

B2B Procedures

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

CONSULTATION – Draft Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet Services

Completion Date: 19/06/2018

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Customer and Site Details

Participant Name	Old Clause No	New Clause No	Comments
AusNet Services		4.3.1(e)	<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> <p><i>- notify the DNSP by way of sending a life support notification.</i></p>
AusNet Services	4.4.1(c)	4.4.1	<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>

Participant Name	Old Clause No	New Clause No	Comments
AusNet Services	4.4.1(c)	4.4.1	<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>
AusNet Services		Table 5	<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>“For de-registration, 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>

Participant Name	Old Clause No	New Clause No	Comments
AusNet Services		Table 5	<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>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>

Participant Name	Old Clause No	New Clause No	Comments
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>

Participant Name	Old Clause No	New Clause No	Comments
AusNet Services		5.5 (Table 9)	<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 exchanged 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>The recipient would use this record id along with the initiator participant id (e.g. EASTERN) to maintain unique and matchable records.</p>

Participant Name	Old Clause No	New Clause No	Comments
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.

