

B2B Procedures

- RoLR Procedures Part B

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Intellihub

Completion Date: 30 March 2023

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1. Issues Paper Questions

Topic	Question	Comments
2.1 Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'	Question 1: Do you support the proposed changes with regards to RoLR Procedures table 102-A? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	

<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 Procedures 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> <ol style="list-style-type: none"> 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 5.1.a) 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’. 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 ...’ 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. 5. Clause 104.4.e: This clause mentions ‘non-payment Service Orders’ for clarity and consistency with clause 104.4.c we suggest that this be replaced with ‘De-Energisation for non-payment Service Orders’ 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:
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Topic	Question	Comments
		<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
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	Question 3: Do you support the proposed changes with regards to RoLR Procedures table section 104.5? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)	

<p>General</p>	<p>Question 4: If the changes proposed were to be expedited, would your organisation have any issues in implementing the changes by 15 May 2023?</p>	<p>We support the expedited consultation process as the proposed changes are non-controversial. However, we do not support an effective start date of 15 May 2023 for the new obligations for Metering Service Providers because changes to systems and processes are necessary to ensure compliance with these new obligations.</p> <p>We note that one of the B2B Factors is ‘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’. We understand that 15 May 2023 was proposed because as per the consultation paper ‘The Changes are not expected to require system changes to the B2B e-Hub or market participant systems. From a business process perspective, the IEC is requesting feedback on the nominated implementation timeframe.’</p> <p>We wish to highlight that system and process changes are necessary to ensure compliance with these new obligations and therefore request for a reasonable implementation timeframe. We suggest an effective start date of 1 October 2023 as there are already a number of committed projects (both industry and internally driven) and due to the complexity and size of the change required for compliance. We believe a 5-month period from final determination is a reasonable implementation timeframe.</p> <p>The proposed changes to clause 104.4 look simple from a documentation point of view because the Metering Service Provider is given the same obligations as the LNSP. However, we identified that as a Metering Service Provider we have additional complexities that we must handle compared to a LNSP. For example, we operate in different jurisdictions while a LNSP only operates in one jurisdiction. This means that it is more likely that we will need to deal with multiple ROLRs (while a LNSP is likely to deal with only one ROLR). In addition, as remote disconnection/reconnection services continue to increase in volume for Metering Service Providers, manual intervention when a ROLR event is</p>
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Topic	Question	Comments
		<p>declared would be ineffective and system changes are required to ensure compliance and to avoid unintended impacts to the end use customer.</p> <p>It is not our intention to withhold the benefit of the other changes in this consultation therefore we would be supportive of the changes under table 102A becoming effective 15 May 2023 while the remaining changes becoming effective 1 October 2023.</p>
General	Question 5: 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.	