B2B Procedures

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

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: *AGL*

Completion Date: *6 April 2022*

Table of Contents

1. Issues Paper Questions

Topic	Question	Comments
2.1 Enhanced Coincident Service Order Logic using Single Notified Party (1a) or Two Service Orders (1b)	Question 1: What is your preferred solution, Option 1a or Option 1b, and why?	AGL strongly supports the provision of using notified parties (Option 1a) to provide information to DNSPs about differing disconnection re-connection methods. AGL notes that the two SO option (1b) only caters for re-energisations. The Notified party option was proposed to allow retailers to notify DNSPs of remote disconnections and thereby minimise the likelihood of a wasted truck visit or a bypass of a site de-energised for non-payment. Therefore, the notified party option should be used by retailers for all Disconnections, thus ensuring the DNSP is notified of any changes to supply at a premise. This is particularly relevant if the DNSP attends for some other reason. AGL also notes that the complexity of handling two service orders for a similar outcome at a site is extremely complex to manage and automate and would require every existing and new retailers (ie approximately **50+** participants) to add substantially complex logic to their SO system, whereas implementing Notified Parties has a small number of DNSPs (ie 6-7) making changes to accommodate processing Notified Parties. Option 1b has the added complexity that there are multiple responses by DBs (different and the same DB) for the same SO request, making this a complex process to design business and system processes and responses around.

Topic	Question	Comments
2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders	Question 2: Have you already implemented one of the proposed options? What would be your expected incremental costs to deliver each of the proposed solutions? This should not include costs already spent.	AGL has already implemented Notified Parties within its system, so no additional costs. Building the solution for two Service Orders has been assessed as highly complex and expensive.
2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders	Question 3: These proposed solutions will not provide 100% coverage for every service order requested. Do you believe that Option 1a or Option 1b provides better protection for customers? To what extent do you believe that your chosen option better protects customers?	As stated above, AGL believes that Option 1a (Notified Parties) provides the better service as it provides notice of other disconnections, not just re-energisations.
2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders	Question 4: What is the extent of the customer impact for each of the proposed solution? How long will a customer be without supply when each proposed solution does not provide coverage (that is, how long does it take to rectify the negative impact to the customer)?	The extent of the customer impact would be the same. Since the de-en has already occurred, the distributor will have to revisit the site to perform a re-en. However, there is no guarantee that they will do this instantly. They might need to do it later in the day/evening AH or even the next day (depending on the location). If this is the case, the Retailer would have an issued a same day re-en regardless. Unless the network guarantees instant/quicker re-en responses, where they already have a re-en service order, the two SO solution will have the same impact to the customer.

Topic	Question	Comments
2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders	Question 5: Assuming that Option 1a or Option 1b is to be implemented by May 2023, do you see any substantial or significant issues which would delay this implementation? If so, what are they?	Option 1a (Notified Party) – no implementation issues Option 1b (Two SO) – substantially more complex and relies on network consistency to properly work, otherwise each transaction with have substantial manual handling overhead.
2.3 Shared Fuse Notification using One Way Notification (OWN)	Question 6: Do you support the proposed changes with regards to Shared Fuse Notification using the aseXML OWN? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	AGL supports the proposed changes to providing Shared fuse information from Retailers/MCs to DNSPs via an aseXML OWN. AGL notes that with increased cyber-security issues and hacking risks it is prudent to move industry transactions away from e-mail-based solutions and onto Market-Net. AGL believes that this is in line with new Commonwealth cyber security legislation. AGL Notes that the proposed format in the B2B Guide may not reflect what is currently in use by existing MCs and suggest that the guide be updated to allow the existing formats to be used before the aseXML format goes live.
2.3 Shared Fuse Notification using One Way Notification (OWN)	Question 7: If the changes proposed were to be adopted, would your organisation have any issues in implementing the changes by May 2023?	AGL would not expect to have any issues implementing the OWN solution.

Topic	Question	Comments
2.9 Questions on proposed changes	Question 8: 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.	AGL also notes the various consultations occurring in industry requiring some form of notification between participants. This may be a suitable opportunity to modify the format of the Shared Fuse transaction to make it more flexible and allow for further industry requirements without schema changes. This can be easily done by 1. Changing the title of the OWN to make it generic – ie NMI Notification 2. Modify text around date 3. Modifying the 4th field name to become NMI Notification and extending the field size to say 20 enumerated characters 4. Modifying the enumerations and keeping them out of the Schema Shared Fuse enumerations might become SFY, SFI, SFN

2. Service Order Process – Option 1a (NP)

Old Clause No	New Clause No	Comments
2.3.1(a)		The procedure (1b) references type 5/6 meters; The 1a procedure references BASIC, MRIM or VICAMI. Suggest a consistent approach to exclusions be used.
2.16.4(a)		The exclusion in this clause is only Victoria, and not non-remote meters. The clause also needs to exclude types 5 & 6 meters / Basic, MRIM, otherwise the obligation is raise a Notified Party transaction for a non-remote meter.
2.16.4(c)		De-energisation should be replaced with re-energisation, given the statements following it.

3. Service Order Process – Option 1b (2 SO)

Old Clause No	New Clause No	Comments
2.3(a)		Grammar – second sentence missing 'at': ….. aim is to notify related parties **at** the connection point Missing 'them' : ….to provide **them** visibility
2.3(a)		Numbering – last clause after clause 2.3(n) also numbered '(a)'
2.16.2(b)		The exclusion in this clause is only Victoria, and not non-remote meters. The clause also needs to exclude types 5 & 6 meters / Basic, MRIM, otherwise the obligation is to send the MPB an SO for a type 5/6 meters outside Victoria.
2.16.2(b)		Statement requires more clarity . '…DNSP and the MPB, where they are unclear which party will be required to undertake the re-energisation or may have been issued an SO by the previous retailer to undertake a de-energisation ~~where they are unclear which party performed or is in the process of performing the re-energisation~~ for a small……'
2.16.(d)(ii)		This procedure (1b) references type 5/6 meters; The 1a procedure references BASIC, MRIM or VICAMI. Suggest a consistent approach to exclusions be used.

4. One Way Notification

Old Clause No	New Clause No	Comments
		See comments about genericising the Shared Fuse Transaction.
		It is noted that the proposed CSV version in the Guide has an additional column for notes which the aseXML does not have this column. Should it be added, especially in light of the proposal to genericise the transaction ?

5. Technical Delivery Specification

Old Clause No	New Clause No	Comments
		See comments about genericising the Shared Fuse Transaction.

6. B2B Guide – Option 1a (NP)

Old Clause No	New Clause No	Comments
General		Need to consistently capitalise Re-Energisation / De-energisation within document
4.3.2 (c)		Improve wording (c) A Prospective Retailer raising a Re-energisation Service Order to the first Service Provider must ensure that a Notified Party transaction is sent to the second Service Provider . This is so the service provider who may have received a De-energisation Service Order from the FRMP can use the Notified Party Transaction in their
4.3.2(d)		Improve wording (d) Because of timing issues, this process does not guarantee that the prospective retailers Notified Party transaction will cancel a ~~pending~~ De-energisation Service Order (especially if the De-energisation request has been sent to the DNSP). Despite best efforts by service providers, Prospective Retailer's customer may still find their site De-energised.
6.7		Delete as this is covered again in 7.3.6

7. B2B Guide – Option 1b (2SO)

Old Clause No	New Clause No	Comments
2(f)		This new paragraph is a holdover from the Option 1a drafting and is not relevant for two Service Orders.
4.3.2		This new section is a holdover from the Option 1a drafting and is not relevant for two Service Orders.
4.4(g)		This can be left.
6.1.4(b)		This can be left.
6.1.4(d)		This can be left. the (iii) should be moved to the start of '.. If the initiator…'
6.7		Delete as this is covered again in 7.3.6

Proposed amendment to Shared Fuse OWN

4.2.6 ~~SharedFuseNotification Data~~NMI Notification

a) This notification is to allow the Initiator to provide information relating to a NMI to the Recipient.

b) ~~The Shared Fuse notification is to allow the Initator to provide Shared Fuse information related to a connection point to the Recipient. Typically the Initator will be the Metering Provider but may also be the Retailer, and the Recipient is typically the DNSP. The key information provided will include the date that the shared fuse arrangement was determined and a value indicating the shared fuse status for the connection point (identified by the NMI).~~

~~Refer to the Metrology Procedure: Part A for a detailed description of the use of this flag.~~

Key

M= Mandatory (must be provided in all situations).
R = Required (must be provided if this information is available or has changed).
O = Optional (may be provided and should be used if provided).
N = Not required (not required and may be ignored if provided).

Table 1 ~~SharedFuseNotification~~ NMI Information field values

Field	Format		Definition
NMI	CHAR(10)	M	NMI where the shared fuse state has been determined or changed.
NMIChecksum	CHAR(1)	O	NMI Checksum for the NMI.
Date	DATE	M	The date that the Information ~~is Shared Fuse state~~ was identified by the Initiator.
~~*SharedIsolationPointFlag*~~ *NMIInformation*	CHAR(1)	M	• SFY (SFY = Shared Fuse. Use to communicate to a recipient that the NMI cannot be isolated without interrupting supply to other NMI's) • SFI (SFI = Shared Fuse but can be isolated independently. Use to communicate to a recipient that the NMI is part of a shared fuse but can be isolated without interrupting supply to other NMI's) • SFN (SFN = Not Shared Fuse. Use to communicate to a recipient that the NMI is no part of a shared fuse arrangement)