

B2B Procedures

- Customer and Site Details
- Service Orders (version change)
- Meter Data (version change)
- One Way Notification (version change)
- Technical Delivery Specification (version change)

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Endeavour Energy

Completion Date: 20/04/2018

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1. Customer and Site Details

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		2.1.b	<p>Procedure improvement: It should be made clear that the Initiator of a Life Support Notification will either receive a Life Support Confirmation or a Life Support Rejection and never both.</p> <p>We suggest that subclause iv be deleted and subclause ii be updated to 'Life Support Confirmation/Rejection'</p>
Endeavour Energy		3.2.f	<p>Procedure improvement: It is not clear what is the timing obligation for the scenarios highlighted in this clause</p> <p>We suggest that this clause be updated to:</p> <p>[Guidance Note 1] A Current Retailer must send a CustomerDetailsNotification within 5 business days of the following events:</p> <ul style="list-style-type: none">(i) the completion of the CATS change of retailer process.(ii) for a new connection, once the site has been energised.

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		New clause 4.1.d and move subsequent clauses down	<p>Procedure improvement: It should be highlighted that a DNSP may reject a CDN where the SensitiveLoad field does not have the value of 'Life Support' and the DNSP has life support registered for the NMI</p> <p>We suggest inserting a new clause of 4.1.d, and moving subsequent clauses down, with the following words:</p> <p>[Guidance Note 1] The DNSP may reject a CustomerDetailsNotification where the SensitiveLoad field does not have the value of 'Life Support' and the DNSP has life support registered for the NMI</p>
Endeavour Energy		Table 4	<p>Providing a Life Support Request timing period</p> <p>Formatting error: The word 'recipient' in the Description of Timing Period column should have an uppercase R.</p>
Endeavour Energy		Table 4	<p>Providing a Life Support Notification timing period</p> <p>Formatting error: The word 'recipient' in the Description of Timing Period column should have an uppercase R.</p>
Endeavour Energy		4.1.a	<p>Procedure improvement: It should be made clear that this restriction does not apply to the Life Support Notification. This would prevent a participant from withholding a Life Support Notification until the end of the day in order to comply with this clause.</p> <p>We suggest adding the following words to the end of clause 4.1.a:</p> <p>This restriction does not apply to the Life Support Notification.</p>

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		4.1.f	<p>Procedure improvement: It should be made clear that a Customer Details Notification must be sent when SensitiveLoad field requires the value of 'Life Support' due to a Life Support Notification. This will provide the benefit that life support customer risks are managed in a transparent manner and that the life support customer will obtain the protection they are entitled to. An extra benefit is that future life support reconciliations are minimised as it would occur at the time of registration via the Customer Details Notification.</p> <p>We suggest update clause 4.1.f to:</p> <p>The Initiator must send updates where the Customer or Initiator initiated the Changes or it relates to setting the SensitiveLoad field to 'Life Support' due to a Life Support Notification. The Initiator must not send updates based on remaining information received from MSATS or other Participants. This prevents the unnecessary cyclical transmission of information.</p>
Endeavour Energy		4.1.g	Reference error: The reference error should be 4.3.2

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		4.3.1.e	<p>Contradicts NERR: This clause states that the DNSP must update their records, however the NERR (clause 125.7 and 125.12) states that the DNSP may update their records.</p> <p>Also this clause suggests that it is acceptable to remove the life support flag and communicate this to the DNSP when a retailer considers that life support is no longer required. This clause can be easily misinterpreted that the de-registration process, as stated in the NERR, is not applicable in this scenario. It should be made clear that the removal of life support flag should only be done when the de-registration process was successfully completed.</p> <p>We suggest that this clause be deleted and a new clause be added in as 4.3.2.d – please see our suggestion below.</p>
Endeavour Energy		4.3.2.b	<p>Grammar error: Remove the word ‘and’ from the sentence</p>
Endeavour Energy		4.3.2.b	<p>Procedure improvement: It should be made clear that there is no obligation on the Recipient to provide any additional level of service to prevent the loss of supply when ‘Sensitive Load’ is flagged.</p> <p>We suggest adding the following sentence:</p> <p>Note that the Recipient is under no obligation to provide any additional level of service to prevent the loss of supply to the NMI.</p>

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		Suggesting new clause 4.3.2.d	<p>Procedure improvement: The procedure should make it clear when the removal of 'Life Support' from the SensitiveLoad field is allowed.</p> <p>We suggest that a new clause be added as 4.3.2.d and with the following words:</p> <p>[Guidance Note 2] The removal of 'Life Support' from the SensitiveLoad field must only be done when the Retailer has met their deregistration obligations or they are informed of deregistration via a Life Support Notification from the DNSP.</p>
Endeavour Energy		4.3.3	<p>Contradicts NERR: This clause suggests that it is acceptable to remove the life support flag and communicate this to the DNSP when a retailer is aware of a vacant site. This clause can be easily misinterpreted that the de-registration process, as stated in the NERR, is not applicable in this scenario. It should be made clear that the removal of life support flag should only be done when the de-registration process was successfully completed.</p> <p>We suggest that this clause be updated to:</p> <p>[Guidance Note 2] If a Site is vacant, the Initiator must send a CustomerDetailsNotification containing NMI, LastModifiedDateTime and a MovementType value of 'Site Vacant'</p> <p>In addition a new clause be added in as 4.3.2.d – please see our suggestion above.</p>

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		4.4.1.a	<p>Procedure improvement: For consistency it should be made clear how the information in table 5 is to be provided and to avoid the information provided as an image of a participant's system.</p> <p>We suggest updating clause 4.4.1.a to:</p> <p>[Guidance Note 2] Where the DNSP or Retailer is informed by a customer that they require life support or there are changes to the life support information or requirement, they must promptly advise the other party using the Life Support Notification. The Life Support Notification must contain, in plain text, the name of all the fields followed by a colon and then the required information as defined in Table 5.</p>
Endeavour Energy		4.4.1.b	<p>Procedure improvement: It should be made clear what #NMI means to ensure consistency in communication. Also the term 'Life Support Notification' should be used instead of 'email' to make it clear that this obligation is only for the Life Support Notification.</p> <p>We suggest that this clause be updated to:</p> <p>All initiating Life Support Notifications must be sent to the Recipient's Life Support Notifications email address in the Retail Operations Contact List (ROCL). The email subject header for a Life Support Notification must be in the form of: 'Life Support Notification #NMI' where #NMI is the ten digit NMI value for the connection point.</p>

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		4.4.1.d	<p>Procedure improvement: The term 'Life Support Notification' should be used to make it clear that a Life Support Notification is required.</p> <p>We suggest that this clause be updated to:</p> <p>[Guidance Note 2] Following a change of Retailer, where the DNSP is the registration process owner, the DNSP must send the Current Retailer a Life Support Notification.</p>
Endeavour Energy		4.4.1.e.i	<p>Procedure improvement: The term 'Life Support Notification' should be used to make it clear that a Life Support Notification is required.</p> <p>We suggest that this clause be updated to:</p> <p>they must send the other party a Life Support Notification</p>
Endeavour Energy		4.4.1.e.iii	<p>Procedure improvement: The term 'Life Support Notification' should be used to make it clear this clause is related to a Life Support Notification.</p> <p>We suggest that this clause be updated to:</p> <p>the changes are effective from the date specified in the Life Support Notification</p>
Endeavour Energy		4.4.1.f	<p>Procedure improvement: It should be made clear that a de-registration notice can only be provided when the de-registration process was successfully completed.</p> <p>We suggest rewording</p> <p>[Guidance Note 1] Where the Retailer who is not the Current Retailer has provided information to the DNSP required in (a) and has successfully completed the life support de-registration process:</p>

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		Suggesting new clause 4.4.1.g	<p>Procedure improvement: The procedure should allow the DNSP to forward to the current retailer a Life Support Notification from a prospective retailer. This would be more efficient than having to re-generate a Life Support Notification. A DNSP may want to inform the current retailer of life support as a prudent approach to minimising potential negative impacts to the life support customer and to minimise mismatches in life support information.</p> <p>We suggest that a new clause be added as 4.4.1.g and with the following words: [Guidance Note 1] Where the Retailer who is not the Current Retailer has provided information to the DNSP required in (a), the DNSP may forward the Life Support Notification to the Current Retailer.</p>
Endeavour Energy		Table 5	<p>Procedure improvement: Table 5 should be located in section 5 where other similar information is located. Otherwise the section called 'Key to Usage' in section 5 should be replicated prior to table 5.</p>

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		Table 5	<p>Procedure improvement: Table 5 should include a field to indicate the date and time of when the email was generated. This will allow the Recipient to determine when an email was received out of order and take the appropriate action. It is not sufficient for the Recipient to assume the order by when the email was received.</p> <p>We suggest adding a new field in table 5 as follows:</p> <p>Field: LastModifiedDateTime</p> <p>Format: DATETIME</p> <p>Use: M</p> <p>Definition: Date and time that the information was updated in the Initiator's system</p>
Endeavour Energy		Table 5	<p>SiteAddress</p> <p>Procedure improvement: This field should be removed because the NMI Checksum is already provided and it is noted that currently the CSDN does not have this field.</p>
Endeavour Energy		Table 5	<p>LifeSupportStatus</p> <p>Procedure improvement: The field length needs to be increased to accommodate the allowable values.</p> <p>We suggest changing the format of LifeSupportStatus to VARCHAR(50)</p>

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		Table 5	<p>LifeSupportStatus</p> <p>Procedure improvement: The allowable values for the field LifeSupportStatus should include who received the medical confirmation in order to support clause 124.2.c of the NERR. It is not sufficient that a network</p> <p>We suggest removing 'Registered - Medical Confirmation' as an allowable value, and adding the following as allowable values:</p> <p>Registered - Medical Confirmation with network</p> <p>Registered - Medical Confirmation with retailer</p> <p>We also suggest adding the following note:</p> <p>'Registered - Medical Confirmation with network' must only be used by a DNSP when the DNSP has received medical confirmation from the customer, and must only be used by a retailer when a DNSP has informed them of this status.</p> <p>'Registered - Medical Confirmation with retailer' must only be used by a retailer when the retailer has received medical confirmation from the customer, and must only be used by a DNSP when a retailer has informed them of this status.</p>
Endeavour Energy		Table 5	<p>DateRequired</p> <p>Procedure improvement: The definition should use the word 'mandatory' instead of 'required' to align with the Use field</p> <p>We suggest that last sentence be updated to:</p> <p>Not mandatory when LifeSupportStatus is None</p>

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		Table 5	<p>DateRequired</p> <p>Procedure improvement: It should be made clear that when the start date to register life support equipment is dependent on an event in the future then the date provided must be the earliest possible date that the event can occur. This will avoid a gap between the event and the start date for the life support equipment. For example if a prospective retailer wants to register life support and align this registration with a retailer transfer on a next scheduled read date then the start date should be 2 days prior to the next scheduled read date.</p> <p>We suggest adding the following to the definition of the DateRequired field:</p> <p>If the date for when life support equipment is required is dependent on an event in the future then the date provided must be the earliest possible date that the event can occur.</p>

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		4.4.2	<p>Procedure improvement: It should be made clear that the Initiator of a Life Support Notification will either receive a Life Support Confirmation or a Life Support Rejection and never both.</p> <p>We suggest deleting clause 4.4.3 and updating clause 4.4.2 to:</p> <ul style="list-style-type: none">a) The Recipient of a Life Support Notification must send either a Life Support Confirmation or a Life Support Rejection to the email address the Life Support Notification was sent from.b) [Guidance Note 1] A Life Support Confirmation or a Life Support Rejection must be sent within 1 business day of receiving a Life Support Notification.c) If a Life Support Confirmation or a Life Support Rejection is not received then the Initiator must contact the Recipient to resolve any delivery problem.d) The email subject header of a Life Support Confirmation must be in the form of 'Life Support Notification #NMI Confirmed' where #NMI is the ten digit NMI value in the original Life Support Notification.e) The email subject header of a Life Support Rejection must be in the form of 'Life Support Notification #NMI Rejected' where #NMI is the ten digit NMI value in the original Life Support Notification. The reason for the rejection must be specified in the body of the email.f) The Initiator of a Life Support Notification that was rejected must review the rejection and take appropriate action.

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		4.4.4.a	<p>Procedure improvement: It should be made clear what #NMI means to ensure consistency in communication. In addition the participant's id should be included so that the Recipient can confirm if the Initiator is entitled to the requested information.</p> <p>We suggest updating clause 4.4.4.a to:</p> <p>[Guidance Note 1] Where a party requires confirmation on a life support registration they may send a Life Support Request to the other party. The email subject header must be in the form of 'Life Support Request #INITIATORID #NMI' where #INITIATORID is the Initiator's Participant ID and #NMI is the ten digit NMI value for the connection point.</p>
Endeavour Energy		4.4.4.c	Formatting error: The words 'Life Support Notification' should be underlined

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		4.4.4.c	<p>Procedure improvement: It should be made clear that a Recipient of a Life Support Request must provide a Life Support Notification if the request was valid otherwise a Life Support Rejection must be provided.</p> <p>We suggest updating clause 4.4.4.c & 4.4.4.d to:</p> <ul style="list-style-type: none"> c) [Guidance Note 1] The Recipient of a Life Support Request must send either a Life Support Notification or a Life Support Rejection to the email address the Life Support Request was sent from. d) [Guidance Note 1] A Life Support Notification or a Life Support Rejection must be sent within 5 business day of receiving a Life Support Request. e) [Guidance Note 1] If a Life Support Notification or a Life Support Rejection is not received then the Initiator may contact the Recipient to resolve any delivery problem. f) [Guidance Note 1] The email subject header of a Life Support Notification must be in the form of 'Life Support Request #NMI Notification' where #NMI is the ten digit NMI value in the original Life Support Request. g) [Guidance Note 1] The email subject header of a Life Support Rejection must be in the form of 'Life Support Request #NMI Rejected' where #NMI is the ten digit NMI value in the original Life Support Notification. The reason for the rejection must be specified in the body of the email. h) [Guidance Note 1] The Initiator of a Life Support Request that was rejected should review the rejection and take appropriate action.

Participant Name	Old Clause No	New Clause No	Comments
Endeavour Energy		New clause 4.4.4.i	<p>Procedure improvement: It should be made clear that only one Life Support Request per NMI per day can be raised. This is to minimise the volume of requests and aligns with a similar restriction for Customer Details Requests.</p> <p>We suggest adding a new clause 4.4.4.i with the following words:</p> <p>An Initiator must only send a maximum of one Life Support Request per NMI per day.</p>
Endeavour Energy		4.5.e	Reference error: Reference to table 12 should be table 11
Endeavour Energy		4.5.e	<p>Procedure improvement: The reconciliation process should include the new Life Support Request process.</p> <p>We suggest updating the last sentence to:</p> <p>If the DNSP finds an issue with the customer data other than the Life Support flag provided in the CustomerDetailsReconciliation, the DNSP must use the CustomerDetailsRequest and the Life Support Request processes detailed in this Procedure.</p>
Endeavour Energy		4.5.f	<p>Procedure improvement: The reconciliation process should take into consideration the de-registration process</p> <p>We suggest updating the last sentence to:</p> <p>For NMIs provided by the Current Retailer in the CustomerDetailsReconciliation transaction(s) that are not flagged by the DNSP, or other party as having Life Support, the DNSP or other party must accept the transaction(s) and update its records accordingly with Life Support if no evidence of a de-registration notice was received.</p>

2. Option and commentary for long term solution

Endeavour Energy supports option 2, a central repository, provided that this option allows for near real time notifications and does not inadvertently allow for a market participant to discriminate against a customer because the customer has registered life support equipment at a premises. We suggest that a prospective retailer can register life support, and update or remove their own life support register for a premises but is not allowed to view, update or remove another participant's life support register. This will prevent a prospective retailer from potentially discriminating against a customer who has registered life support equipment because of the fact that they cannot be disconnected for non-payment.

Endeavour Energy sees option 2 as a solution that is robust and secure like option 1 but has the added advantage of eliminating the requirement for the life support reconciliation as detailed in the current B2B procedure. Option 2 also has the potential to further provide better customer experiences in the future, for example by streamline the process for verifying a customer's entitlement to life support rebates.

We note that the Notice of First Stage Consultation states that option 2 "... the creation, update and removal will only be performed by the registration process owner of the life support information". This statement does not align with the NERR, which allows for another participant who is not the registration process owner to de-register the life support equipment at a premises. We look forward to working with AEMO and the IEC to develop the system requirements and design to provide a solution to provide the needs of the customer and the industry.