B2B Procedures v3.9 Consultation First Stage

Participant Response Template

Participant*: PLUS ES*

Completion Date*: 11 Jul 24*

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.	PLUS ES support that 'LMRP' is a required enumeration but not in the *RegClassification* field. We propose the LMRP enumeration is added to the *PurposeofRequest* instead to drive market efficiencies via a standardised process for Retailers and metering parties: • 'New Meter Deployment' currently exists in the *RegClassification* field, which could be used in conjunction with a 'LMRP' *PurposeOfRequest* field. This would follow the current logic used for Retailer Led deployments. i.e.

	Retailer Led Deployment	LMRP deployment
RegClassification	New Meter Deployment	New Meter Deployment
PurposeofRequest	Retailer Led	LMRP

• Adding LMRP in the *RegClassification* field, increases the likelihood of process variations depending on the participant. That is, participants having various pathways to achieve the same outcome – bilateral agreements between metering parties and Retailers on which enumeration should be used to populate *PurposeOfRequest*.

• Further complexity is introduced for use cases, where a meter exchange is a shared fuse and LMRP deployment. In the current proposal, both are enumerations for the *RegClassification* field. Having the LMRP enumeration in the *PurposeOfRequest* allows one to select 'Shared Fuse' in the *RegClassification* field and LMRP in the *PurposeOfRequest*.

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Topic	Question	Comments
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.	Refer to PLUS ES response for Q1.
2.1.5 B2B Service Order Response Exception Codes	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.	PLUS ES supports the inclusion of 'Defect Rectified' to the enumeration list for the *PurposeofRequest* field. A mechanism is required for the Retailer to communicate to the metering party that they have been advised the defect has been remediated. It also advises the metering party that the B2B SO has not been sent in error, allowing the metering party to override any 'defect status' logic they may have implemented to minimise wasted truck visits. It is also preferred that the B2M and B2B procedures maintain consistent terminology. For example, Defect **Rectified** has been proposed for the B2B SO field and the word **Remediation** is proposed in the B2M Issue paper.
2.1.5 B2B Service Order Response Exception Codes	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.	PLUS ES supports in principle that the proposed B2B Service Order Response Exception Codes will drive efficiencies. We do have feedback against the proposed which we have captured in Section 2, of our response.
2.1.5 B2B Service Order Response Exception Codes	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	No alternative options outside the feedback provided in Section 2.

2.1.4 Defect Process	General Feedback	PLUS ES supports that providing the defect type in MSATS and making it available to authorised parties is the most optimum communication mechanism for market participants. A B2B transaction to communicate the defect type does not deliver a streamlined and efficient B2B process, for the following reasons:

PLUS ES supports that providing the defect type in MSATS and making it available to authorised parties is the most optimum communication mechanism for market participants. A B2B transaction to communicate the defect type does not deliver a streamlined and efficient B2B process, for the following reasons:

- MSATS –
  - o Will cater for all scenarios. Once the defect type has been uploaded in MSATS, all associated parties will have access to the defect type. This would cater for FRMP churn and/or MC churn scenarios.
  - o The benefits of expanding the defect process beyond the scope of legacy meters has been discussed and generally agreed. The MSATS solution provides a more robust long term solution.
- B2B –
  - o Where a FRMP churns into a NMI with a defect 'flag' they may require the defect type for more effective communications with their customer. They will need to request the defect type from the MC who identified the defect. The B2B option does not cater for use cases where the MC who identified the defect has churned away from the NMI. They no longer have visibility to the NMI standing data to determine/validate if the requesting party is associated to the NMI. Providing the defect type in this scenario has Privacy Act implications, where compliance interpretations may vary between participants. Some MCs may provide the details others may not.
  - o The proposed SAR/SAN B2B solution to communicate defect type is a minimum viable option which has multipurposed a Hazard field to incorporate defects which *prevent* the installation of a meter. This has resulted in two separate outcomes for this one field, depending on the value. It requires the

Topic	Question	Comments
		recipient of the SAN to build logic against each standard value to differentiate between 'information only' Hazards versus 'action required' Defects.
2.1.4 Defect Process	Question 6: Please indicate your preference for sending and receiving Nature-of-defect information, between: 1) Using modified SAR and SAN as described in this Issues Paper and marked up procedures, 2) Introducing two new B2B transactions dedicated to requesting and receiving nature-of-defect information.	For the reasons provided above, the complexity introduced, and the additional resourcing required to make the SAR/SAN option 'fit for purpose', PLUS ES' preference would be for 2 new B2B transactions.
2.1.7 Shared Fusing Meter Replacement	Question 7: Do you agree with the proposed procedure changes? If no, please provide your reasoning and preferred changes.	PLUS ES generally supports most of the procedure changes. We do not support the following: • Exception code – Shared Fuse-Scoping Required • Requiring the MP to send a reason code of Distribution Works in the PIN, to allow separation from other PINs, so as to prevent the issuing of planned outage notifications to customers. Details have been provided in the relevant sections of our response below.
2.1.7 Shared Fusing Meter Replacement	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.	Refer to feedback provided in the relevant sections of our response below.

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 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..	PLUS ES supports the principles applied by the IEC.
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.	PLUS ES agrees with the proposed procedure and schema changes.
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.	

Topic	Question	Comments
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.	PLUS ES supports the proposed changes as they remove the existing conflicting requirements and clarify that the field cannot be blank. It aligns the 'description' of the fields with what is actually expected.
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.	
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.	Yes
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.	
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.	PLUS ES supports the proposed changes to the description of the Unknown Load Exception Code, as it provides an efficient and consistent option for market participants to use for re-energisation requests, irrespective of the method applied.

Topic	Question	Comments
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.	No.
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.	PLUS ES supports the changes. We have provided general mark-up feedback in document below.
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.	

Topic	Question	Comments
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.	

2. B2B SO Procedures

Section	Item	PLUS ES Feedback
Version Release History	Comments	PLUS ES suggest the comment for v3.9 is amended to be consistent with previous version comments format. For example, Update based on rules changes: • National Electricity Amendment (Accelerating smart meter deployment) Rule 2024; • Rectification of minor typos • Updated definition of Unknown load

Table 3 Service Order Types and Subtypes	SSW – Temporary Isolation – Scoping Request	PLUS ES does not support the proposed 'Description of Use' and proposes the following changes:
		
		• Removal of any referencing to the metering party determining that a One In All In (OIAI) replacement process is required and that it can be successfully completed.
		
		   o The field technician is only able to determine that there is a shared fuse on the NMI assigned to the service order.
		
		   o The draft NER Clause 7.8.10D Shared fusing meter replacement procedure (SFMRP) states:
		
		   Where a Metering Coordinator (Original Metering Coordinator) is aware that repairing, installing, or replacing a metering installation at the connection point of one small customer (First Affected Meter) requires interrupting supply to other small customers, the Original Metering Coordinator must notify the relevant Retailer within 5 business days.
		
		   Interpreting the above definition, a not completed SO due to a shared fuse follows one path. No allowance has been made for a variation in the process. It is our understanding that the DNSP always performs a 'scoping exercise' for an isolation request. Hence, the onus should not be on the metering party advising the Retailer to then advise the DNSP that OIAI scoping is required.
		
		   o A metering party cannot determine that a OIAI process can be successfully completed. Even if it is determined that there is no defect on the metering infrastructure there could be other barriers to a successful completion.
		
		• Removal of the last sentence. This is a process outline beyond the objective of the SSW SO. For consistency, this belongs in a relevant section of the B2B Guide.

		• Proposed wording: Where a metering party has advised the Retailer that a metering installation cannot proceed due to a shared isolation point, the Retailer will send the DNSP this SSW to trigger the next step of the SFMRP.
Table 3 Service Order Types and Subtypes	SSW – Temporary Isolation – One In All In	PLUS ES proposes for a consistent approach that the 'Description' is amended accordingly: DNSP is requested to temporarily isolate (disconnect) supply to enable shared fuse meter replacement/s.
2.6. Scheduled Date and Customer Preferred Date and Time	(a)(ii)	PLUS ES suggests: • 'MC' is replaced by 'metering party' to allow Retailers and metering parties to continue with their bilaterally agreed processes. For example, PLUS ES requires all MSW SO to be sent to the MP participant. Advising that the MSW SO is sent to the MC may have Retailers make unnecessary changes to meet that obligation.
Table 5 ExceptionCodes Usage Rules	Defect	PLUS ES proposes an amendment of the description to allow for any instances where a defect has been identified and the request could not be progressed. We propose the following wording: 'A defect has been identified preventing the requested service from being completed.' i.e. If a DNSP discovers a defect on site and they NOT COMPLETE a SO, they could potentially use the same exception code.
Table 5 ExceptionCodes Usage Rules	Not FRMP	PLUS ES proposes: • Renaming of the Value to 'Invalid FRMP' • Removing the word 'status' from the definition as 'FRMP status' does not mean the same thing as a change of participant. The definition should read: 'Change in FRMP, after service order raised.'
Table 5 ExceptionCodes Usage Rules	No Access – Customer support required	PLUS ES proposes rewording of the definition: 'Customer is required to provide access – e.g indoors, locked environment, vehicle blocking access etc.'

Table 5 ExceptionCodes Usage Rules	No Access – Network support required	PLUS ES proposes: • Typo – 'required' should be lower case in the 'Value' name. • Rewording the value name as it is misleading. Suggest 'No Access – Network assets', as it has been our experience that Networks tend to refer us to the customer when keys to locks are required outside network assets.

Table 5 ExceptionCodes Usage Rules	COMMS4A	PLUS ES proposes the following:
		
		• Value Name – this should align with current terms i.e. MRAM or Type 4A or potentially 'Communications Refused' would be a more apt exception code, as the metering has not been installed.
		
		• PLUS ES does not support the proposal of 'partially completed' responses when the meter exchange has been completed and the comms have not been enabled.
		
		    o This is a change to current BAU for which the effort and downstream impacts would not be commensurate to the benefits of imposing such as change. The change would not be limited to the SO response. It would impact billing and reporting including KPI monitoring.
		
		    o Quantifying the issue – Our data show that <0.2% of our meter exchanges are installed as MRAM due to customer refusal.
		
		    o Retailer is advised of MRAM by the update of the Metering installation type code in MSATS.

Table 5 ExceptionCodes Usage Rules	Weather Event	PLUS ES proposes: • The code is simplified to 'Weather'. • Definition simplified to: 'Work not completed due to weather conditions.'
Table 5 ExceptionCodes Usage Rules	Life Support	PLUS ES proposes to amend the definition of this code 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.

Table 5 ExceptionCodes Usage Rules	Unable To Access	With the introduction of No Access – customer/network support including 'Unable to Access', PLUS ES believes there is an increased likelihood of process variations and costs. For the newly proposed fields to deliver the assumed benefits, this field needs to be deleted. Alternatively, the Retailer could receive any of the 3 exception codes reducing the effectiveness of communicated information.
Table 5 ExceptionCodes Usage Rules	Shared Fuse – Scoping Required	Delivering efficient processes and minimising the cost on participants, PLUS ES does not support the introduction of this code, for the following reasons: • 'Shared Supply Point' code exists and is currently used to advise of shared fuses. Following the receipt of this exception code the Retailer can send a SSW – Temporary Isolation – Scoping Request. • The metering party on site identifies the shared fuse on site for the NMI of the SO. They do not know what scoping is required by the DNSP. • As noted in earlier comments, interpreting draft NER Clause 7.8.10D Shared fusing meter replacement procedure (SFMRP), all shared fuse NOT Complete SO will follow the same process. • The DNSP determines what scoping they will carry out. It is our understanding that DNSPs undertake a scoping exercise on all isolations, irrespective of the type of activity (on-site/desktop).
Table 7 Summary of the management of multiple Service Order and multiple Retailer situations		Table 7 has not been updated to incorporate the newly proposed SSW SOs. PLUS ES recommends the table is reviewed by the B2B Working Group and amended accordingly.
Table 8 New Service Order same Initiator		Table 8 has not been updated to incorporate the newly proposed SSW SOs. PLUS ES recommends the table is reviewed by the B2B Working Group and amended accordingly.

Table 13 Transaction table	*RegClassification*	PLUS ES recommends the following: • The LMRP enumeration should be moved to the *PurposeofRequest* field – as per feedback in Qn1. • The status for MSW Meter Install and MSW Exchange Meter should be updated to M/N. There is general agreement that this fields deliver value and is being used by most Retailers and metering parties. Removing its optional use will drive further operational market efficiencies.
Table 13 Transaction table	*PurposeOfRequest*	PLUS ES recommends the following: • The LMRP enumeration should be moved to the *PurposeOfRequest* field – as per feedback in Qn1. • The status for MSW Install Meter and MSW Exchange Meter should be updated to M/N. There is general agreement that this fields deliver value and is being used by most Retailers and metering parties. Removing its optional use will drive further operational market efficiencies.
Table 13 Transaction table	*FormNumber*	PLUS ES recommends the following: • Amend the proposed inclusion to read: 'Must be populated with Coordinated Interruption ID….' to indicate that it is a mandatory requirement. • The status for SSW – Temporary Isolation – ALL should be updated to R/N to align with the proposed inclusions.

Table 13 Transaction table	*Co- ordinatingContactName*	PLUS ES recommends the following: • Amend the proposed inclusion to align with working group discussions. It was determined that this field would be used to communicate the Original MC (SFMRP) for the SSW Temporary Isolation – Scoping Required, SSW Temporary Isolation – One In All In, MSW Exchange Meter. This requirement should be a mandatory requirement. • The status for SSW – Temporary Isolation – ALL, MSW Install Meter, MSW Exchange Meter should be updated to align with the proposed inclusions.
Table 14 Service Order Transaction	*ExceptionCode*	PLUS ES recommends that the exception code enumerations are removed and replaced by referencing Table 5 ExceptionCodes Usage Rules. This would minimise the administrative effort when updates are required and reduce the risk of omissions/misalignments between this table and Table 5.
Table 14 Service Order Transaction	*RecipientReference*	PLUS ES recommends: • Similar to the above feedback for ExceptionCode field that a reference is made to the enumerated list to minimise the administrative effort when updates are required and reduce the risk of omissions/misalignments between this field and a list of enumerations held in another procedure. • Amending the wording to ensure that the defect type enumerations 'must' be used – not 'can be used', if the objective is for consistent B2B communications. • Incorrect CSDN Procedure table reference – needs to be updated.

3. CSDN Procedures

Section	Item	PLUS ES Feedback
Version Release History	Comments	PLUS ES suggest the comment for v3.9 is amended to be consistent with previous version comments format. i.e. Update based on rules changes: • National Electricity Amendment (Accelerating smart meter deployment) Rule 2024;
2.2 Process Diagrams	Figure 2	Editorial - Figure 2 has been distorted. Working group to ensure the formatting is corrected in final version.
4.8 Site Access Request	(e)	PLUS ES suggests rewording to call out defect type instead of information: 'Where the Initiator requires the defect type related to a MSATS registered defect, they must request this information using the reason code of 'Nature of Defect'.
4.9. Site Access Notification	(e)	PLUS ES does not support the wording of this clause: • As per our feedback in section 1 – 2.1.4 Defect Process– General feedback, the B2B solution has limitations. The current wording does not make allowances for when the Recipient is no longer a current participant on the NMI and they cannot verify if the Initiator is entitled to the information requested.
4.9. Site Access Notification	Another option to cater for FRMP Churn	To cater for a FRMP churn and a possible churn of MC, PLUS ES would like to propose that upon a FRMP churn CR completion, the current MC/P (who identified) the defect sends the Retailer an unsolicited SAN for NMIs with a defect flag= Y. There would be a benefit gains for a consistent approach. Nonetheless, if agreement is not reached at an industry level, clause 4.9(b) would make a participant non-compliant with the B2B Procedures, if they bilaterally agreed with Retailers to send unsolicited SANs. It is proposed that amendments are made to Section 4.9 to enable flexibility in services offered.

Table 7: Data Requirements for SiteAccessRequest	Reason field – Nature of Defect	Discussions between industry participants make no reference to 'Nature of Defect'. The general term used in conversations is Defect Type. For consistency and efficiency, it is proposed that the newly proposed term of **Nature of Defect** is replaced by Defect Type.
Table 7: Data Requirements for SiteAccessRequest	Reason field – Note	PLUS ES recommends that the 'Note' of this field is removed as it is contradictory to clause 4.8 (e).
Table 7: Data Requirements for SiteAccessRequest	Reason – New proposed sentence	PLUS ES propose the following amendments to the wording: 'Where the Initiator is only seeking the Defect Type, they should use the Allowed Value 'Nature of Defect'.
Table 8: Data Requirements for SiteAccessNotification	*AccessDetails*	PLUS ES recommends the 'optional' status of this field is amended to N/M and the sentence '*Optional where this transaction is in response to a SAR requesting 'Nature-of-Defect' details'* is removed. • This sentence is contradictory to the intent of the 'Nature of Defect' Allowed Value. That is, use Nature of Defect if you only want that information.
Table 8: Data Requirements for SiteAccessNotification	*HazardDescription*	PLUS ES recommends that the Defect enumeration list in the procedure is reviewed and reformatted: • The opening paragraph restricts the provisioning of the defect types only where there is SAR reason code of Nature of Defect. Efficiencies would be gained if a participant could request via one SAR all the Site access information including Defect type. Recommend the paragraph is updated to provide the flexibility for participants to bilaterally agree on processes. • The formatting of the Defect Type should align with the Hazard enumerations. • The meaning of each type should be included in reference table for a cleaner look of the data table. Recommend the Enumeration, definition and Retailer action table is reinserted to the CSDN Procedure if this solution is maintained.

Section		It is recommended that the utilisation of a SAR/SAN for defect type communication needs
General		It is recommended that the utilisation of a SAR/SAN for defect type communication needs further consideration for efficiency.

4.   OWN Procedures

Section	Item	PLUS ES Feedback
Version Release History	Comments	PLUS ES suggest the comment for v3.9 is amended to be consistent with previous comments format. i.e. Update based on rules changes: National Electricity Amendment (Accelerating smart meter deployment) Rule 2024;
Table 6 PlannedInterruptionNotification field values	*ReasonForInter*	PLUS ES does not support the proposed change for the following reasons: • It is requiring the metering party to make changes to their business/system processes to enable the Retailer to differentiate whether they need to issue a notification. However, it is the Retailer who is informing the metering party initially that it is a OIAI outage and providing them the date and time. Hence the Retailer should be supressing planned outage notices, as required, without requiring the metering party to make the proposed changes. • A number of Retailers have agreements in place where their MPs issue planned outage notifications to their customers. This proposed change would not deliver any benefit those Retailers.
Table 7 MeterFaultAndIssueNotification field values	*StartDate*	PLUS ES recommends that in the Mandatory definition 'start date' is amended to 'date' for clarity.
Table 7 MeterFaultAndIssueNotification field values	*ReasonForNotice*	Typo – One In All In outage – capitalisation of the 'i' for the word 'in'

Table 7 MeterFaultAndIssueNotification field values	Notes	PLUS ES recommends the OIAI paragraph is reworded for clarity of expected outcomes: • 'Should' to be replaced with 'must' • (Job Number #meters) to be replaced with (Unique ID for the outage – number of NMIs to be exchanged) – we recommend NMIs instead of meters as a NMI could currently have 2 legacy meters and a smart meter replacement could meet the needs with one metering asset. Additionally the '#' should be replaced with a '-' to align with the formatting of the example.
Table 7 MeterFaultAndIssueNotification field values	Notes - Note	PLUS ES does not support the requirement that the original Coordinated Interruption ID should be maintained. If the Coordinated Interruption ID is maintained, there is a risk that a Retailer will not send through an updated MSW SO, resulting in a misalignment of scheduled isolation dates for the same Coordinated Interruption ID. We propose that a new Coordinated Interruption ID is assigned to any rescheduled isolation dates. For efficiency between the 3 participants, Retailers/DNSP/MC, we would like the working group to consider an industry standard process, so all participants are operating with the same expectations, such as a requirement for the DNSP and the Retailer to cancel existing SOs and re-issue the SSW and the MSW SO upon the receipt of a New Coordinated Interruption ID /rescheduled date. Additionally, these details need to be captured but not in the Notes section of the MFIN.

5.   Retailer of Last Resort Procedures

Additional Feedback	Participant Comments
As per our feedback in the B2M Consultation	

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Additional Feedback	Participant Comments
Procedure changes in clause to be mirrored in the process diagrams.	PLUS ES recommends that the High Level Process figures are reviewed and amended to align with the final changes in the Procedure document.
Clause referencing within Part A and B.	PLUS ES recommends that the whole procedure is reviewed and the clause referencing aligned. Amendments made to clauses have not been accurately reflected within the Procedure (Part A and B). Due to the quantity of misalignments, we have made a note that AEMO need to undertake the activity instead of calling out each misalignment. For example, • Clauses have been deleted, yet they are still reference within the document e.g. 7.1(c). • In Part B, we have also identified a change in the formatting of subclauses. E.g In Part A 7.1(c) but in Part B the clause has been formatted as 7.1 c) • Clause numbering has changed, and the document is referencing old clause numbers, e.g. 11.2(k) etc