timing Requirements - Figures 9 - Notice Period Table	Table 9 – timeframes in regional Queensland (where Ergon Energy is the distributor) are associated with the type of feeder (e.g. urban, short rural, long rural etc). These timeframes are specified in the (Queensland) Electricity Distributor Network Code (ENDC). EEQ requests that this document does not specify timeframes for Queensland given the differences in values between south-east and regional Queensland, and different feeder types. EEQ suggests that the Service Order Process document refers to the Queensland ENDC which may be subject to change from time-to-time.
Timing Requirement for Completion of the Requested Work	3.3.3 - Timing Requirement for Completion of the Requested Work – Table 10 - *Timing period for completion of work*	Table 10 – timeframes in regional Queensland are associated with the type of feeder (e.g. urban, short rural, long rural etc). These timeframes are specified in the (Queensland) Electricity Distributor Network Code (ENDC). EEQ requests that this document does not specify timeframes for Queensland given the range of differences between south-east and regional Queensland, and different feeder types. EEQ suggests that the Service Order Process document refers to the Queensland ENDC which may be subject to change from time-to-time.
Applicable Events and their EventCodes	4.4.1 - Applicable Events and their EventCodes – Figure 15	EEQ is concerned that the current Business Event descriptors may not be sufficient to address new market participant role (MC).

2. CSDN

Old Clause No	New Clause No	Comments
Definition of Timing Points and Timing Periods	3.1 Definition of Timing Points and Timing Periods – Table 2	Comment relates to Table 2 - Timing Period - *BusinessAcceptance/Rejection* for Notifications (Column 1) The draft process currently describes the Usage (Column 3) as: *If the BusinessAcceptance/Rejection has not been received before this period expires, the Initiator may escalate the non-receipt.* The B2B procedures have not defined / described the 'escalation' process. EEQ requests that this be made clear.
Other Timing Requirements	3.2 (d) (ii) Other Timing Requirements	The draft currently states: *The completion notification for the CATS Create, o;* This statement appears incomplete. Please update the requirement.
Common Business Rules for Notifications	4.1 (g) Common Business Rules for Notifications	EEQ is concerned that there is an obligation on retailers to investigate rejections within 5 business days. This creates an issue where the retail receives a large volume of rejections that it

		considers to be invalid or an unjustified rejection. EEQ would prefer that the term 'investigate' be replaced with the term 'validate'. *EEQ editorial comment*: editing of the paragraph (g) appears to be incomplete – possible that sub-points (i) and (ii) should be deleted.
Life Support	4.3.2 (a) – Life Support	EEQ provides the following comments on this section of the process: • The information field of "LifeSupportEquipment" is likely to be subject to change and the customer isn't obligated to update either the retailer and/or the distributor of this information. The intent of this information is unclear – for example – will it be used to prioritise restoration of supply for specific types of life support equipment. EEQ does not believe that this information is relevant and requests that the requirement to provide this information is removed • The information field of "PatientName" is not considered necessary for any notifications. EEQ requests that the requirement for a retailer to provide this information is removed; • EEQ requests that AEMO define when a 'customer churn' occurs in relation to life support customers so that the delineation between the current and future FRMP can be made clear

		• Is it proposed that there is no registration of a customer for life support until the supporting evidence (medical certificate) has been received? • The draft process as described involves manual processes such as phone calls and emails - EEQ proposes that these manual processes should be replaced with a high priority market transaction from the distributor / meter provider. This will reduce the potential for human error in handling these important notifications; and • EEQ is also concerned in relation to any retrospectivity that may be required to obtain the additional information (should these fields remain) for existing life support customers / equipment. At a minimum, 'no retrospectivity' should be specified for existing life support customers. • EEQ is seeking to clarify the obligations on a retailer where a life support customer transfers to another retailer. Specifically, at which point does the obligation to act as the 'database of record' end for the current retailer and become the responsibility of the new retailer. *EEQ general comment* - the AER is also proposing a Rule Change in relation to life support customers. At this stage the full details are unknown, however, it will be important to ensure that these market processes are consistent with the AER's position / market processes.

		If the AER is proposing changes to occur prior to 1 December 2017 AEMO / AER must be mindful of the ability for market participants to incorporate additional Rule / process changes during this period during times when additional system changes cannot be made (for example, during the system integration testing period). *EEQ editorial comment*: removes the 's' from 'becomes' in the second line of sub-section (a). Remove one of the 'full stops' at the end of the same sentence.
Site Access Request	4.5 (d) - Site Access Request	The draft process currently states that: *A participant can only use this transaction to obtain mass updates of information once the timing has been agreed with the relevant Participant.* EEQ requests that AEMO clarify / define the term 'mass'. The meaning is currently unclear.
Pre-Installation Data Request	4.7(a) - Pre-Installation Data Request	*EEQ editorial comment*: change the 'must' to 'may'.
PreInstallationDataResponse Data	5.6 PreInstallationDataResponse Data	In the Customer and Site Details Notification – Pre Installation Data Request, EEQ proposes that both the prospective and/or current FRMP should have the option to use the PID in addition to the MPs accessing these data. This information is references in the B2B Guide – Part 4, Table 1 – *B2B Transactions and Participants*.

3. Meter Data

EEQ has no comments on the draft Meter Data Process.

4. OWN

General Comment - EEQ would like to propose a new optional transaction type to cover force majeure / large scale disasters or similar declarations so that if the DNSP / MC / MP is attending sites, a notification can be sent to the MC and other interested parties. This transaction type should be specific to a disaster coordination and only be used in this widespread circumstance.

Old Clause No	New Clause No	Comments
Process Diagrams and Timing Requirements	3 - Process Diagrams and Timing Requirements	The OWN Process document provides no timings for *Low Priority Business Accept / Reject Timings*. EEQ requests that there is clarity provided on the timings and suggests that 5 business days is an appropriate time. In particular EEQ would like to have specified the response time for the NTN (Network Tariff Notification) – EEQ's position is that an appropriate timing is 5 business days.
Transaction Data	4 - Transaction Data - Figure 3 - *One Way Notification field values*	EEQ is seeking clarification / definition on the use of the acronym 'OWNP'. Suggest adding it to the Key below Figure 3.
Meter Fault and Issue Notification Data	Meter Fault and Issue Notification Data 4.1.5 - Figure 7 - *Meter Fault and Issue Notification field values*	Where the DNSP attends T1-4 meter and it's faulty, can the DNSP (T1-4) notify retailer via this OWN process? EEQ would recommend further consideration.
Notice of Metering Works	Notice of Metering Works	EEQ requests that the rows labelled 'Column19 - Latitude' and

Data	Data - *Figure 8 Metering Works Notification field values*	'Column20 - Longitude' are optional. This GPS level information may not be available in the field.

5. RoLR Part B

EEQ has no comments on this process.

6. Glossary and Framework

Clause	Heading	Comments
Basic Exchange Model	5.1 - Basic Exchange Model	*EEQ editorial comment*: Correct spelling mistake in 5th dot point - 'Initiator'
		EEQ comment – The term 'technical disconnection' is not defined in any of the B2B Processes or the B2B Guide. Please define in the Glossary and Framework document. This is broadly described in Figure 10 of the B2B Guide but should also be specified elsewhere.

Attachment 2

B2B Guide

CONSULTATION

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant**: Ergon Energy Queensland (EEQ) – Retailer*

***Completion Date**: 1 December 2016*

Table of Contents

1. Guide 3

1. Guide

EEQ general comment – the draft B2B Guide needs to be further updated once the all of the Power of Choice process, design and technical elements have been finalised.

EEQ general comment – The term 'technical disconnection' is not defined in any of the B2B Processes or the B2B Guide. Please define in the Glossary and Framework document.

Clause	Heading	Comments
Document Control	1.2(c) - Document Control	*EEQ editorial comment* – replace 'TBC' with working group name in final version of B2B Guide.
Notified Parties	3.3 (f) – Notified Parties	EEQ editorial comment – Please update the reference (Error! Reference source not found) in the final version of B2B Guide.
Business Communications Model Changes	3.4 (b) - Business Communications Model Changes	Currently sub-section 'b' includes the following statement - *The message copy that is routed by the Hub to the Notified Parties will be changed by the Hub to signify it is a copy only (TBC).* EEQ is seeking to confirm when AEMO will design / draft the process to notify the Interested Parties.
Business Communications Model Changes	3.4 (f) - Business Communications Model Changes	Currently sub-section 'f' states - *In order to avoid complex exception situations where (for example), the Recipient accepts a Service Order, but the Notified Party rejects the Service Order Copy causing an*

		exception for the Initiator to deal with, it is proposed that the Hub will ensure that no message responses are sent from the Notified parties to the Initiator. The Hub alone will manage the message acknowledgement with the Notified Party (TBC). Consistent with the previous comment, EEQ is seeking to confirm when AEMO will design / draft the process to notify the Interested Parties.
Table of B2B Communications	4. Table of B2B Communications - Table 1 – *Table of B2B Transactions and Participants* – B2B category *Service Orders*	Line 1– *Supply Service Works - Allocate NMI* - the Notified Parties should include the MC for this process. Lines 2 – 4 – *Supply Service Works – establish permanent, establish temporary and establish temporary in permanent* – Please verify that these service orders can be raised concurrently with metering service works. It will be important that there are no dependencies to ensure efficiency. Transaction Type - Metering Service Works (all subtypes) comment - If an MC raises a *Metering Service Works* transaction then the retailer needs to be a Notified Party. Please add retailers to the Notified Parties for each of these subtypes. Similarly if a retailer raises this transaction then an MC needs to be Notified. Please add MC to the Notified Parties. Transaction Type - Metering Service Works – subtype *Install Controlled Load* – add DB to the Recipient/s list for Type 5 and 6 meters. Transaction Type - De-energisation - subtype *Supply Isolation* - This will be raised by the MP / MC more frequently than the retailer. Add

		MP and MC to the Initiator/s.
Table of B2B Communications	4. Table of B2B Communications - Table 1 – *Table of B2B Transactions and Participants* - B2B category - One way notification	Transaction Type – *Meter Fault and Issue Notification* – Add MC to the Notified Party. It is likely in the instance of a meter fault the transaction will be raised by an MP or DB.
Table of B2B Communications	4. Table of B2B Communications - Table 1 – *Table of B2B Transactions and Participants* - B2B category – Meter Data Process	Transaction type – *meter installation inquiry response* - 'RP' is included in the 'Initiator/s' column. Please change this to 'MC'. Transaction type – *provide meter data* – EEQ requests that the ('old') MDP should be added to the 'Initiator' column.
Table of B2B Communications	4. Table of B2B Communications - Table 1 – *Table of B2B Transactions and Participants* - B2B category – One way notification	Transaction type - *network tariff notification* – EEQ would like the ability (as a retailer) to 'object' to this notification.
Table of B2B Communication	Re-energisation subtypes missing from table	2.13.3 (g &h) in the Service Order Process suggest that there should be ServiceOrderSubtypes for re-energisation. There are no ServiceOrderSubtypes for re-energisation listed in this table. For example, New Reading Required, Retrospective Move-in, Sticker Removal
Service Orders	5.1.1 (c) (iii) – New Connections	EEQ requests that this clause be deleted. This is consistent with EEQ's previous comment (refer to previous comment) that apply to Lines 2-4 of the Table of B2B Communications where EEQ's

		perspective is that each of these service orders should be able to be done concurrently.
De-Energisation Summary	5.1.3.4 (a) - De-Energisation Summary	*EEQ editorial comment* - Remove the 'non-payment' from (1) and (2).
Customer Details Request	5.2.1 - Customer details request	Please clarify in this section what the obligations of a retailer are in the situation where a life-support customer churns to another retailer. Is the original retailer obliged to contact the new retailer and provide this information? When does the 'database of record' end for a retailer? In addition, as previously noted, EEQ does not support the proposed email / phone process of communicating changes between market participants for life support customers as this introduces risk. This process should be completed via market notifications.