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B2B Procedures

Draft Report Change Pack

Prepared by: Information Exchange Committee

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1. Notice of Consultation

1.1 B2B Procedure changes

Date of Notice: 18 October 2019

This Notice informs all B2B Parties, relevant B2B Change Parties, AEMO and such other persons who identify themselves to the Information Exchange Committee as interested in the B2B Procedures (**Consulted Persons**) that AEMO is conducting a consultation on B2B Procedures on behalf of the Information Exchange Committee (IEC).

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.

1.2 Matter under consultation

The IEC has developed the changes proposed in this consultation in the interests of clarifying existing B2B Procedures. The changes being consulted on do not require AEMO B2B e-Hub system changes. These changes were recommended to the IEC by the Business-to-Business Working Group (B2B-WG) on behalf of industry.

This document lists the proposed changes to the B2B Procedures as developed, discussed and primarily agreed through consultation with the B2B-WG. The proposed changes under the B2B consultation have an effective date of 3 February 2020.

In summary, the proposed changes are:

- To amend the Miscellaneous Service Order definition in the Service Order Process to clarify that the Miscellaneous Service Order is only to be used when there is bilateral agreement between parties on its use.
- To amend the One Way Notification Process clauses concerning the Notices of Metering Works (NOMW) Removed Reading process to incorporate changes made to the B2B Guide in February 2019.
- To amend the definition of the allowed values for the “LifeSupportStatus” field of the Life Support Notification (LSN) transaction in the Customer and Site Details Notification Process to incorporate changes made to the B2B Guide in February 2019.

A consultation draft of the following list of procedures which the IEC is proposing to amend and develop under this consultation are published with this Notice.

Instrument	New / Amended
Customer Site Details Notification	Amended (Procedure changes)
Service Order	Amended (Procedure changes)
Meter Data Process	Amended (Version control only)
One Way Notification	Amended (Procedure changes)
Technical Delivery Specification	Amended (Version control only)

1.3 Changes between issues paper and draft report

Only one substantive change has been made between the issues paper and draft report; namely, TasNetworks has identified an inconsistency between the Service Order Process and the Technical Specification. The Service Order Process allows the “Co-ordinatingContactName” field to represent either a person’s or a business’s name, whereas the PERSON NAME format that the “Co-ordinatingContactName” field takes is defined in the Technical Specification to only refer to a person’s name. As such, the “Co-ordinatingContactName” field description has been amended to clarify that it may only represent a person’s name.

As per feedback from TasNetworks, several typographical edits have also been corrected in the B2B Procedure: Service Order Process.

1.4 The consultation process

The consultation process is outlined below. Dates are indicative only and subject to change.

Process Stage	Indicative Date
Publication of Draft Report and Determination	18 October 2019
Closing date for submissions in response to the Draft Report	4 November 2019
Publication of Final Report and Determination	17 December 2019

1.5 Invitation to make submissions

The IEC invites written submissions on the matter under consultation, including any alternative or additional proposals you consider may better meet the objectives of this consultation and the national electricity objective in section 7 of the National Electricity Law.

Please identify any parts of your submission that you wish to remain confidential and explain why. The IEC may still publish that information if it does not consider it to be confidential but will consult with you before doing so.

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

1.6 Meetings

In your submission, you may request a meeting with the IEC to discuss the matter under consultation, stating why you consider a meeting is necessary or desirable.

If appropriate, meetings may be held jointly with other Consulted Persons. Subject to confidentiality restrictions, the IEC will generally make details of matters discussed at a meeting available to other Consulted Persons and may publish them.

1.7 Closing Date and Time

Submissions in response to this Notice of Draft Stage of Rules Consultation should be sent by email to NEM.Retailprocedureconsultations@aemo.com.au, to reach AEMO by 5.00pm (Melbourne time) on 4 November 2019.

All submissions must be forwarded in electronic format (both pdf and Word). Please send any queries about this consultation to the same email address.

Submissions received after the closing date and time will not be valid, and the IEC is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if the IEC does not consider your submission.

1.8 Publication

All submissions will be published on AEMO's website, other than confidential content.

2. Background

This document has been prepared to detail proposed B2B Procedure amendments, which have been developed under the IEC's power to manage the ongoing development of B2B Procedures, as contemplated by National Electricity Rules (NER) clause 7.17.7(a)(2). The information provided meets the requirements for changing the B2B Procedures as detailed in Sections 7.17.4 and 8.9 of the National Electricity Rules.

This document also provides information considered by the IEC in determining if a prima facie case exists for amending the B2B Procedures, namely:

- An issues statement (see Section 3).
- A summary of changes to the B2B Procedures, including consideration of the B2B Principles (see Sections 3 and 5).
- An impact statement, including consideration of the B2B Objective (see Section 5).

The proposed changes have been considered and recommended by the IEC's Business-to-Business Working Group (B2B-WG).

The impacted Procedures are the:

- B2B Procedure: Customer and Site Details Notification Process v3.2.
- B2B Procedure: One Way Notification Process v3.2.
- B2B Procedure: Service Order Process v3.2.

3. Scope / Issues Statement

The IEC has developed the changes in this document in the interests of clarifying existing B2B Procedures. The changes being consulted on do not require AEMO B2B e-Hub system changes. These changes were recommended to the IEC by the B2B-WG on behalf of industry.

The members of the B2B-WG are:

Retailers	Distributors	Metering
AGL	AusNet Services	IntelliHUB
EnergyAustralia	Energy Queensland	PlusES
Origin Energy	Endeavour Energy	Vector AMS
Red and Lumo Energy	SA Power Networks	
Simply Energy	TasNetworks	

This document lists the proposed changes to the B2B Procedures as developed, discussed and primarily agreed through consultation with the B2B-WG. The proposed changes under the B2B consultation have an effective date of 3 February 2020.

In summary, the proposed changes are:

- To amend the Miscellaneous Service Order definition in the Service Order Process to clarify that the Miscellaneous Service Order is only to be used when there is bilateral agreement between parties on its use.
- To amend the One Way Notification Process clauses concerning the Notices of Metering Works (NOMW) Removed Reading process to incorporate changes made to the B2B Guide in February 2019.
- To amend the definition of the allowed values for the “LifeSupportStatus” field of the Life Support Notification (LSN) transaction in the Customer and Site Details Notification Process to incorporate changes made to the B2B Guide in February 2019.
- To clarify that the “CoordinatingContactName” field must refer to a contact person, not a contact business, in line with the definition of the PERSON NAME format in the B2B Procedure: Technical Delivery Specification.

Detailed amendments are shown in the draft B2B Procedures published with this report.

4. Consultation Date Plan

The following table details the proposed consultation date plan:

Action	Start Date	End Date
IEC – Initial Meeting Agreement by the IEC that a case for change exists and that consultation should commence.	12 August 2019	
IEC to issue notice of consultation for publication by AEMO	14 August 2019	
Participant submissions to be provided to AEMO.	14 August 2019	19 September 2019
Submission receipt date	19 September 2019	
IEC to consider all valid submissions and prepare the Draft Determination report. This includes the change marked procedures.	19 September 2019	18 October 2019
AEMO to publish Draft Determination consultation (incl. change marked B2B Procedures)	18 October 2019	
Participant submissions to Draft Determination to be provided to AEMO.	18 October 2019	4 November 2019
Submission receipt date	4 November 2019	
IEC to consider all valid submissions and prepare the Final Determination report. This includes the change marked procedures	4 November 2019	17 December 2019
AEMO to publish B2B v3.3 Final Determination	17 December 2019	
B2B Procedure v3.3 effective date	3 February 2020	

5. Impact statement

The proposed changes directly impact the Customer and Site Details Notification Process, the One Way Notification Process, and the Service Order Process. This impact statement sets out an overview of the likely impacts, including benefits and costs, on AEMO and B2B Parties of the proposed amendments to the B2B Procedures.

5.1 B2B Principles

The IEC considers that the B2B Proposal supports each of the B2B Principles as follows:

B2B Principle	Justification
<i>B2B Procedures should provide a uniform approach to B2B Communications in participating jurisdictions.</i>	The proposed B2B Procedures are consistent across participating jurisdictional.
<i>B2B Procedures should detail operational and procedural matters and technical requirements that result in efficient, effective and reliable B2B Communications.</i>	The proposed B2B Procedures clarify the use of existing transactions to ensure that they are used efficiently, effectively, and reliably. The proposed B2B Procedures provide clarity and allow for automation, reducing costs and human error.
<i>B2B Procedures should avoid unreasonable discrimination between B2B Parties.</i>	The proposed B2B Procedures avoid discrimination between B2B Parties, as the proposed changes apply identically across all B2B Parties. Further, the proposed changes to the Miscellaneous Service Order clarify that the transaction can only be used with bilateral agreement which will not permit unreasonable discrimination.
<i>B2B Procedures should protect the confidentiality of commercially sensitive information.</i>	The proposed B2B Procedures preserve the confidentiality of commercially sensitive information.

5.2 B2B Factors

The IEC, on recommendation from the B2B-WG, has determined that the B2B Factors have been achieved for this B2B Proposal as described below.

B2B Factors	Justification
<i>The reasonable costs of compliance by AEMO and B2B Parties with the B2B Procedures compared with the likely benefits from B2B Communications.</i>	The proposed changes are intended to clarify existing B2B Procedures rather than impose new obligations, so there will be minimal costs of compliance. Additionally, increased clarity in the B2B Procedures will improve the ability for B2B parties to comply.
<i>The likely impacts on innovation in and barriers to entry to the markets for services facilitated by advanced meters resulting</i>	The proposed B2B Procedures do not impose barriers to innovation or market entry; instead, they seeking to clarify

<p><i>from changing the existing B2B Procedures.</i></p>	<p>existing B2B Procedures or formalise existing “best practice”.</p>
<p><i>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.</i></p>	<p>There are no system changes required to the B2B e-Hub as a result of the proposed B2B Procedures, so no AEMO implementation timeframe is required. From a business process perspective, the proposed changes only clarify existing B2B Procedures or formalise existing “best practice”, so minimal implementation timeframes should be necessary to make the required changes.</p>

5.3 Benefits

The B2B Proposal clarifies existing obligations (enhancing regulatory transparency) or formalises existing “best practice” from the B2B Guide as an obligation under B2B Procedures. The IEC believes this will improve the efficient and effective use of existing B2B Communications.

5.4 Detriments

To the extent that B2B Parties have already established their business processes and IT systems to be compliant with existing B2B Procedures and “best practice”, there will be minimal costs to implementing the above changes.

6. Submissions

The IEC invites written submissions on the proposed B2B Procedures v3.3.

Consulted parties are requested to identify any information in their submission that is considered to be confidential. The IEC require the consulted party to provide reasons as to why information is regarded as confidential.

6.1 Sending Submissions

Submissions are requested in electronic format using the 'Participant Response Pack Template' published on the AEMO website, as all submissions will be published on the AEMO website.

Submissions must be forwarded to the IEC, C/O AEMO by 5:00pm AEST on 4 November 2019.

Please email submissions, using the template, via email to:

NEM.Retailprocedureconsultations@aemo.com.au

7. B2B Proposal

The proposed changes are detailed within the attached draft procedures published with this report.

Appendix A: Consolidated participant responses to initial consultation

Customer and Site Details Process

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
1	AGL		5.5	Agree	The IEC notes the respondent's support for the proposed change.
2	Energy Queensland		5.5	Energy Queensland supports the proposed change.	The IEC notes the respondent's support for the proposed change.
3	EnergyAustralia		5.5 LifeSupportNotification Data	<p>Suggest minor changes to refer to the Energy Retail Code given ESCV draft determination will align deregistration for no medical confirmation with the NERR process.</p> <p><i>LifeSupportStatus</i></p> <p>“Deregistered - No Medical Confirmation” means the Retailer/Distributor who was initially notified of the life support equipment has attempted to gain a medical confirmation certificate from the customer, but the customer has not obliged. The Retailer/Distributor has completed the necessary steps to formally deregister the life support requirement at the identified premise with the customer as per the NERR and Energy Retail Code (VIC) and the customer did not provide the medical</p>	The IEC has made the suggested changes to clause 5.5.

				confirmation certificate during the deregistration process.	
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One Way Notification Process

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
1	AGL		4.2.4	Agree	The IEC notes the respondent's support for the proposed change.
2	Energy Queensland		4.2.4 Table 9	<p>Energy Queensland seeks clarity on whether the codes NOREAD041 and NOREAD061 are the only codes that can be used in these circumstances.</p> <p>Further, the proposed new text states: <i>"recipient must not reject the transaction on the basis of this field when one of the above codes is provided"</i>.</p> <p>However, if field is not populated (i.e. the code is not provided), is it appropriate for the DNSP to reject the transaction?</p>	<p>The IEC notes that if the register read could not be obtained then only the codes NOREAD041 and NOREAD061 can be provided.</p> <p><i>RemovedMeterReading</i> is mandatory for each <i>RemovedRegister</i>. When a transaction contains information under <i>RemovedRegister</i> but does not contain a <i>RemovedMeterReading</i>, the Recipient may reject the transaction on the basis of Business Event "Invalid Meter Readings – Removed Meter".</p>

Service Order Process

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
1	AGL		2.1	Agree	The IEC notes the respondent's support for the proposed change.
2	TasNetworks		Table 13 (page 36)	<p>Typographical errors – De-Energisation subtypes:</p> <p>Apostrophe prior to word <u>Disconnect</u> to be removed in 1st subtype</p> <p>2nd subtype of <u>Remove Fuse</u> is missing a bullet point</p>	The IEC notes the respondent's comment and will fix the typographical errors.
3	TasNetworks		Table 13 (page 42)	<p>Co-ordinating Contact Name field.</p> <p>The format of this field is that of PERSON NAME, however the definition details state that it is the contact name <u>or business name</u>.</p> <p>As the Service Order Process defines the format as Person Name, TasNetworks suggest deleting the words 'or business name' and 'or entity' from the definition.</p>	The IEC has amended the Co-ordinating Contact Name field accordingly.
4	TasNetworks		2.16.3(b)(iv)	Typographical error - Space required between '2.14' and 'for' in 2 nd line	The IEC notes the respondent's comment and will fix the typographical errors.

5	TasNetworks		2.17(e)	Typographical error – Reference to 2.16.1.1 should be 2.17.1.1	The IEC notes the respondent's comment and will fix the typographical errors.
6	TasNetworks		2.17(f)	Typographical error – Reference to 2.16.1.1 should be 2.17.1.1	The IEC notes the respondent's comment and will fix the typographical errors.