Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
1	AGL			General Comment Clauses should be amended to reflect that the Life Support information being distributed is via 'notices' and any references to e-mail should only occur where it is specific – eg e-mail subject header.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: Agree

2	Tango		General – Use of E-mail	Tango Energy recognises the need for changes to Life Support processes in light of the NERR change. However, we question if the proposed use of email, in the format outlined in the Procedures, is the most efficient, user friendly and cost effective way of addressing the NERR change. As it is intended for this to be an interim process, to have the email life support transaction replicate a B2B transaction with 'Field', 'Format' and 'Use' requirements is viewed as onerous and over prescriptive. Given this is a manual process there is a greater chance of errors occurring therefore placing participants at undue risk of being in breach of these Procedures. It is suggested a simpler approach be taken as to how the information, required under the NERR change, is conveyed. It is suggested, if e-mail is the preferred method, a reference to the use of email be made in the Procedures with appropriate templates and/or detail provided in the B2B Guide. We also express concern with the ongoing use of email as a solution for life support given potential issues of security and reliability. We suggest the IEC consider more appropriate methods for the provision of this information and perhaps explore use of the LVI for this transaction in the interim.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – template to remain in the procedures. B2BWG believe that having this in the procedures reduces the risk of errors as some validation can be performed on the template.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
					Alternative options were presented to the IEC and the IEC endorsed and approved the email option as an interim solution.
3	Tango		General – Life Support Equipment	With regard to the life support equipment, we can find no reference in the NERR changes requiring this information to be specifically recorded (outside of the medical confirmation form). From our reading of the NERR and Procedures we can find no justification for the provision of this data and question why it is required. All customers on life support should be treated equally regardless of the type of life support equipment 'installed' at the customer's premises, therefore distinguishing the type of life support equipment is not critical and the requirement should be removed.	2/5/2018 B2BWG – NERR clause 124 B subclause 1A

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
4	Tango		General – Multiple Parties	The Procedures identify the Current Retailer as the Initiator of the CustomerDetailsNotification. The Guidance Notes provided in the Procedure indicate the Recipient of the notification is the DNSP. With the recent Power of Choice (PoC) implementation it is clear participants other than the DNSP have the ability to de-energise a customer's premises. It is recommended that a holistic approach be adopted when addressing life support such that each party (DNSP, MC, and MP) who can affect the supply at a customer's premises has access to and is aware of the current status of life support.	2/5/2018 B2BWG – obligations sit with DB and Retailer not the Service Providers. The rule change is written for the registration and deregistration of life support and how that information is passed between the two parties. Other parties may receive this information as per their contractual agreements.

5	Red/Lumo			Red and Lumo Energy would also like to suggest the inclusion of Data requirements for the other Life Support transactions also be considered (similar to Table 5) that includes the minimum data required fields for the following transactions; (i) Life Support Confirmation (ii) Life Support Rejection (iii) Life Support Request It is especially important for the rejection transaction at a minimum to include a mandatory Event Code field (referencing Table 11). **4.4.3** *(d) Life support Rejection must include an Event Code as listed in Table 11 and where applicable a Details field where further explanatory information can be provided.*	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG agreed to create a request and rejection template Data **request**: InitiatorID - M NMI -M NMI Checksum - M

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
					Reason **Rejection** NMI NMI checksum Event code

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
6	CitiPower Powercor			CitiPower Powercor suggests that the procedure consider a section on how distributors should deal with validating a prospective retailer scenario.	2/5/2018 B2BWG - it's a heads up notification to advise the DB that a potential life support customer may be moving into the site. A prospective retailer can be any retailer in the market so validation may not be possible. More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
7	TasNetworks		2.1(b)(ii)	The term “Life Support Confirmation” is not clear. It is also very similar, and may be confused with the term “Medical confirmation” which must be provided by the customer to the Process Registration Owner. Proposed improvement: Change the title of the notification to “Life Support Acceptance”. This more accurately reflects what the recipient is doing when they respond to a Life Support Notification that is not rejected. This change would require updates throughout the procedure document wherever “confirmation” is used.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agree
8	AusNet		2.1 (b)	AusNet Services recommends changing the transaction name from “life support confirmation” to “life support acceptance”. This is in line with the standard accept/reject transaction model associated with other B2B transactions. It also is in line with the generic request and notification process diagram in figure 2.	Refer 7

9	Simply		2.1 (b)	Replace (ii) Life Support Confirmation with (ii) Life Support Confirmation/Rejection as described in the following clause 2.2 (iv)	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG believe that these are two separate transactions as the procedure has now been updated to include some content for the rejection notification.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
10	Endeavour		2.1.b	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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – Updated 2.2.a.iv and 4.4.2 to state that only an acceptance or rejection notification would be received.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
11	TasNetworks		2.2	Process Diagrams: TasNetworks considers it necessary to include a detailed process diagram(s) to illustrate the process flows between participants for a customer move-out/move-in scenario which also may incorporate a retailer churn. The process flow should consider the transaction and email flows and the life support information that should be contained within these communications. Depending on the timings of customer move-out/move-in and the 15 business day de-registration period, there is potential for the recipient to receive conflicting information.	2/5/2018 B2BWG – agree more information will be provided in the B2B guide as part of final determination

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
12	Aurora		Figure 2 Overview of generic request and notification process	Does not state this needs to be via email	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG believe that the participant is looking at the marked up version of the procedures as the Figure 2 they are referring to has been removed from the procedures.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
13	CitiPower Powercor	Figure 2: Customer Details Notification process (Notification sent by an Initiator)	Figure 2: Overview of generic request and notification process	In the Initiator lane, second decision states 'Use other method of communication as agreed with Recipient?' CitiPower Powercor suggests that diamond be changed to a step and reworded to 'Send email to Recipient' or 'Send Life Support Notification'.	Refer 12

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
14	CitiPower Powercor	Figure 3: Overview of Customer Details Reconciliation Process	Figure 3: Overview of Customer Reconciliation Process	In comment 'Where Recipient has a NMI flagged as Life Support, but did not receive a CustomerDetailsReconciliation from the Initiator, send a CustomerDetailsRequest with Reason = 'Rec – confirm no LifeSupport', CitiPower Powercor suggests that reason be updated to 'Rec – confirm no Sensitive Load' in line with clause 4.5 Customer Details Reconciliation (g) of the procedure.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – update to confirm no sensitive Load (reconciliation only) to align with schema/ Notes/Descriptions

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
15	Origin		2.2	Process Diagrams Second figure – First step needs to specify that it is an email. This will allow it to flow better into step - *"use other method of communication as agreed with participant".*	Refer 12

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
16	AusNet		Figure 4	The 5 day timeframe to provide a notification from a life support request is longer than the 2 day timeframe for responding to a CDR. The reason for 2 days is not clear, but may align with the 5 day timeframe is the timeframe for the very different life support reconciliation process. However, the reason for the 5 day timeframe in the case of the reconciliation process is to allow adequate time for bulk processing of transactions. Since the transaction outlined in Figure 4 is not a bulk transaction the 5 day timeframe is too long. A more prompt response is required, given the high importance of life support information and the potential for conflicts on life support status between participants.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG update to state best endeavours to respond in 2 but must respond in 5.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
17	Simply		Figure 4	After "Receive Life Support Notification", it should not "End" but should be continued as follows: "Receive Life Support Notification" → "Send Life Support Confirmation/ Rejection" → "Receive Life Support Confirmation/ Rejection" → "End"	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG disagree not acceptance/rejection not required for the request process.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
18	TasNetworks		3.1(f)	Formatting Error: The Timing Periods are defined in 0Table 4 Remove the'0' in front of "Table 4"	2/5/2018 B2BWG agreed. Editorial
19	Origin		3.1 Table 3 (f)	Grammar (f) The Timing Periods are defined in ~~0~~Table 4:	2/5/2018 B2BWG agreed. Editorial
20	Endeavour		Table 4	Providing a Life Support Request timing period Formatting error: The word 'recipient' in the Description of Timing Period column should have an uppercase R.	2/5/2018 B2BWG agreed. Editorial

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
21	Endeavour		3.2.f	Procedure improvement: It is not clear what is the timing obligation for the scenarios highlighted in this clause We suggest that this clause be updated to: [Guidance Note 1] A Current Retailer must send a CustomerDetailsNotification within 5 business days of the following events: (i) the completion of the CATS change of retailer process. (ii) for a new connection, once the site has been energised.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agree clause updated

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
22	Endeavour		4.1.a	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. We suggest adding the following words to the end of clause 4.1.a: This restriction does not apply to the Life Support Notification.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agree. Sentence added to clausee

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
23	Endeavour		New clause 4.1.d and move subsequent clauses down	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 We suggest inserting a new clause of 4.1.d, and moving subsequent clauses down, with the following words: [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	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – clause 4.1 c covers it.

24	Endeavour		4.1.f	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. We suggest update clause 4.1.f to: 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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – f updated This restriction does not apply when a when a retailer receives a life support notification from a distributor.
25	TasNetworks		4.1(g)	Reference error: The reference should be "4.3" and 4.4	2/5/2018

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
					B2BWG agreed. Editorial
26	Endeavour		4.1.g	Reference error: The reference error should be 4.3.2	2/5/2018 B2BWG agreed. Editorial
27	AGL		4.1 (g)	Error in cross reference	2/5/2018 B2BWG agreed. Editorial
28	Origin		4.1 (g)	Grammar (g) The details provided in a CustomerDetailsNotification and SiteAccessNotification must be the current details as at the date and time that the Notification was generated. The *LastModifiedDateTime* may be historical in certain situations. For Life Support changes refer to section ~~and~~ 4.4.	2/5/2018 B2BWG agreed. Editorial

29	Evo		4.1 new clause (i)	Is it assumed that the Initiator of a CDN with “None” to a Recipient that has Life Support flagged , that all Deregistration processes were completed? Evoenergy believes there should be clear responsibility around “Life Support Deregistration” before sending a CDN. Proposed update to clarify new clause wording: [Guidance Note 2] The Initiator must complete all De-registration processes before sending a CustomerDetailsNotification with “None” on a site previously flagged with “Life Support”.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – this clause may cause issue with the CDN process when the CDN is received from a retailer who has a new customer and that customer does not have life support but the previous customer may have had life

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
					support. In this case a deregistration process is not required.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
30	Evo		4.1 new clause (j)	Need to make it clearer that the date field is mandatory for life support. Proposed update to clarify new clause wording: (j) For the DateRequired field, the date should be specified or default to the same day as the request when LifeSupportStatus is not None.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – believe this is covered in Table 9. More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
31	EA		4.2(a) Add clause	Suggest adding “The initiator of the Customer Details Request will always be the current DNSP” for clarification	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – disagree. CDR can be received from other parties other than a DNSP

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
32	Evo		4.3.1	Missing full stops at end of point (d)	2/5/2018 B2BWG Agreed Editorial
33	Evo		4.3.2	Missing full stops at end of point (a) and (c)	2/5/2018 B2BWG Agreed Editorial

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
34	SAPN		4.3.1 (e)	This clause indicates that the DNSP "must" update their records accordingly. SAPN suggested that the "must" be replaced with "may". There are 2 relevant NERR clauses that need to be considered to determine what drives this obligation – 125 (2) (c) – includes "must" within the obligation to update registrations 125 (7) – includes "may" within the obligation to deregister a customer's premise The 2nd clause provides for a scenario where the DNSP "may" decide not to update our records.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agree deleted and the DNSP must update their records accordingly.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
35	Endeavour		4.3.1.e	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. 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. We suggest that this clause be deleted and a new clause be added in as 4.3.2.d – please see our suggestion below.	Refer to 34
36	TasNetworks		4.3.1(e)	The last line of this clause states "…..and the DNSP must update their records accordingly". With reference to the new NERR clause 125(12) it states "A distributor may deregister a customer's premises……" Suggest changing 4.3.1(e) to "may".	Refer to 34

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
37	AusNet		4.3.1 (e)	Guidance Note 2 requirements for the DNSP to update records on receipt of SensitiveLoad value of "None" does not give regard to the minimum 15 business days required to undertake a de-registration process, or consider the situation where the DNSP is the registered process owner of life support. We recommend the following changes to 4.3.1(e). [*Guidance Note 2] Where the requirements for Life Support are no longer appropriate (for example an occupier no longer meets the jurisdictional requirements to be classified as a Life Support customer) a Retailer must:* *- notify the DNSP by way of sending a life support notification; and* *- send a CustomerDetailsNotification containing NMI, LastModifiedDateTime, a MovementType value of "Update" and SensitiveLoad value of "None" to the relevant DNSP ~~and the DNSP must update their records accordingly~~.*	Refer to 34

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
38	AGL		4.3.1(e)	Question whether this clause should be in this section since it is covered off in the Life Support section.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – argreed. Deleted as its duplicated in 4.4.1.e

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
39	EA		4.3.1(e) Modify clause	Guidance Note requires the Sensitive Load Field to be updated to 'None' if Life Support Is removed. There might be instances where the site is previously classified as "Life Support" and "Sensitive Load", does not have a requirement for "Life Support", and still has a requirement for "Sensitive Load". Suggest that the clause is updated to: Where the requirements for Life Support are no longer appropriate (for example an occupier no longer meets the jurisdictional requirements to be classified as a Life Support customer) a Retailer must send a CustomerDetailsNotification containing NMI, LastModifiedDateTime, a MovementType value of "Update", *and if applicable*, SensitiveLoad value of "None" to the relevant DNSP and the DNSP must update their records accordingly.	Refer 40

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
40	AGL		4.3.1(e)	Guidance Note requires the Sensitive Load Field to be updated to 'None' if Life Support Is removed. However, the site may still qualify as 'Sensitive Load'. This clause should be updated to: …..a Current Retailer …. a *MovementType* value of "Update" and *SensitiveLoad* field with a value ~~of "None"~~ updated per clause 4.3.2 to the relevant DNSP and the DNSP ….	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed 4.4.1.e updated with wording.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
41	Simply		4.3.1(e)	This clause should be updated to: ….a Current Retailer …. a *MovementType* value of "Update" and *SensitiveLoad* field with a value ~~of "None"~~ updated per clause 4.3.2 to the relevant DNSP and the DNSP ….	Refer 40
42	Simply		4.4.1(e) (ii)	Per issue in 4.3.1(e). Note both location and extent of clause obligation in relation to DB obligation. For consistency, the clause should be updated to: The current retailer….. a *MovementType* value of "Update" and *SensitiveLoad* field with a value ~~of "None"~~ updated per clause 4.3.2 to the relevant DNSP and the DNSP must update their records accordingly.	Refer to 40 and 34

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
43	AusNet	4.3.1 (e)		Whilst DNSPs are relying on email B2B notifications, removing the need for a phone call in establishing life support registration would reduce protections for life support customers. Email life support transactions could be delayed by IT security arrangements or sent to the wrong email address. Until a non-email B2B transaction solution is established, a phone call should still apply for new life support registrations.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – disagree a bilateral agreement can be put in place.
44	Aurora		4.3.1(e)	4.4.1 (f) (ii) states The DNSP may update however 4.3.1(e) states Must update	Refer 40 & 34

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
45	Energy QLD		4.3.2 (b) Sensitive Load	Energy Queensland's DNSPs, Ergon Energy and Energex, do not utilise the Sensitive Load field for market purposes and its use by a Financially Responsible Market Participant (FRMP) does not provide any additional or material difference to planned site works, unplanned outages or restoration activities. However, we have no objection to the use of the Sensitive Load field within the B2B Procedure for other jurisdictions.	2/5/2018 B2BWG Resonse: Noted

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
46	SAPN		4.3.2	Sensitive Load Field SAPN recommend that “Life Support” be completely removed from the CDN transactions and the new “Life Support Notification” and related processes/transactions be the only transaction used to communicate relevant “Life Support” information between Retailers and DNSP’s. This would result in changes also being required to the “CDR” and “CDN Reconciliation” process/transactions. The current solution creates duplication of the critical “Life Support” status and will cause manual effort for DNSP’s and Retailers when there is a mismatch of information e.g. “Life Support Notofication” indicates that “Life Support” is required and then the CDN does not confirm this status. SAPN only use the “Life Support” status within the “Sensitive Load Field” and do not use “Senstive Load” advice from Retailers. We would therefore recommend that the entire field be removed from the “CDN”. SAPN believe that a single transaction is critical to reduce/remove the risk of communication errors and therefore recommend the email based “Life Support” transaction be solely used until such time the Industry determines the best long term solution i.e. Central Register or New B2B Transaction.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – noted. The B2BWG advise this will be looked at when the long term solution is devised.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
47	TasNetworks		4.3.2(b)	Grammar error: Remove the word “and” after NMI.	2/5/2018 B2BWG Agreed Editorial
48	Endeavour		4.3.2.b	Grammar error: Remove the word ‘and’ from the sentence	2/5/2018 B2BWG Agreed Editorial

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
49	Endeavour		4.3.2.b	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. We suggest adding the following sentence: Note that the Recipient is under no obligation to provide any additional level of service to prevent the loss of supply to the NMI.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – More information will be provided in the guide as part of final determination

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
50	Endeavour		Suggesting new clause 4.3.2.d	Procedure improvement: The procedure should make it clear when the removal of 'Life Support' from the SensitiveLoad field is allowed. We suggest that a new clause be added as 4.3.2.d and with the following words: [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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – not required as the formal notification of deregistration is via the Life Support Notification

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
51	AGL		4.3.3 (a)	For consistent usage and obligations, the clause should be updated to: (a) [Guidance Note 2] If a Site is vacant, the Initiator must send a CustomerDetailsNotification containing *NMI, LastModifiedDateTime*, a *MovementType* value of 'Site Vacant' and *SensitiveLoad* of 'None' to the relevant Recipient who should update their records accordingly.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – updated to who may update their records accordingly

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
52	TasNetworks		4.3.3	Vacant Sites: The current clause suggests it is appropriate for the Current Retailer to send a CDN as “site vacant” once a site is vacated, however, the de-registration period may not have yet expired. It is recommended the clause be updated to: [Guidance Note 2] When a site is vacated; a) If a site is vacated and the de-registration process has not yet been completed, the Initiator must send a CustomerDetailsNotification containing NMI, LastModifiedDateTime, MovementType value of “Site Vacant”, and SensitiveLoad value of “Life Support”, or; If a site is vacated that was not classed as life support, or the Current Retailer has since completed the de-registration process, the Initiator must send a CustomerDetailsNotification containing NMI, LastModifiedDateTime, a MovementType value of ‘Site Vacant’ and SensitiveLoad of ‘None’ to the relevant Recipient.	Refer 51 More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
53	Aurora		4.3.3	Advises to send out a CDN with the sensitive load of "none" which contradicts the 15 day grace period in the rules	Refer 51 More information will be provided in the B2B guide as part of final determination.
54	Evo		4.3.3 Vacant Sites	Evoenergy suggests 'Vacant sites' should have any flagged 'Life Support' De-registered prior to being made vacant. A vacant site can also have a De-energisation SORD sent through at the same time or shortly thereafter. Proposed addition: Before sending a CustomerDetailsNotification for vacant sites, the Initiator must; (a) Complete all De-registration processes, and [Guidance Note 2] Send a Notification containing NMI, LastModifiedDateTime, a MovementType value of 'Site Vacant' and SensitiveLoad of 'None' to the relevant Recipient.	Refer 51 More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
55	Endeavour		4.3.3	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. We suggest that this clause be updated to: [Guidance Note 2] If a Site is vacant, the Initiator must send a CustomerDetailsNotification containing NMI, LastModifiedDateTime and a MovementType value of 'Site Vacant' In addition a new clause be added in as 4.3.2.d – please see our suggestion above.	Refer 52 More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
56	AGL		4.4	Suggest that as this process is driven by e-mail, the first clause (4.4.1) should be a clear statement of the basic protocol that is expected for the e-mail communication process, as suggested below: **4.4.1 E-mail Protocol** a) The transport mechanism for the movement of Life Support Notices is e-mail; b) All initiating notices must be sent to the Recipients Life Support Notifications email address specified in the Retail Operations Contact List (ROCL); c) The initiating notice subject header must be in the form of: 'Life Support Notification # NMI'; d) All responses should be returned to the e-mail address they are received from; e) If a recipient does not respond to a notice, the initiator should contact the Recipient through other means to seek confirmation; And remove unnecessary clauses from each sub section	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: See response 2 in tech del spec area new section created within the transaction section.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
57	Aurora		4.4 (b)	Should it not advise when sending an email that the sender should use their Life support email address as per the ROCL as well as sending it to the ROCL recipient	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – issue discussed the group feel that the critical element is the delivery address more so than the intiating address.

58	Energy QLD		4.4.1 Life Support Notification	The B2B Procedures as currently drafted do not deal with the process for managing multiple Life Support flag requirements for a single NMI, such as a bulk supply point (e.g. a nursing home with 50 customers under a single NMI, of which only five are Life Support). The Procedures need to clarify whether the initiator is expected to provide multiple Life Support notifications against the single NMI as each Life Support customer's name and equipment details will be different. Energy Queensland would appreciate a consultative approach with the B2B Working Group to ascertain a manageable solution for multiple customer relationships under one NMI.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – As a distribution business there is only one customer per NMI so only one life support notification is required. The B2BWG believe this response above does not require

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
					the B2BWG to consult with Energy QLD. More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
59	TasNetworks		4.4.1	TasNetworks recommends adding a new subclause (g) that allows Recipients to order LifeSupportNotifications received. (g) All LifeSupportNotifications are deemed to be LastModified based on the DATETIME the email is received by the Recipient.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
60	SAPN		4.4.1 (a)	SAPN suggest that additional words be included to make it clear that table 5 is a formal template and must be used and data must be provide as presented within the table – data should not be provided in a different order etc.. Emails received that do not conform to the template would be grounds for rejection of the email and require the initiator to resolve the errors and resend.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - New section created after transactions.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
61	Endeavour		4.4.1.a	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. We suggest updating clause 4.4.1.a to: [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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: New section created after transactions

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
62	TasNetworks		4.4.1(b)	Current clause: *"…The email subject header must be in the form of: 'Life Support Notification # NMI'."* Proposed improvement: It is not clear in the procedure as to how participants are to treat the '#' within the email subject of the four notifications. Should participants use: • Life Support Notification # 8000123123 • 'Life Support Notification # 8000123123' • Life Support Notification 8000123123 An example should be provided within the procedure to alleviate any ambiguity. This suggestion applies to the following sections: 4.4.1.b, 4.4.2.a, 4.4.3.a, 4.4.4.a	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – have been provided in section 5.5

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
63	AGL		4.4.1(b)	Clarification –update or delete (per comment above) (b) All ~~initating~~ ~~emails~~ initiating notices must be sent to the Recipients Life Support Notifications email address in the Retail Operations Contact List (ROCL). ~~The email subject header must be in the form of: 'Life Support Notification # NMI'.~~	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed initiating email is changed to initiating notices. Delection not accepted refer to 62

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
64	Endeavour		4.4.1.b	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. We suggest that this clause be updated to: 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.	Refer 62

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
65	TasNetworks		4.4.1(b)	For consistency, the procedure should detail the format/layout that the emails should be provided between parties, or provide a proforma template for each email message type.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: Same as Red/Lumo suggestion in general comments.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
66	EA		4.4.1(c)	Clarity to clauses on flagging life support. Retailers might have different practices in flagging/unflagging life support customers when notified of a life support requirement on a future date. Suggest modifying 4.4.1(c) as below: (c) In addition to (a), where the Retailer is the Current Retailer or becomes the Current Retailer, they must send a CustomerDetailsNotification advising of life support. In this case, the changes are effective from the ~~earliest date~~ earlier of the dates notified between the parties in the CustomerDetailsNotification or LifeSupportNotification.	Refer to 68
67	AGL		4.4.1(c)	Clarification of statement (c) In addition to (a), where the Retailer is the Current Retailer or becomes the Current Retailer, they must send a CustomerDetailsNotification. In this case, the changes are effective from the earliest date notified ~~between the parties.~~ notified by the initiator in the Life Support Notification or CustomerDetailsNotification.	Refer to 68

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
68	TasNetworks		4.4.1(c)	Current clause: *In addition to (a), where the Retailer is the Current Retailer or becomes the Current Retailer, they must send a CustomerDetailsNotification. In this case, the changes are effective from the earliest date notified between the parties.* This statement does not align with the DateRequired field within the Life Support Notification. The changes should be effective from whichever is earlier out of the DateRequired in the Life Support Notification or the receipt of the CustomerDetailsNotification. Proposed improvement: *In addition to (a), where the Retailer is the Current Retailer or becomes the Current Retailer, they must send a CustomerDetailsNotification. In this case, the changes are effective from whichever is earlier of:* *i) The DateRequired in the Life Support Notification; or* ii) *The receipt of the CustomerDetailsNotification*.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG agreed

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
69	AusNet		4.4.1 (c)	AusNet Services considers clause 4.4.1(c) does not adequately describe the date as to when a prospective life support notification is required, and recommends: *The changes become effective from the earliest date notified:* *- in the "daterequired" field in the "life support notification" transaction; or* *- the date of receipt of a CDN transaction indicating the need for life support registration.*	Refer to 68
70	Origin		4.4.1 (c)	There needs to be a definition of what is meant by earliest date as it may have different meanings for participants and dependant on what transaction is being sent. Suggesting - *"the date provided by the initiator in either the life support email notification or CustomerDetailsNotification which is earliest"*	Refer to 68
71	Endeavour		4.4.1.d	Procedure improvement: The term 'Life Support Notification' should be used to make it clear that a Life Support Notification is required. We suggest that this clause be updated to: [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.	2/5/2018 B2BWG Resonse:B2BWG - agreed

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
72	EA		4.4.1(e)(i)	Suggest modifying clause for clarity and consistency: (i) They must send the other party ~~an email~~ a notification as specified in (a)	Refer to 73
73	TasNetworks		4.4.1(e)(i)	Suggest adding the word "promptly" between "must" and "send" to add some context to when the email needs to be sent.	2/5/2018 B2BWG Resonse: B2BWG - agreed
74	Endeavour		4.4.1.e.i	Procedure improvement: The term 'Life Support Notification' should be used to make it clear that a Life Support Notification is required. We suggest that this clause be updated to: they must send the other party a Life Support Notification	2/5/2018 B2BWG Resonse: B2BWG agreed. And deleted as specified in (a)
75	AGL		4.4.1(e)(i)	Clarification: (i) they must send the other party a notice ~~an email~~ as specified in 4.4.1(a)	Refer to 73

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
76	AGL		4.4.1(e) (ii)	Per issue in 4.3.1(e). Note both location and extent of clause obligation in relation to DB obligation. For consistency, the clause should be updated to: The current retailer….. a *MovementType* value of "Update" and *SensitiveLoad* field with a value ~~of "None"~~ updated per clause 4.3.2 to the relevant DNSP and the DNSP must update their records accordingly.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed but used may and not must

77	EA		4.4.1(e)(iii)	Same as above, clarity to clauses on flagging life support. Retailers might have different practices in flagging/unflagging life support customers when notified of a life support requirement on a future date. Suggest modifying clause to: The changes are effective from the later of the dates specified in the ~~email notification~~ notification in e(i) or the CustomerDetailsNotification in e(ii).	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed with changes The changes are effective from the the date required field in the Life Support Notification. Updated definition in the transaction.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
78	AusNet		4.4.1 (e)	AusNet Services considers clause 4.4.1(e)(iii) misrepresents the NERR requirements. Under no circumstances should deregistration of life support customer be prospective. The drafting of the procedures encourages non-conformance to the Rules. We recommend: *4.4.1(e)(iii) the changes made by the recipient are effective from the date the email is received* In preference to: *4.4.1(e)(iii) the changes are effective from the date specified in the email notification.*	Refer 77
79	Endeavour		4.4.1.e.iii	Procedure improvement: The term 'Life Support Notification' should be used to make it clear this clause is related to a Life Support Notification. We suggest that this clause be updated to: the changes are effective from the date specified in the Life Support Notification	Refer 77
80	Origin		4.4.1 (e) iii	To keep this section consistent with 4.4.1 (b) and (c) the date should not be effective from the date provided in the email notification rather the latest date provided in either the email or CDN. As above the date which is to be used needs to be needs to be clearly defined.	Refer 77

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
81	AGL		4.4.1(e)(iii)	Clarification (iii) the changes are effective from the date specified in the notice provided in 4.4.1(a) ~~email notification~~.	Refer 77
82	Origin		4.4.1 (e)	Change iii to ii.	reject
83	Endeavour		4.4.1.f	Procedure improvement: It should be made clear that a de-registration notice can only be provided when the de-registration process was successfully completed. We suggest rewording [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:	2/5/2018 B2BWG Resonse: B2BWG – disagree. This is a prospective retailer advising that they never completed the registration process as the customer never either resided at the property or they never completed the transfer with that retailer.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
84	AGL		4.4.1(f)	Clarification (f) [Guidance Note 1] Where the Retailer, who is not the Current Retailer, has provided information to the DNSP required in 4.4.1(a) and no longer requires life support registration: (i) The Retailer must send the DNSP an email as specified in (a) with the *LifeSupportStatus* value of 'Deregistered – Customer Notified' and (ii) The DNSP may update their records accordingly.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – updated the clause to include Life Support Notification instead of (a)

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
85	Endeavour		Suggesting new clause 4.4.1.g	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 then 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. 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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – believe this may breach privacy act regarding customer information.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
86	Endeavour		Table 5	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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWB - agreed

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
87	Endeavour		Table 5	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. We suggest adding a new field in table 5 as follows: Field: LastModifiedDateTime Format: DATETIME Use: M Definition: Date and time that the information was updated in the Initiator's system	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – disagree If multiple emails are received a discussion should be had with the parties to define the latest email.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
88	Endeavour		Table 5	SiteAddress 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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – this field is an optional field

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
89	Endeavour		Table 5	LifeSupportStatus Procedure improvement: The field length needs to be increased to accommodate the allowable values. We suggest changing the format of LifeSupportStatus to VARCHAR(50)	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agreed

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
90	TasNetworks		Table 5	Table 5 Data Requirements for Life Support Notification Life Support Status field - Deregistered – No Customer Confirmation – It is not clear as to when this value would apply and it does not seem to align with any scenario outlined in the corresponding rule change.	B2BWG – changed to No Customer Response More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
91	AGL		4.4.1 Table 5	For LifeSupportStatus should the allowable value of 'Registered – Customer Notified' be changed to 'Deregistered – Customer Advice' to make it clear that the reason for the deregistration is advice from the customer, rather than a notice sent to the customer.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agreed

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
92	Endeavour		Table 5	LifeSupportStatus 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 We suggest removing 'Registered - Medical Confirmation' as an allowable value, and adding the following as allowable values: Registered - Medical Confirmation with network Registered - Medical Confirmation with retailer We also suggest adding the following note: '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. '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.	B2BWG – agreed. More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
93	AusNet		Table 5	AusNet Services has identified that life support status field values in the initial procedures are a combination of statuses and reasons. We recommend the "life support status"; "medical confirmation" and the "reason" should be separate fields. The "life support status" values should be: • Registered with Life Support • None The "medical confirmation" values should be: • No medical confirmation provided • Medical confirmation provided The "reason" values should be: • Registered – customer notified • Registered – DNSP registration process owner notified • Deregistered – No Medical Confirmation • Deregistered – No customer confirmed • Deregistered – Customer notified The reason values in red font are new recommended reason fields that distinguish between a registrations associated with customers notifying retailers and the situation where the DNSP is the registration process owner notifying a new retailer.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - disagree

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
94	TasNetworks		Table 5	Table 5 Data Requirements for Life Support Notification Proposed Improvement: A new mandatory field should be added to the Life Support Notification of 'Notification Reason'. The allowable values should be: - 'New' - 'Update' - 'Remove' This would make it much clearer as to the intent of the notification and facilitate more efficient business processes upon the receipt of Life Support Notifications.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agree

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
95	TasNetworks		Table 5	Table 5 Data Requirements for Life Support Notification. Query: DateRequired field – Is this required to be populated in response to a Life Support Request?	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – new statement added to table.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
96	Red/Lumo		Table 5	Suggest we include clarification around the Date required field use and definition,	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed Changes made to that section

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
97	AusNet		Table 5	The DateRequired field is currently presented as Required and hence only needs to be provided when it is available. The DateRequired should always be available. Therefore we recommend changing it to mandatory in a B2B transaction or B2B email.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – disagree Field is already M/N

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
98	Endeavour		Table 5	DateRequired Procedure improvement: The definition should use the word ‘mandatory’ instead of ‘required’ to align with the Use field We suggest that last sentence be updated to: Not mandatory when LIfeSupportStatus is None	See 97

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
99	Endeavour		Table 5	DateRequired 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. We suggest adding the following to the definition of the DateRequired field: 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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – disagree It is the date the life support is required and should not be linked to a transfer or reading date

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
100	Evo		Table 5	DateRequired: Date should be specified or default to the same day as the request.	B2BWG see 97
101	AGL		4.4.1 Table 5	Definition Date when life support equipment is required or deregistered This information will require some clarity in how the information is provided. For a network, the relationship is with a FRMP, so the date will be relevant only to the two parties. For an incoming retailer it could be an in situ transfer or move in. For an in-situ transfer, the date required (unless specifically advised by the customer) should be the date the customer provides advice. This will in turn prompt a process between the Network and FRMP to confirm currency of life support requirements. For a move in, the date required is the move-in date.	B2BWG see 97

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
102	TasNetworks		Table 5	Table 5 Data Requirements for Life Support Notification • LSEquipment field – Currently the use of this field is R/N Proposed Improvement: An allowable value of “Unknown” should be added to the list, and the LSEquipment field use should be made M/N. As the procedure currently stands, the field is only REQUIRED. Under the definition, ‘Required’ means this information must be provided if available. If the information is not available (e.g. the customer does not know), then the initiator should be able to populate “Unknown”. In which case, the field would be better defined as M/N.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – disagree Field already allow for this to be blank if equipment is unknown

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
103	AGL		4.4.1 Table 5	Grammar and Enhancement LSEquipment – Other 'Other' means ~~an~~ equipment that a registered medical practitioner certifies is required for a person residing at the customer's premises for life support and is not already listed above. If suggestion below is not used – then it is suggested that the following be added to other Details of the required equipment must be provided in this field when other is used.	B2BWG – see 105
104	Aurora		Table 5	Where it states other – should the sender include the actual type of equipment as well as the list is not extensive and may be usefull to include for future proofing	Refer 105

<table>
<tr><th>Reference No</th><th>Participant Name</th><th>Old Clause No</th><th>New Clause No</th><th>Comments</th><th>IEC Response</th></tr>
<tr><td>105</td><td>AGL</td><td></td><td>4.4.1 Table 5</td><td>For consistency with other B2B notices, an additional field called SpecialNotes should be added to this table with the following characteristics:
<table><tr><td>SpecialNotes</td><td>VARCHAR(240)</td><td>O/M</td><td>Any additional information the Initiator wishes to convey to the Recipient. Mandatory if Reason is “Other” and must include details of the equipment required by the medical practitioner.</td></tr></table>
If this suggestion is used, the field width for LSEquipment could be reduced to 50 characters.</td><td>16/5/2018 B2BWG Resonse:

The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained.

2/5/2018 B2BWG Resonse:

B2BWG - agreed</td></tr>
</table>

<table>
<tr>
<td>106</td>
<td>Simply</td>
<td></td>
<td>Table 5</td>
<td>
<table>
<tr>
<td>LSContact Email Address</td>
<td>VARCHAR(40)</td>
<td>R/M</td>
<td>Replace with below:

Must be the email address of the person who is the life support contact for the management of outages and supply issues for this connection point.</td>
</tr>
</table>
</td>
<td>16/5/2018 B2BWG Resonse:

The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained.

2/5/2018 B2BWG Resonse:

Refer 107 B2BWG – disagree

This is the Life support contact to be used for life support information. The outage contact could be the same or could be different.</td>
</tr>
</table>

107	AGL		4.4.1 Table 5	LSContactEmailAddress Add to description for consistency with CSDN: Must be the email address of the person who is the contact for the management of Life Support requirements where the Initiator has obtained Explicit Informed Consent for the purposes of contacting the person for supply outages and other issues associated with the account.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed with amendment. Procedure updated Must be the email address of the person who is the contact for the management of Life Support requirements where the Initiator

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
					has obtained Explicit Informed Consent for the use of the email address. ~~for the purposes of contacting the person for supply outages and other issues associated with the account.~~

108	Energy QLD		Table 5 Data requirements for LS Notification – NEW data requirement	Energy Queensland proposes an additional Life Support field of 'Preferred method of contact' which will allow participants to ensure their Life Support customers are receiving written communication of planned or unplanned interruptions via the most effective method (e.g. postal address, street address or email address).	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agree Clarification: We have added this but this has only been added to the Life Support Contact details. Life support contact details could be different to outage contact details that

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
					you receive via the CDN. This preferred method should only be used for the Life Support Contact regarding any information on Life Support.
109	CitiPower Powercor		4.4.1. Life Support Notification Table 5 Data Requirements for Life Support Notification	In this notification field *LifeSupportStatus* has a number of allowable values. CitiPower Powercor seeks clarification on when value of 'None' should be used? It appears that 'None' and 'Deregistered – Customer Notified' options would be used for the same scenario, if so one should be removed.	B2BWG – the use of None is to be used when the party does not have a current life support registration. More information will be provided in the B2B guide as part of final determination.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
110	TasNetworks		4.4.2(a)	Current clause: *"Life Support Confirmation emails must be sent to the email address it was received from. The email subject header must be in the form of: 'Life Support Notification # NMI # Confirmed'."* The current wording is unclear. The Life Support Confirmation must be sent back to the email address that the Life Support Notification was received from. Proposed improvement: *"Life Support Confirmation emails must be sent to the email address the Life Support Notification was received from. The email subject header must be in the form of: 'Life Support Notification # NMI # Confirmed'."*	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agreed

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
111a	Endeavour		4.4.2	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. We suggest deleting clause 4.4.3 and updating clause 4.4.2 to: 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. The Initiator of a Life Support Notification that was rejected must review the rejection and take appropriate action.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agree Procedure updated with amendments to suggested wording.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
111b	AusNet		4.4.2(b)	AusNet Services considers that life support notifications may be legitimately rejected for a number of reasons, where the information provided is inaccurate and does not identify a premise (e.g. NMI maybe on another DNSPs network). We suggest the following wording: *Life support confirmation/rejection is to be sent within 1 business day.*	2/5/2018 B2BWG Resonse: B2BWG – agree Refer 111a
112	AusNet		4.4.3(a)	AusNet Services considers that including the reason for rejecting a life support notification in the email subject line puts important information at risk of not being read by the recipient. The email subject could be truncated information. For such important information relating to the reason for rejecting a life support notification, we recommend the reason be included in a field within the email. The email for confirmation/rejection email notifications and the message contained with the email should be subject to a defined structure. Only with structured message content can businesses automate and reduce manual work.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agreed

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
113	TasNetworks		4.4.3(a)	Current clause: *"Life Support Rejection emails must be sent to the email address it was received from. The email subject header must be in the form of: 'Life Support Notification # NMI # Rejected # Reason.'* The current wording is unclear. The Life Support Rejection must be sent back to the email address that the Life Support Notification was received from. Proposed improvement: *"Life Support Rejection emails must be sent to the email address Life Support Notification was received from. The email subject header must be in the form of: 'Life Support Notification # NMI # Rejected # Reason.'*	2/5/2018 B2BWG Resonse: B2BWG agree Refer 111a
114	CitiPower Powercor		4.4.3 Life Support Rejection	CitiPower Powercor suggests the procedure should include a list of reasons/scenarios about why a notification is rejected to ensure consist practises are adopted across the industry.	2/5/2018 B2BWG Resonse: B2BWG – agree this is the list of existing event codes in the procedure

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
115	Endeavour		4.4.4.a	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. We suggest updating clause 4.4.4.a to: [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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: Refer to 5
116	AGL		4.4.4(a)	Grammar [Guidance Note 1] Where a party requires confirmation of~~n~~ 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 # NMI'.	2/5/2018 B2BWG Agreed Editorial

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
117	TasNetworks		4.4.4	Life Support Request process The Procedure is not clear regarding: A) What parties are permitted to generate Life Support Requests; and B) What parties are permitted to respond to Life Support Requests. Proposed improvement: An additional three clauses should be added to section 4.4.4 as follows: a) Only Current Retailers and DNSPs are permitted to raise Life Support Requests b) Only Current Retailers and DNSPs are permitted to respond to a Life Support Request with a corresponding Life Support Notification. c) The party responding to a Life Support Request does not need to be the Registration Process owner.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agreed

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
118	TasNetworks		4.4.4	Life Support Request process The Procedure does not facilitate the rejection of Life Support Requests. Direction should be provided as to under what conditions a Life Support Request can be rejected, and the mechanism for doing so.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed New clause added

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
119	TasNetworks		4.4.4	Life Support Request process The Procedure is not clear regarding where a Life Support Notification in response to Life Support Request must be sent. Proposed improvement: Add another clause to section 4.4.4: *"Life Support Notifications in response to Life Support Requests must be sent to the email address the Life Support Request was received from."*	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed with amendment

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
120	TasNetworks		4.4.4	Life Support Request process The Procedure does not detail the email subject header for the Life Support Notification in response to the Life Support Request. It is recommended an additional clause be added to allow parties to differentiate from a standard Life Support Notification to one being received in response to a Request. Proposed improvement: Add another clause to section 4.4.4: "The email subject heading for the Life Support Notification in response to a Life Support Request must be in the form of: 'Life Support Notification Response # NMI'."	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agreed

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
121	TasNetworks		4.4.4(c)	Formatting error: *[Guidance Note 1] The Recipient of the Life Support Request must provide a Life Support Notification and sent within 5 business days.* Proposed improvement: Delete "and sent"; *[Guidance Note 1] The Recipient of the Life Support Request must provide a Life Support Notification ~~and sent~~ within 5 business days*	2/5/2018 B2BWG Agreed Editorial
122	AGL		4.4.4(c)	Grammar (c) [Guidance Note 1] The Recipient of the Life Support Request must provide a Life Support Notification ~~and~~ ~~sent~~ within 5 business days.	2/5/2018 B2BWG Agreed Editorial
123	Origin		4.4.4 (c)	Grammar (c) [Guidance Note 1] The Recipient of the Life Support Request must provide a Life Support Notification and ~~sent~~ within 5 business days.	2/5/2018 B2BWG Agreed Editorial
124	Red/Lumo		4.4.4(c)	*(c) [Guidance Note 1] The Recipient of the Life Support Request must provide a Life Support Notification ~~and~~ ~~sent~~ within 5 business days*.	2/5/2018 B2BWG Agreed Editorial

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
125	Endeavour		4.4.4.c	Formatting error: The words 'Life Support Notification' should be underlined	2/5/2018 B2BWG Agreed Editorial

126	Endeavour		4.4.4.c	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. We suggest updating clause 4.4.4.c & 4.4.4.d to: 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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed Refer 120

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
127	AusNet		4.4.4 (c)	As indicated above in our comment for Figure 4, the 5 day timeframe to provide a notification from a life support request is longer than the 2 day timeframe for responding to a CDR. The 5 day timeframe is the timeframe for the very different life support reconciliation process. The reason for the 5 day timeframe in the case of the reconciliation process is to allow adequate time for bulk processing of transactions. Since the transaction outlined in 4.4.4(c) is not a bulk transaction the 5 day timeframe is too long. A more prompt response is required, given the high importance of life support information and the potential for conflicts on life support status between participants.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agreed Refer to 16
128	AGL		4.4.4(d)	Clarification (d) If a Life Support Notification is not received after 5 business days the Initiator may contact the Recipient	Refer 16

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
129	Red/Lumo		4.4.4(d)	*(d)* If a Life Support Notification is not received after 5 business days the Initiator may contact the Recipient	Refer 16
130	Endeavour		New clause 4.4.4.i	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. We suggest adding a new clause 4.4.4.i with the following words: An Initiator must only send a maximum of one Life Support Request per NMI per day.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agreed

131	Tango	4.4	4.5	The Procedures, as drafted, do not seem to address impacts to the Customer Details Reconciliation process specified in clause 4.5. Clause 4.5 (b) advises that Retailers must conduct the Customer Details Reconciliation with the DNSP/s at least four times per year for NMIs with Life Support. Given that both the Retailer and the DNSP are now responsible for maintaining Life Support Registers, it would be reasonable to suggest that this transaction should also be addressed.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – believe the reconciliation process stays as is as life support is still a field in the CDN. It will still be intiated by the retailer with data discrepancies being corrected/updated

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
					by current practices.

132	Evo		4.5	Additional clarity required to identify the party responsible for reconciliation. Intent suggests it is the party that holds the registration, in the event of a discrepancy between parties e.g.: retailer and DNSP, please clarify which party is deemed the source of truth.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – believe the reconciliation process stays as is. It will still be intiated by the retailer with data discrepancies being corrected/updated by current practices.
133	TasNeworks		4.5(e)	Formatting error:	2/5/2018

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
				Table reference should be Table 11, not Table 12.	B2BWG Agreed Editorial
134	Endeavour		4.5.e	Reference error: Reference to table 12 should be table 11	2/5/2018 B2BWG Agreed Editorial

135	Endeavour		4.5.e	Procedure improvement: The reconciliation process should include the new Life Support Request process. We suggest updating the last sentence to: 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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – believe the reconciliation process stays as is. It will still be intiated by the retailer with data discrepancies being corrected/updated by current practices.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
133	Endeavour		4.5.f	Procedure improvement: The reconciliation process should take into consideration the de-registration process We suggest updating the last sentence to: 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.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – clause amended but evidence of de-registration notice not added

Reference No	Participant Name	Old Clause No	New Clause No	Comments					IEC Response
134	Simply		5.1 Table 6		Reason	VARCHAR(40)	M	Allowed values • Returned Mail • Missing Customer Details • Confirm Life Support • No response to rejected CDN • Transfer Complete, no CDN Received • New Connection, no CDN Received • Data Quality Issue • Other • Rec – confirm no LifeSupport (Reconciliation only) "Rec - confirm no SensitiveLoad" means the DNSP/ has a NMI is flagged for Life Support, but it was not included in the CustomerDetailsReconciliation transaction(s) provided by the Retailer. Please update the above highlighted as per the correct schema value.	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – update to confirm no sensitive Load (reconciliation only) to align with schema/Notes/Descriptions

Technical Delivery Spec

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
1	Red/Lumo	*B2B Technical Specification - Delivering NEM B2B Transactions via e-mail* 2.4, 2.4.2, 2.4.3	Update existing if still deemed required: *B2B Technical Specification - Delivering NEM B2B Transactions via e-mail* ***and/or;*** *B2B Procedure Customer Detail and Site Notification* *(Suggest new subsection under 4.4.6)*	Currently on AEMO's website is NSW B2B Procedure documents published at the request of the NSW Government. Since the introduction of Power of Choice related procedure changes we understand this may no longer be relevant however, the currently published document (refer to Old Clause Column) details process related business rules and technical delivery formats relating to issuing of B2B transactions through email (such as CDN) that we believe may also be useful in application for this process in particular; • 2.4.2 and 2.4.3 (old Clause) this could be considered a new clause relating to Contingency event where email is unavailable, suggested wording is: ***4.4.6 Use of Telephone or Fax in Contingency Situation*** *Life Support transactions can be faxed where:* *i) Email is unavailable (i.e. as a backup to the email process); or* *ii) There are issues with the timeliness of delivery* *A participant may also elect to phone the recipient to ensure and confirm;* i) *confirmation of life support required date is deemed urgent (i.e. same day); or* ii) the delivery of notification in contingency situation	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agree

2	Red/Lumo	B2B Technical Specification - Delivering NEM B2B Transactions via e-mail 3.1,3.2.1 and 3.2.2	Update existing if still deemed required: *B2B Technical Specification - Delivering NEM B2B Transactions via e-mail* ***and/or;*** *B2B Procedure Customer Detail and Site Notification* *(Suggest new subsection under 4.4.5 Technical Delivery Details Life Support Transactions)*	Red and Lumo believe the format of the email including a template example should be provided to ensure consistency in the market, this will also enable participants to manage their systems to process these transactions, setup validation and ensure security of the information contained in the email. We believe this should be included as a procedure item or a Guidance Note 1 to support consistency and reduce erroneous transactions, the risk of not defining this or providing a B2B template will result in multiple variances between participants. ***4.4.5 Technical Delivery Details Life Support Transactions*** *The following relates to the transmission of Life Support Transaction files via email between market participants as a guide.* ***(a) Format of transactions via CSV or Email Body*** *Where a transaction is sent in the body of the email message they should:* *(i) The message is to be structured as a list of the relevant fields, as described in Table 5* *(ii) Field names and field sizes are to be consistent with the relevant Transaction data requirements.* *(iii) Fields are to be in the same order as listed in the Table 5.* *(iv) All relevant fields are to be included (i.e. the field names for optional or required even if no information is provided)* *3Where a transaction is sent as an attachment to an email;*	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG – agree but remove the attachment of a CSV. B2BWG agree that all information will only be in the email body.

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
				(i) Each email must have no more than one attachment. (ii) Where a B2B transaction is included in an email as body content, there should be no attachment unless bilaterally agreed between participants. (iii) Adhere to CSV detail in accordance with 4.1 Figure 6 Example of Life Support Notification Template	

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
3	Red/Lumo	B2B Procedures: Technical Delivery Specification 5.1(a)(I)		Reference to B2B Procedure Customer and Site Details needs to be updated to new clause number; (*I) The delivery method for the use of the CustomerDetailsReconciliation Transaction, must be in accordance with clause ~~4.4 (c)~~ 4.5 of the B2B Procedure Customer and Site Details Notification Process.*	16/5/2018 B2BWG Resonse: The B2BWG response below was determined as part of the initial consultation review feedback, but due to the IEC decision to move to a transaction with LVI capability, where the comment is appropriate for a transaction this has been retained. 2/5/2018 B2BWG Resonse: B2BWG - agree

Alternative option for interim measure

Energy Queensland

While Energy Queensland appreciates that a decision has already been made by the Information Exchange Committee (IEC) to implement the email solution as an interim measure while longer term solutions are explored, we make the following suggestion as a potential alternative option. Rather than using off-market processes which bring additional risk with respect to life support management and are significantly more labour intensive to manage, Energy Queensland proposes that participants continue to use the existing CDN exchange of the Life Support flag (addition and removal). This process could be complemented by the registration process owner providing a completed medical certificate when it is received from the Life Support customer to the relevant participant, i.e. a copy (.pdf) or the details (.xls or .xml). This alternative process would ensure that the customer's Life Support status is flagged and reduce the administrative burden.

Long Term Options Response

SAPN

Option 2 - Central Repository

SA Power Networks endorse the progress of a Central Repository as the long term solution. This solution provides industry with the best option to create a single source of truth for this critical information regarding "Life Support" customers.

ACUMEN

Acumen is in support of Option 2 – Central Repository. Given the other market challenges facing us in the future i.e 5 minute interval data and the need for market information to be more closer to real time, it makes sense for this opportunity to be explored, potentially as part of the broader Standing Data objective. It also ties in very nicely with MC's being able to conduct NMI discovery.

EA

EnergyAustralia's preference is to continue with B2B processes, and for implementation of a robust B2B solution that involves changes to the CDN and creating an automated life support notification.

This would involve:

- Creating an automated Life Support notification which contains the additional information relating to life support required (as contained in Table 5 of the proposed changes to the B2B Procedure: Customer and Site Details Notification Process) which can be sent to the distributor or prospective retailer, and
- making changes to the CDN to remove "Life support" value from the Sensitive Load field, and to create a mandatory (Y/N) field for life support which then triggers the LS-OWN

Our view is that Option 2 is more complex to implement, and that Option 1 is a a simple and cost effective way that will achieve a robust method of complying with the requirements, and will allow for robust implementation and testing for the proposed timeframe of end 2019.

Notwithstanding, we are in favour of considering changes to MSATS or a central repository, particularly if this fits into any future major changes to MSATS in the longer term.

TasNetworks

TasNetworks preference for a long term solution is Option 1, the creation of a new B2B Transaction(s) to support Life Support communications.

TasNetworks considers option 1 is more tenable for the following reasons:

- The existing B2B Customer And Site Details Notification Process required to support Option 1 could be modified to support this option without having to implement a new process and/or modification to other AEMO procedures and processes to support the central repository model.
- There would not be any requirement for AEMO to build a technical solution to implement a central repository.
- The notifications between participants would emulate current B2B procedures for delivery and receipt directly between participants and would not rely on any intermediatory functionality.
- The central repository option may need to be subject to strict access and confidentiality/privacy principles, particularly for prospective parties who may not have a need to the information held in the central repository.

- The central repository will still require the development of new transaction types to enable parties to send data to, and receive data from the repository, and as such may require increased implementation costs from participants than transactions which could emulate existing B2B processes.
- The introduction of a central repository model may have a greater impact of change on existing business processes for participants than the introduction of B2B transactions which would be aligned to the processes modified for the use of the interim email solution.

TasNetworks also considers that whatever option is adopted, the Life Support value within the SensitiveLoad field in the existing CustomerDetaislNotification should be removed to avoid duplication and misinterpretation of information. This will have downstream impacts on the existing Reconciliation Process and will need to be modified accordingly

Endeavour

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.

AGL

In consideration of the long-term solution there are a number of criteria which must be considered.

The next stage options are presently a B2B aseXML transaction or a Centralised Life Support database. The EIC in their determination have required a permanent solution for this matter to be in place by end 2019.

In order for a permanent solution to be in place by late 2019, then key decisions will need to be made shortly to allow appropriate design and implementation.

B2B Transaction

If the decision is to continue with B2B, then the necessary changes to convert the process to an B2B AseXML transaction basis will need to commence within a short period, so that the procedural component is completed by late 2018/early 2019, to allow industry time to build and test the transaction for late 2019.

The B2B transaction is likeliest the cleanest and quickest long term solution that can be delivered by late 2019. The current work that has been undertaken provides a strong foundation for conversion to a transaction.

Centralised Database

If the outcome is to be a centralised database, then there are a number of considerations which must be taken into account in the scope of works, including auditability, responsibility and operability.

Work would need to be undertaken to develop the design and data upload mechanisms and specifications, as well as an extensive test and implementation plan. Various market and customer scenarios should be developed to test the operation of a centralised facility.

Further, consideration needs to be given as to whether this facility would cater for gas customers as well as electricity customers, given that the life support obligations are agnostic of energy type.

Tango

With regard to the longer term solution – Central Repository or B2B Transaction, Tango provides the following:

1. The solution should consider leveraging existing systems, transactions and processes to ensure minimal and cost effective change.
2. It is suggested a holistic approach to the solution be adopted. B2B, MSATS and other AEMO projects (e.g. Standing Data Project) that could provide a solution for life support processes be considered.

3. The solution should address all life support requirements and not be restricted to just addressing the NERR changes. This includes how participants (MCs, MPs - new and current), other than the Current FRMP and DNSP, who can de-energise a premises are involved in the process.
4. Consideration to be given to the Reconciliation process as there are now two parties (Retailer and Distributor) who are responsible for registering life support as well as other key parties (see 3. above).
5. All solutions under consideration should be detailed, giving consideration to scope of change, complexity of implementation and cost.
6. A consideration in all solutions put forward is the solution's ability to meet the requirements of the NEO and B2B principles and Factors. The chosen solution must meet these requirements.

Origin

Option 1: B2B Transaction

The creation of a new B2B Transaction is a clean method of delivery for life support information between market participants. It does allow for automation and auditability for participants however work would be required to map the transaction flow. Consideration also needs to be given in terms of timings of delivery as participants would require to build the transactions as well as test.

AEMO procedures would also need to be updated and confirmation required whether the email process would need to continue should B2B transaction be the preferred option.

Option 2: Central Repository

A central repository would offer a significant benefit to industry as a whole as it would create one source of truth for Life Support information across Retailers and Distributors.

This option however needs to be analysed further and a detail planned developed as it would be a large piece of work for industry due to the number of activities that need to be performed i.e. bulk migration of current life support information and how information is sent/received to and from the repository etc.. AEMO would also need to confirm if they would use an already existing repository or create a new one for the purpose of life support.

With an implementation date due end of 2019, a clear plan and direction prescribed by the IEC is needed to ensure rollout of the preferred option is successful.

Energy QLD

Energy Queensland supports further exploration of Option 2 which considers the development of a central repository for life support information that will provide the current FRMP / LNSP with the ability to create, update, remove and reconcile life support information. To complement the central repository, Energy Queensland also suggests that consideration should be given to including the Life Support flag in the standing data stored for each NMI (and removing it from the existing Customer Detail Notification (CDN)).

In exploring the possibility of having the Life Support flag included as NMI standing data, consideration should be given to the following:

1) Removal of Life Support from CDNs and management via the CATS process.

2) The creation of two separate Life Support flags so that it is understood who the registration process owner is, i.e.:

i. FRMP initiated LS flag = 'FRMP LS'; and

ii. DNSP initiated LS flag – 'DNSP LS'.

3) The use of the existing CR5055 by the FRMP to manage and maintain the Life Support flag (which will require minor modifications to include the Life Support field).

4) The use of CR5051 by the LNSP to manage and maintain the Life Support flag which will require minor modifications to include the Life Support field.

5) Making the Life Support flag a discoverable field in the NMI Discovery process to ensure market participants are fully aware of Life Support implications. This includes pending / prospective market participants.

6) Making a new report available in MSATS that will provide the NMI and certified Life Support flag to enable reconciliation processes with the central repository extracts. This report should only be available to participants who are a party to the NMI.

In developing a central repository, Energy Queensland considers that the following should be considered:

1) The repository should be used to upload registration details for audit purposes by the registration process owner (FRMP/DNSP).

2) All participants who are parties to the NMI must have access to the repository and be able to view Life Support details.

3) The repository should have the ability to receive updates from MSATS to maintain participant relationships, NMI status and NMI Life Support status updates. If the Life Support NMI standing data flag is removed within MSATS, the Life Support details contained within the register should automatically be made inactive and archived.

4) If the NMI status is 'D' for any Life Support flagged NMI, this would enable the AER an auditing platform in relation to wrongful de-energisations of Life Support customers.

5) The repository should be maintained by the registration process owner, including date and status of registration, equipment details, medical practitioner details, life support contact details and the initiating Market Participant ID.

6) The repository should allow all associated parties to download full registration details on an ad hoc basis to enable internal reconciliation processes with host systems as needed.

7) The repository should have the ability to generate notifications (FTPs) to all parties when a change to records is detected.

8) The repository should enable data uploads of defined file format by user or FTP, such as new registrations or changes to Life Support details.

9) The repository should enable new FRMPs, the LNSP and incumbent FRMPs (following a failed transfer completion) to identify unvalidated / incomplete registration applications based on the current 'Registration status'.

Energy Queensland considers that this solution would assist in improving the accuracy of retailer and distributor life support registers, an issue which was highlighted in the Australian Energy Regulator's recent rule change request. This change would make the Life Support flag visible to all participants and support a more auditable reconciliation process when used in conjunction with the central repository. Validating the Life Support NMI standing data flag against the Life Support details held within the central repository would improve the accuracy of Life Support information and provide greater assurances to all participants.

Energy Queensland considers the above proposed solution would support the Australian Energy Market Commission's final strengthening protections for customers requiring life support equipment rule change by:

- Making additional Life Support details visible to all participants;

- Providing validation of registration;

- Ensuring that the Life Support flag is used for its intended purpose; and

- Allowing greater sharing of information to fulfil both distributor and retailer obligations.

Finally, Energy Queensland suggests the following for further consideration:

- That a defined escalation process is provided in the B2B Procedures.

- That a national Life Support medical certificate / registration template is created to ensure participants are covering all required details.

- That the central repository should have the ability to support other emergency and community services response teams (i.e. Police and Fire service).

Please note: The above suggestions relating to a central repository should be considered in accordance with relevant privacy obligations.

Energy Queensland would appreciate meeting with AEMO to discuss this proposed solution.

Evoenergy

Evoenergy supports Option two (2), and making the information available in the C7 and C4 reports, but excluded from NMI Discovery to remove the possibility of discrimination.

Benefits of Option two (2) include:

- All market updates can be managed via one mechanism
- Central location is updated to be one source of truth and allow for better jurisdictional and national reporting
- All relevant parties can be notified from one action ensuring correct information
- Reduced volume of market transactions as reconciliations can be done with the central repository leading to less B2B reconciliations
- B2B CDN can be refined to include all relevant customer contact information
- B2B CDN reliance on one key field no longer applicable
- Provision of a clear source of truth for life support information
- Reconciliation can be done by each participant based on system availability (not requiring the other participant)

Challenges of Option two (2) include:

- Clarity needed for what extra Life Support customer contact information can be included; i.e., multiple contacts
- Clarity needed as to what point a participant can update the central system; i.e., must be listed MDP or DNSP
- Prioritisation of the life support transactions and the need for almost real time processing
- Clarity required to ensure all participants action life support updates consistently. For example deregistration completed prior to market update submissions

AusNet

AusNet Services endorses option 1 of a B2B transaction as the most efficient option in preference to option 2 for a central repository. A B2B transaction would allow businesses to reliably and securely handle life support notifications.

We acknowledge that in principle, there is merit in implementing a central repository but only if it was accompanied by a Rule change (and changes to the Victorian obligations). A further Rule change could establish obligations for operating a central repository and alter the requirements for retailers and DNSPs from individually maintaining life support registers to maintaining a central life support register. Hypothetically then the responsibilities of the party operating it, customers may be able to benefit from a smoother of transfers life support information. However, the current rules do not support this potential efficient use of a central repository for customer life support information. Without changes to the Rules (and Victorian obligations) a central repository would:

- ***not*** displace the requirement for both retailers and DNSPs to maintain ***auditable*** and ***time-sliced*** Life Support registration details;
- ***not*** enable customers to transfer between retailers without needing to inform the new retailer, where the retailer is the registration process owner;
- ***not*** avoid the need for a DNSP to inform a new retailer of life support registration, where the DNSP is the registration process owner;
- ***not*** simplify the reconciliation process between DNSPs and retailers;

Additionally, the current Rules do not adequately assign liability to a party who provides incorrect information to the central repository. Minimum service availabilities requirements for the operation of the central repository would need to be agreed.

With or without the rule change, a central repository would not reduce the required number of life support transactions or resolve the need for writing to customers to deregister life support at a premise.

We recommend commencing work on developing a B2B transaction immediately to ensure businesses have adequate time to deliver the necessary IT changes prior to November 2019. A decision on the long term B2B option for life support information is required by June 2018 to meet this timeframe. Enough time has already been expended in seeking to explore the two options for the long term solution. Establishing another Rule change would overly delay the process of establishing reliable and secure processes in handling life support information, hence we prefer to pursue option 1.

Red/Lumo

Red and Lumo Energy consider Option 2 as our preferred option, we strongly support this as customer and industry best outcome in terms of a long term solution. We would suggest in considering the scope and extent of this solution that AEMO and the IEC consider this may require extensive time and industry participation to complete (we anticipate this may take works further into 2020 to develop and implement), as this solution would also be likely to require ;

1. B2B and/or CATS changes to facilitate the mechanisms to update/remove or modify information as a registration owner and,
2. Industry wide reconciliation and transition/cutover plan would also require Industry resources and time to plan and implement.

Simply

The two options are:

Option 1 - B2B Transaction):

This option is to have the life support notification that is required to be provided to the relevant participants be delivered by a new B2B transaction. A new schema may be required. The new transaction would be sent by the current or prospective Retailers and DNSPs.

Option 2 - Central Repository:

This option is to have life support information stored in a central repository that will allow participants to create, update, remove and discover life support information. The creation, update and removal will only be performed by the registration process owner of the life support information. Discovery can be performed by current participants who have a relationship with the customer or participants who may have a future relationship with the customer.

This option was discussed at the IEC meeting in February and was not a solution put to them by the B2BWG. AEMO will need to perform an analysis as to whether this could meet all of the requirements of the rule change and what would need to be created/modified to allow these requirements to be met.

As the EIC in their determination has required a permanent solution for this matter to be in place by end 2019, Simply Energy be has no strict preference on either of these options as both are technically viable with pros and cons. However we do believe that Option 2 will require more requirements and pre-requisites to manage due to the following reasons:

- Legacy data to be imported in a centralised database by all parties (source of truth to be determined for legacy data) – this will be a major exercise.
- Parties will need to perform three-way reconciliation as there will be data in Retailers systems, Distributor systems and also the AEMO's systems.
- The LS reference for a NMI must be discoverable

Various scenarios should be developed to test the operation of a centralised facility. Further, consideration needs to be given as to whether this facility would cater for gas customers as well as electricity customers, given that the life support obligations are agnostic of energy type.

If the decision is to continue with B2B, then the necessary changes to convert the process to a B2B AseXML transaction basis will need to commence within a short period. In addition, it should be a transactional model from end-to-end and as such:

- Include a new transaction "LifeSupportNotification Request" instead of repurposing a CDR.

Aurora

Aurora Energy long term solution preference is option 2 – central repository. However Aurora Energy would like to understand the life cycle of this option. For example if the same customer with Life support churns, who takes ownership of the process? Aurora Energy would also like to understand the timeframe for when AEMO would be implementing the 'long term solution'. This will also help we can understand how long we will be using the intrim process, as well as preparing for the Long Term solution changes.

Ausgrid

Ausgrid supports option 2, a central repository.

2(a) Allow the management of life support information within MSATS and make it universally available.

(b) Life support could be provided by the methods below to allow all Roles to be updated appropriately.

i) NMI Discovery

ii) C7 Report

iii) CR505x

iv) C4 Report

v) C1 Report

The benefits of having a central repository is that Reconciliation of information is no longer required, as all market participants are using one repository. This would also reduce the risk of NECF breaches as the life support requirements can be viewed by all parties.

Ausgrid would like this option (2) to allow Prospective retailers to flag sites from a certain date (ie their transfer target date). Currently prospective retailers contact us directly via the phone or email notifying of life support requirements. To avoid potential NECF breaches, Ausgrid applies the life support flag immediately even though the prospective retailer may not have won the site in the market and the current retailer advised. This causes confusion at times as the FRMP will sometimes submit a CDN a day or two later advising life support is not required, therefore overriding the existing life support flag. 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.

Another option could be the adding of a new B2B transaction for this purpose (should be able to leverage from existing CDR/CSDN functionality) but our preference is a central repository.

Citipower and Powercor

CitiPower and Powercor favours the central repository as the long term solution provided there are stringent controls in place, i.e. who can update info, clarity and transparency on registration process owner which would otherwise not be visible or difficult to identify if relying solely on B2B transactions. This option also provides industry with the best way of creating a single source of truth for this critical function of managing life support customers.

General Submission

Powershop

Option and commentary for long term solution

Powershop Australia Pty Ltd (**Powershop**) is supportive of a change to the B2B procedures to allow participants to use email as an interim solution for exchanging additional life support information to meet the new obligations subject to:

• the changes to the B2B procedures being minimal and not placing substantial additional obligations on participants; and

• the information exchanged using email is secured in a manner that is consistent with Australian Privacy Principles (**APPs**).

Such changes should be the minimum necessary to permit such an outcome while development of a more complete solution using the existing B2B Hub infrastructure is undertaken.

This concept of minimal change for the interim solution was articulated by Peter Van Loon to the IEC in his capacity as a discretionary member of the IEC representing small retailers and was noted by the IEC as an approach suitable for consideration in this consultation.

Although it is not stated in the consultation material, we assume this is a consultation in accordance with the B2B procedure change process set out in Rule 7.17.4 of the National Electricity Rules. We were unable to identify who has proposed this change. Rule 7.17.4(f) requires that changes to the B2B procedures must be proposed by a person other than the IEC and such a proposal when provided to the IEC must include details of the proposed changes including supporting information (i.e. reasons for the proposed change). We assume that this change was proposed by the B2B Working Group.

In addition, while the IEC may have received advice from AEMO whether any changes are required to the B2B Hub and if so any likely costs for such change, the details of that advice are not included in the consultation material as required by Rule 7.17.4(i). We are proceeding on the basis that the advice was that there will be no changes to the B2B Hub and no costs will be incurred in proceeding with an interim email solution.

We also note that the consultation material appears to be missing a report setting out an overview of the likely impact of the proposal on AEMO and B2B parties. Such a report would normally be included in a B2B procedures change pack and would be a critical element for enabling appropriate consultation on the B2B proposal. Again, we are proceeding on the basis a change pack was not considered necessary due to the minimal nature of the proposed change. Obviously if a

more substantive change imposing specific mandatory obligations on participants was being contemplated we would expect to see full compliance with all of the rule change procedures noted above.

To this extent, we remind the IEC of the importance of the B2B principles and in particular a requirement for efficient, effective and reliable communications

We also remind the IEC that any decision to modify the B2B procedures under Rule 7.17.4 should have regard to National Electricity Objectives as well as the B2B factors and the B2B principles.

Notwithstanding the above, we support the intent behind the AER proposal and subsequent AEMC rule change and recognise the importance of ensuring life support information is shared and available in an efficient, effective and reliable manner.

We are concerned that the detail of the proposed solution is inconsistent with the intention of a minimal change, interim solution and is more consistent with a full change to the procedures requiring a detailed consultation pack.

We are also concerned about the use of email, particularly for any extended period of time without due consideration to its reliability and security limitations.

Given the highly sensitive nature of the information to be exchanged, consideration of privacy implications will be required. It should be noted that the APPs place strict restrictions on the handling of sensitive information which specifically includes health information. In particular, the APP guidelines explicitly state that email is not a secure (or acceptable) form of communication.

In light of the above, it is clear that changes will need to be made to the proposal to ensure it is capable of being implemented whilst still maintaining minimal impact given its interim nature. In our view, this could be best achieved by:

1. Encouraging the use of standard form template emails through amendments to the B2B non mandatory guidelines and not within the enforceable B2B procedures. This should also include guidance on appropriate security and reliability techniques including password protection and monitoring and managing confirmations of receipt. This would need to address the use of recommended forms of encryption as required under the APP guidelines.

2. Fast tracking the development of the B2B Hub as this will enable the use of the significant investment made by industry in this secure and reliable communications platform. This could include the development of a simple translation tool to enable participants to utilise the interim email solution (and/or a simple CSV upload/download feature within the existing LVI) to access the more secure, reliable and auditable hub and enabling participants to develop their own direct hub access, systems and process in their own time frames.

Our experience with the Power of Choice changes is that concerns about the speed of change to the use of the B2B Hub, as the central means of communications, may be capable of being addressed via AEMO developing a simple translation tool (and/or modifying the existing POC translation tool) to

enable participants to utilise existing internal processes (e.g. email) while awaiting the completion of the development and testing of a full B2B tools, systems or processes.

In response to Matter under Consultation: list of procedures which the IEC is proposing to amend and develop under this consultation we see the only change necessary to the procedures is a statement that expressly allows the use of emails for the purpose of this interim solution.

We also wish to raise the following specific matters.

• The transaction set details as proposed, whether utilising the B2B Hub or email, must cater for multiple records applying to the same site or NMI. For example, multiple persons may reside at the same site with different life support equipment requirements, different contact arrangements and different medical confirmations. Given the importance of managing life support equipment, it is also highly likely that life support equipment customers will want to provide more than one set of contact details for management purposes.

• We do not believe that there is a requirement to include the form of life support in any data interchange. The Rules specifically require only that retailers and distributors advise each other of the customer's requirement for life support equipment and not the particular form of equipment.

• Any solution should provide the best means of efficiently and effectively meeting the objectives of the rule change, and in particular ensure the safety of customers is best protected. Given that following Power of Choice many participants have the ability to impact supply to customers (Metering Co-ordinators and Metering Providers for instance), any solution should support the simple sharing of life support information to such participants.

In the matter of Long Term Solution Options, clearly a central repository is not appropriate as an interim solution. However, we do not have sufficient information to determine the benefits of a central repository versus a B2B solution as a more complete solution given the consultation does not include the necessary reports and details that would normally be provided in a consultation pack. Such reports and information setting out an overview of the likely impact of any proposal on AEMO and B2B parties, alignment to the B2B principles and in particular the requirement for efficient and effective and reliable communications is required.

While there may be potential benefits associated with a central repository, the basis of those benefits and countervailing costs and impacts have not been identified. However, it would appear that the use of existing infrastructure and systems, including use of the standard B2B Hub (whether utilising a translation tool or not) and/or elements of the MSATS standing data system would enable compliance with the Rules in a cost effective and efficient manner consistent with the B2B principles.

IEC Response to Powershop General Submission

The matter under consultation for the B2B procedures which the IEC is proposing to amend and develop under this consultation is a result of the Australian Energy Market Commission (AEMC) Final Determination strengthening protections for customers requiring life support equipment. The B2BWG working on direction of the IEC, recommended the following email solution for business to business communication of Life Support information as part of the initial consultation.

The proposed B2B Procedure changes aim to improve the communications process between participants through the development of consistent and clear processes for the exchange of Life Support information to ensure the safety of customers and for participants to meet the objectives and obligations set out in the Rule change. The recommendation to include the Life Support Equipment was done to address the requirements set out clause 124B, subclause 1 (a), of the AEMC Final Rule Determination.

The B2B Procedures specify the standard process and data requirements for the communication, updates and reconciliation Life Support information. The B2B Procedures has effect only for the purposes set out in the NER and NERR. All other national and jurisdictional regulatory instruments and codes prevail over the B2B Procedures to the extent of any inconsistency. The B2B Procedures also do not preclude parties (for example, Metering Co-ordinators or Metering Providers), from bi-laterally adopting or using the B2B Life Support processes.

The most recent change to (DRAFT) B2B Procedures adopt a transaction based solution using the B2B eHuB Low Volume Interface (LVI) accessible by participants to minimise the cost to industry and address concerns raised that an email solution is not a secure (or an acceptable) form of communication. The proposed B2B changes reflects the majority industry position in response to a straw poll conducted by the IEC following the 9 May 2018 IEC meeting. Minimal changes were made to existing Customer Site Detail Notification transactions.

Despite the Notice of consultation and change marked Procedure changes, a change pack outlining likely impact of any B2B Proposal on AEMO and B2B Parties was not provided with the initial consultation. This information gap will be addressed with the release of a draft report at the second stage consultation also addressing the B2B Principles and B2B Factors.