B2B - NER Consultation paper

CONSULTATION

CONSULTATION PARTICIPANT RESPONSE

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1. Response to Consulation Paper Questions

United Energy (UE) welcomes the opportunity to respond to the Draft B2B Procedures consultation and associated material. Our response covers key points in relation to the consultation, response to each of the Draft Procedures and the Technical Delivery Specification discussion paper.

Consultation paper feedback

UE makes the following key points

Section	Comment
4.2 IEC Legal advice on procedure content	UE notes that there is legal advice that may affect whether certain obligations/wording remains in the procedure. UE is of the view that the B2B Procedures adopt a standard industry practice, these constitute the agreed efficient process for operation of services across industry participants and the IEC as the governing body has agreed these arrangements. The B2B Procedures always undergo Rules/public consultation so any party can comment. The next major reform of the B2B Procedures should adopt a similar practice of ensuring efficient and reliable communications for the process of services to customers. The new Rules require the IEC to ensure that their decisions have been made in accordance with the B2B principles ie that the B2B Procedures should detail operational and procedural matters and technical requirements that result in efficient, effective and reliable B2B Communications. The new Rules also require for each B2B Communication, the B2B Procedures: (1) must specify: (i) the required B2B Data inputs and B2B Data outputs; (ii) the required business process flows and related timing Requirements…. The AEMC has recognised that any Rule or jurisdictional regulatory requirement can be considered in the B2B procedures and the IEC needs to take into account the efficient means of compliance taking into account costs. In the AEMC Final determination they stated that: 'If certain parties are required to provide a service or communicate a particular way, for example under jurisdictional regulations or other retail market procedures, the IEC would be able to consider whether the benefits of including that communication in the B2B procedures

	(that is, the cost savings to the affected parties compared to using an alternative) outweigh the costs of compliance with the B2B procedure. The IEC needs to consider the benefits of standardisation and reliability vs the cost of compliance and the cost of alternative means of transacting the services in the mass market across multiple participants. It is important that the issues and alternatives are well documented and considered providing a clear governance trail leading up to decision making. UE consider that this is important to ensure that end to end industry processes are robust, reliable and in the interests of consumers. A key elements of this include the items below regarding clarity of the role obligations, clear IT technical requirements on the transactions and notification processes. Industry cannot build unless all of these matters come together in the consultation process. The IT architecture element is as important in our internal build process as the content and format of the transaction. The IEC needs to ensure that this work is undertaken and included as part of the second round of consultation. UE recommend that the B2B Procedures include the process flow and operational detail that leads to a uniform approach for B2B as this is a requirement under the NER for the B2B Procedures. UE note that the B2B Guide in Table 1 clarifies the initiator, recipient and notified parties. In some cases the initiator should be limited to the current FRMP and in others any retailer could request the service. UE suggest that these roles by B2B service be made clear in the guide. As drafted the initiator could be any retailer and if the B2B communication is for the DB to undertake the service, then despite the B2B communication being properly formed we assume that we could reject the B2B communication and hence the service request and not be in breach of the B2B Procedures. Similarly agreements are not required with MC and MPs etc to facilitate these communications so if there is no agreement then there is no need to provide B2B Communications or comply with B2B Procedures with that party. This has the potential to be detrimental to customers and services provided to customers.
6.2 Service Order Process	**A. Do the content and the structure of the Service Order Transactions meet industry needs?** On the whole UE is of the view that the structure and content of the service order is a suitable arrangement for the industry moving forward. For example clearly identifying the Supply related services orders verses the Metering related service orders is a useful distinction that will be of benefit as the Industry enters into Metering competition. UE is also of the view that the concept of notified parties to service orders as described in the procedures is an important feature and of

	benefit to Industry, and UE certainly intends to utilise it within our business.
6.3 Customer Site Details Notification (CSDN)	**6.3 Customer Site Details Notification (CSDN)** UE notes that there have been changes / additions to the data required to be shared in the Customer Details Notification. We also note there is ongoing work being conducted by the AER to define Life-support obligations and that the additional information may be proposed in the procedures. UE welcome the inclusion of this additional information/process in the 1 Dec 17 release as this would be the most cost effective delivery. However the AER rule change and process requirements would need to be very clear and have completed rules consultation for this to be part of the second round of B2B consultation commencing just prior to Christmas 2016. This is not practical and this set of B2B changes should not pre-empt the outcomes of the AER rule change proposal or the AEMC final determination. UE recommend that these changes be considered after the AEMC Final determination and that any B2B Procedures amendments not be effective until after 1 July 2018. Industry should concentrate on delivery and rectification of issues in production first before the next B2B release. The consultation paper poses a number of question relating to embedded network and life support as follows: **A. Who has the obligation(s) in an Embedded Network to notify any relevant participant(s) of Life Support?** UE is of the view that the Life-support obligations as they relate to Embedded Networks reside with the exempt embedded network service provider (EENSP) who is exempt under the NER where the customer advises them of the need for life support. However it becomes less clear with respect to the Embedded Network Operator (ENO), Embedded Network Owner (ENO?) or the Embedded Network Manager (ENM). The AER draft exempt network guideline suggests that where a child customer advises the EENSP they need to advise the child's retailer (exempt seller or FRMP) and the EENSP advises the parent FRMP and the parent FRMP advises the LNSP. Usual practice is that the child advises their retailer who advises the EENSP. The EENSP advises the parent FRMP who advises the LNSP. Therefore the Retailer is the key party responsible for managing life-support information for customers on embedded networks. UE expects no change in this position when the AER does make the Final determination on the exempt network guideline. **How do participants communicate customer Life Support information in an Embedded Network?**

	B2B Parties must comply with B2B Procedures and a B2B party includes the following; Distribution Network Service Providers, retailers, Local Retailers, Metering Coordinators, Metering Providers, Metering Data Providers, Embedded Network Managers and other Third Party B2B Participants. A DNSP includes an EENSP, as the NER definition refers to a DNSP as a person who engages in the activity of owning, controlling, or operating a distribution system. It is up to the IEC to decide whether the new ENM role has a transacting option or requirement under the B2B procedures or whether this resides with the EENSP. Not every embedded network needs an ENM, those networks that don't have an ENM could possibly have a life support customer. In contrast the EENSP obligations in relation to life support is independent of the existence of an ENM for the network. The IEC should review the requirements once the AER makes their Final determination on the exempt network guideline. It is important that life support communication obligations by role are clear and consistent so there is no inadvertent disconnection of life support customers. The IEC needs to consider the costs across all retailers and LNSPs of not having a uniform approach to the exchange of this information and the potential for missing notifications and possible penalties and the cost for the EENSPs to provide information in a standard B2B communication which might be able to include email with certain contact points and subject matter detail. **Are B2B communications required? Note: The Embedded Network Operator (ENO) is not required to be a B2B Participant.** UE recommend that AEMO provide legal advice on whether an EENSP is part of a DNSP, as the EENSP's network can be connected to another distribution system, they appear to be included. There might not be an ENM appointed for all EENSPs so we suggest that the EENSP may be the better transacting party. The requirement to transact in a variable or uniform approach and the risks involved needs to be considered by the B2B w/g and recommended to the IEC. **Should the SiteAccessNotification be available for parties related to a NMI to send new or updated site hazards and access details?** The current one-way direction where (unsolicited) site access notification are pushed from the Retailer to other parties is adequate. It is not necessary and in fact undesirable to have a multi-way push as it will create a condition where one party receives the update, and then publishes to the next who the publishes to the initial, who cause the change they received to be published again and so on. **Which participant(s) should be considered the 'master of record'**

	holder for this information? The SAN model as proposed in the procedures should be kept as similar as possible to the CDN model for the foreseeable future. That is the retailer "pushes" any unsolicited changes – but all others only supply when requested. This however does not imply that the retailer holds the' master of record' for this information as for Site access notifications it must be the participant's own choice as to whether they update their own records based on what they receive.
6.4 One Way Notification	• UE believes that in general the structure of the body of the one-way notification needs to become more flexible and needs to allow XML structured content. • UE believe that the Notification of Metering Works 'payload' as it is defined (which is in effect as a CSV), will prove unworkable, and that the payload should be re-designed to use a nested XML structure. • UE believes that the traditional B2B mechanism for the receiver to reject lines within a One-way Notification body when the body is a CSV structure is clumsy – but since it is established practice it is workable – however this method does not translate at all well to a One-Way Notification where the body is an XML structure. Therefore a mechanism must be found to allow lines / rows, within an XML structure to be similarly rejected on a line by line basis when the entire content cannot be accepted by the receiver.
6.5 Meter Data Process	**Should the Remote on Demand Meter Read be included in the Meter Data Process or the Service Order process?** UE sees merit in both a Service Order and a Non-Service Order approach. A service order approach makes sense if the service is offered and billed on an individual transaction basis, and the nature of the service never changes. However UE suspects suspects that Service Orders are not particularly well suited for a "real-time" transaction response, and also that also these service could be offered on a subscription, monthly basis, or volume basis which is not well supported by the Service Order model. Additionally the requester may require different variations of the service. In those cases it may be better left as a separate dedicated B2B transaction request (i.e. not a Service Order), with a range of input parameters that can be invoked at will and the terms of service defined between parties. However UE believes that in either case, whether the transaction is invoked via a service order or via another means that the format of the response to that transaction as it is defined may not necessarily be suitable. In particular the requirement that the response be delivered as a Meter Data Notification imposes a NEM12 structure and implies that the data must validated. This seems unnecessarily restrictive and

	whislt is strictly speaking compliant with the rules, we believe is not consistent with the original intent. UE recommend that unless Industry participants who are specifically seeking or offering this service are in a position to define useful response formats now, that the procedures do not specify the format of the returned structure and that it is left to future bi-lateral negotiation between parties who may offer or seek theses services in the future. **Should the Meter Installation Inquiry be included in the Meter Data Process or the Service Order process?** UE sees merit in both a Service Order and a Non-Service Order approach. A service order approach makes sense if the service is offered and billed on an individual transaction basis, and the nature of the service never changes. However UE suspects suspects that Service Orders are not particularly well suited for a “real-time” transaction response, and also that also these service could be offered on a subscription, monthly basis, or volume basis which is not well supported by the Service Order model. Additionally the requester may require different variations of the service. In those cases it may be better left as a separate dedicated B2B transaction request (i.e. not a Service Order), with a range of input parameters that can be invoked at will and the terms of service defined between parties. However UE strongly recommends that in either case, whether the transaction is invoked via a service order or via another means that the format of the response to that transaction as it is defined is unsatisfactory. In particular the structure of the response as defined will prove unsuitable for most real-world use-cases. . UE recommend that unless Industry participants who are specifically seeking or offering this service are in a position to define useful response formats now, that the procedures do not specify the format of the returned structure and that it is left to future bi-lateral negotiation between parties who may offer or seek theses services in the future.