

11 July 2024



Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

Email: NEM.Retailprocedureconsultations@aemo.com.au

Dear Mr Westerman

B2B Procedures v3.9

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator's (AEMO's) *B2B Procedures v3.9 Consultation* (the Consultation Paper).

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy); and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Yurika Metering.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact Laura Males on 0429 954 346 or myself on 0429 394 855.

Yours sincerely,

A handwritten signature in blue ink that reads "Alena Christmas".

Alena Christmas
Manager Regulatory Affairs

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Email: alena.christmas@energyq.com.au

Encl: Energy Queensland's responses to the Consultation Paper questions.

B2B Procedures v3.9 Consultation First Stage

Participant Response Template

Participant: *Yurika Metering, Energex Limited, Ergon Energy Corporation Limited*

Completion Date: *11 July 2024*

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.	Energy Queensland agrees that the new Regulatory Classifications of 'LMRP' should be added to the B2B Procedures.
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.	Energy Queensland makes no comment.
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.	Energy Queensland agrees that a new allowable value of 'Defect Rectified' should be introduced.

Topic	Question	Comments
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.	<p>Energy Queensland does not agree with the new value of 'Comms4A', specifically, the proposed usage of this new exception code with a ServiceOrderStatus of 'Partially Completed'.</p> <p>In our view, if a meter has been successfully installed, the service order (SO) should be recognised as 'Completed', with no exception code applied. Where the SO is not able to be completed, the SO would be 'Not Completed'. If this were for example, a result of the customer refusing the installation of communications enabled meters, the proposed exception code could be applied. Where a customer refuses the installation of communications enabled meters, once the Metering Provider (MP) is on-site, the metering works would not be completed without contacting with the retailer to confirm 'Customer Refusal', and as such, work would either be 'Completed' or 'Not Completed' but not 'Partially Completed'.</p> <p>Noting the above exception, Energy Queensland agrees with the remainder of the marked-up changes as detailed in table 5 of the <i>B2B Procedure – Service Order Process</i>.</p>
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	Energy Queensland makes no comment.

Topic	Question	Comments
2.1.5 B2B Service Order Response Exception Codes	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.	Energy Queensland suggests that if the defect type/nature of defect detail is not able to be captured in MSATS procedures, for example, using a defect type 'enumeration – preferred', our preference for the sending/receiving of the nature of defect detail, would be via the proposed modified SAR/SAN transaction.

Topic	Question	Comments
<p>2.1.7 Shared Fusing Meter Replacement</p>	<p>Question 7: Do you agree with the proposed procedure changes? If no, please provide your reasoning and preferred changes.</p>	<p>Energy Queensland has concerns with the wording in Step 1 and Step 5 of the Shared Fusing Meter Replacement Procedure and makes the following suggested edits which for ease are italicised and underlined:</p> <p>Step 1 - MP discovers shared fusing: An MP discovers meters on a shared fuse, <u>where the DNSP is required to attend to undertake the outage</u>. The MP then must contact the Retailer that authorised the site visit and trigger the Procedure. These metering parties are referred to as the ‘Original MC’ under the Procedure.</p> <p>Our rationale for these additional words is to capture instances where the MP can isolate under a shared fuse arrangement. For example, there may only be one retailer involved for all customers.</p> <p>Step 5 - Retailers <u>All retailers deemed to be participating</u> raises a new SSW (‘Temporary Isolation – One In All In’) to confirm their participation in the scheduled outage with the DNSP.</p> <p>Our rationale for these suggestions is to ensure all retailers involved in multi dwelling meter replacements are required to participate.</p>

Topic	Question	Comments
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.	<p>Energy Queensland seeks clarification on the process when a retailer, in response to an MFIN triggered by a “one-in-all-in” meter isolation scope has not sent the SSW ‘temporary isolation’ request for the “one-in-all-in” instance. For example, does the retailer have the option to not be involved in the “one-in-all-in” meter isolation scope, or is each retailer required to participate.</p> <p>Energy Queensland also seeks clarification on who is responsible for the proportionate cost of isolation for each National Metering Identifier (NMI) if a retailer does not respond to the Meter Fault and Issue Notification with an SSW TI for their associated NMI(s). We understand the intent is that the cost associated with the entire temporary isolation or group supply will be apportioned across all affected NMIs, and receipt of the SSW TIs will be critical in the splitting of the costs. However, for clarity, additional documentation is required where a retailer has impacted NMI(s) but has not submitted the required SSW TI.</p>
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.	Energy Queensland agrees with the principles that the IEC have applied in determining the proposed procedure and schema changes.

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 10: Do you agree with the proposed procedure and schema changes? If no, please provide your reasoning and preferred changes.	Energy Queensland 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.	Energy Queensland makes no comment.
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.	Energy Queensland agrees with the proposed procedure changes.
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.	Energy Queensland makes no comment.

Topic	Question	Comments
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.	Energy Queensland makes no comment.
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.	Energy Queensland makes no comment.
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.	Energy Queensland agrees with the proposed procedure changes.
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.	Energy Queensland makes no comment.

Topic	Question	Comments
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.	Energy Queensland agrees with the proposed procedure changes.
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.	Energy Queensland makes no comment.
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.	Energy Queensland makes no comment.