



Information Exchange Committee
C/ - IEC Secretariat – AEMO Ltd

Level 22

530 Collins Street

Melbourne VIC 3000

Tel: (03) 9609 8000

Fax: (03) 9609 8080

NEM **Retailer of Last Resort (RoLR)** Processes Part B v2.4 Consultation

18 September 2023

Final Report

Improvements to the Business to Business (B2B) RoLR Procedure

B2B RoLR Procedure v2.4 Final Report

Date of Notice: 18 September 2023

This Notice of Final Stage of Rules Consultation (Notice) informs all Business-to-Business (B2B) Parties, relevant B2B Change Parties, AEMO and other interested persons (Consulted Persons) that the Information Exchange Committee (IEC) has concluded its consultation (Consultation) on the changes to the RoLR B2B Procedure which were proposed (Proposal) in respect of coincident service orders and shared fuse notification.

This Consultation was 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.

The consultation process

The IEC developed the Changes in the interests of improving the B2B Procedure. The Changes do not require AEMO B2B e-Hub system changes. However, some of the participants may require system changes. The Changes were recommended to the IEC by the members of the Business-to-Business Working Group (B2B-WG).

The IEC received written submissions on the Proposal, including any alternative or additional proposals, as well as the national electricity objective in section 7 of the National Electricity Law.

Table 1 Summary of consultation stages

Process Stage	Date
Publication of Draft Report (Expedited Consultation)	2 March 2023
Closing date for submissions in response to Draft Report	31 March 2023
Publication of Second Stage Draft Report and Determination (Second Draft Report)	9 June 2023
Closing date for submissions in response to Second Draft Report	10 July 2023
Publication of Final Report and Determination (Final Report)	18 Sep 2023
NEM RoLR Procedure Effective Date	1 Nov 2023

Executive Summary

The Changes are intended to:

- Enhance the information provided to the RoLR to enable the RoLR to service the customers of the failed original retailer.
- Reduce the impact caused by the failure of the original retailer more efficiently.
- Correct the in-text referencing errors in the RoLR Processes.
- Correct some errors more broadly in certain subclauses of the RoLR Processes.

The key issues arising in the submissions to the Second Draft Report were as follows:

- No material issues were identified.
- All respondents acknowledged the gaps that exist in the current RoLR Processes.
- Some respondents provided feedback that was in addition to the scope of the original proposal.
- Some respondents preferred the newly added fields provided by the suspended retailer to be made 'optional' or 'required', instead of 'mandatory'.
- Some respondents did not support the addition of some of the new data fields from the suspended retailer, because that information might already be available in MSATS.
- The majority of the feedback was related to editorial changes, in-text references, and changes to improve the clarity of clauses.

After consideration of the submissions and on the advice of the B2BWG, the IEC has:

- Made the necessary editorial and clarificatory changes.
- Addressed the manifest errors by fixing the incorrect links and references to ensure accuracy and clarity.
- Created a suspended retailer specific RoLR report (Suspended Retailer Report) that includes enhancements to the RoLR B2B Customer Details report. The Suspended Retailer Report is required to be provided by the suspended retailer to the RoLR under the RoLR Processes.
- Reviewed the need for mandatory versus optional fields and made appropriate changes.

The treatment of inflight Service Order Requests to a non-LNSP service provider was descoped from the Consultation. However, the IEC acknowledges the need for further consideration within the broader context of the AEMO review of the NEM RoLR Processes Part A – MSATS Procedure: RoLR Procedures.

Table 2 Summary of Proposal

Instrument	New/Amended
NEM RoLR Processes Part B – B2B Procedure	Amended v2.4

Changes between the Second Draft Report and Final Report

In response to the Second Draft Report, the IEC received seven submissions, from:

- AGL
- CitiPower Powercor
- Endeavour Energy
- TasNetworks
- PLUS ES
- Red and Lumo
- United Energy

In response to the submissions, in the Final Report:

- Some of the newly-added fields including email address, hardship indicator, customer classification, solar flag and billing related fields have been made 'required', instead of the originally- proposed 'mandatory'.
- The following two separate tables have been created out of Table 102
 - Table 102-A Suspended Retailer's Customer and Site Details to Provide to RoLR
 - This Suspended Retailer Report includes all the newly added fields and amendments.
 - Table 102-B Distributor's/LNSP's Customer and Site Details to Provide to RoLR
 - The current table 102 remains unchanged, , except to correct the relevant errors as per distributor feedback.

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1. Background

This Final Report summarises the Changes. The Changes have been developed under the IEC's power to:

- Manage the ongoing development of the B2B Procedures under NER 7.17.7(a)(2).
- Make changes to the B2B Procedures under NER 7.17.4.

This Final Report also provides information considered by the IEC in determining whether to make the Changes to the B2B Procedures, namely:

- An issues statement in respect of the Proposal (see section 1.1).
- A summary of the Changes, including consideration of the B2B Principles (see sections 1.1 and 2.5).
- A consideration of the B2B factors (see section 2.6).

1.1 Issues statement and scope

The IEC developed the Changes to improve the functionality of B2B transactions, as well as to incorporate routine communication between electricity retail market participants into B2B transactions. The Changes were recommended to the IEC by the members of the B2B-WG.

The members of the B2B-WG are as follows:

Table 3 B2B-WG members by sector

Retailers	Distributors	Metering
AGL	AusNet Services	IntelliHUB
Alinta Energy	Energy Queensland	PLUS ES
Origin Energy	Essential Energy	Yurika
Red Energy and Lumo Energy	SA Power Networks	Vector Metering
EnergyAustralia	TasNetworks	

The relevant effective date is as follows:

Table 4 Change effective date

Procedures	V2.4 (effective 1 November 2023)
NEM RoLR Processes Part B – B2B Procedure	Amended (Procedure changes)

1.2 Consultation plan

The consultation plan was:

Table 5 Consultation Date Plan

Stage	Start Date	End Date
Publication of Notice of Expedited Consultation and Draft Report	2 March 2023	
Participant submissions provided to AEMO	2 March 2023	31 March 2023
Closing date for submissions in response to Draft Report	31 March 2023	
IEC consideration of all valid submissions and preparation of Second Draft Report, including change-marked Procedures	31 March 2023	8 Jun 2023
Publication of Second Draft Report	9 June 2023	
Participant submissions provided to AEMO	9 June 2023	10 July 2023
Closing date for submissions in response to Second Draft Report	10 July 2023	
IEC consideration of all valid submissions and preparation of Final Report, including change-marked Procedures	10 July 2023	17 September 2023
Publication of Final Report	18 September 2023	

2. Changes

2.1 Suspended Retailer Report

Background

The energy markets have experienced multiple RoLR events since May 2022. Given the ongoing challenges of price volatility and other factors contributing to cost pressures, further RoLR events may occur.

The B2B Procedure governs the sharing of information during a RoLR event, including one critical report used to provide crucial customer related information to the RoLR. Table 102A describes the information requirements to be provided by the suspended retailer to the RoLR, so that the RoLR can enable account creation for the transferred customers.

The B2B-WG identified several issues in the current report format described in Table 102A:

- Key fields that are vital for the RoLR to set up the customer account and provide effective service to the customer, such as hardship indicators and life support status, are missing. This omission could lead to a potential risk of non-compliance for the RoLR.
- Some of required fields included in Table 102A, including Date of Birth, are not mandatory, which should be addressed to ensure completeness of customer information.
- Certain fields in Table 102A which refer to information in the 'CSDN Procedure' are no longer relevant, since the CSDN procedure was revised in 2017.

During recent RoLR events, RoLRs had to obtain the necessary customer information for account creation either from the suspended retailer's administrators, the distributor, or the energy regulators (the AER, the ESCV) by special request. This highlighted the fact that the current version of Table 102 does not adequately support all the information required to appropriately serve the customer transferred to the RoLR.

Issue summary and submissions

All respondents recognised the gaps in Table 102A.

Specifically:

- The majority of respondents supported the need to enhance Table 102A.
- PLUS ES recommended updating the usage of ADL field without any condition, thereby mirroring what is provided in MSATS.
- TasNetworks suggested deleting the reference to unstructured addresses, and directly populating any referenced information into the respective PostalUnstructuredAddress fields.
- AGL suggested retaining the existing fields of RebateCode and PensionHealthCardNumber as they are, to ensure these files are aligned with gas RoLR reports to the extent possible. AGL also suggested reorganising the fields, formats, and the sequence of the newly added fields, for better logical flow.
- Red Energy/Lumo Energy did not support including some of the proposed fields that already exist in MSATS. Instead, they suggested making some of the newly added fields 'R' *required* instead of 'M' *mandatory*.
- Red/Lumo also suggested an addition of the *RegistrationOwner* for Life Support, to prevent the RoLR from incorrectly asking the customer for medical confirmation which has already been provided to the LNSP.

2.2 In-text referencing corrections and clarifications

Issue summary and submissions

Version 2.3 of the B2B Procedure includes in-text referencing which requires correction and clarification.

All submissions agreed to the Changes to clauses 102 to 105, as follows:

- PLUS ES recommended amending Table 102A, as well as the references to clause 8.3(c) and 8.3(d) in clause 102.4(b), given clause 8.3 does not exist in the B2B Procedure.
- PLUS ES also recommended amending clause 104.4(e) to clarify whether clause 104.4(e) applies to service orders other than de-energisation.
- TasNetworks suggested the reference to clause 104.4(g)(ii) be replaced by a reference to clause 104.4(f), given clause 104.4(f) is the clause which refers to the list being provided to the RoLR.

2.3 IEC Assessment and Conclusion

2.3.1 Suspended Retailer Report

After consideration of the submissions and on advice of the B2BWG, the IEC has made the Changes to Table 102A to.

- Retain the existing fields of RebateCode and PensionHealthCardNumber.
- Reorganise the sequence of the newly-added fields for better logical flow.
- Designate the fields CustomerClassification, Solar, HardshipIndicator and Battery/EV to be 'required' instead of 'mandatory'.
- Remove the conditional usage from Average Daily Load.
- Revise the comment section in the SiteUnstructuredAddress2 and SiteUnstructuredAddress3 fields.
- Consequently, populate the relevant information into PostalUnstructuredAddress fields.
- Revise the description text for various fields to improve clarity.

Based on the feedback from participants submissions, the IEC considers that the Changes will better facilitate the timely transfer of customers to the RoLR during a RoLR event.

2.3.2 In-text referencing corrections and clarifications

The IEC has implemented the following Changes to correct the in-text referencing which received unanimous support in the submissions:

Clause	Current reference Version 2.3	New reference Version 2.4
102.2	5.3 (c)	7.1 (c)
102.3(a)	5.3 (a)	7.1 (a)
	5.3 (c)	7.1 (c)
102.3 (b)	8.3 (c)	10.1 (c)
	8.3 (d)	10.1 (d)
102.4(a)	5.3 (c)	7.1 (c)

102.4(b)	8.3 (c)	10.1 (c)
	8.3 (d)	10.1 (c)
102.5(a)	5.3 (c)	7.1 (c)
102.5(b)	5.3 (c)	7.1 (c)
	8.3 (d)	10.1 (e)
103.2(a)(i)	8.3 (c)	10.1 (c)
	8.3 (g)	10.1 (g)
	9.3 (e) (5)	11.2 (d) (iv)
	9.3 (f) (3)	Not applicable given second tier NMIs no longer exist post Global Settlement
	9.3 (j) (6)	11.2 (h) (v)
	11.3 (d) (5)	13.3 d) (v)
	11.3 (e) (3)	Not applicable given it is related to first tier NMIs where suspended retailer was LR, which no longer exist post Global Settlement
103.2 a) (ii)	10.3 (d) (4)	12.2 (d) (iv)
104.3 (b)	5.3 (c)	7.1 (c)
104.4(a)	3.3 (a)	5.1 (a)
104.6 (b), (c), (e) and (g)	5.3 (c)	7.1 (c)
104.6(d)	3.3 (a)	5.1 (a)
105.2(a)	9.3 (k)	11.2 (i)
	10.3 (e)	12.2 (e)
	11.3 (l)	13.3 (k)
	14.3 (f)	16.1 (f)
	15.3 b)	17.2 (b)
105.5 (a)	Part A clause 16	Part A clause 18

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 Changes, 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.	<p>The Changes are expected to:</p> <ul style="list-style-type: none"> - Improve the communications and operational processes between participants through the development of complete and consistent information exchange. - Ensure that the suspended retailer can provide customer information as per AEMO's procedural specification and not be pursued for additional customer information by the RoLR.

- Ensure that customer information is not required to be sourced from other parties, including Distributors, AER, ESCV or the administrators.

B2B Procedures should avoid unreasonable discrimination between B2B Parties.

The Changes 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 Changes 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.	<p>The Changes will:</p> <ul style="list-style-type: none"> - Ensure continued compliance by AEMO and B2B Parties with the NER. - Ensure appropriate consumer protections. - Ensure consistency between B2B Communications and business practices. - Correct clause references to avoid ambiguity by participants while following procedural requirements. - Not require a schema change to introduce the new fields in Table 102A. - Have no expected impact to AEMO or other market participants, except the suspended retailer.
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.	<p>The Changes:</p> <ul style="list-style-type: none"> - Do not impose barriers to innovation or market entry. - Allow participants to streamline their operations to better meet regulatory requirements and allow for all relevant information to be contained within the Communications structure to allow for more efficient processes. - Supports prompt, seamless, and accurate customer account creation, thereby enhancing the customer's experience
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 IEC is requesting feedback on the nominated implementation timeframe.

2.6 Costs

IEC expects that:

- The Changes will introduce new requirements on the suspended retailer.
- However, no other market changes will be required, including to the schema, the Low Volume Interface (MSATS Browser) or the B2B Electricity Validation Module (EVM).

However, participants should consider the costs and risks which are 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 proposed dates, considering other known or upcoming industry changes, as well as internal projects.

2.7 MSATS Procedures

AEMO considers that the IEC recommendations do not conflict with the Market Settlement and Transfer Solution Procedures.

3. B2B Proposal

The Changes are detailed in the attached change-marked B2B Procedure, which is 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
CATS	Consumer Administration and Transfer Solution
CSDN	Customer and Site Details Notification
CSV	Comma Separated Value
DNSP	Distribution Network Service Provider
FRMP	Financially Responsible Market Participant
IEC	Information Exchange Committee
LNSP	Local Network Service Provider
MC	Metering Coordinator
MCPI	Metering Coordinator Planned Interruption
MFIN	Meter Fault and Issues Notification
MP	Metering Provider
MPB	Metering Provider – Category B
MSATS	Market Settlements and Transfers Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERL	National Energy Retail Law
NMI	National Metering Identifier
NOMW	Notice of Metering Word
NP	Notified Party
NPN	Notified Party Notification
NSW	New South Wales
OWN	One Way Notification

Term	Definition
POC	Power of Choice
SO	Service Order

5. Summary of submissions in response to Second Draft Report

Table 6 Question 1: Suspended Retailer/Insolvency Official Obligation – Update of ‘Table 102 A: Customer and Site Details to Provide to RoLR’

Section	Description	Participant	Comments	IEC Response
102.3 Suspended Retailer/Insolvency Official Obligations	Update of ‘Table 102 A: Customer and Site Details to Provide to RoLR’	AGL	AGL supports these amendments to Table 102A. AGL notes that the Gas consultation for the gas equivalent customer data file is currently under consultation – see attached comparison. Since these files are both being consumer by a RoLR retailer, AGL suggest that it would be worthwhile for the structures of the data files to be aligned as far as possible – e.g. fields, formats etc. AGL also suggests that the specific data fields should be aligned to the data types – e.g. move e-mail address to being part of the customer data block. AGL also notes that some customer data fields are being proposed for the gas file which are not part of the electricity file – e.g. Concession card. AGL suggest that these files be aligned as far as possible.	The IEC notes the respondent’s support for the change. As per AGL’s feedback, existing fields of RebateCode and PensionHealthCardNumber will be retained as-is and the sequence of the newly added fields will be reorganised for better logical flow.
102.3 Suspended Retailer/Insolvency Official Obligations	Update of ‘Table 102 A: Customer and Site Details to Provide to RoLR’	CitiPower Powercor	CitiPower Powercor supports the proposed changes. CitiPower Powercor recommends aligning the changes associated with this consultation to a 2024 release for the benefit of the industry.	The IEC notes the respondent’s support for the change. With majority support, the changes covered in this report are to be effective 1 November 2023.
102.3 Suspended Retailer/Insolvency Official Obligations	Update of ‘Table 102 A: Customer and Site Details to Provide to RoLR’	Endeavour Energy	We agree with the proposal to remove the SiteUnstructuredAddress fields from table 102 A.	The IEC notes the respondent’s support for the change.
102.3 Suspended Retailer/Insolvency Official Obligations	Update of ‘Table 102 A: Customer and Site Details to Provide to RoLR’ - ADL	PLUS ES	The ‘Comment’ wording for ADL in Table 102A - conditional requirement of NMI is not SMALL. The requirement to include the ADL field in the Table has not been clarified by the Retailers. Hence, PLUS	The IEC notes the respondent’s feedback for the change and agrees with the removal of conditional requirement of ADL field for table 102A.

Section	Description	Participant	Comments	IEC Response
			<p>ES proposes for the conditional criteria to be removed for the following reasons:</p> <p>The addition of conditional requirements requires extra logic/effort – removing the additional criteria could deliver efficiency.</p> <p>Classification of SMALL NMI includes all Residential customers (irrespective of their consumption usage) and Business customers.</p> <p>Providing the value for all NMIs would enable the RoLR to determine if and how, they use the field.</p> <p>Additionally, this would then require the Provisioning requirement of this ADL field to be amended from R (Required) to M (Mandatory).</p>	
102.3 Suspended Retailer/Insolvency Official Obligations	Update of 'Table 102 A: Customer and Site Details to Provide to RoLR' – Life Support field	PLUS ES	<p>The Comment section of this 'new' field includes the following:</p> <p>As defined in the LifeSupportNotification transaction in the B2B Procedure: Customer and Site Details Notification Process. The valid values for and format of this component are as per the definition of LifeSupportStatus in the B2B Procedure: Customer and Site Details Notification Process.</p> <p>It is contradictory to define the field, as defined in the LifeSupportNotification transaction in the B2B Procedure: Customer and Site Details Notification (CSDN) Process when the allowable values in the RoLR procedure have been amended and do not align with the values in the CSDN Process.</p> <p>PLUS ES recommends:</p> <p>The allowable values are amended to reflect those of the LifeSupportNotification transaction in the B2B Procedure: Customer and Site Details Notification Process or</p> <p>The comment section is reworded for clarity i.e. the allowable fields are defined in the comments section accordingly, without referencing the LifeSupportNotification transaction.</p>	<p>The IEC notes the respondent's feedback for the change.</p> <p>Reference to the LSN transaction has been made for clarity, and the current wording states "The valid values for and format of this component are as per the definition of LifeSupportStatus in the B2B Procedure: Customer and Site Details Notification Process, however for the purpose of this report, allowed values are:</p> <ul style="list-style-type: none"> • Registered - No Medical Confirmation • Registered - Medical Confirmation • None"
102.3 Suspended Retailer/Insolvency Official Obligations	Battery/EV	Red/Lumo	<p>Battery/EV is not required to be able to offer a standard retail contract, nor is this otherwise considered a B2B field.</p> <p>Additionally, a Mandatory field with an Unknown response is effectively a Required (if known) field, making this an illogical suggestion. If it is included, then the field should be Required not Mandatory.</p> <p>It is also arguable that the inclusion of Battery in Table 102 is commercially sensitive to the customer as well as constituting data which unreasonably discriminates.</p>	<p>The IEC notes the respondent's feedback for the change.</p> <p>Inclusion of 'Battery' was proposed during initial stages of ICF (by AGL), and while it is possibly less critical today, it will likely become more critical moving forward.</p> <p>Having said that, it's inclusion will be made as a 'required' field instead of 'mandatory' as per Red/Lumo's feedback.</p>

Section	Description	Participant	Comments	IEC Response
			between B2B Parties by providing it to the RoLR when this information is not visible in MSATS and not required for the RoLR to manage a deemed arrangement and offer a standard retail contract.	
102.3 Suspended Retailer/Insolvency Official Obligations	ConcessionCardNumber	Red/Lumo	This appears to be a timely update to match the current terminology renaming the field from PensionHealthCardNumber.	The IEC notes the respondent's support for the change. As per industry feedback, the current values of RebateCode and PensionHealthCardNumber will be retained to align with Gas RoLR report, however, the reference to CSDN procedures will be corrected.
102.3 Suspended Retailer/Insolvency Official Obligations	LifeSupportStatus	Red/Lumo	The SensitiveLoad field already carries indication of the customer's requirement for LifeSupport protections, if this field is to be effective it requires an indication of the RegistrationOwner to prevent the RoLR from incorrectly asking the customer for medical confirmation which has already been provided to the LNSP.	The IEC notes the respondent's feedback for the change. SensitiveLoad field in the CSDN transaction is not used as a source of truth to record Life Support. As such, and for avoidance of doubt, RegistrationStatus used in the LSN transaction was included as per the feedback provided during the first round of consultation. Regarding 'RegistrationOwner' field, it can only be included in the future versions as it will require consultation prior to its inclusion.
102.3 Suspended Retailer/Insolvency Official Obligations	RegistrationOwner	Red/Lumo	This additional field should also be added to Table 102 requiring both the failed retailer and the LNSP to indicate who the RegistrationOwner is to prevent the RoLR from incorrectly asking the customer for medical confirmation which has already been provided to the LNSP.	The IEC notes the respondent's feedback for the change. Regarding 'RegistrationOwner' field, it can only be included in the future versions as it will require consultation prior to its inclusion.
102.3 Suspended Retailer/Insolvency Official Obligations	Field Format of proposed fields	Red/Lumo	Are the string lengths appropriate to the proposed values? Those listed below appear to be ten times longer than required? Average Daily Load VARCHAR (200) Business_ABN VARCHAR (200) BillingPreference VARCHAR (100) BillingFrequency VARCHAR (100)	The IEC notes the respondent's feedback for the change. The following corrections will be made in accordance with current aseXML standard where available: Average Daily Load: NUMBER (10) Business ABN: NUMBER (11) BillingPreference: VARCHAR (20) BillingFrequency: VARCHAR (20)
102.3 Suspended Retailer/Insolvency Official Obligations		Red/Lumo	Noting that the original purpose of Table 102 is to allow a RoLR to reconcile B2B Data held by both the failed retailer and the LNSP, Red Energy and Lumo Energy	The IEC notes the respondent's feedback for the change. Table 102 has been a critical part of the NEM RoLR Procedures, and will be retained unless

Section	Description	Participant	Comments	IEC Response
			<p>(Red and Lumo) question the inclusion of data in Table 102 which is not used elsewhere in B2B Procedures. We also question the requirement for a failed retailer to extract and transform data which is not otherwise used in B2B communications at a point in time when they are already in turmoil and facing challenges to manage their business.</p> <p>The existing Table 102 lists the B2B Procedure which is the source of each field, ensuring all data is a familiar format and content and may be easily extracted from their systems.</p> <p>Red and Lumo recognise the potential customer experience benefits of the RoLR obtaining Business_ABN, HardshipIndicator, BillingPreference, BillingFrequency & LifeSupportStatus. We recommend an additional field which describes the life support RegistrationOwner for clarity of who holds, or needs to obtain, MedicalConfirmation with the customer.</p> <p>Proposed fields Solar and CustomerClassificationCode duplicate MSATS Standing Data or in the case of AverageDailyLoad, duplicate data already provided to the RoLR by AEMO in ROLR_013 NMI List for RoLR\FRMP.</p> <p>While it may be easier for the RoLR to receive this data, we are creating greater obligations on a failed retailer or their administrators to supply data which is readily accessible elsewhere and will require additional effort for the failed retailer to supply.</p> <p>It is also arguable that the inclusion of Battery in Table 102 is commercially sensitive to the customer as well as constituting data which unreasonably discriminates between B2B Parties by providing it to the RoLR when this information is not visible in MSATS and not required for the RoLR to manage a deemed arrangement and offer a standard retail contract.</p> <p>This additional data also appears to be the cause for Table 102-B since without these fields the critical difference between the proposed Table 102A and 102B is a short list of fields which could be listed 'R' Required if held instead of 'M' Mandatory.</p>	<p>there's a better alternative suggested by the industry, or if there's an opportunity to review it during the AEMO's RoLR review.</p> <p>Currently, table 102 has been provided by failed retailer as well as the distributor, however for clarity, it was agreed during first round of consultation that two separate tables should be created. As such, table 102 A (specific for failed retailer) and table 102 B (specific for distributor) has been created to ensure the original scope of proposed changes do not inadvertently impact any distributor obligations.</p> <p>Regarding 'RegistrationOwner' field, it can only be included in the future versions as it will require consultation prior to its inclusion.</p> <p>Regarding fields available in MSATS, the intent is for a RoLR to receive the additional data in one file, to increase the efficiency in creating customer accounts and customer comms. It will also assist in reconciling this data with MSATS information. This additional information (ADL, CCC, Solar fields) is being asked to minimise having to undertake NMI discovery transactions and then link these with the customer file.</p> <p>Inclusion of 'Battery' was proposed during initial stages of ICF (by AGL), and while it is possibly less critical today, it will likely become more critical moving forward.</p>
102.3 Suspended Retailer/Insolvency Official Obligations	Customer Classification Code	Red/Lumo	<p>This is duplication of data readily available in MSATS and the failed retailer should not be required to provide it in the Customer and Site Details to Provide to RoLR. The purpose of Table 102 should be to provide B2B Data not otherwise obtainable i.e. data not in MSATS.</p>	<p>The IEC notes the respondent's feedback for the change.</p> <p>Regarding fields available in MSATS or other RoLR Reports, the intent is for a RoLR to receive the additional data in one file, to</p>

Section	Description	Participant	Comments	IEC Response
			As the ROLR has a deemed contract with the customer and is expected to offer a standard retail contract, the ROLR should expect to obtain\review the customer's Standing Data in order to provide this contract.	increase the efficiency in creating customer accounts and customer comms. It will also assist in reconciling this data with MSATS information. This additional information (ADL, CCC, Solar fields) is being asked to minimise having to undertake NMI discovery transactions and then link these with the customer file.
102.3 Suspended Retailer/Insolvency Official Obligations	Average Daily Load	Red/Lumo	This data is already provided to the RoLR in ROLR_013 NMI List for RoLR\FRMP: "NMI list by MSATS Participant of all NMIs where the Failed Retailer is the Current FRMP. This list will also include ADLs for each NMI".	The IEC notes the respondent's feedback for the change. Regarding fields available in MSATS or other RoLR Reports, the intent is for a RoLR to receive the additional data in one file, to increase the efficiency in creating customer accounts and customer comms. It will also assist in reconciling this data with MSATS information. This additional information (ADL, CCC, Solar fields) is being asked to minimise having to undertake NMI discovery transactions and then link these with the customer file.
102.3 Suspended Retailer/Insolvency Official Obligations	Solar	Red/Lumo	This is duplication of data readily obtainable from MSATS and the failed retailer should not be required to provide it in the Customer and Site Details to Provide to RoLR. The purpose of Table 102 should be to provide B2B Data not otherwise obtainable i.e., data not in MSATS. As the ROLR has a deemed contract with the customer and is expected to offer a standard retail contract, the ROLR should expect to obtain\review the customer's Standing Data in order to provide this contract.	The IEC notes the respondent's feedback for the change. Regarding fields available in MSATS or other RoLR Reports, the intent is for a RoLR to receive the additional data in one file, to increase the efficiency in creating customer accounts and customer comms. It will also assist in reconciling this data with MSATS information. This additional information (ADL, CCC, Solar fields) is being asked to minimise having to undertake NMI discovery transactions and then link these with the customer file.
102.3 Suspended Retailer/Insolvency Official Obligations	Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'	TasNetworks	PostalUnstructuredAddress2 and PostalUnstructuredAddress3 Comment details make reference to SiteUnstructuredAddress2 and SiteUnstructuredAddress3 respectively which are proposed to be deleted. Therefore, any referenced information will need to be populated directly into the respective PostalUnstructuredAddress fields.	The IEC notes the respondent's feedback for the change. PostalUnstructuredAddress2 and PostalUnstructuredAddress3 Comment details will be amended to remove reference to unstructured site address. The SiteUnstructuredAddress2 and 3 fields from v2.3 of RoLR procedures have been

Section	Description	Participant	Comments	IEC Response
				modified and populated into PostalAddress fields accordingly.
102.3 Suspended Retailer/Insolvency Official Obligations	Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'	United Energy	United Energy supports the proposed changes. United Energy recommends aligning the changes associated with this consultation to a 2024 release for the benefit of the industry.	The IEC notes the respondent's support for the change. With majority support, the changes covered in this report are to be effective 1 November 2023.

Summary

For Gas – Include

For Electricity - Include

Customer Classification

Rebate Code (Pension Card, Health Care Card, Health Benefits Card, Veterans Affairs Card)

Billing Preference

Billing Frequency

Life Support Status

Site Hazard Description

Table 7 Question 2: LNSP Obligations – Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR'

Section	Description	Participant	Comments	IEC Response
102.4 LNSP Obligations	Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR'	AGL	AGL supports these amendments to Table 102A.	The IEC notes the respondent's support for the change.

Section	Description	Participant	Comments	IEC Response																													
102.4 LNSP Obligations	Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR'	CitiPower Powercor	CitiPower Powercor supports the proposed changes. CitiPower Powercor recommends aligning the changes associated with this consultation to a 2024 release for the benefit of the industry.	The IEC notes the respondent's support for the change. With majority support, the changes covered in this report are to be effective 1 November 2023.																													
102.4 LNSP Obligations	Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR'	Endeavour Energy	We agree with the proposed changes in table 102 B.	The IEC notes the respondent's support for the change.																													
102.4 LNSP Obligations	Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR' – Clause 102.4 (a)	PLUS ES	Incorrect References - PLUS ES recommends a revision and amendment of the following – Clause 102.4 (a) makes mention of Clause 5.3 c). PLUS ES was unable to locate clause 5.3 c) in the RoLR procedures.	<p>The IEC agrees with the respondent's feedback for the change. The IEC notes that clause 5.3 c) has been referenced in a number of other subclauses throughout the document and noticed that it appeared in the pre-2017 version (link: RoLR v1.3 Procedures). As such, clause 5.3 c) has been replaced with clause 7.1 c) and update will be made to ensure all the incorrect references are fixed. Subsequently, there are incorrect references to several clauses that will be corrected as per below table:</p> <table border="1"> <thead> <tr> <th>Clause</th> <th>Current reference</th> <th>To be replaced with</th> </tr> </thead> <tbody> <tr> <td>102.2</td> <td>5.3 c)</td> <td>7.1 c)</td> </tr> <tr> <td rowspan="2">102.3(a)</td> <td>5.3 a)</td> <td>7.1 a)</td> </tr> <tr> <td>5.3 c)</td> <td>7.1 c)</td> </tr> <tr> <td rowspan="2">102.3 (b)</td> <td>8.3 c)</td> <td>10.1 c)</td> </tr> <tr> <td>8.3 d)</td> <td>10.1 d)</td> </tr> <tr> <td>102.4(a)</td> <td>5.3 c)</td> <td>7.1 c)</td> </tr> <tr> <td rowspan="2">102.4(b)</td> <td>8.3 c)</td> <td>10.1 c)</td> </tr> <tr> <td>8.3 d)</td> <td>10.1 e)</td> </tr> <tr> <td rowspan="2">102.5(a)</td> <td>5.3 c)</td> <td>7.1 c)</td> </tr> <tr> <td>5.3 c)</td> <td>7.1 c)</td> </tr> </tbody> </table>	Clause	Current reference	To be replaced with	102.2	5.3 c)	7.1 c)	102.3(a)	5.3 a)	7.1 a)	5.3 c)	7.1 c)	102.3 (b)	8.3 c)	10.1 c)	8.3 d)	10.1 d)	102.4(a)	5.3 c)	7.1 c)	102.4(b)	8.3 c)	10.1 c)	8.3 d)	10.1 e)	102.5(a)	5.3 c)	7.1 c)	5.3 c)	7.1 c)
Clause	Current reference	To be replaced with																															
102.2	5.3 c)	7.1 c)																															
102.3(a)	5.3 a)	7.1 a)																															
	5.3 c)	7.1 c)																															
102.3 (b)	8.3 c)	10.1 c)																															
	8.3 d)	10.1 d)																															
102.4(a)	5.3 c)	7.1 c)																															
102.4(b)	8.3 c)	10.1 c)																															
	8.3 d)	10.1 e)																															
102.5(a)	5.3 c)	7.1 c)																															
	5.3 c)	7.1 c)																															

Section	Description	Participant	Comments	IEC Response
				102.5(b) 8.3 d) 10.1 e)
				103.2(a)(i) 8.3 c) 10.1 c)
				8.3 g) 10.1 g)
				9.3 e) 5) 11.2 d) iv)
				9.3 f) 3) N/A
				9.3 j) 6) 11.2 h) v)
				11.3 d) 5) 13.3 d) v)
				11.3 e) 3) N/A
				11.3 i) 6) 13.3 h) v)
				103.2 a)(ii) 10.3 d) 4) 12.2 d) iv)
				104.3 (b) 5.3 c) 7.1 c)
				104.4(a) 3.3 a) 5.1 a)
				104.6 (b), (c), (e) and (g) 5.3 c) 7.1 c)
				104.6(d) 3.3 a) 5.1 a)
				105.2(a) 9.3 k) 11.2 i)
				10.3 e) 12.2 e)
				11.3 l) 13.3 k)
				14.3 f) 16.1 f)
				15.3 b) 17.2 b)
				105.5 (a) Part A clause 16 Part A clause 18

Section	Description	Participant	Comments	IEC Response
102.4 LNSP Obligations	Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR' – Clause 102.4 (b)	PLUS ES	Incorrect References – References have been made to clause 8.3 c) and d) in clause 102.4 (b). PLUS ES was unable to locate clause 8.3 in the RoLR procedures. PLUS ES recommends a revision and amendment of the references for clarity.	The IEC agrees with the respondent's feedback for the change. The IEC notes that clause 5.3 c) has been referenced in a number of other subclauses throughout the document and noticed that it appeared in the pre-2017 version (link: RoLR v1.3 Procedures). As such, clause 5.3 c) has been replaced with clause 7.1 c) and update will be made to ensure all the incorrect references are fixed. Subsequently, there are incorrect references to several clauses that will be corrected as per the table in above section.
102.4 LNSP Obligations	Update of 'Table 102 B: Customer and Site Details to Provide to RoLR' – Life Support field	PLUS ES	The Comment section of this 'new' field includes the following: As defined in the LifeSupportNotification transaction in the B2B Procedure: Customer and Site Details Notification Process. The valid values for and format of this component are as per the definition of LifeSupportStatus in the B2B Procedure: Customer and Site Details Notification Process. It is contradictory to define the field, as defined in the LifeSupportNotification transaction in the B2B Procedure: Customer and Site Details Notification (CSDN) Process when the allowable values in the RoLR procedure have been amended and do not align with the values in the CSDN Process. PLUS ES recommends: The allowable values are amended to reflect those of the LifeSupportNotification transaction in the B2B Procedure: Customer and Site Details Notification Process or The comment section is reworded for clarity i.e. the allowable fields are defined in the comments section accordingly, without referencing the LifeSupportNotification transaction.	The IEC notes the respondent's feedback for the change. Reference to the LSN transaction has been made for clarity, and the current wording states "The valid values for and format of this component are as per the definition of LifeSupportStatus in the B2B Procedure: Customer and Site Details Notification Process, however for the purpose of this report, allowed values are: • Registered - No Medical Confirmation • Registered - Medical Confirmation • None"
102.4 LNSP Obligations	Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR'	Red/Lumo	The critical difference between the proposed Table 102A and 102B is a short list of fields which should be listed 'R' Required if held instead of 'M' Mandatory. - three which should be listed 'R' Required if held instead of 'M' Mandatory so that the LNSP is not expected to populate them: HardshipIndicator - not held by LNSP BillingPreference - not held by LNSP BillingFrequency - not held by LNSP	The IEC notes the respondent's feedback for the change. Currently, table 102 has been provided by failed retailer as well as the distributor, however for clarity, it was agreed during first round of consultation that two separate tables should be created. As such, table 102 A (specific for failed retailer) and table 102 B (specific for distributor) has been created to ensure the original scope

Section	Description	Participant	Comments	IEC Response
			<p>- and a further three fields which should not be considered in Table 102;</p> <p>CustomerClassification - available in MSATS Standing Data</p> <p>Solar - identifiable from MSATS Standing Data</p> <p>Battery/EV - a standard retail contract can be prepared without this data, and it would not normally be available to a retailer without the customer's direct consent. Consequently, we do not consider a new Table 102B to be required for this procedure.</p> <p>Having said this, the LNSP is arguably better positioned to communicate the presence of Solar or a Battery as they have access to the DER register, so why would these fields be present in 102A but not 102B?</p> <p>In short, if the fields duplicating MSATS data were omitted and BillingPreference, BillingFrequency and HardshipIndicator marked 'R' then the LNSP would not be expected to provide them, however the failed retailer would still be Required to - they're not optional.</p>	<p>of proposed changes do not inadvertently impact any distributor obligations.</p> <p>Regarding 'RegistrationOwner' field, it can only be included in the future versions as it will require consultation prior to its inclusion.</p> <p>Regarding fields available in MSATS, the intent is for a RoLR to receive the additional data in one file, to increase the efficiency in creating customer accounts and customer communications. It will also assist in reconciling this data with MSATS information. This additional information (ADL, CCC, Solar fields) is being included to minimise having to undertake NMI discovery transactions and then link these with the customer file.</p> <p>Inclusion of 'Battery' was proposed during initial stages of ICF (by AGL), and, while it is possibly less critical today, it will likely become more critical moving forward.</p> <p>Having said that, these fields will be made as 'required' instead of 'mandatory' as per Red/Lumo's feedback.</p>
102.4 LNSP Obligations	Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR'	TasNetworks	PostalUnstructuredAddress2 and PostalUnstructuredAddress3 Comment details make reference to SiteUnstructuredAddress2 and SiteUnstructuredAddress3 respectively which are not contained in Table 102-B and are proposed to be deleted from Table 102-A. Therefore, any referenced information will need to be populated directly into the respective PostalUnstructuredAddress fields.	<p>The IEC notes the respondent's feedback for the change.</p> <p>PostalUnstructuredAddress2 and PostalUnstructuredAddress3 Comment details will be amended to remove reference to unstructured site address.</p> <p>The SiteUnstructuredAddress2 and 3 fields from v2.3 of RoLR procedures have been modified and populated into PostalAddress fields accordingly.</p>
102.4 LNSP Obligations	Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR'	TasNetworks	Footnote at bottom of Table 102-B referring to definition of DATE (8) is not required as there are no fields in this table requiring this format.	The IEC agrees with the respondent's feedback for the change.
102.4 LNSP Obligations	Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR'	United Energy	United Energy supports the proposed changes. United Energy recommends aligning the changes associated with this consultation to a 2024 release for the benefit of the industry.	<p>The IEC notes the respondent's support for the change.</p> <p>With majority support, the changes covered in this report are to be effective 1 November 2023.</p>

Table 8 Question 3: LNSP Obligations – Editing of section (b), (e) an (g)

Section	Description	Participant	Comments	IEC Response
104.4 LNSP Obligations	Editing of section (b), (e) an (g)	AGL	AGL supports these amendments to Table 102A.	The IEC notes the respondent's support for the change.
104.4 LNSP Obligations	Editing of section (b), (e) an (g)	CitiPower Powercor	CitiPower Powercor supports the proposed changes. CitiPower Powercor recommends aligning the changes associated with this consultation to a 2024 release for the benefit of the industry.	The IEC notes the respondent's support for the change. With majority support, the changes covered in this report are to be effective 1 November 2023.
104.4 LNSP Obligations	Editing of section (b), (e) an (g)	Endeavour Energy	Endeavour Energy has no objections to this change.	The IEC notes the respondent's support for the change.
104.4 LNSP Obligations	Editing of section (b), (e) an (g)	PLUS ES	Clause (e): The inclusion of the additional wording 'de-energisations for' has the following outcomes: Amended the intent of the original clause (e) and Duplicated an obligation already defined in clause (c). PLUS ES recommends a review and clarification of the obligation of clause (e). If the intent is for service orders other than de-energisation, remove additional wording and clarify. If the intent is to reference de-energisation service orders, delete clause (e), due to duplication.	The IEC notes the respondent's feedback for the change. Clause e) was amended, as per Intellihub's feedback during the first-round consultation, to provide clarity. Moreover, clause e) is targeted for 'non completion' of a DNP Service Order, and clause e) is a subsequent clause where a DNP is unable to be cancelled. <div data-bbox="1355 778 1993 1029" style="border: 1px solid black; padding: 5px;"> <p>2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure.</p> <p>Question 2: Do you support the proposed changes with regards to RoLR Procedure table section 104.4? (Answer should be one of "Yes", "No" – "provide reason" / "Other – provide reason")</p> <p>We support in principle that other service providers, like the MC, MP and MDP, should be supporting the orderly transfer of services from the Suspended Retailer to the RoLR. We wish to submit the following feedback to clarify and strengthen this:</p> <p>1. Clause 104.4.a. This clause references clause 3.3.a, however this clause does not exist in the document. We suggest that this be correct we believe it should reference clause 3.3.a)</p> <p>2. Clause 104.4.b. This clause mandates that a Business Rejection be sent indicating that 'The Request falls outside the LNSP's regulatory and contractual obligations'. For better clarity, we suggest the quoted message reference a Service Provider. We suggest the quoted message be reworded to: 'The Request falls outside the Service Provider's regulatory and contractual obligations.'</p> <p>3. Clause 104.4.c. This clause references the LNSP, for better clarity we suggest that this be replaced with Service Provider. We suggest this clause be reworded to: '...except where the Service Provider considers the field work is unable to be cancelled...'</p> <p>4. Clause 104.4.d. This clause references clause 4.1 of the B2B Procedure for the Service Order Response. This reference is incorrect and it should be 4.2. To avoid confusion we suggest this be corrected.</p> <p>5. Clause 104.4.e. This clause mentions 'non-payment Service Order' for clarity and consistency with clause 104.4.c we suggest that this be replaced with 'De-Energisation for non-payment Service Order'</p> <p>6. Clause 104.4.g. This clause references clause 104.4.d and then duplicates the obligations defined in clause 104.4.d. To avoid confusion we suggest the following:</p> <ul style="list-style-type: none"> Clause 104.4.d. remove the two bullet points and reference clause 104.4.g for the content and format Clause 104.4.g. In addition to referencing clause 104.4.d, it should also reference clause 104.4.f </div> <p>The IEC notes the respondent's comments and agrees to update the Procedure as per feedback. Reference to MCs/MPs has been removed.</p>
104.4 LNSP Obligations	Editing of section (b), (e) an (g)	Red/Lumo	Red and Lumo support these changes which enable communication of B2B Data between participants in the wake of a RoLR event.	The IEC notes the respondent's support for the change.
104.4 LNSP Obligations	Editing of section (b), (e) an (g)	TasNetworks	1st dot point in 104.4(d) should reference clause 4.1, not 4.2, as it is referring to the S/O Request. Suggest rewording 104.4(e) to relate to 'De-energisation ServiceOrderType with De-EnergisationReason of Non-Payment (DNP)' as	The IEC agrees with the respondent's feedback for the change related to section 104.4(d). Regarding suggested rewording for 104.4(e), further work will be required following the end-to-end RoLR review to enhance this clause as it may contain other disconnection types.

Section	Description	Participant	Comments	IEC Response
			these are the fields and values defined in the Service Order Process.	
104.4 LNSP Obligations	Editing of section (b), (e) an (g)	United Energy	United Energy supports the proposed changes. United Energy recommends aligning the changes associated with this consultation to a 2024 release for the benefit of the industry.	The IEC notes the respondent's support for the change. With majority support, the changes covered in this report are to be effective 1 November 2023.

Table 9 Question 4: RoLR Obligations – Addition of clause 104.4(g) in section (b)

Section	Description	Participant	Comments	IEC Response
104.5 RoLR Obligations	Addition of clause 104.4 (g) in section (b)	AGL	AGL supports these amendments to Table 102A.	The IEC notes the respondent's support for the change.
104.5 RoLR Obligations	Addition of clause 104.4 (g) in section (b)	CitiPower Powercor	CitiPower Powercor supports the proposed changes. CitiPower Powercor recommends aligning the changes associated with this consultation to a 2024 release for the benefit of the industry.	The IEC notes the respondent's support for the change. With majority support, the changes covered in this report are to be effective 1 November 2023.
104.5 RoLR Obligations	Addition of clause 104.4 (g) in section (b)	Endeavour Energy	Endeavour Energy has no objections to this change.	The IEC notes the respondent's support for the change.
104.5 RoLR Obligations	Addition of clause 104.4 (g) in section (b)	Red/Lumo	Red and Lumo support these changes which enable communication of B2B Data between participants in the wake of a RoLR event.	The IEC notes the respondent's feedback for the change.
104.5 RoLR Obligations	Addition of clause 104.4 (g) in section (b)	TasNetworks	For clause 104.5(b), the reference to 104.4(g)(ii) should be replaced with 104.4(f) as this is the clause that refers to the list being provided to the ROLR.	The IEC agrees with the respondent's feedback for the change.
104.5 RoLR Obligations	Addition of clause 104.4 (g) in section (b)	United Energy	United Energy supports the proposed changes. United Energy recommends aligning the changes associated with this consultation to a 2024 release for the benefit of the industry.	The IEC notes the respondent's support for the change. With majority support, the changes covered in this report are to be effective 1 November 2023.