

11 April 2022



Mr Daniel Westerman  
Chief Executive Officer  
Australian Energy Market Operator  
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MELBOURNE VIC 3001

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Dear Mr Westerman

### **B2B Procedures v3.8 Consultation**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the *B2B Procedures v3.8 Consultation*.

Energy Queensland provides responses to questions raised by AEMO in the attached Consultation Participant Response Template.

This submission is provided by Energy Queensland, on behalf of its related entities, specifically, distribution network service providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy), and affiliated contestable business, Yurika Pty Ltd including Yurika Metering.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact Laura Males on 0429 954 346 or myself on 0438 021 254.

Yours sincerely

A handwritten signature in black ink that reads "C. G. Martin".

Charmain Martin  
**Acting Manager Regulation**

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**Encl:** Energy Queensland comments to the Consultation Participant Response Template.

## B2B Procedures

- Customer and Site Details (version change)
- Service Order (procedure changes)
- Meter Data (version change)
- One Way Notification (procedure changes)
- Technical Delivery Specification (procedure changes)
- B2B Guide (document changes)

## CONSULTATION – First Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:***

*Yurika Metering (MDYMC, MDYMP, MDYMDP, MDYENM)  
Ergon Energy Network, Energex*

***Completion Date:*** 11/04/2022

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## 1. Issues Paper Questions

Topic	Question	Comments
2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders	Question 1: What is your preferred solution, Option 1a or Option 1b, and why?	Energy Queensland’s preferred solution is Option 1a. As the Notified Party (NP) transaction is already used the changes required are believed to be simple and able to be incorporated into current continuous improvement system works. We also consider there would be fewer impacts and work required to adopt Option 1a as opposed to Option 1b across the industry more broadly.
2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders	Question 2: Have you already implemented one of the proposed options? What would be your expected incremental costs to deliver each of the proposed solutions? This should not include costs already spent.	<p>Within Energy Queensland, entities have commenced preliminary scoping works around the development of a solution using NP logic but have not as yet implemented any system or process changes to adopt this solution. Costs to fully develop and implement a NP solution are believed to be minor and works required could be aligned with current system works to minimise business impacts and costs. Additional work will be required to allow potential actual costs to implement this solution to be determined.</p> <p>Energy Queensland entities have not undertaken any exploratory works around the implementation of a Two Service Order (SO) solution and therefore do not have any indicative costing details available. As a Two SO approach has not been considered/used previously, work to understand and develop this solution would be greater than adapting changes to the existing NP processes.</p>

Topic	Question	Comments
2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders	Question 3: These proposed solutions will not provide 100% coverage for every service order requested. Do you believe that Option 1a or Option 1b provides better protection for customers? To what extent do you believe that your chosen option better protects customers?	Energy Queensland believes Option 1a will provide the better protection to customers. Under Option 1a Re-energise(Re-en)/De-energise (De-en) requests and NP transactions will be sent to/received by parties (Local Network Service Providers (LNSP) and Metering Coordinator (MC)/Metering Providers (MP)) at the same time, as the NP transaction is generated and sent at the same time as the Re-en/De-en SO. Under Option 1b where two separate SOs will be generated there may be the potential for delays in timing between generation (and receipt) of the individual transactions. We feel the greatest risk to a customer being left off-supply is due to a potential delay between participants becoming aware of the Re-en/De-en requests and the resulting delays in actioning the requests. Whilst the difference in effectiveness of the two options proposed is believed to be minor our belief is that Option 1a will give the greater customer protections.
2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders	Question 4: What is the extent of the customer impact for each of the proposed solution? How long will a customer be without supply when each proposed solution does not provide coverage (that is, how long does it take to rectify the negative impact to the customer)?	Energy Queensland is unable to provide any insights to this scenario.
2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders	Question 5: Assuming that Option 1a or Option 1b is to be implemented by May 2023, do you see any substantial or significant issues which would delay this implementation? If so, what are they?	No, Energy Queensland does not identify any substantial issues that would delay implementation.

Topic	Question	Comments
2.3 Shared Fuse Notification using One Way Notification (OWN)	Question 6: Do you support the proposed changes with regards to Shared Fuse Notification using the aseXML OWN? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)	Yes, Energy Queensland supports these proposed changes.
2.3 Shared Fuse Notification using One Way Notification (OWN)	Question 7: If the changes proposed were to be adopted, would your organisation have any issues in implementing the changes by May 2023?	No, Energy Queensland has not identified any issues with the proposed implementation date.
2.9 Questions on proposed changes	Question 8: Do you have any other suggestions, comments or questions regarding this consultation? If you have any comments outside of the scope of this consultation, please reach out to your relevant B2B-WG representatives.	Energy Queensland provides no further comments.

## 2. Service Order Process – Option 1a

Old Clause No	New Clause No	Comments
		Energy Queensland provides no comment.

## 3. Service Order Process – Option 1b

Old Clause No	New Clause No	Comments
		Energy Queensland provides no comment.

## 4. One Way Notification

Old Clause No	New Clause No	Comments
	4.6.2	While Energy Queensland agrees it will in most circumstances be the MP who initiates this transaction, this differs to the final determination for the MCPI Rule Change which places the obligation on either the MC or Retailer. We believe clarification is required to cover where the MP is not also the MC for consistency (our understanding is that the MP is not actually obligated unless they are also the MC), although in our view, it is logical for the MP to be the initiator of this transaction.

Old Clause No	New Clause No	Comments
	4.6.2	Energy Queensland notes the use of 'DNSP' where the final determination for the MCPI Rule Change refers to 'LNSP', the subtle difference being that an LNSP can be an ENM or TNSP. We feel this reference should be changed to DNSP to match other documents.

## 5. Technical Delivery Specification

Old Clause No	New Clause No	Comments
		Energy Queensland provides no comment.

## 6. B2B Guide – Option 1a

Old Clause No	New Clause No	Comments
	6.7.2	Energy Queensland notes SharedFuseInd, and queries why the values are inconsistent with the enumerated values in the CRs? We suggest these should be 'Y', 'I' and 'N', rather than 'S'.



Old Clause No	New Clause No	Comments
	6.7.3	Energy Queensland suggests the requirements in the 'email template' are incorrect. We suggest the email requirements should be as follows, 'Sender: (Individual or group e-mail of the sender)' and 'Recipient: (e-mail nominated by DNSP)'.
	7.3.6.1	Energy Queensland believes the B2B Guide in the consultation pack incorrectly describes a format for the interim .CSV file. Our understanding is that the interim CSV file would capture the following: 'NMI' – 10 characters no check digit, 'MC' – MC Participant Id, MPB' – MPB Participant Id, 'DNSP' – DNSP Participant Id, 'Shared Fuse Status' – Y, I, or N and 'Date' – date SF status identified.

## 7. B2B Guide – Option 1b

Old Clause No	New Clause No	Comments
		As per comments provided in pervious responses.