

## B2B Procedures

- Customer and Site Details (procedure changes)
- Service Order (procedure changes)
- Meter Data (version change)
- One Way Notification (version change)
- Technical Delivery Specification (procedure changes)
- B2B Guide (document changes)

## CONSULTATION – First Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant: PLUS ES***

***Completion Date: 5 Jul 2021***

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## 1. Issues Paper Questions

Topic	Question	Comments
2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)	<b>Yes</b>
2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	PLUS ES has no issues with an implementation date of 7 Nov 2022
2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)	<p><b>Other</b> – PLUS ES will not be using these fields.</p> <p>Clarification sought as <b>DP Number</b> and <b>Delivery Point</b> are 2 different fields.</p> <p>DP Number defined as:</p> <p><b>DPNumber</b> A deposited plan (DP) number corresponds to an image that defines the legal boundaries of a plot of land in NSW and ACT</p> <p>PLUS ES understood the requirement was for the Section Number and Deposit Plan (DP) Number.</p>
2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	PLUS ES has no issues with an implementation date of 7 Nov 2022

Topic	Question	Comments
2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)	<p><b>Other</b></p> <p>Whilst PLUS ES understands the proposed changes, we question the benefit realisation given participants have currently built their own system logic to overcome this issue.</p>
2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	PLUS ES has no issues with an implementation date of 7 Nov 2022
2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)	<p><b>Other</b></p> <p>Whilst PLUS ES agrees the proposed change for non-regulated MPBs, this will deliver no additional value to the industry when the procedures become effective. Non-regulated MPBs currently offering remote energisation services have already implemented coincident checking of energisation service orders they receive.</p> <p>The proposed changes cater to a ‘siloes’ participant approach, a subset of use cases, without addressing the complications of 2 separate entities potentially being requested to perform energisation services. Hence increasing the likelihood that a customer will be left off supply.</p>

Topic	Question	Comments
2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	<p>PLUS ES have already implemented the proposed obligations, cognisant of the potential industry impacts with the introduction of remote energisations.</p> <p>PLUS ES to further mitigate instances where a customer may be left off supply has expanded their solution to also include coincident checking of Notified Party Notification (NPN), when received.</p>
2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)	<p><b>Other</b></p> <p>Whilst PLUS ES agrees that actions need to be taken, we propose that this process should not be in the B2B Guide.</p> <p>Obligations should be identified and/or enhanced to achieve the objective and included in the respective AEMO procedures such as service level procedures etc.</p>
2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	PLUS ES has no issues with an implementation date of 7 Nov 2022

<p>2.10 Questions on proposed changes</p>	<p>Question 11: Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?</p>	<p>PLUS ES believes a more robust solution could be made available than the currently proposed ‘coincident checking’ obligations for non -regulated MPBs, with respect to the introduction of remote energisations.</p> <p>PLUS ES supports that <b>all</b> participants, Retailers, non-regulated MPBs and LNSPs should use and/or be able to consume Notified Party transactions.</p> <p>Where metering with enabled communications has been installed, the MPB ≠ LNSP. Hence, with respect to energisation of a site, the industry has transitioned from a 1:1 (Retailer- LNSP) relationship to a potential three participant relationship which could affect the consumer’s supply state. These stakeholders are, the Retailer (Current/Incoming), the LNSP and/or the MPB. The current Market systems and procedures do not support near real time visibility to impacted participants.</p> <p>In the absence of near real time systems, a timelier and cost-efficient mechanism to bridge the gap and mitigate the instances of a customer being left off supply is to:</p> <ul style="list-style-type: none"> <li>• mandate the NPN for de-energisation and re-energisation SO and</li> <li>• place an obligation on the LNSP and non-regulated MPB to include in their coincident checking the NPN.</li> </ul> <p>PLUS ES would support having the above proposed solution introduced for consultation as it would provide a more robust solution by ensuring:</p> <ul style="list-style-type: none"> <li>• efficient processes: the Retailer, the LNSP and the non-regulated MPB would collectively operate under the same guidelines and procedures</li> <li>• mitigation against a customer being left off supply due to different parties receiving the de-energisation and re-energisation request: i.e. providing visibility of energisation requests at the NMI irrespective of which party was requested to perform the action.</li> </ul> <p>Mandating the NPN for the above SOs would also deliver additional operational efficiency options, i.e.</p>
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Topic	Question	Comments
		<ul style="list-style-type: none"><li>• For Retailers – to comply with their obligation to notify the LNSP of a de-energisation and the reason, especially if the de-energisation SO was sent to the MPB.</li><li>• For non -regulated MPBs – this will ensure a NPN is received for all de-energisation SOs sent to the LNSP, mitigating against wasted truck visits when their meter has stopped communicating.</li></ul> <p>Contrary to popular belief this ‘visibility’ challenge and its potential consequences will not be a transitional issue but rather an ongoing challenge; specific jurisdictional requirements, retailers choosing to de-energise at the fuse are just a few contributing factors.</p>
2.10 Questions on proposed changes	Question 12: What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	PLUS ES does not see challenges in adopting operationally the proposed changes. It is the quantification/qualification of the industry benefits for some of the proposed changes which PLUS ES finds challenging.

Topic	Question	Comments
2.10 Questions on proposed changes	Question 13: What are the costs and/ or benefits if the proposed changes were not made? Consider the perspectives of process, training, system and customer impacts.	<p>PLUS ES supports the following:</p> <ul style="list-style-type: none"> <li>• Remove Unstructured site address – we support this as we believe a standardisation will deliver clarity and align with MSATS, reducing downstream resourcing impacts.</li> <li>• Add Section and DP Number – we do not believe this would deliver any benefit as these values are not widely/consistently known. Hence, if these changes are not delivered the impact would be minimal.</li> <li>• Changes to Person Name Given and Person Name Title fields: PLUS ES has current logic which already mitigate against the challenges the proposed changes are trying to mitigate. They would not deliver further enhancements, instead PLUS ES would potentially incur further costs for no realised benefit.</li> <li>• Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses: PLUS ES has already implemented the proposed obligations including additional enhancements without large resource impacts, so this change in the B2B SO procedure delivers no additional value to BAU.</li> </ul> <p>With or without implementation, the currently proposed changes do not mitigate against an increase in resources to:</p> <ul style="list-style-type: none"> <li>○ respond and resolve on going enquiries from Retailers</li> <li>○ rectifying scenarios where customers are inadvertently left off supply due to ‘visibility’.</li> </ul>

Topic	Question	Comments
2.10 Questions on proposed changes	Question 14: Do you have any other suggestions, comments or questions regarding this consultation? If you have any comments outside of the scope of this consultation, please reach out to your relevant B2B-WG representatives.	

**2. Customer Site Details Notification Process Service Order Process**

Old Clause No	New Clause No	Comments

**3. Service Order Process**

Old Clause No	New Clause No	Comments

## 4. Technical Delivery Specification

Old Clause No	New Clause No	Comments								
3.4 (e)		<p><i>Remove Unstructured Site Address - This change does not impact the postal address information, which should continue to have the option to be in the unstructured format.</i></p> <p>If the UnstructuredAddress field is to be maintained for <b>postal</b> address, this clause should be amended to remove the required SiteAddressState and SiteAddressPostcode fields. The value of including these fields as a requirement is not evident. Especially, as the UnstructuredAddress field is no longer related to the Site address and the postal address may be in a State other than the Site address.</p>								
3.4 (g)		<p><i>Remove Unstructured Site Address - This change does not impact the postal address information, which should continue to have the option to be in the unstructured format.</i></p> <p>PLUS ES proposes the ‘Requirement’ of this UnstructuredAddress1 field , in <b>Table 4 Address field definition</b>, is changed to ‘O’ and the comments reviewed to align with the objective of the field.</p> <table border="1"> <thead> <tr> <th>Field name</th> <th>Field Format</th> <th>Optional/ Mandatory or Required</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>UnstructuredAddress1</td> <td>VARCHAR(80)</td> <td>N/M</td> <td>Mandatory if a structured address is not provided.</td> </tr> </tbody> </table>	Field name	Field Format	Optional/ Mandatory or Required	Comments	UnstructuredAddress1	VARCHAR(80)	N/M	Mandatory if a structured address is not provided.
Field name	Field Format	Optional/ Mandatory or Required	Comments							
UnstructuredAddress1	VARCHAR(80)	N/M	Mandatory if a structured address is not provided.							

## 5. B2B Guide

Old Clause No	New Clause No	Comments
		Unauthorised connection process – see response to question 9.