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: *EnergyAustralia*

Completion Date: *2 December 2016*

Table of Contents

1. Service Orders 3
2. CSDN 11
3. Meter Data 17
4. OWN 18
5. RoLR Part B 19

1. Service Orders

New Clause No	Comments
1.3.1 exclusions	**Typo –** full stop used, should be a; for item (iii), i.e. (iii) Automated / electronic Service Order status requests. The Retailer should contact the Service Provider if they require a status report;
1.3.2. Terminology	**Grammatical change**: Suggest the 'ors' are replaced with commas in this sentence *The term "Service Provider" is used to refer to the DNSP ~~or~~, MDP ~~or~~, MPB or ENM as appropriate for a given type of Service Order.*
	Suggest this passage be rewritten. Suggested edit are tracked below. Also, should Metering provider be included in the section I've highlighted too? *The term "Service Paperwork", means the ~~appropriate jurisdictional~~ Safety Certificate, form, document, legal article as prescribed by the respective jurisdictional instrument or national instrument ~~used~~ in relation to a Supply Service Works Service Order, Metering Service Works Service Order, De-Energisation, Re-Energisation or Abolishment Service Order, or other forms or documents ~~as~~ required by a DNSP (What about Metering Provider?) and as discussed and agreed by participants to facilitate the fulfilment of the Service Order request.*

Table 1 Service Order Types and Subtypes	**Minor Typo** Typo in the "Description of use" for Re-energisations. The 's' is missing from the end of premises Examples: - Customer is moving into a premises
Section 2.1 (b) (Compared with Figure 11)	In relation to this statement *"If no ServiceOrderSubType is provided in a SO request, the Recipients normal practice will apply"* It is not consistent with - Figure 11 Transaction Data table where the service order subtype field is a mandatory field for Supply Service Works, De-energisation and Metering Service Works SO types and - Table 1 SO types and sub types - SO type = Metering service works, Blank SO sub type. Furthermore, the statement isn't really clear. We are not quite sure what 'normal practice' covers. A couple of examples of normal practice may help in this section.
Service Order SubType	**Service Order Sub Type** What Service Order type sub type is to be raised if the point of attachment is changing? If it is supply alteration, please add to the description/example of Service Order type/sub type table.
Temporary Isolation Subtype	**Clarification on re raise trigger needed** This states that if supply isolation extends beyond 24 hrs a re-energisation Service Order to the DNSP is required. Please clarify how will the Retailer know that it has extended beyond 24 hrs? Will the Service Order response indicate something to trigger the Retailer to raise a re-energisation Service Order?
Metering Reconfiguration row	**Formatting: Extra Bullet Point** There's a random bullet point in the description of use cell.

Meter Investigation row	**Rewrite/tidy up suggestion: The description of use could do with a little bit of a tidy up** Examples: A need to investigate ~~a~~ can arise where: • A Customer believes there is a problem with the *metering installation*. a Customer raises a request with their Retailer to investigate a meter fault; ~~or~~ the Retailer has grounds to proceed with an investigation e.g. -suspected fraud/tampering. -consistent abnormal meter readings. ~~Typically a Customer believes there is a problem with the *metering installation*.~~ ~~A Retailer may request an investigation~~ ~~on the grounds of:~~ ~~suspected fraud/tampering.~~ ~~Consistent abnormal meter readings.~~
Metering Service Works	Our business suggested that it may be beneficial for a subtype under Meter Service Works to accommodate changes to communications. It would be used for situations where a new customer moves into premises and we wish to get communications set up for that meter (i.e. change 4A to 4). In the procedures, it appears the Service Orders we could use would be a Meter Reconfiguration or a Miscellaneous. Given this will be a new scenario the industry will process and based on exemption rules surrounding customer refusal and no communications, a separate and clearly defined transaction will be beneficial for industry. There is potential that without having a clearly defined transaction, participants may request these using various methods. Having a uniform and standard method will reduce any complexity and confusion for participants to handle these scenarios.
Install Hot Water and Change Timeswitch sub types	**Unnecessary Service Order subtypes** The Install Hot Water and Change Timeswitch subtypes have been left in the table. Our understanding is that these requests will be accommodated by the Install Control Load subtype. If this is so, please update the procedure (note: the B2B guide suggests that these service order sub types are being rolled up into the Install Control Load).

2.1.2. General Principles	**Suggest add timings in these sentences** e) The Recipient must return a *BusinessReceipt in 1 business days* to the Retailer to confirm that they have received the ServiceOrderRequest (f) The Recipient must send a *BusinessAcceptance/Rejection* to the Retailer *in 1 business day*.
	Minor Typo : Extra full stop (i) Where a ServiceOrderRequest requires a site visit and the Meter is a type 6 meter, then the requested work will always require the taking of a meter reading.~~.~~
	Section reference link will need to be updated in this section (g) If a Recipient wishes to reject a ServiceOrderRequest, the Service Provider must indicate the reason for rejecting a Request by the use of an appropriate *EventCode* in a *BusinessAcceptance/Rejection* transaction. Refer section 0 for the list of relevant *EventCodes*.
2.2. Acknowledging Receipt of the ServiceOrderRequest	**Section reference link will need to be updated in this section** (d) Reasons for a rejection or validation errors must be advised to the Initiator using the *EventCodes* detailed in section 0) *BusinessAcceptance/Rejection*.
2.13.1. Explanation of use of ExceptionCodes	**Consistency / Grammar**: Use of full stops not consistent in this section, some examples below <u>Value column</u> Documentation Not Provided <u>Definition column</u> *Service provider unable to contact a remotely controlled device* *Service provider unable to determine* *connection status of a remotely controlled device* *Used in conjunction with a response to a Service Order Abolishment by a DNSP*
Sensitive Load row	Given that the CDN format is changing to accommodate the separation of Life Support and Sensitive Load, the exemption codes need to be updated to reflect this.

2.13.4. De-energisation	**Rephrase suggestion to assist with clarity** In relation to this section *(b) When the DNSP has access to perform the De-energisation but reasonably believes that there is a valid reason the De-energisation should not take place, the DNSP may contact the Retailer by phone and (within reason) act upon the instructions provided by the Retailer.* The language should be tightened up to indicate that the DNSP must contact the retailer; otherwise this section is just guidance/ suggestion and doesn't provide a clear direction on how to treat this scenario.
2.13.4. De-energisation	**Incorrect SubTypes referenced** In the description there is reference to the De-energisation sub types being *"Remove Fuse (Non-payment)"* or "*Pillar box, Pit or Pole top (Non-payment)"* These sub types are not listed in the service order table on page 7 (section 2.1 Process Overview section). Please update the procedure to reflect the correct sub types.
	Paperwork Requirement Please confirm if this is needed (was of the understanding that de-energisations do not require paperwork, reconnection may, not de-enerigations) *(v) This Service Order type has Service Paperwork requirements in some jurisdictions. See clause 2.13 for details regarding Service Paperwork processes.*

2.13.6. Supply Abolishment	**Specify the Role responsible** If Supply Abolishments are only ever handled by DNSPs, the highlighted 'Service Provider' should be updated to reflect 'DNSP' as this is the only role that will perform this task. *In SA, Victoria, Tasmania and Queensland, the Retailer must ensure that all necessary paperwork is supplied to the Service Provider in order to progress and complete the Supply Abolishment. The ServiceOrderRequest does not replace the need for the paperwork associated with a Supply Abolishment. This Service Order type has Service Paperwork requirements in some jurisdictions. See clause 2.13 for details regarding Service Paperwork processes*.
3.3. Specific Timing Requirements (Figure 10 Timing Period for completion of work)	**Drafting Error: Applicability of Metering Service Works Order in NSW** It is stated that the Metering Service Works service request is not available in NSW. I believe this is a drafting error because how else will retailers/MC request metering installations with their MP in NSW if this is not available? **Suggestion:** Our business has indicated that if there are going to be service order types that are only applicable in some jurisdictions, the Service Order per Jurisdiction Matrix that is in the current B2B procedures should remain in the updated procedures (obviously with the updated Service Order Types).
4.1. ServiceOrderRequest Transaction Data	**Typo** Definition section for Embedded Network Parent Name Valid MSATS ~~p~~Parent identifier. Not Required for a "Cancel" ServiceOrderRequest.

	Each of the Service Order subtypes carry with them different mandatory pieces of information. With this in mind it is imperative that the “M/N/R/O” is clearly defined for each service order sub type. Suggest that either a table needs to clearly provide the M/N/O/R against Service order sub type level or at, the very least, description details should be provided stating when it is M/N/O/R in the situation that multiple options are provided. This level of information is required for system validation to be built and for all participants to be clear as to what is mandatory. Furthermore, some of the M/N/R/O values appear to be incorrect. Here are some examples of where it is confusing and where the values should be amended to reflect the correct data collection requirement: - Notified PartyID has M/N but nothing in the definition defines when it is M and when it is N. We assume in this case that the N is for "not required for cancel SO req". But there are several instances when there will be no notified party, e.g. sending a SO for a type 5/6 meter or Allocate NMI, so this should not be a mandatory field. - NMI: Supply Service Works should be M/O or N - since the definition is clear that is not mandatory for Allocate NMI. - ServiceOrderAddress: Supply ServiceWorks should be M/N since the definition is clear that is mandatory for Allocate NMI and not required for the rest. - MeteringSafetyCertificateID: Supply Service Works = R/N. The definition needs to define when it is R and when it is N. - REC = Name and all related fields> Supply Service Works = M/N. Are we saying this is mandatory for all sub types? However, it would not be required for a tariff change, for example. The N is not clearly defined right now it only states not required for cancel.

	- ServiceOrderCoordinationRequired, CoordinatingContactName, CoordinatingContactTelephoneNumber: all SO types = M/N. The definition needs to clearly define when these items are not required. Currently only states not required for cancel, it needs to add not required when no coordination is required. - InitiatorContact and InitiatorContactTelephoneNumber = O/N. Definition needs to define when O and when N. - MPB, MDP, MPC, RP = M/N for Supply Service Works. Definition needs to define M and N. Currently N only refers to cancel SO but it should state that it's not required for other sub types - CustomerType, Supply Service Works = M/N. Definition needs to define when it is M and when it is N. That is, is the N only for cancel requests? - AverageDailyLoad - Supply Service Works = M/N, Metering Service Works = M. Please clarify is the N for cancel SO requests only and the average daily load is mandatory for all supply service works? If this is the case should Metering Service Works = M/N? Or if there are some sub types within supply service works where average daily load is mandatory and others where it is not. If this is the case it should define these.
New Transactions as part of SWG	**Potential Issue: Notified Party comms model not finalised** There is growing concern that there are technical constraints for how notified parties will be accommodated in B2B Communication Protocols. For example, the Notified Party is notified of the Service Order Request and Response and the related Message and Transaction Acknowledgement model, within the B2B Protocols. EnergyAustralia would like to understand what technical limitations the notified party requirements will have and how this will alter the procedures. Given participants need to start scoping and building processes and systems now to be ready for industry testing and Go Live, significant scope changes will add excessive cost, risk, complexity to implementation and or may make it untenable.

2. CSDN

New Clause No	Comments
Figure 2 CustomerDetailsNotification process (Notification sent by an Initiator)	Suggest that this diagram is explicit that “initiator” is Retailer. Using generic language in this section can confuse the process (retailers are not expected to get CDN’s from DNSPs for LS notification).
Figure 3: Overview of generic request process for CustomerDetailsNotification or SiteDetailsNotification	General Feedback: Please correct the quality of this diagram it is blurry and cannot be read properly.
Figure 3: Overview of generic request process for CustomerDetailsNotification or SiteDetailsNotification	In the diagram this section needs to be updated as Sensitive Load is no longer the term used to flag Life Support requirements. CustomerDetailsNotification with *MovementType* = Reconciliation, only for NMIs where *SensitiveLoad* = Life Support
4.3.2. Life Support	**Typo** (a) In addition to informing a Recipient through the *B2B e-hub*, The Retailer must immediately advise the DNSP by telephone when they become~~s~~ aware of a Life Support situation

	In respect to this section, there is no obligation for the DNSP to pass on contact details to the retailer. Without this information we are unable to contact the customer. The contact number should be required. *(b) The DNSP must immediately advise the Retailer by telephone when they become aware of a Life Support situation). The DNSP must subsequently send an email to the Retailer as soon as practicable after the telephone call confirming the Life Support situation. The email from the DNSP to the Retailer must at a minimum include the following information about the Life Support situation:* *(i) NMI* *(ii) Site address* *(iii) Life Support Equipment* *(iv) Customer details (if available)* *(A) Account Holder Name* *(B) Patient Name* Also, the numbering of this section is not consistent (first four items are i to iv, the last 2 are A and B).
4.3.2 (c) (iv) – Removal of life support	**Suggestion for additional guidance note** There is a risk that certain sensitive load sites are missed under the criteria stated in this obligation. It could be stated that when a site is no longer classified as a life support site, but is a sensitive load site that the sensitive load field is to be “sensitive load” and not “none”. This is particularly important because currently the value “life support” takes precedence over “sensitive load” (in the current sensitive load field) if a site fits the criteria for both.

4.5. Site Access Request	In relation to the below passage, it indicates that while any current party can request this transaction, point b suggests that only DNSP/MDPs can send a maximum of one per NMI per day. (a) Any current party entitled to the information can generate a SiteAccessRequest to another related party for the NMI (b) A DNSP or MPB must only send only a maximum of one SiteAccessRequest per *NMI* per day. Please clarify if the intent of the procedures is so that permissible parties can ask for as many as they want but there are restrictions on how many per day an on MDP/DNSP can request. If this is correct, please also clarify why there is a restriction on only the MDP/DNSP for sending this transaction. Furthermore, in considering site access requests, establishing who is the master of the data will assist with ensuring records are (more than likely) correct and current. As the market increasingly moves to remote communications for meters, site access information will become less front-of-mind for participants. With this in mind, the risk of not establishing the 'owner' could result in multiple versions of this data being sent between market participants which could override more recent and accurate data. In respect to who would be the logical owner of the data, it would be sensible that it is the MP/MDP roles currently owned by the distributors (and their meter readers) as they are the people who most frequently visit the site. As meters get swapped to Type 4, the incoming MP can request site access information from the owner then be responsible for maintenance of this information so that if needed, other participants can request via this transaction.

5.2. CustomerDetailsNotification	Please confirm if the supplementary life support fields (i.e. equipment, patient name etc.) are only required once equipment is selected. Our assumption is that Life Support needs to be flagged as 'yes' before the other fields are mandatory. If subsequent Life Support only fields are updated (for example, equipment was updated but the LifeSupport field was flagged as 'no') it will be up to our system validation to check if there was an error in data entry. Please note: In our submission we have also questioned the need of the equipment field, so depending on how the procedures develop, the content of this consultation question changes.
Additional Information – Mass Market and C&I	**Suggestion: Large and Mass Market CDN Values** Our business has indicated that a separate column indicating whether the field is relevant to Mass Market or Large would be useful to include. The CDN requirements for customer classes differ and if there is a way to identify and define this it will make compliance and building these transactions easier for industry.
AccountcontactEmailAddress	In relation to this field, we suggest it is 'R" (not M/N). We can supply it if we have it, it should not be mandatory (not everyone has an email address) and even if they do, they may not want to supply it.
EmailAddress	As above
Life Support Evidence	Rather than having this as a Yes/No field, there is merit in having 3 options (i.e. an enumeration) to reflect the status of how the industry handles Life Support. For example: • Not Required • Pending • Confirmed This change will potentially support a way to improve how our industry manages life support scenarios.

4.1 (g) i & ii	These two sub points don't align with their corresponding statement. Believe they were left in accidentally from pre-draft.
5.2 – Life Support Equipment and Patient Name	**Clarity on handling multiple life support patients and multiple equipment types** The CDN process supporting life support accounts for single patients and single equipment types. There are instances where there are multiple people at premises with life support and or multiple Life Support equipment type/s. With this in mind, how should these situations be handled via the CDN?
Life Support Equipment	**Need of the Life Support Equipment Field** On the topic of Life Support Equipment, the NERR and ERC state that Life Support equipment is (*a) an oxygen concentrator;* *(b) an intermittent peritoneal dialysis machine;* *(c) a kidney dialysis machine;* *(d) a chronic positive airways pressure respirator;* *(e) crigler najjar syndrome phototherapy equipment;* *(f) a ventilator for life support;* *(g) in relation to a particular customer—any other equipment that a registered medical practitioner certifies is required for a person residing at the customer's premises for life support;* Given the last point, this means the equipment type could be a wide range of apparatus and therefore the value housing the equipment is questionable. I would think that if a doctor has certified Life Support equipment (whatever it is) is needed, industry participants knowing what it is doesn't help (there are no separate obligations or requirements for different equipment types, so the point being, what is the value in capturing this?). There is however different rebates under concession schemes for equipment types. This has no relevance to the CDN notification process. If industry adopts more rigour around a process to confirm life support and remove life support flags once not needed, this will ensure we are registering and maintaining our life support records more effectively and the equipment type becomes immaterial.

5.2 – Sensitive load field	**Sensitive Load Field Size Limit** There is a 20 character size limit on this field and factoring in that Sensitive Load is already 14 characters, this only allows for 6 characters to describe the type of sensitive load. We suggest that: • The field size is expanded to allow enough characters to properly describe the type of sensitive load. • A list of industry agreed abbreviations is agreed.

3. Meter Data

Old Clause No	New Clause No	Comments
	2.5.6. Remote On Demand Meter Read Request	Our business wishes to seek further clarity on the need to build a specific transaction for Remote on Demand Requests. Considering that an initiator sends a RemoteOnDemandMeterReadRequest, and the recipient sends a MeterDataNotification, which is also how requests for Provide Meter Data and Verify Meter Data are handled, do we really need a separate transaction? It would appear that we are building a separate transaction for a function that can already be accommodated by existing transactions.

4. OWN

Old Clause No	New Clause No	Comments
	Figure 6 Planned Interruption Notification field values	**Typo** There are a couple of typos in the Description in row 11 (column 11) i.e. *The reason for Planned Interruption. A few examples are provided below:* *Meter Exchange - Individual* *Meter Exchange - Rollout* *Meter ~~Replacment~~Replacement - FamilyMaintenance* *Meter Test* *Free Text*

5. RoLR Part B

Old Clause No	New Clause No	Comments
	General Use of MC and RP	**MC vs RP use throughout document** It has been noted that MC appears to be used to reflect the RP role in some sections. Please update references to RP/MC as per the function being described in the procedure (I.e. RP to refer to the role in MSATS, MC to refer to an abbreviation for Metering Coordinator used by participants to reflect the body performing the RP role in MSATS).

	RoLR for MC	**Matter for future consideration: potential issue MC Failure** The involvement of the MC in the industry's ROLR processes adds another level of complexity to this already complicated and important process. Whilst it is clear that RoLR relates to failed Retailers, the procedure of how the industry will manage a failed MC should be consulted on and documented. A Retailer would be responsible to appoint a new MC (and it is expected that Retailers have considered this as part of their agreements with appointed MCs) however, given the administration requirements needed (revised contracts, communications to customers, data collection and reporting, management of inflight transactions, reconciliations etc.), an industry standard on managing this process will assist participants with guidance through an event like this.