

B2B Procedures Version 2.1

Initial Consultation Participant Response Pack

Australian Energy Regulator Completion Date: Friday 20 December 2013

9. Participant Responses

This section lists the changes proposed to the B2B Procedures: Version 2.0.

Proposed changes have been categorised as Procedure changes as follows;

- Table 9.1 covers the proposed changes to the B2B Procedure Customer and Site Details Notification Process.
- Table 9.2 covers the proposed changes to the B2B Procedure Service Order Process.
- Table 9.3 covers the proposed changes to the B2B Meter Data Process.
- Table 9.4 covers the proposed changes to the B2B Procedure One Way Notification Process.
- Table 9.5 covers the proposed changes to the B2B Procedure Technical Guideline for B2B Procedures.
- Table 9.6 covers the proposed changes to the B2B Procedure Technical Delivery Specification.

9.1 Proposed changes to the B2B Procedure Customer and Site Details Notification Process

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedure Customer and Site Details Notification Process	Rating (H/M/L ¹)	AEMO Response
			Blue underline means insert		
			Red strikeout means delete		
9.1	002	We have concerns regarding the proposed changes to the reconciliation process in the B2B procedure: Customer Site and Details Notification (CSDN) Process. The proposed procedural changes seek to limit the customer data reconciliation process to life support details only. Therefore, retailers will no longer need to reconcile with distributors a range of customer information including name, postal address and telephone number. By removing the requirement to regularly reconcile customer data, the accuracy of customer information held by distributors may be compromised. In consequence, this may impact the quality of information provided by distributors to retailers of last resort (RoLR) following the failure of a retailer. Under AEMO's National Electricity Market RoLR processes, distributors are	We propose there are no changes to the B2B procedure: CSDN Process which will limit the scope of customer information captured by the reconciliation process.		

¹ L= Low: Not critical. Issues / comments are minor. They add clarity to the document. No major concern if not included in any further revisions M= Medium: Important. Strong case that issue / comments should be considered and an update to the document is desirable, but not critical. H= High: Critical. The issues / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

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		required to provide the RoLR with their customer details for each relevant NMI. However, if this data is incorrect, this may cause delays in billing and general communication.			
		The impact of inaccurate customer data was demonstrated following the failure of Jackgreen. Following this RoLR event, we received reports from RoLRs that the data sets received were incomplete or incorrect. According to one RoLR, the problems in customer data caused delays in their engagement with the customers of Jackgreen.			
		We consider accurate customer details are paramount for ensuring RoLR events cause minimal disruption to the market and for minimising the cost impost of a RoLR event on designated RoLRs.			
		Therefore, it is our position that the proposed changes to the reconciliation process in the B2B procedure: CSDN Process should not be implemented. If the proposed changes are implemented, we would need to consider whether to introduce customer data quality measures through the national RoLR scheme in the National Energy Retail Law.			

Proposed changes to the B2B Procedure Service Order Process

ltem	ID	Clause/Issue/Comment	Proposed revised B2B Procedure Service Order Process text	Rating (H/M/L ²)	AEMO Response
			Blue underline means insert		
			Red strikeout means delete		
		No comment			

 $^{^{2}}$ L= Low: Not critical. Issues / comments are minor. They add clarity to the document. No major concern if not included in any further revisions M= Medium: Important. Strong case that issue / comments should be considered and an update to the document is desirable, but not critical. H= High: Critical. The issues / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

9.2 Proposed changes to the B2B Procedure Meter Data Process

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedure Meter Data Process text	Rating (H/M/L ³)	AEMO Response
			Blue underline means insert		
			Red strikeout means delete		
		No comment			

 $^{^{3}}$ L= Low: Not critical. Issues / comments are minor. They add clarity to the document. No major concern if not included in any further revisions M= Medium: Important. Strong case that issue / comments should be considered and an update to the document is desirable, but not critical. H= High: Critical. The issues / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

9.3 Proposed changes to the B2B Procedure One Way Notification Process

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedure One Way Notification Process text	Rating (H/M/L ⁴)	AEMO Response
			Blue underline means insert		
			Red strikeout means delete		
		No comment			

⁴ L= Low: Not critical. Issues / comments are minor. They add clarity to the document. No major concern if not included in any further revisions M= Medium: Important. Strong case that issue / comments should be considered and an update to the document is desirable, but not critical. H= High: Critical. The issues / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

9.4 Proposed changes to the B2B Procedure Technical Guidelines for B2B Procedures

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedure Technical Guidelines for B2B Procedures text	Rating (H/M/L⁵)	AEMO Response
			Blue underline means insert		
			Red strikeout means delete		
		No comment			

 $^{^{5}}$ L= Low: Not critical. Issues / comments are minor. They add clarity to the document. No major concern if not included in any further revisions M= Medium: Important. Strong case that issue / comments should be considered and an update to the document is desirable, but not critical. H= High: Critical. The issues / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

9.5 Proposed changes to the B2B Procedure Technical Delivery Specification

Item	ID	Clause/Issue/Comment	Proposed revised MSATS text	Rating	AEMO Response
				(H/M/L ⁶)	
			Blue underline means insert		
			Red strikeout means delete		
		No comment			

 ⁶ L= Low: Not critical. Issues / comments are minor. They add clarity to the document. No major concern if not included in any further revisions
M= Medium: Important. Strong case that issue / comments should be considered and an update to the document is desirable, but not critical.
H= High: Critical. The issues / comments are fundamental and failure to make necessary changes has the potential to impact consensus.