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# B2B Procedures v3.3.1 and v3.6 Consultation

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**20 October 2020**

Draft Report

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

# B2B v3.3.1 and v3.6 Draft Report

Date of Notice: 20 October 2020

This Notice of Second 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 is conducting the second stage consultation (Second Stage Consultation) on B2B Procedures on behalf of the IEC.

This Second Stage Consultation is being conducted under clause 7.17.4 of the National Electricity Rules (NER), in accordance with the Rules consultation requirements detailed in rule 8.9 of the NER.

## Matters under consultation

The proposed changes are to 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 proposed changes to the Procedures and Guide**

Instrument	New/Amended
CSDN Process	Amended (Procedure v3.6 changes)
SO Process	Amended (Procedure v3.3.1 changes)
Meter Data Process	
One Way Notification Process	Amended (version control only)
Technical Delivery Specification	
NEM RoLR Processes	Amended (Procedure v2.2 changes)

## The consultation process

The IEC invites written submissions on these matters under consultation, including any alternative or additional proposals which you consider may better meet the objectives of this Second Stage Consultation, as well as the National Electricity Objective in section 7 of the National Electricity Law.

Submissions in response to this Notice should be sent by email by 5:00pm (AEST) on 4 November 2020 to [NEM.Retailprocedureconsultations@aemo.com.au](mailto:NEM.Retailprocedureconsultations@aemo.com.au). A response template has been provided on AEMO’s website. Please send any queries about this consultation to the same email address.

Submissions received after the closing date and time will not be valid. The IEC is not obliged to consider late submissions for this reason. Any late submission should explain the reason for lateness and the detriment to you if the IEC does not consider it.

Please identify any parts of your submission that you wish to remain confidential, explaining why. The IEC may still publish that information, if it does not consider it to be confidential, but will consult with you before doing so. Please note that material which is identified as confidential may be given less weight in the decision-making process than material which is published.

In your submission, you may request a meeting with the IEC to discuss the matters under consultation, stating why you consider a meeting is necessary or desirable. If appropriate, meetings may be held jointly with other Consulted Persons. The IEC will generally make details of matters discussed at a meeting available to other Consulted Persons and may publish them, subject to confidentiality restrictions.

**Table 2 Summary of consultation stages**

<b>Process Stage</b>	<b>Date</b>
<b>Publication of Issues Paper</b>	17 August 2020
<b>Closing date for submissions in response to the Issues Paper</b>	22 September 2020
<b>Publication of Draft Report and Determination (Draft Report)</b>	20 October 2020
<b>Closing date for submissions in response to the Draft Report</b>	4 November 2020
<b>Publication of Final Report and Determination (Final Report)</b>	16 December 2020

The IEC developed the proposed changes which are the subject of this determination, in the interests of improving existing B2B Procedures. These changes do not require AEMO B2B e-Hub system changes. These changes were recommended to the IEC by AEMO, Evoenergy and the Business-to-Business Working Group (B2B-WG), on behalf of industry.

## 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 and Lumo Energy.

The majority of responses were in favour of the proposed changes.

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

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# 1. Background

This Draft Report has been prepared to detail the proposed changes to the B2B Procedures, as well as the B2B Guide. These proposed 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. The information provided meets the requirements for changing the B2B Procedures, as detailed in sections 7.17.4 and 8.9 of the NER.

This Draft Report also provides information considered by the IEC in determining whether a prima facie 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 proposed changes have been considered and recommended by the IEC's Business-to-Business Working Group (B2B-WG) and AEMO.

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 proposed changes are not expected to result in any AEMO system changes.

## 1.1 Issues statement and scope

The IEC has developed the proposed changes in this Draft Report to improve the functionality of B2B transactions, as well as to incorporate routine communication between electricity retail market participants into B2B transactions. These proposed 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**

<b>Retailers</b>	<b>Distributors</b>	<b>Metering</b>
AGL	AusNet Services	IntelliHUB
Alinta Energy	Energy Queensland	PlusES
Origin Energy	Endeavour Energy	Metering Dynamics
Red Energy and Lumo Energy	SA Power Networks	Vector AMS
Simply Energy	TasNetworks	

In summary, the proposed changes are to amend the:

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

The other Procedures will be 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 Issues Paper.

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)
<b>CSDN Process</b>	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)
<b>SO Process</b>	Amended (Procedure changes)		Amended (consolidation of versions only)		Amended (version control only)	
<b>One Way Notification Process</b>			Amended (consolidation of versions only)			
<b>Technical Delivery Specification</b>	Amended (version control only)		Amended (consolidation of versions only)			
<b>Meter Data Process</b>			Amended (consolidation of versions only)			
<b>NEM RoLR Processes</b>	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 significant changes are being consulted on for v3.4.1.

\* The effective date of 10 November 2021 for B2B Procedures v3.6 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 plan

The proposed consultation plan is as follows:

**Table 5 Consultation Date Plan**

Stage	Start Date	End Date
<b>Publication of notice of consultation and Issues Paper</b>	17 August 2020	
<b>Participant submissions to be provided to AEMO</b>	17 August 2020	22 September 2020
<b>Closing date for submissions in response to the Issues Paper</b>	22 September 2020	
<b>IEC to consider all valid submissions and prepare the Draft Report and Determination (Draft Report), including change-marked procedures</b>	22 September 2020	20 October 2020
<b>Publication of Draft Report</b>	20 October 2020	
<b>Participant submissions to be provided to AEMO</b>	20 October 2020	4 November 2020
<b>Closing date for submissions in response to the Draft Report</b>	4 November 2020	
<b>IEC to consider all valid submissions and prepare the Final Report and Determination (Final Report), including change-marked procedures</b>	4 November 2020	16 December 2020
<b>Publication of Final Report</b>	16 December 2020	

# 2. Proposed B2B Changes

## 2.1 Customer and Site Details Notification Process – Life Support

The proposed changes:

- Aim to clarify existing processes and avoid the use of manual work to resolve exceptions.
- Expected to improve efficiency within the market and accuracy of data by encouraging consistency.
- Are proposed 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.

### 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 proposes to clarify 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 proposed 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 proposed to be clarified in the CSDN Process.

In this regard:

- 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 ICF by the respondent, as appropriate.
- This proposal does not require a 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 proposes to 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 proposed by AGL.

## 2.1.3 De-registrations

### **Issue summary and submissions**

The CSDN Process is open to interpretation, as to when a 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 proposes to amend 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 proposed process is outlined in the change-marked CSDN Process. 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 proposed 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.
- Proposes no further changes to the CSDN Process on this matter.

## 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 proposed 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 proposed 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.

Further:

- 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 proposes 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**

Although the implementation of this change may result in system changes for some participants, no B2B schema change is needed and it's up to each business to outwork these processes beyond the Procedures. Red and Lumo's suggestion will be implemented in the Process, which will 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 Explicit Informed 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 proposed change effective date is 1 January 2021. As this date falls between versions 3.3 and 3.4 of the B2B Procedures, the IEC proposes to 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 impact:
  - B2B communication processes in respect of same day re-energisation.
  - Re-energisations after a non-payment, or de-energisations.

In this regard:

- 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'.

### **IEC assessment and conclusion**

In this case, the SO Process reflects business practice, rather than determining it.

The IEC's assessment and conclusion is to leave the clauses as proposed, based on the feedback.

## 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 proposed to be included in an updated NEM RoLR Process Part B v2.2.
- Are minor, but facilitate benefits for consumers of 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.

In their feedback:

- Origin Energy highlighted some incorrect referencing in NEM RoLR Processes Part A.
- Origin Energy noted that 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.

### 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. This request will be referred to AEMO to be considered for B2M consultation.

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

The ENLR changes against child NMIs 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:

<b>B2B Factors</b>	<b>Justification</b>
The reasonable costs of compliance by AEMO and B2B Parties with the B2B Procedures compared with the likely benefits from B2B Communications.	The proposed 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 proposed 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 proposed 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

AEMO does not expect the proposed changes will require a schema change or changes to the Low Volume Interface.

Participants should consider the costs, as well as risks, associated with the proposed 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 proposed dates, considering other known or upcoming industry changes, as well as internal projects.

## 2.8 MSATS Procedures

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

# 3. B2B Proposal

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

# 4. Glossary

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

<b>Term</b>	<b>Definition</b>
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
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 Issues Paper

## 5.1 Customer and Site Details Process

Respondent Name	Old Clause No	New Clause No	Comments	IEC response
AGL		V3.6 – CI 4.5	AGL supports this change.	The IEC notes the respondent's support for this change.
Origin Energy	4.5(d)		Origin Energy support the amended wording as it provides clarification for participants on when the LifeSupportNotification for deregistration of life support must be sent.	The IEC notes the respondent's support for this change.
AGL		V3.6 – CI 4.6	<p>AGL supports this change.</p> <p>AGL notes that the DB only has an obligation to notify a new retailer on churn when they are the registered Process Owner (RPO). However, AGL notes that this change may leave a gap in the process where a DB may believe that Life Support exists at a premises, but the new Retailer has not registered Life Support.</p> <p>AGL recommends clarification be detailed within the guidelines around when an LSR of Confirm Life Support should be sent, which AGL believes should be in the following scenario:</p> <p>If a Retailer wins a site that is currently flagged with a DB from another Retailer the DB must send an LSR of Confirm Life Support to the winning Retailer so they can respond with an LSN of what is in their system. If the DB is not the RPO, and the new retailer has no Life Support Registration (determined by an LSN response of None) then the DB should initiate de-registration from their system. This will result in some sites still being registered (de-registration not yet completed) by the time of the next Quarterly reconciliation occurring. Further discussion is required on how DB's and Retailers are to handle the mismatch of these sites during the reconciliation.</p> <p>AGL notes that failing to do the above steps will result in sites remaining registered for life support after churn and ultimately resulting in DB's being required to send an LSN to the winning Retailer during the Quarterly Reconciliation process.</p>	<p>The IEC notes the respondent's support for this change.</p> <p>The IEC recommends the additional clarification be incorporated into an ICF as this recommendation is outside of the scope of this consultation.</p>

Respondent Name	Old Clause No	New Clause No	Comments	IEC response
Energex and Ergon Energy Network	4.6(g)		Energex and Ergon Energy Network would appreciate further clarification and examples on the acceptable uses of the LifeSupportRequest (where identified as the initiator), along with the expected responses and actions from a recipient of a LifeSupportRequest.	The IEC notes the respondent's comment. This clarification has been provided in the B2B Guide.
Origin Energy	-	4.6(g)	Origin Energy support the inclusion of this clause.	The IEC notes the respondent's support for this change.
AGL		V3.6 – CI 4.7	Suggest that for the second sentence that clarification is of FRMP status is included ' <u>... the DNSP for NMs where they are not the Current Retailer (FRMP).</u> '  Also, should there be a more generic statement in the B2B procedure (and Glossary) that the current retailer is the FRMP ?	The IEC notes the respondent's comment. The IEC clarified that prospective retailers are not FRMPs in the CSDN.
AGL		V3.6 – CI 4.7	Item 1 – The use of 'and' between (i) and (ii) may be incorrect as it implies both tests must be passed (ie current and future registration);  Item 2 – the common text can be incorporated into the main statement, leaving points (i) and (ii) to identify the specific criteria:  Reconciliation process by sending a with the DNSP for current and future registrations LifeSupportNotification with Reason of 'Reconciliation' to the respective DNSP for NMs where they are the Current Retailer and they have:  (i) <del>The Life Support Reconciliation process must use the LifeSupportNotification with Reason of 'Reconciliation': the Current Retailer and they have a current life support registration; and</del> or (ii) <del>the Current Retailer and they have a future life support registration</del>  (e) The Retailer must not send a LifeSupportNotification with Reason of 'Reconciliation' to the DNSP for NMs where they are not the Current Retailer.  ie:  respective DNSP for NMs where they are the Current Retailer and they have:  (i) a current life support registration; <del>and</del> or (ii) a future life support registration	The IEC has revised the section, along the lines suggested by the respondent.

Respondent Name	Old Clause No	New Clause No	Comments	IEC response
AGL		V3.6 – CI 5.5 Registration Owner	<p>AGL notes that there are cases where both the Retailer and DB may initiate the Life Support process at the same time, but only one receives the Medical Certificate (often the Retailer because of the Concession form).</p> <p>This has led to DBs seeking deregistration (due to no confirmation) at the same time as RBs are seeking to Register with Medical Confirmation.</p> <p>AGL believes that where both parties have been contacted by the customer, the party who receives the medical forms should become the nominated RPO for that customer.</p> <p>This can be defined as the party who sends the LSN as one of Registered – Medical Confirmation.</p> <p>An additional Note could be added to this field:</p> <p><a href="#">If both parties initiate the Life Support process, then the one who receives the medical confirmation (and sends an LSN with a status of 'Registered - Medical Confirmation' will be deemed to be the RPO for that site, and the other party should accept this RPO status.</a></p>	The IEC notes the respondent's comment. This note should be outworked as a separate ICF if the respondent wishes to progress it.
Origin Energy	4.7(e)		Origin Energy support the amended wording to this section as it provides further clarification on the life support reconciliation process.	The IEC notes the respondent's support for this change.
AGL		V3.6 – CI 5.5 DateRequired	AGL supports this change.	The IEC notes the respondent's support for this change.
AGL		V3.6 – CI 5.5 LSContactEmailAddress	AGL supports this change.	The IEC notes the respondent's support for this change.
Energex and Ergon Energy Network	5.5 – Table 9		Energex and Ergon Energy Network note that this change contradicts the current business process for deregistration of life support. Energex and Ergon Energy Network currently take ownership of retailer owned registrations by using the value of YES on the LifeSupportNotification. The implementation for this change is likely to result in significant system changes.	The IEC notes the respondent's comment. These changes will not result in a B2B schema change. It's up to each business to outwork these processes beyond the Procedures.

Respondent Name	Old Clause No	New Clause No	Comments	IEC response
Red Energy and Lumo Energy	5.5 – Table 9	Must be the email address of the person who is the contact for the management of Life Support requirements where the initiator has obtained Explicit Informed Consent for the <b>express</b> use of the email address <b>for this purpose</b> . Not required when LifeSupportStatus is: • Deregistered - No Medical Confirmation • Deregistered - Customer Advice • Deregistered - No Customer Response • None	Agree in principle with removal of EIC to replace with consent. Given this may not be the retailer's customer, but rather the party who retailers and distributors contact for LS reasons, Red and Lumo recommend adding in additional wording to clarify that the email address is only to be used for the purpose of managing life support requirements for the site.	The IEC notes the respondent's support for this change. This clause has been updated accordingly.
Origin Energy	5.5		Origin Energy support the additional wording to the DateRequired field in the LifeSupportNotification Data.	The IEC notes the respondent's support for this change.
AGL		V3.6 – CI 5.6 Reason	<p>AGL Supports this change.</p> <p>AGL notes that the DB only has an obligation to notify a new retailer on churn when they are the registered Process Owner (RPO). However, AGL notes that this change may leave a gap in the process where a DB may believe that Life Support exists at a premises, but the new Retailer has not registered Life Support.</p> <p>AGL notes that Other could be used if the RB is required to contact the customer to confirm life support requirements, but suggests a more preferable mechanism would be to add another enumeration to meet this concern:</p> <p><a href="#">Confirm Life Support Status with Customer</a></p>	The IEC notes the respondent's support for this change. The use of 'Other' with comments would achieve the same goal. The IEC suggests the respondent raise this as an ICF in order to make this change.

Respondent Name	Old Clause No	New Clause No	Comments	IEC response
Energex and Ergon Energy Network	5.6		Energex and Ergon Energy Network 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.	The IEC notes the respondent's comment. Clause will be rephrased to: "Confirm Life Support" means the Retailer or DNSP only requires the current life support status <b>and associated</b> information held by the recipient and does not require the recipient to confirm details from the customer.'
Origin Energy	5.6		Origin Energy support the additional wording to this section as it provides further clarification on the use of the LifeSupportRequest.	The IEC notes the respondent's support for this change.
Endeavour Energy			We support all the changes related to life support	The IEC notes the respondent's support for this change.

## 5.2 Service Order Process

Participant Name	Old Clause No	New Clause No	Comments	IEC response
AGL	V3.3.1 – Table 11		Noted	The IEC notes the respondent's comment.
Red Energy and Lumo Energy	Table 11		Red Energy and Lumo Energy consider it a poor customer experience for DNSPs not to provide a same day, after hours re-energisation of customer's supply. We object to any customer being left off supply (in the unlikely event) that they are moving into a property without power and have not organised it beforehand. DNSPs have the ability to be compensated for the works undertaken and should offer this to customers. Note: this applies to all DNSPs, not just ACT (Evoenergy).	The IEC notes the respondent's comment. As it is the role of the Process to reflect the reality of business practices, not to pre-determine it, the IEC is unable to make changes to participant business processes.
Energex and Ergon Energy Network	All		Energex and Ergon Energy Network provide no comment.	The IEC notes the respondent's comment.

### 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
Origin Energy	11.2(h)(v)		This section refers to Table 10-A, 10-B, 10-C 10-D however only Table 10-A is represented in these procedures. Suggested amendment:  (v) Send out COM (Completed) Change Request Notifications in accordance with the NER in Table 10-A, <del>Table 10-B, Table 10-C, and Table 10-D</del>	The IEC notes the respondent's comment. The NEM RoLR Process Part A is outside of the scope of this consultation as it does not apply to the B2B system. This request will be referred to AEMO to be progressed to a B2M consultation.
Origin Energy	11.2(k)		This section refers to section 11.2(k) and 11.2(l) however 11.2(l) is not in these procedures. Suggested amendment:  (k) Compliance with sections 11.2(k) <del>and 11.2(l)</del> is not required if there are further updates to do in MSATS.	Please see previous response to Origin Energy
Origin Energy	Table 13-A & 13-B		Origin Energy seek clarification as to whether notifications should also be sent to the ENLR?	Please see previous response to Origin Energy
Origin Energy	13.3(g)		Origin Energy seek clarification as to whether ENLR should be included in this section.	Please see previous response to Origin Energy
Origin Energy	13.3 (h)(ii) & (iv)		Origin Energy seek clarification as to whether ENLR should be included in these sections?	Please see previous response to Origin Energy
Origin Energy	13.3(h)(v)		This section refers to Table 13-A, 13-B, 13-C 13-D however only Table 13-A and 13-B are represented in these procedures. Suggested amendment:  (v) Send out COM (Completed) Change Request Notifications in accordance with the NER in Table 13-A and Table 13-B, <del>Table 13-C, and Table 13-D.</del>	Please see previous response to Origin Energy
Origin Energy	13.3(k)		This section refers to section 13.3(m) however there is no section 13.3(m) in these procedures. Suggested amendment:  (k) Once all the updates required to satisfy the obligations imposed by sections 11, 12 and 13 are completed, send an email notification containing the information <del>specified in section 13.3(m)</del> to all RoLR Key Contacts.	Please see previous response to Origin Energy
AGL	CI 103		Noted	The IEC notes the respondent's comment.

Participant Name	Old Clause No	New Clause No	Comments	IEC response
Origin Energy	104.5		The suspended Retailer may have also sent service orders to a Meter Provider that were yet to be finalised. Should this section be updated to include Meter Provider in addition to LNSP?	The IEC notes the respondent's comment. The IEC will add the 'MC, MP and MDP and any other relevant participants' to that clause. The IEC notes the B2B RoLR processes may need further development to cope with in-flight processes.
AGL	Table 105		Noted	The IEC notes the respondent's comment.
Origin Energy	105.1(a)		A Meter Provider may also have a relationship with a RoLR affected NMI. Origin Energy seeks clarification if they should they be included in this section?	The IEC notes the respondent's comment. The IEC will add the 'MC, MP and MDP and any other relevant participants' to that clause.
Origin Energy	105.3(a)		Minor amendment required to change Table 105 to 105-A.	The IEC notes the respondent's comment. The table has been renamed accordingly.
Origin Energy	Table 105-A		Origin Energy seek clarification on whether the Meter Provider also needs to be a party to reconcile against as well as a reconciling party?	The IEC notes the respondent's comment. The IEC will add the 'MC, MP and MDP and any other relevant participants' to that clause.
Origin Energy	Appendix 1		Origin Energy seek clarification as to whether the Meter Provider should be included in row ROLR_003, ROLR_009 and ROLR_022?	The IEC notes the respondent's comment. There are MP reports ROLR_006 and ROLR_012 that suit this purpose.
Origin Energy	Appendix 1		Origin Energy seek clarification as to whether the ENLR should be included in row ROLR_010, ROLR_011, ROLR_012 and ROLR_026?	The IEC notes the respondent's comment. The ENLR changes against child NMIs is related to an EN where the parent retailer has failed. The ENLR will receive the reports.
Energex and Ergon Energy Network	All		Energex and Ergon Energy Network provide no comment.	The IEC notes the respondent's comment.
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
B2B Guide	Energex and Ergon Energy Network	All		Energex and Ergon Energy Network provide no comment.	The IEC notes the respondent's comment.