

B2B Procedures v3.9 Consultation First Stage

Participant Response Template

Participant: Red Energy and Lumo Energy

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.	Red Energy and Lumo Energy (Red and Lumo) agree that a new enumeration is required for meter exchanges that are being completed under the LMRP because of the need to report on them distinctly to the AER, when they are described by the AEMC as a retailer-led meter exchange, and the need to communicate the priority of a meter exchange to be completed to an LMRP schedule vs any retailer-led meter exchange outside of the LMRP schedule.
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.	<p>Whether the new enumeration is a <i>RegClassification</i> or a <i>PurposeOfRequest</i> depends on whether the AEMC ASMD Final Determination provides regulatory obligations to complete them in a specified time frame which differs to a New Meter Deployment.</p> <p>The options we see are; (respectively <i>RegClassification</i> - <i>PurposeOfRequest</i>) If LMRP incur different completion time frame obligations to retailer-led;</p> <ul style="list-style-type: none"> ● LRMP - retailer-led ● New Meter Deployment - retailer-led <p>Or, if LMRP completion time frame obligations align to retailer-led;</p> <ul style="list-style-type: none"> ● New Meter Deployment - retailer-led ● New Meter Deployment - LRMP

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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.	Yes, the use of this PurposeOfRequest will clearly indicate to metering parties that a retailer has been advised by their customer, prior to raising the service order, that the site defect has been rectified.
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.	Red and Lumo support the additional Exception Codes and amended use of the specified Exception Codes to better communicate the reason a service could not be completed to the retailer and the customer.
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	Red and Lumo have not identified a better approach at this time.
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.	Use of a modified SAR/SAN with a new enumeration for nature-of-defect is preferable to new B2B transactions dedicated to providing nature-of-defect information. (Noting our preference is for the nature of the defect to be NMI Standing Data: If the AEMC does not specify this, then we need to obtain and/or receive the nature of defect via B2B. Ideally we would receive this from the current MC or DNSP of a site, noting they have been provided this information by the OriginalMC or a previous retailer.)

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2.1.7 Shared Fusing Meter Replacement	Question 7: Do you agree with the proposed procedure changes? If no, please provide your reasoning and preferred changes.	<p>While the Shared Fusing Meter Replacement Procedure is predicted to apply to approximately 40% of meters in two NSW DNSP areas, the number of coordinated temporary isolations of group supply required to exchange these meters should be significantly fewer as multiple meters will be exchanged during the same isolation.</p> <p>Is the communication of Scoping and One-In-All-In isolations better managed through a different method such as new PurposeOfRequest enumerations. e.g. SSW-TIGS with PurposeOfRequest as ‘Scoping Shared Fuse’ or ‘One-In-All-In’ clearly delineates the situation without requiring additional service order subtypes which will be used for a small and dwindling percentage of the NEM.</p> <p>Red and Lumo support: The use of ‘Coordinated Interruption ID’ in the FormNumber field when raising temporary isolation for shared fusing investigation or meter exchanges under a Shared Fusing Meter Replacement Procedure The inclusion of the ‘OriginalMC’ as the Co-ordinatingContactName when a temporary isolation for shared fusing is required.</p>
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>Is the communication of Scoping and One-In-All-In isolations better managed through a different method such as new PurposeOfRequest enumerations. e.g. SSW-TIGS with PurposeOfRequest as ‘Scoping Shared Fuse’ or ‘One-In-All-In’ clearly delineates the situation without requiring additional service order subtypes which will be used for a small and dwindling percentage of the NEM.</p>

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 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..	Red and Lumo agree with the principles that the IEC have applied
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.	Red and Lumo prefer Option 2 as it proposes not to align exactly to AS4590.1:2017 (because it is too detailed and we'd lose some useful formats) but to standardise address elements close to AS4590.1:2017 across B2M and B2B (and Gas markets eventually)
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.	Red and Lumo support the proposed approach.

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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.	Red and Lumo support the proposed change as it removes the option for Blank and ensures an empty string is used for consistency.
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.	Red and Lumo support the proposed change as it removes the option for Blank and ensures an empty string is used for consistency.
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.	<p>Red and Lumo would like to better understand the need for this change. What is the volume of instances in which a Form is required for re-energisation and do they merit the change?</p> <p>At this time we understand that FormReference and FormNumber are only used for limited scenarios in;</p> <p>NSW - Not required (As confirmed by Endeavour Energy & Ausgrid)</p> <p>Vic - Only required by Ausnet for exceptional circumstances</p> <p>Qld - Energex: The 'Distribution Disconnect for Defect' form signed by the REC is the main form of paperwork and the REC Safety Certificate is a secondary mainly used / accepted in major events.</p> <p>Tas - TasNetworks: Request an EWR from an electrical contractor if a premises is off supply for > 6 months and the EWR is a 'Form', not a Safety Certificate.</p>

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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.	There is an existing workaround by which participants provide confirmation of the documentation outside of the Service Order. This could continue to be used.
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.	Red and Lumo support this proposed change as it removes 'and the Customer is not present.' which is inaccurate/not applicable for a remote reenergisation.
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.	Red and Lumo support this proposed change as it removes 'and the Customer is not present.' which is inaccurate/not applicable for a remote reenergisation.
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.	Red and Lumo support this proposed change as these changes align with obligations of the metering parties to cancel a service when FRMP changes.

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<p>2.6 B014/23 - Define obligations for managing inflight service orders sent to metering service providers when a ROLR event is declared.</p>	<p>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.</p>	<p>Red and Lumo support this proposed change as these changes align with obligations of the metering parties to cancel a service when FRMP changes.</p>
<p>2.12 Questions on proposed changes</p>	<p>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.</p>	