

B2B Procedures v3.9 Consultation First Stage

Participant Response Template

Participant: TasNetworks

Completion Date: 10 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.	TasNetworks acknowledges that retailers and metering service providers may benefit from the addition of this new value. The addition of the new classifications to B2B procedures will have no impact on TasNetworks, as the field is not required when this S/O type is sent to the DNSP.
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.	TasNetworks has 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.	TasNetworks acknowledges that retailers and metering service providers may benefit from the addition of this new value. The new exception codes for service order responses will not impact on TasNetworks, as the field is not required when this S/O type is sent to the DNSP.

<p>2.1.5 B2B Service Order Response Exception Codes</p>	<p>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>	<p>TasNetworks agrees with the proposed changes to the S/O response exception codes to primarily assist with communication between metering service providers and retailers.</p> <p>TasNetworks recommends amending the definition of ‘Customer On-Site’ in Table 5 (clause 2.15) from ‘There is a Customer at Site and the Site was not de-energised.’ to ‘There is a Customer at Site resulting in the requested work not being completed.’ The ‘Used with ServiceOrderStatus’ column should also be populated with ‘Not Completed.’</p> <p>TasNetworks recommends amending the definition of ‘Sensitive Load’ in Table 5 (clause 2.15) from ‘Sensitive load and did not de-energise.’ to ‘Sensitive load resulting in requested work not being completed.’</p> <p>TasNetworks recommends amending the definition of ‘Life Support’ in Table 5 (clause 2.15) from ‘Life Support Customer and did not de-energise.’ to ‘Life Support Customer resulting in requested work not being completed.’</p> <p>TasNetworks recommends adding ‘Comms4A’ to the list of available ExceptionCode values in Table 14 (clause 4.2) when the ServiceOrderStatus is “Partially Completed ” to align with its use as defined in Table 5.</p> <p>In Table 14 (clause 4.2) the list of defect exception codes in the RecipientReference field incorrectly refers to ‘Table 4a of the B2B Procedure Customer and Site Details.’ TasNetworks recommends this be amended to be ‘Table 8 of the B2B Procedure: Customer and Site Details Notification Process.’</p>
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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	TasNetworks has no comment.
2.1.5 B2B Service Order Response Exception Codes	<p>Question 6: Please indicate your preference for sending and receiving Nature-of-defect information, between:</p> <ol style="list-style-type: none"> 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. 	<p>TasNetworks does not agree with the proposed changes to the SAR/SAN process. The changes as documented will have unnecessary impacts on DNSPs in terms of the processes that would be needed to modified in order to cater for the changes. DNSPs would need to change validation rules for inbound SARs to reject them when reason code 'Nature of Defect' may be received. Additionally, changing the hazard field from mandatory to optional could also result in hazard details not being provided when unsolicited SANs are provided, again requiring change to DNSP validations and downstream processes.</p> <p>TasNetworks recommends that if the SAR/SAN is to be used, then changes should be limited, to ensure the existing process can be preserved. This could be achieved by using existing reason codes, retaining hazard as mandatory, and adding the new hazard descriptions but noting that these are not valid when sending a SAN to the DNSP.</p> <p>TasNetworks does not support the introduction of two new B2B transactions as an alternative. We believe that the volume of its use would be insufficient to substantiate the cost for AEMO and industry to develop and implement the new B2B transactions.</p>

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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>Whilst TasNetworks acknowledges that the proposed procedure change may have merit in distribution areas where large volumes of legacy meters remain in service, TasNetworks is unlikely to adopt the new procedure, given that over seventy-five per cent of customers in Tasmania have already been supplied with an advanced meter.</p> <p>TasNetworks has implemented a similar procedure utilising existing service order types (miscellaneous for scoping, and the temporary isolation-group supply). As TasNetworks continues progression towards its 2026 smart meter deployment completion timeline, the cost of implementing system and process changes in line with the proposed changes is exacerbated due to likely minimal use. TasNetworks communicates outage information to affected retailers via email, which we will likely continue in lieu of the proposed MFIN process. We believe the process we have in place is satisfactory given the market conditions and remaining number of legacy meters in Tasmania.</p> <p>It is noted that even if TasNetworks does not utilise the modified procedure for the replacement of shared fusing meters, TasNetworks is likely to incur costs to ensure our system rejects the proposed two new service order subtypes.</p> <p>TasNetworks recommends amendments to the changes inserted to the 'Supply Service Works' completion times in Table 12:</p> <ul style="list-style-type: none"> - Remove the reference to 'NECF' as this is incorrect (Guidance Note 4 refers to the NER). - Remove the paragraph referring to Temporary Isolation – One In All In as under the draft rule this refers to The Shared Fusing Meter Replacement Date scheduling period, not the timing for completion of a service request.

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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>TasNetworks believes the existing miscellaneous and temporary isolation-group supply service orders could be adopted instead of introducing two new subtypes. As legacy meter volumes continue to diminish, the use of the existing temporary isolation-group supply service order request will become the norm for undertaking scoping/isolation when meter maintenance/replacement activities are required, as one-in-all-in no longer prevails.</p> <p>TasNetworks also suggests that the proposed new ReasonForNotice value of 'One In All In' in the MFIN may not be required and 'Other' could be utilised. It is anticipated that recipients will need to detect the Coordinated Interruption ID details contained in the Notes, and 'Other' may not be widely used at present.</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.	TasNetworks agrees with the principles the IEC has applied.

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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.	<p>TasNetworks agrees with the proposed procedure and schema changes.</p> <p>TasNetworks notes that the format of the 'FormReference' field in the B2B Procedure: Service Order Process needs to be shown as changed from VARCHAR(15) to VARCHAR(20) as proposed by this ICF.</p>
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.	TasNetworks has 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.	<p>TasNetworks agrees with the proposed change, however suggests alternate wording.</p> <p>TasNetworks suggests changing;</p> <p>'Where no title is available to populate PersonNameTitle, an empty string must be used to populate it instead' to;</p> <p>'Where no title is available to populate PersonNameTitle, an empty string must be provided'.</p> <p>Similarly, for PersonNameGiven, remove words 'used to populate it instead' and replace with 'provided'.</p>

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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.	TasNetworks suggests revised wording as per response to question 12.
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.	TasNetworks agrees with the proposed procedure change.
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.	TasNetworks has 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.	TasNetworks agrees with the proposed procedure change.
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.	TasNetworks has 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.	TasNetworks agrees with the proposed procedure change.
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.	TasNetworks has 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.	TasNetworks notes that Figure 2 in the B2B Procedure: Customer and Site Details Notification Process has a formatting error, whereby the arrow images are not displayed correctly.