

# B2B Procedures v3.9 Consultation First Stage

## Participant Response Template

***Participant:*** AGL Energy

***Completion Date:*** 10.07.2024

## 1. Issues Paper Questions

Topic	Question	Comments
2.1.2 Legacy Meter Replacement Plans (LMRP)	Question 1: Do you agree that the new Regulatory Classifications of 'LMRP' should be added to the B2B Procedures? If no, please provide your reasoning and preferred changes.	Yes, AGL strongly support the introduction of a field to clearly identify the various work processes associated with the LMRP obligations. This new Regulatory Classification will be essential in providing accurate reporting of LMRP activities, both internally and externally.
2.1.2 Legacy Meter Replacement Plans (LMRP)	Question 2: Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach.	No.

Topic	Question	Comments
<p>2.1.5 B2B Service Order Response Exception Codes</p>	<p>Question 3: Do you agree that a new allowable value of 'Defect Rectified' should be introduced to the 'Purpose of Request' field to better articulate why the initiator is raising the service order? If no, please provide your reasoning and preferred changes.</p>	<p>AGL supports this introduction of an enumeration to allow MMC/MPs to override any defect logic in place, but AGL recommends changing Defect Rectified to Remediation Advised or Rectification Advised. This is in line with our feedback in AEMO's Metering Services Paper 1 submission, as we believe the same language should be mirrored through defect related processes.</p> <p>Further, AGL specifically notes that it does not support any enumeration which purports to register an unconfirmed status for a site; that is, advice from a customer is neither confirmed nor does it mean that all defects are rectified. It simply advises that the customer (or agent) believes that the defect is rectified.</p> <p>Per our previous comments, AGL would not wish to see the defect flag removed until the new meter is installed.</p>

<p>2.1.5 B2B Service Order Response Exception Codes</p>	<p>Question 4: Do you agree with the proposed changes to the B2B Service Order Response Exception Codes? If no, please provide your reasoning and preferred changes.</p>	<p>AGL strongly supports the use on clearer, targeted exceptions codes, which can be used to drive efficient processes.</p> <p>We do propose some changes to increase that efficiency.</p> <ol style="list-style-type: none"> <li>1. COMMS4A – AGL proposes that if a Comms4D meter has been installed but is not communicating, we would expect this to go through the standard Comms Fault process and not use the Partially Completed code. Partially Completed should be used in situations where the Customer has requested the removal of Comms at the point of install and a 4A meter has been installed. Not Complete reason where customer has refused the communication prior to the meter install to remain.</li> <li>2. Sensitive Load &amp; Life Support – AGL suggests the definition to be updated from “did not de-energise” to “did not complete” as these enumerations are now no longer exclusive to Disconnections and aligns wording with other Not Complete reasons.</li> <li>3. AGL proposes the Relocation of “Obstruction” from the RecipientReference fields relating to “nature-of-defect” into the Service Order Exception Codes and be modified to ‘Obstruction - Customer Action’. This will ensure that defects will all have the same underlying theme of being issues that need to be rectified by an REC. Our view is that communications to customers in the event of an “Obstruction - Customer Action” can mirror those in “No Access – Customer Support” and are not necessarily a defect.</li> <li>4. Adjust the “Shared Supply Point” code to clearly outline that this should not be used in Metering situations and that “Shared Fuse - Scoping</li> </ol>
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		<p>Required” should be used for a failed Meter Exchange for a shared supply. This will avoid potential confusion in use cases for each code.</p> <p>We also believe these new exception codes are valuable and should be implemented, even if the final rule changes in a way that does not expressly require them.</p> <p>These codes will allow for more accurate communications with customers and removes the need to rely on <i>SpecialNotes</i> when a service order is not completed.</p>
<p>2.1.5 B2B Service Order Response Exception Codes</p>	<p>Question 5: Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach</p>	<p>No</p>
<p>2.1.5 B2B Service Order Response Exception Codes</p>	<p>Question 6: Please indicate your preference for sending and receiving Nature-of-defect information, between:</p> <ol style="list-style-type: none"> <li>1) Using modified SAR and SAN as described in this Issues Paper and marked up procedures,</li> <li>2) Introducing two new B2B transactions dedicated to requesting and receiving nature-of-defect information.</li> </ol>	<p>AGL strongly supports the introduction of two new B2B transactions, akin to the PMD/VMD. AGL provides a copy of the draft transactions in this consultation at the end of this response.</p> <p>AGL considers that altering of the SAN/SAR would pose additional challenges into existing processes, as well as substantial time and effort in managing the system logic, compared to a new, simplified transaction, while also complicating the reasons in which a SAN/SAR is being requested/issued.</p> <p>However, the introduction of new transactions would create a clear separation and allow for easy identification on why transactions have been issued/requested and allow for appropriate reporting</p>

<p>2.1.7 Shared Fusing Meter Replacement</p>	<p>Question 7: Do you agree with the proposed procedure changes? If no, please provide your reasoning and preferred changes.</p>	<p>Largely we agree with the proposed procedures, however we have feedback and questions for the B2BWG in the application of the Shared Fusing process.</p> <p><b>Step 0</b> – We would like clarity from participants on the use cases of existing TIGS Service Orders compared to Temporary Isolation - Scoping Required (TISR) &amp; Temporary Isolation One in All In (TIOIAI).</p> <p>In some cases, it may already be known if an NMI is shared supply - would a retailer be expected to raise a TISR and follow the full Shared Fusing process, or does a retailer use the existing TIGS processes? If the existing TIGS processes will remain in effect, confirming the use cases is vital, particularly in scenarios of urgent meter upgrades or hot water concerns. It may be suitable to include guiding notes on each service order to ensure correct use.</p> <p><b>Step 3</b> The proposed changes involve using the MFIN Notes field and concatenation to manage the Coordinated Interruption ID. We recommend the creation of a new field to store this data appropriately and avoid potential confusion regarding use cases of certain fields.</p> <p><b>Step 4</b> We are seeking confirmation that with the introduction of the proposed B2B changes, that any email processes existing today to notify a retailer/MC of an interruption date for a TIGS order would be retired.</p> <p>Like our feedback in Step 3, we believe that a new field should be created for the Coordinated Interruption ID, rather than using the <i>FormNumber</i> field.</p>
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Topic	Question	Comments
		<p>Additionally, we are seeking confirmation that if an interruption is deferred, all open service orders in the Shared Supply Process need to be cancelled and re-raised. This appears to be the expected response as a new interruption ID would be issued, however we would like feedback from participants on this. A new service order would have additional benefit as there may be customer churn in between original dates which would necessitate cancelling of respective service orders.</p>
<p>2.1.7 Shared Fusing Meter Replacement</p>	<p>Question 8: Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach.</p>	<p>Outside feedback already provided, no.</p>
<p>2.2 B002/22 - Alignment of B2B field lengths to B2M Procedures/schema and B004/22 - B2B/B2M field lengths – Address elements</p>	<p>Question 9: Do you agree with the principles that the IEC have applied in determining proposed procedure and schema changes? If no, please provide your reasoning and preferred principles.</p>	<p>AGL supports the principles applied by the IEC in assessing this matter.</p>

Topic	Question	Comments
2.2 B002/22 - Alignment of B2B field lengths to B2M Procedures/schema and B004/22 - B2B/B2M field lengths – Address elements	Question 10: Do you agree with the proposed procedure and schema changes? If no, please provide your reasoning and preferred changes.	AGL supports the proposed procedure and schema changes. AGL notes that any additional or amended enumerations should be managed externally to the Schema to allow easier future management.
2.2 B002/22 - Alignment of B2B field lengths to B2M Procedures/schema and B004/22 - B2B/B2M field lengths – Address elements	Question 11: Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach.	AGL has not identified further options at this time. AGL does note, that until the AEMC releases its final Rule, that the feedback on this submission may need review when that Final Decision is released.
2.3 B006/22 - PERSONNAME definition spec correction	Question 12: Do you agree with the proposed procedure changes? If no, please provide your reasoning and preferred changes.	AGL supports this change.
2.3 B006/22 - PERSONNAME definition spec correction	Question 13: Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach.	AGL has no proposed alternative.



Topic	Question	Comments
2.4 B007/22 - Discrepancy between B2B SO Process and B2B Guide	Question 14: Do you agree with the proposed procedure changes? If no, please provide your reasoning and preferred changes.	AGL supports this change.
2.4 B007/22 - Discrepancy between B2B SO Process and B2B Guide	Question 15: Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach.	AGL has no proposed alternative.
2.5 B011/23 - Amending the definition of Unknown Load Exception Code)	Question 16: Do you agree with the proposed procedure changes? If no, please provide your reasoning and preferred changes.	AGL supports this change.
2.5 B011/23 - Amending the definition of Unknown Load Exception Code)	Question 17: Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach.	AGL has no proposed alternative.

Topic	Question	Comments
2.6 B014/23 - Define obligations for managing inflight service orders sent to metering service providers when a ROLR event is declared.	Question 18: Do you agree with the proposed procedure changes? If no, please provide your reasoning and preferred changes.	AGL supports this change.
2.6 B014/23 - Define obligations for managing inflight service orders sent to metering service providers when a ROLR event is declared.	Question 19: Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach.	AGL has no proposed alternative.
2.12 Questions on proposed changes	Question 20: 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.	

<u>Section</u>	<u>Item</u>	<u>Comment</u>
Table 3 Service Order Types and Subtypes	SSW – Temporary Isolation – Scoping Request	AGL is aware of concerns around the metering party identifying the One In, All in as being able to successfully undertake to replace a meter. AGL accepts that the use of this enumeration indicates that the metering party is proposing that a Scoping Request is the next appropriate step.
Table 3 Service Order Types and Subtypes	SSW – Temporary Isolation – One In All In	AGL recommends that a consistent approach be taken to descriptions across the B2B procedures. For instance, ‘DNSP is requested to temporarily isolate (disconnect) supply to enable a Shared Fusing Meter Replacement Procedure’
General	MC/MP	Generally, AGL recommends that the procedures generally use the term metering party, rather than a specific role, as this changes depending on which businesses are involved.
Table 5 ExceptionCodes Usage Rules	Life Support	AGL proposes that the definition of this Exception Code be changed to ‘Life Support Customer identified at site’. The current definition limits the use of this code to de-energisation but could be equally applicable to most service orders which require an outage such as meter installation etc.

**Appendix – AGL Proposed Defect Transaction**

- R = Required (must be provided if this information is available or has changed).
- O = Optional (may be provided and should be used if provided).
- N = Not required (not required and may be ignored if provided).

**ProvideDefectInformation Data**

(1) Initiators must ensure that the ProvideDefectInformation conforms to the usage, format and definitional rules detailed in table 7:

**T 1 ProvideMeterDataRequest Data**

Field	Format	Use	Definition
<i>InitiatorRole</i>	VarChar(4)	M	The Initiator’s Role requesting the MDFF Data. Participant Role as published in MSATS.
<i>RequestID</i>	VarChar(15)	M	Initiator defined reference, used for reference and tracking. Must be a new (unused) number, unique for the Initiator.
<i>NMI</i>	Char(10)	M	<i>NMI</i> for the <i>connection point</i> missing data.
<i>NMIChecksum</i>	Char(1)	M	<i>NMI</i> Checksum for the <i>connection point</i> missing data.

**VerifyMeterDataRequest Data**

(1) Initiators must ensure that the VerifyMeterDataRequest conforms to the usage, format and definitional rules detailed in table 8:

**U 1 VerifyMeterDataRequest Data**

Field	Format	Use	Definition
<i>InitiatorRole</i>	VarChar(4)	M	The market role of the Initiator querying the MDFF Data. Participant Role as published in MSATS.
<i>RequestID</i>	VarChar(15)	M	Initiator defined reference, used for reference and tracking. Must be a new (unused) number, unique for the Initiator.
<i>NMI</i>	Char(10)	M	<i>NMI</i> for the <i>connection point</i> being queried.
<i>NMIChecksum</i>	Char(1)	M	<i>NMI</i> Checksum for the <i>connection point</i> .

<i>Defect Issue Date</i>	Date	M	The date the defect was issued to the Customer
<i>Identified Defect</i>	VARCHAR (??)	M	The prime defect identified for the site