

Insert Company Logo Here

B2B Procedures Version 2.2

Initial Consultation Participant Response Pack

Participant: Lumo Energy

Completion Date: **30 Jul 2014**

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.

Comment on Consultation Pack – to be included in separate e-mail – not part of formal response

Page 4 (second last paragraph) states that the proposed procedure changes have been considered and endorsed by the BMRG. I don't accept this proposition. BMRG had a briefing on the status of this development during the May BMRG meeting. The proposals were not circulated to BMRG for consideration or review prior to the consultation starting. I do not consider that an adequate process for review and endorsement.

I would expect to see the proposals prior to the consultation, have time to review and consider what is being proposed and be able to raise any issues that I felt needed to be covered off.

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

Please complete the relevant columns below in order to record your response. If you have no comments on this document please note this as a general comment in the table.

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedures text	Rating (H/M/L ¹)	AEMO Response
			<p><u>Blue underline</u> means insert</p> <p>Red strikethrough means delete</p>		
9.1.1	001	Lumo has no objection to the proposed change		L	
9.1.2	001	Lumo has no objection to the proposed change		L	

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.

9.2 Proposed changes to the B2B Procedure Service Order Process

Please complete the relevant columns below in order to record your response. If you have no comments on this document please note this as a general comment in the table.

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedures text	Rating (H/M/L ²)	AEMO Response
			<p><u>Blue underline</u> means insert</p> <p>Red strikethrough means delete</p>		
9.2.1	721	Lumo has no objection to the proposed change		L	

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.
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9.3 Proposed changes to the B2B Procedure Meter Data Process

Please complete the relevant columns below in order to record your response. If you have no comments on this document please note this as a general comment in the table.

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedures text	Rating (H/M/L ³)	AEMO Response
			<p><u>Blue underline</u> means insert</p> <p>Red strikethrough means delete</p>		
9.3.1	721	Lumo has no objection to the proposed change		L	
9.3.2	721	Lumo has no objection to the proposed change		L	
9.3.3	721	<p>The wording in the existing clause is poor in that the Participant’s actions are tied to the third sub-clause rather than clause a) with the three conditions.</p> <p>The proposed wording does not improve the objective of the clause overall.</p>	<p>2.5 Provide Meter Data Process</p> <p>a. <u>A Participant may commence the Provide Meter Data Process</u> if:</p> <ol style="list-style-type: none"> 1. a Participant reasonably believes that they have not received <u>requires</u> MDFF Data for a NMI <u>from an MDP to which it is entitled in accordance with the rules;</u> 2. a Participant requires historical Metering Data from a MDP to which they are entitled pursuant to the CATS Procedure and/or a jurisdictional instrument; or 3. a Participant requires a MDP to re-send certain MDFF Data -, then a Participant may commence the Provide Meter Data Process. 	M	

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.

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedures text	Rating (H/M/L ³)	AEMO Response															
9.3.4	721	<p>General comment</p> <p>The drafting of the clause is rather wordy</p> <p>The proposed amendment does not cater for daily / remotely read type 5 interval meters.</p> <p>Victoria has over 2.4 million of these types of meters, or approximately 37 % of the network connections in the NEM. Further, this type of meter is expected to be installed outside Victoria, the obligations need to cover this meter type appropriately.</p> <p>Given other policy proposals for remotely read meters to be installed, it is reasonable to separate the obligations to manually and remotely read meters.</p> <p>Clause a –</p> <p>In relation to the 6 day wait for type 5 metering. While this may be reasonable for manually read meters, the delay exceedingly long for remotely read meters where data is generally being delivered every 24 hours. This issue also applies in relation to data from Service Orders for these meters.</p>	<p>3.2.3 Timing Requirement for sending a MeterDataNotification for a ProvideMeterDataRequest.</p> <p><u>a A Participant must not issue a ProvideMeterDataRequest relating to a scheduled reading event prior to the completion of:</u></p> <table border="1"> <thead> <tr> <th>Meter Type</th> <th>PMD request after</th> <th>PMD for Service Order Request after receipt of service order response</th> </tr> </thead> <tbody> <tr> <td>1,2,3,4</td> <td>4 Business Days after read event</td> <td></td> </tr> <tr> <td>remotely read 5</td> <td>2 business Days after expected data delivery</td> <td>1 business Day</td> </tr> <tr> <td>manually read 5,6</td> <td>6 Business Days following published next scheduled read date</td> <td>4 Business Days</td> </tr> <tr> <td>7</td> <td>7th Business Day after months end for MDFF data</td> <td></td> </tr> </tbody> </table>	Meter Type	PMD request after	PMD for Service Order Request after receipt of service order response	1,2,3,4	4 Business Days after read event		remotely read 5	2 business Days after expected data delivery	1 business Day	manually read 5,6	6 Business Days following published next scheduled read date	4 Business Days	7	7 th Business Day after months end for MDFF data		M	
Meter Type	PMD request after	PMD for Service Order Request after receipt of service order response																		
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manually read 5,6	6 Business Days following published next scheduled read date	4 Business Days																		
7	7 th Business Day after months end for MDFF data																			

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedures text	Rating (H/M/L ³)	AEMO Response
9.3.5	721	Clause 3.2.4 a.– too repetitive of transaction types – which made the obligation convoluted	<p>3.2.4 a. Where a MDP is required to send a MeterDataNotification in response to a ProvideMeterDataRequest, the MDP must send the MeterDataNotification within one business day of receiving the ProvideMeterDataRequest.</p> <p>a. Where an MDPO is required to send a <u>MeterDataNotification in response to a ProvideMeterDataRequest, the MDP must send the response within one Business Day</u></p>		
9.3.6	721	Lumo has no objection to the proposed change		L	

9.4 Proposed changes to the B2B Procedure One Way Notification Process

Please complete the relevant columns below in order to record your response. If you have no comments on this document please note this as a general comment in the table.

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			<p><u>Blue underline</u> means insert</p> <p>Red strikethrough means delete</p>		
9.4.1	721	Lumo has no objection to the proposed change		L	

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

Please complete the relevant columns below in order to record your response. If you have no comments on this document please note this as a general comment in the table.

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedures text	Rating (H/M/L ⁵)	AEMO Response
			<p><u>Blue underline</u> means insert</p> <p>Red strikethrough means delete</p>		
9.5.1	721	Lumo has no objection to the proposed change		L	

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9.6 Proposed changes to the B2B Procedure Technical Delivery Specification

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9.6.3	721	Lumo has no objection to the proposed change		L	

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