

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: SA Power Networks

Completion Date: 14 June 2018

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0. Example Submission (Please delete this section)

General Instructions

- 1. Please keep information in the clause numbers simple - eg no titles, comments etc. – put titles and text in the comment section*
- 2. Please use a individual row for each comment on any each clauses*
- 3. Old clauses only needed if there is no equivalent clause within the revised draft procedures.*
- 4. If an obligation exists in another instrument please identify the instrument and clause to assist in including guidance notes.*
- 5. Please only include comments either with suggested changes, issues or support. Please do not include 'No Comment'.*
- 6. See example below:*

Participant Name	Old Clause No	New Clause No	Comments
	1.42(a)	2.15(a)	Service Order response Change response list from varchar(250) to an enumerated list
	1.42(a)	2.15(a)	Suggest add 'Other' as part of enumerated list and add free text to support other
		2.25(a)(ii)	Table 5 "Description of use" should be reworded to "Description of typical use"
		3.6(a)	The MDP SLP (c 3.5.2) requires the meter serial ID to be provided. Suggest the MeterSerialID be added to the transaction.
		3.6(a)	Ensure MeterserialID is the same field used in other procedures
		2.15	Ensure character length for MeterSerialID matches MSATS field length

1. Customer and Site Details

Participant Name	Old Clause No	New Clause No	Comments
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SA Power Networks		Overall Procedure Changes	<p>SA Power Networks are supportive in principle of the change in direction made by the IEC between the first stage consultation and the current draft determination. However, we are very concerned that this major change in direction from the easy to implement email solution to the current formal B2B “XML” based system transaction puts SA Power Networks in a very real position of not being able to deliver the required internal system changes and therefore being non compliant when these new B2B Procedures become effective on 1 February 2019.</p> <p>This major change in direction requires a significant IT investment to support the management of the required transactions – use of the AEMO B2B LVI is not possible for our business (our current market transaction systems automatically attempt to extract all transactions within the gateway well ahead of an individual user being able to access them directly via the LVI).</p> <p>SA Power Networks understands that the solution options had been rigorously debated by the Industry and the IEC ahead of the publishing of the first stage consultation and a clear decision was made to proceed with a short term email solution to avoid putting the industry under delivery timeframe pressures, avoid unwarranted financial investment and enable the development of the best long term solution (noting that the majority of Industry indicated that a Central Repository was the preferred long term solution).</p> <p>Based on this previously agreed short term direction, no allowance had been made to internal budgets or system development roadmaps to cater for this change. It appears that the IEC has not considered the full set of flow on impacts of this change in direction to the wider industry. SA Power Networks expects that most businesses require early indication on the direction of major industry changes and when changes to B2B Procedures result in the development of new “XML” transactions and schema that a minimum of 12 months is provided from the point of final determination to enable the required internal developments to occur.</p>
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Participant Name	Old Clause No	New Clause No	Comments
			SA Power Networks have commenced internal work to determine how we may be able to stage any internal developments to provide a capability that enables us to achieve compliance, but we are not in a position to confirm this at the time of making our submission. Even in the unlikely event that we are able to rush changes to IT systems through, there wont be time for adequate testing or to fix any defects identified. This is not a function we want to risk non compliance so we are calling out early that we have significant concerns of meeting a 1 Feb 2019 implementation date. As its stands, all of the back end processing work is going to need to be handled manually as there isn't the time to develop automation.

