

## B2B Procedures

- RoLR Procedures Part B

### CONSULTATION – First Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant: PLUS ES***

***Completion Date: 31 Mar 2023***

# Table of Contents

1. Issues Paper Questions..... 3

# 1. Issues Paper Questions

Topic	Question	Comments
<p>2.1 Update of 'Table 102 A: Customer and Site Details to Provide to RoLR'</p>	<p>Question 1: Do you support the proposed changes with regards to RoLR Procedures table 102-A?  (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")</p>	<p>Other –  PLUS ES has the following comments for consideration:</p> <ul style="list-style-type: none"> <li>• <b>Customer Classification field:</b> The description calls for Commercial or Industrial, yet the enumeration is LARGE. Either define the LARGE enumeration in the description or amend the LARGE enumeration to COMMERCIAL/INDUSTRIAL (or an abbreviation of this to fit within the 20 Characters, i.e. C&amp;I).</li> <li>• <b>HouseNumberToSuffix:</b> Propose to include this new field in the table as it will be available on 30 May 23.</li> <li>• Recommend including a PostalNumberToSuffix</li> <li>• <b>Postal Unstructured address:</b> PLUS ES acknowledges the advantages and consistency of structured addresses. In a past review of B2B Technical Delivery Specifications it was determined that unstructured addresses would still be relevant for post. If this is still a valid requirement, then the PostalUnstrutedAddress fields should remain in the table. Alternatively, the B2B Working Group should determine if references of unstructured addresses should remain/ are required in B2B procedures/documents.</li> </ul>

<p>2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure</p>	<p>Question 2: Do you support the proposed changes with regards to RoLR Procedures table section 104.4?  (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)</p>	<p>PLUS ES does not support the proposed changes to section 104.4, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Adding the MC, MP, MDP to this section is not sufficient and the clauses need to be reviewed to ensure they are current, valid and allow for the operational processes and contestable model for participants of smart metering. i.e. Remote services etc</li> <li>• Some clauses are repetitive in nature and can be streamlined for efficiency, even for the LNSP participant.</li> <li>• Some requirements do not add value to the process and need to be validated.</li> </ul> <p>Some examples of specific feedback to the proposed mark ups:</p> <ul style="list-style-type: none"> <li>• The section title could be more succinct.</li> <li>• Avoiding the ambiguity created by generic phrasing such as ‘other relevant participants’, by assigning the procedural obligation on <u>specific</u> parties.</li> <li>• Clause (b) in part is not applicable to parties other than the LNSP.</li> <li>• Clause (c) does not allow for remote services.</li> <li>• Clause (e) may not be applicable to the contestable service provider.</li> <li>• Clause (f) – is there a current requirement for 15 bus days, process could be more efficient.</li> <li>• Clause (g) is an almost replica of clause (d)</li> </ul> <p>PLUS ES recommends the following and hence proposes that the changes to this section <b>should not</b> proceed via an expedited consultation.</p> <ul style="list-style-type: none"> <li>• A review is undertaken of the E2E B2B NEM RoLR procedure (Part A &amp; B) to ensure currency and efficiency.</li> <li>• If the proposed changes were to proceed additional analysis is required by the B2B Working group to ensure currency and efficiency. That is,</li> </ul>
--	---	--

		<p>creating a new section or reviewing the current section and making appropriate amendments. It is not fair and equitable to place redundant or LNSP regulated process driven obligations on contestable parties.</p> <p>For example, PLUS ES will act on <b>all</b> inflight service orders and reject any new SOs, upon notification of a RoLR event, and provide a report to the RoLR on Day 1. No further reporting would be required.</p>
<p>2.2 Update of in-text referencing errors and obligations in section 104.4 and 104.5 of the RoLR procedure</p>	<p>Question 3: Do you support the proposed changes with regards to RoLR Procedures table section 104.5? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)</p>	<p>PLUS ES <b>does not</b> support the proposed changes to section 104.5, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The content is dependent on the outcomes of section 104.4 clauses. We do not believe that they are sufficient or complete.</li> <li>• It follows a review of section 104.4 will have downstream impacts on section 104.5, requiring its own review.</li> </ul> <p>PLUS ES recommends the following and hence proposes that the changes to this section cannot proceed via an expedited consultation.</p> <ul style="list-style-type: none"> <li>• A review is undertaken of the E2E B2B NEM RoLR procedure (Part A &amp; B) to ensure currency and efficiency.</li> <li>• If the proposed changes were to proceed additional analysis is required by the B2B Working group to ensure currency, alignment with applicable preceding sections and efficiency.</li> </ul>
<p>General</p>	<p>Question 4: If the changes proposed were to be expedited, would your organisation have any issues in implementing the changes by 15 May 2023?</p>	<p>Since the implementation of the new field HouseNumberToSuffix will not be implemented until 30 May 23, PLUS ES recommends an effective date after the 30 May 23.</p> <p>PLUS ES <b>does not</b> support an expedited consultation of section 104.4 and 104.5.</p>

General	Question 5: 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.	No additional comments.
---------	---	-------------------------