

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: Origin Energy (public version)

Completion Date: 11th April 2022

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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):

| 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. Issues Paper Questions

| Topic | Question | Comments |
|---|---|--|
| 2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders | Question 1: What is your preferred solution, Option 1a or Option 1b, and why? | <p>Origin's preferred solution is Option 1a (Notified-Party based validation for coincident re-energisation/re-energisation Service Orders) and we do not support Option 1b from proceeding to the next stage due to the reasons provided in the following sections.</p> <p>Reason: Notified Party solution was implemented during Power of Choice (POC), and the cost of implementation was in the range of <i><omitted due to confidentiality></i> overall. There has been an exorbitant cost involved in implementing Notified Party transaction in the schema, during POC go-live, including training costs. Also, AEMO invested in its Low Volume Interface (LVI) solution to accommodate this transaction for retailers who were unable to deploy the schema upgrade at that time. As a result, retailers have incurred the cost of its implementation via participant fees and upfront implementation cost, with no benefits realised until now. Option 1a is the only mechanism that can add benefit to retailers and offset some of the industry-wide implementation cost that has already occurred.</p> <p>Currently, Origin Energy uses Notified Party in service orders where its applicable, however we understand that majority of the networks do not take any action because it's not mandatory. This causes significant issues in the benefits realisation of this investment that was made in 2017. Please note that on Monday 8 May 2017, when IEC made the decision to not mandate Notified Party transaction in the Procedures, IEC agreed to revisit the requirement if there's evidence to show that the non-binding arrangements are resulting in inefficient outcomes for the market and end-consumers:</p> |

| | | |
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| | | <p>5. B2B Procedures – IEC recommendation to amend the B2B procedures</p> <p>The Committee approved the final B2B procedures amendments and agreed to make an IEC recommendation to AEMO to amend the B2B procedures, subject to the following changes:</p> <ul style="list-style-type: none"> Notified parties: A key issue raised during the B2B procedure consultation is whether to place mandatory obligations on retailers to notify parties for all service order requests. The IEC noted that having a level of awareness of what other parties are doing in the supply chain may help minimise issues and efficient delivery of customer outcomes. The IEC also noted that there are avenues (i.e. through MSATS) to receive information to minimise inefficient visits to customer sites; and the decision to build the functionality into the system is a commercial one (based on retailer review of the workings of internal process and customer feedback). <p><i>IEC resolution:</i> the IEC resolved to make the obligation to notify parties for service orders a non-binding obligation. The IEC noted the e-hub will have this functionality and a number of distributors and retailers are building this functionality into their systems and processes. The IEC agreed to revisit the requirement, after 1 December 2017, if there is evidence to show that the non-binding arrangements are resulting in inefficient outcomes for the market and end-consumers.</p> <p>Option 1b:</p> <p>On the other hand, Option 1b would take us backwards and dissolve the ‘already-invested’ efforts back to zero. As such, Option 1b has neither been considered nor deployed in any of our workflows. It appears to be a manual workaround in absence of any foolproof industry-wide solution. Origin believes that option 1b does not require any industry consultation and while Origin strongly oppose option 1b as an industry-wide approach, it is up to the retailers to initiate the ‘two re-energisation service order model’ anytime they want (even today) – there are no restrictions in B2B Procedures that prevents this option to be used. Having said that, due to the redundant/fake transactions floating in the market with Option 1b, it does not align with NERO/NEO objectives and Origin strongly advocates for this option to be taken off the options list from the next draft report.</p> |
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| Topic | Question | Comments |
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| | | <p>Two service orders per re-energisation is not being considered by Origin Energy for a number of reasons:</p> <ul style="list-style-type: none"> - Currently about 25% of NECF sites have smart meters however as smart meters are being installed at an exponential rate, this option will become troublesome for all parties, including DBs and MPs to manage 'fake/redundant' transactions floating throughout the NEM, hence data integrity will be compromised. - Significant impact on AER and internal reporting requirements, as every party must change their reporting logic to identify the 'true' re-energisation/de-energisation source, not to forget the additional time required to run the queries with double the data, growing exponentially with increase in smart meters roll-out. - Origin Energy will be required to manage a 'Not Complete' for one or both of these. Transaction & exception volume will be impacted because every COMMS meter will have two re-energisations in almost every move-in situation. - Unnecessary complexities on Ancillary charges reconciliation processes at the Retailer's end. - Not manageable during 'contingency' process mode, where each service order is sent via an email. - Significant change to Origin Energy's existing re-energisation/de-energisation automated workflows, including customer self-serve (web-based) move-in/move-outs. <p>In summary, Option 1b is not a sustainable solution, especially with the incremental increase in Smart Meter deployment, and sending two separate re-energisations to each party (DB and contestable MP) makes it a non-viable approach. It would reflect the lack of non-cooperation by key industry bodies to work on an efficient solution.</p> |

| 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. | <p>Option 1a</p> <p>Origin Energy implemented new schema that consists of 'Notified Party' based changes, as a part of Power of Choice December 2017 go-live. Since then, Origin has been using it for a number of Service Orders (including 'Large' customer transactions), however considering it's an optional functionality, Origin Energy might require minor config changes to automate the notified party fields for every re-energisation/de-energisation service order. Since it already exists in a number of other processes, including (not limited to), the Meter Exchange Service Orders where a contestable MP and Distributor coordination is required for a meter exchange/upgrade, the incremental cost to map <i>NotifiedPartyID</i> field to re-energisation/de-energisation service orders is negligible.</p> <p>On the other hand, implementing Option 1b would be an extremely expensive solution, in the upwards range of <i><omitted due to confidentiality></i> + minimum 10% ongoing cost per annum, as we'll be required to change our automated workflows across all of platforms, change our web-based functionality, provide complex training, and update process documentation to manage tens of thousands of exceptions due to the 'fake' transactions supported under this option. Assuming the number of smart meters would increase 5-10% year-on-year, the number of 'double re-energisations' under Option 1b would also exponentially increase and so would be our exception rate (because at least one of these re-energisations will return a 'Not Complete' response). Hence implementing Option 1b would be a lot more expensive from OPEX cost perspective, and not just a once-off implementation cost.</p> |

| Topic | Question | Comments |
|--|---|--|
| <p>2.1 Enhanced Coincident Service Order Logic using Single Notified Party or Two Service Orders</p> | <p>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?</p> | <p>Origin Energy understands that these options should be evaluated from a ‘preventative’ measure perspective and not to be mixed with the ‘corrective’ measure, as corrections can/are performed on a case-by-case basis.</p> <p>From a preventative measure perspective, Origin Energy doesn’t believe there’s any difference in these two options. Moreover, since physical de-energisations require a minimum of 3 days cut-off (DB specific), the likelihood of its withdrawal is quite high as it stays in-flight for a number of days before execution.</p> <p>Additionally, we believe that by extending the current coincident validations to include ‘Notified Party’, it will provide better coverage as opposed to service orders alone.</p> |

| Topic | Question | Comments |
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| 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)? | <p>Origin Energy's view is that the extent of impact would be identical from customer's perspective, if a de-energisation has already occurred, as this would mean that neither of these options were able to 'prevent' a de-energisation from occurring and hence the reversal of de-energisation needs to be performed.</p> <p>Origin notes that this issue occurs in the current world too, and there is no clear evidence that despite a re-energisation service order sitting with the DB, it is performed instantaneously, as it requires another revisit to the property that may occur later in the day. One of the examples is re-energisation after DNP, where a service order is issued to re-energise after DNP (for the same day), however the re-energisation doesn't occur instantaneously, it is usually performed as an after-hours activity. Hence unless DBs can provide assurance and agree to include the re-energisation execution timeframes in the B2B Procedures it would remain a subjective evaluation whether one option is better than the other in terms of reversing the de-energisation. For Option 1a, by the time DB's field crew is prepared to revisit and execute the job, Origin would've (hypothetically) already sent a new re-energisation, and hence the impact to customer in both instances is exactly the same. This question serves no value in measuring effectiveness of a preventative solution.</p> |
| 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? | <p>This issue has been discussed for more than 18 months and Origin Energy has previously shared a number of examples with AEMO where lack of coordination between parties has resulted in customers being left off-supply. Hence Origin Energy recommends an 'as early as possible' approach to be considered by the IEC – May 2023 should be an absolute latest for Option 1a to be implemented.</p> |

| Topic | Question | Comments |
|---|---|----------|
| 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”) | Yes |
| 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? | No |

| 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. | <p><i><Content omitted due to confidentiality></i></p> <p>Principally, Option 1b is not a sustainable option and DBs need to play a role in an efficient solution – a trilateral solution is essential where three parties (retailers, DBs and contestable MPs) are involved for a single site. Also, since Option 1b would require change across 40+ retailers, as opposed to Option 1a which is only required to be implemented by NECF DBs (VIC is out of scope) and contestable MPs (most of them have already implemented this option as per our understanding), Option 1a is an optimal solution to proceed.</p> |

2. Service Order Process – Option 1a

| Old Clause No | New Clause No | Comments |
|---------------|---------------|---|
| N/A | 2.16.4 (b) | As per technical delivery specifications clause 8.1 (d), since “The notifications sent by the e-Hub will only be applicable for ServiceOrderRequests with the ActionType of ‘New’. Cancellations (ActionType = ‘Cancel’) will not trigger notifications.”, it is worth adding a general clause that the ServiceOrderRequests mentioned in these clauses are applicable to ‘New’ ServiceOrderRequests. |
| 2.17 | 2.17 | |
| 2.18 (b) | 2.18 (b) | |

3. Service Order Process – Option 1b

| Old Clause No | New Clause No | Comments |
|---------------|---------------|--|
| | | No comments, however in general, Origin does not support Option 1b |
| | | |

4. One Way Notification

| Old Clause No | New Clause No | Comments |
|---------------|---------------|--|
| N/A | 2.12 (e) | <p>The new clause says “<i>SharedFuse – The Initiator may use this transaction to inform a Recipient of any new or any changes to existing Shared Fuse arrangements for a Connection Point.</i>” However, Origin believes that the highlighted part of the clause can create unnecessary exceptions if there are no controls to manage the correct values (manual error, etc). For e.g., the NMI should not be set to ‘Y’ when it was originally ‘N’ or ‘I’.</p> <p>Also, we believe there should there be a limit to send one OWN per NMI per day for the SharedFuse transaction.</p> |
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5. Technical Delivery Specification

| Old Clause No | New Clause No | Comments |
|---------------|---------------|-------------|
| | | No comments |
| | | |

6. B2B Guide – Option 1a

| Old Clause No | New Clause No | Comments |
|---------------|---------------|-------------|
| | | No comments |
| | | |

7. B2B Guide – Option 1b

| Old Clause No | New Clause No | Comments |
|---------------|---------------|--|
| | | No comments, however in general, Origin does not support Option 1b |
| | | |