

## B2B Procedures

- Customer and Site Details
- Service Orders (version change)
- Meter Data (version change)
- One Way Notification (version change)
- Technical Delivery Specification (version change)

## CONSULTATION – Draft Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:*** EnergyAustralia

***Completion Date:*** 19 June 2018

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## Customer and Site Details

Participant Name	Old Clause No	New Clause No	Comments
EnergyAustralia	4.1(b)	Modification	For the purposes of registration and deregistration or updating of life support details <b>between Retailers and DNSPs</b> , Retailers and DNSPs must use the LifeSupportNotification <del>and not CustomerDetailsNotification.</del>
EnergyAustralia	4.1(h)	Clarification	<p>Clarify situations where retailer should be providing an LSR</p> <ul style="list-style-type: none"> <li>- 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)</li> <li>- Retailer then contacts the customer who provides an update to the information, which does not match what the distributor has provided</li> </ul> <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>

Participant Name	Old Clause No	New Clause No	Comments
EnergyAustralia	4.3.2(a)	Add to clause	4.3.2. Sensitive Load Field  (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. <b>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.</b>
EnergyAustralia	4.4.2	General comment	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.
EnergyAustralia	4.5	Suggest add clause 4.5(d)	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.  <b>4.5(d) If agreed between parties, the CustomerDetailsNotification can be used for the purposes of reconciliation of life support.</b>
EnergyAustralia	4.6	General comment	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)

Participant Name	Old Clause No	New Clause No	Comments
EnergyAustralia	5.1	Modification to clause	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.  Table 5 Data Requirements for CustomerDetailsRequest  Reason field allowed values:  Confirm Life Support <del>(obsolete, no longer used for CDR)</del> Only to be used if agreed between parties. Life support should be confirmed using the LSR process in 4.4.2
EnergyAustralia	5.5	Clarification	Reason is Varchar(40) while CDN has same values in MovementType but Varchar(14).
EnergyAustralia	5.5	Clarification	LifeSupportStatus has Varchar(30) but allowable values are much longer
EnergyAustralia	5.5	Clarification	LSContactEmailAddress has varchar(40) while CDN has Varchar(100)

Participant Name	Old Clause No	New Clause No	Comments
EnergyAustralia	5.6	Modification	<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"><li>1. Confirm Life Support</li><li>2. Confirm Life Support – Previous Retailer Registration</li><li>3. Confirm Life Support – Reconciliation</li></ol> <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>

Participant Name	Old Clause No	New Clause No	Comments
EnergyAustralia	5.6	General comment	<p>In the scenario where:</p> <ul style="list-style-type: none"><li>- Retailer A signs up customer and provides LSN to distributor</li><li>- Customer churns to Retailer B</li><li>- Retailer B sends a LSR to distributor</li><li>- Distributor responds to Retailer B with a LSN, based on the information that was provided by Retailer A initially before the churn</li></ul> <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>

## General response

EnergyAustralia's general comments relate to:

- Consultation process and implementation timeframes
- Metering

### Consultation process and timing

Thank you for the opportunity to provide feedback. While EnergyAustralia is not a voting member of the B2BWG or the IEC, we are pleased to have actively participated in the working group and drafting of the procedures as an observer and hope the B2BWG and AEMO continues with its consultative approach.

We note there has been a significant change in the IEC decision between the first and second consultation stage, leaving significantly less time for participants to implement the option chosen by industry. Industry participants now have approximately 6 months to implement and test a significant IT and schema change from 23 July (when the B2B Procedures are finalised) by 1 February 2019, with testing likely to take place over the 2018-19 Christmas and New Year holiday period. In addition, the AER is also expected to provide further guidance in October/November on its compliance expectations during these situations, which might have an impact on the system changes that are needed.

This is a very tight timeframe and any further significant changes will result in even greater challenges to successfully implementing these complex industry changes. We consider that each option considered by the IEC had its merits and disadvantages, and that it is not practicable to restart the consultation process for Option 2, the B2B transaction option, due to the requirement to comply with the AEMC rule changes by 1 February 2019.

Our view is that the IEC and AEMO should proceed with the solution as it is, with no further major changes to the existing B2B transaction option chosen, to allow industry sufficient time to implement a workable solution. It would be useful if the IEC, AEMO, using appropriate powers, are able to guide industry in agreeing clear and realistic industry timeframes for implementation and testing and making these transparent to participants and other relevant stakeholders (such as the AER and AEMC) as soon as possible.

### Metering

During Power of Choice (POC) changes made on 1 December 2017, an industry solution was agreed for third-party Metering Providers (MP) to be able to request and be provided information when a retailer planned interruption occurs and a vulnerable or life support customer has to be taken off supply to perform metering works through use of the Customer Details Request (CDR), and being returned with a CDN. The B2B communication between the retailer



and MC/MP is increasing in importance as the MP encounters increasingly complex scenarios such as locked meter boxes, and multi occupancy situations. Further industry discussions also foreshadow the ability to be able to re-energise or de-energise a customer remotely outside of Victoria.

The current solution proposed by the IEC for industry, retains the life support status and information in the CDN needed by the third party Metering Provider, without needing to make changes to the CDN schema or process. In addition, this solution also retains customers' rights to privacy of their life support details, which may not be appropriate to provide to a commercially engaged third party Metering Provider. This also ensures that industry continues to have an agreed process for protecting vulnerable life support customers while ensuring that they get the full benefits of the POC metering reforms and access to a smooth meter exchange process.

While retailers and their metering parties have bilateral contractual arrangements and may flexibly make appropriate arrangements within this proposed solution, we don't see this is a robust solution suitable for the long-term. The issue is that the LSN will be used by retailers to communicate life support details to DNSPs, and retailers will use the CDN and/or other bespoke transactions to communication life support details to metering parties. This means that all retailers will be using multiple types of transactions to communicate the same information to different parties. This is not an efficient or robust solution and we feel it should be replaced in the medium to longer-term when parties have more time to make more extensive system changes. Throughout this consultation the need to meet the 1 February 2019 deadline, flexibility, and low cost solutions has overridden the need for retailers and metering parties to have good procedures in place to support compliance with life support regulations.

There are a few options which include manual processes, LSN/LSR, or CDN; having a robust and efficient option for retailer and MC/MP to contract ultimately protects and benefits the customer.

We therefore recommend that:

- No further changes are made to the Customer Details Notification (CDN), and support the IEC option 2 being implemented;
- CDNs should continue to be updated with accurate life support information and acknowledged as important industry information; and that
- A better long-term solution is assessed for later implementation.

Please contact Shawn Tan at 03 8628 1512 or [shawn.tan@energyaustralia.com.au](mailto:shawn.tan@energyaustralia.com.au) should you wish to discuss in further detail.