



14 January 2020

Ms Audrey Zibelman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
Melbourne VICTORIA 3001

NEM.Retailprocedureconsultations@aemo.com.au

Dear Ms Zibelman

Ergon Energy and Energex submission to the B2B Procedures v3-4 Consultation

Ergon Energy Corporation Limited (Ergon Energy) and Energex Limited (Energex) welcome the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the B2B Procedures v3-4 Consultation.

Ergon Energy's and Energex's feedback on the proposed changes is contained in the attached response template.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact either myself on (07) 3664 4105 or Barbara Neil on (07) 4432 8464.

Yours sincerely

A handwritten signature in black ink that reads 'C. G. Martin'.

Charmain Martin
Acting Manager Policy and Regulatory Reform

Telephone: (07) 3664 4105
Email: charmain.martin@energyq.com.au

B2B Procedures

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

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:** Ergon Energy and Energex*

***Completion Date:** 14 January 2020*

Table of Contents

- 0. Example Submission (Please delete this section)..... 3
- 1. Service Order Process..... 4
- 2. One Way Notification Process..... 5
- 3. Technical Delivery Specification 6

0. Example Submission (Please delete this section)

General Instructions

1. Please keep information in the clause numbers simple - eg no titles, comments etc. – put titles and text in the comment section.
2. Please use a individual row for each comment on any each clauses.
3. Old clauses only needed if there is no equivalent clause within the revised draft procedures.
4. If an obligation exists in another instrument please identify the instrument and clause to assist in including guidance notes.
5. Please only include comments either with suggested changes, issues or support. Please do not include 'No Comment'.
6. See example below (please note the “comments” are sample only, they bear no relevance to the proposed changes):

Participant Name	Old Clause No	New Clause No	Comments
	1.42(a)	2.15(a)	Service Order response. Change response list from varchar(250) to an enumerated list.
	1.42(a)	2.15(a)	Suggest add 'Other' as part of enumerated list and add free text to support other.
		2.25(a)(ii)	Table 5 “Description of use” should be reworded to “Description of typical use”.
		3.6(a)	The MDP SLP (c 3.5.2) requires the meter serial ID to be provided. Suggest the MeterSerialID be added to the transaction.
		3.6(a)	Ensure MeterserialID is the same field used in other procedures.
		2.15	Ensure character length for MeterSerialID matches MSATS field length.

1. Service Order Process

Participant Name	Old Clause No	New Clause No	Comments
			No comments on all proposed changes.

2. One Way Notification Process

Participant Name	Old Clause No	New Clause No	Comments
			No comments on all proposed changes.

3. Technical Delivery Specification

Participant Name	Old Clause No	New Clause No	Comments
			No comments on all proposed changes.

4. Customer Site Details Notifications Specification

Participant Name	Old Clause No	New Clause No	Comments
			No comments on all proposed changes.

5. Meter Data Specification

Participant Name	Old Clause No	New Clause No	Comments
			No comments on all proposed changes.

6. B2B Procedures Issues Paper

Participant Name	Old Clause No	New Clause No	Comments
Ergon Energy and Energex		5.1.3	
Ergon Energy and Energex		5.3 – Q8	Although this will cause some problems we agree with the need for a file size increase.
Ergon Energy and Energex		5.3 – Q9	We believe this will mitigate the problems caused by 10 MB files.

Participant Name	Old Clause No	New Clause No	Comments
Ergon Energy and Energex		5.3 - Q10	We suggest that the 1,000 limit is too low as we have already seen files less than 1 MB in size with more than 1,000 transactions. However, some testing is required to determine what a suitable limit would be.
Ergon Energy and Energex		5.3 – Q13	Of the options presented, we suggest 2 December 2020 is the preferred option, so that it can be implemented together with or prior to 5MGS changes. November 2021 would be too late and would result in rework being required.