

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 – Second Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Tango Energy

Completion Date: 19 June 2018

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1. Customer and Site Details

Participant Name	Old Clause No	New Clause No	Comments
Tango Energy		General - Consultation/Process	<p>Tango Energy recognises the need for changes to Life Support processes in light of the NERR change and supports appropriate changes to procedures as a result.</p> <p>Tango Energy notes the following key points regarding the nature of development of a solution to meet the NERR requirements.</p> <p>It would appear the B2BWG and IEC have been uncertain in the development and determination of a solution. Tango notes the following:</p> <ul style="list-style-type: none">• Industry collectively put forward a preference for a holistic solution for Life Support which should include consideration of a 'central repository' for Life Support information.• The IEC determined an interim solution should be developed and requested AEMO and the B2BWG give due consideration to a longer term solution, including the viability of a central repository.• The IEC gave consideration to a full B2B solution and an e-mail based solution, determining the e-mail based solution was most appropriate as an interim measure. (It can be assumed a Prime Facie case was established based on this decision, as is required to commence a rules consultation on the B2B Procedures).• The IEC, based on a straw poll (voting limited to the B2B Working Group membership and those participants who had responded to the First Stage Consultation), decided to forgo the email solution and move to one of the original options presented prior to consultation which, it is assumed, did not meet the requirements for initial consultation.

Participant Name	Old Clause No	New Clause No	Comments
			<p>Tango questions the appropriateness of ‘voting’ on a solution rather than undertaking a review of benefits and impacts to all sectors of the market, ensuring the NEO and B2B Principles & Factors had been assessed against both options under consultation. Based on Section 7 of the Change Pack, Tango notes the IEC considers a Cost Benefit Statement ‘is not required as there is no optionality in regard to the requirement to meet the new obligations’. However, it is indeed important to consider the cost and benefit statement when assessing any number of options that could achieve the same regulatory requirement.</p> <p>Tango questions, for an interim solution, the incremental value of moving to a solution requiring all participants to:</p> <ul style="list-style-type: none"> ○ Undertake a full schema change; ○ Create a suite of new transactions; ○ Manage inbound CSDN transactions for the first time; <p>The B2B Change Pack seems to indicate this is a more efficient minimal change for Retailers given the availability of the LVI for the smaller retailer. Tango has provided further feedback to the use of the LVI later in this response and reiterates that full implementation and the use of the LVI involve significant system changes. The proposed solution is not minimal impact.</p> <p>Tango understands the key difference between the two solution options presented in this consultation was ‘security’ of customer data via e-mail, which we believe could be addressed simply in the e-mail solution.</p> <p>Tango considers the full B2B solution proposed to be overly onerous for an interim solution and that in the event of a holistic solution being agreed, most, if not all, of the changes to meet the B2B solution could become redundant.</p>

Participant Name	Old Clause No	New Clause No	Comments
Tango Energy		Small Retailer Engagement	<p>Participation in the B2BWG is limited to nominated members (although participants who are not members of the B2BWG can attend meetings, however they can have no input to the discussions or influence working group outcomes) and as such the consultation response is the only avenue available for 'small' retailer feedback. Although Tango Energy has engaged via the consultation process it is recognised a significant number of 'small' retailers are not engaged in the consultation process. Some of these small retailers may not be engaged because they supported an interim e-mail solution. This has the potential to create an unbalanced outcome where the views of a significant number of participants are not taken into consideration.</p> <p>The voting framework for this consultation, as noted previously, was particularly prohibitive. Those canvassed were only the B2BWG and Consultation respondents. Other participants who potentially agreed with the e-mail solution (thus did not provide a consultation response) did not get to 'vote'. Additionally those non-respondents may not closely monitor the consultation, on the understanding that any modifications to an e-mail solution would be manageable.</p> <p>Tango requests the IEC review its engagement model for smaller market participants and the Terms of Reference of the B2BWG, for this consultation and future consultations, to ensure solution options are considerate of all sectors of the market.</p> <p>It would be beneficial for industry to be capable of developing market solutions that are scalable to allow small players and market entrants to meet regulatory requirements, thus promoting and catering to a fully competitive market. Should market solutions be unnecessarily complex, this can be prohibitive for smaller market participants.</p>

Participant Name	Old Clause No	New Clause No	Comments
Tango Energy		LVI	<p>Tango Energy notes the feedback in the Change Pack that the smaller participants will be able to manage these transactions via the Low Volume Interface (LVI).</p> <p>Tango Energy disagrees that this is a minimal impact solution for Small retailers as the LVI will not be able to separate life support transactions from any other inbound transactions to our systems. Wholesale system changes are still required.</p> <p>AEMO systems provide a (-1) schema transformation which allows participants to take up schema change in a more flexible manner; however where there is an entirely new transaction, schema transformation becomes redundant. In this case the new schema transactions will be received via the participants inbox/outbox and thus we <u>must</u> upgrade our systems to manage these transactions. The LVI only provides limited functionality for manual generation/viewing of the transactions. Tango does not believe the solution design and consultation process took into consideration the direct impact on the PoC Transition Tool.</p> <p>With a view to providing significant benefit to small participants, Tango Energy request the IEC and AEMO review the LVI in line with feedback provided on the previous item on small participant engagement. Additionally, the review should include features of the LVI in line with this consultation feedback and those items documented as part of the PoC LVI workshop.</p>
Tango Energy		General – Life Support Equipment (Section 5.2)	<p>Transactional Data Section 5.2</p> <p>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>

Participant Name	Old Clause No	New Clause No	Comments
			<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><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>

Participant Name	Old Clause No	New Clause No	Comments
			<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> <p><i>(i) the date when the customer requires supply of energy at the premises for the purposes of the life support equipment;</i></p> <p><i>(ii) when medical confirmation was received from the customer in respect of the premises;</i></p> <p><i>(iii) the date when the premises is deregistered and the reason for deregistration; and</i></p> <p><i>(iv) a record of communications with the customer required by rules 124A and 125.</i></p> <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 equipment 'installed' at the customer's premises, therefore distinguishing the type of life support equipment is not critical and the requirement should be removed.</p>
Tango Energy		General – Jurisdictional applicability	<p>Tango Energy understands the NERR does not apply in Victoria and as such applying this change Nationally under the B2B Procedures creates new obligations in the market, which is outside the remit of the IEC and the B2B Procedures.</p> <p>It is commonly understood that Jurisdictional documents take precedence over a Procedure <i>where a conflict</i> is found. However in this case there is no conflict, just additional obligations created by the B2B Procedures.</p>

Participant Name	Old Clause No	New Clause No	Comments
			Tango recommends making the transaction either 'optional' therefore it shall be used where the NERR provides the overarching obligation OR adding a clause/table that defines that the transaction is Not Required in Victoria.
Tango Energy		4.3.2 5.2	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.