



Information Exchange Committee
C/ - IEC Secretariat – AEMO Ltd

Level 22

530 Collins Street

Melbourne VIC 3000

Tel: (03) 9609 8000

Fax: (03) 9609 8080

B2B Procedures v3.3.1 and v3.6 Consultation

16 December 2020

Final Report

Improvements regarding Life Support, After-hours Service and Global Settlement.

B2B v3.3.1 and v3.6 Final Report

Date of Notice: 16 December 2020

This Notice of Publication of Final Stage of Rules Consultation (Notice) informs all Business-to-Business (B2B) Parties, relevant B2B Change Parties, AEMO and such other persons who identify themselves to the Information Exchange Committee (IEC) as interested in the B2B Procedures (Consulted Persons) that AEMO has concluded its Consultation on B2B Procedures on behalf of the IEC.

This consultation was conducted under clause 7.17.4 of the National Electricity Rules (NER) in accordance with NER 8.9.

The consultation process

The IEC developed the changes in the interests of improving existing B2B Procedures. These changes were recommended to the IEC by AEMO, Evoenergy and the Business-to-Business Working Group (B2B-WG), on behalf of industry.

The changes amend the:

- Customer and Site Details Notification Process (CSDN Process) to clarify various Life Support processes.
- Service Order Process (SO Process) to reflect EvoEnergy's change of service level for same day re-energisations.
- National Electricity Market (NEM) Retailer of Last Resort (RoLR) Processes Part B (NEM RoLR Processes) to reflect the implementation of Global Settlement.

Table 1 Summary of changes to the Procedures and Guide

Instrument	New/Amended	Effective date
CSDN Process	Amended (Procedure v3.6 changes)	10 November 2021
SO Process	Amended (Procedure v3.3.1 changes)	1 January 2021
Meter Data Process		
One Way Notification Process	Amended (version control only)	N/A
Technical Delivery Specification		
NEM RoLR Processes	Amended (Procedure v2.2 changes)	1 May 2022
B2B Guide	Amended (v1.6)	10 November 2021

The B2B Guide has been reformatted and updated to provide additional clarity to Life Support transaction usage, reflecting the changes as outlined in this Report. This version will be published on 10 November 2021.

The ongoing consultation on the Wholesale Demand Response Mechanism will result in changes to the B2B Guide, effective on 24 October 2021. This version of the B2B Guide is yet to be finalised. As such, a new version of the B2B Guide will need to be released to consolidate these versions.

These changes do not require AEMO B2B e-Hub system changes.

Table 2 Summary of consultation process

The following table summarizes the consultation process:

Process Stage	Date
Publication of Issues Paper	17 August 2020
Closing of submissions in response to Issues Paper	22 September 2020
Publication of Draft Report and Determination (Draft Report)	20 October 2020
Closing of submissions in response to Draft Report	4 November 2020
Publication of Final Report and Determination (Final Report)	16 December 2020
B2B Procedures v3.3.1 effective date	1 January 2021
B2B Procedures v3.6 effective date	10 November 2021
NEM RoLR Processes v2.2 effective date	1 May 2022

Changes between the Issues Paper and Draft Report

Five submissions were received in response to the Issues Paper, from:

- AGL.
- Endeavour Energy.
- Energy Queensland.
- Origin Energy.
- Red Energy and Lumo Energy.

The majority of responses were in favour of the changes as proposed in the Issues Paper.

The consultation version of the NEM RoLR Processes is now v2.2, as version 2.1 is currently being consulted on, as part of a Business-to-Market (B2M) consultation.

Changes between the Draft Report and Final Report

Three submissions were received in response to the Draft Report, from:

- Ergon Energy and Energex.
- Origin Energy.
- Red Energy and Lumo Energy.

The majority of respondents noted the changes.

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1. Background

This Final Report has been prepared to detail the changes to the B2B Procedures as well as the B2B Guide. These changes have been developed under the IEC’s power to manage the ongoing development of B2B Procedures, as contemplated by clause 7.17.7(a)(2) of the NER. These changes have been made under NER 7.17.4, in accordance with NER 8.9.

This Final Report also provides information considered by the IEC in determining whether a case exists for amending the B2B Procedures, namely:

- An issues statement (see section 1.1).
- A summary of changes to the B2B Procedures, including consideration of the B2B Principles (see sections 1.1 and 2.5).
- A consideration of the B2B factors (see sections 2.5-2.8).

The changes have been considered and recommended to the IEC by AEMO, Evoenergy and the Business-to-Business Working Group (B2B-WG), on behalf of industry.

The impacted Procedures are the:

- B2B Procedure: Customer and Site Details Notification Process (CSDN Process).
- B2B Procedure: Service Order Process (SO Process).
- B2B Procedure: NEM RoLR Processes Part B (NEM RoLR Processes).

The Procedures that will be updated in order to maintain consistent numbering are:

- B2B Procedure: Meter Data Process.
- B2B Procedure: One Way Notification Process.
- B2B Procedure: Technical Delivery Specification.

The changes will not require any AEMO system changes.

1.1 Issues statement and scope

The IEC developed the changes in this Final Report to improve the functionality of existing B2B transactions and to incorporate routine communication between electricity retail market participants into B2B transactions. These changes were recommended to the IEC by AEMO and the B2B-WG on behalf of industry.

The members of the B2B-WG are as follows:

Table 3 B2B-WG members by sector

Retail	Distribution	Metering
AGL	AusNet Services	IntelliHUB
Alinta Energy	Energy Queensland	PlusES
Origin Energy	Endeavour Energy	Vector AMS
Red Energy and Lumo Energy	SA Power Networks	Yurika
Simply Energy	TasNetworks	

In summary, the changes include amending the:

- SO Process (effective 1 January 2021) – to reflect EvoEnergy’s change of service level for same day re-energisations.
- CSDN Process (effective 10 November 2021) – to clarify various Life Support processes.
- NEM RoLR Process (effective 1 May 2022) – to reflect the implementation of Global Settlement.

The other Procedures have been updated for the purpose of version control, in terms of consistent numbering. The detailed amendments are shown in the change-marked technical documents, which are published with this Final Report.

The relevant effective dates are as follows:

Table 4 Effective dates of B2B Procedure changes

Procedures	V3.3.1 (effective 1 January 2021)	V3.4 (effective 1 October 2021)	V3.4.1 (effective 1 October 2021#)	V3.5 (effective 10 November 2021)	V3.6 (effective 10 November 2021*)	V2.2 (effective 1 May 2022)
CSDN Process	Amended (version control only)	Consultation completed 22 July 2020. Out of scope for this consultation.	Amended (consolidation of versions only)	Consultation completed 22 July 2020. Out of scope for this consultation.	Amended (Procedure changes)	N/A (NEM RoLR Processes are not numbered consistently with B2B Procedures)
SO Process	Amended (Procedure changes)		Amended (consolidation of versions only)		Amended (version control only)	
One Way Notification Process			Amended (consolidation of versions only)			
Technical Delivery Specification	Amended (version control only)		Amended (consolidation of versions only)			
Meter Data Process			Amended (consolidation of versions only)			
NEM RoLR Processes	N/A (NEM RoLR Processes are not numbered consistently with B2B Procedures)					Amended (Procedure changes)

V3.4.1 exists to consolidate v3.3.1 into v3.4. No changes other than version control changes were consulted on for v3.4.1.

* The effective date of 10 November 2021 for B2B Procedures v3.6 was selected, as it is the preference of most B2B-WG members and surveyed market participants. This date is also the effective date for B2B Procedures v3.5. B2B Procedures v3.6 will immediately supersede v3.5.

1.2 Consultation process

The consultation process was as follows:

Table 5 Consultation Process

Stage	Start Date	End Date
IEC publication of Notice of Consultation and Issues Paper	17 August 2020	
Participant provision of submissions to AEMO	17 August 2020	22 September 2020
Participant submissions due on Issues Paper	22 September 2020	
IEC consideration of submissions	22 September 2020	20 October 2020
IEC preparation of Draft Report, including change-marked procedures		
IEC publication of Draft Report	20 October 2020	
Participant provision of submissions to AEMO	20 October 2020	4 November 2020
Participant submissions due on Draft Report	4 November 2020	
IEC consideration of submissions	4 November 2020	16 December 2020
IEC preparation of Final Report, including change-marked procedures		
IEC publication of Final Report	16 December 2020	

2. B2B Changes

2.1 Customer and Site Details Notification Process – Life Support

The changes:

- Clarify existing processes and avoid the use of manual work to resolve exceptions.
- Will improve efficiency within the market and accuracy of data by encouraging consistency.
- Are to be implemented on 10 November 2021.

In response to the Issues Paper:

- AGL, Origin Energy, Endeavour Energy and Red and Lumo Energy broadly supported the proposed changes.
- Energy Queensland sought further clarity on the proposed changes, which has been provided in the CSDN and B2B Guide.

In response to the Draft Report:

- Red and Lumo Energy noted the changes.
- Energy Queensland noted that an update to clause 5.6 proposed in the Draft Report had not been fully reflected in the Procedures. There were no objections to this proposal in response to the Draft report, so this has since been rectified.

The IEC did not receive any objections to the changes outlined in the Draft Report. The IEC's conclusion is to make the changes as summarised in this Final Report and described in the CSDN Process.

2.1.1 Registration process owner

Issue summary and submissions

The CSDN Process is open to interpretation, which has resulted in different approaches by individual participants, specifically in respect of when participants should nominate themselves as the Registration Process Owner (RPO) within a Life Support Notification.

These different interpretations cause confusion, as the Notification Recipient is expecting the Initiator to nominate itself, in scenarios different to those envisaged by the Initiator. For example:

- Some Recipients expect the Initiator to nominate itself when the customer contacts the Initiator to register life support.
- Some Initiators will nominate themselves every time they complete the de-registration process.

Accordingly, the IEC clarified that the Initiator must only nominate itself as the RPO, if the customer has contacted it directly, to inform it of the relevant life support requirements.

Specifically, the following values are described in the RegistrationOwner field:

- 'Yes' must only be used when the Initiator has been contacted by the customer directly – with the Initiator to define the relevant scenarios in which contact is defined to have occurred – to inform it of the relevant life support requirements.
- 'No' must be used as outlined the updated CSDN Process.

In response to the Issues Paper:

- AGL provided an example of an additional Life Support scenario, in which only one party as between the Retailer and Distributor receives the Medical Certificate, but both initiate the Life Support process at the same time. Accordingly, AGL suggested the addition of a note to the field.
- Energy Queensland noted 'that this change contradicts the current business process for deregistration of life support'.

IEC assessment and conclusion

In the IEC's view:

- Any further suggested changes, such as AGL's, are outside of the scope of this consultation, so should be outworked as a separate Issue Change Form (ICF) by the respondent, as appropriate.
- This proposal does not require an aseXML schema change, but instead, each business would need to outwork the relevant processes beyond the requirements of the Procedures.

2.1.2 Reconciliation process

Issue summary and submissions

The purpose of reconciliation is to identify issues with the daily life support process, which can be addressed to maintain and improve confidence in respect of life support arrangements.

However, the CSDN Process is open to interpretation, as to when a National Metering Identifier (NMI) should be included in the reconciliation process.

These different interpretations cause confusion, where the scope of NMIs expected by the Recipient of the Notification for reconciliation is different to the Initiator. For example:

- Some Recipients expect NMIs where the Initiator is the current retailer.
- Some Initiators include NMIs where the Initiator is not the current retailer, but may intend to become the current retailer.

Accordingly, the IEC shall update the CSDN Process to clarify that a retailer should only include life support NMIs in the reconciliation process, where it is the current retailer.

In response to the Issues Paper, AGL suggested amending clause 4.7 to:

- Clarify that the Current Retailer is the FRMP, not the prospective retailer.
- Improve the construction of clause 4.7.

IEC assessment and conclusion

The CSDN Process has been amended, along the lines suggested by AGL.

2.1.3 Life Support De-registrations

Issue summary and submissions

The CSDN Process is open to interpretation as to when a life support de-registration Notification can be sent.

These different interpretations cause confusion, where the Recipient expects a Notification in different scenarios to the Initiator. For example:

- Some Recipients expect a Notification when the Initiator has completed the de-registration process.
- Some Initiators send Notifications prior to completion.

The IEC has amended the CSDN Process, to clarify that a Notification can only be sent when the de-registration process has been appropriately completed. This change significantly reduces the risk that a customer is removed from a participant's life support register due to poor B2B communications.

The process is outlined in the change-marked CSDN Process v3.6. The de-registration date will need to be either the current date, or a past date, not a future date, in order to avoid potential duplication of the Notification.

Further, the Initiator is not to be allowed to send a Notification prior to successfully completing the process. During the pre-consultation discussions, such a communication was determined to be unnecessary, given that another Notification would need to be sent when the process had been successfully completed, potentially causing confusion. If the customer were to confirm that life support is required as part of the de-registration process, the risk of confusion would be greater.

IEC assessment and conclusion

The IEC did not receive any non-supportive submissions in respect of de-registrations and will proceed to make the changes as outlined in the change-marked Procedures, with no further changes outside of this.

2.1.4 Life support requests

Issue summary and submissions

The meaning of the 'Confirm Life Support' value in the Reason field of the Life Support Request transaction is currently being interpreted differently by participants.

These different interpretations cause confusion, as the Recipient of the Request is taking different actions to those expected by the Initiator. For example:

- An Initiator may believe that a Reason means that the Recipient should provide a Life Support Notification with their current status of life support.
- Some Recipients flag life support on receipt of the Request, then send a Notification back to the Initiator of the Request.

The changes allow the Initiator to request the Recipient to send a Notification with their life support information:

- Without the Recipient investigating the status of life support with its customer.
- After the Recipient has investigated the status of life support with its customer.

The changes clarify that:

- The Recipient should not treat this transaction as a notification that there is life support at the premises.
- The value of 'Confirm Life Support' in the 'Reason' field is for the Initiator to request the Recipient to send a Notification with its life support information, without the Recipient having investigated the status of life support with its customer.
- 'Other' is a valid reason that can be used, which allows the Initiator to request the Recipient to send a Notification with its life support information, after the Recipient has investigated the status of life support with its customer. Although this is a valid scenario, the expected volume would be low, given that in most cases the Initiator could confirm the status of life support with the customer itself.

In response to the Issues Paper:

- AGL suggested an additional enumeration to the 'Reason' field – to 'Confirm Life Support Status with Customer'.
- Energy Queensland stated that it 'would appreciate further clarification on the usage of the 'Confirm Life Support' and whether it can be utilised to confirm other information other than Status e.g. Current phone number'.

IEC assessment and conclusion

The IEC's assessment and conclusion is that:

- The use of 'Other' with comments would achieve the same goal of notifying new Retailers of being the RPO upon churn. The IEC suggests AGL raises this as an ICF, if it wishes to make this change.
- To further clarify the meaning of 'Confirm Life Support', the clause has been updated to read "Confirm Life Support' means the Retailer or DNSP only requires the current life support status and associated information held by the recipient and does not require the recipient to confirm details from the customer.'

2.1.5 Explicit informed consent

Issue summary and submissions

The CSDN Process, in Table 9 – which outlines the data requirements for LifeSupportNotification – states that the Initiator must obtain 'Explicit Informed Consent' for the use of the email address in this transaction.

However, such use of the email address does not fall under the requirements in respect of 'explicit informed consent', as set out in Section 38 of the National Energy Retail Law (NERL).

Accordingly, the IEC has decided to change this section to require 'consent' only.

In this regard:

- AGL, Origin Energy and Red and Lumo Energy responded in favour of this change.

- Energy Queensland noted that ‘this change contradicts the current business process for deregistration of life support’ and ‘is likely to result in significant system changes’.
- Red and Lumo Energy suggested further clarity of wording to ensure ‘the email address is only to be used for the purpose of managing life support requirements for the site’.

IEC assessment and conclusion

The IEC assesses that:

- A B2B schema change is not required.
- The implementation of this change may result in system changes for some participants.
- Participants will need to outwork these processes beyond the Procedures.

Accordingly, the IEC’s conclusion is to implement Red and Lumo’s suggestion, by amending the Process to read as follows:

“Must be the email address of the person who is the contact for the management of Life Support requirements where the initiator has obtained Consent for the express use of the email address for this purpose. Not required when LifeSupportStatus is:

- *Deregistered - No Medical Confirmation*
- *Deregistered - Customer Advice*
- *Deregistered - No Customer Response*
- *None”*

2.2 Service Order Procedure – After-hours Service Levels

Issue summary and submissions

EvoEnergy, the Distribution Network Service Provider (DNSP) in the ACT, is moving towards a change of Service Level, by removing the option of after-hours re-energisations.

The effective date of this change is 1 January 2021. This date falls between versions 3.3 and 3.4 of the B2B Procedures. Accordingly, the IEC will introduce this change as version 3.3.1.

This change:

- Is a guidance note to ensure accuracy, rather than a formal Procedure related to any operation of B2B Communications.
- Has been reflected in Table 11 of the SO Process.
- Does not require any changes to the Procedures that apply to other DNSPs.
- Does not have an impact upon:
 - B2B communication processes in respect of same day re-energisation.
 - Re-energisations after a non-payment, or de-energisations.

In response to the Issues Paper:

- AGL and Energy Queensland (responding as Energex and Ergon Energy Network) noted the change.
- Red Energy and Lumo Energy stated that they ‘consider it a poor customer experience for DNSPs not to provide a same day, after hours re-energisation of customer’s supply’.

In response to the Draft Report:

- Red Energy and Lumo Energy queried whether After-hours Service Levels should be included in the B2B Guide as opposed to the B2B Procedures.

- There were no responses from other participants.

IEC assessment and conclusion

The IEC's assessment and conclusion is that:

- In this case, the SO Process reflects business practice, rather than determining it.
- The clauses as outlined in the Service Order Procedures v3.3.1 should be retained as they are.

This view is based on feedback provided in response to the Issues Paper, as well as the absence of objections received in response to the Draft Report.

Any further suggestions are outside the scope of this consultation. Such suggestions include Red and Lumo's proposal to include After-hours Service Levels in the B2B Guide. Such suggestions should be outworked as a separate ICF in the future, as appropriate. The relevant templates are available at <https://aemo.com.au/en/consultations/industry-forums-and-working-groups/list-of-industry-forums-and-working-groups/information-exchange-committee>.

2.3 NEM RoLR Processes Part B – Global Settlement

Issue summary and submissions

The National Electricity Amendment (Global Settlement and Market Reconciliation) Rule 2018 No. 14:

- Introduced 'global settlements' for connection points connected directly to networks of Local Network Service Providers (LNSPs).
- Retained 'settlements by difference' for connection points within Embedded Networks (ENs).

Consequently, the concept of Local Retailer (LR) is:

- Removed for all LNSP connection points.
- Retained for all connection points within ENs.

The NEM RoLR Processes Part A - MSATS Procedure: RoLR Procedures (NEM RoLR Processes Part A) was amended during the 2019 consultations.

As noted during these consultations, the NEM RoLR Processes Part B also needs to be amended, specifically to change references from 'LR' to 'ENLR' in Section 103.2(a)(ii) and Table 105 CSDN.

These changes:

- Are to be included in an updated NEM RoLR Process Part B v2.2.
- Are minor, but facilitate benefits for consumers in accordance with the Rule change.
- Coincide with the implementation of Global Settlement on 1 May 2022.

Global Settlement is not expected to prompt further procedure or system changes.

Origin Energy responded to the Issues Paper by noting:

- Some incorrect referencing in NEM RoLR Processes Part A.
- Meter Providers may have relationships with a 'RoLR-affected NMI' in several clauses and that ENLR should be included in row ROLR_010, ROLR_011, ROLR_012 and ROLR_026.

The IEC did not receive any feedback on the Draft Report in regard to the NEM RoLR changes.

IEC assessment and conclusion

The NEM RoLR Processes Part A is outside of the scope of this consultation, as they do not apply to the B2B system. Accordingly, the relevant request was referred to AEMO, to be considered for B2M consultation.

As suggested by Origin Energy, ‘MC, MP, MDP and any other relevant participants’ was included in clauses 104.5, 105.1(a) and Table 105-A.

The ENLR changes against child NMLs is related to an EN where the parent retailer has failed. The ENLR will receive the reports specified by Origin Energy, as reflected in Appendix 1.

2.4 B2B Principles

The IEC considers that the B2B Final Report supports each of the B2B Principles, as follows:

B2B Principle	Justification
B2B Procedures should provide a uniform approach to B2B Communications in participating jurisdictions.	The B2B Procedures, in terms of transactions, are not jurisdiction-specific, therefore do not create any jurisdictional differences.
B2B Procedures should detail operational and procedural matters and technical requirements that result in efficient, effective and reliable B2B Communications.	The B2B Procedures improve the communications and operational processes between participants through the development of consistent information exchange.
B2B Procedures should avoid unreasonable discrimination between B2B Parties.	The B2B Procedures do not introduce changes that would discriminate between B2B Parties, as the changes are either optional or apply equally across all parties.
B2B Procedures should protect the confidentiality of commercially sensitive information.	The B2B Procedures do not introduce changes that would compromise the confidentiality of commercially sensitive information.

2.5 B2B Factors

The IEC has determined that the B2B Factors have been achieved as follows:

B2B Factors	Justification
The reasonable costs of compliance by AEMO and B2B Parties with the B2B Procedures compared with the likely benefits from B2B Communications.	The changes will ensure continued compliance by AEMO and B2B Parties with the NER in addition to consistency between B2B Communications and business practices.
The likely impacts on innovation in and barriers to entry to the markets for services facilitated by advanced meters resulting from changing the existing B2B Procedures.	The B2B Procedures do not impose barriers to innovation or market entry. They allow participants to streamline their operations, better meet regulatory requirements and allow for all relevant information to be contained within the Communications structure to allow for more efficient processes.
The implementation timeframe reasonably necessary for AEMO and B2B Parties to implement systems or other changes required to be compliant with any change to existing B2B Procedures.	The changes do not require system changes to the B2B e-Hub. Accordingly, no AEMO implementation timeframe is required. From a business process perspective, the amendments only clarify existing B2B Procedures, reflect changed Rules or formalise existing ‘best practice’, so minimal implementation timeframes should be necessary in respect of the required changes.

2.6 Benefits

The changes support the B2B Factors in the following ways:

- CSDN Process – changes clarify existing obligations and enhance regulatory transparency, providing a uniform approach and detailing operational matters to improve efficiency.
- SO Process – changes formalise existing practice by market participants, improving market efficiency.
- NEM RoLR Process – changes to reflect the implementation of Global Settlement are driven by changes to the NER, ensuring compliance.

2.7 Costs

The changes will not require a schema change or changes to the Low Volume Interface.

Participants should be aware of the potential costs, as well as risks, associated with the changes, including:

- The costs and resources they require to implement the changes, as well as their ongoing operational cost and resources.
- Their ability to implement the changes on the signposted dates, considering other known or upcoming industry changes, as well as internal projects.

2.8 MSATS Procedures

AEMO has advised that the changes have been assessed as not impacting the Market Settlements and Transfers Solution (MSATS) Procedures.

3. B2B Proposal

The changes are detailed within the attached procedures published with this Final Report.

4. Glossary

This Final Report uses many terms that have meanings defined in NER. The NER meanings are adopted, unless otherwise specified.

Term	Definition
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
B2B	Business-to-Business
B2B-WG	Business-to-Business Working Group
CSDN	Customer and Site Details Notification
DNSP	Distribution Network Service Provider
DRSP	Demand Response Service Provider
EN	Embedded Network
GS	Global Settlement
ICF	Issue Change Form
IEC	Information Exchange Committee
LNSP	Local Network Service Provider
LR	Local Retailer
LS	Life Support
MSATS	Market Settlements and Transfers Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERL	National Energy Retail Law
NMI	National Metering Identifier
PMD	Provide Meter Data
SO	Service Order
Re-en	Re-energisation
RoLR	Retailer of Last Resort
WDR	Wholesale Demand Response

5. Summary of submissions in response to Draft Report

5.1 Customer and Site Details Process

Respondent Name	Old Clause No	New Clause No	Comments	IEC response
Energex and Ergon Energy Network	5.6		Ergon Energy and Energex note that the new section 5.6 of the Customer and Site Details Notification (CSDN) Process is expected to be rephrased to 'Confirm Life Support' means the Retailer or DNSP only requires the current life support status and associated information held by the recipient and does not require the recipient to confirm details from the customer. However, we advise that the change described in the Draft Report has not been implemented in the CSDN document.	The IEC notes the respondent's comment. The clause has been rephrased to: "Confirm Life Support' means the Retailer or DNSP only requires the current life support status and associated information held by the recipient and does not require the recipient to confirm details from the customer.'
Red Energy and Lumo Energy			No comment	The IEC notes Red and Lumo Energy's response.

5.2 Service Order Process

Participant Name	Old Clause No	New Clause No	Comments	IEC response
Red Energy and Lumo Energy	Table 11		<p>For the initial consultation, Red Energy and Lumo Energy suggested that this change would lead to poor customer outcomes. The response from the IEC was that it reflected business practice.</p> <p>We note that when the B2B Procedures were re-consulted on due to the change in metering contestability, all business practices were placed into the B2B Guide, with the B2B Procedures outlining the procedure and process, rather than industry practice in applying the procedures.</p> <p>As this proposed change is regarding information, which is standard business practice only, we query whether, based on the IEC's response, is this better placed for inclusion in the B2B Guide as opposed to the B2B Procedure?</p>	The IEC notes the respondent's comment. When Evoenergy's proposal was discussed by the B2B-WG and IEC before consultation, it was agreed that moving business processes from the Procedures to the Guide was outside the scope of this consultation. If a proponent provided an ICF to address this issue, it could be considered in a future consultation.

5.3 National Electricity Market Retailer of Last Resort Part B (NEM RoLR Part B)

Participant Name	Old Clause No	New Clause No	Comments	IEC response
Red Energy and Lumo Energy			No comment.	The IEC notes the respondent's comment.

5.4 Other Procedures & B2B guide

Document	Participant Name	Old Clause No	New Clause No	Comments	IEC response
N/A [General comment received via email].	Origin Energy	N/A		Origin Energy has no further feedback with regard to the B2B v3.3.1 and v3.6 consultation.	The IEC notes the respondent's comment.