B2B Procedures Service Orders

CONSULTATION – SECOND Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

1. Service Orders

ISSUE for Consultation – currently in the Draft procedure, a Co-ordinating Party is identified by the Initiator of a Service Order where co-ordination of multiple parties is expected to be required. The Initiator sends the co-ordinators details to other parties via a Service Order Request, which will need to do part of the work required to complete a service for the customer. The Co-ordinator Party can be an LNSP, MP, the customer or their agent, for example an REC or Body Corporate Manager.

A. Option 1 – retain the drafting as above

B. Option 2 – TasNetworks have suggested a change to the process whereby the Initiator must send the details of all co-ordinated parties to the Lead co-ordinator to start the process. This enables the Lead co-ordinator to start the co-ordination process. But will preclude non-market participants from taking the Lead coordinator role – because nonmarket participants will not receive any service order containing the details of who to contact. This change will add additional repeating SO order transaction fields, "Lead Contact Name" and "Lead Contact Telephone Number".

Tally of participant submission responses on the above issue for consultation:

A. Option 1 = 10
B. Option 2 = 3
C. Neither = 2

Issue for consultation and general comments

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
1	CitiPower Powercor	Issue 1	**Co-ordinating Party** CitiPower Powercor recommends Option 1 is retained. Option 2 appears unreasonable and will lead to delays resulting in a bad customer experience. It will also preclude non-market participants from being a Lead co-ordinator party in scenarios where it makes sense to perform this role as well as forcing a Retailer to collect contact details for multiple parties to enter into the service order makes it a clumsy and impractical option.	The B2B Procedures will retain Option 1 "a Co-ordinating Party is identified by the Initiator of a Service Order where co-ordination of multiple parties is expected to be required." The IEC decision is based upon the number of responses received during the Draft Determination consultation in favour of option 1.

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
2	Pacific Hydro	[Issue 1]	ISSUE For Consultation Pacific Hydro prefers the drafting for the Co-ordinating Party to remain unchanged. It is a requirement the Initiator makes arrangements with the co-ordinating party to undertake the task. It is at this point all parties involved in the service order process would be identified.	Refer to the response provided for Item 1.
3	UED	Issue 1.	**Coordinating/ Coordinated Party Issue** - UE does not support the alternative option 2 proposed by Tas Networks. UE believes that the fact that it precludes non-market participants from being a co-ordinating party and the fact that Retailers will need to enter multiple contact details of the parties to be coordinated into the service order to the coordinator makes it clumsy and impractical. UE is of the view that only Option 1 should be supported until such time as the industry has gained some operational experience and is in a better position to modify the solution to address real world deficiencies.	Refer to the response provided for Item 1.
4	VECTOR AMS	Issue 1.	In response to consultation issue 1. 'Co-ordinating Party drafting' raised by AEMO, VectorAMS support Option 1 – retain current drafting.	Refer to the response provided for Item 1.

5	Aurora Energy	[Issue 1]	~~ISSUE for Consultation – currently in the Draft procedure, a Co-ordinating Party is identified by the Initiator of a Service Order where co-ordination of multiple parties is expected to be required. The Initiator sends the co-ordinators details to other parties via a Service Order Request, which will need to do part of the work required to complete a service for the customer. The Co-ordinator Party can be an LNSP, MP, the customer or their agent, for example an REC or Body Corporate Manager.~~ ~~A. Option 1 – retain the drafting as above B. Option 2 – TasNetworks have suggested a change to the process whereby the Initiator must send the details of all co-ordinated parties to the Lead co-ordinator to start the process. This enables the Lead co-ordinator to start the co-ordination process. But will preclude non-market participants from taking the Lead coordinator role – because non-market participants will not receive any service order containing the details of who to contact. This change will add additional repeating SO order transaction fields, "Lead Contact Name" and "Lead Contact Telephone Number".~~ ~~Aurora Energy comment:Aurora Energy preference is option 1~~ **From:** Paul Willacy [mailto:Paul.Willacy@auroraenergy.com.au] **Sent:** Tuesday, 24 January 2017 12:40 **To:** Power of Choice <PoC@aemo.com.au> **Cc:** David Sales <David.Sales@tasnetworks.com.au>; Adrian Honey <adrian.honey@tasnetworks.com.au> **Subject:** RE: Aurora Energy responce to B2B procedure Changes stage 2 Good Afternoon Aurora Energy have had a meeting with Tasnetworks today. During the meeting Aurora Energy got better clarity on TasNetworks proposal on the Coordinating Party consultation. After discussing the proposal and gaining a better understanding of the context Aurora Energy would like to endorse TasNetworks proposal and support Option 2 of the consolation. I realise that this is a late request, however this has been the first opportunity to gain clarity on the proposal, so I am hoping AEMO will take this into consideration. Regards **Paul Willacy**	Refer to the response provided for Item 1.

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
			SME Metering Competition	
6	Energex & Ergon Energy	7.3 1A [Issue 1]	ISSUE for Consultation 1 Option 1 (A) is our preferred option as it reduces the need to add additional fields.	Refer to the response provided for Item 1.
7	Origin Energy	Issue 1	Origin support the existing Option 1 as per the drafting	Refer to the response provided for Item 1.
8	Active Stream	[Issue 1]	Option B The most efficient process would be to identify all the parties required to be co-ordinated and provide their details. Providing only the co-ordinating Party details delivers inefficiencies to the process. Is the co-ordinating party supposed to wait for other parties to contact them? What timeframes do the individual party/ies have to contact the co-ordinator? Coordinators are supposed to manage the activity and to do that efficiently including scheduling they should be able to contact all appropriate parties. There are numerous changes been made to the B2B SO and it would be preferable to make those changes now than to revisit them at another point in time, as the costs and effort would be far greater.	Refer to the response provided for Item 1.
9	Endeavour Energy	Consultation Question re Co-Ordinating Party	The suggested redrafting introduces restrictions on who can be a Co-Ordinating Party and doesn't remove the need for off market communication between parties. Option A – retain the current drafting is supported by Endeavour Energy	Refer to the response provided for Item 1.
10	SA Power Networks	Issue 1	**Co-ordinating Party** SA Power recommends Option 1 is retained.	Refer to the response provided for Item 1.

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
11	AusNet Services	1. Options for Lead Co-ordinator	AusNet Services considers the introduction of co-ordinator parties already has no regulatory Head of Power. Co-ordinating supply restoration and bulk metering changes will be driven by commercial agreements or DSNP preferred operating arrangement. As such the introduction of new co-ordinator related fields CSDN fields is already unnecessary. An initiator delegating the all the co-ordination activities to a single Lead Co-ordinator would actually break the commercial and regulatory framework of Power of Choice where the retailer is responsible for co-ordinating all necessary contestable metering arrangements. Such arrangements would be complex, and result in the customer not knowing who is doing what. Therefore, we are strongly opposed to Option 2 and prefer Option 1.	Refer to the response provided for Item 1.
12	Energy Australia	Lead Coordinator Role – Options	Our preference is that option 1 is retained. Through mechanisms like contracts and process agreements with the likes of MP, MC and LNSPs we will be able to identify the most appropriate role to fulfil coordination duties that does not warrant the need for additional transaction fields.	Refer to the response provided for Item 1.
13	AGL	Issue for Consultation [Issue 1]	AGL supports TasNetworks suggestion to add repeating fields to the service order request for the coordinated parties. AGL suggests that the applicable fields should be • CoordinatedRole (enumerated list including values like “MDP”, “LNSP”, “Customer”, “Electrician”) • CoordinatedContactName • CooridnatedContactTelephoneNumber The added information should be optional	Refer to the response provided for Item 1.

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
14	Jemena	4.1 [Issue 1]	Jemena does not support the approach outlined in the POC Procedure Changes (B2B) - NER Draft Determination Consultation Paper, for the identification of a"coordinating party". Jemena is of the view that the concept of a Coordinating Party has not been developed to a mature state. Jemena understands that the role (not an official market role) was considered as a means to coordinate the many parties that may be involved in managing the impact of a HVI with a large number of meters being made inoperable or faulty. As the coordinating party has no official role in the market, it is unclear on what grounds they would be given access to the customer and metering information required to perform any effective coordination. The issue of how to manage a large scale HVI is one that would be better managed by an agreed procedure agreed between each network and the MCs operating in that network.	Refer to the response provided for Item 1.

15	Pacific Hydro		**Service Order Process – Notified Party** ***2.3. Notified Party*** (c) The Initiator must identify and include details of Notified Parties using the NotifiedPartyID in the ServiceOrderRequest, unless the Initiator has elected to manage notifications to Notified Parties separately. And (e) The Initiator must notify Notified Party/s on: (i) Receipt of a positive *BusinessReceipt* for a ServiceOrderRequest from a Recipient; (ii) Receipt of a negative *BusinessAcceptance/Rejection* for a ServiceOrderRequest from a Recipient; (iii) Receipt of a ServiceOrderResponse from a Recipient; Pacific Hydro contends the only obligation for a participant to notify another party in relation to work at the site is prescribed in Part 5, Division 5, Section 104, of the NERR whereby the retailer is to notify the distributor after a remote de-energisation has completed and provide the reason for the de-energisation. ***104 Notification of de-energisation*** (2) If the retailer has arranged to de-energise a customer's premises remotely in accordance with the energy laws, the retailer must as soon as practicable after the de-energisation notify the distributor of the remote de energisation and the reason for the de-energisation, except where the de-energisation is as a result of the distributor's request. One of the two components of this obligation (The NERR obligation) is already being met by the MSATS Procedures as follows: **Section 17** This section details the requirements for an MSATS transaction (Change Reason Codes: 3050/1 – Change Metering Installation Details to be generated by the Participant responsible for completing the Service Order request. MSATS notifications for these change requests will be sent to participants who have a relationship with the NMI (notified parties).	The IEC resolved to make the obligation to notify parties for service orders a non-binding obligation. The IEC noted the e-hub will have this functionality and a number of distributors and retailers are building this functionality into their systems and processes. The IEC agreed to revisit the requirement, after 1 December 2017, if there is evidence to show that the non-binding arrangements are resulting in inefficient outcomes for the market and end-consumers. The B2B Procedures have been amended to remove the obligation participants must notify parties and reflect that participants can choose to use the B2B Procedures and the e-hub, for the purpose of notifying parties if they wish.

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
			Pacific Hydro contends the second component (reason for Remote De-Energisation) should also be included in the MSATS Procedure, perhaps as part of the Meter Register Status Code 'D'. This ensures : • Efficiency - Process, Procedure & Systems; • Clarity - Single point of update; • Timing. Pacific Hydro contends the obligation to notify parties in the procedures falls outside of the jurisdiction of the IEC and the B2B Procedures. Pacific Hydro notes significant investment was made by industry and a directive, issued by the IEC, to ensure the B2B Procedures include only material within its jurisdiction. Where additional material was included this would be as 'guidance notes'. Pacific Hydro suggests the IEC to either: • Remove all references to notified parties from the Procedures; or • Amend the Procedure to remove the obligation for a participant to notify parties but provide an option allowing participants choosing to use the B2B Procedures and the SMP, for the purpose of notifying parties. For example: ***2.3. Notified Party*** (c) The Initiator ~~must~~ may identify and include details of Notified Parties using the NotifiedPartyID in the ServiceOrderRequest. and (e) The Initiator ~~must~~ may notify Notified Party/s on: (i) Receipt of a positive *BusinessReceipt* for a ServiceOrderRequest from a Recipient; (ii) Receipt of a negative *BusinessAcceptance/Rejection* for a ServiceOrderRequest from a Recipient; (iii) Receipt of a ServiceOrderResponse from a Recipient;	Changes to MSATS is not in scope for this consultation. The IEC advises that all proposed changes to MSATS be taken up with AEMO.

16	Pacific Hydro		New Connections Prior to the introduction of Power of Choice, the B2B process to affect a New Connection required the raising of a single Service Order. This was an efficient process and met regulatory timeframes for the completion of such services. Pacific Hydro recognises Power of Choice will introduce complexities in New Connections as there are now (potentially) more parties involved in the process. The new procedures require a Retailer to raise and manage at least 3 Service Orders, in various sequences and processes that are different across Jurisdictions and potentially DNSPs, to affect the same outcome as the current single Service Order. These procedure changes increase complexity, the likelihood of exceptions and cost to serve and potentially impacts the outcome for the end use consumer. Pacific Hydro notes that, whilst the changes proposed appear to support competition in metering and related services and appear to meet current and future requirements of the market, Pacific Hydro does not believe these changes have taken into consideration the explicit requirement of the IEC to ensure backwards compatibility. There is no option for a Retailer to send a single transaction, for example to a Metering Co-ordinator, to affect a New Connection. There is also no option for a Retailer to send a single transaction to the B2B e-Hub and rely on the B2B e-Hub to interact with the relevant parties. As late as November 2016 we understand the IEC were expecting a solution that provided the capabilities for 'one-to-many' transaction processing. The IEC Minutes from the November 9 meeting (6.5. B2B procedures – timetable and approach) noted that expectations were for one-to-many transactions to be developed and delivered as part of the work undertaken by the Systems Working Group (SWG). Pacific Hydro notes that the IEC endorsed a timetable and approach to complete the draft B2B Procedures to be released for consultation on 23 December 2016. In discussing this item, the Committee: • Raised questions around the proposed system's ability to support the draft B2B Procedures specifically "one to many" transactions and message acks/nacks;	The IEC acknowledges the concerns regarding the changes to the service order transactions (i.e. where existing transaction have been split out to reflect service orders to be sent to either distributors for regulated services or metering coordinators or others). The IEC notes the expectations that the B2B framework would continue to support FTP and some existing transactions structures particularly for the majority of market transactions like re-energisation, de-energisation and special reads which will continue effectively unchanged under POC. The IEC has agreed to not incorporate the backward compatibility of the current transaction structure this into the final B2B procedures released in March 2017. The IEC requested AEMO consider whether a translation table can be made available to participants to enable them to continue to send some old transaction types in a manner compatible with the new transaction types (and the new schema). AEMO was asked to engage with the relevant stakeholders and working groups (system and B2B working groups) to consider the viability of this issue and report back to the IEC. Should a change be needed to the B2B procedures, this could be picked up as part of the as-built B2B consultation to occur prior to 1 December 2017.

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
			• Noted that the SWG had been established and that they will be recommending technical solutions to systems to enable the B2B Procedure transactions. The system functionality will support the B2B procedures. • Noted that should any issues arise from the SWG that affects the B2B procedures and broader approach to B2B communications (i.e. one-to-many communication framework), these will be brought to the attention of the B2B Working Group and IEC for resolution and decision. • Noted that AEMO has begun drafting the technical specification but plan to incorporate recommendations from the SWG and feedback that comes via B2B Procedure consultation process. To date Pacific Hydro does not believe the IEC has been provided with any paper for resolution and the decision for removing the one to many communication frameworks. Pacific Hydro notes that amongst other obligations the IEC and its members must have regard to the National Electricity Objective and the B2B factors and consider the B2B Principles when determining whether a change to the B2B Procedures is warranted. Pacific Hydro contends that the proposed changes to New Connections to support these procedures fails to have regard to the following B2B factors: • the reasonable costs of compliance by AEMO and B2B parties with the B2B procedures compared with the likely benefits from B2B communications; and • the likely impacts on innovation in, and barriers to entry to, the market for services facilitated by advanced meters resulting from changing the B2B procedures. Pacific Hydro requests: • The procedures be amended to support backward compatibility (the use of one transaction to be raised by the Retailer of the purpose of effecting a New Connections); and • the Technical Specification to be revised to support backward compatibility.	

17	Pacific Hydro		**Service Order Types/Sub-Types** Pacific Hydro notes the Service Order Types and Sub-Types (initially identified in Section 2.1 Table 1 of the B2B procedures Service Order Process and subsequently throughout the procedure) differ significantly from the current Service Order Types and Sub-Types in use today. Pacific Hydro understands this wholesale change, to Service Order types and sub-types, is not specifically due to requirements for Power of Choice but rather for future proofing and clarifying the purpose of Service Orders. Pacific Hydro refers to IEC Meeting Papers – 26 July 2016 minutes of meeting Monday 27 June 2016 section 7 bullet point 1: **7. Changes to B2B framework** The Committee discussed the key design requirements for changes to B2B arrangements to support competition in metering and related services, and: • Reconfirmed the need to design the B2B procedures and e-hub to meet current and future requirements of the market so that it is the platform of choice for industry. The requirement was from all retailers, not just small, to ensure backwards compatibility. Pacific Hydro notes that, whilst the changes proposed appear to support competition in metering and related services and appear to meet current and future requirements of the market, Pacific Hydro does not believe these changes have taken into consideration the explicit requirement of the IEC to ensure backwards compatibility. Pacific Hydro notes that amongst other obligations the IEC and its members must have regard to the national electricity objective and the B2B factors and consider the B2B Principles when determining whether a change to the B2B Procedures is warranted. Pacific Hydro contends that the proposed wholesale changes to Service Order Types and Sub-Types fails to have regard to the following B2B factors: • the reasonable costs of compliance by AEMO and B2B parties with the B2B procedures compared with the likely benefits from B2B communications; and	Refer to the response provided for Item 16.

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
			• the likely impacts on innovation in, and barriers to entry to, the market for services facilitated by advanced meters resulting from changing the B2B procedures. Pacific Hydro proposes: 1. The Procedures are amended to accommodate Backward compatibility; and/or As part of its work on developing the Shared Market Protocol, AEMO undertake the appropriate analysis to provide an IT solution for a translation system that will support backward compatibility (allowing the use of the existing Service Order transaction sets).	

18	Blue NRG		**Service Order Types/Sub-Types** Blue NRG notes that the Service Order Types and Sub-Types (initially tabled in Section 2.1 Table 1 & throughout the procedure) differ significantly from the current Service Order Types and Sub-Types in use today. Blue NRG understands this wholesale change, to Service Order types and sub-types, is not specifically due to requirements for Power of Choice but rather for future proofing and clarifying the purpose of Service Orders. Blue NRG refers to IEC Meeting Papers – 26 July 2016 minutes of meeting Monday 27 June 2016 section 7 bullet point 1: 7. Changes to B2B framework The Committee discussed the key design requirements for changes to B2B arrangements to support competition in metering and related services, and: • Reconfirmed the need to design the B2B procedures and e-hub to meet current and future requirements of the market so that it is the platform of choice for industry. The requirement was from all retailers, not just small, to ensure backwards compatibility. Blue NRG notes that, whilst the changes proposed appear to support competition in metering and related services and appear to meet current and future requirements of the market, Blue NRG does not believe these changes have taken into consideration the explicit requirement of the IEC to ensure backwards compatibility. Blue NRG notes that amongst other obligations the IEC and its members must have regard to the national electricity objective and the B2B factors and consider the B2B Principles when determining whether a change to the B2B Procedures is warranted Blue NRG contends that the proposed changes wholesale changes to Service Order Types and Sub-Types fail to have regard to the following B2B factors: • the reasonable costs of compliance by AEMO and B2B parties with the B2B procedures compared with the likely benefits from B2B communications; and • the likely impacts on innovation in, and barriers to entry to, the market for services facilitated by advanced meters resulting from changing the B2B procedures. Blue NRG proposes:	Refer to the response provided for Item 16.

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
			1. The procedures are amended to accommodate Backward compatibility; and/or 2. As part of its work on developing the Shared Market Protocol, AEMO undertake the appropriate analysis to provide an IT solution for 'translation system that will support backward compatibility (allow the use of the existing Service Order transaction sets).	

19	Blue NRG		**Notified Party** The Service Order Procedures Draft Determination obligation for a participant to notify parties, other than the recipient of a Service Order, that a Service Order has been raised. For example this obligation exists in clauses 2.3 (c) and 2.3 (e) of B2B PROCEDURE: SERVICE ORDER PROCESS. ***2.3. Notified Party*** (c) The Initiator must identify and include details of Notified Parties using the NotifiedPartyID in the ServiceOrderRequest, unless the Initiator has elected to manage notifications to Notified Parties separately. And (e) The Initiator must notify Notified Party/s on: (i) Receipt of a positive *BusinessReceipt* for a ServiceOrderRequest from a Recipient; (ii) Receipt of a negative *BusinessAcceptance/Rejection* for a ServiceOrderRequest from a Recipient; (iii) Receipt of a ServiceOrderResponse from a Recipient; Blue NRG contends that the only obligation for a participant to notify a another party in relation to service works is prescribed in Part 5, Division 5, Section 104, of the NERR whereby the retailer is to notify the distributor after a remote de-energisation has completed and the reason for the de-energisation. ***104 Notification of de-energisation*** (2) If the retailer has arranged to de-energise a customer's premises remotely in accordance with the energy laws, the retailer must as soon as practicable after the de-energisation notify the distributor of the remote de energisation and the reason for the de-energisation, except where the de-energisation is as a result of the distributor's request. Blue NRG contends that this obligation is met at the completion of each service order when an MSATS transaction (Change Reason Codes: 3050/1 – Change Metering Installation Details or 5050/1 Change NMI) is generated by the Participant responsible for completing the Service Order request. Subsequently MSATS notifications for those change requests (see: Section 17 &	Refer to the response provided for Item 15.

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
			26 of the MSATS Procedures) will be sent to those participants who have a relationship with the NMI (notified parties). Blue NRG contends that the obligation to notify parties in the procedures falls outside of the Jurisdiction of the IEC and the B2B Procedures. Blue NRG notes significant investment was made by industry and a directive issued by the IEC to ensure the B2B Procedures include only material that is within its jurisdiction. Where additional material was included this would be as 'guidance notes'. Blue NRG requires the IEC to either: • Remove all references to notified parties from the Procedures; or • Amend the procedures to remove the obligation for a participant to notify parties but provide an option that allows a participant that chooses to use the B2B Procedures and the SMP for the purpose of notifying parties. For example: ***2.3. Notified Party*** (c) The Initiator ~~must~~ **may** identify and include details of Notified Parties using the NotifiedPartyID in the ServiceOrderRequest. and (e) The Initiator ~~must~~ **may** notify Notified Party/s on: (i) Receipt of a positive *BusinessReceipt* for a ServiceOrderRequest from a Recipient; (ii) Receipt of a negative *BusinessAcceptance/Rejection* for a ServiceOrderRequest from a Recipient; (iii) Receipt of a ServiceOrderResponse from a Recipient;	

20	Blue NRG		**New Connections** Prior to the introduction of Power of Choice, the B2B process to effect a New Connection required the raising of a single Service Order. This was an efficient process and met regulatory timeframes for the completion of such services. Blue NRG recognises Power of Choice will introduce complexities in New Connections as there are now (potentially) more parties involved in the process. The new procedures require a Retailer to raise and manage at least 3 Service Orders, in various sequences and processes that are different across Jurisdictions and potentially DNSPs, to effect the same outcome as the current single Service Order. These procedure changes increase complexity, exceptions, cost to serve and potentially impacts the outcome for the end use consumer. Blue NRG notes that, whilst the changes proposed appear to support competition in metering and related services and appear to meet current and future requirements of the market, Blue NRG does not believe these changes have taken into consideration the explicit requirement of the IEC to ensure backwards compatibility. There is no option for a Retailer to send a single transaction, for example to a Metering Co-ordinator, to effect a New Connection. There is also no option for a Retailer to send a single transaction to the B2B Hub and rely on the B2B e-Hub to interact with the relevant parties. As late as November 2016 the IEC were expecting a solution that provided the capabilities for 'one-to-many' transaction processing. The IEC Minutes from the November 9 meeting (6.5. B2B procedures – timetable and approach) noted that expectations were for one-to-many transactions to be developed and delivered as part of the work undertaken by the SWG. Blue NRG notes that the IEC endorsed a timetable and approach to complete the draft B2B procedures to be released for consultation on 23 December 2016. In discussing this item, the Committee: • Raised questions around the proposed system's ability to support the draft B2B Procedures specifically "one to many" transactions and message acks/nacks; • Noted that the Systems Working Group had been established and that they will be recommending technical solutions to systems to enable the B2B procedure transactions. The system functionality will support the B2B procedures.	Refer to the response provided for Item 16.

			• Noted that should any issues arise from the SWG that affects the B2B procedures and broader approach to B2B communications (i.e. one to many communication framework), these will be brought to the attention of the B2B Working Group and IEC for resolution and decision. • Noted that AEMO has begun drafting the technical specification but plan to incorporate recommendations from the SWG and feedback that comes via B2B procedure consultation process. To date Blue NRG does not believe the IEC has been provided with any paper for resolution and decision removing the one to many communication framework. Blue NRG notes that amongst other obligations the IEC and its members must have regard to the National Electricity Objective and the B2B factors and consider the B2B Principles when determining whether a change to the B2B Procedures is warranted. Blue NRG contends that the proposed changes to New Connections to support these procedures fail to have regard to the following B2B factors: • the reasonable costs of compliance by AEMO and B2B parties with the B2B procedures compared with the likely benefits from B2B communications; and • the likely impacts on innovation in, and barriers to entry to, the market for services facilitated by advanced meters resulting from changing the B2B procedures. Blue NRG requires: • The procedures to be amended to support backward compatibility (the use of one transaction to be raised by the Retailer of the purpose of effecting a New Connections); and • the Technical Specification to be revised to support backward compatibility. ***Notes:*** ***B2B factors*** The following factors: (a) the reasonable costs of compliance by *AEMO* and *B2B Parties* with the *B2B Procedures* compared with the likely benefits from *B2B Communications*; (b) 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*; and	

Item	Participant Name	Issue for Consultation	Comments	B2BWG Comment
			(c) 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 National Electricity Objective, as stated in the National Electricity Law, is:*** *to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to – price, quality, safety, reliability, and security of supply of electricity; and the reliability, safety and security of the national electricity system.*	
21	VECTOR AMS	N/A	Overarching comment VectorAMS recommend industry discussion and clarification surrounding the role of the NSW B2B Procedures in conjunction with the suite of B2B Procedures. VectorAMS regard the POC change process should consider the NSW B2B Prcoedures and incorporate any transactions that have not been identified during the market POC / IEC consultation process.	The IEC notes the respondent's submission, however NSW B2B is not in scope for this consultation and do not fall under the IEC's remit.

Procedures Comments

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
22	Momentum Energy		Can a tier 2 be nominated/act as the RoLR in case of an occurrence? What is the eligibility criteria to acts a RoLR?	Question	The IEC notes the respondent's question, however this is not within the IEC remit and refers the participant to the AER ROLR guidelines for further details.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
23	Pacific Hydro	1.1	Suggest the following rewording: This Procedure defines standard processes and transaction data requirements, which enables participants: (a) to request defined services ("Service Orders"), (b) to receive confirmation the requested work will or will not be undertaken (or attempted), (c) the work has or has not been completed as requested	Change	The IEC note the respondents suggested change, however has decided that current draft wording sufficient, therefore no change is made.
24	Pacific Hydro	1.2	Suggest the following rewording: (b) In some instances B2B communications can only be initiated by a nominated role in the NEM and therefore they have been specified in this Procedure.	Editorial correction	The IEC agrees, the B2B Procedure updated with the suggested change.
25	ActewAGL	1.2 (a)(iii)	This should be its own dot point not under (a), so move this to new (c)	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
26	Aurora Energy	1.2 (b)	In some instances certain B2B communications can only be initiated by certain role in the NEM and therefore have been specified in this Procedure. Aurora Energy comment: need to add an "a" or change to "roles"	Editorial correction	Refer to the response provided for Item 24.
27	Energy Australia	1.4	We note Unmetered Supply has been removed from the Exclusions section. We would think this should be included in this section.	Change	The IEC does not agree with the suggested change. B2B Procedures are used in some Jurisdictions to manage service related to Unmetered Supply. This change does not prevent parties to seek alternate arrangements for managing Unmetered Supply.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
28	AGL	1.5	Guidance Notes Suggest amend sentence to recognise that these timing obligations support good practice or obligations to do something as soon as practicable (as required by the NER etc.): A number of timing requirements that represent common industry practice have also been included. These timings are not associated with the communication of B2B transactions, but have been included as good industry practice and / or to support participants in meeting obligations arising from other instruments, but do not have a head of power and are not enforceable.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
29	AGL		Guidance Notes GN1 – Suggest re-write as This is an accepted or common industry practice that does not have a direct reference to a specific legal or jurisdictional requirement	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
30	AGL		Guidance Notes Suggest that the order of Guidance Notes be Reviewed and aligned in a logical sequence – e.g. 1. Industry Practice 2. NER 3. NERR 4. Vic Distribution Code / Vic Energy Retail Code 5. AEMO Procedures	Change	The IEC note the respondents suggested change, however has decided that current drafting order is sufficient, therefore no change is made.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
31	AGL		Guidance Notes GN3 – Suggest Remove - GN6 – Suggest re-write as AEMO Procedures ~~Service Level Procedures: Metering Provider Services~~ This is because there are more procedures referenced within the B2B procedures than just this one.	Change	The IEC note the respondents suggested change, however has decided is more helpful to identify each guidance note reference, therefore no change is made.
32	AGL		Guidance Notes A statement is required that clarifies that anything in the B2B procedures that is not covered by a guidance note, should be considered as within the jurisdiction of the B2B procedures and thus enforceable.	Change	The IEC note the respondents suggested change, however has decided the obligations made under the *Rules* regarding the application of B2B communications are sufficient and do not need to be restated. No change is made to the Procedures.
33	Jemena	Guidance Notes	Clause 7.3.1(b)(2) Places an obligation on the Metering Coordinator to perform its role in accordance with Ch7 of the Rules AND the Procedures authorised by the Rules. Therefore activities that the MC conduct on behalf of the retailers (as their contracted agent or as an active role) must conform with the provision outlined in the Procedures. This in effect gives a head of Power to the [GNs] identified, as obligations that a Retailer/MC must perform under the CSDN Procedures. As a consequence these Guidance notes should be translated into direct obligations. This obligation is separate to the B2B Communications section of the new Chapter 7 and appears to have been ignored by the AEMO legal; advice to the IEC of the 2nd November.	Change	The IEC recognised the inclusion of additional material is solely for the purposes of assisting participants to understand their related legal obligations or industry accepted business practices. For clarity the B2B Working Group, with the assistance of AEMO, was asked to identify and detail the source of each rule or other legal obligation that will be redrafted as a 'Guidance Note' as per the directive provided by the IEC.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
34	Powershop	2.1 Table 1	Powershop is of the opinion that the amount of change detailed in the B2B Service Order Process is beyond the scope of change required for Power of Choice (POC). Powershop observes that there is significant changes to the service order type and sub-type (detailed in section 2.1, table 1) in comparison to the current service order type and sub-type. With the aforementioned in mind Powershop request that the procedures are amended to support backward compatibility and AEMO undertake a review of market systems to provide a technology solution that will allow old service orders to be translated to the new service order types and sub-types to ensure a seamless transition and to adhere to the original requirements of backward capability. A failure to provide backward compatibility would be inconsistent with the objectives of the project and in particular fails to support the NEO, the B2B principles, B2B factors and the directions given by the IEC.	Change	Refer to the response provided for Item 15.
35	UED	2.1	**Table 1 – Re-Energisation**: UE believes that the Re-En Sub-types (Methods) should be made consistent with the De-En Subtypes - See UE's comments on section 4.1 Table 11.	Change	The IEC notes the respondent's comments, re-instating re-energisation service order sub-types was done as a result of feedback from the initial draft consultation to minimise impact on participants (particularly for high volume transactions like re-energisation) to support the POC reforms. The IEC sees benefit in having consistency in the procedures, but deem this can be further considered after implementation.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
36	CitiPower Powercor	2.1	**Table 1 – Meter Investigation** **CitiPower Powercor recommends that for consistency with other transactions the Meter Investigation sub types are included in the sub type column along with a Description for each, similar to the format used for Re-energisations and De-energisations sub types.**	Change	The IEC notes the respondents and agrees the service order sub types for Meter Investigations are not comprehensive. The IEC has decided to maintain the proposed structure within the Metering Service Works Service Order to include the following sub types; • Meter Investigation – Inspect; • Meter Investigation – Meter Test The previous investigation code of 'Tamper' has not been reinstated.
37	CitiPower Powercor	2.1	**Table 1 – Meter Investigation "Transposition' sub type** **CitiPower Powercor recommends the introduction of a new sub type of 'Transposition' to the Meter Investigation transaction. This sub type would be used between a Retailer and a DB, typically for multi occupancy sites where the Distributor has a holistic view of all NMI's and can investigate the transposition on multiple meters.**	Change	The IEC notes the respondent's request for a new sub type, however, no change made to the Procedure. Not enough information about the likely volumes or processes have been provided to adequately assess and determine if this type of sub type would/should be subject to any pre-conditions (if any) to determine use and outcome. Suggest a Miscellaneous Service request be used for rare scenarios like this.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
38	CitiPower Powercor	2.1	**Table 1 – De-Energisation sub type 'Meter Tails'** **CitiPower Powercor opposes the introduction of the 'Meter Tails' sub type for the De-energisation transaction for the following reasons:** **1. Meter installer may not be licensed to do live work, therefore should be using an upstream isolation point;** **2. Results in cables sitting unterminated under the terminal cover – which presents a safety risk;** **3. Creates a potential safety risk when reinserting / re-energising the site.**	Change	The IEC agrees, the B2B Procedure will be updated to remove "Meter Tails as a De-energisation sub type.
39	CitiPower Powercor	2.1	**Table 1 – De-energisation sub type 'Meter Isolation'** **CitiPower Powercor opposes the introduction of the 'Meter Isolation' sub type for the De-energisation transaction as neither the Retailer nor any other participant (including the Distributor) will have this information recorded in their system. The only way to know when this is possible is when on site.**	Change	The IEC agrees, the B2B Procedure will be updated to remove "Meter Isolation as a De-energisation sub type.
40	CitiPower Powercor	2.1	**Table 1 – Re-energisation sub type 'New Reading Required'** **The description for this sub type states 'Where a retailer wants a reading taken, rather than a deemed meter reading', does this only apply to manually read meters? Greater clarity is required that this sub type would not be used for interval meters.**	Change	The IEC agrees, the B2B Procedure will be updated with the suggested change to clarify this applies for manually read meters.
41	CitiPower Powercor	2.1	**Table 1 – Service Order Type 'Re-Energisation'** **CitiPower Powercor recommends the Re-energisation sub types (Methods) be made consistent with the De-energisation sub types. The two transactions should have a 1 to 1 relationship, (i.e. if the Initiator requests a 'Remote' De-energisation then the Initiator of the Re-energisation should also request a 'Remote'.**	Change	Refer to the response provided for Item 35.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
42	Endeavour Energy	2.1	Table 1 Service Order Types and Sub Types Endeavour's submission for the first stage consultation asked for a new sub type of Move In to be added to Re-En SO's. Refer to item 156 in the responses document, as it indicates the change was accepted however, it hasn't been included in the published version of the SO procedure.	Change	Endeavour first stage response; "*Reinstate the SO subtypes for Re-energisation*" and "*Add new sub types of 'Remote' and 'Move In'*". First stage response reflected B2BWG decision; "*Change accepted and procedure changed to include Re-En Service Order sub types.* *In addition to existing sub types being re-instated:* • *After Disconnection For Non-Payment* • *Retrospective Move-in* • *New Reading required* • *Sticker Removal* *The following new Re-En sub types have also been included:* • *Remote* • *Physical Visit* • *Recipient Discretion*" Re-En SO sub type "move-in" was not added as a Re-En sub type in the last draft of the SO Procedures. The IEC has agreed to this change and has included "Move in" as a re-energisation sub type.
43	Endeavour Energy	2.1	Table 1 has de-energisation – "supply isolation" in strikethrough text. The strikethrough needs to be removed.	Editorial	IEC agree, Procedure updated.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
44	Endeavour Energy	2.1	Table 1 Capital 'I' required for Initiator Tariff Change | DNSP is requested to change the Network Tariff. | This is used where the initiator wishes to change the tariff. Where a meter is required to be reconfigured, a Metering Service Works – Meter Reconfiguration SO should be raised.	Editorial grammar	IEC agrees, Procedure corrected.
45	Endeavour Energy	2.1	Table 1 Add the word 'remove' to the highlighted sentence i.e. DNSP is requested to remove the service… Supply Abolishment | DNSP is requested to the service line/cable as supply is no longer required. This involves decommissioning a *NMI*. | For example, where a building is to be demolished and a *supply* is no longer required or supply to the NMI is no longer required at the customer's premise. Note: No De-energisation request is required unless it is to occur prior to the *supply* abolishment.	Editorial	IEC agree, Procedure updated.
46	Endeavour Energy	2.1	Table 1 Capital 'R' required on Required for an already Energised Site. New Reading required | Where a retailer wants a reading taken, rather than a deemed meter reading.	Editorial	IEC agree, Procedure updated.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
47	Endeavour Energy	2.1	Table 1 The word 'is' is missing from the highlighted sentence i.e. This code is used to…. Sticker Removal | This code used to re-energise a Site that has been de-energised using a sticker (i.e. not physically de-energised). The DNSP will visit the Site, take a meter reading, and remove the sticker if necessary. This is used for NMIs located in South Australia. | Examples: • Customer is moving into a premises	Editorial	IEC agrees, Procedure corrected.
48	Endeavour Energy	2.1	Table 1 Capitalise – Disconnect at Pole Top, Pillar Box or Pit Disconnect at pole top, pillar box or pit | A physical disconnection of the service mains at the connection to the network for non-payment.	Editorial	IEC agrees, Procedure corrected.
49	Endeavour Energy	2.1	Table 1 Remove non-payment from the description Disconnect at pole top, pillar box or pit | A physical disconnection of the service mains at the connection to the network for non-payment.	Change	IEC agree, Procedure updated.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
50	Endeavour Energy	2.1	Table 1 Insert the word 'fuse' into the sentence below to read 'The Initiator requires the physical removal of either the meter fuse or supply fuse' Remove Fuse — The initiator requires the physical removal of the either the meter or supply fuse	Editorial	IEC agrees, Procedure corrected.
51	Endeavour Energy	2.1	Table 1 Remove '.)' at the end of the description Meter Tails — Removing tails from the meter terminals under the meters sealed cover).	Editorial	IEC agrees, Procedure updated.
52	Endeavour Energy	2.1	Table 1 Capitalise – Recipient Discretion Recipient discretion — Where standard practise applies	Editorial	IEC agrees, Procedure updated.
53	Endeavour Energy	2.1	Table 1 Capitalise – Final Read Final read — Used when a reading is required for preparing a final bill for the Customer.	Editorial	IEC agrees, Procedure updated.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
54	Endeavour Energy	2.1	Table 1 Amend highlighted wording for sentence to makes sense to 'A need to investigate can arise where….' Meter Investigation | The Initiator requires an investigation of a *metering installation*. The initiator must provide additional information in the special instruction where a Service Order Sub Type of Meter Investigation is used. | Examples: Need to investigate a can arise where: • A Customer raises a request with their Retailer to investigate a meter fault; or • The Retailer has grounds to proceed with an investigation. • A Customer believes there is a problem with the *metering installation*. A Retailer may request an investigation for example, on the grounds of suspected fraud/tampering or consistently abnormal meter readings.	Editorial	IEC agrees, Procedure updated.
55	Endeavour Energy	2.1	Table 1 Correct typo – devise should be device Install Controlled Load | The Initiator requires the installation of Controlled Load equipment. | Installation of a controlled devise. For example, hot water, pool pump.	Editorial	IEC agrees, Procedure corrected.
56	Momentum Energy	2.1 Table 1	What is the difference between Service Order Sub Type "New Reading required" & "Physical Visit" For Re-energisation, whenever a physical visit is required a New reading will be taken irrespective, so what is the difference between the two?	Change	The IEC notes the respondent's comments, however there are scenarios where a physical visit is required and no reading will be taken. No change has been made to the Procedure. For Example, where a DNSP goes to site for a 4a meter.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
57	Momentum Energy	2.1 Table 1	Can a generic Service Order Type "Metering Service Works" raises where description of meter is unavailable in MSATS such as if it is a Phase 1 or Phase 3 Meter	Question	The IEC notes the respondent's question. Specific Service Order Sub Types have been identified as mandatory for Metering Service Works. A Miscellaneous Service Order is available where the initiator may not have all the information required however still requires to communicate with their service provider.
58	ActewAGL	2.1	Table 1 – Supply Service Works: Allocate NMI Reword description of use Used where the Initiator~~*retailer*~~ wants the Site registered in MSATS with the nominated *retailer* as the Current FRMP at the time of *NMI* allocation.	Change	The IEC notes the respondent's comments and decided that no change is required. In this scenario, only a Retailer can raise this type of request.
59	ActewAGL	2.1	Table 1 – Supply Service Works: Supply Abolishment Reword description DNSP is requested to remove the service line/cable as supply is no longer required. This involves decommissioning a NMI.	Editorial	IEC agrees, Procedure updated.
60	ActewAGL	2.1	Table 1 – Supply Service Works: Temporary Isolation Correct terminology and capitals with Re-energisation and De-energisation	Editorial	IEC agrees, Procedure updated.
61	ActewAGL	2.1	Table 1 – Re-energisation: New Reading required Reword whole description for better meaning and clearer use Where a retailer is uncertain about the energisation status but wants end status energised and a reading taken, rather than a deemed reading [or a Special Read Service Order].	Change	Refer to the response provided for Item 40.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
62	Aurora Energy	2.1 Table 1	Supply Service works Aurora Energy comment: The way this has been set out it implies that users can send out blank sub type which is incorrect and while I understand why it has been done like this, it could be misinterpreted	Comment	The IEC notes the respondent's comments and has updated Table 1 to remove any ambiguity.
63	Aurora Energy	2.1 Table 1	Re-energisation Remote - Where the initiator requires re-energisation not requiring a physical visit to the customer's premises Aurora Energy comment : Needs to state when the site has been remote DE EN only	Change	The IEC notes the respondent's comments, however no change to the Procedure. The status cannot always be confirmed by prospective retailer as MSATS is not updated real time.
64	Aurora Energy	2.1 Table 1	Disconnect at pole top, pillar box or pit Aurora Energy comment: This is not consistent with table 11 should read Disconnect at Pillar-Box PitOrPole-Top	Editorial	IEC agrees, Procedure updated.
65	Aurora Energy	2.1 Table 1	De-energisation Disconnect at pole top, pillar box or pit - A physical disconnection of the service mains at the connection to the network for non-payment Aurora Energy comment: Remove for non payment as this indicates this can only be used for non payment and this is not the case.	Change	IEC agrees, Procedure updated.
66	Aurora Energy	2.1 Table 1	De-energisation Remove Fuse The initiator requires the physical removal of the either the meter or supply fuse Aurora Energy comment : Remove the meter as this indicates this a common practice	Change	IEC agrees, Procedure updated to indicate removal of supply fuse only.
67	Aurora Energy	2.1 Table 1	De-energisation Remote Aurora Energy comment : Need to state on a Comms enabled or Type 4 meter only	Change	The IEC notes the respondent's comments, however does not agree with the suggested change, the current drafting is adequate.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
68	Aurora Energy	2.1 Table 1	De-energisation ~~Supply Isolation Isolation of the supply point.~~ Aurora Energy comment : Needs to be removed from table as on previous page	Editorial	Refer to the response provided for Item 43.
69	Aurora Energy	2.1 Table 1	De-energisation Meter Tails - Removing tails from the meter terminals under the meters sealed cover). Aurora Energy comment : Remove bracket	Editorial	IEC agrees, Procedure updated.
70	Aurora Energy	2.1 Table 1	Special Read Check Read - or example, used to obtain a Special Read (rather than a scheduled read) arises where an out of cycle reading is required. Aurora Energy comment : This is a poor example – better to use "when customer requests a check meter read after an estimated read"	Change	The IEC notes the respondent's comments, however IEC has decided not change this existing example.
71	Active Stream	2.1	Table 1 – Supply Service Works – Supply Abolishment Reinstate the word abolish in the definition column.	Change	Refer to the response provided for Item 59.
72	Active Stream	2.1	Table 1 Special Read: if a Retailer needs an initial meter read for a move in what subtype would they select? Suggest reviewing and amending accordingly Special Read Sub types.	Change	The IEC has decided not to make the suggested change. The Service Order Procedure now include Re-energisation sub type 'Move-in' and clarified the existence of a <*blank*> Special Read requests.
73	VECTORAMS	2.1	Table 1, headings Refers to 'Metering Reconfirmation', should 'Meter Reconfiguration"	Editorial	IEC agrees, Procedure corrected.
74	VECTORAMS	2.1	Table 1, Metering Service Works VectorAMS recommend the inclusion of a new B2B Metering Service Works Subtype 'ReSeal Device' to allow for the situation, as an example, of where a Retailer becomes advised a meter and /or MIL seal has become legitamentally broken and requires repair by current MPB.	Change	The IEC agrees, the B2B Procedure updated with the suggested change. Feedback sought and received from participants in Queensland confirmed significant volumes justified (1800 over the last two months) inclusion.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
75	VECTORAMS	2.1	Table 1, Supply Service Works VectorAMS recommend the definition of Supply Service Work Subttype: 'Establish Permanent Supply' be amended to 'DNSP is requested to arrange a permanent supply to a new connection point'	Change	The IEC does not agree with the suggested change to the Procedure, instead opted to update the B2B guide with further clarification.
76	VECTORAMS	2.1	Table 1, Supply Service Works VectorAMS recommend the definition of Supply Service Work Subttype: 'Establish Temporary in Permanent' be amended to: 'DNSP is requested to arrange a temporary supply to the permanent connection point'	Change	The IEC does not agree with the suggested change to the Procedure, instead opted to update the B2B guide with further clarification.
77	VECTORAMS	2.1	Table 1, Supply Service Works VectorAMS believe it is unclear whether Metering Service Works Subtype 'Change Timeswitch Settings' is used to change controlled load timings in a DB's Type 5 or type 6 meter asset or an external device in the *metering installation* or wheather this indicates a reprograming of a Smart Meter. Note: Previous versions of the B2B Service Order Procedures indicate that Change Timeswitch settings' was a subtype of Meter Reconfiguration which now applicable only to remote services.	Comment	The IEC notes the respondent's comments, however no change has been made to the Procedure. The procedure will continue to allow participants to determine the use of this sub type with their service provider.
78	VECTORAMS	2.1	Table 1, Supply Service Works VectorAMS request clarification of the 'blank' subtypes.. Is this in fact reference to, or lack of, a blank subtype? If so, VectorAMS recommend inserting '<blank>' in this field	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
79	TasNetworks	2.1	Table 1 Supply abolishment description missing the word "remove" between "to" and "the" in the first line	Editorial	Refer to the response provided for Item 59
80	TasNetworks	2.1	Table 1 De-energisation Disconnect at pole top, pillar box or pit needs to have Non-payment removed from description	Change	Refer to the response provided for Item 65

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
81	AusNet Services	2.1	AusNet Services welcomes the re-introduction of sub-types for De-energisation, however there is concern that some of the subtypes listed ("Local Meter Disconnection" and "Meter Tails") would appear to contravene established safety rules/regulations within Victoria. AS3000 does not allow "Meter Tails" the wires behind the meter board are not considered in an enclosure. We therefore suggest that the jurisdiction for these types is detailed in the Procedures as is the case for the "Sticker Removal" re-energisation subtype for South Australia, if there is a jurisdictional safety regulator that supports the use of these subtypes.	Comment	The IEC agrees to remove "Meter Tails as a De-energisation sub type, however has chosen to retain the sub type 'Local Meter Disconnect', as there may be a legitimate reason (for example communication failure) to attend a site.
			The description for Supply Service Works - Supply Abolishment does not describe the service and needs to be corrected. It is assumed that it should read "DNSP is requested to abolish the service line/cable as supply is no longer required. "	Change	Refer to the response provided for Item 59.
			The re-energisation requests for "Retrospective Move-in", "New Reading required", and "Special Read" blank subtype are requesting the exactly the same service of meter reading and are not requesting a re-energisation. We recommend consolidating to just a "Special Read". It is wasteful to introduce two new duplicate subtypes that every B2B Party will have to build systems to process and consolidate each of these duplicate subtypes.	Change	The IEC disagrees with the suggested change. The IEC has decided to retain sub-types as they are as these support current business practice.
			AusNet Services considers the industry has unnecessarily rearranged most the sub-types to introduce "Metering Services Works" and "Supply Service Works" and associated subtypes. Although the new arrangement is logical, we note that there has not been a cost benefit justification for this high impact change to the existing structure of the B2B Procedures that has met the needs of the industry since the introduction of FRC. Every change to B2B Procedures increases the incremental cost of Participant system implementation and it is more change than we reasonably expected in early 2016 when AEMO was suggesting the B2B Procedures did not need changing to introduce metering contestability.	Comment	Refer to the response provided for Item 16.
82	AGL	2.1	Table 1 After disconnection for non-payment "description of use" adds no value and is therefore not required	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
83	AGL	2.1	Table 1 Re-energisation and De-energisation Recipient discretion Description required. Suggest: "The recipient will re/de-energise the site in the most efficient manner at the recipient's discretion"	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
84	AGL	2.1	Table 1 Meter Investigation examples grammar replace "Need to investigate a can arise where" With "A need to investigate can arise where"	Editorial grammar	The IEC agrees, the B2B Procedure updated with the suggested change.
85	AGL	2.1	Table 1 – Supply Abolishment Undelete the word abolish from description	Change	Refer to the response provided for Item 59.
86	AGL	2.1	Table 1 – After Disconnection for Non-payment Should the description be amended to "A physical re-energisation…' to distinguish it from a remote service	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is adequate. Re-energisation after disconnection may be performed remotely.
87	AGL	2.1	Table – Re-Energisation Does there need to be a 'Remote Re-energisation after Disconnection for Non-Payment' or is the existing SO 'after Disconnection for Non-Payment' satisfactory?	Question	No change, refer to the response provided for Item 86.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
88	AGL	2.1	Table 1 – Special read Two sub-categories (Start and Opening) have been removed. Which sub-type is preferred for winning a customer by a prospective retailer? Some indications are no sub type is used. The current enumerations are not suitable for a prospective retailer. Note that the CR 10xx with Special Read read code does not initiate the service order	Comment	The IEC notes the respondent's comments, however no change has been made to existing practice.
89	AGL	2.1	Table 1 – Remove Meter A Supply Abolishment may not be required in all circumstances e.g. – relocating metering installation with a new MP. Suggest amending the description to indicate that a Supply Abolishment should be used if energy no longer required at site.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is adequate. *"Remove redundant meters.* *A Remove Meter used to remove the last meter on Site should be accompanied with a Supply Abolishment sent to the DNSP."*
90	AGL	2.1	Table 1 – Controlled Load Grammar – change devise (spelling) to 'load'.	Editorial grammar	IEC agrees, Procedure corrected.
91	SA Power Networks	2.1 – Table 1	Re-enegisation – Sticker Removal Stickers are no longer used with SA and specific references are no longer required or relevant within the Service Order Procedure. Change Required - Last sentence within the decription field can be removed – "This is used for NMI's located in South Australia".	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
92	SA Power Networks	2.1 – Table 1	De-enegisation – The following Sub Type codes should be removed – - Meter Isolation - Meter Tails Where this method is possible and provided by a service provider then "Recipient Discretion" should be used.	Change	Refer to the response provided for Item 38 and Item 39.
93	Energy Australia	2.1 (Table 1)	It has been noted that with the re-introduction of the Re-energiation sub types, there is a Sticker Removal Sub Type (SA only), however there is no equivalent 'Sticker' option for De-energisation. We would like clarity on what circumstances would eventuate in a sticker being used by a DNSP to de-energise premises given there is no transaction indicating a sticker can be used to de-energise premises/supply.	Change	Refer to the response provided for Item 91. The IEC agrees, the B2B Procedure updated with the suggested change to remove sticker as a sub type.
94	Energy Australia	2.1 (Table 1)	Supply Isolation. This has been struck through, but we assume the line needs to be removed	Editorial correction	Refer to the response provided for Item 43.
95	Energy Australia	2.1 (Table 1)	The description for a Remove Meter is " used to remove the last meter on site should be accompanied with a Supply Abolishment sent to the DNSP". EA's preference is that in the case of a supply abolishment is a single Supply Abolishment Service Order is raised (i.e. current industry process), we will utilise the notified party functionality to ensure the MP is aware of their meter being removed so they can arrangement for collect We see this as a much more efficient process and negates having to document or call out any variances regarding meter types (i.e. Type 4 vs a Type 5/6). The Supply abolishment being sent direct ot the DNSP also ensures an element of safety in the supply abolishment process.	Change	The IEC notes the respondent's comments, no change required as B2B Procedures permit and can be used to support bilateral arrangements.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
96	Red Energy & Lumo Energy	2.1 (Table 1)	Supply Service Works: Supply Abolishment - update wording: DNSP is requested to remove the service line/cable as supply is no longer required.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
97	Red Energy & Lumo Energy	2.1 (Table 1)	Re-energisation: New Reading Required – update spelling of retailer to Retailer	Editorial correction	IEC agrees, Procedure corrected.
98	Red Energy & Lumo Energy	2.1 (Table 1)	Re-energisation: Physical Visit – update spelling of retailer to Retailer	Editorial correction	IEC agrees, Procedure corrected.
99	Red Energy & Lumo Energy	2.1 (Table 1)	Re-energisation: Sticker Removal – update description: Where a Retailer requires a re-energisation for a Site that has been de-energised using a sticker.	Editorial correction	IEC agrees, Procedure corrected.
100	Red Energy & Lumo Energy	2.1 (Table 1)	De-energisation: Remove Fuse - update spelling of initiator to Initiator	Editorial correction	IEC agrees, Procedure corrected.
101	Red Energy & Lumo Energy	2.1 (Table 1)	De-energisation: Remote - update spelling of initiator to Initiator	Editorial correction	IEC agrees, Procedure corrected.
102	Red Energy & Lumo Energy	2.1 (Table 1)	De-energisation: Meter Tails – remover bracket closure ‘)’ at end of description	Editorial correction	IEC agrees, Procedure corrected.
103	Red Energy & Lumo Energy	2.1 (Table 1)	Metering Service Works: Move Meter - update spelling of initiator to Initiator	Editorial correction	IEC agrees, Procedure corrected.
104	Red Energy & Lumo Energy	2.1 (Table 1)	Metering Service Works: Meter Reconfiguration - update spelling of initiator to Initiator (in Description); update spelling of retailer to Retailer (in Description of use)	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
105	Red Energy & Lumo Energy	2.1 (Table 1)	Metering Service Works: Meter Investigation - update spelling of initiator to Initiator (in Description); update Description of use statement – Need to investigate where (remove "a can arise")	Editorial correction	IEC agrees, Procedure corrected.
106	Jemena	Table 1	Supply Abolishment description editorial, replace: "DNSP is requested to the service line/cable as supply is no longer required. " With "DNSP is requested to **remove** the service line/cable as supply is no longer required. "	Change	IEC agrees, Procedure updated.
107	Jemena	2.1 Table 1	Jemena is of the view that there should be consistency between the Re-en and De-en subtypes. There is also a case for simplifying the subtypes	Change	Refer to the response provided for Item 35.
108	Active Stream	2.1(b)	There a requirement to identify Re-energisation due to DNP irrespective to the method (physical or emote Situation where a customer has been De-energised remotely for DNP and a remote Re-energisation is not possible at the time of request. Suggest that this would require a prioritisation from the MP over other Re-energisations but how would they know, if it is assumed that they only receive a remote subtype for Re-energisation?	Change	Refer to the response provided for Item 35.
109	Red Energy & Lumo Energy	Re-energisation – New reading required	Red and Lumo do not support this sub-type being added in the Re-en type. We consider that this sub-type should be in special read.	Change	The IEC notes the respondent's comments, however this change was added to provide the Service Order initiator greater flexibility, therefore no change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
110	Red Energy & Lumo Energy	Re-energisation – Retrospective Move-in	Red and Lumo do not support this sub-type being added.	Change	The IEC notes the respondent's comments, however this change was added to provide the Service Order initiator greater flexibility, therefore no change.
111	Red Energy & Lumo Energy	Re-energisation – Sticker removal	Red and Lumo consider that should a sticker be used as a type of disconnection it will require a physical site visit for the reconnection. Red and Lumo do not support this sub-type being added.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
112	Red Energy & Lumo Energy	De-energisation	Meter Isolation – Isolation at the meter point itself (Link/fuse/switch prior to the meter). Supply Isolation – Isolation of the supply point. Local Meter Disconnection – Attend site and open meter contactors. Meter Tails – Removing tails from the meter terminals under the meters sealed cover). Red and Lumo request that these 3 sub-types are combined and defined as: Local MP Disconnection – The meter provider attends site and disconnects at the meter, by either isolating, opening the contactors or removing tails from the meter terminal. We do not consider that the customer service consultants or service order teams need to understand the difference between these three sub-types. Retailers will only need to know that they need to send an MP to site to locally disconnect at the meter (e.g. where a customer is a type 4A and requires disconnection). Understanding the different electrical mechanisms to disconnect at the meter should be left to the discretion of the MP. Should retailers want to get to this level, then specifics should be provided in the special instructions field.	Change	The IEC agrees, the B2B Procedure will be updated with the suggested change. Also refer to the response provided for Item 38 and 39.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
113	Momentum Energy	Service Order Process 2.1 Table 1	There is no information present in MSATS regarding the previous De-energisation performed by the previous retailer (Remote or physical). In absence of such information the new retailer will not be informed to raise the appropriate Re-energisation, which could result in rejection of the service order raised by the new retailer. Can this be amended or added in MSATS to have the method of De-energisation specified in MSATS rather than just code 'D' which will help the next retailer to raise appropriate service order.	Change	MSATS Changes out of scope – No Change
114	Momentum Energy	Service Order Process 2.1 Table 1	MSATS should also provide information regarding sites which are off supply for more than 12 months in order to retailers to take informed decision regarding those sites.	Change	MSATS Changes out of scope – No Change
115	Momentum Energy	Service Order Process 2.1 Table 1	If a site is CT Metered site, it is not mentioned in MSATS, it leads to incorrect service order request as these sites require truck visit. Can this also be notified in MSATS	Change	MSATS Changes out of scope – No Change
116	Momentum Energy	Service Order Process 2.1 Table 1	MSATS should also provide information regarding type of meters for example: if they are 1 phase or 3 phase meters.	Change	MSATS Changes out of scope – No Change
117	Momentum Energy	Service Order Process 2.1 Table 1	Case when a meter is upgrading from 1 Phase Meter to 3 Phase meter, what would be hierarchy of the service orders to be raised.	Change	Two service orders with co-ordination required; A Supply Service Works and a Metering Service Works Service Order with relevant sub types.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
118	Red Energy & Lumo Energy	Special Read	As per above, request that a re-energisation or de-energisation read is required. Or the definition of check read could include the reason of move in / move out. However, this will require amendment to 2.2(b)(ii).	Change	The IEC notes the respondent's comments, however no change made as the current process is sufficient. A prospective retailer may not have sufficient information as to the status of the NMI.
119	Pacific Hydro	Table 1	Abolish supply has been removed and so the sentence no longer makes sense. Suggest the following: Supply Abolishment DNSP is requested to remove the service line/cable as supply is no longer required. This involves decommissioning a *NMI*.	Change	Refer to the response provided for Item 59.
120	Pacific Hydro	Table 1	For 'Sticker Removal' there is only one example; remove the 's' from 'Examples'.	Editorial grammar	IEC agrees, Procedure corrected.
121	Pacific Hydro	Table 1	For 'Recipient Discretion' for both re-en and de-en suggest 'Description' be updated to read: 'Used by the Initiator when the Recipient's standard practice is to be used.'	Change	The IEC disagrees with the suggested change, refer to the response provided for Item 83 for the accepted change.
122	Pacific Hydro	Table 1	Disconnect at pole top, pillar box or pit A physical disconnection of the service mains at the connection to the network for non-payment. Suggest the reference to non-payment be removed and this included in the 'Description of Use' as an example.	Change	Refer to the response provided for Item 49.
123	Pacific Hydro	Table 1	Meter Investigation Suggest the following rewording Examples: A need to investigate can arise where:	Change	IEC agrees, Procedure updated.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
124	Aurora Energy	Figure 1, & 4	Aurora Energy comment : indicated that a notified party gets a OWN on both positive and negative TACKS but only get them on a negative TACK	Comment	The IEC agrees, the figure diagrams in the B2B Procedure have been updated with the suggested change.
125	Aurora Energy	Figure 1,3 & 4	Aurora Energy comment: indicates the notified party is sent the service order OWN when sending the SO and not on the MACK as agreed.	Comment	Refer to the response provided for Item 124.
126	Pacific Hydro	2.2 (a)(ii)	(ii) Special Read (excluding ones with a *ServiceOrderSubType* of "Check Read"); There are only two ServiceOrderSubtypes for Special reads; Check Read and Final Read. Why would a Prospective Retailer be allowed to submit a final read for another Retailer's NMI? Also where the Prospective Retailer needs to raise a special read service order to transfer a NMI, the subtype is currently left 'blank'. Will this still apply from 1 December 2017 or should there be a subtype of Recipient Discretion added to the Special Read service order? Alternatively, and preferably, a subtype of 'Transfer' could be added.	Change	The IEC agrees, both Check Read and Final Read should be excluded for prospective Retailer. Yes, 'blank' will still be valid. Table 3 has been updated to provide further clarification. Table 4.1 for Special Read, Sub Type is unchanged, marked 'R/N'. The IEC disagrees with the suggested change for an additional sub type as the current wording and sub types are sufficient.
127	Aurora Energy	2.2 (b)	Metering Service Works ServiceOrderRequest, with a ServiceOrderSubType of Install Meter, Meter Reconfiguration; Aurora Energy comment: a prospective retailer cannot do metering works prior to winning the customer unless part of the new connection process.	Comment/ Change	The IEC notes the respondent's comments, however no change required to the Procedure. It is up to each participant responsible for meeting their obligations in the rules, the procedures cannot prevent any incorrect application of transactions.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
128	AGL	2.2 (b)	Should this statement be expanded to say … following ServiceOrderRequest with an expectation of them being completed prior to MSATS transactions being finalised. See Cl 2.16.1 Table 4 for a matrix of service orders which will be attempted for a prospective retailer.	Change	The IEC disagrees with the suggested change, however as elected instead to remove 'Meter Reconfirmation' from section 2.2 (b) (iv) as follows; Metering Service Works ServiceOrderRequest, with a *ServiceOrderSubType* of Install Meter, Exchange Meter; ~~Meter Reconfiguration~~ In addition, the Multiple Service Orders Scenario table has also been updated to provide direction under Scenario 7, where two Service Orders are received by a current and prospective retailer.
129	Jemena	2.2(i)	Should read: The final step of the process is when the Initiator sends the Recipient a BusinessAcceptance/Rejection transaction **of Accept or Reject** to the ServiceOrderResponse.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. No change has been made.
130	Active Stream	2.2 (b) (ii)	If the Special Read Sub Types are reviewed, then this clause needs to be amended, especially when a prospective Retailer has requested a Special Read to trigger a FRMP churn.	Change	Refer to the response provided for Item 126.
131	AGL	2.2 (b)(ii)	What Special Read type should be raised by a prospective retailer? Check and Final are not appropriate.	Change	Refer to the response provided for Item 126.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
132	Active Stream	2.2 (b)(iv)	Suggest the addition of sub type Metering Works – Exchange Meter to enable a MP to receive a B2B SO to schedule a meter exchange. It would allow a flexible process which may be used as Participants see fit for purpose and within market obligations. This would also support NER clause 7.8.9 (e) (1) and (2) which reads: *(1) an Incoming Retailer to nominate a Metering Coordinator, Metering Provider or Metering Data Provider to be appointed at a connection point in respect of which it is the Incoming Retailer, and for those appointments to be recorded as being effective on or, where requested by an Incoming Retailer, after the day that the market load at the connection point transfers to the Incoming Retailer as the new financially responsible Market Participant;* *(2) the installation of a new or replacement metering installation at a connection point as soon as practicable after the transfer of a market load at that connection point has been effected by AEMO.*	Change	The IEC agrees, the B2B Procedure updated with the suggested change. Section 2.2 (b) (iv) has been updated as follows; Metering Service Works ServiceOrderRequest, with a ServiceOrderSubType of Install Meter, Exchange Meter; ~~Meter Reconfiguration~~
133	AGL	2.2 (b)(iv)	Meter reconfiguration? – for new connections as opposed to existing connections – will the party make this change for a prospective retailer and complete it prior to MSAST being completed.	Question	Refer to the response provided for Item 128.
134	Endeavour Energy	2.2 (c)	Previous Retailer is not a defined term. Suggest including reference to Previous Retailer in section 4.3 Temporal References to Roles of the Glossary and Framework.	Change	IEC agrees, Procedure corrected, 'Previous Retailer' has been replaced with 'previous Retailer'.
135	AGL	2.2 (c)	Why is this clause not the subject to a guidance note like (b)?	Question	IEC agrees, Procedure updated.
136	Powershop	2.2 (d) [old clause no 2.2 (c)]	(d) If a DNSP is the MC for the NMI, then the Initiator must send any ServiceOrderRequest to the DNSP. If the DNSP is not the MC for the NMI, then the Initiator must send any ServiceOrderRequest to the appropriate Participant responsible for the required service. Not sure why this is phrased this way, shouldn't it simply say "servicer order requests must be sent to the appropriate participant in all cases".	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
137	Pacific Hydro	2.2 (d) [old clause no 2.2 (c)]	(d) If a DNSP is the MC for the NMI, then the Initiator must send any ServiceOrderRequest to the DNSP. If the DNSP is not the MC for the NMI, then the Initiator must send any ServiceOrderRequest to the appropriate Participant responsible for the required service. Where the service order is sent to the DNSP for services to be undertaken by the MC please clarify if the service order request is sent to the DNSP participant role/ID or the MC participant role/ID.	Change	Refer to the response provided for Item 136.
138	Active Stream	2.2 (d)	Post 1st Dec the DNSPs generally will not be receiving a Metering Works SO. This clause states send ServiceOrderRequest to the DNSP if the deemed MC is the DNSP. Otherwise, if the DNSP is no longer deemed MC- send to the participant role. That is, the Supply SOs should go to the LNSP/DNSP and the Metering B2B comms should go to the MP etc. This adds an additional burden to an Initiator to incorporate extra logic in the system and business processes for no apparent value. As the B2B is now a communications mechanism for all Participants to use there is an opportunity to build a generic streamlined logic which reflects no bias on any Participant, such that the B2B Transaction go to the responsible Participant role. Suggest removing the clause.	Change	Refer to the response provided for Item 136.
139	ActewAGL	2.2 (e)(ii)	Remove “and” at end of dot point	Editorial grammar	IEC agrees, Procedure updated.
140	ActewAGL	2.2 (e)(iii)	Insert “and” at end of dot point	Editorial grammar	IEC agrees, Procedure updated.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
141	Aurora Energy	2.2 (f)	(f) 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. Aurora Energy comment : Not sure why this has been removed	Comment	Section 2.4 Acknowledging Receipt of the Service Order addresses the actions for Service Order acceptance and rejection.
142	Endeavour Energy	2.2 (f)	Should be flagged as [Guidance Note 1] (f) 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.	Change	IEC agrees, Procedure updated.
143	ActewAGL	2.2 (f)	Capitalise Type 6	Editorial	IEC agrees, Procedure corrected.
144	AGL	2.2 (f)	Why is this limited to a type 6 meter only? This needs expansion so that the meter owner takes a meter reading and another party reads a type 6 meter.	Change	The IEC notes the respondent's comment and has amended this statement as a guidance note.
145	AGL	2.2 (h)	This statement needs further clarification. What is meant by this clause?	Question	The IEC disagrees, the current B2B Procedure drafting is sufficient.
146	Active Stream	2.2 (h)(ii)	Clause incomplete. Suggest additional wording for completion: 'Requires the work to be completed, **they must** raise a new ServiceOrderRequest (with a new ServiceOrderID);'	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
147	AGL	2.2 (h)(ii)	Insert word 'they must' before raise a new service order.	Editorial grammar	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
148	Active Stream	2.2 (k)	Capitalise 'i' in Initiator	Editorial correction	IEC agrees, Procedure updated.
149	AGL	2.2 (k)	This clause needs further clarification. Was this clause intended to ensure that if nominating a DNSP (or another party) as coordinating party agreement was reach prior to the SO being sent.	Question	The IEC agrees, the B2B Procedure updated with the following statement; "(k) The initiator must have agreement from the party being nominated as the coordinating party prior to initiating a service order."

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
150	Red Energy & Lumo Energy	2.2 General Principles	(iv) Metering Service Works ServiceOrderRequest, with a ServiceOrderSubType of install Meter, Meter Reconfiguration – delete ServiceOrderRequest	Editorial correction	IEC agrees, Procedure updated.
151	Red Energy & Lumo Energy	2.2 General Principles	(k) update spelling of: initiator – Initiator; and participant - Participant	Editorial correction	IEC agrees, Procedure updated.
152	Red Energy & Lumo Energy	2.2(b)(iv)	The NER does not preclude a prospective retailer from raising a service order for a meter exchange, but it does preclude a meter exchange taking place until they are the FRMP in MSATS. We consider that this clause needs to be updated to include a Exchange Meter to be permissible as a service order subtype for a prospective retailer. (iv) Metering Service Works ServiceOrderRequest, with a *ServiceOrderSubType* of Install Meter, Exchange Meter, Meter Reconfiguration;	Change	Refer to the response provided for Item 132.
153	AGL	General	Under POC a higher degree of coordination is required between participants where field work is performed that requires the metering provider and the LNSP. In many cases parties are reliant on each other's work status to schedule their own work. For this reason, the delivery of the ServiceOrderCompletionNotification is more time critical under POC then what it is currently. AGL proposes a statement is introduced in the procedures that states: "Participant must send a ServiceOrderCompletion notification no later than by the end of the business day after the field work has been completed or attempted to be completed."	Change	The IEC acknowledges the respondent's comments, however no change made to the Procedure as there's not enough data or experience and suggests this be reviewed if need be after 1 December 2017.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
154	Powershop	2.3 Notified Party	When reviewing section 2.3 of the B2B Procedures in parallel with the amended National Energy Retail Rules (NERR), the B2B Procedures appear to go beyond the requirements detailed in part 5, clause 104 of the amended NERR. Powershop believe that the B2B Procedure, as it is currently written, requires the Initiator to manage market notifications at the time of sending the *ServiceOrderRequest* and upon receipt of the *BusinessReceipt*, *Business Acceptance/ Rejection* and *ServiceOrderResponse* across all jurisdictions. It is inappropriate, and most likely beyond the power of the working group or the IEC, to impose additional obligations on participants that are not required by the NERR or NER. We understand that enabling such notifications may be a desirable outcome for some participants and would support the inclusion of notification as an optional procedure.	Change	Refer to the response provided for Item 15.
155	Red Energy & Lumo Energy	2.3 Notified Parties	Red and Lumo support a change to make the use of Notified Parties a 'may' as opposed to a must obligation.	Change	Refer to the response provided for Item 15.
156	Simply Energy	2.3	Notified Party: Proposed changed wording (b) Notifications in the form of a NotifiedParty transaction, are for information purposes only; no action is required of the Notified Party apart from acknowledging. ~~A Notified Party may choose to use the notification as a trigger for other internal business processes, or simply ignore the notification.~~ It's not necessary to mention the second line in the above clause unless we add it as a guidance note.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

<table>
<tr>
<td>157</td>
<td>UED</td>
<td>2.3</td>
<td>
Notified Party – (e) – UE believes this description could be confusing for Initiators – it explains when the Initiator must notify the other Parties, but doesn't mention that the Hub can also do this on the Initiators behalf.

This section could usefully include a table showing how the two different implementation options, Hub/Direct, would occur. An example table is provided below
<table>
<tr><th>Point in the Service Order Process where communication with Notified Party is required</th><th>If Hub is to manage Notifications</th><th>If Initiator is to manage Notifications</th></tr>
<tr><td>At the point of SO Creation</td><td>Initiator must include Notified Parties into Service Order

Hub sends Notified Party Transaction (NPT) to each notified party (with status as SO Requested)</td><td>Initiator must NOT include Notified Parties into Service Order

Initiator must separately send NPT to each Notified party (with status as SO Requested).</td></tr>
<tr><td>If the Recipient Reject the SO</td><td>If Recipient rejects the initial service order – the Hub will sent NPT with Status 'SO Rejected' to each Notified Party</td><td>If Recipient rejects the initial service order – the Initiator must send NPT with Status 'SO Rejected' to each Notified Party</td></tr>
<tr><td>When the Recipient send a SO Completion message</td><td>When Recipient completes the initial service order – the Hub will sent NPT with Status 'SO completion' to each Notified Party</td><td>If Recipient completes the initial service order – the Initiator must send NPT with Status 'SO completion' to each Notified Party</td></tr>
<tr><td>If any Notified Party Rejects the NPT</td><td>If a Notified Party Rejects an NPT. The Hub will send an NPT to Initiator</td><td>If a Notified Party Rejects an NPT. The Initiator will receive a Business</td></tr>
</table>
</td>
<td>Change</td>
<td>The IEC agrees the following table is a useful guide and has nominated to add this to the B2B Guide document.</td>
</tr>
</table>

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
			with status "Rejection by Notified Party" *The Initiator must investigate, determine if another Party should have been notified but was not, and send a separate NPT to the correct Notified party.* *Rejection for that NPT transaction* *The Initiator must investigate, determine if another Party should have been notified but was not and send a separate NPT to the correct Notified party.*		
158	AusNet Services	2.3	AusNet Services considers the Notified Party section does not adequately and clearly describe the concept of Notified Party transactions. In particular, section 2.3(c) doesn't explain the eHub sends notifications on the Initiator's behalf if populated using the "NotifiedPartyID". In section 2.3(e) we would expect the initiator of a ServiceOrderRequest to notify parties if the Recipient takes too long to provide a Business Receipt or an Acceptance or Rejection. We consider that section 2.3(i) does not adequately describe what the payload information is.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. Refer to the response provided for Item 157 The IEC notes the respondent's comments, no change made to the Procedure The IEC disagrees, the current B2B Procedure drafting in section 2.3 (i) is sufficient.
159	Endeavour Energy	2.3 (b)	Remove the underline (b) Notifications in the form of a NotifiedParty transaction, are for information purposes only; no action is required of the Notified Party. A Notified Party may choose to use the notification as a trigger for other internal business processes, or simply ignore the notification.	Editorial	Refer to the response provided for Item 156.
160	CitiPower Powercor	2.3 (c)	**CitiPower Powercor recommends the wording of this clause be updated to '….unless the Initiator has elected to manage notifications to Notified Parties separately by issuing a Notified Party One Way Notification.' This addition will give clarity to how the communication will occur.**	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
161	Active Stream	2.3 (e)	What about the SO cancelled status? This is a requirement so that Notified Parties can take remediating measures to any internal processes they may apply to the original notification. i.e. flagging a De-energisation notification which is cancelled and not communicated. What happens if the meter goes off comms for another reason?	Change	The notified party will receive a 'notification' as part SO response from the recipient with an exception code of "initiator cancellation". The IEC notes the respondent's comment, however no change made as the current B2B Procedure drafting is sufficient.
162	AGL	2.3 (e)	AGL seeks confirmation that an iniator cancellation of a ServiceOrderRequest is provided to notified parties AGL seeks further clarification that the cancellation by a recipient is cover by point 2.3 (e) iii.s	Clarification	Refer to the response provided for Item 161.
163	Jemena	2.3(e)	Should read: "Where the Initiator has elected to manage notifications to Notified Parties separately, the Initiator must notify Notified Party/s on: (i) Receipt of a positive BusinessReceipt for a ServiceOrderRequest from a Recipient; (ii) Receipt of a negative BusinessAcceptance/Rejection for a ServiceOrderRequest from a Recipient; (iii) Receipt of a ServiceOrderResponse from a Recipient;	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
164	Aurora Energy	2.3 (e) (i)	Receipt of a positive BusinessReceipt for a ServiceOrderRequest from a Recipient; Aurora Energy comment : This is a correct statement but not shown in Figure 1	Comment	Refer to the response provided to Item 124 and item 125.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
165	AGL	2.3 (i)	The B2B Procedures should specify outcomes not solutions. In addition some of this information has been captured in the TDS doc. It is proposed that these 2 clauses be reworded as one requirement. Suggested rewording: If an Initiator receives a rejection for a Notified Party Transaction, The Initiator must: • Identify the correct Notified Party • Send the NotifiedParty Transaction with the correct ParticipantID, along with the latest payload information related to the ServiceOrderRequest.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
166	Active Stream	2.3 (i)&(j)	B2B Procedures should contain procedure requirements and not solutions. In addition some of this information has been captured in the TDS doc. Propose that these 2 clauses be reworded as one requirement for when a Notification Transaction has been rejected. Suggested rewording: If an Initiator receives a rejection for a Notified Party Transaction, the Initiator must: • Identify the correct Notified Party • Send the NotifiedParty Transaction with the correct ParticipantID, along with the latest payload information related to the ServiceOrderRequest.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
167	AGL	2.3 (j)	See comments 2.2(i)	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
168	Active Stream	2.3 (k)	Remove reference 'Section 8' to eliminate further administrative effort when and if TDS is updated.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
169	Active Stream	2.3 (l)	Remove reference 'Section 4.3' to eliminate further administrative effort when and if, the B2B Procedure OWN Process is updated.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
170	AusNet Services	2.4	In order to clearly define the B2B Communications we recommend section 2.4(b) is re-written as Recipient cannot send accept/reject transactions to Notified Parties if the initiator is managing NPs separately.	Change	The IEC agrees, the B2B Procedure updated removing any reference to notified party.
171	Energy Australia	2.4	Acknowledging Receipt of the ServiceOrderRequest. In respect to this statement *"Where the Initiator does not receive a BusinessAcceptance/Rejection from the Recipient, the Initiator should investigate the failure of the delivery and notify the Recipient if the problem is deemed to lie with the Recipient,* ***resending*** *the original ServiceOrderRequest as appropriate."* The resend functionality has been removed, therefore this is not accuratedrafting of the transaction.	Editorial correction	IEC agrees, Procedure updated.
172	CitiPower Powercor	2.4 (b)	**CitiPower Powercor recommends the following change to this clause** **'The Recipient must send a BusinessAcceptance/Rejection to the Initiator and nominated Notified Parties acknowledging whether the ServiceOrderRequest has been validated by the Recipient and is understood and accepted by the Recipient, or rejected.'** **This function will be performed by the e-Hub.**	Change	Refer to the response provided for Item 170.
173	TasNetworks	2.4 (b)	Remove "and nominated Notified Parties"	Change	Refer to the response provided for Item 170.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
174	Jemena	2.4(b)	It is Jemenas understanding that where a notified party has been included in the ServiceOrderRequest, then the Recipient does not need to take any action to notify the Notified party as the AEMO HUB will automatically route the response to both the Initiator and the Notified Party. Where the Initiator has elected to notify the Notified Party separately then the Recipient has no means to include the Notified Party. Therefore the text should read: "The Recipient must send a BusinessAcceptance/Rejection to the Initiator ~~and nominated Notified Parties~~ acknowledging whether the ServiceOrderRequest has been validated by the Recipient and is understood and accepted by the Recipient, or rejected. Any Notified Party will be provided with copy of the response via the processes based in the AEMO HUB. Where the Initiator has chosen to provide the information directly to a Notified Party(s), the Initiator must forward a copy of Recipients BusinessAcceptance/Rejection to the Notified Party(s) "	Change	Refer to the response provided for Item 170.
175	Endeavour Energy	2.4 (d)	The reference should be section 4.3 (d) Reasons for a rejection or validation errors must be advised to the Initiator using the *EventCodes* detailed in section 0.1) *BusinessAcceptance/Rejection.*	Editorial correction	IEC agrees, Procedure corrected.
176	ActewAGL	2.4 (d)	Remove reference "section 0.1", add "Table 14"	Editorial correction	IEC agrees, Procedure corrected.
177	Aurora Energy	2.4 (d)	EventCodes detailed in section 0.1) Aurora Energy comment : Should read 4.3.1 and remove)	Editorial correction	IEC agrees, Procedure corrected.
178	Active Stream	2.4 (d)	Incorrect section referenced 'Section 0.1' Section 4.3.1. lists the Event Codes.	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
179	TasNetworks	2.4 (d)	Replace “section 0.1” with “section 4.3”	Editorial correction	IEC agrees, Procedure corrected.
180	Jemena	2.4(f)	Should read: Where the Initiator does not receive a BusinessAcceptance/Rejection from the Recipient, the Initiator should liaise with the Recipient to investigate and identify the reason for the failure of the delivery and resend the original ServiceOrderRequest as appropriate	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
181	Endeavour Energy	2.5 (c)	Should be flagged as [Guidance Note 1] (c) The Recipient must use reasonable endeavours to consult with the Customer to make arrangements for the completion of the work requested where the Initiator has provided a value of “Yes” in *CustomerConsultationRequired*.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
182	Endeavour Energy	2.5 (d)	Should be flagged as [Guidance Note 1] (d) In discussions between the Recipient and the Customer, the nature of the work requested must not be changed without obtaining the consent of the Initiator. Where the nature of the work changes, the Recipient must advise the Initiator and reach agreement regarding the resolution of the change in the scope of work (for example, the Initiator may need to cancel the original ServiceOrderRequest and issue a new one).	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
183	TasNetworks	2.6 (a)(ii)(C) and (D)	Replace “2.4” with “2.6”	Editorial correction	IEC agrees, Procedure corrected.
184	ActewAGL	2.6 (b)	Italicise “ScheduledDate”	Editorial correction	IEC agrees, Procedure corrected.
185	TasNetworks	2.6 (c)	Replace “2.4” with “2.6”	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
186	Endeavour Energy	2.6 (c)(C)	The highlighted text should be flagged with [Guidance Note 1] (C) Where a Customer advises the Initiator they have already moved into the Site and the Site is energised (left energised or energised by the Customer), if the Initiator requires a move-in reading the Initiator may raise a Re-energisation with a *CustomerPreferredDateAndTime* that matches the move-in date, and a prospective *ScheduledDate*. The Recipient will provide a meter reading in accordance with the Metrology Procedure, undertaking field work if necessary.	Change	The IEC agrees, the B2B Procedure updated with this statement to a Guidance Note. New Guidance Note 11 Metrology Procedure Part A and Part B added to B2B Procedures.
187	VECTORAMS	2.6 (c), (i), (C)	VectorAMS suggest re-instatement of text surrounding the use of B2B Service order Subtype 'Retrospective move-in' which was present Version 2.2 of the B2B Service Order Procedures. Without this context is lost in this clause.	Change	IEC agrees, Procedure corrected by reinstating previous wording.
188	Jemena	2.6(d)	This should not be a [GN] and should read: The ScheduledDate must not be more than 100 calendar days in the future. Where a ScheduledDate is greater that 100 days in the future the Recipient must provide the Initiator with a BusinessAcceptance/Rejection with a rejection message of 'Invalid data'. Details provided in the Explanation	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
189	ActewAGL	2.7 (b)	Remove this dot point as adds no value	Change	IEC agrees, Procedure updated.
190	ActewAGL	2.7 (d)	Move this dot point up as new dot point (b)	Change	IEC agrees, Procedure updated.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
191	Endeavour Energy	2.7 (e)	The highlighted text should be flagged with [Guidance Note 1] (e) Where the Recipient is unable to complete the requested work within the Required Timeframe (from the *ScheduledDate*), the Recipient must contact[1] the Initiator as soon as reasonably practicable to negotiate a new date. This situation may arise: (i) When the Recipient first receives the ServiceOrderRequest and has an issue with the *ScheduledDate* requested by the Initiator; or (ii) If unforeseen circumstances arise during the scheduling or completion of the work which may impact on completion of the work within the Required Timeframe of the *ScheduledDate*.	Change	The IEC agrees, the B2B Procedure updated 'must' to 'should'.
192	Aurora Energy	2.7 (e)	Foot Note 1 The Retailer may choose to use email to confirm telephone arrangements Aurora Energy comment : Remove Retailer and add initiator	Editorial correction	IEC agrees, Procedure updated.
193	Endeavour Energy	2.7 (f)	The highlighted text should be flagged with [Guidance Note 1] (f) If the Recipient becomes aware of an inability to meet the Required Timeframe then, prior to sending a *BusinessAcceptance/Rejection*, the Recipient must telephone the Initiator to negotiate an acceptable date and confirm any arrangements via the *BusinessAcceptance/Rejection*.	Change	IEC agrees, Procedure updated.
194	Endeavour Energy	2.7 (g)	The highlighted text should be flagged with [Guidance Note 1] (g) If the Recipient becomes aware of an inability to meet the Required Timeframe after sending a *BusinessAcceptance/Rejection*: (i) The Recipient must telephone the Initiator to negotiate an acceptable date and confirm any arrangements via email; and	Change	IEC agrees, Procedure updated.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
195	Endeavour Energy	2.7 (h)	The highlighted text should be flagged with [Guidance Note 1] (h) Where a *CustomerPreferredDateAndTime* has been agreed (with an *AppointmentReference*) and the Appointment cannot be met, the Recipient must telephone the Initiator to negotiate an acceptable alternative date (ie a new *CustomerPreferredDateAndTime*). In this instance, if the Initiator does not cancel and re-issue the ServiceOrderRequest, the Initiator must confirm any revised Appointment details with the Recipient by email.	Change	IEC agrees, Procedure updated.
196	Momentum Energy	2.9 (c) "Cost TBA"	Can "No Charge be used in the case of Re-energisation, De-energisation and Special Read ServiceOrderRequests, and later be charged retrospectively. This scenario can be used to overcome the restriction of using "Cost TBA" for Re-energisation, De-energisation and Special Read ServiceOrderRequests	Question/ Change	Possible B2B Guide addition No change
197	Jemena	2.9(c)	Should read as follows: (c) Specific requirements apply to the use of the "Cost TBA" code as follows: (i) The ProductCode "Cost TBA" must not be used for Re-energisation, De-energisation and Special Read ServiceOrderRequests; and (ii) The ProductCode "Cost TBA" must only be used when the Service Order Recipient needs to do further investigation to determine what work was attempted or completed at the Site. This ProductCode must not be used as a default. (iii) The ProductCode "Cost TBA" must not be used where the Recipient has AER regulated and published tafiffs for the specified services.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. Product codes will not just be used by regulated businesses.
198	Aurora Energy	2.11 (c)	If the Initiator needs to cancel a Service Order urgently, this must be communicated to the Recipient soon as practicable Aurora Energy comment: Should this not still state phone as it indicates by any method and this could be missed if emailed.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
199	ActewAGL	2.12	Reword To change a ServiceOrderRequest, the Initiator must cancel~~s~~ the original Request and issue a new one.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
200	Red Energy & Lumo Energy	2.12 Updating a ServiceOrderRequest	Correction of sentence: To change a ServiceOrderRequest the Initiator cancels the original Request and issues a new one	Editorial correction	IEC agrees, Procedure corrected.
201	AGL	2.13 (c)	This clause is inconsistent with the amendments in clause 2.13(d) which allows for paperwork to be provided at site by another party. Suggest that clause (c) may be redundant in light of clause (d) drafting.	Change	The IEC agrees, the B2B Procedure updated with revised drafting.
202	Active Stream	2.13 (c)(i)	It is possible that third parties do not provide the service paperwork to the Initiator but allow for it to be provided on site. This clause needs to be reworded to reflect such scenarios.	Change	Refer to the response provided for Item 201.
203	AGL	2.13 (d)	Suggest re-writing this clause to be clear that if paperwork is being sent then the SO should have the paperwork ID on it and the paperwork should have the Service ID on it. If paperwork is being provide through another method, then specify the method in the SO.	Change	Refer to the response provided for Item 201.
204	Active Stream	2.13 (d)(i)	It is possible that third parties do not provide the service paperwork to the Initiator but allow for it to be provided on site. Initiators will still raise a Service Order. The first sentence of (d) needs to be reworded to reflect such scenarios.	Change	Refer to the response provided for Item 201.
205	Pacific Hydro	2.13 (e) [old clause no 2.14 (d)]	Suggest 'and' be added to the end of this sentence in order for clauses (i) and (ii) to read appropriately. (e) Where the Service Order is 'Rejected' or 'Not Completed' for reasons other than 'Missing Paperwork', the Initiator raises a subsequent ServiceOrderRequest and:…	Editorial grammar	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
206	Endeavour Energy	2.14	Table 3 Remove the unnecessary punctuation as highlighted below Customer On-Site | There is a Customer at Site and the Site was not de-energised. | Limited to a physical De-energisation ServiceOrderRequests with the status of 'Not Completed'. Not allowed for De-energisation ServiceOrderRequests with *ServiceOrderSubType* of "Remove Fuse)" or "Pillar box, Pit or Pole top" and De-energisation Reason "Non-Payment (DNP)".	Editorial correction	IEC agrees, Procedure corrected.
207	ActewAGL	2.14	Table 3 – Customer On-Site Insert full stop after "Not allowed for De-energisation" Remove 1 full stop after "(DNP)"	Editorial correction	IEC agrees, Procedure corrected.
208	ActewAGL	2.14	Table 3 – Customer Prevented Insert full stop after "'Not Completed'"	Editorial correction	IEC agrees, Procedure corrected.
209	ActewAGL	2.14	Table 3 – Life Support Insert full stop after "de-energise" and remove comma	Editorial correction	IEC agrees, Procedure corrected.
210	ActewAGL	2.14	Table 3 – No Comms Insert full stop after "device"	Editorial correction	IEC agrees, Procedure corrected.
211	ActewAGL	2.14	Table 3 – Meter Not Retrieved Insert full stop after "DNSP" Insert full stop after "recovered"	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
212	Energex & Ergon Energy	2.14	**Explanation of use of ExceptionCodes** Table 3 ExceptionCodes Usage Rules We suggest that an additional event code should be included for the Supply Service Works - Tariff Change Service Order Sub Type. This is required in order to correctly identify where the DNSP is not able to complete the request due to the meter not being capable. We recommend an event code such as 'Metering is not capable of Tariff Change'.	Change	The IEC agrees, the B2B Procedure updated with; 'Metering not compatible with proposed Tariff Change'.
213	Red Energy & Lumo Energy	2.14 Explanation of use of Exception Codes	Table 3: Unknown Load - update spelling of customer to Customer	Editorial correction	IEC agrees, Procedure corrected.
214	Momentum Energy	2.14 Table 3	Value = "Shared Supply Point", is it possible to have this information populated in MSATS, this will prevent incorrect service order and reduce in exceptions.	Change	Changes to MSATS is not in scope for this consultation. The IEC advises that all proposed changes to MSATS be taken up with AEMO.
215	AGL	2.15	Given that this clause has called out ENMs and DNSPs, suggest that this clause start with clause (f) and then the remainder change to recipient. The current clause (f) seems to be an afterthought.	Change	IEC agrees, the current drafting needs improving, Section 2.15 (f) has been redrafted as follows; "A Retailer and an Embedded Network Manager can agree to use the Allocate NMI transaction for the purposes of B2B communications. If the Retailer and ENM agree to use these B2B procedure and must comply with all obligations in this procedure."

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
216	Active Stream	2.15.1	Given the intention and addition of clause (f) suggest the following: - Removing clause (f) - Adding a clause to clarify that the Recipient of the Allocate NMI can be a DNSP or ENM - Replace DNSP with Recipient.	Change	Refer to the response provided for Item 215.
217	ActewAGL	2.15.1 (a)	Remove This Service Order type and Insert This Service Order sub type	Editorial correction	IEC agrees, Procedure updated.
218	Jemena	2.15.1(b)	Should read: By submitting the ServiceOrderRequest, the Retailer confirms they have explicit customer consent to be the Customer's Retailer as at the time of energisation	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. Obligations of having the customer's explicit informed consent is adequately addressed in the NERR and relevant Jurisdictional codes.
219	ActewAGL	2.15.1 (d)	Insert after "allocated" the words "and added to MSATS,"	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
220	Jemena	2.15.1(f)	Should read: For the avoidance of doubt, a Retailer and an Embedded Network Manager can agree to use the Allocate NMI transaction for the purposes of B2B communications, for new connections in an embedded network that are to have a different FRMP to that of the parent NMI for the embedded network.	Change	The IEC disagrees, the same Retailer can be FRMP for both a Parent and Child NMI. No change made to the Procedures.
221	Endeavour Energy	2.15.2	New [Guidance Note 1] 2.15.2 (c) (iii) In NSW, to ensure continuity of supply and no inconvenience to the customer, for type 6 metered sites the Retailer must not instruct the customer to turn off the main switch(es) prior to raising the Re-En SO..	Change	The IEC notes the respondent's suggested change, however has elected to add the following statement to the B2B Guide document.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
223	AusNet Services	2.15.2	Please clarify what is intended by point (b). The term "an appropriate ServiceOrderResponse" is unclear. What is the method of providing a meter reading? As there are new participant roles relevant to re-energisation, please clarify the details within 2.15.2(c)(ii) to confirm that a DNSP will re-energise a meter only where the DNSP is also the Metering Coordinator.	Question	No changes have been made to the word drafting as this reflects existing practice. The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. Apart from being included as a guidance note, no change has been made to the drafting as this reflects existing practice.
224	AGL	2.15.2	Are there regulatory instruments requiring inspection for QLD and ACT?	Question	IEC suggests, participants seek their own legal and regulatory advice regarding Jurisdictional obligations.
225	Aurora Energy	2.15.2 (b)	The Recipient must return the appropriate ServiceOrderResponse and where possible provide a meter reading. Aurora Energy comment : Meter reads would only be provided by a DNSP if it was a type 6 meter	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
226	Jemena	2.15.2 (c)(i)	Should read: Where the DNSP is the default MC for a Type 6 metered sites, and there is no requirement to visit the Site to perform the Re-energisation (eg Customer removes sticker and switches the main switch on), the DNSP may use the last actual read if it is less than 6 weeks prior to the move-in date, or such other period as otherwise permitted by jurisdictional regulations. This read must be provided to the Retailer and MSATS as if an actual read occurred on the move-in date.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
227	Jemena	2.15.2 (c)(ii)	Should read: [GN 1] In order to avoid delay in Customer re-energisations, where the DNSP is the MC it should re-energise upon receiving a ServiceOrderRequest irrespective of the transfer status in MSATS. Where the DNSP is not the MC for a site it will only provide connection to the Pole or Pit supply point on receipt of a ServiceOrderRequest where and when it is safe to do so.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. The proposed additional words in highlight is also incorrect, connection to a supply point is not limited at a Pole or Pit.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
228	Jemena	2.15.2 (c)(iii)(C)	Should read: Where a Retailer populates the ServiceTime with "Non-Business Hours" it Indicates that the Retailer will accept any "Non-Business Hours" charges levied against the ServiceOrderRequest.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
229	Active Stream	2.15.2 (c) (ii)	This Guidance note is applicable to participant Recipients irrespective if they are a regulated business or not Suggest that the guidance note is moved above (c) and reworded to allow for MP SPs to also re-energise sites for prospective Retailers.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
230	Aurora Energy	2.15.2 (c) (iv)	If a Retailer raises a Re-energisation ServiceOrderRequest without a ServiceOrderSubType, Aurora Energy comment: Sub type for RE EN is now mandatory as per Table 11 – so this should be rejected	Change	Refer to the response provided for Item 238. The IEC agrees, for the avoidance of doubt the section 2.15.2 (c) (iv) has been deleted. ~~(iv) If a Retailer raises a Re-energisation ServiceOrderRequest without a ServiceOrderSubType, the DNSP must undertake the necessary fieldwork to ensure that the Site is energised and a read is provided for the date component of ActualDateAndTime (subject to 2.12.7.a5.2 (c)(i)).~~
231	Aurora Energy	2.15.2 (c) (iv)	(subject to 2.15.2.a5.2 (c)(i)). Aurora Energy comment: There is no 5.2 in this document (c)(i) also need a space in front of 5.2	Change	Refer to the response provided for Item 230 and Item 237.
232	Jemena	2.15.2 (c)(iv)	Should read: If a Retailer raises a Re-energisation ServiceOrderRequest without a ServiceOrderSubType, and the DNSP is the Metering Coordinator for the site, the DNSP must undertake the necessary fieldwork to ensure that the Site is energised and a read is provided for the date component of ActualDateAndTime (subject to 2.12.7.a5.2 (c)(i)).	Change	Refer to the response provided for Item 230 and 237.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
233	Aurora Energy	2.15.2 (c) (v)	This Service Order type has Service Paperwork requirements in some jurisdictions Aurora Energy comment : This note already indicates this is for Victoria – so no need for the statement	Change	IEC agrees, Procedure updated to provide further clarity regarding the appropriate guidance note also highlighting the provision for South Australian requirements.
234	Aurora Energy	2.15.2 (c) (v)	Aurora Energy comment: would this not be better placed with 2.15 (c) (vii) as they are both guidance notes?	Change	Refer to the response provided for Item 234 and Item 246.
235	Aurora Energy	2.15.2 (c) (v) & (vii)	Aurora Energy comment: unsure why these are Guidance note 1 which states "This is an accepted or common industry practice that does not reference a specific legal or jurisdictional requirement." However these are jurisdictional requirement so does not make sense?	Change	IEC agrees, Procedure updated. Also refer to the response provided for Item 246.
236	Endeavour Energy	2.15.2 (c)(B)	The highlighted text should be flagged with [Guidance Note 1] (B) The DNSP must take into account the value in the *ServiceTime* field when scheduling the ServiceOrderRequest.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
237	Endeavour Energy	2.15.2 (c)(iv)	This clause can be removed as SO sub type is a mandatory field (iv) If a Retailer raises a Re-energisation ServiceOrderRequest without a *ServiceOrderSubType*, the DNSP must undertake the necessary fieldwork to ensure that the Site is energised and a read is provided for the date component of *ActualDateAndTime* (subject to 2.15.25.2 (c)(i)).	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
238	ActewAGL	2.15.2 (c)(iv)	Remove clause as no longer applicable with sub type now a Mandatory field	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
239	Active Stream	2.15.2 (c)(v)	Guidance note not 1 as jurisdictional.	Change	IEC agrees, Procedure updated.
240	ActewAGL	2.15.2 (c)(vi)	Capitalise Type 6	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
241	Active Stream	2.15.2 (c)(vii)	Guidance note not 1 as jurisdictional.	Change	Refer to the response provided for Item 246.
242	SA Power Networks	2.15.2 (v)	Reword – add South Australia to current clause as follows - [Guidance Note 1] In Victoria and South Australia, if a service has been off supply (de-energised) for more than 12 months, the SIRs (Service Installation Rules) require certified evidence that an installation is safe to reconnect; eg Electrical Certificate of Compliance (ECC) in SA, Certificate of Electrical Safety (CES), EWR or a letter that a safety check has been conducted by an electrical contractor. If this notification is not provided, the DNSP may reject the ServiceOrderRequest. This Service Order type has Service Paperwork requirements in some jurisdictions. See clause 2.13 for details regarding Service Paperwork processes.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
243	AGL	2.15.2 (v)	The use of Guidance Note 1 is incorrect. The requirement for an inspection is not industry practice, but the outcome of a regulatory instrument – the SIRs.	Change	IEC agrees, Procedure updated.
244	AGL	2.15.2 (v)	Check whether requirement comes from SIRs or another jurisdictional regulatory instrument.	Change	Refer to the response provided for Item 243
245	SA Power Networks	2.15.2 (vi)	Reword current clause as follows – In SA, where a Customer advises the Retailer they have already moved into the Site, the Site is energised (left energised or energised by the Customer) and the Retailer requires a move-in reading, the Retailer must raise a Re-energisation ServiceOrderRequest with a ServiceOrderSubType of ~~"Sticker Removal"~~ "New Reading Required". The DNSP will provide a meter reading in accordance with the Metrology Procedure, undertaking field work if necessary. Where this code is used, the CustomerPreferredDateAndTime must not be retrospective where the meter type is 6.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
246	TasNetworks	2.15.2 (c) (vii)	Remove this clause from B2B Service Order Process	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
247	AGL	2.15.2 (vii)	The use of Guidance Note 1 is incorrect. The requirement for an inspection is not industry practice, but the outcome of a regulatory instrument – the SIRs.	Change	Refer to the response provided for Item 246.
248	Energy Australia	2.15.3	**De-energisation** (b) Where a Retailer issues the ServiceOrderRequest to the DNSP, the following provisions apply: (i) 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. In reference to the section where the DNSP may contact Retailer, it could be construed as not being necessary. This could create inconsistency in industry processes and lead to customer experiences issues and potential revenue issues for retailers. This section should be reworded to make it clear when a phone call is needed and when the DNSP can act on retailers instructions within reason (for instance, if a De-energisaiton was not possible due to a safety hazard that cannot be rectified, the DNSP should not proceed).	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. 2.15.3 (b) (i) has been updated as a Guidance note 1.
249	Jemena	2.15.3(b)	Should read: Where a Retailer issues the ServiceOrderRequest to the DNSP, acting as the Metering Coordinator, the following provisions apply:	Change	Incorrect statement. The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
250	Energex & Ergon Energy	2.15.3 (b) (ii)	We suggest updating the following sentence as per below, as this is the only De-energisation reason that can be used and saves participants from having to scroll to the data table (changes tracked in red): For a De-energisation ServiceOrderRequest for non-payment, the Retailer must populate the *De-energisationReason* with Non-Payment (DNP).	Change	The IEC disagrees with the suggested change, instead this clause has deleted as *De-energisationReason* is a mandatory.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
251	Endeavour Energy	2.15.3 (b)(A)	Remove the additional full stop highlighted below (A) Where payment is received by the Retailer before the ServiceOrderResponse is received, the Retailer must raise a cancellation ServiceOrderRequest, where the *ScheduledDate* is in the future. If urgent, the Retailer must communicate this to the DNSP immediately (e.g. by phone).	Editorial correction	IEC agrees, Procedure corrected.
252	Endeavour Energy	2.15.3 (b)(B)	The highlighted text should be flagged with [Guidance Note 1] (B) The DNSP must not accept payment of any kind on behalf of the Current Retailer. If payment is offered or discussion/dispute eventuates the DNSP's Disconnecting Officer may contact the Current Retailer for direction whilst at the premises. The Officer, not the Customer, should make this call.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
253	Endeavour Energy	2.15.3 (b)(i)	The highlighted text should be flagged with [Guidance Note 1] (b) Where a Retailer issues the ServiceOrderRequest to the DNSP, the following provisions apply: (i) 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.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
254	Aurora Energy	2.15.3 (ii)	For a De-energisation ServiceOrderRequest for non-payment, the Retailer must populate the De-energisationReason Aurora Energy comment: All De En service orders need a reason code so not sure why stating just this one?	Change	Refer to the response provided for Item 250.
255	Pacific Hydro	2.15.4 (a)	Reference is made to the prospective Retailer and new Retailer. Suggest the use of a single term.	Editorial grammar	IEC agrees, Procedure updated.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
256	Energex & Ergon Energy	2.15.5	**Supply Abolishment** (a) [Guidance Note 1] Please remove the reference to Queensland from [Guidance Note 1] as Queensland does not have a paperwork requirement for Supply Abolishment. Our suggested amendment is below: (a) [Guidance Note 1] In South Australia, Victoria~~,~~ and Tasmania ~~and Queensland~~, the Initiator ensures that all necessary paperwork is supplied to the DNSP 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.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
257	Energy Australia	2.15.5	We note that ACT and NSW are not referenced, for completeness any specific Supply Abolishment requirements should be mentioned in this section.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. No specific Supply Abolishment Paperwork requirements identified for ACT and NSW.

258	Energy Australia	2.15.5	***Supply Abolishment***
			Please update this section to reflect these points/questions
			• The note only covers VIC, SA, QLD and TAS. It does not cover the supply abolishment process in NSW and ACT. (ACT has supply abolishment RFS paper work (as per Appendix in B2B Guide), so it would imply that it should also be included in section 2.15.5)
			• In NSW,
			  • Is the process for the customer to be directed to the DNSP?
			  • It the same for all meter types or different for type 4?
				Question	Refer to the response provided for Item 257.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
259	AGL	2.15.5	Supply Abolishment Paperwork is not always available for a supply abolishment – especially when a network has previously abolished the supply but not ended the NMI and meter data streams. Retailers need to be able to progress these abolishments to close of other activities. Suggest rewording to say that ….that all necessary paperwork, where available, is supplied ….	Change	IEC agrees, Procedure updated.
260	ENERGYAP	2.16	**Multiple Service Orders** – The procedures need to clarify the use of Notified Party Notifications with respect to Multiple Service Order Scenarios. Is the DNSP expected to use the Notified Party Notification to determine a Multiple Service Order Scenario? Notified Party Notifications cannot be use if: • All Participants do not sent them • Cancelled SO's are not sent to Notified Parties	Change	The IEC disagrees with the suggested change - NotifiedParty transactions bear no relationships with multiple service orders as it's all around how the recipient of multiple service order manages those service orders. No change made to procedures.
261	Active Stream	2.16	Multiple Service Order scenarios will exist for contestable providers and recommend the clauses are amended accordingly to reflect general instances. As a baseline if applicable to all Participants they should be called out in the B2B Procedure. Participants should not be required to rewrite B2B procs in service level agreements for baseline requirements. The B2B procedures are standard procedures open for all participants not only DBs.	Change	The IEC disagrees, the current B2B Procedure drafting is sufficient. Multiple Service Order scenarios where developed to assist participants navigate the management of multiple service orders triggered in a competitive retail market into a regulated service environment. Commercial arrangements for competitive service offerings is the more appropriate home in this context.
262	AusNet Services	2.16	2.16.(e) and (f) refers to "Section 0" which does not exist.	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
263	AGL	2.16	Commercial service providers will need to cope with multiple service orders and retailers will need to understand how they are sequenced. AGL recommends that the clauses are amended accordingly to reflect generic situations.	Change	Refer to the response provided for Item 261.
264	AGL	2.16	2.16(a) Grammar – change 'applies' to 'apply'	Editorial grammar	IEC agrees, Procedure corrected.
265	Aurora Energy	2.16 (a)	The obligations under this clause applies to regulated businesses. Aurora Energy comment: Replace with apply	Editorial correction	Refer to the response provided for Item 264.
266	AGL	2.16 (a)	Multiple Service Order scenarios will exist for contestable providers and recommend the clauses are amended accordingly to reflect general instances. As a baseline if applicable to all Participants they should be called out in the B2B Procedure. Participants should not be required to rewrite B2B procs in service level agreements for baseline requirements. The B2B procedures are standard procedures open for all participants not only DBs. Effectively AGL would like to see 2.16 (a) apply to all participants.	Change	Refer to the response provided for Item 261.
267	Endeavour Energy	2.16 (e)	Clause should reference Table 4 (e) Where there is a physical Re-energisation and De-energisation received for the same NMI, the Recipient has the discretion to undertake a single meter reading. Scenarios 1-6, detailed in section 0, allow for this practice.	Editorial correction	IEC agrees, Procedure corrected.
268	ActewAGL	2.16 (e)	Remove reference "section 0", add "Table 5"	Editorial correction	Refer to the response provided for Item 267.
269	Pacific Hydro	2.16 (e)	Scenarios 1-6, detailed in section 0, allow for this practice. Is this the correct Section?	Editorial correction	Refer to the response provided for Item 267.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
270	Aurora Energy	2.16 (e) & (f)	section 0 Aurora Energy comment: needs to state table 5 or 2.16.1.1?	Editorial correction	Refer to the response provided for Item 267.
271	Endeavour Energy	2.16 (f)	Clause should reference Table 4 (f) The scenarios, detailed in section 0, assume that the De-energisation ServiceOrderRequest has a *ConfirmedDe-energisation* value of "No".	Change	Refer to the response provided for Item 267.
272	Endeavour Energy	2.16 (f)	The highlighted text should be flagged with [Guidance Note 1] (i) Where the *ConfirmedDe-energisation* value is "Yes" in the De-energisation ServiceOrderRequest, the situation will be treated by the Recipient as an exception to the rules in this section. The Recipient must contact the Prospective Retailer (Initiator), who has raised a Re-energisation Request to assist in the resolution of the situation.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
273	ActewAGL	2.16 (f)	Remove reference "section 0", add "Table ??"	Editorial correction	IEC agrees, Procedure corrected.
274	Pacific Hydro	2.16 (f)	The scenarios, detailed in section 0, Is this the correct Section?	Editorial correction	Refer to the response provided for Item 273
275	Jemena	2.16.1(a)	Should read: The following table summarises the scenarios that apply to specific combinations of ServiceOrderRequests raised by current and prospective Retailers (Initiator). The numbers in each cell indicate which scenario applies to the specific combination (see Table 5). An "x" means the Service ProviderRecipient will reject the ServiceOrderRequest from the prospective Retailer, irrespective of whether it is received first or second.	Change	IEC agrees, Procedure clause updated to reference correct Table.
276	UED	2.16.1	**Table 4 :** Remove Metering Service Works –Install Hot water (Not an available subtype) Add – Metering Service Works – Change Timeswitch Settings	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
277	UED	2.16.1	**Table 6 :** Remove Metering Service Works –Install Hot water (Not an available subtype) Add – Metering Service Works – Change Timeswitch Settings	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
278	Endeavour Energy	2.16.1	Multiple Service Orders for Multiple Initiators This section or the B2B Guide needs to cater for multiple service providers and not just the DNSP/Initial MC. Consideration needs to be given to the scenario(s) where a contestable service provider receives a request to perform work and DNSP/Initial MC. E.g. De-En and Re-En requests for same day to different service providers. This is vital to ensure smooth and efficient operation of the market and to avoid adverse impact to the customer.	Change	The IEC notes the respondent's comments and agrees that further development of the B2B Guide will be required as more information and practical experience from Power of Choice changes is gained.
279	Aurora Energy	2.16.1	Aurora Energy comment: Does not take into account multi initiators to multi actioners – however not sure how this could be policed.	Comment	Refer to the response provided for Item 278.
280	Active Stream	2.16.1	Table 4 needs to be reviewed and then aligned with Table 5.i.e. scenario 7 states: *7 Re-energisation Supply Abolishment Receipt of Re-energisation and Supply Abolishment for same date* But that action is not applicable in some multiple service order instances of Table 4 where it has been captured.	Change	IEC agrees, Procedure table description for scenario 7 amended and 1st and 2nd Request Received column updated to Various and Various from Re-energisation and Supply Abolishment.
281	AusNet Services	2.16.1	Metering Service Works – Install Hot water is no longer an available subtype and was replaced by Install Controlled Load. Metering Service Works – Change Timeswitch Settings should be included here.	Change	IEC agrees, Procedure updated.
282	AGL	2.16.1	Table 4 Suggest review scenarios within this table for correctness. Eg meter reconfiguration against supply alteration – Scenario 7 (table 5) is for supply abolishments.	Suggestion	Refer to the response provided for Item 280.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
283	AGL	2.16.1	Table 4 Special Read – all sub-types Clause 2.2(b) limits the sub-types available to a prospective retailer, therefore this item needs amendment.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. A SO response does not vary by sub type in this case.
284	Momentum Energy	2.16.1 Table 5	Case when the same retailer or multiple retailers raises De-energisation then Re-energisation on the same date (Scenario 2), will Re-energisation take priority over De-energisation by default?	Question	Yes
285	Energy Australia	2,16 (Table 4 and Table 6)	For Meter Investigation columns and rows in the tables, "Tamper/Test/Inspect" is still referenced. We suggest removing these as meter investigation subtype has merged from 3 to 1 sub types in this drafting.	Change	IEC agrees, the Tables in section 2.16 of the Procedure to be updated where they do not align. Changes to reflect the most recent changes to retain Meter Investigation Inspect and Test as sub types.
286	Pacific Hydro	Table 4	The current Retailer will not send an Allocate NMI for a NMI for which they are FRMP. So there will be no multiple Allocate NMI service orders for current and prospective Retailers. If a prospective Retailer sends an Allocate NMI for an address where the NMI has been allocated to another Retailer, the service order should be rejected. Suggest this multiple service order/multiple Retailer situation be removed from the table.	Change	The IEC notes the respondent's comments, it is unlikely a current retailer will ever use an Allocate NMI for a NMI where they are the FRMP. However the IEC has decided not to change the table in this case as this reflect current version 2.2 drafting.
287	ActewAGL	2.16.1.1 (a)(ii)(A)	Remove the word "meter reading" as no longer applicable and the punishment make not much sense.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient. This reflects the current version 2.2 drafting.
288	ActewAGL	2.16.1.1 (b)	Reword If the Initiator who requested the De-energisation still requires the Site to be de-energised (having received a Response with an *ExceptionCode* indicating "De-energisation Not Completed Due To A Re-energisation"), there is no pending transfer in MSATS, and it was the Initiator who raised the conflicting Re-energisation, the Initiator may raise a new ServiceOrderRequest with a *ConfirmedDe-energisation* value of "Yes".	Change	The IEC disagrees with the suggested change MSATS is out of scope for B2B communications, therefore no change made.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
289	Jemena	2.16.1.3 (c)(ii)	Should read: Send a "Not Completed" ServiceOrderResponse to the Initiator for which the ServiceOrderRequest was not completed with an ExceptionCode indicating "Request Submitted By Another Retailer."	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
290	AGL	2.16.1.5	Suggest clauses (b) to (d) appear before Table 6	Editorial correction	IEC agrees, Procedure corrected.
291	Endeavour Energy	2.16.1.5 (c)	Replace 'they' with 'there' (c) This table describes whether a DSNP/Initial MC should process a New Service Order for a given NMI when they is an Existing Service order scheduled for action within 5 business days.	Editorial correction	IEC agrees, Procedure corrected.
292	Jemena	2.16.1.5 (c)	Should read: This table describes whether a DSNP/Initial MC should process a New Service Order for a given NMI when ~~they~~ there is an Existing Service order scheduled for action within 5 business days.	Editorial correction	Refer to the response provided for Item 291.
293	Pacific Hydro	Table 6	Please provide a clear explanation of the 'X' and "y" coding in the table.	Change	The IEC agrees, the B2B Procedure updated with the suggested change. An explanation of the "**x**" and " ✔ " values have been reinserted.
294	Pacific Hydro	Table 7 [old clause no Table4]	E This timing point is when the Recipient sends a ServiceOrderResponse following the attempt to complete the work requested. The work request can be completed, partially completed or not completed.	Change	No change wording sufficient
295	ActewAGL	3.2.2	Table 8 Remove all spaces *Business Acceptance /Rejection*	Editorial	IEC agrees, Procedure updated.
296	TasNetworks	3.3	Table 9 – Service Request – Re-energisation (f) Replace "4pm" with "3pm"	Change	IEC agrees, Procedure updated.

297	SA Power Networks	3.3 – Table 9	**Re-energisation** Stickers are no longer used with SA and specific references are no longer required or relevant within the Service Order Procedure. Delete the following from the "Notice Period" wording - The DNSP must receive a valid Request for a same business day Re-energisation by: a) [Guidance Note 1] 2:00pm in ACT b) Not available in NSW c) [Guidance Note 1] 1:00pm in Queensland d) [Guidance Note 1] 3:00pm in SA except for • Re-energisations following disconnection for non-payment, in which case it is 5:00pm. • ~~Sticker Removal sub-type where the notice period is 3 days~~ e) [Guidance Note 5] 3:00pm in Victoria. This only applies to Re-energisations following disconnection for non-payment f) [Guidance Note 1] 4.00pm in Tasmania For same business day, after hours Re-energisations, the recipient must receive a valid Request: a) [Guidance Note 1] by 9:00pm in ACT b) Not available in NSW c) Not available in Queensland d) [Guidance Note 1] Between 3:00pm and 9:00pm in SA (or 5:00pm and 9:00pm for a re-energisation following a disconnection for non-payment)~~, except for~~ • ~~[Guidance Note 1] 3 days for Sticker Removal sub-type~~ e) [Guidance Note 1] Between 3:00pm and 9:00pm in Victoria. This only applies to Re-energisations following disconnection for non-payment f) Not available in Tasmania	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
			For next business day Re-energisations, the DNSP must receive a valid Request on a business day: a) [Guidance Note 5] by 3:00pm in Victoria, b) [Guidance Note 1] by 3:00pm in NSW, Tasmania and ACT c) [Guidance Note 1] by 5:00pm in Queensland d) [Guidance Note 1] By 10:00pm in SA ~~except for 3 days for Sticker Removal sub-type~~		
298	SA Power Networks	3.3 – Table 9	**De-energisation** Stickers are no longer used with SA and specific references are no longer required or relevant within the Service Order Procedure. Delete the following from the "Notice Period" wording - To carry out the work in the required timeframe from the day of the receipt of the request the DNSP must receive a valid Request by: a. [Guidance Note 1] In ACT, 5:00pm b. [Guidance Note 1] In SA, if logged by 3:00pm, 2 business days~~, except Sticker Removal where the period is 3 days~~ c. [Guidance Note 1] In Victoria, if logged by 3:00pm, 2 business days d. [Guidance Note 1] In NSW and Queensland, there is no Notice Period. Work is carried out in the required timeframe irrespective of delivery time. e. [Guidance Note 1] In Tasmania, by 3pm one business day before the next scheduled day for the area. (i.e. Permissible Day)	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
299	Energy Australia	3.3 (Table 9)	Notice Period Table (De-energisation row) b. [Guidance Note 1] In SA, if logged by 3:00pm, 2 business days, except Sticker Removal where the period is 3 days Sticker Removal is not a valid scenario for a de-energisation. This should be removed as there is no equivalent sticker scenario for a de-energisation	Change	Refer to the response provided for Item 298.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
300	Aurora Energy	Table 9	RE EN a) – e) Aurora Energy comment: would this not be better set out with the earliest time to latest time?	Question	The IEC notes the respondent's question, however no change to the Procedure the current drafting is sufficient.
301	Pacific Hydro	Table 9	De-energisation b. [Guidance Note 1] In SA, if logged by 3:00pm, 2 business days, except Sticker Removal where the period is 3 days There is no Sticker Removal subtype for de-en.	Change	Refer to the response provided for Item 297.
302	Aurora Energy	3.3.1 (a)	Set out in section 6.9 of the B2B Procedure Technical Delivery Specification. Aurora Energy comment : There is no 6.9 in the Technical Delivery Specification	Change	Refer to the response provided for Item 304.
304	Active Stream	3.3.1 (a)	Suggest removing 'section 6.9 of' to mitigate the risk of incorrectly referencing sections of documents. Referencing the TDS itself allows one to find the relevant section.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
305	Aurora Energy	3.3.2 (a)	is set out in section 6.9 of the B2B Procedure Technical Delivery Specification. Aurora Energy comment : There is no 6.9 in the Technical Delivery Specification	Change	Refer to the response provided for Item 304.
306	Active Stream	3.3.2 (a)	Suggest removing 'section 6.9 of' to mitigate the risk of incorrectly referencing sections of documents. Referencing the TDS itself allows one to find the relevant section.	Change	Refer to the response provided for Item 304.
307	Endeavour Energy	3.3.3	Table 10 – De-energisation timeframes (bullet point 2) should say in NSW, the DNSP must disconnect within 2 days of the ScheduledDate	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
308	ActewAGL	3.3.3	Table 10 – Supply Service Works Remove small g	Editorial	IEC agrees, Procedure updated.
309	ActewAGL	3.3.3	Table 10 – Re-energisation Reference incorrect	Editorial	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
310	ActewAGL	3.3.3	Table 10 – Meter Service Works Remove small g	Editorial	Refer to the response provided for Item 310.
311	ActewAGL	3.3.3	Table 10 – Meter Reconfiguration and Meter Investigation These are no longer a Service Order Request, and should be moved to the Meter Service Works component and listed as separate dot points here	Change	The IEC notes the respondent's comments, Table 12 (previously Table 10) has been updated and a limited level of consolidated has been undertaken to from the previous version.
312	Energex & Ergon Energy	3.3.3	**Timing Requirement for Completion of the Requested Work** Table 10 Timing Period for completion of work For Queensland, **all** Service Requests (except Allocate NMI), need to refer to the Electricity Distribution Network Code (EDNC), as Ergon Energy has differing timeframes for the completion of the Service Requests, depending on feeder type. For Re-energisation and De-Energisation, Energex also has 'excluded locations' defined in the EDNC by which premises within these locations have 10 business days for Re-energisation / De-energisation. Further, the [Guidance Note 1] definition referred to throughout Table 10 is defined in the procedure as: *This is an accepted or common industry practice that does not reference a specific legal or jurisdictional requirement.* Whereas in Queensland, the Service Request timeframes are all jurisdictional requirements (except Allocate NMI). Further, the De-energisation Service Request refers to the Electricity Industry Code, this should be the EDNC. Document Reference: Document Name: Electricity Distribution Network Code Document Location: http://www.qca.org.au/Electricity/Reviews/Electricity-Distribution-Network-Code/Final-Report/Current-version-of-the-Electricity-Distribution-Ne	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
313	AusNet Services	3.3.3	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 in the customers' interest that each regulator reviews the service levels for metering installations and NMI allocations are appropriate.	Comment	The IEC notes the respondent's comments.
314	AGL	3.3.3	Table 10 – De-Energisation The issue of restricted / protected / permissible days needs clarification. As NSW is part of the NECF, then the NERR protected period clauses should be referenced and common terminology used. Assuming these refer to protected period de-energisations – then this should refer to the de-en reason type.	Change	The IEC notes the respondent's comments, however no change made to Table 12 (previously Table 10) No change – can be cleaned up at a later date
315	AGL	3.3.3	Table 11 – De-energisation The de-en method 'Main Switch Seal / Sticker' has been deleted. AGL believes that this will remain a valid method predominantly for DB de-energisations where no isolating fuse exists. Further, discussion of this method remains within the body of the Procedure in various sections (eg 2.15.2(f))	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
316	SA Power Networks	3.3.3 – Table 10	Allocate NMI SA Power Networks require additional time and flexibility built into the current timeframe of 2 business days. Suggested wording – - [Guidance Note 1] All jurisdictions – 5 business days (noting that the Distributor may take additional time to respond for sites that required detailed supply investigations prior to NMI allocation).	Change	IEC agrees, Procedure updated.
317	SA Power Networks	3.3.3 – Table 10	Typo - Supply Service Works 2nd bullet point spelling error – Gguidance should be Guidance	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
318	Aurora Energy	Table 10	Re-energisation (see Section 0) Aurora Energy comment : needs to state table 9 or the section	Editorial	IEC agrees, Procedure updated.
319	Aurora Energy	Table 10	Metering Service Works [Gguidance Note 1] Aurora Energy comment : remove g	Editorial	IEC agrees, Procedure updated.
320	Pacific Hydro	Table 10	Re-energisation [Guidance Note 1] Same day or after, depending on the *ScheduledDate* and the time of receipt of the Request (see Section 0) in ACT, Queensland, Victoria, Tasmania or NSW. Section 0?	Editorial	IEC agrees, Procedure updated.
321	Pacific Hydro	Table 10	Meter Reconfiguration The following timeframe applies for Meter Reconfigurations: [Guidance Note 1] 20 Business Days For Clarification add 'For all jurisdictions'	Change	IEC agrees, Procedure updated.
322	AGL	3.3.4 (a)	If an ENM is using B2B, are they required to meet the same timeframes as a DNSP for allocating NMIs?	Question	No, this is subject to a commercial arrangement.
323	Active Stream	3.3.4 (b)	Opening sentence of 3.3 (a) states: The information in this section summarises the Timing Requirements for various regulated activities provided by the DNSP only. Following this statement: Suggest replacing 'Recipient' with DNSP.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
324	Aurora Energy	3.3.5 (a)	is set out in section 6.9 of the B2B Procedure Technical Delivery Specification. Aurora Energy comment : There is no 6.9 in the Technical Delivery Specification	Change	Refer to the response provided for Item 325.
325	Active Stream	3.3.5 (a)	Suggest removing 'section 6.9 of' to mitigate the risk of incorrectly referencing sections of documents. Referencing the TDS itself allows one to find the relevant section.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
326	Aurora Energy	3.3.6 (a)	is set out in section 6.9 of the B2B Procedure Technical Delivery Specification. Aurora Energy comment : There is no 6.9 in the Technical Delivery Specification	Change	Refer to the response provided for Item 327.
327	Active Stream	3.3.6 (a)	Suggest removing 'section 6.9 of' to mitigate the risk of incorrectly referencing sections of documents. Referencing the TDS itself allows one to find the relevant section.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
328	Endeavour Energy	4	Table 11 The ServiceOrderType should be M/N for all service orders. It is not required for Cancel.	Change	IEC agrees, Procedure corrected.
329	Endeavour Energy	4	Table 11 The ServiceOrderSubType should be M/N for all service orders except for Miscellaneous.	Change	IEC agrees, Procedure corrected, except for Special Read where it remains R/N.
330	Endeavour Energy	4	Table 11 Endeavour's first round submission included the addition of a new sub type for De-En SO's of Group Metering. 158 | | Table 1 Service Order Types and Subtypes | Endeavour Energy | For De-energisation SO's need to add a sub type of Group Metering so it is clear to the recipient that they need to co-ordinate multiple parties for a de-energisation. | Change | B2BWG does not agree to the suggested change. Temporary isolation is available where Initiator becomes aware of Group Supply. It will facilitate a simpler build for participants to manage this if a new sub type of Group Metering Isolation is catered for. Either a new sub type of Group Metering Isolation or a new reason code of Group Metering to be used with the Supply Service Works, Temporary Isolation will facilitate this.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
331	Endeavour Energy	4	Table 11 The MeterSerialNumber should be mandatory for the following service orders: Tariff Change Exchange Meter Remove Meter Meter Reconfiguration Meter Investigation	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
332	Endeavour Energy	4	Table 11 The MeterSerialNumber should be R/N for an Install Controlled Load service order	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
333	Endeavour Energy	4	Table 11 ServiceOrderCo-ordiantionRequired field should be mandatory for all service orders as it is a Yes/No format	Change	IEC agrees, Procedure corrected.
334	Endeavour Energy	4	Table 11 Co-ordinatedContactName should be R/N for De-energisation SO	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
335	Endeavour Energy	4	Table 11 Co-ordinatedContactTelephoneNumber should be R/N for De-energisation SO	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
336	Endeavour Energy	4	Table 11 CustomerConsultationRequired should be mandatory for all SO's as it is a Yes/No format	Change	IEC agrees, Procedure updated.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
337	Endeavour Energy	4	Table 11 Update formatting of REC-AttendanceRequired for Allocate NMI from /RN to R/N	Change	IEC agrees, Procedure corrected.
338	Endeavour Energy	4	Table 11 InstallationType should be R/N for Allocate NMI SO	Change	IEC agrees, Procedure corrected.
339	ENERGYAP	4	Table 11 The MeterSerialNumber should be mandatory for the following service orders: Tariff Change Exchange Meter Remove Meter Meter Reconfiguration Meter Investigation	Change	Refer to the response provided for Item 331.
340	ActewAGL	4	Remove “the tables below:” Insert “Table 11.”	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
341	Essential Energy	4	Table 11 The MeterSerialNumber should be mandatory for the following service orders: Tariff Change Exchange Meter Remove Meter Meter Reconfiguration Meter Investigation	Change	Refer to the response provided for Item 331.
342	Essential Energy	4	Table 11 The MeterSerialNumber should be mandatory for the following service orders: Tariff Change Exchange Meter Remove Meter Meter Reconfiguration Meter Investigation	Change	Refer to the response provided for Item 331.
343	UED	4.1	Table 11: Service Order Sub Type: UE believes that the re- introduction of Re-Energisation Sub-types has been done in a way that is inconsistent with the Method/Reason approach taken for De-energisation. In De-energisation the Reason and method have been split. But this approach has not been carried over when the Re-En subtypes were re-introduced – this seems like a lost opportunity for a consistent approach. UE recommends that the Re-En subtypes be identical to the De-En Subtypes and a Re-en Reason be introduced.	Change	Refer to the response provided for Item 35.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
344	UED	4.1	Table 11 De-Energisation Reason: UE believes that the Re-En Sub Types should distinguish between Reason and Method as has been done for De-en. UE recommends the following: Change the field name to "Reason" Add two new reason codes to suit Re-En • Re-En after Non-Payment • Unspecified	Change	Refer to the response provided for Item 343.
345	CitiPower Powercor	4.1	Table 11 – Service Order Sub Type CitiPower Powercor is of the opinion the re-introduction of Re-energisation sub types has been done in a way that is inconsistent with the Method/Reason approach taken for De-energisation sub types. In the De-energisation Service Order the Method and 'Reason' have been split. This approach has not been adopted for Re-energisation sub types; these are a mixture of Methods and Reasons. CitiPower Powercor recommends the Re-energisation sub types be identical to the De-energisation sub types and Re-energisation 'Reasons' be introduced.	Change	Refer to the response provided for Item 343.
346	CitiPower Powercor	4.1	Table 11 - De-Energisation 'Reason' CitiPower Powercor recommends the Re-energisation sub types should distinguish between Reason and Method as has been done for the De-energisation transaction. CitiPower Powercor recommends the following: 1. Change the field 'De-Energisation Reason' label to 'Reason' 2. Add two new 'Reason' codes to suit the Re-energisation transaction: • Re-Energisation after Non-Payment • Meter Reading required on Re-energisation	Change	Refer to the response provided for Item 35.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
347	ActewAGL	4.1	Insert new sentence above key Where the Definition states Not Required for a “Cancel” ServiceOrderRequest, usage key value no longer applies.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
348	ActewAGL	4.1	Table 11 For clarity, Allowed usage key values should be M, R, N, O, no mixture e.g. M/N In the definition, already states when not required, just need an explanation sentence at top.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
349	ActewAGL	4.1	Table 11 – Special Read Should be mandatory as charges may apply differently, otherwise will get charged every time	Change	No change – submission unclear as to which field the comment refers to.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
350	ActewAGL	4.1	Table 11 Remove space as these are field names ServiceOrder SubType De-Energisation Reason Confirmed De-energisation MeterSerial Number ServiceOrder Address SafetyCertificate MethodSent MeteringSafetyCertificate MethodSent Special Instructions Co-ordinating ContactTelephoneNumber InitiatorContact Name InitiatorContact TelephoneNumber Appointment Reference Customers PreferredDateAndTime Embedded NetworkParent Name AverageDaily Load REC-Attendance Required OffPeak Requirements SwitchingService Required	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
351	ActewAGL	4.1	Table 11 – REC-Attendance Required Fix /RN to R	Editorial correction	Refer to the response provided for Item 337.
352	ActewAGL	4.1	Table 11 – ProposedTariff N Alignment different than rest of the table	Editorial correction	IEC agrees, Procedure corrected.
353	Select Solutions	4.1	ServiceOrderRequest Transaction Data Notified Party Id should be M, this will eliviate the need for an OWN for change tariff.	Change	No change. NotifiedPartyID cannot be made mandatory as it would force Initiators to use the e-Hub functionality for notifying Notified Parties. Refer to usage in section 2.3.
354	Energex & Ergon Energy	4.1	ServiceOrderRequest Transaction Data Table 11 Transaction table Field: ServiceOrderSubType The Service Order Sub Types provided in this field are not comprehensive. Please re-include the following Subtypes within the Metering Service Works Service Order Sub Types; • Meter Investigation – Inspect; • Meter Investigation – Meter Test; and • Meter Investigation – Tamper.	Change	The IEC agrees, the B2B Procedure updated with the suggested change to add Meter Investigation – Inspect and Meter Test. Tamper has not been added as a separate Sub Type as it can be accommodated by one of the above.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
355	Energex & Ergon Energy	4.1	ServiceOrderRequest Transaction Data Table 11 Transaction table The Metering Service Works - Change Timeswitch Settings Service Order Sub Type has not been included in the Transaction table. This is a new transaction that has been included in this version of the draft. Without the transaction data we have no visibility of the data contained within the transaction. As such, the table needs to be updated to include the new Service Order Sub Type. Further, we also suggest this Service Order Sub Type is called Change Timeswitch Settings / Relay, as this makes the transaction more robust.	Change	'Change Timeswitch Settings' Service Order Sub Type is already included in the Transaction Table. The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
356	Energex & Ergon Energy	4.1	ServiceOrderRequest Transaction Data Table 11 Transaction table The Header title in the table for the Service Order Sub Type Metering Service Works - Meter Reconfirmation is incorrect (typo) and should be updated to Metering Service Works - Meter Reconfiguration.	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
357	Energex & Ergon Energy	4.1	ServiceOrderRequest Transaction Data Table 11 Transaction table The following Metering Service Works Sub Types have been left off the Meter Header titles and appear to have been rolled into one singular 'Metering Service Works - Meter Investigation' Header title: • Meter Investigation – Inspect; • Meter Investigation – Meter Test; and • Meter Investigation – Tamper. Our business processes for each Meter Investigation type differs. As such we prefer the retention of the different Meter Investigation Service Order Sub Types. An example of the different processes is: We send a letter to the customer advising of a Meter Investigation – Meter Test, but we do not send a letter to the customer for a Meter Investigation – Tamper, for obvious reasons.	Change	Refer to the response provided for Item 354.
358	Energex & Ergon Energy	4.1	ServiceOrderRequest Transaction Data Table 11 Transaction table Field: LifeSupport The inclusion of this field for all Service Order Types and Sub Types is confusing and does not seem appropriate. For example, the LifeSupport field is mandatory on a Re-energisation or Special Read Service Order. An existing process is already in place to manage Life Support customers and this process would only duplicate and thus confuse that process. This field should be removed from all Service Order Types and Sub Types as the Customer and Site Details Notification process should identify any Life Support / Sensitive Load conditions.	Change	The IEC disagrees with the suggested change – MPs in the B2BWG indicated that they would like this extra information as they do not have an obligation to receive Customer Details Notifications (the existing process for Life Support) and would like this information as part of the job request.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
359	Energex & Ergon Energy	4.1	ServiceOrderRequest Transaction Data Table 11 Transaction table Fields: FormReference and FormNumber This field was updated in the latest Draft to reflect as "N" (Not Required) for the Metering Service Works Sub Types of 'Remove Meter' and 'Move Meter'. We consider these fields are beneficial for DNSPs to validate the receipt of the correct paperwork. As such, we recommend the FormReference and FormNumber fields are reverted back to being "R/N" (Required/Not Required) for these Service Order Sub Types.	Change	The IEC agrees, the B2B Procedure updated to R/N for FormReference and FormNumber for all Metering Service Works Sub Types.
360	Energex & Ergon Energy	4.1	ServiceOrderRequest Transaction Data Table 11Transaction table Field: ProposedTariff This field was updated in the latest Draft to reflect as "N" (Not Required) for the Metering Service Works Sub Type of 'Meter Reconfiguration'. We consider these fields are required for DNSPs to validate the Network Tariff after the completion of the Meter Reconfiguration. As such, could we recommend the ProposedTariff is updated to reflect as "M" (Mandatory) for this Service Order Sub Type.	Change	The IEC notes the reasoning to have the ProposedTariff as mandatory for the Sub Type Meter Reconfiguration, however given in v2.2 the field was marked as 'O/N' for Meter Reconfiguration, it was decided to change this to 'R/N' instead. It is in the interest of the Initiator to provide information where known to ensure work is carried correctly.
361	Active Stream	4.1	Table 11 Amend top row of the table from 'Metering Service Works Meter reconfirmation' to 'Metering Service Works Meter Reconfiguration'	Editorial correction	Refer to the response provided for Item 356.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
364	Active Stream	4.1	Table 11 ServiceOrderSub Type for Special Read amend to M. There are 2 sub types for Special Read and a participant would need to define what type of Special Read they are requesting. Otherwise does 'no subtype' become an option for Special Read? And if so, what value add do the existing sub types deliver if a blank subtype is acceptable?	Change Question	The IEC disagrees with the suggested change, as it is current practice today in some instances to have a Special Read Service Order without a Sub Type specified. Refer to the amendments made to Table 3 in section 2.1.
365	Active Stream	4.1	Table 11 Confirmed De-energisation : suggest additional information about been applicable for multiple SO scenarios - added for clarification	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
366	Active Stream	4.1	Table 11 Why meter serial number R/N for all metering works service. Suggest a status of M/N for the following: • Move meter • Exchange Meter • Remove Meter • Meter Reconfiguration • Meter Investigation	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
367	Active Stream	4.1	Table 11 Why meter serial number R/N for metering works service- Install Meter. Suggest a status of N for the following:	Change	The IEC agrees, the B2B Procedure updated with the suggested change for 'Metering Service Works - Install Meter' to N for MeterSerialNumber.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
368	Active Stream	4.1	Access Details: shouldn't M be R? If you have the details you provide them? What if there are no access details to be provided?	Change	The IEC disagrees with the suggested change. Usage of the field to remain the same; if no access details are provided, the Initiator is expected to use 'Customer Reports No Access Requirements' or 'Not Known to Initiator' as appropriate. Wording of definition of AccessDetails updated: For Example: Standard Values:
369	Active Stream	4.1	Table 11 CustomersPreferredDate and time : Replace O with R – if the Initiator has an agreed date and time with a customer they should be providing it in the B2B SO.	Change	The IEC disagrees with the suggested change. Field is to remain optional as it provides the flexibility to use other methods for arranging appointments.
370	Active Stream	4.1	Table 11 CustomersPreferredDate and time : for Re-energisation replace O/N/M with R/N.	Change	Refer to the response provided for Item 369.
371	VECTORA MS	4.1	Table 11 includes a MeteringSafetyCertificateID & MeteringSafetyCertificate MethodSent. While this works for a method of 'InMeterBox' when the retailer wishes to convey this to the DB ahead of any metering work performend, it is unclear how this will work for other methods i.e. FAX,EMAIL, ON-line as the B2B procedures do not allow for the MP to provide the Certificate Number back to the Retailer so they can include this in the SO request to the DB. MeteringSafetyCertificateID will never be used. Suggest this be removed.	Change	The IEC disagrees with the suggested change. The fields provides flexibility and allows an Initiator to include if the information is available, noting that the fields are defined as 'R/N' or 'O' or 'N'.
372	VECTORA MS	4.1	Table 11 – 'Proposed Tariff' is not a mandatory field for a 'Supply Service Works – Tariff Change'	Change	IEC agrees, Procedure updated to make ProposedTariff 'M/N' for 'Supply Service Works – Tariff Change'.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
373	TasNetworks	4.1	Table 11 Where fields are not required for a cancel service order request, include “N” in table (e.g. M/N)	Editorial correction	IEC agrees, Procedure corrected.
374	TasNetworks	4.1	Table 11 Notified Party ID Field where marked “M/N”, replace with “O/N”	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
375	TasNetworks	4.1	Table 11 “Co-ordinating Contact Telephone Number” values need to align with that of “Co-ordinating Contact Name”	Change	IEC agrees, Procedure corrected.
376	TasNetworks	4.1	Table 11 “Customer Consultation Required”, “Customer Contact Name”, “Customer Contact Telephone Number” should be “N” not “M/N” for “Supply Service Works Allocate NMI”	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
377	TasNetworks	4.1	Table 11 “Proposed Tariff” should be “M/N” for “Supply Service Works Tariff Change”	Change	Refer to the response provided for Item 372.
378	AusNet Services	4.1	Regarding subtypes of re-energisation and de-energisation, please refer to comments for Section 2.1 _____ AusNet Services notes table 11 in section 4.1 has NMI is optional for "Allocate NMI" when it should always be not required.	Change	The IEC disagrees with the suggested change. The current process in NSW allows this to occur.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
379	AGL	4.1	Table 11 – Special Read Are the sub-types mandatory? What sub-type does a prospective retailer use? Are the sub-types relevant and for what overall purpose? Can the sub-types be removed?	Question	Refer to the response provided for Item 88 and 364.
380	AGL	4.1	Table 11 MeterSerialNumber should be “N” (not required) for Metering Service Work / Install Meter	Change	Refer to the response provided for Item 367.
381	AGL	4.1	Table 11 CustomersPreferredDataAndTime; this field should be R/N across all service order types.	Change	Refer to the response provided for Item 369.
382	AGL	4.1	Table 11 Confirmed De-energisation : suggest additional information be included about multiple SO scenarios.	Change	Refer to the response provided for Item 365.
383	AGL	4.1	Table 11 Why is meter serial number R/N for metering works service. R means ‘required if available’. Similar comments apply to other rows ion the table.	Change	Refer to the response provided for Item 331 and 366.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
384	AGL	4.1	Table 11 – De-energisation Reason For clarity, to help identify where protected periods apply, a suffix of (P) could be applied to the de-en reasons – eg • Non Payment (DNP) (P) • Unauthorised Usage (P) • Breach of Contract (P) • Illegal Usage (P) • No Access (P) De-energisations for other reasons can be carried out at any time.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
385	AGL	4.1	Table 11 – De-energisation Reason Modify the explanation with 'Other'. 'No Security Deposit' is a breach of contract and protected periods apply. Suggest just delete the example.	Change	The IEC agrees, the B2B Procedure updated with the suggested change by deleting the example for 'Other'.
386	AGL	4.1	Table 11 CustomersPreferredDate and time: Replace O with R – if the Initiator has an agreed date and time with a customer they should be providing it in the B2B SO.	Change	Refer to the response provided for Item 369.
387	Energy Australia	4.1 (table 11)	Regarding these fields • Notified PartyID • ProposedTariff • MeteringSafetyCertificateID • MeterInstallCode Some Service Order sub types have "M/N' but no description when 'N" is applicable. Our assumption is that like other fields with an M/N in that the N (Not Required) is for cancel service order request. We would like the table description to be updated to reflect when a response is not required.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
388	Energy Australia	4.1 (table 11)	With regard to the Metering Required Transaction field, Currently the table indicates that this field is "M" for Install Meter and Exchange Meter but an "N" for Install Control Load. We believe there may be situations for an Install Control Load where metering is required, therefore this transaction should be updated to 'R', for install control load.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
389	Aurora Energy	Table 11	Metering Service Works Meter Reconfirmation Aurora Energy comment: Reconfiguration	Editorial correction	Refer to the response provided for Item 356.
390	Aurora Energy	Table 11	NotifiedPartyID Aurora Energy comment: should these not all be M/N as DNSP/MP presumably would want to know works are happening in all cases with the exception of allocate NMI.	Question/ change	Refer to the response provided for Item 374.
391	Aurora Energy	Table 11	Meter Service Works • Install Controlled Load • Move Meter • Install Meter • Remove Meter • Exchange Meter Aurora Energy comment: For consistency this should be Metering	Editorial correction	IEC agrees, Procedure corrected.
392	Aurora Energy	Table 11	FormReference,FormNumber, SafetyCertificateId, SafetyCertificateId, SafetyCertificate MethodSent etc. Aurora Energy comment: Should these be R/N? for metering works SO types	Question/ change	The IEC agrees, the B2B Procedure updated with the suggested change.
393	Aurora Energy	Table 11	Aurora Energy comment: Co-ordinating ContactTelephoneNumber - Metering Service Works Exchange Meter should be M/N	Question/ change	Refer to the response provided for Item 375.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
394	Aurora Energy	Table 11	Aurora Energy comment: Co-ordinating ContactTelephoneNumber - Metering Service Works Meter Investigation should be N only	Change	Refer to the response provided for Item 375.
395	Aurora Energy	Table 11	AccessDetails - Supply Service Works Tariff Change Aurora Energy comment : Should this not be M/N as it may require a physical change to metering	Question/ change	The IEC disagrees with the suggested change. A Supply Service Works – Tariff Change should only be a desktop activity for a DB. If a physical change to metering is required, it is expected that the Initiator would also raise the appropriate Metering Service Works Service Order.
396	Pacific Hydro	Table 11	The service order subtype for the Special Read is R/N. Assume this is because it can currently be left 'blank' to indicate a transfer read. Please refer to the previous comment on clause 2.2 (a)(ii). Suggest this be a Mandatory field.	Change	Correct, refer to the response provided for Item 364.
397	Pacific Hydro	Table 11	InitiatorContact TelephoneNumber Contact telephone number of Initiator contact. A maximum of three telephone numbers may be provided. Not Required for a "Cancel" ServiceOrderRequest. Add: Mandatory where InitiatorContactName is populated.	Editorial correction	IEC agrees, Procedure corrected.
398	Pacific hydro	Table 11	ProposedTariff The new Network Tariff required by the Initiator. Allowed values are the Network's Tariff Code as approved by the Regulator and recorded in MSATS at the Meter register ID level. The field can be repeated as necessary where multiple tariffs are required. The field can be repeated as necessary if multiple tariffs are required. The above sentence is repeated in the change marked version.	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
399	Red Energy & Lumo Energy	De-energisation Reason (Transaction)	The Definition column should be changed to allow for automation of reporting. Code Allowed Values indicating the reason for De-Energisation: Customer Requested Move Out	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
400	UED	4.2	Table 12 – ActualDateAndTime – make it clear that this is Market time (ie EST Not local time).	Change	The IEC agrees, the B2B Procedure updated to include the following clause from v2.2: Interpretation of Time a. All times (related to the conduct of the work) refer to the local time for the Site (where the work requested is to be carried out). Local time is inclusive of daylight saving time changes.
401	ActewAGL	4.2	Insert new sentence above Key Where the Definition states otherwise, usage key value no longer applies.	Change	Refer to the response provided for Item 347.
402	ActewAGL	4.2	Table 12 – NMI Change Use to M Reword definition This field is Not required for Responses to ServiceOrderType Supply Service Works with ServiceOrderSubType of Allocate NMI with a ServiceOrderStatus of “Not Completed”.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.

Item	Participant Name	New Clause No	Comments	Editorial/ Change	B2BWG Comments
403	ActewAGL	4.2	Table 12 – ServiceOrderAddress Change Use to M Reword definition This field is Not required when NMI provided in the Response.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
404	ActewAGL	4.2	Table 12 – ExceptionCode Change Use to M Reword definition and remove word note as not listed in other tables This field is Required if available where ServiceOrderStatus is “Completed”, otherwise Mandatory (refer 2.9.a).	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
405	ActewAGL	4.2	Table 12 – ServiceOrderAddress Change Use to M Reword definition This field is Optional except where an ExceptionCode value of “Other”, “Recipient Cancellation”, or “Documentation Not Provided” is provided, or a ServiceOrderStatus of “Partially Completed” or “Not Completed” is used.	Change	The IEC disagrees with the suggested change, the current B2B Procedure drafting is sufficient.
406	ActewAGL	4.2	Table 11 Remove space as these are field names ServiceOrder Address ActualDate AndTime RecipientContact Name RecipientContact TelephoneNumber	Editorial correction	IEC agrees, Procedure corrected.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
407	Energex & Ergon Energy	4.2	ServiceOrderRequest Transaction Data Table 12 Service Order Transaction Field : ExceptionCode The list provided for 'Not Completed' within this field is not comprehensive and does not include the new exception code provided for Tariff Change, i.e. "Tariff Change Not Approved".	Change	IEC agrees, Procedure updated with additional Exception Codes to align with ExceptionCode usage Table 5 in section 2.14.
408	VECTORA MS	4.2	VectorAMS notes that table 12 (SO response) contains a field for Notified Parties. Is this necessary if the e-hub is managing dispatch of messages to the NP's? If this is the case then this field can be removed from the SO response transaction.	Question	IEC agrees, Procedure corrected.
409	TasNetw orks	4.2	Table 12 "Notified Party ID" field is not required in service order response	Change	Refer to the response provided for item 408.
410	TasNetw orks	4.2	Table 12 Exception Code values in the definition column do not represent the new values as described in clause 2.14 Table 3.	Editorial correction	Refer to the response provided for item 407.
411	AusNet Services	4.2	Please confirm if there is a limit to the number of product codes that can be included in a response. It appears that the restriction to 3 entries has been removed.	Change	That is correct. It allows for multiple product codes.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
412	SA Power Networks	4.2 – Table 12	Service Order Response – "Exception Code' field SA Power Networks 2 additional codes should be added to assit with communication of Allocate NMI Requests that are not able to be completed – - No Service Point - No Infrastructure These would be used when significant work is required to provide supply work to the customer and no customer contact has been made to the Distributor by the customer.	Change	The IEC notes the comment, the B2B Procedure updated with the additional code 'Inadequate Infrastructure' only (also updated in Table 5 section 2.14).
413	Energy Australia	4.2 (Table 12)	Please clarify how a notified party can be a Mandatory field when the procedures state that participants may choose to arrange for notified party comms separately (see below reference)? B2B Guide>Section 2.3 Notified Party c) The Initiator must identify and include details of Notified Parties using the NotifiedPartyID in the ServiceOrderRequest, unless the Initiator has elected to manage notifications to Notified Parties separately. (d) If the Initiator has elected to manage notifications to Notified Parties separately, they must not populate the NotifiedPartyID in the ServiceOrderRequest.	Question	IEC agrees, refer to item 408.
414	Energy Australia	4.2 (Table 12)	Clarification required Re: NotifiedPartyID The description states "This field repeats to allow provision of details for multiple Notified Parties". Is there an industry view on what 'multiple' could equate too? I.e. is it safe to assume this can repeat for each potential role that exists in the market.	Question	Refer to item 408.

Item	Participant Name	**New Clause No**	Comments	Editorial/ Change	B2BWG Comments
415	Aurora Energy	Table 12	ExceptionCode Aurora Energy comment : Missing Life support as per Table 3	Change	Refer to the response provided for item 407.
416	Pacific Hydro	Table 12	Suggest the following: The participant ID of the Initiator of the ServiceOrderRequest to which this response is related.	Change	The IEC agrees, the B2B Procedure updated with the suggested change.
417	Pacific Hydro	Table 12	RecipientID This is the Participant ID of the Service provider (DNSP, ENM, MP, MDP, or MC). This is the party providing the Service Order response. Have included ENM as it states in 2.15.1. Allocate NMI: (f) For the avoidance of doubt, a Retailer and an Embedded Network Manager can agree to use the Allocate NMI transaction for the purposes of B2B communications. Also MP is not a recognised role in MSATS; MPB and MPC are. It is suggested the correct role be referred to in all B2B procedures. Refer to Notified Party in this Table.	Change	The IEC notes the respondent's comments, Procedure updated to state "This is the Participant ID of the Recipient."
418	Energy Australia	4.3.1 (table 14)	There are event codes with #### reference. Please confirm if the EventCode will be published in the final procedures.	Change	IEC agrees, Procedure updated.
419	Momentum Energy	B2B Guide 4.1 Table 1:	Faults detected on site (unplanned outage on site/disruption) who initiates the request and who all are the recipient / notified parties?	Question	The IEC notes the respondent's comments, and will consider addressing this scenario in the B2B Guide.