



Information Exchange Committee
C/ - IEC Secretariat – AEMO Ltd

Level 22

530 Collins Street

Melbourne VIC 3000

Tel: (03) 9609 8000

Fax: (03) 9609 8080

Consultation on
NEM Retailer of Last Resort (RoLR)
Processes Part B
– Business to Business (B2B)
Procedure v2.4

9 Jun 2023

Draft Report

RoLR B2B Procedure v2.4 Consultation

Draft Report

Date of Notice: 9 June 2023

Notice of Second Stage Consultation

This Notice of Second Stage of rules Consultation (Notice) informs all 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, on behalf of the IEC, AEMO is conducting the Second Stage Consultation (Consultation) on the changes (Changes) which are proposed (Proposal) to the NEM RoLR Processes Part B – B2B Procedure v2.4 (Procedure).

This 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. This Consultation is a standard rules consultation under NER 8.9.2. This Draft Report is published under NER 8.9.2(b).

Initially, the Consultation was an expedited rules consultation under NER 8.9.3. The draft report was published under NER 8.9.3(a) (Initial Draft Report).

The consultation process

The IEC invites written submissions on the Proposal, including any alternative or additional proposals which you consider may better meet its objectives, 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 10 July 2023 to NEM.Retailprocedureconsultations@aemo.com.au. The response template has been provided on AEMO's website. Please send any queries in respect of the 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. A late submission should explain the reason for lateness and the detriment to the proponent if the IEC does not consider the submission.

Please identify any parts of your submission which you wish to remain confidential, explaining why. The IEC has asked AEMO to manage such information to avoid any confidentiality issues. Any confidential information will be the subject of a de-identified analysis which will be provided to the IEC and Business-to-Business Working Group (B2B-WG), to enable their decisions to be made impartially. The IEC may still publish that information, if it does not consider it to be confidential, but will consult with you before doing so. Material

identified as confidential may be given less weight in the decision-making process than material that is published.

In your submission, you may request a meeting with the IEC to discuss the matters in the 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 1 Summary of consultation stages

Process Stage	Date
Publication of Initial Draft Report	2 March 2023
Closing date for submissions in response to Initial Draft Report	31 March 2023
Publication of Draft Report and Determination	9 June 2023
Closing date for submissions in response to Draft Report	10 July 2023
Publication of Final Report and Determination (Final Report)	18 Sep 2023

The IEC developed the Changes in the interests of improving the B2B Procedures. 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 B2B-WG.

Executive Summary

The changes are intended to:

- enhance the information provided to the RoLR in the RoLR B2B Customer Details Report (Table 102A), to enable the RoLR to service the customers of the suspended retailer;
- more efficiently reduce the impact caused by the failure of the suspended retailer;
- correcting the in-text referencing errors in clause 104.5 of the Procedure; and
- fix some errors more broadly in certain subclauses of the Procedure.

The key issues arising in submissions were:

- All respondents acknowledged the gaps that exists in the Procedure.
- Some respondents provided feedback that was over and above the scope of the Proposal in its initial form.
- Some respondents did not support the proposed go-live date of 15 May 2023, mainly on the basis of on the lack of adequate time required to implement changes to systems and processes necessary to ensure compliance with the Procedure.
- Some respondents did not support the additional obligations in respect of the contestable metering service providers. Some respondents suggested a broader review of the Procedure be undertaken. This review would focus on ensuring that the Procedure is current, valid and enables the operational processes and contestable model for participants in respect of smart metering, e.g., remote services.
- Some respondents did not support the addition of some of the new data fields from the suspended retailer, as that information might already be available in MSATS.

After consideration of the issues raised in participant submissions and on advice of the B2B-WG, the IEC has:

- Switched the Consultation to a standard rules consultation under NER 8.9.3. This switch allows the Consultation to include the additional round of consultation on the Proposal, giving participants the opportunity to review and comment on the Proposal.
- Addressed the manifest errors, by fixing the incorrect links and references to ensure accuracy and clarity.
- Included suggested enhancements to the RoLR B2B Customer Details report. This report is required to be provided by the suspended retailer to the RoLR under the Procedure.
- Reduced the scope of the Consultation by removing the Changes which had been proposed regarding the treatment of inflight Service Order Requests to a non-LNSP service provider. This removal reflects 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 v2.4	Amended

Responses to the Initial Draft Report

In response to the initial draft report which AEMO published on 2 March 2023, AEMO received ten submissions, being from:

- AGL
- CitiPower Powercor
- Intellihub
- Jemena
- Origin Energy
- PLUS ES
- Red and Lumo
- SA Power Networks
- United Energy
- Vector Metering

Contents

B2B RoLR v2.4 Draft Report	2
Notice of Second Stage Consultation	2
The consultation process	2
Executive Summary	4
Responses to the Draft Report (Expedited Consultation)	5
1. Background	7
1.1 Issues statement and scope	7
1.2 Consultation plan	9
2. Proposed Changes	10
2.1 Enhanced current RoLR B2B Customer Details Report provided by the suspended retailer to the RoLR	10
2.2 In-text referencing errors	11
2.3 Additional obligations on non-LNSP service providers	11
2.4 IEC Assessment and Conclusion	12
2.5 B2B Principles	13
2.6 B2B Factors	13
2.7 Costs	14
2.8 MSATS Procedures	14
3. B2B Proposal	15
4. Glossary	16
5. Summary of submissions in response to Issues Paper	18
5.1 Draft Report Questions	18
5.2 Draft Report Submissions and IEC's Response	19
Tables	
Table 1 Summary of consultation stages	3
Table 2 Summary of Proposal	4
Table 3 B2B-WG members by sector	7
Table 4 Change effective date	8
Table 5 Consultation Date Plan	9

1. Background

This Draft Report has been prepared to summarise the Changes, as well as the related responses by the IEC. The Changes have been developed under the IEC's power to manage the ongoing development of the B2B Procedures as contemplated by NER 7.17.7(a)(2), as well as changes under NER 7.17.4.

This Draft Report provides information which is considered by the IEC in determining whether to implement the Changes, 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 has 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
Energy Australia	TasNetworks	

The relevant effective date of the changes would be 1 November 2023, as follows:

Table 4 Change effective date

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

1.2 Consultation plan

The proposed consultation plan is as follows:

Table 5 Consultation Date Plan

Stage	Start Date	End Date
Publication of Notice of Expedited Consultation and Initial Draft Report	2 March 2023	
Participant submissions to be provided to AEMO on Initial Draft Report	2 March 2023	31 March 2023
IEC to consider all valid submissions and prepare Draft Report and Determination, including change-marked Procedures	31 March 2023	8 Jun 2023
Publication of Draft Report	9 June 2023	
Participant submissions to be provided to AEMO on Draft Report	9 June 2023	10 July 2023
IEC to consider all valid submissions and prepare Final Report Final Report, including change-marked Procedures	10 July 2023	17 Sep 2023
Publication of Final Report	18 Sep 2023	

2. Proposed Changes

2.1 Enhanced current RoLR B2B Customer Details Report provided by the suspended retailer to the RoLR

2.1.1 Background

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 Procedure governs the sharing of information during a RoLR event. Table 102A provides crucial customer related information to the RoLR. Table 102A describes the information requirements to be provided by the suspended retailer and/or distributor, to enable the RoLR to perform account creation for the transferred customers.

The B2B-WG has identified the following issues in respect of Table 102A:

- Key fields are excluded which 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. This exclusion could lead to a potential risk of non-compliance of the RoLR.
- Certain fields are not mandatory which are required to ensure completeness of customer information, including Date of Birth.
- Certain fields refer to fields from the CSDN Procedure, including 'Rebate' and 'Pension card', which are no longer relevant, because they were removed from the CSDN procedure 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 from the energy regulators (the AER or the ESCV) by special request. This highlighted the fact that Table 102A currently does not adequately support all fields which are required to appropriately serve the customer transferred to the RoLR.

Issue summary and submissions

The key issues which were raised in submissions to support the Changes to Table 102A are as follows:

- All respondents recognised the issues in respect of Table 102A, including as follows:
 - SA Power Networks noted the proposed amendments and suggested that there would be value in LNSP's providing the "LifeSupportStatus" field in addition to the changes in the Initial Draft Report.
 - Citipower, Powercor, United Energy and PLUS ES recommended not deleting the unstructured postal address fields (*PostalUnstructuredAddressress1*, *PostalUnstructuredAddressress2*, *PostalUnstructuredAddressress3*), as they are still valid fields in the Customer Details Notification transaction.
 - Citipower, Powercor, United Energy and PLUS ES recommended that the values of 'Customer Classification' field should mirror the values which are provided in MSATS.
 - AGL suggested additional information which could be provided by the failed retailer, including billing preference (paper bill/e-bill) and billing frequency.
 - Red Energy/Lumo Energy did not support including some of the proposed fields which already exist in MSATS.
- Most respondents supported the need to enhance Table 102A.

2.2 In-text referencing errors

2.2.1 Background

The Proposal includes the Changes which are necessary to correct the in-text referencing errors in clause 104.5 of the Procedure.

Issue summary and submissions

All submissions agreed to the Changes to correct the in-text referencing errors.

The IEC will proceed with the Changes.

2.3 Additional obligations on non-LNSP service providers

2.3.1 Background

Clause 104.4 of the Procedure places obligations on LNSPs regarding the management of inflight Service Order Requests, which focus on inflight De-energisation for non-payment. In the Initial Draft Report, the Proposal was that these obligations should be applied to non-LNSP service providers. The basis of the Proposal was that, while this Change placed new obligations on metering parties, the Change would merely formalise processes that already existed, therefore the Change would be minor in nature.

Issue summary and submissions

A range of submissions were received on the Proposal:

- Most non-metering respondents agreed with the Proposal.
- However, some metering respondents argued that the Change was not minor in nature, because the Change would require changes to be made to systems and processes, therefore could not be implemented by the proposed effective date.
- Respondents considered that the Change did not necessarily meet the criteria for the expedited rules consultation procedure.
- Furthermore, some respondents questioned whether it was appropriate that the processes prescribed in clause 104.4 should apply where services are being provided remotely by contestable metering providers, in circumstances also where the provision of services are subject to commercial arrangements.

On further examination, the B2B-WG identified the existence also of timing issues related to the process of initiating a ROLR event by AEMO in NEM RoLR Processes Part A, which may impact the effectiveness of the requirements of Clause 104.4.

The key issues raised in submissions were as follows:

- SA Power Networks, CitiPower, Powercor, United Energy, Origin Energy, AGL and Jemena supported the Proposal.
- Intellihub supported the Proposal and provided additional feedback, including errata and clarification changes.
- Intellihub and PLUS ES did not support the proposed go-live of 15 May 2023, due to implementation concerns.
- Most respondents supported the extension of current obligations that apply to the distributors to be applied in a similar manner to the contestable service providers. However, some metering providers (PLUS ES, Vector Metering) questioned whether the Change was still relevant where remote services

were being provided. Further, PLUS ES suggested that clause 104.4 should be reviewed to ensure that clause 104.4 is current, valid and allows for the operational processes and contestable model for participants of smart metering, e.g., remote services.

2.4 IEC Assessment and Conclusion

After consideration of the issues raised in respondent submissions and on advice of the B2B-WG, the assessment and conclusion of the IEC is as follows.

2.4.1 B2B Customer Details Report (Table 102A)

The Proposal is that Table 102A should be subject to the following Changes:

- Add the fields BillingPreference and BillingFrequency to the RoLR B2B Customer Details report.
- Make the fields CustomerClassification, Solar, HardshipIndicator and Battery/EV mandatory.
- Designate the fields Business_ABN, Average Daily Load, Email Address and ConcessionCardNumber as required.
- Reinstate the fields PostalUnstructuredAddress1 to 3, which were removed in the Initial Draft Report.
- Revise the description text for various fields, to improve clarity.

Based on the feedback from participants submissions, the IEC:

- Believe that these Changes will better facilitate the timely transfer of customers to the RoLR during a RoLR event.
- Has applied the LifeSupportStatus to Table 102B, rather than table 102A, with the obligation placed on the LNSP.

The Proposal aligns with the original desired outcomes. However, affected parties (LNSPs and retailers) have not had the opportunity to consider these Changes. Accordingly, the Consultation will include another stage, to enable feedback from impacted parties.

2.4.2 In-text referencing errors

The IEC will proceed with implementing the Changes to correct the in-text referencing errors in clause 104 of the Procedure, as well as the other relevant clauses of the Procedure, given these Changes received unanimous support.

2.4.3 Additional obligations on non-LNSP service providers

Participants raised valid concerns regarding the expansion of the obligations in respect of the treatment of inflight work requests to contestable service providers, by simply extending distributor obligations.

The IEC acknowledges the need for further consideration of the impact of the Proposal, as well as the integration of the Changes with NEM RoLR Processes Part A. Accordingly, the Proposal in respect of clause 104.4 will be referred to the AEMO review of the RoLR processes, which is currently underway. The B2B-WG will closely collaborate with AEMO in this regard.

2.5 B2B Principles

The IEC considers that the B2B Draft 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.

2.6 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.

2.7 Costs

IEC expects the Changes to introduce new requirements for the suspended retailers. However, no other market changes are required including the schema, the Low Volume Interface (MSATS Browser) or the B2B Electricity Validation Module (EVM).

Nonetheless, participants should consider the costs, as well as risks, associated with the Change, including:

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

2.8 MSATS Procedures

AEMO has considered the recommendations of the IEC. AEMO does not consider that the recommendations are inconsistent with the Market Settlement and Transfer Solution Procedures.

3. B2B Proposal

The Changes are detailed in the attached change marked B2B Procedures, which are published with this Draft Report.

4. Glossary

This Draft 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 Issues Paper

5.1 Draft Report Questions

Question 1: Do you support the proposed changes with regards to RoLR Procedures Table 102A? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)

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”)

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”)

Question 4: Do you support the proposed procedure effective date of 15 May 2023? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)

5.2 Draft Report Submissions and IEC's Response

Section	Question	Participant response	IEC Response
SA Power Network			
2.1 Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'	<p>Question 1: Do you support the proposed changes with regards to RoLR Procedures table 102-A?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	<p>Other - SA Power Networks supports the change but suggest that there would be value in LNSP's providing the "Life Support Status" field to the ROLR.</p> <p>During recent ROLR events, we provided this information to the ROLR in SA.</p> <p>We suggest that "Not Required from the LNSP" is removed from the comment column of the table.</p>	<p>The IEC notes the respondent's comments and agrees to update the Procedure – to be included in the next round of consultation. Table 102-B has been created to separate suspended retailer and LNSP obligations for clarity.</p>
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>Question 2: Do you support the proposed changes with regards to RoLR Procedures table section 104.4?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	<p>Yes - SA Power Networks supports the change.</p>	<p>The IEC notes the respondent's support for the change.</p>

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>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>	Yes - SA Power Networks supports the change.	The IEC notes the respondent's support for the change.
General	<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>	This would not cause issues to SA Power Networks.	The IEC notes the respondent's support for the change.
General	<p>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.</p>	No further comments.	The IEC notes the respondent's comment.

Section	Question	Participant response	IEC Response
CitiPower Powercor			
2.1 Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'	<p>Question 1: Do you support the proposed changes with regards to RoLR Procedures table 102-A?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	<ul style="list-style-type: none"> • CitiPower Powercor supports the proposed changes, with the following exceptions: <ul style="list-style-type: none"> ○ CitiPower Powercor queries the accuracy of the draft Procedure comments in relation to the <i>Customer Classification (provided by the FRMP): 'Provide if site is Commercial or Industrial, SME or Residential. Allowed values: LARGE, SME, RESI'</i>. It should mirror what is provided in MSATS i.e. field name is <i>Customer Classification Code</i> with allowed values: <i>BUSINESS, RESIDENTIAL</i> and include a new <i>NMI Classification Code</i> field as per Question 5 below <p>CitiPower Powercor strongly recommends not deleting the unstructured postal address fields (<i>PostalUnstructuredAddress res1, PostalUnstructuredAddress res2, PostalUnstructuredAddress res3</i>) as they are still valid fields in CDNs</p>	The IEC notes the respondent's comments and agrees to update the Procedure as per feedback – to be included in the next round of consultation.
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>Question 2: Do you support the proposed changes with regards to RoLR Procedures table section 104.4?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	1. CitiPower Powercor supports the proposed changes	The IEC notes the respondent's support for the change.

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>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>	<p>2. CitiPower Powercor supports the proposed changes</p>	<p>The IEC notes the respondent's support for the change.</p>
General	<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>	<ul style="list-style-type: none"> • CitiPower Powercor has no issues implementing the proposed changes by 15 May 2023, but cannot guarantee the suggested inclusions listed in Question 5 would be made available in one report by this date <p>3. CitiPower Powercor strongly recommends a 5-week timeframe to implement system changes for the suggested inclusions listed in Question 5 from the date the final report and determination is released</p>	<p>The IEC notes the respondent's support for the change.</p>
General	<p>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.</p>	<ul style="list-style-type: none"> • CitiPower Powercor recommends including the <i>NMI Classification Code</i> field in Table 102 A as represented in MSATS, with the LNSP to provide as this field was requested by the default retailer during previous ROLR events <p>1. CitiPower Powercor strongly recommends the LNSP should provide the LifeSupportStatus field, irrespective of who the registration owner is, as the LNSP system should agree with what the retailer has and this field was requested by the default retailer during previous ROLR events</p>	<p>The IEC notes the respondent's comments and agrees to update the Procedure as per feedback.</p>

Section	Question	Participant response	IEC Response
United Energy			
2.1 Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'	<p>Question 1: Do you support the proposed changes with regards to RoLR Procedures table 102-A?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	<ul style="list-style-type: none"> • United Energy supports the proposed changes, with the following exceptions: <ul style="list-style-type: none"> ○ United Energy queries the accuracy of the draft Procedure comments in relation to the <i>Customer Classification (provided by the FRMP): 'Provide if site is Commercial or Industrial, SME or Residential. Allowed values: LARGE, SME, RESI'</i>. It should mirror what is provided in MSATS i.e., field name is <i>Customer Classificaton Code</i> with allowed values: <i>BUSINESS, RESIDENTIAL</i> and include a new <i>NMI Classifiaton Code</i> field as per Question 5 below <p>United Energy strongly recommends not deleting the unstructured postal address fields (<i>PostalUnstructuredAddressress1, PostalUnstructuredAddressress2, PostalUnstructuredAddressress3</i>) as they are still valid fields in CDNs and are utilised in United Energy</p>	The IEC notes the respondent's comments and agrees to update the Procedure as per feedback.
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>Question 2: Do you support the proposed changes with regards to RoLR Procedures table section 104.4?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	2. United Energy supports the proposed changes	The IEC notes the respondent's support for the change.

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>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>	<p>3. United Energy supports the proposed changes</p>	<p>The IEC notes the respondent's support for the change.</p>
General	<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>	<ul style="list-style-type: none"> • United Energy has no issues implementing the proposed changes by 15 May 2023, but cannot guarantee the suggested inclusions listed in Question 5 would be made available in one report by this date. <p>4. United Energy strongly recommends a 5-week timeframe to implement system changes for the suggested inclusions listed in Question 5 from the date the final report and determination is released</p>	<p>The IEC notes the respondent's support for the change.</p>
General	<p>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.</p>	<ul style="list-style-type: none"> • United Energy recommends including the <i>NMI Classification Code</i> field in Table 102 A as represented in MSATS, with the LNSP to provide as this field was requested by the default retailer during previous ROLR events <p>1. United Energy strongly recommends the LNSP should provide the LifeSupportStatus field, irrespective of who the registration owner is, as the LNSP system should agree with what the retailer has and this field was requested by the default retailer during previous ROLR events</p>	<p>The IEC notes the respondent's comments and agrees to update the Procedure as per feedback.</p>

Section	Question	Participant response	IEC Response
Origin Energy			
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")	As proponent of the proposed changes, Origin fully supports these updates to be implemented in an expedited manner.	The IEC notes the respondent's support for the change.
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	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")	As proponent of the proposed changes, Origin fully supports these updates to be implemented in an expedited manner.	The IEC notes the respondent's support for the change.

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>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>	As proponent of the proposed changes, Origin fully supports these updates to be implemented in an expedited manner.	The IEC notes the respondent's support for the change.
General	<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>	As proponent of the proposed changes, Origin fully supports these updates to be implemented in an expedited manner.	The IEC notes the respondent's support for the change.
General	<p>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.</p>	As proponent of the proposed changes, Origin fully supports these updates to be implemented in an expedited manner.	The IEC notes the respondent's support for the change.

Section	Question	Participant response	IEC Response
AGL			
2.1 Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'	<p>Question 1: Do you support the proposed changes with regards to RoLR Procedures table 102-A?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	<p>AGL supports the proposed changes.</p> <p>AGL also suggests that additionally useful information which could be provided by the failed retailer would be:</p> <p>Billing Preference Values eg – e-bill; paper</p> <p>Billing Cycle Values eg – monthly; quarterly</p>	<p>The IEC notes the respondent's comments and agrees to update the Procedure as per feedback.</p>
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>Question 2: Do you support the proposed changes with regards to RoLR Procedures table section 104.4?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	<p>AGL supports the proposed changes</p>	<p>The IEC notes the respondent's support for the change.</p>

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>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>	AGL supports the proposed changes	The IEC notes the respondent's support for the change.
General	<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>	AGL supports the proposed changes in May 2023.	The IEC notes the respondent's support for the change.
General	<p>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.</p>	N/A	The IEC notes the respondent's support for the change.

Section	Question	Participant response	IEC Response
Jemena			
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")	Yes	The IEC notes the respondent's support for the change.
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	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")	Yes	The IEC notes the respondent's support for the change.

Section	Question	Participant response	IEC Response
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")	Yes	The IEC notes the respondent's support for the change.
General	Question 4: If the changes proposed were to be expedited, would your organisation have any issues in implementing the changes by 15 May 2023?	No	The IEC notes the respondent's support for the change.
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.	No	The IEC notes the respondent's support for the change.

Section	Question	Participant response	IEC Response
Intellihub			
2.1 Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'	<p>Question 1: Do you support the proposed changes with regards to RoLR Procedures table 102-A?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>		The IEC notes no comments provided by the respondent

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>Question 2: Do you support the proposed changes with regards to RoLR Procedures table section 104.4?</p> <p>(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: <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 	<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>

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>Question 3: Do you support the proposed changes with regards to RoLR Procedures table section 104.5?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>		The IEC notes no comments provided by the respondent

Section	Question	Participant response	IEC Response
General	<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 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>	<p>The IEC notes the respondent's comments and agrees to update the Procedure as per feedback. Proposed 1st Nov 2023 go-live (aligned the go-live with AEMO November release)</p>

Section	Question	Participant response	IEC Response
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.		The IEC notes no comments provided by the respondent.
Vector			
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")	-	The IEC notes no comments provided by the respondent

2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure

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")

104.1 Says this. This needs to be expanded if MC, MP,MDP are to be included.

104.1. Application

Clause 104 applies to:

- (a) Suspended Retailer.
- (b) LNSP.
- (c) RoLR that becomes the retailer for RoLR Event Affected NMIs where the Suspended Retailer was the FRMP.

104.4 current wording "Each LNSP (and/or MC, MP, MDP and other relevant participants, as appropriate) must:" needs to be more specific. It is unclear who the 'other relevant participants' maybe. Are this participants bound by B2B requirements? Recommend the removal of 'and other relevant participants' unless they can be specified.

104.4 (b) should be reworded to reflect the correct rejection code to be used. Unclear which one is required. Options are 1945 or 2007 or 1957.

Initiator Is Not Permitted To Raise This Service Order Type.	No	Error	1945
Service Not Provided.	No	Error	2000
No Contract for service.	No	Error	2007
<i>Service Order Sub type.</i>			
The Request falls outside the Recipient's regulatory obligations.	Yes	Error	1957

104.4 (c). This process requires on AEMO producing a NMI list of "ROLR Event Affected NMI's" and this will be provided up to 2 business days after the ROLR has been declared. Customers for the failed retailers will still be deenergised until the list is provided, and then these obligation will only be effective for 1 day as it is expected AEMO will change the FRMP by the 3rd business day. CL 104.6(e) says obligations under 104.4(c) must be completed by the end of the next business day. This obligation

The IEC notes the respondent's comments and agrees to update the Procedure as per feedback. Reference to MCs/MPs has been removed.

Section	Question	Participant response	IEC Response
		<p>in effect only stop schedule DNP's for one day, after which all Remote DEENS (include DNP's) will automatically be cancelled as the FRMP will have changed in the market. We question the benefit of this obligation for remote services.</p> <p>104.4 (c). Text should be reworded to include other service providers. Should read "except where the Recipient considers the work requested is unable to be cancelled". It is expected that most of the processes related to Cancelling DNP Deenergisations will involve manual steps. Therefore there will be some lag between being advised of the ROLR NMI List and cancelling scheduled jobs. If a DNP was scheduled to occur it may still happen until the MP gets to it and cancels it.</p>	
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>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>	Yes	The IEC notes the respondent's support for the change.
General	<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>	We are ok with this date.	The IEC notes the respondent's support for the change.

Section	Question	Participant response	IEC Response
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.	<p>Clause 104 in its entirety needs review to consider the implications for remote services (remote REEN/DEEN). It may no longer be relevant for these transactions.</p> <p>AEMO also needs to clarify if a failed retailer can still issue B2B SOR after being suspended in the market. If a failed retailer cannot issue B2B SOR then a number of these obligations are redundant because Service Providers will not be able to receive a B2B transaction.</p>	The IEC acknowledges the respondent's comments and suggests this to be included in AEMO's RoLR review
PLUS ES			
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>Other –</p> <p>PLUS ES has the following comments for consideration:</p> <ul style="list-style-type: none"> Customer Classification field: The description calls for Commercial or Industrial, yet the enumeration is LARGE. Either define the LARGE enumeration in the description or amend the LARGE enumeration to COMMERCIAL/INDUSTRIAL (or an abbreviation of this to fit within the 20 Characters, i.e. C&I). HouseNumberToSuffix: Propose to include this new field in the table as it will be available on 30 May 23. Recommend including a PostalNumberToSuffix <p>Postal Unstructured address: PLUS ES acknowledges the advantages and consistency of structured addresses. In a past review of B2B Technical Delivery Specifications it was determined that unstructured addresses would still be relevant for post. If this is still a valid requirement, then the PostalUnstrutredAddress fields should remain in the table. Alternatively, the B2B Working Group should determine if references of unstructured addresses should remain/ are required in B2B procedures/documents.</p>	The IEC notes the respondent's comments and agrees to update the Procedure as per feedback.

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>Question 2: Do you support the proposed changes with regards to RoLR Procedures table section 104.4?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	<p>PLUS ES does not support the proposed changes to section 104.4, for the following reasons:</p> <ul style="list-style-type: none"> • Adding the MC, MP, MDP to this section is not sufficient and the clauses need to be reviewed to ensure they are current, valid and allow for the operational processes and contestable model for participants of smart metering. i.e. Remote services etc • Some clauses are repetitive in nature and can be streamlined for efficiency, even for the LNSP participant. • Some requirements do not add value to the process and need to be validated. <p>Some examples of specific feedback to the proposed mark ups:</p> <ul style="list-style-type: none"> • The section title could be more succinct. • Avoiding the ambiguity created by generic phrasing such as 'other relevant participants', by assigning the procedural obligation on <u>specific</u> parties. • Clause (b) in part is not applicable to parties other than the LNSP. • Clause (c) does not allow for remote services. • Clause (e) may not be applicable to the contestable service provider. • Clause (f) – is there a current requirement for 15 bus days, process could be more efficient. • Clause (g) is an almost replica of clause (d) <p>PLUS ES recommends the following and hence proposes that the changes to this section should not proceed via an expedited consultation.</p> <ul style="list-style-type: none"> • A review is undertaken of the E2E B2B NEM RoLR procedure (Part A & B) to ensure currency and efficiency. • If the proposed changes were to proceed additional analysis is required by the B2B Working group to ensure currency and efficiency. That is, creating a new section or reviewing the current section and making appropriate amendments. It is not fair and equitable to place redundant or LNSP regulated process driven obligations on contestable parties. <p>For example, PLUS ES will act on all inflight service orders and reject any new SOs, upon notification of a RoLR event, and provide a report to the RoLR on Day 1. No further reporting would be required.</p>	<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>

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>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>	<p>PLUS ES does not support the proposed changes to section 104.5, for the following reasons:</p> <ul style="list-style-type: none"> The content is dependent on the outcomes of section 104.4 clauses. We do not believe that they are sufficient or complete. It follows a review of section 104.4 will have downstream impacts on section 104.5, requiring its own review. <p>PLUS ES recommends the following and hence proposes that the changes to this section cannot proceed via an expedited consultation.</p> <ul style="list-style-type: none"> A review is undertaken of the E2E B2B NEM RoLR procedure (Part A & B) to ensure currency and efficiency. <p>If the proposed changes were to proceed additional analysis is required by the B2B Working group to ensure currency, alignment with applicable preceding sections and efficiency.</p>	<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>
General	<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>Since the implementation of the new field HouseNumberToSuffix will not be implemented until 30 May 23, PLUS ES recommends an effective date after the 30 May 23.</p> <p>PLUS ES does not support an expedited consultation of section 104.4 and 104.5.</p>	<p>The IEC notes the respondent's comments and agrees to update the Procedure as per feedback. Reference to MCs/MPs has been removed. Also, the consultation will be switched to 'standard' mode.</p>
General	<p>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.</p>	<p>No additional comments.</p>	<p>The IEC notes the respondent's support for the change.</p>

Section	Question	Participant response	IEC Response
Red/Lumo			
<p>2.1 Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'</p>	<p>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>	<p>Although Red Energy and Lumo Energy (Red and Lumo) are supportive of some of the proposed changes from AEMO we are concerned that many are duplications of the existing MSATS Standing Data.</p> <p>The introduction of new fields BusinessABN and EmailAddress potentially add value to the report, providing detail for identification and communication with the customer. While the proposed removal of the RebateCode field may also be of value provided the new terms ConcessionCardNumber, FromDate and ToDate are clearly identifiable to customers and government bodies, there would need to be further examination of the impact of these changes.</p> <p>Red and Lumo however do not support the addition of CustomerClassification, AverageDaily Load and Solar as they are duplications of existing Standing Data obtainable by the RoLR. Furthermore the addition of the LifeSupportStatus field is redundant given the presence of the SensitiveLoad field and the fact that regardless of the Life Support status, the RoLR will need to perform a reconciliation to confirm at which sites the LNSP is 'RegistrationOwner', indicating which customers the RoLR would need to contact to confirm Life Support Status at a later date.</p> <p>Red and Lumo also do not support the addition of 'N' <i>Not required</i> as the definition of 'R' <i>Required</i> only places an obligation on the LNSP if they hold the data. If the LNSP does not hold the data, they're not required to provide it in the report.</p>	<p>The IEC notes the respondent's comments and agrees to update the Procedure as per feedback.</p> <p>Table 102-B has been created to separate suspended retailer and LNSP obligations for clarity.</p> <p>RebateCode is not available in the CSDN transaction, it was replaced during POC review.</p> <p>If a RoLR can receive the additional data in one file, it increases the efficiency to create customer accounts and issue customer comms. Also assists in reconciling it with MSATS information. This additional information is being asked to minimise having to undertake NMI discovery transactions and then link these with the customer file.</p>

Section	Question	Participant response	IEC Response
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>Question 2: Do you support the proposed changes with regards to RoLR Procedures table section 104.4?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	Red and Lumo support the amendment to require all service providers to identify and report on all Service Orders raised by the Suspended Retailer for which a ServiceOrderResponse transaction has yet to be provided.	The IEC notes the respondent's support for the change.
2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure	<p>Question 3: Do you support the proposed changes with regards to RoLR Procedures table section 104.5?</p> <p>(Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	Red and Lumo support the requirement for the RoLR to initiate a new service order should the customer still require the service.	The IEC notes the respondent's support for the change.
General	<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>	At this stage Red and Lumo will not be detrimentally impacted by the changes being implemented by 15 May 2023 however there is the potential for unnecessary costs if AEMO proceed with the potential duplication of existing Standing Data.	The IEC notes the respondent's support for the change.

Section	Question	Participant response	IEC Response
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.	No.	The IEC notes the respondent's support for the change.