

B2B Procedures

- RoLR Procedures Part B

CONSULTATION – Draft Report

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo Energy

Completion Date: 10 July 2023

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<p>102.3 Suspended Retailer/Insolvency Official Obligations</p>		<p>Noting that the original purpose of Table 102 is to allow a RoLR to reconcile B2B Data held by both the failed retailer and the LNSP, Red Energy and Lumo Energy (Red and Lumo) question the inclusion of data in Table 102 which is not used elsewhere in B2B Procedures.</p> <p>We also question the requirement for a failed retailer to extract and transform data which is not otherwise used in B2B communications at a point in time when they are already in turmoil and facing challenges to manage their business.</p> <p>The existing Table 102 lists the B2B Procedure which is the source of each field, ensuring all data is a familiar format and content and may be easily extracted from their systems.</p> <p>Red and Lumo recognise the potential customer experience benefits of the RoLR obtaining <i>Business_ABN</i>, <i>HardshipIndicator</i>, <i>BillingPreference</i>, <i>BillingFrequency</i> & <i>LifeSupportStatus</i>.</p> <p>We recommend an additional field which describes the life support <i>RegistrationOwner</i> for clarity of who holds, or needs to obtain, <i>MedicalConfirmation</i> with the customer.</p> <p>Proposed fields <i>Solar</i> and <i>CustomerClassificationCode</i> duplicate MSATS Standing Data or in the case of <i>AverageDailyLoad</i>, duplicate data already provided to the RoLR by AEMO in <i>ROLR_013 NMI List for RoLR\FRMP</i>.</p>	
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Section	Description	Participant	Comments
		<p>While it may be easier for the RoLR to receive this data, we are creating greater obligations on a failed retailer or their administrators to supply data which is readily accessible elsewhere and will require additional effort for the failed retailer to supply.</p> <p>It is also arguable that the inclusion of <i>Battery</i> in Table 102 is commercially sensitive to the customer as well as constituting data which unreasonably discriminates between B2B Parties by providing it to the RoLR when this information is not visible in MSATS and not required for the RoLR to manage a <i>deemed arrangement</i> and offer a standard retail contract.</p> <p>This additional data also appears to be the cause for Table 102-B since without these fields the critical difference between the proposed Table 102A and 102B is a short list of fields which could be listed 'R' <i>Required if held</i> instead of 'M' <i>Mandatory</i>.</p>	
102.3 Suspended Retailer/Insolvency Official Obligations	<i>CustomerClassificationCode</i>	<p>This is duplication of data readily available in MSATS and the failed retailer should not be required to provide it in the Customer and Site Details to Provide to RoLR.</p> <p>The purpose of Table 102 should be to provide B2B Data not otherwise obtainable i.e. data not in MSATS.</p> <p>As the ROLR has a deemed contract with the customer and is expected to offer a standard retail contract, the ROLR should expect to obtain\review the customer's Standing Data in order to provide this contract.</p>	

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102.3 Suspended Retailer/Insolvency Official Obligations	<i>Average Daily Load</i>	<p>This data is already provided to the RoLR in <i>ROLR_013 NMI List for RoLR\FRMP</i>:</p> <p>“NMI list by MSATS Participant of all NMIs where the Failed Retailer is the Current FRMP. This list will also include ADLs for each NMI”</p>	
102.3 Suspended Retailer/Insolvency Official Obligations	<i>Solar</i>	<p>This is duplication of data readily obtainable from MSATS and the failed retailer should not be required to provide it in the Customer and Site Details to Provide to RoLR.</p> <p>The purpose of Table 102 should be to provide B2B Data not otherwise obtainable i.e. data not in MSATS.</p> <p>As the ROLR has a deemed contract with the customer and is expected to offer a standard retail contract, the ROLR should expect to obtain\review the customer’s Standing Data in order to provide this contract.</p>	

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102.3 Suspended Retailer/Insolvency Official Obligations	<i>Battery/EV</i>	<p>Battery/EV is not required to be able to offer a standard retail contract, nor is this otherwise considered a B2B field. Additionally, a Mandatory field with an Unknown response is effectively a Required (if known) field, making this an illogical suggestion. If it is included, then the field should be Required not Mandatory.</p> <p>It is also arguable that the inclusion of <i>Battery</i> in Table 102 is commercially sensitive to the customer as well as constituting data which unreasonably discriminates between B2B Parties by providing it to the RoLR when this information is not visible in MSATS and not required for the RoLR to manage a deemed arrangement and offer a standard retail contract.</p>	
102.3 Suspended Retailer/Insolvency Official Obligations	<i>ConcessionCardNumber</i>	This appears to be a timely update to match the current terminology renaming the field from PensionHealthCardNumber.	
102.3 Suspended Retailer/Insolvency Official Obligations	<i>LifeSupportStatus</i>	The SensitiveLoad field already carries indication of the customer’s requirement for LifeSupport protections, if this field is to be effective it requires an indication of the RegistrationOwner to prevent the RoLR from incorrectly asking the customer for medical confirmation which has already been provided to the LNSP.	

Section	Description	Participant	Comments
102.3 Suspended Retailer/Insolvency Official Obligations	<i>RegistrationOwner</i>	This additional field should also be added to Table 102 requiring both the failed retailer and the LNSP to indicate who the RegistrationOwner is to prevent the RoLR from incorrectly asking the customer for medical confirmation which has already been provided to the LNSP.	
102.3 Suspended Retailer/Insolvency Official Obligations	Field Format of proposed fields	<p>Are the string lengths appropriate to the proposed values? Those listed below appear to be ten times longer than required?</p> <p>Average Daily Load VARCHAR (200) Business_ABN VARCHAR (200) BillingPreference VARCHAR (100) BillingFrequency VARCHAR (100)</p>	

<p>102.4 LNSP Obligations</p>	<p>Update of 'Table 102 B: LNSP's Customer and Site Details to Provide to RoLR'</p>	<p>The critical difference between the proposed Table 102A and 102B is a short list of fields which should be listed 'R' <i>Required if held</i> instead of 'M' <i>Mandatory</i>.</p> <p>- three which should be listed 'R' <i>Required if held</i> instead of 'M' <i>Mandatory</i> so that the LNSP is not expected to populate them:</p> <ul style="list-style-type: none"> ● HardshipIndicator - not held by LNSP ● BillingPreference - not held by LNSP ● BillingFrequency - not held by LNSP <p>- and a further three fields which should not be considered in Table 102;</p> <ul style="list-style-type: none"> ● CustomerClassification - available in MSATS Standing Data ● Solar - identifiable from MSATS Standing Data ● Battery/EV - a standard retail contract can be prepared without this data and it would not normally be available to a retailer without the customer's direct consent. <p>Consequently, we do not consider a new Table 102B to be required for this procedure.</p> <p>Having said this, the LNSP is arguably better positioned to communicate the presence of Solar or a Battery as they have access to the DER register, so why would these fields be present in 102A but not 102B?</p> <p>In short, if the fields duplicating MSATS data were omitted and BillingPreference, BillingFrequency and HardshipIndicator marked 'R' then the LNSP would not be expected to provide them, however the failed retailer would still be Required to - they're not optional.</p>	
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104.4 LNSP Obligations	Editing of section (b), (e) an (g)	Red and Lumo support these changes which enable communication of B2B Data between participants in the wake of a RoLR event.	
104.5 RoLR Obligations	Addition of clause 104.4 (g) in section (b)	Red and Lumo support these changes which enable communication of B2B Data between participants in the wake of a RoLR event.	