

B2B Procedures

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

CONSULTATION – First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet Services

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1. Customer and Site Details

Participant Name	Old Clause No	New Clause No	Comments
AusNet Services		2.1 (b)	AusNet Services recommends changing the transaction name from “life support confirmation” to “life support acceptance”. This is in line with the standard accept/reject transaction model associated with other B2B transactions. It also is in line with the generic request and notification process diagram in figure 2.
AusNet Services		Figure 4	<p>The 5 day timeframe to provide a notification from a life support request is longer than the 2 day timeframe for responding to a CDR. The reason for 2 days is not clear, but may align with the 5 day timeframe is the timeframe for the very different life support reconciliation process. However, the reason for the 5 day timeframe in the case of the reconciliation process is to allow adequate time for bulk processing of transactions. Since the transaction outlined in Figure 4 is not a bulk transaction the 5 day timeframe is too long.</p> <p>A more prompt response is required, given the high importance of life support information and the potential for conflicts on life support status between participants.</p>

Participant Name	Old Clause No	New Clause No	Comments
AusNet Services		4.3.1 (e)	<p>Guidance Note 2 requirements for the DNSP to update records on receipt of SensitiveLoad value of “None” does not give regard to the minimum 15 business days required to undertake a de-registration process, or consider the situation where the DNSP is the registered process owner of life support. We recommend the following changes to 4.3.1(e).</p> <p><i>[Guidance Note 2] Where the requirements for Life Support are no longer appropriate (for example an occupier no longer meets the jurisdictional requirements to be classified as a Life Support customer) a Retailer must:</i></p> <ul style="list-style-type: none">- <i>notify the DNSP by way of sending a life support notification; and</i>- <i>send a CustomerDetailsNotification containing NMI, LastModifiedDateTime, a MovementType value of “Update” and SensitiveLoad value of “None” to the relevant DNSP and the DNSP must update their records accordingly.</i>
AusNet Services	4.3.1 (e)		<p>Whilst DNSPs are relying on email B2B notifications, removing the need for a phone call in establishing life support registration would reduce protections for life support customers. Email life support transactions could be delayed by IT security arrangements or sent to the wrong email address.</p> <p>Until a non-email B2B transaction solution is established, a phone call should still apply for new life support registrations.</p>

Participant Name	Old Clause No	New Clause No	Comments
AusNet Services		4.4.1 (c)	<p>AusNet Services considers clause 4.4.1(c) does not adequately describe the date as to when a prospective life support notification is required, and recommends:</p> <p><i>The changes become effective from the earliest date notified:</i></p> <ul style="list-style-type: none">- in the “daterequired” field in the “life support notification” transaction;or- the date of receipt of a CDN transaction indicating the need for life support registration.
AusNet Services		4.4.1 (e)	<p>AusNet Services considers clause 4.4.1(e)(iii) misrepresents the NERR requirements. Under no circumstances should deregistration of life support customer be prospective. The drafting of the procedures encourages non-conformance to the Rules. We recommend:</p> <p><i>4.4.1(e)(iii) the changes made by the recipient are effective from the date the email is received</i></p> <p>In preference to:</p> <p><i>4.4.1(e)(iii) the changes are effective from the date specified in the email notification.</i></p>

Participant Name	Old Clause No	New Clause No	Comments
AusNet Services		Table 5	<p>AusNet Services has identified that life support status field values in the initial procedures are a combination of statuses and reasons. We recommend the “life support status”; “medical confirmation” and the “reason” should be separate fields.</p> <p>The “life support status” values should be:</p> <ul style="list-style-type: none"> • Registered with Life Support • None <p>The “medical confirmation” values should be:</p> <ul style="list-style-type: none"> • No medical confirmation provided • Medical confirmation provided <p>The “reason” values should be:</p> <ul style="list-style-type: none"> • Registered – customer notified • Registered – DNSP registration process owner notified • Deregistered – No Medical Confirmation • Deregistered – No customer confirmed • Deregistered – Customer notified <p>The reason values in red font are new recommended reason fields that distinguish between a registrations associated with customers notifying retailers and the situation where the DNSP is the registration process owner notifying a new retailer.</p>
AusNet Services		Table 5	<p>The DateRequired field is currently presented as Required and hence only needs to be provided when it is available. The DateRequired should always be available. Therefore we recommend changing it to mandatory in a B2B transaction or B2B email.</p>

Participant Name	Old Clause No	New Clause No	Comments
AusNet Services		4.4.2(b)	<p>AusNet Services considers that life support notifications may be legitimately rejected for a number of reasons, where the information provided is inaccurate and does not identify a premise (e.g. NMI maybe on another DNSPs network). We suggest the following wording:</p> <p><i>Life support confirmation/rejection is to be sent within 1 business day.</i></p>
AusNet Services		4.4.3(a)	<p>AusNet Services considers that including the reason for rejecting a life support notification in the email subject line puts important information at risk of not being read by the recipient. The email subject could be truncated information. For such important information relating to the reason for rejecting a life support notification, we recommend the reason be included in a field within the email.</p> <p>The email for confirmation/rejection email notifications and the message contained with the email should be subject to a defined structure. Only with structured message content can businesses automate and reduce manual work.</p>
AusNet Services		4.4.4 (c)	<p>As indicated above in our comment for Figure 4, the 5 day timeframe to provide a notification from a life support request is longer than the 2 day timeframe for responding to a CDR. The 5 day timeframe is the timeframe for the very different life support reconciliation process. The reason for the 5 day timeframe in the case of the reconciliation process is to allow adequate time for bulk processing of transactions. Since the transaction outlined in 4.4.4(c) is not a bulk transaction the 5 day timeframe is too long.</p> <p>A more prompt response is required, given the high importance of life support information and the potential for conflicts on life support status between participants.</p>

2. Option and commentary for long term solution

AusNet Services endorses option 1 of a B2B transaction as the most efficient option in preference to option 2 for a central repository. A B2B transaction would allow businesses to reliably and securely handle life support notifications.

We acknowledge that in principle, there is merit in implementing a central repository but only if it was accompanied by a Rule change (and changes to the Victorian obligations). A further Rule change could establish obligations for operating a central repository and alter the requirements for retailers and DNSPs from individually maintaining life support registers to maintaining a central life support register. Hypothetically then the responsibilities of the party operating it, customers may be able to benefit from a smoother of transfers life support information. However, the current rules do not support this potential efficient use of a central repository for customer life support information. Without changes to the Rules (and Victorian obligations) a central repository would:

- **not** displace the requirement for both retailers and DNSPs to maintain **auditable** and **time-sliced** Life Support registration details;
- **not** enable customers to transfer between retailers without needing to inform the new retailer, where the retailer is the registration process owner;
- **not** avoid the need for a DNSP to inform a new retailer of life support registration, where the DNSP is the registration process owner;
- **not** simplify the reconciliation process between DNSPs and retailers;

Additionally, the current Rules do not adequately assign liability to a party who provides incorrect information to the central repository. Minimum service availabilities requirements for the operation of the central repository would need to be agreed.

With or without the rule change, a central repository would not reduce the required number of life support transactions or resolve the need for writing to customers to deregister life support at a premise.

We recommend commencing work on developing a B2B transaction immediately to ensure businesses have adequate time to deliver the necessary IT changes prior to November 2019. A decision on the long term B2B option for life support information is required by June 2018 to meet this timeframe. Enough time has already been expended in seeking to explore the two options for the long term solution. Establishing another Rule change would overly delay the process of establishing reliable and secure processes in handling life support information, hence we prefer to pursue option 1.