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B2B Procedures v3.3.1 and v3.6 Consultation

17 August 2020

Issues Paper

Proposed improvements regarding Life Support, After-hours Service and Global Settlement.

Notice of consultation

Date of Notice: 17 August 2020

This Notice of First Stage of rules Consultation (Notice) informs all Business-to-Business (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 AEMO is conducting a consultation on B2B Procedures on behalf of the 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. This publication has been prepared using information available at 17 August 2020. Information made available after this date may have been included in this publication where practical.

Matters under consultation

The proposed changes are to amend the:

- Customer and Site Details Notification Process – to clarify various Life Support processes.
- Service Order Process - to reflect EvoEnergy's change of service level for same day re-energisations.
- National Electricity Market (NEM) Retailer of Last Resort (RoLR) Processes Part B - to reflect the implementation of Global Settlement.

Table 1 Summary of proposed changes to the Procedures and Guide

Instrument	New/Amended
Customer Site Details Notification Process	Amended (Procedure v3.6 changes)
Service Order Process	Amended (Procedure v3.3.1 changes)
Meter Data Process	
One Way Notification Process	Amended (version control only)
Technical Delivery Specification	
NEM RoLR Processes Part B	Amended (Procedure changes)

The consultation process

The IEC invites written submissions on the matters under consultation, including any alternative or additional proposals you consider may better meet the objectives of this consultation, 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 22 September 2020 to NEM.Retailprocedureconsultations@aemo.com.au. A response template has been provided on AEMO's website. Please send any queries about this 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. Any late submissions should explain the reason for lateness and the detriment to you if the IEC does not consider it

Please identify any parts of your submission that you wish to remain confidential, explaining 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.

In your submission, you may request a meeting with the IEC to discuss the matters under 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 2 Summary of consultation stages

Process Stage	Date
Publication of Issues Paper	17 August 2020
Closing date for submissions in response to the Issues Paper	22 September 2020
Publication of Draft Report and Determination (Draft Report)	20 October 2020
Closing date for submissions in response to the Draft Report	4 November 2020
Publication of Final Report and Determination (Final Report)	16 December 2020

The IEC developed the proposed changes which are the subject of this determination, in the interests of improving existing B2B Procedures. These changes do not require AEMO B2B e-Hub system changes. These changes were recommended to the IEC by AEMO and the Business-to-Business Working Group (B2B-WG), on behalf of industry.

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1. Background

This Issues Paper has been prepared to detail proposed changes to the B2B Procedures, as well as the B2B Guide.

These proposed changes have been developed under the IEC's power to manage the ongoing development of B2B Procedures as contemplated by clause 7.17.7(a)(2) of the NER. The information provided meets the requirements for changing the B2B Procedures as detailed in sections 7.17.4 and 8.9 of the NER.

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

- An issues statement (see section 1.1).
- A summary of changes to the B2B Procedures, including consideration of the B2B Principles (see sections 1.1 and 2.5).
- A consideration of the B2B factors (see sections 2.5-2.8).

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

The impacted Procedures are the:

- B2B Procedure: Customer and Site Details Notification Process.
- B2B Procedure: Service Order Process.
- B2B Procedure: NEM RoLR Processes Part B.

The B2B Guide is also impacted by the changes proposed in this consultation. The Procedures that will be updated in order to maintain consistent numbering are:

- B2B Procedure: Meter Data Process.
- B2B Procedure: One Way Notification Process.
- B2B Procedure: Technical Delivery Specification.

The B2B Guide will be updated as a consequence of the changes proposed in this consultation. No AEMO system changes are expected to occur as a result of the changes detailed in this paper.

1.1 Issues statement and scope

The IEC has developed the proposed changes in this Issues Paper, to improve the functionality of B2B transactions, as well as to incorporate routine communication between electricity retail market participants into B2B transactions.

These proposed changes were recommended to the IEC by AEMO and the B2B-WG, on behalf of industry.

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	PlusES
Origin Energy	Endeavour Energy	Metering Dynamics

Retailers	Distributors	Metering
Red Energy and Lumo Energy	SA Power Networks	Vector AMS
Simply Energy	TasNetworks	

In summary, the proposed changes are to amend the:

- Customer and Site Details Notification Process (effective 10 November 2021) – to clarify various Life Support processes.
- Service Order Process (effective 1 January 2021) – to reflect EvoEnergy’s change of service level for same day re-energisations.
- NEM RoLR Process Part B (effective 1 May 2022) – to reflect the implementation of Global Settlement.

The other Procedures will be updated for the purpose of version control, in terms of consistent numbering. The detailed amendments are shown in the change-marked technical documents, which are published with this Issues Paper.

The relevant effective dates are as follows:

Table 4 Effective dates of B2B Procedure changes

Procedures	V3.3.1 (effective 1 January 2021)	V3.4 (effective 1 October 2021)	V3.4.1 (effective 1 October 2021)	V3.5 (effective 10 November 2021)	V3.6 (effective 10 November 2021*)	V2.1 (effective 1 May 2022)
Customer and Site Details Notification Process	Amended (version control only)	Consultation completed 22 July 2020. Out of scope for this consultation.	Amended (version control only)	Consultation completed 22 July 2020. Out of scope for this consultation.	Amended (Procedure changes)	N/A (NEM RoLR Processes are not numbered consistently with B2B Procedures)
Service Order Process	Amended (Procedure changes)		Amended (version control only)		Amended (version control only)	
One Way Notification Process			Amended (version control only)		Amended (version control only)	
Technical Delivery Specification	Amended (version control only)		Amended (version control only)		Amended (version control only)	
Meter Data Process			Amended (version control only)		Amended (version control only)	
NEM RoLR Part B	N/A (NEM RoLR Processes are not numbered consistently with B2B Procedures)					

* The effective date of 10 November 2021 for B2B v3.6 is the preference of the majority of B2B-WG members and surveyed market participants. However, this date is contingent on the effective date for B2B v3.5, currently 10 November 2021, but subject to IT resourcing constraints, as well as the 5 Minute Settlement delays. These timing issues are being outworked by AEMO at the time of publication of this Issues Paper.

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 consultation and Issues Paper	17 August 2020	
Participant submissions to be provided to AEMO	17 August 2020	22 September 2020
Closing date for submissions in response to the Issues Paper	22 September 2020	
IEC to consider all valid submissions and prepare the Draft Report and Determination (Draft Report), including change-marked procedures	22 September 2020	20 October 2020
Publication of Draft Report	20 October 2020	
Participant submissions to be provided to AEMO	20 October 2020	4 November 2020
Closing date for submissions in response to the Draft Report	4 November 2020	
IEC to consider all valid submissions and prepare the Final Report and Determination (Final Report), including change-marked procedures	4 November 2020	16 December 2020
Publication of Final Report	16 December 2020	

2. Proposed B2B Changes

2.1 Changes to the Service Order Procedure - After-hours Service Levels

EvoEnergy, the Distribution Network Service Provider (DNSP) in the ACT, is moving towards a change of Service Level, by removing the option of after-hours re-energisations.

The proposed change effective date is 1 January 2021. As this date falls between versions 3.3 and 3.4 of the B2B Procedures, the IEC proposes to introduce the change as version 3.3.1.

This change:

- is to a guidance note to ensure accuracy, rather than a formal Procedure related to any operation of B2B Communications;
- has been reflected in Table 11 of the Service Order Process; and
- does not require any changes to the Procedures that apply to other DNSPs.

This change does not impact:

- B2B communication processes in respect of same day re-energisation; or
- re-energisations after a non-payment, or de-energisations.

2.2 Customer and Site Details Notification Process Changes – life support

The following proposed changes aim to clarify existing processes and avoid the use of manual work to resolve exceptions. This is expected to improve efficiency within the market and accuracy of data by encouraging consistency. The below changes are proposed to be implemented on 10 November 2021.

2.2.1 Registration process owner

The CSDN Process is open to interpretation, which has resulted in different approaches by individual participant, specifically in respect of when participants should nominate themselves as the Registration Process Owner (RPO) within a Life Support Notification.

These different interpretations cause confusion, as the Notification Recipient is expecting the Initiator to nominate itself as RPO in scenarios that are different to those envisaged by the Initiator. For example, some Recipients expect the Initiator to nominate itself as the RPO when the customer contacts the Initiator to register life support, but some Initiators will nominate themselves as the RPO every time they complete the de-registration process.

Accordingly, the IEC proposes to clarify that the Initiator must only nominate itself as the RPO, if the customer has contacted it directly, to inform it of the relevant life support requirements.

Specifically, the following values are proposed in the RegistrationOwner field:

- A value of 'Yes' must only be used when the Initiator has been contacted by the customer directly – with the Initiator to define the relevant scenarios in which contact is defined to have occurred – to inform it of the relevant life support requirements.
- The CSDN Process is proposed to clarify when a value of 'No' must be used.

2.2.2 Reconciliation process

The purpose of reconciliation is to identify issues with the daily life support process, which can be addressed to maintain and improve confidence in respect of life support arrangements.

However, the CSDN Process is open to interpretation, as to when a National Metering Identifier (NMI) should be included in the reconciliation process.

These different interpretations cause confusion, where the scope of NMIs expected by the Recipient of the Notification for reconciliation is different to the Initiator. For example, some Recipients expect NMIs where the Initiator is the current retailer. However, some Initiators include NMIs, where the Initiator is not the current retailer, but may intend to become the current retailer.

Accordingly, the IEC proposes updating the CSDN Process to clarify that a retailer should only include life support NMIs in the reconciliation process, where it is the current retailer.

2.2.3 De-registrations

The CSDN Process is open to interpretation, as to when a de-registration Notification can be sent.

These different interpretations cause confusion where the Recipient expects a Notification in different scenarios to the Initiator. For example, some Recipients expect a Notification when the Initiator has completed the de-registration process. However, some Initiators send Notifications prior to completion.

The IEC proposes to amend the CSDN Process, to clarify that a Notification can only be sent when the de-registration process has been appropriately completed. This change significantly reduces the risk that a customer is removed from a participant's life support register, due to poor B2B communications.

The proposed process is outlined in the change-marked CSDN Procedure. The de-registration date will need to be either the current date, or a past date, not a future date, in order to avoid potential duplication of the Notification.

Further, the Initiator is proposed not to be allowed to send a Notification, prior to successfully completing the process. During the pre-consultation discussions, such a communication was determined to be unnecessary, given that another Notification would need to be sent when the process had been successfully completed, potentially causing confusion. If the customer were to confirm that life support is required as part of the de-registration process, the risk of confusion would be greater.

2.2.4 Life support requests

The meaning of the 'Confirm Life Support' value in the Reason field of the Life Support Request transaction is also interpreted differently by participants.

These different interpretations cause confusion as the Recipient of the Request is taking different actions to those expected by the Initiator. For example, an Initiator may believe that a Reason means that the Recipient should provide a Life Support Notification with their current status of life support. However, some Recipients flag life support on receipt of the Request, then send a Notification back to the Initiator of the Request.

The proposed changes allow the initiator to request the Recipient to send a Notification with their life support information:

- Without the Recipient investigating the status of life support with its customer.
- After the Recipient has investigated the status of life support with its customer.

The proposed changes clarify that:

- The Recipient should not treat this transaction as a notification that there is life support at the premises.
- The value of 'Confirm Life Support' in the 'Reason' field is for the Initiator to request the Recipient to send a Notification with their life support information, without the Recipient investigating the status of life support with its customer.
- 'Other' is a valid reason that can be used, which allows the Initiator to request the Recipient to send a Notification with its life support information, after the Recipient has investigated the status of life support with their customer. Although this is a valid scenario, the expected volume would be low, given that in most cases the Initiator could confirm the status of life support with the customer itself.

2.2.5 Explicit informed consent

The CSDN Process, in Table 9 – which outlines the data requirements for LifeSupportNotification – states that the Initiator must obtain "Explicit Informed Consent" for the use of the email address in this transaction.

However, the use of the email address in this scenario does not fall under the requirements for "explicit informed consent" outlined in Section 38 of the National Energy Retail Law (NERL).

Accordingly, the IEC proposes to change this section, to require "consent" only.

2.3 Changes to the NEM RoLR Processes Part B – Global Settlement

The National Electricity Amendment (Global Settlement and Market Reconciliation) Rule 2018 No. 14 introduced “global settlements” for connection points connected directly to networks of Local Network Service Providers (LNSPs) but retained “settlements by difference” for connection points within Embedded Networks (ENs).

Consequently, the concept of Local Retailer (LR) is:

- removed for all LNSP connection points; and
- retained for all connection points within ENs.

The NEM RoLR Process Part A - MSATS Procedure: RoLR Procedures was amended during the 2019 consultations.

As noted during these consultations, the NEM RoLR Process Part B also needs to be amended, specifically to change references to “LR” to “ENLR” in Section 103.2(a)(ii) and Table 105 CSDN.

These changes:

- are proposed to be included in an updated NEM RoLR Process Part B v2.1;
- are minor, but facilitate benefits for consumers of the Rule change;
- coincide with the implementation of Global Settlement on 1 May 2022.

Global Settlement is not expected to prompt further such procedure or system changes.

2.4 B2B Principles

The IEC considers that the B2B Final 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 B2B Procedures, 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.	The B2B Procedures improve the communications and operational processes between participants through the development of consistent information exchange.
B2B Procedures should avoid unreasonable discrimination between B2B Parties.	The B2B Procedures 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 B2B Procedures do not introduce changes that would compromise the confidentiality of commercially sensitive information.

2.5 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.	The proposed changes will ensure continued compliance by AEMO and B2B Parties with the NER in addition to consistency between B2B Communications and business practices
The likely impacts on innovation in and barriers to entry to the markets for services	The B2B Procedures do not impose barriers to innovation or market entry. They allow participants to streamline their operations, better meet regulatory

facilitated by advanced meters resulting from changing the existing B2B Procedures.

requirements and allow for all relevant information to be contained within the Communications structure to allow for more efficient processes.

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 proposed changes do not require system changes to the B2B e-Hub. Accordingly, no AEMO implementation timeframe is required. From a business process perspective, the amendments only clarify existing B2B Procedures, reflect changed Rules or formalise existing "best practice", so minimal implementation timeframes should be necessary in respect of the required changes.

2.6 Benefits

The proposed changes support the B2B Factors in the following ways:

- Customer and Site Details Notification Process – changes clarify existing obligations and enhance regulatory transparency, providing a uniform approach and detailing operational matters to improve efficiency.
- Service Order Process – changes formalise existing practice by market participants, improving market efficiency.
- NEM RoLR Process Part B – changes to reflect the implementation of Global Settlement are driven by changes to the NER, ensuring compliance.
- B2B Guide – changes to reflect the implementation of WDR are driven by changes to the NER, ensuring compliance.

2.7 Costs

AEMO does not expect the proposed changes will require a schema change or changes to the Low Volume Interface.

Participants should consider the costs, as well as risks, associated with the proposed changes, including:

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

2.8 MSATS Procedures

AEMO has advised that there is no assessed impact to the Market Settlements and Transfers Solution (MSATS) Procedures as a result of this B2B Proposal.

Question 1: 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.

3. B2B Proposal

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

Glossary

This Issues Paper 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
CSDN	Customer and Site Details Notification
DNSP	Distribution Network Service Provider
DRSP	Demand Response Service Provider
EN	Embedded Network
GS	Global Settlement
IEC	Information Exchange Committee
LNSP	Local Network Service Provider
LR	Local Retailer
LS	Life Support
MSATS	Market Settlements and Transfers Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERL	National Energy Retail Law
NMI	National Metering Identifier
PMD	Provide Meter Data
SO	Service Order
Re-en	Re-energisation
RoLR	Retailer of Last Resort
WDR	Wholesale Demand Response