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# B2B Procedures v3.7 Consultation

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**20 September 2021**

Final Report

Proposed Improvements regarding Addressing, Coincident Service Orders, Person Names,  
Unauthorised Connections

# B2B v3.7 Final Report

Date of Notice: 20 September 2021

This Notice of Final Stage of Rules Consultation (Notice) informs all Business-to-Business (B2B) Parties, relevant B2B Change Parties, AEMO and other interested persons (Consulted Persons) that AEMO, on behalf of the Information Exchange Committee (IEC), has concluded its consultation (Consultation) on the changes to the B2B Procedures in respect of addressing, coincident service orders, person names and unauthorised connections (Changes).

This Consultation was conducted under clause 7.17.4 of the National Electricity Rules (NER), in accordance with the Rules consultation requirements in NER 8.9.

## The consultation process

The IEC developed the Changes in the interests of improving the B2B Procedures. The Changes do not entail AEMO B2B e-Hub system changes. However, some participant systems may require changes. The Changes were recommended to the IEC by Endeavour Energy, Origin Energy and the Retailer representatives of the Business-to-Business Working Group (B2B-WG).

**Table 1 Summary of Proposal**

<b>Instrument</b>	<b>New/Amended</b>	<b>Proposed Change</b>
Customer Site Details Notification (CSDN) Process	Amended	To only allow structured site address in Life Support Notification (LSN).
Service Order (SO) Process	Amended	To only allow structured site address, to add Section and Deposited Plan (DP) Number and to include coincident De-Energisation and Re-Energisation SOs for non-regulated service providers.
Technical Delivery Specification	Amended	To allow changes to the Person Name Given and Person Name Title fields.
B2B Guide	Amended	To include a process by which an Unauthorised Connection is detected and disconnected, and to add Section and DP Number.
Meter Data Process	Version alignment	No change except version number.
One Way Notification Process	Version alignment	No change except version number.

**Table 2** Consultation stages

<b>Stage</b>	<b>Date</b>
<b>Publication of Issues Paper</b>	31 May 2021
<b>Closing date for submissions in response to Issues Paper</b>	6 July 2021
<b>Publication of Draft Report and Determination (Draft Report)</b>	3 August 2021
<b>Closing date for submissions in response to Draft Report</b>	18 August 2021
<b>Publication of Final Report and Determination (Final Report)</b>	20 September 2021
<b>B2B Procedures v3.7 effective date</b>	7 November 2022

## Changes between the Issues Paper and Draft Report

Ten submissions were received in response to the Issues Paper, from:

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

The majority of responses were in favour of the Proposal.

## Changes between the Draft Report and Final Report

Four submissions were received in response to the Draft Report, from:

- Energy Queensland.
- Origin Energy.
- PLUS ES.
- Vector Metering.

The majority of responses were in favour of the Proposal.

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# 1. Background

This Final Report summarises the Changes. 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), including in respect of changes under NER 7.17.4.

This Final Report also provides the following information which the IEC has considered :

- The issues statement in respect of the Proposal (see section 1.1).
- The summary of the Changes, including consideration of the B2B Principles (see sections 1.1 and 2.5).
- Consideration of the B2B factors (see section 2.6).

The Changes have been considered and recommended by Distributor, Metering and Retailer representatives of the B2B-WG.

The Changes result in amendments to:

- CSDN Process;
- SO Process;
- Technical Delivery Specification; and
- B2B Guide.

The Changes also result in version alignment of the:

- Meter Data Process; and
- One Way Notification Process.

The Changes are not expected to result in AEMO system changes. However, some participant systems may require changes.

## 1.1 Issues statement and scope

The IEC has developed the Changes in this Final Report 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 Endeavour Energy, Origin Energy and the Retailer representatives of the B2B-WG.

The members of the B2B-WG are as follows:

**Table 3 B2B-WG members by sector**

<b>Retailers</b>	<b>Distributors</b>	<b>Metering</b>
AGL	AusNet Services	IntelliHUB
Alinta Energy	Energy Queensland	PlusES
Origin Energy	Endeavour Energy	Metering Dynamics
Red Energy and Lumo Energy	SA Power Networks	Vector AMS
Simply Energy	TasNetworks	

In summary, the Changes are to:

- CSDN Process – to only allow structured site address in LSN.
- SO Process – to only allow structured site address, to add Section and DP Number and to include coincident De-Energisation and Re-Energisation SOs for non-regulated service providers.
- Technical Delivery Specification – to allow changes to the Person Name Given and Person Name Title fields.
- B2B Guide – to include a process by which an Unauthorised Connection is detected and disconnected, and to add Section and DP Number.

The effective dates of the Changes are as follows:

**Table 4 Change effective dates**

<b>Procedures</b>	<b>V3.6*</b> <b>(effective 10 November 2021)</b>	<b>V3.6.1#</b> <b>(effective 10 November 2021)</b>	<b>V3.6.2##</b> <b>(effective 10 November 2021)</b>	<b>V3.7</b> <b>(effective 7 November 2022)</b>
<b>CSDN Process</b>	Amended (Procedure changes)	Amended (version only)	Amended (version only)	Amended (Procedure changes)
<b>SO Process</b>	Amended (version only)	Amended (Procedure changes)	Amended (Procedure changes)	Amended (Procedure changes)
<b>One Way Notification Process</b>	Amended (version only)	Amended (version only)	Amended (version only)	Amended (version only)
<b>Technical Delivery Specification</b>	Amended (version only)	Amended (version only)	Amended (version only)	Amended (Procedure changes)
<b>Meter Data Process</b>	Amended (version only)	Amended (version only)	Amended (version only)	Amended (version only)

\* Previously consulted on: <https://aemo.com.au/en/consultations/current-and-closed-consultations/b2bv36>

# Previously consulted on: <https://aemo.com.au/consultations/current-and-closed-consultations/b2b-v361-minor-amendment>

## Previously consulted on: <https://aemo.com.au/consultations/current-and-closed-consultations/b2b-v362-minor-amendment>

## 1.2 Consultation plan

The Consultation plan was as follows:

**Table 5 Consultation Plan**

<b>Stage</b>	<b>Start Date</b>	<b>End Date</b>
Publication of Notice of Consultation and Issues Paper	31 May 2021	
Participant submissions provided to AEMO	31 May 2021	6 July 2021
Closing date for submissions in response to Issues Paper	6 July 2021	
IEC consideration of all valid submissions and preparation of Draft Report, including change-marked Procedures	6 July 2021	3 August 2021
Publication of Draft Report	3 August 2021	
Participant submissions provided to AEMO	3 August 2021	18 August 2021
Closing date for submissions in response to Draft Report	18 August 2021	
IEC consideration of all valid submissions and preparation of Final Report, including change-marked Procedures	18 August 2021	20 September 2021
Publication of Final Report	20 September 2021	

# 2. Changes

## 2.1 Address Fields

The following Changes are focused on delivering uniformity and process efficiencies in B2B communications for address fields, resulting in more timely services for electricity customers at the time of NMI allocation.

### 2.1.1 Remove Unstructured Site Address

#### **Issue summary and submissions**

The Change is to obligate participants to provide site address information in the structured format, by removing the ability of participants to provide site address information in the unstructured format.

The Change aligns with AEMO's final determination on the MSATS Standing Data Review published on 7 September 2020. Among the changes, site address information in the structured format will change from being Optional to being:

- Required from 14 March 2022.
- Mandatory from 7 November 2022.

Accordingly:

- Site address information in the unstructured format will no longer be allowed in MSATS from 7 November 2022.
- Any existing NMI with site address information in the unstructured format must be converted to the structured format by 7 November 2022.

For consistency and efficiency, the B2B Procedures will also remove the unstructured site address information.

The Change:

- Involves updating the B2B Procedures, to clarify when site address information in the structured format is required.
- Has been reflected in LSN of the CSDN Process, as well as Table 13 and Table 14 of the Service Order Process.
- Does not impact the postal address information, which should continue to have the option to be in the unstructured format.

In response to the Issues Paper:

- All respondents except Origin Energy supported the Change. Vector Metering also noted that the only time an address is used in a SO is during a "Allocate NMI" SO from the retailer to the DNSP. Otherwise, NMI is the identifying key and details are sourced from MSATS.
- Origin Energy sought clarity on the conversion of unstructured to structured format by 7 November 2022. Origin Energy queried whether there will be attempts to discover the structured address for integrity purposes, or whether the current data will be lifted into a structured format. Origin Energy also noted the ability to bi-laterally agree on reconciling the address information with distributors, to ensure data integrity, thereby achieving the benefit of the Change.
- All respondents except Red and Lumo supported the proposed implementation date of 7 November 2022.
- Red and Lumo:



- Did not support the proposed implementation date of 7 November 2022, but instead, supported the Change becoming effective as of the second quarter of 2023 or 7 November 2022, with a 6-month transition period.
- Noted the clean-up of the structured address in MSATS and removal of the unstructured address must be completed by 7 November 2022, as part of the work being undertaken through the MSDR.
- Preferred a transition period from the 7 November 2022 of at least 6 months, to ensure that the MSATS address changes have been appropriately completed and reflected in retailer systems.
- Jemena noted that:
  - The two structured address format (B2B vs B2M) defeats the purpose of accuracy of information and streamlined development, querying whether AEMO can synchronise Structured Address Format in Business-to-Market (B2M) and B2B.
  - The application of the Change to Structured Address in LSN, but not in Customer Details Notification (CDN).

In response to the Draft Report, Origin Energy noted and supported the Change.

### **IEC assessment and conclusion**

The IEC did not receive any objections to the Change. The IEC's conclusion is to make the Change as summarised in this Final Report and described in the CSDN Process and SO Process.

## **2.1.2 Add Section and Deposited Plan (DP) Number**

### **Issue summary and submissions**

The Change is to enable the Section and DP Number to be communicated via defined fields in the B2B transactions, especially in respect of the Allocate NMI Service Order. The Section and DP Number is only required in NSW and ACT. The Proposal is to use existing fields to define Section and DP Number for the Allocate NMI Service Order.

The Proposal included three options for the IEC to consider on the provision of these fields:

- Create new fields to represent Section and DP Number for the Allocate NMI SO.
- Create new fields to represent Section and DP Number in the ADDRESS format definition.
- Use existing fields to define Section and DP Number for the Allocate NMI SO.

Given that Section and DP Number is only required for NSW and ACT, a solution is preferred which has minimal impact on participants which operate in other jurisdictions. Accordingly, the Proposal is to use existing fields to define Section and DP Number for the Allocate NMI SO.

The Change:

- Involves updating the definition of FormReference and FormNumber fields, to indicate that they will be used for DP Number and Section Number in NSW and ACT.
- Has been reflected in Table 13 of the Service Order Process.
- Does not require any changes to the Procedures which apply to DNSPs in other jurisdictions.

In response to the Issues Paper:

- PLUS ES noted that they will not use these fields and sought clarification that DP referred to Deposit Plan and not Delivery Point.
- AGL, Origin Energy and TasNetworks supported the Change.
- TasNetworks noted that Section Number and DP Number is not used in Tasmania.

- CitiPower/Powercor, Jemena and United Energy’s responses indicated that the Change did not apply to them.
- Red and Lumo:
  - Did not support the Change.
  - Indicated their preference to create new fields to represent Section and DP Number in the ADDRESS format definition.
  - Stated that repurposing existing fields introduces an element of complexity in both system build and human entry.
- Vector Metering responded as “other”, noting that as the fields are used during an “Allocate NMI” SOR from the retailer to the DNSP, it is up to them to agree. In principle, Vector Metering considered, the re-purposing of fields is not best practice.
- All respondents either supported the implementation date of 7 November 2022 or indicated that the Change did not apply to them.

In response to the Draft Report, Origin Energy supported the Change.

### **IEC assessment and conclusion**

The IEC did not receive any objections to the Change as outlined in the Draft Report. The IEC’s conclusion is to make the Change as summarised in this Final Report and described in the SO Process and B2B Guide.

## **2.2 Changes to Person Name Given and Person Name Title fields**

### **Issue summary and submissions**

The Change is focused on delivering uniformity and process efficiencies in B2B communications for person name fields, to reflect current naming conventions, as well as to align with the current Australian Standard AS 4590.1:2017 Amd 1:2020.

In turn, the Change will lead to appropriate naming preferences being used in customer correspondence, thereby delivering an improved customer experience.

The Change allows Retailers to populate:

- PersonNameTitle field with a null value to accommodate the customer’s request to not use a name title, or to use the more recently created title types (for example, Mx).
- PersonNameGiven field with a null value to accommodate the customer’s request (for example, where a customer only has one name, rather than a first name and a last name).

The Change has been reflected in Table 1 of the Technical Delivery Specification. Market Participants will be required to update their systems, to allow for the additional values and a null value.

In response to the Issues Paper:

- All respondents except PLUS ES and TasNetworks supported the Change.
- PLUS ES questioned the benefit realisation, given participants have currently built their own system logic to overcome the issue.
- TasNetworks:
  - Noted a potential benefit of aligning the use of the PersonName fields to the current Australian Standard. The Change may impose a cost individually and collectively across industry participants, albeit a reasonable cost, to implement changes (if required) to their respective systems.

- Questioned the cost of facilitating the Change, without some analysis of the true benefit which it would provide.
- Questioned whether consideration has been given to deferring the Change, until such time as other B2B changes may be required which provide more broader customer or industry benefit.
- All respondents except TasNetworks supported the implementation date of 7 November 2022. Red and Lumo noted that they will not support an implementation date before 7 November 2022. CitiPower/Powercor supported the Change becoming effective in line with the MSDR changes.

In response to the Draft Report, Origin Energy supported the Change.

### **IEC assessment and conclusion**

The IEC did not receive any objections to the Change as outlined in the Draft Report. The IEC's conclusion is to make the Change as summarised in this Final Report and described in the Technical Delivery Specification.

## **2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses**

### **Issue summary and submissions**

During the development of the Notified Party processes for multiple service providers, it was identified that there was less clarity for non-regulated metering businesses in respect of the management of coincident de-energisation and re-energisation service orders.

The new section 2.18 of the SO Process:

- Was included to specifically cover the case where a non-regulated business received a de-energisation request after a re-energisation request within the five-business day window for coincident services.
- Contains the concept of avoiding supply interruptions for the customer to the extent possible, mirroring the requirements which are placed on the regulated DNSPs in similar circumstances.

In response to the Issues Paper:

- All respondents except PLUS ES and Vector Metering supported the Change.
- PLUS ES agreed with the Change for non-regulated MPBs, but considered that the Change will deliver no additional value to the industry when the SO Process becomes effective. Non-regulated MPBs which currently offer remote energisation services have already implemented coincident checking of energisation service orders which they receive. The Change caters to a 'siloed' participant approach, in a subset of use cases. However, the Change does not address the complications in respect of two separate entities which are potentially requested to perform energisation services, thereby increasing the likelihood that a customer will be left off supply.
- Vector Metering considered that the Change places obligations on what businesses do on the receipt of a transaction. The B2B principle is to define the transactions that flow between businesses, instead of the triggers inside a business. The Initiators and Recipients should be free to agree as to the manner in which transactions are to be used. Vector Metering questioned whether the IEC has the remit to place such obligations on businesses. As already demonstrated, the major Metering Coordinators (MCs) have built mechanisms, as part of the remote re-energisation/de-energisation offering, to manage coincident SOs, in the absence of this obligation. While DNSPs want regulation to define what they will do, competitive MC's do not. Accordingly, Vector Metering considered that enshrining this in regulation is unnecessary.
- All respondents except PLUS ES either supported the implementation date of 7 November 2022 or indicated that the Change did not apply to them.

- PLUS ES noted that it has already implemented the proposed obligations, cognisant of the potential industry impacts of the introduction of remote energisations. PLUS ES further mitigates instances where a customer may be left off supply, by performing coincident checking of Notified Party Notification (NPN), when received.
- Red and Lumo noted that the question should be in respect of the Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses. Red and Lumo also supported an implementation date earlier than 7 November 2022.

In response to the Draft Report:

- PLUS ES supported the objective of the section 2.18(d) and noted the generic obligations it places on a contestable MPB. PLUS ES proposed amendments that either allow the contestable MPB the flexibility to action the Service Orders or divide the clause to cover respectively the remote energisation and the requirement of a physical site visit (e.g. for *small customer metering installation* – Type 4A (MRAM) metering).
- Vector Metering noted that section 2.18(d) reflects the current practice employed by DNSPs for physical work and it prohibits a short turnaround between de-energisation and re-energisation and hence it should be removed.

### IEC assessment and conclusion

The SO Process is published by AEMO in accordance with NER 7.17.3. For each B2B communication between B2B Parties, the SO Process must specify the required transaction data inputs and outputs, as well as business process flows and related timing requirements, in respect of the defined services in the SOs. Accordingly, the Participants are enabled to:

- Request SOs;
- Receive confirmation that the work will or will not be attempted or undertaken; and
- Subsequently, receive confirmation the work has or has not been completed as requested.

In this regard, where the Initiator has sent multiple SOs to the MPB as the Recipient, the specifications in section 2.18 reflect the principles that:

- The Customer's interests take priority, that is, to ensure that power is not disrupted; and
- Each Initiator must use reasonable endeavours to minimise sending a Recipient multiple conflicting ServiceOrderRequests for a single NMI.

Specifically, section 2.18 appropriately requires the transaction between the two businesses, whereby the Recipient must send the Initiator a ServiceOrderResponse transaction with:

- The ServiceOrderStatus of 'Not Complete'; and
- The ExceptionCode of "De-energisation Not Completed Due To A Re-energisation."

Based on the feedback to Draft Report, the IEC concludes that the proposed section 2.18(d) will not proceed to enable the flexibility available for the contestable MPBs.

The Change will become effective on 7 November 2022.

The IEC notes the suggestion of PLUS ES in respect of NPNs.

## 2.4 Unauthorised Connection Process

### Issue summary and submissions

The Change:

- Includes the mapping of the process by which an Unauthorised Connection is detected, as well as the steps which each participant may take.

- Aims to provide clarity in respect of the steps which are performed following the identification of an unauthorised connection.
- Does not change any current participant processes.
- Has been included in the B2B Guide under the title 'Unauthorised Connection – RB/DB Process'.

In response to the Issues Paper:

- All respondents except PLUS ES, TasNetworks and Vector Metering supported the inclusion of the relevant process flow.
- PLUS ES agreed that while actions need to be taken, this process should not be in the B2B Guide. PLUS ES also noted that obligations should be identified and/or enhanced to achieve the objective, then included in the relevant AEMO procedures, including the Service Level Procedures.
- TasNetworks did not perceive any benefit in including the proposed process flow. TasNetworks considered that there is no context or explanation which supports the diagram. Participants should have existing processes to manage unauthorised connections, given that the relevant issues are not new. Further, the process for managing such instances may be individual to each participant, based on their own internal processes.
- Vector Metering noted that the process should start with the DNSP detecting actual interval data (zero or non-zero) on a Deenergised NMI, then making the NMI active. The Retailer detects the NMI status change, then acts to deenergise the site, if required. Accordingly, the MDP is not needed in this flow.
- All respondents except TasNetworks agreed with the implementation date of 7 November 2022. AGL noted that the Change is simply a change to the Guide which reflects current business practice. Accordingly, AGL considered that there should be no issues (except perhaps increased understanding) by the Change being re-released earlier than 7 November 2022. Red and Lumo noted that the Change is not intended to be a change from current practice, but instead simply a clarification of the steps which are performed. Red and Lumo supported an implementation date of 7 November 2022, or much earlier.
- TasNetworks did not support the implementation date, given that it did not support the inclusion of the proposed process flow.

In response to the Draft Report:

- Energy Queensland noted that the proposed process flow does not respond to scenarios where there is minor consumption. Energy Queensland also noted that Queensland regulations require a visual inspection to be undertaken for re-energisation following de-energisation.
- PLUS ES proposed in clause 6.1.5 to replace the word 'Unauthorised' or make the definition of 'Unauthorised Connection' concise and accurate.
- PLUS ES also noted that the precursor conditions in the clause 6.1.5 process flow should include a condition where actual meter data is received by the Retailer.

## **IEC assessment and conclusion**

The IEC considers that:

- The Change is to clarify where illegal reconnections happen and how they may be processed.
- The process flow is intended to guide participants on the high-level steps, not to influence the underlying steps which are performed by each relevant business.
- Clause 6.1.5 should include a note to indicate the variations in the process among jurisdictions.
- Clause 6.1.5 will have the word 'Unauthorised' removed from the statement 'Where this has been done by a party other than the network (unauthorised), or by the network and this has not been recorded, the status in MSATs will indicate that the NMI is still de-energised'.

- The precursor conditions in the clause 6.1.5 process flow will be updated to remove existing condition 1 and add a new condition 'The MDP records and publishes actual consumption'.
- The process will be updated to better reflect the intent and context.
- The Change will be effective 7 November 2022.

## 2.5 B2B Principles

The IEC considers that the 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.

## 2.6 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.	The 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 facilitated by advanced meters resulting from changing the existing B2B Procedures.	The B2B Procedures do not impose barriers to innovation or market entry. They allow participants to streamline their operations, better meet regulatory 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 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.

## 2.7 Benefits

The Changes support the B2B Factors in the following ways:

- CSDN Process – the Changes increase customer confidence that the industry has a consistent and efficient end to end process for communicating site address information.
- SO Process – the Changes increase customers confidence that the industry has a consistent and efficient end to end process for communicating site address information, Section and DP Number information.

- Technical Delivery Specification – the Changes aim to reflect customer confidence that Retailers, Distributors, and other service providers are recognising their preferences.
- B2B Guide – the Changes clarify the process for enabling detection and removal of unauthorised connection and the addition of Section and DP Number information.

## 2.8 Costs

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

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

- The costs and resources which 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.

## 2.9 MSATS Procedures

AEMO has advised that the Changes have been assessed as not impacting the MSATS Procedures.

# 3. B2B Changes

The Changes are detailed in the attached final procedures, which are published with this Final Report.



# 4. Glossary

This Final Report uses many terms which have meanings that are defined in NER. The NER meanings are adopted, unless otherwise specified.

<b>Term</b>	<b>Definition</b>
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
B2B	Business-to-Business
B2B-WG	Business-to-Business Working Group
B2M	Business-to-Market
CDN	Customer Details Notification
CSDN	Customer and Site Details Notification
DNSP	Distribution Network Service Provider
DP	Deposited Plan
FRMP	Financially Responsible Market Participant
IEC	Information Exchange Committee
LNSP	Local Network Service Provider
LSN	Life Support Notification
MC	Metering Coordinator
MRAM	small customer metering installation – Type 4A
MSATS	Market Settlements and Transfers Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERL	National Energy Retail Law
NMI	National Metering Identifier
NPN	Notified Party Notification
SO	Service Order

# 5. Summary of submissions in response to Draft Report

## 5.1 Customer and Site Details Process

Participant Name	Old Clause No	New Clause No	Comments	IEC response
Energy Queensland		5.5 Table 9: Data Requirements for LifeSupportNotification	No comment	
Origin Energy		5.5 - Table 9 Data Requirements for LifeSupportNotification	Origin notes and supports the suggested changes relating updates to Structured Address	The IEC notes the respondent's support for the change.
PLUS ES			n/a	

## 5.2 Service Order Process

Participant Name	Old Clause No	New Clause No	Comments	IEC response
Energy Queensland		2.18 Multiple Service Orders sent to the MPB	No comment	

Participant Name	Old Clause No	New Clause No	Comments	IEC response
Energy Queensland		4.1 Service Order Request Transaction Data	No comment	
Energy Queensland		4.2 ServiceOrderResponse Transaction Data. Table 14 Service Order Transaction	No comment	
Origin Energy		2.18 Multiple Service Orders sent to the MPB	Origin notes and supports the additions relating to Multiple Service Orders sent to the MPB	The IEC notes the respondent's support for the change.
Origin Energy		4.1 Table 13 Service Order Transaction	Origin notes and supports the changes relating updates to Structured Address	The IEC notes the respondent's support for the change.
Origin Energy		4.1 Table 13 Service Order Transaction	Origin notes and supports the changes to require deposited plan for NSW and ACT relevant fields	The IEC notes the respondent's support for the change.
Origin Energy		4.2 Table 14 Service Order Transaction	Origin notes and supports the changes relating updates to Structured Address	The IEC notes the respondent's support for the change.
PLUS ES		2.18 (d)	<p>PLUS ES supports the objective of what this clause is seeking to achieve however objects to the wording of the clause and the restrictions it imposes on a contestable MPB.</p> <p>The majority of the contestable MPB's metering is remote enabled. Remote connectivity implies the ability to enable a change in the energisation status without visiting the metering installation and could be accomplished almost near real time. A contestable MPB may also have some non-</p>	The IEC notes the respondent's comments and agrees to remove the new clause 2.18(d) to enable the flexibility available for contestable MPBs.

Participant Name	Old Clause No	New Clause No	Comments	IEC response
			<p>remote enabled metering installations but this volume is very minute. i.e MRAM metering.</p> <p>It is not equitable to place a generic obligation on the contestable MPB, which has been defined by the practices of regulated businesses, as their operational models are different.</p> <p>Referencing the above PLUS ES proposes that the clause is amended to:</p> <ul style="list-style-type: none"> <li>o Allow the contestable MPB the flexibility to action the Service Orders in accordance to their processes, capabilities, and bilateral agreements with the requesting party, whilst mitigating the customer being left off supply or</li> <li>o Alternatively, the clause is divided into 2 separate clauses: one for energisation effected via remote services and one where the action requires a physical site visit, i.e. MRAM metering.</li> </ul> <p>For example, a Re-en SO has been received on a Monday for the Friday of that week and within the same day a De-en SO is received to be actioned on the Tuesday of that same week. The metering installation is remote enabled. There is no reason why the contestable MPB should have a regulated process to cancel the De-en SO. They should have the option to action and complete the SO appropriately and then continue to action the Re-en SO for Friday. This is one of the benefits remote enabled metering can deliver.</p>	

Participant Name	Old Clause No	New Clause No	Comments	IEC response
Vector Metering		2.18(d)	This clause reflects the current practise employed by Networks for physical work. It is driven by the Networks not wanting to visit a site in quick succession to reverse a de-energisation. This is not relevant when the service is performed remotely. It is perfectly acceptable for a FRMP to schedule their NMI to be remotely de-energised on one day and then for the incoming retailer to have it remotely re-energised a day or two later. The period between de-energisation and re-energisation could be as short as a few hours. This clause prohibits this, limits innovation and should be removed.	The IEC notes the respondent's comments and agrees to remove the new clause 2.18(d) to enable the flexibility available for contestable MPBs.

### 5.3 Technical Delivery Specification

Participant Name	Old Clause No	New Clause No	Comments	IEC response
Energy Queensland		3. Field Format Conventions, 3.5 PERSONNAME definition	No comment	
Origin Energy		3.5 PERSONNAME definition – Table 5	Origin notes and supports the changes relating to PersonName Title and PersonNameGiven fields	The IEC notes the respondent's support for the change.
PLUS ES			n/a	

## 5.4 Other Procedures & B2B guide

Participant Name	Old Clause No	New Clause No	Comments	IEC response
Energy Queensland		6.1.5 - Outcomes following an Unauthorised Connection	<p>This proposed workflow does not consider scenarios where there is minor consumption. As the LNSP, we may request the MPB to make the readings zero in these cases, but would not change the NMI status and would still require a re-energisation before making the NMI active. However, where there are obvious large amounts of consumption we would be more inclined to change the NMI status to active.</p> <p>It should be noted that Queensland regulations require a visual inspection to be undertaken for re-energisation following de-energisation. As such, Queensland DNSPs would be unable to change a NMI status to active without a visual inspection prior to re-energisation.</p>	The IEC notes respondent's comments and agrees to add a note indicating variation in the process between jurisdictions.
Energy Queensland		Appendix 1 - Service Order Paperwork Reference Table	No comment	
Origin Energy		6.1.5 Outcomes following Unauthorised Connection	Origin notes and supports the addition of the generic process for sites to be added for unauthorised connections	The IEC notes the respondent's support for the change.

Participant Name	Old Clause No	New Clause No	Comments	IEC response
PLUS ES		6.1.5	<p>PLUS ES proposes a review of how the intent of this section is defined.</p> <p>Either the word 'Unauthorised' needs to be replaced or the definition of 'Unauthorised connection' needs to be defined concisely and accurately.</p> <p>For example, the below wording imply that the connection is unauthorised which is not accurate.</p> <p><i>Where this has been done by a party other than the network (unauthorised), or by the network and this has not been recorded, the status in MSATs will indicate that the NMI is still de-energised.</i></p> <p>An ASP could re-energise the NMI - authorised party, requested by the customer hence, authorised connection. Also, the Network not updating the NMI status to A after re-energisation does not categorise the re-energisation as unauthorised.</p>	The IEC notes respondent's comments and agrees to remove the word 'Unauthorised' from the statement in blue.
PLUS ES		6.1.5 – Process flow	<p>PLUS ES suggests the following:</p> <ul style="list-style-type: none"> <li>• The pre cursor/trigger should be NMI status = D and actual meter data is received by Participants.</li> <li>• The following step by the Retailer is to "Determine if Energisation was Unauthorised" and they cannot do that without trying to engage the customer and/or DB. i.e.: <ul style="list-style-type: none"> <li>○ An incoming Retailer may have requested for the energisation and DB forgot to update the NMI status or NMI status hasn't been updated due to the 5 bus days timeframe</li> </ul> </li> </ul> <p>An ASP has connected the customer's supply and has not submitted the NOSW or the DB has not actioned the NOSW</p>	The IEC notes respondent's comments and agrees to remove existing pre-cursor condition 1 and add a new condition 'The MDP records and publishes actual consumption'.