
Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
1	AGL	CDN Changes		AGL supports the CDN changes as described.	
2	Endeavour Energy		Title Page	Procedure improvement: The document should be renamed to highlight that life support is a separate notification. We suggest that the name of document be called "B2B Procedure: Customer, Life Support, and Site Details Notification Process" If accepted then clause 1.1.a should also be updated	IEC/B2BWG – disagreee. The life support information falls under customer or site details.

<p>3</p>	<p>Origin</p>	<p>Contents</p>	<p>Can we request that the sequence of the BUSINESS RULES and the TRANSACTIONS in the procedure be the same?</p> <ul style="list-style-type: none"> - Customer Details - Life Support - Site Access <p>Suggested to change to the following:</p> <p>4. BUSINESS RULES</p> <ul style="list-style-type: none"> 4.1. Common Business Rules for Notifications 4.2. Customer Details Request 4.3. Customer Details Notification 4.4. Life Support Customer Details Reconciliation 4.5. Customer Details Reconciliation Life Support (Also swap Life Support Request with Life Support Notification in document for consistency). 4.6. Life Support Reconciliation 4.7. Site Access Request 4.8. Site Access Notification <p>5. TRANSACTIONS</p> <ul style="list-style-type: none"> 5.1. CustomerDetailsRequest Data 5.2. CustomerDetailsNotification Data 5.3. SiteAccessRequest Data LifeSupportRequest Data 5.4. SiteAccessNotification Data LifeSupportNotification Data 5.5. LifeSupportNotification Data SiteAccessRequest Data 5.6. LifeSupportRequest Data SiteAccessNotification Data 5.7. BusinessAcceptance/Rejection 	<p>IEC/B2BWG – agree to swap section 4.4 and 4.5.</p>
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4	AGL	LS Request / LS Notice		<p>While most scenarios are covered by the proposed process, the issue of a LS registration by a previous retailer and the communication and outcome of that registration to a new incoming retailer could be made clearer.</p> <p>AGL propose that the LS Request contain a reason field, which could allow for an enumerated value of:</p> <ol style="list-style-type: none"> 1. Confirm Life Support 2. Confirm Life Support – Previous Retailer Registration 3. Confirm Life Support - Reconciliation <p>Value 1 – Confirm LS – to be used in exactly the same was as it is used in the CDN. The expected response is a LS Notice.</p> <ul style="list-style-type: none"> • If the DB is the registration owner, then all available details should be provided. • If the DB is not the registration owner, then the LS Notice should be provided with the relevant LifeSupportStatus code (eg ‘Registered – Medical Confirmation with Retailer’) but no customer details. • If the RB has no information, the RB can re-check with the customer and provide a LS Notice. <p>Value 2 – Confirm LS – Previous Retailer Registration – Used by a DB to new retailer – this transaction clarifies to the retailer that the previous retailer registered the Life Support with the network and the network is seeking to confirm the current status, but that there is a network registration in place.</p>	<p>IEC/B2BWG – agree with changes New values added to 5.6.</p>
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				<p>The expected outcome would be for the new retailer to check the LS status and provide an update to the network (possibly 'None'). It also advises the retailer that there is a DB Life Support Registration which may be temporary.</p> <p>Assuming the retailer determines there is no LS registration and advises the DB, the DB has to determine if they are maintaining the LS registration and becoming the LS registration owner. In which case they should then provide all relevant information to the Retailer.</p> <p>If they are de-registering the LS registration they would then provide an LS Notice of 'None' at the end of their de-registration process as required under 4.4.1(d).</p> <p>Used by a new retailer – this transaction seeks confirmation if there is a DB registration from a previous retailer and the DB is has chosen to maintain the LS registration or is still de-registering the site – ie that the DB is not the registration owner. This may be used to clarify how a registration occurred.</p> <p>If there is an LS Registration owned by another party then the LS Notice should be returned with the with the relevant LifeSupportStatus code (eg 'Registered – Medical Confirmation with Retailer') but no customer details.</p>	
Value 3 – Confirm Life Support – Reconciliation					

				<p>To be used when the DB or Current Retailer is seeking to reconcile their information with the current status of the other party.</p> <p>Where the other party is the LS Registration owner, they should provide full details, if not the registration owner, then the LS Notice should be provided with the relevant LifeSupportStatus code (eg 'Registered – Medical Confirmation with Retailer') but no customer details.</p>	
5	Endeavour Energy		1.1.b	<p>Procedure improvement: It should be highlight that life support is a separate notification. We suggest that clause 1.1.b be updated to:</p> <p>This Procedure specifies the standard process and data requirements for the communication, updates and reconciliation of Customer, Life Support, and Site details</p>	IEC/B2BWG - agree
6	Energy Queensland		2.2(a)	<p>Clause 2.2(a) should be amended to read as follows:</p> <p>“Figures 1-5 4 show the entire process for the provision of Customer details, Life Support Details, <u>Life Support Reconciliation</u> and Site access data, including:”</p>	IEC/B2BWG – agree with changes
7	Endeavour Energy		2.1.a.v	<p>Procedure improvement: For consistency, the term Life Support Notification with an underline should not have spaces between the words.</p>	IEC/B2BWG - Editorial - updated
8	Endeavour Energy		2.1.a.vi	<p>Procedure improvement: For consistency, the term Life Support Request with an underline should not have spaces between the words.</p>	IEC/B2BWG - Editorial - updated

9	Energy Queensland		2.2(a)(iii)	This clause should be amended to read as follows: “Where an Initiator sends a Life Support Request and a Recipient sends a Life Support Notification, <u>which includes the Life Support Reconciliation process.</u> ”	IEC/B2BWG – new clause (iv) added to include reconciliation processes
10	Endeavour Energy		2.2.a.iii	Procedure improvement: For consistency, the term Life Support Notification and Life Support Request with an underline should not have spaces between the words.	IEC/B2BWG - Editorial - updated
11	Energy Queensland		2.2(b)	The reference to “Figures 1-5” in clause 2.2(b) should be amended to read “Figures 1- 4 ”.	IEC/B2BWG - Editorial - updated
12	Energy Queensland		2.2 Figure 3: Overview of Customer Details Reconciliation Process	The heading for Figure 3 requires amendment to: “Overview of Customer Details Reconciliation Notification Process”. However, Energex and Ergon Energy query the need for Figure 3 as this process is covered in Figure 1 – Generic Notifications Process. (It should be noted that if this Figure is removed, references throughout the document to “Figures 1-4” will need to be amended to “Figures 1-3”.)	B2BWG – disagree. This figure is the process for reconciliation.
13	TasNetworks		Clause 2.2 Figure 3	Timing point F should be timing point K	IEC/B2BWG - Editorial - updated
14	TasNetworks		Clause 2.2 Figure 3	Timing point G should be timing point L	IEC/B2BWG - Editorial - updated
15	United Energy		3.1 Table 3 (h)	When the Initiator issues a Customer Details Reconciliation or Life Support Reconciliation to a Recipient. Should be updated to When the Initiator issues a Life Support Reconciliation to a Recipient in line with recent market changes to make reconciliation life support only.	IEC/B2BWG – the CDN reconciliation process still exists for participants who wish to do a full customer reconciliation

16	Endeavour Energy		Figure 4	Procedure improvement: The first note in the diagram should reference the field called Reason. We suggest updating the note to: <u>LifeSupportNotification</u> with Reason = Reconciliation	IEC/B2BWG - agree
17	Energy Queensland		3.1(a)	The reference to “Figures 1-5” in this clause should be amended to read “Figures 1- <u>4</u> ”.	IEC/B2BWG - Editorial - updated
18	Momentum	3.1(b)	3.1(f)	(f) For additional Timing Requirements for the Life Support Reconciliation process, refer to Section 4.6	IEC/B2BWG – move to the end of the section
19	Momentum	3.1©	3.1(b)	The Timing Requirements for the <u>BusinessReceipt</u> and the <u>BusinessAcceptance/Rejection</u> for the <u>SiteAccessNotification</u> are identical to those for the <u>CustomerDetailsNotification</u> .	IEC/B2BWG - agree
20	Momentum	3.1(d)	3.1©	The Timing Requirements for the <u>BusinessReceipt</u> and the <u>BusinessAcceptance/Rejection</u> for the <u>SiteAccessRequest</u> are identical to those for the <u>CustomerDetailsRequest</u> .	IEC/B2BWG - agree
21	Momentum	-	3.1(d)	The Timing Requirements for the BusinessReceipt and the BusinessAcceptance/Rejection for Life SupportNotification are identical to those for CustomerDetailsNotification	IEC/B2BWG – agree, edited clause
22	Momentum	-	3.1(e)	(e) The Timing Requirements for the BusinessReceipt and the BusinessAcceptance/Rejection for Life SupportRequest are identical to those for CustomerDetailsRequest	IEC/B2BWG – agree, edited clause
23	Momentum	3.2(a)	3.2(a)	Under the header ‘Other Timing Requirements’ 3.2(a)[Guidance Note 1]Timing requirements for the CustomerDetailsNotification,LifeSupportNotification and SiteAccessNotification can be agreed between the initiator and the Recipient.	IEC/B2BWG - agree

24	Momentum	3.2(a)	3.2(a)	[Guidance Note 1] Timing requirements for the CustomerDetailsNotification, LifeSupportNotification and SiteAccessNotification can be agreed between Initiator and Recipient	IEC/B2BWG – agree
25	Endeavour Energy		4.1.a	Procedure improvement: For consistency, the term Life Support Notification with an underline should not have spaces between the words.	IEC/B2BWG - Editorial - updated
26	TasNetworks		Clause 4.1(a)	The word “Changes” on the second line should have a lowercase “c”	IEC/B2BWG - Editorial - updated
27	TasNetworks		Clause 4.1(b)	Insert the word “the” between “not” and “CustomerDetailsNotification”	IEC/B2BWG - Editorial - updated
28	AGL	4.1(c)		We do not believe that the retailer (or DB) as a registering party would require Explicit Informed Consent to send advice of a Life Support Registration / de-Registration, particularly in the case of one without a medical certificate, as the obligation is mandated in the NRR.	IEC/B2BWG – agree, clause updated

<p>29</p>	<p>Simply Energy</p>	<p>N/A</p>	<p>4.4.1 (c)</p>	<p>Current wording: Following a change of Retailer, where the DNSP is the registration process owner, the DNSP must send the Current Retailer the information contained in a LifeSupportNotification.</p> <p>Simply Energy’s proposal: Following a change of Retailer, wWhere the DNSP is the registration process owner, the DNSP must send the prospective Retailer the information contained in (a).a LifeSupportNotification.</p> <p>If a DNSP receives LSN transaction from a Prospective Retailer, it should respond back with a LSN if it’s the registration owner, instantly. This will provide better customer experience as there wouldn’t be any need to follow up on the required paperwork from the customer earlier in the process.</p>	<p>IEC/B2BWG – disagree with markup refer to NERR 124.b.2.b Added a registration process owner field, yes/no to 5.5</p>
<p>30</p>	<p>Simply Energy</p>	<p>N/A</p>	<p>Process Map (new)</p>	<p>As a follow on from above, we suggest updating the process flow to ensure that the flow of information is warranted from the registration owner to the other participant (happy to provide one if I can get the visio of generic flow).</p>	<p>IEC/B2BWG – disagree as no other trigger points are flagged in the diagrams and this is just another trigger.</p>
<p>31</p>	<p>TasNetworks</p>		<p>Clause 4.1(d)</p>	<p>Insert the word “fields” after “non-Mandatory”</p>	<p>IEC/B2BWG - Editorial - updated</p>

32	Energy Queensland		4.1(d)	<p>Clause 4.1.(d) should be amended to read:</p> <p>“The Initiator must provide all available information that they hold for each Notification transaction, not just information changes. Non-completion of non-Mandatory fields, is taken to mean that the Initiator does not have the absent information.”</p>	IEC/B2BWG – disagree, this adds clarity to what needs to be sent in the transactions.
33	AGL	4.1(d)		<p>In the case of a DB, who is not the LS registration owner, there is a question of privacy around what information that DB should be passing on to the new retailer.</p> <p>When the DB is the LS registration owner, then they are obliged to pass on all information.</p> <p>Recommend that this clause be extended to specify that when the DB is not the registration owner the response is a LS Notice with the relevant LifeSupportStatus code (eg ‘Registered – Medical Confirmation with Retailer’) but no customer details.</p>	IEC/B2BWG – agree. clause updated
34	Endeavour Energy		4.1.d	<p>Procedure improvement: The procedure should acknowledge that another reason for not providing information for non-mandatory fields may be due to privacy reasons. We suggest updating clause 4.1.d to:</p> <p>The Initiator must provide all available information that they hold for each Notification transaction, not just information changes. Non-completion of non-mandatory fields is taken to mean that the Initiator does not have the absent information or cannot provide it due to privacy reasons.</p>	IEC/B2BWG - Refer 33

35	Jemena		4.1.d	<p><i>The Initiator must provide all available information that they hold for each Notification transaction, not just information changes. Non-completion of non-Mandatory, is taken to mean that the Initiator does not have the absent information.</i></p> <p>Jemena considers “all available information” is too broad. Please clarify whether “all relevant information” is the information referred to in the LifeSupportNotification (LSN).</p>	IEC/B2BWG – the clause provides enough clarity. You must provide all mandatory information and if you do not have or can’t provide non mandatory fields then you do not provide it.
36	AGL	4.1(h)		<p>Suggest edit for clarity:</p> <p>The <u>Current</u> Retailer may send a <u>new or amended</u> CustomerDetailsNotification in response to receiving the LifeSupportNotification from the DNSP.</p>	IEC/B2BWG - agree
37	Jemena		4.1.h	<p><i>The Initiator must only send updates where the Customer or Initiator initiated the Changes. The Initiator must not send updates based on information received from MSATS or other Participants. This prevents the cyclical transmission of information. The Retailer may send a CustomerDetailsNotification in response to receiving the LifeSupportNotification from the DNSP.</i></p> <p>Clarify the purpose of the CDN transaction that a retailer may send upon receiving a LSN from the DNSP.</p>	IEC/B2BWG – no changes have been made to CDN business rules so when a Retailer receives a LSN they may update their records. This may trigger an updated CDN.
38	EnergyAustralia	4.1(b)	Modification	<p>For the purposes of registration and deregistration or updating of life support details between Retailers and DNSPs, Retailers and DNSPs must use the LifeSupportNotification and not CustomerDetailsNotification.</p>	IEC/B2BWG – agree with changes.

39	Momentum	4.1(j)	4.1(f)	More relevant to be detailed after the clause that makes reference to BusinessAcceptance/Rejection	IEC/B2BWG - agree but moved (e) above (j)
40	Momentum	4.1(i)	4.1(j)	The details provided in a CustomerDetailsNotification and SiteAccessNotification must be the current details as at the date and time that the Notification was generated. The LastModifiedDateTime may be historical in certain situations. For the Life Support business rules, refer to Sections 4.3 and 4.4.	IEC/B2BWG - (i) became (h)

<p>41</p>	<p>EnergyAustralia</p>	<p>4.1(h)</p>	<p>Clarification</p>	<p>Clarify situations where retailer should be providing an LSR</p> <ul style="list-style-type: none"> - A situation might arise where the distributor is the process owner, and sends an LSN flagging life support to the retailer but retailer’s record shows no life support (or vice versa) - Retailer then contacts the customer who provides an update to the information, which does not match what the distributor has provided <p>Should the retailer send an LSR; or an LSN with the most updated information (provided by the customer)? It should also be clarified whether the retailer is required to send a <i>BusinessRejection</i> of the LSN to the distributor (or how the retailer communicates that the information is incorrect)</p> <p>Our preference is for the latter (for the retailer to send LSN) as this is based on the latest information provided by the customer, however it needs to be clarified if the process owner changes to the retailer.</p> <p>Our preference is for the process owner to change to the retailer in this instance as the retailer has the customer contact details (in case they move out, change LS person, mailing address, etc.)</p>	<p>IEC/B2BWG - LSN with updated information to DB. Registration owner does not change.</p>
<p>42</p>	<p>Red and Lumo Energy</p>	<p>4.2(d)</p>		<p><u>Suggested improvement to more accurately reflect retailer obligations in the market</u></p> <p><i>(d) The Current Retailer must provide a CustomerDetailsNotification in response to a valid CustomerDetailsRequest to the Distributor, and to the Initiator where agreed.</i></p>	<p>IEC/B2BWG – agree, clause updated with changes</p>

43	Origin	4.3.1		<p><u>Clarification Required:</u></p> <p>As the Life Support Notification is now the transaction used to update Life Support at a site could the below be clarified?</p> <p>a. If you look at the main changes to the CDN process it is the removal of the 'Life Support' section, and the addition of 4.3.1 (e), but there is still the requirement to populate the <i>SensitiveLoad</i> field with LS</p> <p>i. If CDN is sent with LS and no LSN has been received by DNSP, then will the CDN be rejected?</p> <p>Conversely, if a site is registered with LS and a CDN is sent with <i>SensitiveLoad</i> as 'none' and no LSN has been received by DNSP, then will the CDN be rejected?</p>	<p>IEC/B2BWG – believe that each DB will have their own validation processes.</p> <p>IEC/B2BWG suggest participants talk to each other if they believe the transactions are being rejected inappropriately.</p>
44	Energy Queensland		4.3.1(b)	<p>Further to Guidance Note 2 or clause 4.3.1(b), it is recommend that another clause should be added as follows:</p> <p>“The contact details provided by the Current Retailer to the DNSP must be specific to the onsite customer. For example, a contact telephone number, postal address or email that will ensure the onsite customer receives outage information rather than a head office located in another state.”</p>	<p>IEC/B2BWG – the procedures are not the place to mandate who the contact should be for outage purposes. The onus is on the Retailer and the customer to provide correct information to the DNSP.</p>
45	TasNetworks		Clause 4.3.1 (c)	<p>Suggest changing the words “Customer Changes” to “changes in Customer information”</p>	<p>IEC/B2BWG - agree</p>
46	TasNetworks		Clause 4.3.1 (d)	<p>Suggest changing the words “a Customer Change” to “changes in Customer information”</p>	<p>IEC/B2BWG - agree</p>

47	EnergyAustralia	4.3.2(a)	Add to clause	<p>4.3.2. Sensitive Load Field</p> <p>(a) Where life support is required at the premise the SensitiveLoad field must have a value of 'Life Support'. For the registration, update and deregistration of Life Support refer to Life Support section 4.4. The DNSP must not reject the CDN on the basis of the SensitiveLoad field being populated with "LifeSupport" if life support is needed at the premises.</p>	IEC/B2BWG - Refer 43
48	Momentum	4.4.1(e)	4.4.1(e)	<p>(e) [Guidance Note 1] Where the prospective Retailer has provided a <u>LifeSupportNotification</u> to the DNSP and life support registration is no longer required:</p> <p>(i) The prospective Retailer must send the DNSP an updated <u>LifeSupportNotification</u> and</p> <p>(ii) The DNSP may update their records accordingly.</p>	IEC/B2BWG - agree
49	EnergyAustralia	4.4.2	General comment	<p>As above in comments on 4.1(h), it needs to be clarified when a retailer should be sending an LSR (or an updated LSN) and what is expected in return in B2B Guide, especially in instances where there is new information about the life support status received from the customer obtained by the retailer as a result of the receipt of an LSN/LSR from the distributor.</p>	IEC/B2BWG - Refer 41

<p>50</p>	<p>Endeavour Energy</p>		<p>4.3.1.e</p>	<p>Procedure improvement: This clause defines how a Customer Details Notification is to be updated when Life Support is no longer appropriate. This is confusing and contradictory to clause 4.1.b which states that the Life Support Notification, not the Customer Details Notification, is to be used for communicating life support details. We suggest that clause 4.3.1.e be deleted (preferred) or make it clear that an update of the Life Support Notification is also required in the scenario highlighted in this clause.</p>	<p>IEC/B2BWG – the CDN process has not been changed due to the CDN being used by parties other than just DNSP’s and Retailers and those other parties may use the sensitive load flag.</p> <p>Additional wording has been added to clause. This does not negate the requirement to send an updated LifeSupportNotification.</p>
<p>51</p>	<p>Energy Queensland</p>		<p>4.3.1(e)</p>	<p>Clause 4.3.1(e) should be amended to read:</p> <p>“[Guidance Note 2] Where the requirements for Life Support are no longer appropriate (for example an occupier no longer meets the jurisdictional requirements to be classified as a Life Support customer) a Retailer must send a CustomerDetailsNotification Life Support Notification, containing NMI, LastModifiedDateTime, a MovementType value of “Update” and SensitiveLoad value updated as per clause 4.3.2.</p>	<p>IEC/B2BWG - Refer 50</p>

<p>52</p>	<p>Jemena</p>		<p>4..3.1.e</p>	<p><i>[Guidance Note 2] Where the requirements for Life Support are no longer appropriate (for example an occupier no longer meets the jurisdictional requirements to be classified as a Life Support customer) a Retailer must send a CustomerDetailsNotification containing NMI, LastModifiedDateTime, a MovementType value of “Update” and SensitiveLoad value updated as per clause 4.3.2.of “None” to the relevant DNSP and the DNSP must update their records accordingly.</i></p> <p>The relevant notification where the requirments for Life support in no longer appropriate is the LSN. We suggest adding a requirement that the retailer must send the LSN transaction before initiating the CDN.</p>	<p>IEC/B2BWG - Refer 50</p>
<p>53</p>	<p>AusNet Services</p>		<p>4.3.1(e)</p>	<p>Guidance Note 2 requirements for the DNSP to update records on receipt of SensitiveLoad value of “None” does not for the minimum 15 business days de-registration process, or consider the situation where the DNSP is the registered process owner of life support. We recommend the following changes to 4.3.1(e).</p> <p><i>[Guidance Note 2] Where the requirements for Life Support are no longer appropriate (for example an occupier no longer meets the jurisdictional requirements to be classified as a Life Support customer) a Retailer must:</i></p> <ul style="list-style-type: none"> - notify the DNSP by way of sending a life support notification. 	<p>IEC/B2BWG - Refer 50</p>

54	United Energy	4.3.1. (e)		<p>UE does not agree that this clause should be removed.</p> <p>Receiving the call from the Retailer prompts for our records to be updated real time. If we change to email, this can cause for a delay and allow a window where transactions being accepted shouldn't be (e.g. De-energisation) and a potential gap in customer contact during unannounced outages.</p>	<p>IEC/B2BWG – disagree.</p> <p>A bilateral agreement can be sought.</p>
55	Tango Energy		4.3.2 5.2	<p>Tango questions the use of the Sensitive Load field in CSD for Life Support as this could result in discrepancies between transactions. The Life Support value should be removed from the CSD transaction to avoid confusion and discrepancy.</p>	IEC/B2BWG - Refer 43
56	Energy Queensland		4.3.2(a)	<p>Clause 4.3.2(a) should be amended to read:</p> <p>“Where life support is required at the premise <u>a Life Support Notification must be provided as per section 4.1 (b).</u> the SensitiveLoad field must have a value of ‘Life Support’. For the registration, update and deregistration of Life Support refer to Life Support section 4.4.”</p>	IEC/B2BWG - Refer 43
57	Energy Queensland		4.3.2(c)	<p>This clause should be amended to read:</p> <p>“If neither of the above conditions does not apply then the SensitiveLoad field should have a value of ‘None’.”</p>	IEC/B2BWG – disagree. Wording is fine
58	United Energy		4.4.1	<p>Timings missing from new transaction types Table 3 is only Definitions, no mention of days. There is only timing under section 4.4.2 Life Support Request.</p>	IEC/B2BWG – agree Life Support Notification timings added.

<p>59</p>	<p>AusNet Services</p>	<p>4.4.1(c)</p>	<p>4.4.1</p>	<p>Life Support Notification</p> <p>Where a life support registration has a <i>date required</i> that is after the current date, is there an expectation that an updated life support notification must be sent by the initiator when the effective date is reached? AusNet Services assumes that an updated life support notification will not be sent unless there are changes to life support information.</p> <p>AusNet Services recommends the following suggested improvement:</p> <p><i>Where a life support registration with a future effective date is provided by a current retailer, prospective retailer or DNSP, the site is considered life support when the date effective = current date. The initiator may send an updated life support notification.</i></p>	<p>IEC/B2BWG – agree but these will be incorporated into the guide not the procedures.</p>
<p>60</p>	<p>AusNet Services</p>	<p>4.4.1(c)</p>	<p>4.4.1</p>	<p>AusNet Services considers a minimum amount of time is required to process life support notifications with a prospective date.</p> <p>We suggest the following addition to establish this minimum requirement.</p> <p><i>Prospective life support notifications must be sent no less than 48 hours before required as a minimum.</i></p> <p>Processing prospective life support notifications is time consuming and this restriction on short notice prospective life support notifications is appropriate to ensure recipients are able to meet their obligations.</p>	<p>IEC/B2BWG – disagree. No window required. Rules require notification of status but don't provide for processing time.</p>

61	Endeavour Energy		4.4.1.b	Procedure improvement: For consistency, the term Life Support Notification with an underline should not have spaces between the words.	IEC/B2BWG - Editorial - updated
62	Energy Queensland		4.4.1(b)	<p>Further to subclause (b), Energex and Ergon Energy consider a further subclause should be included as follows:</p> <p>“Where either the Current Retailer or DNSP become aware of a change specific to the ‘LifeSupportStatus’ they must notify the other party using a <u>LifeSupport Notification</u> with the information defined in Table 9.”</p>	<p>IEC/B2BWG – believe the wording covers the scenarios where this would happen.</p> <p>The only time a retailer or DNSP will become aware of information that wasn’t provided by the customer will be within the de-registration process and (d) covers that.</p> <p>(d) has also been modified to reflect that a deregistration can be performed by a prospective retailer.</p>
63	United Energy		4.4 (c)	Procedures should explicitly state that Retailer is the owner of the life support information for registration and derigstration to ensure there is no ambiguity in the process for adding or removing flags.	IEC/B2BWG – NERR state that either party can be a registration owner.

64	Endeavour Energy		New clause 4.4.1.c and move subsequent clauses down	<p>Procedure improvement: The procedure should define a SLA for sending the life support notification. We suggest a new clause 4.4.1.c (and move subsequent clauses down) with the following words:</p> <p>[Guidance Note 1] The Initiator of the LifeSupportNotification must use best endeavours to send the notification immediately but no later than 1 business day from when life support information is created or updated.</p>	IEC/B2BWG – new clause added 4.4.1 (e). IEC/B2BWG disagree on immediate.
65	Endeavour Energy		New clause 4.4.1.d and move subsequent clauses down	<p>Procedure improvement: For the avoidance of any doubt it should be made clear that the registration of life support must only be for the customer's premises requiring life support equipment. If the customer has other premises but do not require life support equipment at those premises then life support must not be registered for those premises. This would avoid the unnecessary growth of invalid life support registrations. We suggest a new clause 4.4.1.d (and move subsequent clauses down) with the following words:</p> <p>[Guidance Note 2] The DNSP or Retailer must only register life support for the customer's premises requiring life support equipment. Any other premises of the customer that does not require life support equipment must not be registered as life support.</p>	IEC/B2BWG – agree but these will be incorporated into the guide not the procedures

<p>66</p>	<p>Energy Queensland</p>		<p>4.4.1(e)</p>	<p>Energex and Ergon Energy consider that use of the word “may” in clause 4.4.1(e)(ii) has the potential to lead to misaligned data and inaccurate life support registers. We therefore recommend that the Guidance Note should be amended to read as follows:</p> <p style="padding-left: 40px;">“[Guidance Note 1] Where the Retailer who is not the Current Retailer wishes to advise the DNSP that has provided a LifeSupportNotification to the DNSP and life support registration is no longer required, <u>the Retailer must wait until they are the Current Retailer before providing the DNSP with a LifeSupportNotification advising that Life Support registration is no longer required:-</u></p> <p style="padding-left: 40px;">(i) The Retailer must send the DNSP an updated LifeSupportNotification and</p> <p style="padding-left: 40px;"><i>(ii) The DNSP may update their records accordingly.”</i></p>	<p>IEC/B2BWG – refer to NERR it requires the retailer to advise of intending life support requirements. If the customer advises a retailer they require life support for a future date and the retailer is not the current retailer at the time of notification then the prospective retailer has the obligation to de-register if the life support requirements are no longer required, they must send a de-registration life support notification.</p>
<p>67</p>	<p>Momentum</p>	<p>-</p>	<p>4.4.1(f)</p>	<p>(f) [Guidance Note 2] following a successful change of retailer, where the prospective Retailer is the registration process owner, the Current Retailer must send to the DNSP a LifeSupportNotification</p>	<p>IEC/B2BWG – agree but these will be incorporated into the guide not the procedures</p>

<p>68</p>	<p>Endeavour Energy</p>		<p>New clause 4.4.1.f</p>	<p>Procedure improvement: It should be made clear how long life support information must be made available online and archived. Without this clarification it could be interpreted that this information must be kept indefinitely, which can be costly. Given that it is industry practice to reconcile life support information 4 times a year we suggest that life support information must always be kept online while life support is registered for the premises. When life support is de-registered then the life support information must be accessible for at least 7 years with the first 2 years being online.</p> <p>We suggest a new clause 4.4.1.f with the following words:</p> <p>4.4.1.f [Guidance note 1] The DNSP and Retailer must</p> <ul style="list-style-type: none"> (i) keep life support information online in an accessible format while the NMI is registered as life support; (ii) keep life support information online in an accessible format for at least 2 years from the life support deregistration date; and (iii) following the retention under subparagraph (ii), in an accessible format for an overall period of not less than 7 years from the life support deregistration date. 	<p>IEC/B2BWG – this is not to be included in the procedures as the procedures are about B2B communications. Laws and rules provide participants with retention and archiving requirements.</p> <p>Refer NER 1.9</p>
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69	Endeavour Energy		New clause 4.4.1.g	<p>Procedure improvement: For the avoidance of any doubt it should be made clear that existing life support customers should have the status of ‘Registered - Medical Confirmation with DNSP’ if the DNSP has the medical confirmation, ‘Registered – Medical Confirmation with Retailer’ if the retailer has the medical confirmation, otherwise the premises should have the status of ‘Registered - No Medical Confirmation’. The initial population of life support information in participant’s systems for 1 February 2019 must not trigger life support notifications. We suggest a new clause 4.4.1.g with the following words:</p> <p>4.4.1.g [Guidance Note 1] The DNSP and Retailer must initially set the status of premises with life support as:</p> <ul style="list-style-type: none"> (i) ‘Registered - Medical Confirmation with DNSP’ if the DNSP has the medical confirmation; (ii) ‘Registered – Medical Confirmation with Retailer’ if the retailer has the medical confirmation; or (iii) ‘Registered - No Medical Confirmation’ if the DNSP or Retailer do not have the medical confirmation <p>The initial population of life support information in participant’s systems for 1 February 2019 must not trigger life support notifications</p>	IEC/B2BWG – agree but these will be incorporated into the guide not the procedures
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70	Jemena		4.4.2.c	<p><i>If a Life Support Notification is not received within 5 business days the Initiator may contact the Recipient.</i></p> <p>Jemena suggests changing the time period to 2 business days considering the crucial importance of the transaction.</p>	IEC/B2BWG – no change (b) provides between 2 and 5 days so the follow up can't be prior to 5 days. Retailers may require up to 5 days to allow them investigation time with their customer.
71	Origin	4.5		<p><u>Clarification Required:</u></p> <p>Clause (a) specifies that parties “can” adopt the following processes in clause 4.5.</p> <p>The following clause (b) then specifies that a Customer Details Reconciliation “must” use the <u>CustomerDetailsNotification</u>.</p> <p>As there is only one transaction that can be used for a Customer Details Reconciliation should clause (a) be changed from “can” to “should” or “must” or is there another method participants can adopt to undertake a reconciliation?</p>	IEC/B2BWG – agree. Clause amended
72	Origin	4.5 (a)		Where it says, “can adopt the following processes described below” it should refer to the relevant clauses as it specifies “must” in subsequent clauses.	IEC/B2BWG - Refer 71
73	TasNetworks		Clause 4.5 (a)	Remove “space” at start of second line before the word “following”	IEC/B2BWG - Refer 71
74	TasNetworks		Clause 4.5 (d)	Suggest changing the words “Customer Details Changes” to “changes in Customer information”	IEC/B2BWG - agree

75	EnergyAustralia	4.5	Suggest add clause 4.5(d)	<p>Suggest adding a clause 4.5(d). This explicitly allows the retailer and the MP (or the DNSP if it chooses to do so) to reconcile the CDN life support flag and implies that the life support flag in the CDN must be kept accurate.</p> <p>4.5(d) If agreed between parties, the CustomerDetailsNotification can be used for the purposes of reconciliation of life support.</p>	IEC/B2BWG - Refer 71
76	EnergyAustralia	4.6	General comment	<p>There is a requirement for life support reconciliations, currently undertaken using the CDN, four times a year. We suggest that the transition, cutover and transfer of life support data is managed and market participants reach agreement that the requirement is either partly waived in 2019 or agreed to be undertaken at a later stage in after Q2 of 2019 (i.e. June onwards)</p>	IEC/B2BWG – agree. A transitional plan will need to be created.
77	Origin	4.6 (a)		<p>Where it says, “can adopt the following processes described below” it should refer to the relevant clauses as it specifies must in subsequent clauses.</p>	IEC/B2BWG – removed ‘can adopt the following processes described below’.

78	Energy Queensland		4.6(a)	<p>It is recommended that clause 4.6(a) should be amended as follows:</p> <p style="padding-left: 40px;">“Current Retailers can agree with any party the DNSP to conduct regular reconciliations and can adopt the following processes described below.</p> <p>In our view, Life Support reconciliation should only be permitted between the DNSP and the Current Retailer. The involvement of multiple parties would result in a more complicated process and increase the risk of inaccurate data.</p>	IEC/B2BWG – disagree. Life support reconciliations can be performed with other parties by agreement not just DNSPs.
79	Jemena		4.6.b	<p><i>[Guidance Note 1] Current Retailers and DNSPs must conduct a reconciliation of Life Support Details for NMIs with Life Support customers at least four times per year.</i></p> <p>Jemena suggests changing the reconciliation timeframe to Quaterly (i.e. once every quarter of a year), instead of ‘at least 4 times per year’ as this will ensure that reconciliation is performed in a periodic manner.</p>	IEC/B2BWG – agree. Updated to quarterly.
80	Origin	4.6 (b) & (f)		<p><u>Clarification Required:</u></p> <p>As Current Retailers and DNSPs must conduct a reconciliation of Life Support Details for NMIs with Life Support customers at least four times per year and clause (f) allows for both parties to agree on the timing can it also be included that the four times per year is once per quarter?</p>	IEC/B2BWG - Refer 79

81	AusNet Services		4.6 (d)	<p>Treatment of a life support registration with a future <i>date required</i> where the retailer is already the current retailer for the NMI. e.g in the case a new customer is moving into the site and the retailer is not changing.</p> <p>Will these NMIs be included in the life support reconciliation? We would suggest not, and recommend the B2B Procedures clarifying this.</p> <p>Suggest the following:</p> <p><i>“Life support registrations for NMIs where the date effective is after the current date will not be considered in the reconciliation process”</i></p>	IEC/B2BWG – disagree with the suggested wording and have updated the clause to clarify that current and future registrations should be included in the reconciliation process.
82	Endeavour Energy		4.6.e	Procedure improvement: For consistency, the term Life Support Reconciliation with an underline should not be underlined.	IEC/B2BWG - Editorial - updated
83	AGL	4.6(f)		<p>Comment</p> <p>This clause should be after clause (c) as it relates to timing;</p>	IEC/B2BWG - agree
84	Red and Lumo Energy	4.6(f)		<p><u>Editorial suggestion</u></p> <p><i>(f) The Retailer and DNSP must agree to the timing of the Life Support Reconciliation.</i></p>	IEC/B2BWG - agree

85	Red and Lumo Energy	4.6(g)	4.6(h) (additional clause to follow (g))	<p><u>Comment and suggested improvement</u></p> <p>Clause 4.6(g) outlines the obligation where a NMI is registered as life support in the DNSPs system but is not in the Retailer’s system. The converse situation also needs to be covered in the Procedures.</p> <p>This will avoid inconsistencies in how the converse situation will be treated.</p> <p>We propose an additional clause be added that clarifies this:</p> <p><i>(h) For NMIs not registered in the DNSP’s system with Life Support but not provided by the Retailer in the Life Support Reconciliation process the DNSP must send a LifeSupportNotification with the Reason value of ‘Reconciliation’ within 2 business days of the last Life-Support Reconciliation transaction being received. must update their records and send a LifeSupportRequest with the Reason ‘Reconciliation – Confirm Life Support Details’.</i></p>	IEC/B2BWG – disagree Believe that inconsistencies will still occur between the parties as there is not an obligation by either party to update their systems with deregistration information but if they were notified of a registration and this may be done via the reconciliation process then the expectation would be that the parties would update their systems.
86	TasNetworks		Clause 4.6 (i)	Suggest changing the words “Life Support Changes” to “changes in Life Support information”	IEC/B2BWG - agree
87	AGL	4.6(f), 4.6(g)		Editorial – for consistency with other clauses <u>Current</u> Retailer...	IEC/B2BWG - agree
88	TasNetworks		Clause 4.8 (a)	Suggest changing the words “Site Access Changes” to “changes in Site Access information”	IEC/B2BWG - agree
89	TasNetworks		Clause 4.8 (e)	Suggest changing the words “Site Access changes” to “changes in Site Access information”	IEC/B2BWG - agree

90	EnergyAustralia	5.1	Modification to clause	<p>Disagree that the ConfirmLifeSupport value is obsolete. The CDR might still be used by the MP to confirm there is life support at the site.</p> <p>Table 5 Data Requirements for CustomerDetailsRequest Reason field allowed values:</p> <p>Confirm Life Support (obsolete, no longer used for CDR) Only to be used if agreed between parties. Life support should be confirmed using the LSR process in 4.4.2</p>	IEC/B2BWG - agree
91	Energy Queensland		5.1 CustomerDetailsRequest Data (Table 5)	<p>“No response to rejected CDN” under the “Reason” field is now obsolete. It is therefore recommended that a comment for this allowed value should be included as follows:</p> <p>“No response to rejected CDN <u>obsolete and no longer used for CDR</u>”.</p>	IEC/B2BWG – disagree IEC/B2BWG believe this reason is still used in the industry
92	TasNetworks		Clause 5.2 Table 6	In the BusinessName field add the statement “Refer to B2B Procedure: Technical Delivery Specification”	IEC/B2BWG - agree
93	TasNetworks		Clause 5.2 Table 6	<p>In the SensitiveLoad field it is suggested to make the following grammatical changes:</p> <p>“The value “Sensitive Load” is used to indicate that the Initiator reasonably believes there are economic, health or safety issues with loss of supply of to the Connection Point, other than Life Support ones.”</p>	IEC/B2BWG - agree

94	Energy Queensland		5.2 CustomerDetailsNotification Data (Table 6)	The allowed value of “Life Support” under the SensitiveLoad field is now obsolete. It is recommended that a comment be included as follows: “Life Support <u>obsolete, refer to LifeSupport Notification process 4.4.1</u> ”.	IEC/B2BWG – this field is still required for parties other than DNSP’s and Retailers. The principle applied was that no material changes be made to the CDN process.
95	Energy Queensland		5.2 CustomerDetailsNotification Data (Table 6)	Energex and Ergon Energy recommend the following amendment to the definition/comments relating to SensitiveLoad: “The value ‘Sensitive Load’ is used to indicate that the Initiator reasonably believes there are economic, health or safety issues with loss of supply of the Connection Point, other than Life Support ones. Where Life Support and Sensitive Load both apply to a Connection Point, the Life Support value must be provided <u>via a LifeSupportNotification</u> . ‘None’ also applicable if the Site is vacant.”	IEC/B2BWG - Refer 94
96	TasNetworks		Clause 5.4 Table 8	The SiteAccessNotification Data table includes Field values related to the NMW transaction that need to be removed.	IEC/B2BWG - Editorial - updated
97	United Energy		5.5 Table 9	Life support notification includes Site address, Optional. Site address notification previously removed from market transactions as unreliable, incomplete and not utilised, therefore should not be included in Life support notification.	IEC/B2BWG – disagree This field is optional and participants can elect not to populate it.

98	CitiPower Powercor		5.5 Life Support Notification Data Table 9: Data requirements for LS Notification	CitiPower Powercor suggests that the Site Address field in the LS Notification transaction is removed. Site address information has previously been removed from market transactions due to it being unreliable, incomplete or not formatted correctly. Site address information should only be provided by the distributor through the current CATS process. We will not use this information to validate the customer nor for any other reason; hence we don't see the value of including this field in this transaction.	IEC/B2BWG - Refer 97
99	TasNetworks		Clause 5.5 Table 9	Change the Format of the Reason Field to VARCHAR (14) as this is similar in use to the Movement Type Field in the CDN	IEC/B2BWG - agree
100	EnergyAustralia	5.5	Clarification	Reason is Varchar(40) while CDN has same values in MovementType but Varchar(14).	IEC/B2BWG - Refer 99

101	Endeavour Energy		Table 9	<p>LifeSupportStatus</p> <p>Procedure improvement: The value of None should only be used if the participant is not aware of a NMI ever having life support. If the participant is aware that at some point in time the NMI had life support but is currently deregistered then one of the appropriate deregistered values should be provided. This will help with deregistration notifications that were missed without having to manually contact the recipient for the key information which are the deregistration reason and the deregistration date. To help with any concern about having to keep life support information available online for an indefinite period of time therefore we have suggested earlier that the information is only required online for 2 years from the life support deregistration date.</p> <p>We suggest updating the definition to:</p> <p>'None' means that the participant's online system doesn't have a current Life Support requirement for the premises</p>	IEC/B2BWG – procedure has been updated to include the reason of 'other' in the request. This will allow participants to put in special notes if they wish to receive more information.
102	Endeavour Energy		Table 9	<p>LifeSupportStatus</p> <p>Procedure improvement: The field length needs to be increased to accommodate the allowable values. We raised this in the initial consultation and it was accepted but the document was not updated.</p> <p>We suggest changing the format of LifeSupportStatus to VARCHAR(50)</p>	IEC/B2BWG - Editorial - updated
103	EnergyAustralia	5.5	Clarification	LifeSupportStatus has Varchar(30) but allowable values are much longer	IEC/B2BWG – refer 102

104	AGL	5.5 Table 9 Field: LifeSupport Status		<p>The category 'Registered – No Medical Confirmation' should also be delineated by Distributor and Retailer in the same way that 'Registered – Medical Confirmation' is, ie:</p> <ul style="list-style-type: none"> Registered - No Medical Confirmation with DNSP Registered - No Medical Confirmation with Retailer 	IEC/B2BWG – added a registration process owner field, yes/no to 5.5
105	TasNetworks		Clause 5.5 Table 9	Change Format of LifeSupportStatus Field to VARCHAR (50) to cater for largest allowable value	IEC/B2BWG - Editorial - updated
106	Red and Lumo Energy	5.5		<p><u>Comment and suggested amendments</u></p> <p>The length of some of these fields have been raised as a concern, for example: <i>LifeSupportStatus is VARCHAR (30) however the allowable Values exceed the limit.</i></p> <p>We propose to increase the character limits to field such as:</p> <ul style="list-style-type: none"> Contact Email address LifeSupportStatus LSEquipment 	IEC/B2BWG - Refer 102,112,115
107	Endeavour Energy		Table 9	<p>DateRequired</p> <p>Procedure improvement: The deregistration date should be provided when responding to a Life Support Request and the life support status is de-registered. We suggest updating the last paragraph of the definition to:</p> <p>For a response to a Life Support Request, this will be the effective date of the Life Support registration or deregistration in the participant's online system. Not required when LifeSupportStatus is None.</p>	IEC/B2BWG - Refer 101

108	TasNetworks		Clause 5.5 Table 9	<p>The Format of the DateRequired Field, being DATE, is not defined in the B2B Procedure: Technical Delivery Specification.</p> <p>It is recommended that the Format be changed to DATE(8) or DATE(10)</p>	IEC/B2BWG – disagree refer to TDS section 3.2
109	Origin	5.5		<p>Why can't LSN deregistration be for a future date?</p> <p>The Definition/Comments for the <i>DateRequired</i> field states that "For a registration of Life Support, this date will be either the current date or a future date", but "For a deregistration of Life Support, this will be either the current date or a retrospective date"</p> <p>If we could select a future date for deregistration, we could solve some of our CDN (now LSN?) timing issues for a LS move out, i.e. we could notify on which date LS will no longer be applicable and therefore when we could raise a De-energisation</p>	IEC/B2BWG – obligations remain until you officially de-register life support.

<p>110</p>	<p>AusNet Services</p>		<p>Table 5</p>	<p>AusNet Services considers that where life support status is “Deregistered”, the <i>date required</i> cannot be retrospective. If it were deregistered retrospectively, it would give rise to conflicts between participants treatment actions undertaken, potentially invalidating actions that demonstrate compliance with the Rules or Codes such as rejection of de-energisation Service Orders.</p> <p>If deregistration cannot be retrospective, the value of deregistration against the life support status can only be valid for the current day and communicated to participants on this day. We suggest providing a consistent view of treatment of the site on date communicated for deregistration given the time communicated to a recipient could be different across participants.</p> <p>Suggested wording:</p> <p style="padding-left: 40px;">“For de-regisration, the <i>date required</i> must be the current date. De-registration will become effective in the recipient system no earlier than deregistration date + 1 calendar day.”</p> <p>Thus, it is assumed that where the deregistration date + 1 calendar day = current date, the life support status for the NMI = None.</p>	<p>IEC/B2BWG – the date required is the date the initiator believes their obligations for providing protections has ceased. This could be retrospective by the time the recipient receives the transaction.</p>
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<p>111</p>	<p>AusNet Services</p>		<p>Table 5</p>	<p>We consider that clarification is required surrounding the use of the <i>date required</i> field, and whether this is tied to changes to the life support status field only or changes to any information provided in the life support notification record. In that, where the life support record was previously registered has changes to information (e.g. phone number, contact name) the <i>date required</i> field will be the date the life support was registered and not the date of the changed record. If this assumption is correct, then this needs to be clarified.</p> <p>We suggest:</p> <p style="padding-left: 40px;">Where supplementary information updates are made to registered life support records (<i>phone number, email address</i> etc), the <i>date required</i> field must align to the effective date of the latest <i>life support status</i> for the NMI.</p> <p>Further, introduction of a Record Id (refer to feedback item 5.5) could also help with identifying changes to existing life support registrations (supplementary details only) whilst maintaining the <i>date required</i> field as the life support registration date. If a Record Id is not introduced, the <i>date required</i> should be the date of the changes made to the life support record regardless of the life support status.</p>	<p>IEC/B2BWG – added a LastModifiedDate field. Wording has been updated to clarify what the date required field is.</p>
<p>112</p>	<p>TasNetworks</p>		<p>Clause 5.5 Table 9</p>	<p>It is suggested to reduce the Format field length of LSEquipment from VARCHAR (100) to VARCHAR (50) as it only needs to cater for the largest value available.</p>	<p>IEC/B2BWG - agree</p>

<p>113</p>	<p>Tango Energy</p>		<p>General – Life Support Equipment (Section 5.2)</p>	<p>Transactional Data Section 5.2 LSEquipment Varchar (100) R/NO/N</p> <p>The above field should be optional. Creating a new mandatory obligation in the procedures, that does not exist in the NERR is outside the remit of the IEC.</p> <p>Not only is this field not required by the NERR, making provision of this data mandatory has the following unnecessary impacts:</p> <ul style="list-style-type: none"> • Cost of processes, training and maintenance to capture/remove the information; • System change and associated costs to store the B2B Procedure values. <p>The NERR clearly sets out the mandatory information that must be held in both the Retailer and Distributors registers (See NERR clause 126(b)). Tango notes that 124 B subclause 1A requires Retailers to provide information to DNSP’s <i>for the purposes of updating the distributors registration</i> under the NERR (126(b)).</p> <p>The type of life support equipment is mentioned in the NERR as forming part of the medical confirmation form, not part of the Life Support Register, thus there is no obligation on a Retailer to independently record this information in their systems.</p> <p><i>Supporting NERR clauses</i></p> <p>With regard to the life support equipment, Tango acknowledges the NERR clause 124 B subclause 1A states:</p>	<p>IEC/B2BWG – believe that life support equipment falls under the category of relevant information as part of the information that is required to be shared between the parties as per 124 and 125 of the NERR.</p> <p>This is a required field at the moment which means if you have the information supply it, if you don’t have the information then don’t supply it.</p>
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				<p><i>give the distributor relevant information about the life support equipment requirements for the customer's premises and any relevant contact details for the purposes of updating the distributor's registration under subrule 124(4)(a) or 124(5), unless the relevant information was provided to the retailer by the distributor;</i></p> <p>Tango notes the purpose of provision of this data is for the DNSP to update their own registration. The register the Retailer and DNSP are required to maintain under the NERR does not include the type of equipment at the premise.</p> <p>Note NERR clause 126 (b) details the Life Support Register as:</p> <p><i>Ensure that life support equipment registration and deregistration details maintained in accordance with rules 124, 124A, 124B and 125 are kept up to date, including:</i></p> <ul style="list-style-type: none"> <i>(i) the date when the customer requires supply of energy at the premises for the purposes of the life support equipment;</i> <i>(ii) when medical confirmation was received from the customer in respect of the premises;</i> <i>(iii) the date when the premises is deregistered and the reason for deregistration; and</i> <i>(iv) a record of communications with the customer required by rules 124A and 125.</i> <p>From our reading of the NERR and Procedures we can find no justification for the provision of this data and question why it is required. All customers on life support should be treated equally regardless of the type of life support</p>	
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				equipment 'installed' at the customer's premises, therefore distinguishing the type of life support equipment is not critical and the requirement should be removed.	
114	TasNetworks		Clause 5.5 Table 9	It is suggested to increase the Format field length of LSContactEmailAddress from VARCHAR (40) to VARCHAR (100) to align with the CDN	IEC/B2BWG - agree
115	EnergyAustralia	5.5	Clarification	LSContactEmailAddress has varchar(40) while CDN has Varchar(100)	IEC/B2BWG - Refer 114
116	Endeavour Energy		Table 9	PreferredContactMethod Procedure improvement: This field should be 'Required' not 'Optional'. If the Initiator has this information then it must be provided.	IEC/B2BWG – disagree Enough information is required to be sent by the parties for them to make a determination on how they want to contact the customer. Some parties may not be able to support the preferred contact method even if it's stipulated.
117	Endeavour Energy		Table 9	New field called LastModifiedDateTime Procedure improvement: Now that the life support communication is a B2B transaction, the Life Support Notification should have a field called LastModifiedDateTime just like in the Customer Detail Notification. This field will help the Recipient handle out of sequence notifications.	IEC/B2BWG - Refer 111

<p>118</p>	<p>AusNet Services</p>		<p>5.5 (Table 9)</p>	<p>AusNet Services recommends the introduction of a matchable RecordId for life support registrations. The Record Id would help maintain data integrity and ensure key information is not inadvertently overridden. This is important for scenarios when a life notification is received and current (or multiple) life support records already exist.</p> <p>Under the proposed procedures, it is possible to have prospective and current life support registrations for a NMI where the same participant has registered both. This means the <i>participant ID</i> is not a reliable, stand-alone indicator.</p> <p>The use of the <i>daterequired</i> field is not sufficient in this scenario to identify which record is used to create or update as the <i>daterequired</i> field can change when life support status moves through the registration process (e.g. from “Registered – no medical confirmation” to “Registered – medical confirmation”).</p> <p>We suggest that:</p> <ul style="list-style-type: none"> • When the participant registers life support against a NMI, a record ID will need to be provided by them to the recipient. • When information is exchange between participants, the RecordId assign on creation by the participant, is provided in order to identify the correct record. • RecordId is mandatory, alphanumeric and unique to the participant initiating the change and life support record; for example the Initiator’s internal Customer ID or other generated number could be used. 	<p>IEC/B2BWG – disagree</p> <p>Contact details for life support information may not be the customer or the outage contact. B2BWG did not agree that a record id was required.</p>
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				The recipient would use this record id along with the initiator participant id (e.g. EASTERN) to maintain unique and matchable records.	
119	Origin	5.6		<p>The LifeSupportRequest data requirements is light on information for the receiving party. Origin propose additional reason fields be added to the LifeSupportRequest.</p> <ol style="list-style-type: none"> 1. Confirm Life Support 2. Confirm Life Support – Previous Retailer Registration - 3. Confirm Life Support - Reconciliation 	IEC/B2BWG – agree with changes New values added to 5.6.
120	Red and Lumo Energy	5.6		<p><u>Comment and suggested amendments</u></p> <p>We propose that a reason field be included in this transaction. It is important for both parties involved in identifying issues and priority of requests (such as non-response or missing information) and will enable parties to identify exceptions based on the reason for the request.</p> <p>This is similar to the reason field in the CustomerDetailRequest (section 5.1), while the fields in the LifeSupportRequest in comparison may not be fit for purpose there are legitimate reasons for the trigger of this request (LSR) and we expect this should be initiated when;</p> <ul style="list-style-type: none"> ● Life Support currently registered, no LSN received ● No response to rejected LSN ● Confirm Life Support details (Data Quality Issue) ● Other <p>Suggested amendment to this transaction is to include this as an additional field with the allowable values as listed above.</p>	IEC/B2BWG – agree with changes New values added to 5.6.

<p>121</p>	<p>EnergyAustralia</p>	<p>5.6</p>	<p>Modification</p>	<p>We suggest that an optional <i>Special Notes</i> field is included in the LSR so the requestor can provide some context. This is particularly useful given the situations where the LSR is used is not clear. The B2B Guide can be used to spell out general reasons this field might be used and how to populate, similar to what is done in the CDR.</p> <p>An alternative option we would support is for a Reason Code to be included in the LSR.</p> <p>Either/or both of:</p> <p>Reason code:</p> <ol style="list-style-type: none"> 1. Confirm Life Support 2. Confirm Life Support – Previous Retailer Registration 3. Confirm Life Support – Reconciliation <p>Reason code <i>ConfirmLifeSupport</i> would be sent when there is a mismatch of the retailer’s customer record and the distributor’s record.</p>	<p>IEC/B2BWG – agree with changes New values added to 5.6.</p>
<p>122</p>	<p>United Energy</p>	<p>5.6</p>	<p>5.6</p>	<p>Life support request data does not include special notes field, this is still required information where requested or provided. The field is available for section 5.5. but not 5.6. This is also required for 5.6 Life Support Request Data.</p>	<p>IEC/B2BWG – agree with changes New values added to 5.6.</p>
<p>123</p>	<p>CitiPower Powercor</p>	<p>5.6 Life Support Request Data</p>	<p>5.6 Life Support Request Data</p>	<p>CitiPower Powercor suggests that the Life Support Request transaction also include a ‘Special Notes’ field for participants to provide additional information about the nature of the request. This field is available in the Notification transaction and it should also be available in the Request transaction, also keeping it consistent with the current CDR process.</p>	<p>IEC/B2BWG – agree with changes New values added to 5.6.</p>

124	AusNet Services		5.6	As per the above suggestion, we recommend adding an identifier for the life support request data. This supports the model of multiple life support registrations co-existing for a single NMI.	IEC/B2BWG - Refer 118
125	EnergyAustralia	5.6	General comment	<p>In the scenario where:</p> <ul style="list-style-type: none"> - Retailer A signs up customer and provides LSN to distributor - Customer churns to Retailer B - Retailer B sends a LSR to distributor - Distributor responds to Retailer B with a LSN, based on the information that was provided by Retailer A initially before the churn <p>In this scenario a distributor is not the process owner and receives a Life Support Request (LSR) from a retailer, it has to send a LSN in response to comply with its obligations under 124B(2)(a)(i) of the NERR;</p> <p>It needs to be clarified what information the distributor is obliged to provide in this situation as there might be privacy concerns about using the information provided by Retailer A to be provided to Retailer B.</p> <p>Clarification and agreement on when a LSR should be used by the retailer would assist in this instance.</p>	IEC/B2BWG – each party needs to understand what their obligations are under the privacy act and provide information based on their obligations.
126	Origin	5.7		<p>Under Definition/Comments for Event Code “Table 10” should be changed to “Table 12”.</p> <p>Under Definition/Comments for Explanations this should also refer to “Table 12”.</p>	IEC/B2BWG - Editorial - updated

127	Energy Queensland		5.7 BusinessAcce ptance/Reject ion (Table 11)	The reference to “Table 10” in Table 11 should be amended to read “Table 12”.	IEC/B2BWG - Editorial - updated
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