

19 June 2018



Ms Audrey Zibelman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

Dear Ms Zibelman

B2B Procedure Changes

Energy Queensland appreciates the opportunity to provide a submission to the Australian Energy Market Operator (AEMO) on the second stage of consultation on proposed B2B Procedure changes published on 25 May 2018. AEMO is consulting on amendments made to the B2B Procedure as a result of the Australian Energy Market Commission's final determination on the strengthening protections for customers requiring life support equipment rule change on behalf of the Information Exchange Committee (IEC).

Energy Queensland supports amendments to the B2B Procedure to facilitate the use of a B2B transaction solution to meet the new life support obligations from 1 February 2019. Feedback on the proposed changes is provided in the attached participant response template. Energy Queensland also remains supportive of the proposal to further explore the development of a central repository for life support registrations as a potential long-term solution.

Energy Queensland acknowledges the significant work undertaken to date by the IEC, B2B Working Group and AEMO and would welcome being involved in any further engagement on development of the B2B Procedure.

Should you require additional information or wish to discuss any aspect of the attached submission, please do not hesitate to contact either myself on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours sincerely

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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: Energy Queensland

Completion Date: 19 June 2018

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Customer and Site Details

Participant Name	Old Clause No	New Clause No	Comments
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>
Energy Queensland		2.2(a)(iii)	<p>This clause should be amended to read as follows:</p> <p>“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>”</p>
Energy Queensland		2.2(b)	<p>The reference to “Figures 1-5” in clause 2.2(b) should be amended to read “Figures 1-5 4”.</p>
Energy Queensland		2.2 Figure 3: Overview of Customer Details Reconciliation Process	<p>The heading for Figure 3 requires amendment to: “Overview of Customer Details Reconciliation <u>Notification</u> Process”.</p> <p>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”.)</p>
Energy Queensland		3.1(a)	<p>The reference to “Figures 1-5” in this clause should be amended to read “Figures 1-5 4”.</p>

Participant Name	Old Clause No	New Clause No	Comments
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>
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>
Energy Queensland		4.3.1(e)	<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>

Participant Name	Old Clause No	New Clause No	Comments
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>
Energy Queensland		4.3.2(c)	<p>This clause should be amended to read:</p> <p>“If neither of the above conditions <u>does not</u> apply then the SensitiveLoad field should have a value of ‘None’.”</p>
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>

Participant Name	Old Clause No	New Clause No	Comments
Energy Queensland		4.4.1(e)	<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>“[Guidance Note 1] Where the Retailer who is not the Current Retailer <u>wishes to advise the DNSP that</u> 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>(i) The Retailer must send the DNSP an updated LifeSupportNotification and</p> <p>(ii) The DNSP may update their records accordingly.”</p>
Energy Queensland		4.6(a)	<p>It is recommended that clause 4.6(a) should be amended as follows:</p> <p>“Current Retailers can agree with any party <u>the DNSP</u> 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>

Participant Name	Old Clause No	New Clause No	Comments
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>
Energy Queensland		5.2 CustomerDetailsNotification Data (Table 6)	<p>The allowed value of “Life Support” under the SensitiveLoad field is now obsolete. It is recommended that a comment be included as follows:</p> <p>“Life Support <u>(obsolete, refer to LifeSupport Notification process 4.4.1)</u>”.</p>
Energy Queensland		5.2 CustomerDetailsNotification Data (Table 6)	<p>Energex and Ergon Energy recommend the following amendment to the definition/comments relating to SensitiveLoad:</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 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.”</p>

Participant Name	Old Clause No	New Clause No	Comments
Energy Queensland		5.7 BusinessAcceptance/Rejection (Table 11)	The reference to “Table 10” in Table 11 should be amended to read “Table 12”.