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B2B Procedures

Draft Report Change Pack

Prepared by: Information Exchange Committee

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1. Notice of Consultation

1.1 B2B Procedure changes

Date of Notice: 12 February 2020

Date Response Due: 11 March 2020

This Notice informs all B2B Parties, relevant B2B Change Parties, AEMO and such other persons who identify themselves to the Information Exchange Committee as interested in the B2B Procedures (**Consulted Persons**) that AEMO is conducting a consultation on B2B Procedures on behalf of the Information Exchange Committee (IEC).

This consultation is being conducted under clause 7.17.4 of the National Electricity Rules (**NER**), in accordance with the Rules consultation requirements detailed in rule 8.9 of the NER.

1.2 Matters under consultation

The proposed changes are to:

- Amend the Service Order Process to:
 - Introduce seven new optional fields to support better communication between Initiators and Recipients of transactions. Currently this information is being communicated using special instructions in the service order (SO).
 - Add a new enumeration to the CustomerType field so that an Allocate NMI request for a non-contestable unmetered load (NCONUML) can be communicated.
 - Clarify that the Supply Abolishment SO can be used in New South Wales.
- Amend the One Way Notification Process to introduce a new optional field to the Meter Exchange Notification (MXN) and the Meter Fault and Issue Notification (MFIN) transaction to link this transaction with the initiating SO.
- Increase the maximum file size and introduce a transaction number limit for the Meter Data (MTRD) transaction group.

| Instrument | New / Amended |
|------------------------------------|--------------------------------|
| Customer Site Details Notification | Amended (Version control only) |
| Service Order | Amended (Procedure changes) |
| Meter Data Process | Amended (Procedure changes) |
| One Way Notification | Amended (Procedure changes) |
| Technical Delivery Specification | Amended (Procedure changes) |

1.3 Changes between issues paper and draft report

The effective date of these changes is now 10 November 2021 as a majority of participants indicated a preferred implementation date during November 2021. As the effective date of these changes has been pushed back, respondents have been given additional time to respond to the draft report.

Significant changes were made to the Service Order Process, as suggested by a majority of respondents. Jurisdictional differences have been detailed in the Supply Abolishment transaction description and requirements. Section 4 of the Service Order Process has been updated following

participant feedback. Most notably, the proposed “Agreement Only” option in the key has been replaced by a “Optional/Not required” option in order to make the bilaterally-agreed nature of the fields clearer. The B2B Guide will be updated to complement this consultation and encourage participants to use “SpecialNotes” when selecting “Other” in an enumerated list.

Provision for NCONUML has been made in the Meter Data Process 2.4.3(a)(iii) following feedback from Origin Energy.

A majority of participants supported the removal of the MXN transaction. The One Way Notification Process and Technical Delivery Specification were updated to reflect the removal of the MXN transaction.

As per feedback from stakeholders and AEMO, NCONUML is defined as a non-contestable unmetered load and a megabyte is defined as 1024 kilobytes in Clause 1.6 of the Technical Delivery Specification.

Supporting editorial changes were made to each technical document. These are detailed in the change marked versions available on AEMO’s website and include updating references and fixing typographical errors.

1.4 The consultation process

The consultation process is outlined below. Dates are indicative only and subject to change.

| Process Stage | Indicative Date |
|--|------------------------|
| Publication of Draft Report and Determination | 12 February 2020 |
| Closing date for submissions in response to the Draft Report | 11 March 2020 |
| Publication of Final Report and Determination | 22 April 2020 |

1.5 Invitation to make submissions

The IEC invites written submissions on the matter under consultation, including any alternative or additional proposals you consider may better meet the objectives of this consultation and the national electricity objective described in section 7 of the National Electricity Law.

Please identify any parts of your submission that you wish to remain confidential and explain why. The IEC may still publish that information if it does not consider it to be confidential but will consult with you before doing so.

Please note that material identified as confidential may be given less weight in the decision-making process than material that is published.

1.6 Meetings

In your submission, you may request a meeting with the IEC to discuss the matter under consultation, stating why you consider a meeting is necessary or desirable.

If appropriate, meetings may be held jointly with other Consulted Persons. Subject to confidentiality restrictions, the IEC will generally make details of matters discussed at a meeting available to other Consulted Persons and may publish them.

1.7 Closing Date and Time

Submissions in response to this Notice of Draft Stage of Rules Consultation should be sent by email to NEM.Retailprocedureconsultations@aemo.com.au, to reach AEMO by 5.00pm (Melbourne time) on 11 March 2020.

All submissions must be forwarded in electronic format (both pdf and Word). Please send any queries about this consultation to the same email address.

Submissions received after the closing date and time will not be valid, and the IEC is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if the IEC does not consider your submission.

1.8 Publication

All submissions will be published on AEMO's website, other than confidential content.

2. Background

This document has been prepared to detail proposed amendments to the B2B Procedures, which have been developed under the IEC's power to manage the ongoing development of B2B Procedures as contemplated by National Electricity Rules (NER) clause 7.17.7(a)(2). The information provided in this consultation meets the requirements for changing the B2B Procedures as detailed in sections 7.17.4 and 8.9 of the National Electricity Rules.

This document also provides information considered by the IEC in determining if a prima facie case exists for amending the B2B Procedures, namely:

- An issues statement (see section 3).
- A summary of changes to the B2B Procedures, including consideration of the B2B Principles (see sections 3 and 5).
- An impact statement, including consideration of the B2B factors (see section 5).

The proposed changes have been considered and recommended by the IEC's Business-to-Business Working Group (B2B-WG).

The impacted Procedures are the:

- B2B Procedure: One Way Notification Process v3.4.
- B2B Procedure: Service Order Process v3.4.
- B2B Procedure: Technical Delivery Specification v3.4.
- B2B Procedure: Meter Data Process v3.4.

3. Scope / Issues Statement

The IEC has developed the changes in this document to improve the functionality of existing B2B transactions and to incorporate routine communication between electricity retail market participants into B2B transactions. These changes were recommended to the IEC by the B2B-WG on behalf of industry.

The members of the B2B-WG are:

| Retailers | Distributors | Metering |
|----------------------------|---------------------|-----------------|
| AGL | AusNet Services | IntelliHUB |
| Alinta Energy | Energy Queensland | PlusES |
| Origin Energy | Endeavour Energy | Vector AMS |
| Red Energy and Lumo Energy | SA Power Networks | |
| Simply Energy | TasNetworks | |

This document lists the proposed changes to the B2B Procedures as developed, discussed, and primarily agreed through the IEC’s consultation with the B2B-WG. The proposed changes under the B2B consultation have an effective date of 10 November 2021.

In summary, the proposed changes are:

- To amend the Service Order Process to:
 - Introduce seven new optional fields to support better communication between Initiators and Recipients of transactions. Currently this information is being communicated using special instructions in the SO.
 - Add a new enumeration to the CustomerType field so that an Allocate NMI request for a NCONUML can be communicated.
 - Clarify that the Supply Abolishment SO can be used in New South Wales.
- To amend the One Way Notification Process to remove the MXN and introduce a new optional field to the MFIN transactions to link this transaction with the initiating SO.
- Increase the maximum file size and introduce a transaction number limit for the MTRD transaction group.

Detailed amendments are shown in the draft B2B Procedures published with this report.

4. Consultation Date Plan

The following table details the proposed consultation date plan:

| Action | Start Date | End Date |
|--|-------------------|------------------|
| IEC to issue notice of consultation for publication by AEMO | 29 November 2019 | |
| Participant submissions to be provided to AEMO | 29 November 2019 | 13 January 2020 |
| Submission receipt date | 13 January 2020 | |
| IEC to consider all valid submissions and prepare the Draft Determination consultation pack, which change-marked procedures | 13 January 2020 | 12 February 2020 |
| AEMO to publish Draft Determination consultation (incl. change marked B2B Procedures) | 12 February 2020 | |
| Participant submissions to Draft Determination to be provided to AEMO | 12 February 2020 | 11 March 2020 |
| Submission receipt date | 11 March 2020 | |
| IEC to consider all valid submissions and prepare the Final Determination report. This includes the change marked procedures | 11 March 2020 | 22 April 2020 |
| AEMO to publish B2B v3.4 Final Determination | 22 April 2020 | |
| B2B Procedures v3.4 effective date* | 10 November 2021* | |

*The IEC requested feedback on this effective date and a majority of respondents indicated a preference for November 2021 implementation. This date is yet to be finalised.

The proposed changes directly have an impact on the Service Order Process, the One Way Notification Process, and the Meter Data Process. This impact statement sets out an overview of the likely impacts (including expected benefits and costs) on B2B Parties and AEMO as a result of the proposed amendments to the B2B Procedures.

4.1 Service Order changes

4.1.1 Metering Service Works

4.1.1.1 Issue Summary and Submissions

A recent change to the National Electricity Rules placed obligations on Retailers to ensure that certain metering works (such as new connections, replacements due to meter fault, and customer-initiated replacements) are carried out in set timeframes.

Experience has shown that additional information is required to be exchanged between the Retailer (Initiator) and their contestable metering providers (Recipient) to ensure that metering work can progress in an orderly and timely fashion. Using existing B2B transactions, participants are currently required to use other ways to convey this information, such as using the special instructions fields, by repurposing other fields not designed for the conveyance of this information, or by using off-market communications methods (phone calls, emails, and spreadsheets). These approaches typically require additional resources in both Initiator and Recipient businesses to manually populate and review this additional information which is time-consuming, error-prone, and can introduce a significant delay in progressing work requests. The changes proposed in this consultation will see critical information included within formal SO fields to ensure that transactions can be managed, tracked, and audited more efficiently.

The requirement to complete fields in a SO are currently categorised as Mandatory, Required, Optional, or Not Required. As the SO is multi-purpose (i.e. will be sent to both Distributors and contestable Metering Providers), the IEC proposes that the requirement to complete a field can be marked “Optional/Not Required” (O/N) — as opposed to Mandatory, Required, Optional, or Not Required — to indicate that an Initiator must obtain agreement from the Recipient before they populate an ‘O/N’ element in the SO. The B2B-WG does not expect the Retailer to populate the new information when they send an SO to the Distributor (in which instance the fields would be treated as optional).

Participants have indicated that the following types of information are currently being communicated in the SO via alternative methods:

- **Purpose of visit** – The current SO does not contain sufficient detail to clearly articulate the reason for the visit. For example, a Meter Service Works (Exchange Meter) request can be triggered as part of a customer-initiated solar upgrade, as the result of a meter malfunction reported to the Retailer by the network, or as part of a family failure.
- **Regulatory classification** – The current SO does not clearly articulate whether a request is part of a customer-initiated request, a Retailer new deployment, or a metering malfunction. These all have different required timeframes under the Rules and as such have different process and reporting requirements.
- **Customer-agreed date** – The current SO does not clearly articulate whether the customer has already agreed to a fixed date or date window for the service to be performed. Understanding this impacts process and reporting requirements for metering businesses.
- **Customer notification method** – where a formal notification of a supply interruption to the customer is required, the lead time for delivering this notice differs based on the method of delivery. This impacts a service provider’s scheduling processes — e.g. a customer who receives their notice via postal services requires scheduling in a shorter timeframe to allow for physical delivery of the letter, whereas a customer receiving notification via digital methods has a longer timeframe before scheduling must occur. An enumerated value(s) will identify the contact method.

- **Customer notification address** (postal or email) – In circumstances where the Retailer has made arrangements for the service provider to generate a Retailer planned interruption notice to the customer on the Retailer’s behalf, the current SO request does not allow for a Retailer to provide the details of the customers contact details, such as the phone number or e-mail address. Specific fields in the SO for this information will allow for better automation.
- **Escalation indicator** – the current SO does not clearly articulate that a SO is to be treated with an agreed level of priority and/or sensitivity over other SOs (e.g. ombudsman, off supply, etc). It is proposed to include a field to designate the level of escalation / urgency.
- **Malfunction exemption details** – the current SO does not allow for details related to AEMO exemptions to be conveyed from the Initiator to the service provider. Understanding the details of any exemption period informs the metering provider which timeframes apply and allows for appropriate scheduling. It is proposed to include fields to allow the exemption code allocated by AEMO and the end date by which the malfunction must be remedied.

To address these issues, additional fields with enumerated lists are proposed to be added to the relevant SO.

The IEC proposal was supported by a majority of participants, with some caveats. Most of the retailers and distributors that responded were in support of the proposed changes.

Ausgrid were not in support of the proposed changes, stating that special instructions is a mandatory field where the initiator wishes to convey to the Recipient. TasNetworks recommended utilising the existing Peer-to-Peer (P2P) transaction to send service orders without going through a schema change.

Endeavour Energy requested future-proofing the schema change by ensuring any future changes do not compel other parties, who are not interested in the changes, from having to make costly system changes. Ausnet Services, Endeavour Energy, PLUS ES and Simply Energy proposed further fields be added to the Metering Service Works service order. PLUS ES raised a concern about lack of clarity regarding the processes by which these service orders will be used and that some fields would also deliver benefits and efficiencies to more than just the few service orders identified.

CitiPower Powercor and United Energy highlighted that these changes were not applicable to Victorian distributors. SA Power Networks also noted that the proposed changes will not be used by Distributors acting as the initial Metering Coordinator (MC) and Metering Provider (MP) for Regulated metering and stated a preference for implementation post July 2021.

4.1.1.2 IEC Assessment

On consideration of participant submissions suggesting participants use special notes or P2P transactions instead of establishing new transactions or fields, moving standardised information from special notes as proposed provides efficiency across industry.

The IEC considers that adding potentially useful fields to transactions would improve market efficiency. To expand the v3.4 service order changes to include an expanded review of all service orders is beyond the scope of this review. An ICF being submitted separately to this review would allow the market to perform a cost/benefit analysis on the proposal.

4.1.1.3 IEC Conclusion

Although various fields can be managed through special notes or P2P transactions, the IEC concludes that it is preferable to manage the additional information with specific transaction fields where possible in the interest of efficiency and standardisation within the market.

Following further discussion by the Business-to-Business Working Group, several of the fields flagged by respondents were added to the proposed enumerated lists as part of the service order.

The IEC recommends that PLUS ES submit an ICF for consideration of its additional suggested changes.

The IEC also acknowledges that:

- These changes are not applicable to Victorian distributors.
- Most respondents expressed a preference for November 2021 implementation.

4.1.2 Supply Abolishment

4.1.2.1 Issue Summary and Submissions

In NSW the field work to abolish supply to a connection point is performed by an Accredited Service Provider (ASP) rather than the Local Network Service Provider (LNSP). This means that a customer engages the ASP directly and the LNSP is not involved in the field work.

For the LNSP to make the NMI extinct in MSATS where a Type 1–4A meter is installed, confirmation from the MP that the metering installation is no longer installed and has been removed from site is required. MPs regularly identify supply abolishment when they investigate communications failures of metering installations. In these instances, the MP would notify the Retailer who would then request that the LNSP make the NMI extinct in MSATS.

Currently the Retailer request to make the NMI extinct is performed via email, or alternately, the MP sends a Notice of Metering Works (NOMW) - Meter Removed transaction to the LNSP (although not all MPs submit a NOMW if they did not perform the meter removal work). Over 6,000 NMI extinctions occurred in NSW in 2018; as such, participants have expressed a desire for this communication to be done via B2B transactions.

The proposed change clarifies that the Supply Abolishment SO can be used in NSW, with the difference that—unlike in other jurisdictions—the use of this SO in NSW will not result in any field work by the LNSP, as the field work will continue to be performed by an ASP. Instead, Retailers will use the Supply Abolishment SO in NSW to request only that the LNSP make the NMI extinct in MSATS.

The majority of respondents were in favour of the proposed changes. Some distributors and one retailer responded “Other” or listed caveats that highlighted differences between jurisdictions. Evoenergy requested that clarity be provided around the use of the service order across jurisdictions. SA Power Networks and United Energy noted that the service order does not apply to Victorian distributors. Red and Lumo Energy noted that the service order does not result in the need for fieldwork in NSW and should not have LNSP fees associated with it.

4.1.2.2 IEC Assessment

On consideration of these submissions, the IEC acknowledges that correct use of the service order is integral to improving market outcomes and efficiency.

The authority to determine LNSP fees is held by the Australian Energy Regulator, not the IEC, and as such the IEC is silent on whether there should be fees associated with the Supply Abolishment service order in NSW.

4.1.2.3 IEC Conclusion

The Service Order Process has been updated to reflect jurisdictional differences and physical processes in order to ensure participants use the service order correctly.

The IEC acknowledges that these changes are not applicable to Victorian distributors.

4.1.3 Allocate NMI

4.1.3.1 Issue Summary and Submissions

The Allocate NMI is a B2B SO that is used when a Retailer wants a site to be registered in MSATS. Usually the Initiator of the Allocate NMI is a Retailer and the Recipient is the LNSP. The LNSP would usually perform a number of validations, such as ensuring the site is not already registered in MSATS and that sufficient addressing information has been provided to identify the site in their Geographic Information System (GIS). If it passes validation then the LNSP must determine the appropriate value for a number of the NMI standing data items (such as distribution loss factor, transmission node identifier, NMI classification, etc), assign a NMI for the site, and assign the Retailer as the Financially Responsible Market Participant (FRMP). The NMI would then be published in MSATS.

With the change of the settlements methodology under Global Settlements, there is now a requirement for NCONUML to be registered in MSATS. However, the Allocate NMI SO does not allow an Initiator to indicate that the request is for a NCONUML, which then allows the LNSP to perform the necessary validation and meet their obligation to populate the NMI Classification as defined by the CATS Procedure.

The proposed change is to add the value of “NCONUML” to the CustomerType field so that Initiators can communicate an Allocate NMI request for a NCONUML via B2B transactions.

The IEC proposal was supported by all but two respondents, with one distributor objecting to the proposal and one retailer presenting caveats. TasNetworks questioned the value of the schema change and how the hub would treat a participant remaining on a n-1 schema. AGL noted that NMI type can be managed through special notes.

4.1.3.2 IEC Assessment

As noted in section 4.1.1, moving standardised information from special notes or bespoke processes such as P2P transactions as proposed provides efficiency across industry. Additionally, AEMO IT have determined it is not possible for a participant to remain on an n-1 schema where the B2B Hub is required to validate a transaction on the basis of an n schema.

4.1.3.3 IEC Conclusion

Although various fields can be managed through special notes or bespoke transactions, the IEC concludes that it is preferable to manage them through standardised transactions and fields, which improve operational efficiency across the market.

4.2 One Way Notification changes

4.2.1.1 Issue Summary and Submissions

The one-way notifications transactions used for informing parties of pending metering works — namely, the MXN and the MFIN — do not currently allow contestable metering providers to include the SO ID when sending a transaction to Retailers. This makes it onerous for the Retailers to match the request back to the original SO. By including the original SO ID with the scheduling information contained in the MXN and MFIN, the Initiator can more efficiently link the jobs.

- The MFIN is an XML-based transaction that is defined by the aseXML schema. Adding in a new optional field to be included within this transaction will result in a schema change.
- The MXN is a pre-Power of Choice transaction that uses a CSV payload to contain one or more notifications for NMIs that are scheduled for a meter exchange. Fields within this payload are comma-separated into a file-like structure. The MXN was developed to meet the

requirements of the Victorian AMI program where Distributors were required to provide notice to Retailers of a pending meter exchange.

While the ability for CSV payloads to carry multiple transactions allows for efficient transport between participants, it also introduces complexity for participant systems in dealing with errors contained within the file — e.g. partial acceptance where one notification is incorrect but the remainder are correct. This is similar to other CSV-based payloads such as MDFF where data can be partially accepted.

Given that the MFIN, which is XML-based, can be used for the same purpose as the MXN and avoids the issue related to partial acceptance of the MXN, as part of the first-round consultation the IEC asked if participants supported the continued usage of the CSV-based MXN or the retirement of the MXN (CSV) transaction.

If industry chooses to retire the MXN (CSV) transaction, there are two options:

1. **Retire the MXN as part of the updating of the MFIN.** This would mean that there would be no need for the proposed changes to the MXN.
2. **Give the MXN an extension past this change window.** This could mean either updating or not updating the MXN. If the MXN is to be used on an ongoing basis, the IEC considers that the proposed updates should be made to the MXN. If it is to be retired within 12 months of the MFIN change, then the benefits will be diluted owing to the shorter timeframe over which they can be realised.

As part of the first-round consultation, the IEC recommended that the MXN be retired (Option 1) and sought feedback from participants on this view.

The majority of respondents supported retiring the MXN and updating the MFIN as part of this work (Option 1). Most participants also stated that a November 2021 implementation period would be preferable, given the timeframe for the schema change. PLUS ES proposed utilising the PIN and MFIN for faults and issues.

4.2.1.2 IEC Assessment

Following PLUS ES's feedback, a broader review of One Way Notifications has been proposed as an option for participants.

4.2.1.3 IEC Conclusion

As the majority of respondents were supportive of removing the MXN, it will be removed from the One Way Notification as part of updating the MFIN.

Question 1: Do you have a preference between using the PIN and/or the MFIN One Way Notifications to notify participants of meter exchange dates? If so, which is your preference and why?

4.3 Increase to transaction size limit for Meter Data

4.3.1.1 Issue Summary & Submissions

As part of the implementation of 5 Minute Settlement (5MS), meter data files will often contain a larger number of rows—for an interval meter over a day, instead of 48 rows, there will be 288. AEMO has therefore recommended that industry increase the maximum file size of the meter data file from 1 to 10 MB.

The simplest way to do this is to increase the maximum message size for the MTRD transaction group; however, this group includes:

- Meter Data Notification (MDN).
- Provide Meter Data (PMD).
- Verify Meter Data (VMD).

The latter two transactions (PMD and VMD) are quite small, and a significant number of transactions could be sent in a 10 MB file. Initial analysis by some businesses has indicated that such a large number of transactions could impact system processing, leading to degradation of participant services.

The IEC, together with AEMO and on the recommendation of the B2B-WG, has considered the issue and proposes two changes to the B2B Technical Delivery Specification that it believes would address the issue:

1. The MTRD group maximum file size be increased from 1 MB to 10 MB.
2. A limit of 1000 transactions per file be applied to the MTRD group.

The fundamental change to the B2B Technical Specification would be to specify the file size for each transaction group, as shown below:

| Transaction Group | Message Size | Transaction Volume Maximum Limit |
|-------------------|--------------|----------------------------------|
| MTRD | 10 MB | 1000 |
| SORD | 1 MB | N/A |
| CDN | 1 MB | N/A |
| SITE | 1 MB | N/A |
| OWNX | 1 MB | N/A |
| NPNX | 1 MB | N/A |

A majority of respondents indicated that they are supportive of a file size increase to 10MB and their systems are capable of accepting this new file size for MTRD transactions. MEA Powershop and Ergon Energy and Energex stated that there may be some issue with processing the transactions but were still supportive of the change as necessary for an adaptive market. The majority of respondents were also in favour of transaction limits being placed on the MTRD group. Evoenergy and Vector Metering objected to the transaction limit. PLUS ES noted that the introduction of a file limit would not necessarily mitigate any potential problems. The latter objected on the basis that it will not mitigate the potential problems of an increased file size.

Similarly, most participants indicated support for a volume limit of 1000 transactions per file for the PMD and VMD transactions. Simply Energy suggested a 2000 transaction limit. Vector Metering objected on the basis that systems and processes should be designed and built to handle any number of transactions that come in a 10MB file.

4.3.1.2 IEC Assessment

No specific problems were identified with the MTRD file size increase and transaction volume limit. Both of these changes are in the interests of efficiency and system robustness. The optimal number of transactions a file can handle will not always be the highest technically possible number. As the

majority of respondents have indicated a 1000-transaction limit for the MTRD transaction group is appropriate, it will be implemented. The IEC will investigate an appropriate effective date for this change in conjunction with AEMO’s 5MS project team.

4.3.1.3 IEC Conclusion

A majority of respondents were in favour of increasing the file size and imposing a transaction limit on MTRD files, including PMD and VMD transactions. As such, the IEC propose to implement these changes.

Section 1.6 in the Technical Specification have also been updated to clearly define one megabyte as 1024 kilobytes in order to maximise clarity within the market.

4.4 B2B Principles

The IEC considers that the B2B Proposal supports each of the B2B Principles as follows:

| B2B Principle | Justification |
|--|--|
| <i>B2B Procedures should provide a uniform approach to B2B Communications in participating jurisdictions.</i> | The proposed B2B Procedures are not jurisdiction-specific and therefore do not create any jurisdictional differences. |
| <i>B2B Procedures should detail operational and procedural matters and technical requirements that result in efficient, effective and reliable B2B Communications.</i> | The proposed B2B Procedures improve the communications and operational processes between participants through the development of consistent information exchange. |
| <i>B2B Procedures should avoid unreasonable discrimination between B2B Parties.</i> | The proposed B2B Procedures do not introduce changes that would discriminate between B2B Parties, as the proposed changes are either optional or apply equally across all parties. |
| <i>B2B Procedures should protect the confidentiality of commercially sensitive information.</i> | The proposed B2B Procedures do not introduce changes that would compromise the confidentiality of commercially sensitive information. |

4.5 B2B Factors

The IEC, on recommendation from the B2B-WG, has determined that the B2B Factors have been achieved for this B2B Proposal as described below.

| B2B Factors | Justification |
|---|---|
| <p><i>The reasonable costs of compliance by AEMO and B2B Parties with the B2B Procedures compared with the likely benefits from B2B Communications.</i></p> | <p>The proposed changes will require an aseXML schema version change; however, participants who do not intend to use these modified transactions can utilise the <i>n-1</i> functionality which will convert the latest version to one prior version with the effect of insulating the change to those who want it.</p> <p>As with all schema changes, this <i>n-1</i> will only delay the need for a participant to upgrade to the latest schema until the next schema version change is deployed.</p> <p>As such, greater information is needed from industry regarding the cost-benefit ratio of each of the proposed changes.</p> |
| <p><i>The likely impacts on innovation in and barriers to entry to the markets for services facilitated by advanced meters resulting from changing the existing B2B Procedures.</i></p> | <p>The proposed B2B Procedures do not impose barriers to innovation or market entry; instead, they allow participants to streamline their operations, better meet the recently introduced regulatory metering timeframes, and allow for all relevant information to be contained within the SO structure to allow for a more efficient support process.</p> |
| <p><i>The implementation timeframe reasonably necessary for AEMO and B2B Parties to implement systems or other changes required to be compliant with any change to existing B2B Procedures.</i></p> | <p>These proposed changes require a new version of the aseXML schema to be generated, which will require a low level of change to participant gateways.</p> <p>AEMO will be required to update the LVI screens to allow the smaller Retailers who to take advantage of these new fields.</p> <p>The timeframe for implementation has balanced the time required for this change and the benefits gained (see below).</p> |

4.6 Benefits

The B2B Proposal supports the B2B Factors in the following ways:

- Metering Service Works SO changes:** As outlined in section 4.1.1, the proposed Metering Service Works change will minimise the need for manual population and review of the SO’s regulatory requirements. This will enable more efficient SO generation, processing, and scheduling.

This change also provides participants with a more efficient process to track and audit SOs, in particular those participants with regulatory obligations.
- Supply Abolishment SO changes:** The proposed Supply Abolishment change create a clear and auditable process for Retailers requesting that a NMI be made extinct in NSW. This would result in customers’ having their account finalised and their final bill issued much sooner as opposed to continuing to receive estimated bills.
- Allocate NMI SO changes:** The proposed Allocate NMI change will provide benefits by allowing the use of a B2B transaction to be used for the request of a NMI for non-contestable unmetered loads.

- **One Way Notification changes:** By allowing for the linking of a meter exchange notice (MFIN or MXN) to the originating SO to allow participants to link SOs and responding actions (e.g. interruption dates), it will facilitate more efficient communications between Retailers and service providers, leading to reduced costs that will ultimately be passed onto customers.
- **MTRD changes:** The proposed changes will ensure that Meter Data Notification files do not now have to be split across several files and will ensure consistency across message size limits between MSATS and B2B Procedures.

4.7 Costs

The following proposed changes will require a schema change:

- To amend the Service Order Process to:
 - Introduce seven new optional fields to support better communication between Initiators and Recipients of transactions.
 - Add a new value to the CustomerType field so that an Allocate NMI request for a NCONUML can be communicated.
- To amend the One Way Notification Process to introduce a new optional field to the MXN and the MFIN transaction to link this transaction with the initiating SO.

The B2B e-Hub supports the current schema version. Validations of the above changes will occur with the current schema in mind. For example, service orders would be rejected if a participant were unable to accept the new NCONUML value in the Allocate NMI Service Order.

When a schema change occurs, participants are expected to update their systems to reflect this update. This is so organisations can uniformly participate in the market and receive the benefit a new schema offers. If your organisation is currently on the previously supported schema version r36, then it must upgrade to the version proposed with this change.

The following proposed changes will require changes to the Low Volume Interface (LVI):

- To amend the Service Order Process to:
 - Introduce seven new optional fields to support better communication between Initiators and Recipients of transactions.
 - Add a new value to the CustomerType field so that an Allocate NMI request for a NCONUML can be communicated.
- To amend the One Way Notification Process to introduce a new optional field to the MXN and the MFIN transaction to link this transaction with the initiating SO.

Participants should consider the impact of the proposed changes, including:

- The costs and resources required to implement the changes and the required ongoing operational cost and resources.
- Participants' ability to implement the changes on the proposed date, considering other known or upcoming industry changes as well as any internal projects.

A majority of participants had no concerns about the costs associated with the changes given the implementation date will be 10 November 2021. Evoenergy, MEA Powershop, SA Power Networks and TasNetworks had particular concerns about the overall volume of change in the market. However, the proposed improvements reflect a bundling of changes for other B2B transactions not modified since 1 December 2017. The efficiency gains from the proposed changes are also expected to result in a cost reduction for organisations of all sizes.

4.8 MSATS Procedures

AEMO has advised that there is no assessed impact to the Market Settlements and Transfers Solution (MSATS) Procedures as a result of this B2B Proposal.

5. Other matters

5.1 Consultation timeframes

B2B schema releases are generally deployed in May or November, but AEMO is unable to deliver a schema change to B2B systems in November 2020 due to pre-existing 5MS commitments.

The IEC is conscious that this consultation is occurring in a changing external regulatory environment, with a number of known changes proposed for implementation in the next two years. While the scope and timing of some of these are well known, the timing and impact on B2B processes for other initiatives are less clear at this stage.

The below table outlines the changes that are currently in the public domain. These changes will not impact all participants equally, with variation by participant category and jurisdictions (in some cases).

| Reform | Effective date |
|----------------------------|---|
| Consumer Data Right | TBC, late 2020–sometime 2021 |
| 5 Minute Settlement | 1 July 2021 |
| Global Settlement | 6 February 2022 |
| Default Market Offer 2 | 1 July 2020 |
| Embedded Networks | TBC |
| Customer Switching | TBC, December 2020 |
| MSATS Standing Data Review | TBC, consultation commencing mid-Feb 2020 |
| Stand-alone Power Systems | TBC, expected mid-2021 |
| Wholesale Demand Response | AEMC Final Determination due in December 2020 |

The initial report of this consultation requested participants indicate which implementation date they would prefer out of 2 December 2020 or November 2021. A majority of participants expressed preference for the latter.

Given the number of reforms with an effective date of 1 July 2021, the IEC does not believe that May 2021 will be an acceptable implementation date for B2B system changes, which therefore means that the next available opportunity to deliver a B2B schema change is November 2021. As such, the proposed implementation date for the changes proposed in this consultation is 10 November 2021.

5.2 New Verify Standing Data Transaction

The B2B-WG have been considering the introduction of new transactions to support the verification of current MSATS standing data with a data owner (LNSP, Retailer, MDP or MP). This circumstance is usually the result of receiving alternate information from another source that may call into question the validity of the MSATS data. Currently these interactions occur outside of formal B2B transactions (generally via email exchange) and rely on manual handling within participant businesses. Initial investigations indicate that queries are at volumes to justify the development of a formal B2B transaction.

If this change was to be pursued, it is proposed that two new transactions would be created:

- Verify Standing Data Request – this transaction would be sent in order for the Recipient to verify the standing data in MSATS (and update MSATS where required). This transaction would contain details related to the nature of the request, e.g. tariff mismatch, address updates, NMI abolishment, NMI status mismatch, or meter status mismatch.
- Verify Standing Data Response – this transaction would be sent from the Recipient in response to a Verify Standing Data Request and will contain a description of the action taken.

These transactions will not be included in this release and version of B2B Procedures and require further input from industry participants to determine if there is broader levels of support and tangible benefits that would warrant further work on this initiative.

Participants should take into account the work that AEMO has completed under the MSATS Standing Data Review¹ and be aware that AEMO is about to commence further work on this project. Feedback given during the initial stage of this consultation will be incorporated into the MSATS Standing Data Review. This may therefore resolve current issues and therefore remove the need for any additional B2B transactions.

A majority of respondents did not see value in developing new Verify Standing Data transactions. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review.

¹ See here for the consultation page: <https://www.aemo.com.au/Stakeholder-Consultation/Consultations/MSATS-NMI-Standing-Data-Consultation>

6. B2B Proposal

The proposed changes are detailed within the attached draft procedures published with this report.

Appendix A: Consolidated participant responses to initial consultation

1. Issues Paper - Metering Service Works (Section 5.1.1)

| Reference No | Question No | Respondent Name | Comments | IEC Response |
|---|-------------|-----------------|---|--|
| Question 1: Do you support the changes detailed in section 5.1.1? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”) | | | | |
| 1 | 1 | AGL | AGL supports the inclusion of Regulatory Reason and believes other information is available through other processes. | The IEC notes the respondent’s support for the proposed Regulatory Reason and notes the respondent’s comment for the other information. |
| 2 | 1 | AusNet Services | Yes. AusNet Services, in principle, supports the addition of these fields; however, enumeration and additional validation would be required to be able to continue the automated processing of these Service order types. Further information can be found in AusNet’s feedback to the specific procedure. | The IEC notes the respondent’s support for the proposed change. Further responses are provided in Table 10. |
| 3 | 1 | AUSGRID | NO Special instructions is a mandatory field where the initiator wishes to convey to the Recipient. ‘High Priority’ service order requests are defined as same day or next day Re-energisations or cancellations of same day Re-energisations or De-energisations. Our system is designed as per the B2B Procedure Technical Delivery Specification which outlines timing requirements and summarises the required timeframe within which a DNSP must | The IEC notes the respondent’s comment. The proposed changes detailed in section 5.1.1 are a way to minimise the use of special instructions and provide efficiency across industry. |

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| | | | use reasonable endeavours to complete each type of Service order request, by having this additional field will not prioritise urgency. | |
| 4 | 1 | CitiPower Powercor | Other – not applicable to Victorian DBs | The IEC notes the respondent’s comment. |
| 5 | 1 | Endeavour Energy | Yes, we support the proposed change because it makes it clear that agreement from the recipient is required before these new fields are utilised. We note that a schema change is required to include these new fields which means that parties who do not intend to use these fields are impacted by the change. We request AEMO consider the technological solutions for B2B messaging such that any future changes does not compel other parties, who are not interested in the changes, from having to make costly system changes. | The IEC notes the respondent’s comment. It is not currently possible to include an unversioned enumerated list in a B2B transaction. AEMO notes it is exploring technological solutions to deliver more flexibility in the future. |
| 6 | 1 | Evoenergy | Yes | The IEC notes the respondent’s support for the proposed change. |
| 7 | 1 | MEA Powershop | Yes. | The IEC notes the respondent’s support for the proposed change. |
| 8 | 1 | PLUS ES | Other – Details/feedback provided against specific fields in Comments field of Section 1. PLUS ES’ concern is that the approach in some instances presumes a process and as such have resulted in a field or enumeration being introduced. Some fields would also deliver benefits and efficiencies to more than just the few service orders identified. | The IEC notes the respondent’s comment. Further responses are provided in Table 10. The IEC notes that an expanded review of all service orders may be considered for future assessment. The IEC recommends that PLUS ES submit an ICF for |

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| | | | | consideration of the suggested changes. |
| 9 | 1 | Red Energy and Lumo Energy | Yes. Red Energy and Lumo Energy (Red and Lumo), support the changes in section 5.1.1. | The IEC notes the respondent's support for the proposed change. |
| 10 | 1 | SA Power Networks | Other – These changes will not be used by Distributors acting as the initial MC and MP for Regulated metering, however will have an impact on the B2B schema. We support changes that improve the services to customers to obtain their required metering but have a preference to minimise any further changes ahead of July 2021 (5MS/GS). | The IEC notes the respondent's support for the proposed change and have moved the effective date to November 2021 after 5MS/GS commences. |
| 11 | 1 | Simply Energy | Supports all except <i>PurposeforVisit</i> as this can be complex/difficult for training due to potential overlaps. Some of the suggested enumerations are an overlap that need to be addressed, e.g. relocate existing meter enumeration is same as 'move meter' subtype, new connection is same as new meter deployment, etc. Suggest we either remove this as a standalone field and merge it with other relevant fields where appropriate, e.g. <i>RegClassification</i> , etc. | The IEC notes the respondent's support for the proposed changes and refers to Table 10 for further discussion on <i>PurposeforVisit</i> . |
| 12 | 1 | Tango Energy | Tango Energy supports the changes detailed in section 5.1.1 believing the changes will assist with our business processes. | The IEC notes the respondent's support for the proposed change. |
| 13 | 1 | TasNetworks | No. Rather than introduce these new proposed fields in the Service Order Process which requires a B2B schema change, TasNetworks would recommend that consideration be given to utilising the existing function available via the Peer-to-Peer (P2P) transaction, which was introduced during the PoC reforms. | The IEC notes the respondent's comment and the option provided. The proposed changes detailed in section 5.1.1 are a way to minimise the use of special instructions, introduce consistency for participants rather than use |

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| | | | <p>By utilising the P2P transaction it will eliminate the need for a schema change on participants that have no direct need to use the new fields. Participants could also bi-laterally agree to commence using the P2P immediately, not having to wait until a schema change is made. Additionally, where small volumes prevail that require this data by agreement, participants could continue to use the special instructions to transport the information, again negating the need for a schema change. The P2P transaction may also provide a further level of flexibility to allow parties to agree what data attributes and values are appropriate for their specific needs, which may also evolve over time.</p> <p>If this change was to proceed, then even if participants (e.g. DNSP) who do not need to utilise the new fields choose to stay on n-1 schema until a second schema change is introduced, they will be required to incur cost and effort to make system changes to cater for the introduction of these fields at a later date.</p> | bespoke processes, and provide efficiency across industry. |
| 14 | 1 | United Energy | Other – not applicable to Victorian DBs | The IEC notes the respondent's comment. |
| 15 | 1 | Vector Metering | Yes | The IEC notes the respondent's support for the proposed change. |
| Question 2: Are there additional enumerated fields whose addition to the Metering Service Works SO the IEC should consider? Please detail them. | | | | |
| 16 | 2 | AGL | <p>None Identified at this time.</p> <p>Although AGL notes that the AEMC PoC review is being undertaken in 2020 and could result in the need for future changes.</p> | The IEC notes the respondent's comment. |

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| 17 | 2 | AusNet Services | <p>Suggest adding the additional communication methods for 'CustomerNotificationMethod' fields.</p> <p>Further information can be found in AusNet's feedback to the specific procedure.</p> | The IEC notes the respondent's comment. It is currently not possible to make a field mandatory dependent on another field being selected. Further responses are provided in Table 10. |
| 18 | 2 | AUSGRID | NO | The IEC notes the respondent's comment. |
| 19 | 2 | Endeavour Energy | <p>We wish to suggest other additional fields to be added: Section Number and DP Number. These fields are required to uniquely identify a parcel of land for the Allocate NMI process. Currently as a work around the FormNumber and the FormReference fields are used, however given that this change requires a schema change we believe that this is an opportunity to define appropriate fields for this information. We have also requested for the same fields to be included in MSATS under the MSATS Standing Data Review program with the aim to have these two additional fields available end to end from the Allocate NMI to NMI Discovery.</p> | The IEC notes the respondent's comment. Section Number and DP Number are specific address identification fields within the NSW jurisdiction and outside the scope of this consultation. The IEC recommends that Endeavour Energy submit an ICF for consideration of the suggested fields. |
| 20 | 2 | Evoenergy | No | The IEC notes the respondent's comment. |
| 21 | 2 | MEA Powershop | No. | The IEC notes the respondent's comment. |
| 22 | 2 | PLUS ES | <p>As per feedback provided in the Comment field in Section 1. In addition to the existing proposed fields or associated enumerations PLUS ES would like to propose the following to be considered:</p> | The IEC notes the respondent's comment and refer to the response to Table 1, Item 8. |

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| | | | <ul style="list-style-type: none"> Advanced communications – with the introduction of customer refusal, fields or enumerations, instead of Special Instructions, would remove a lot of ambiguity and errors associated with these requests. In addition, the volume of these requests is slowly increasing and whilst very small, they still require a large resource effort to rectify. Embedded Network changes – possible enhancements to accommodate the industry changes earmarked for the Embedded Networks. | <p>In addition:</p> <ul style="list-style-type: none"> The IEC has proposed to add communications remove due to customer refusal/communications add following customer acceptance to the <i>PurposeforVisit</i> field. The IEC notes that the final details of the proposed Embedded Network changes have not yet been made available. |
| 23 | 2 | Red Energy and Lumo Energy | Red and Lumo have no additional requirements | The IEC notes the respondent's comment. |
| 24 | 2 | SA Power Networks | No | The IEC notes the respondent's comment. |
| 25 | 2 | Simply Energy | Two more to be considered: <ul style="list-style-type: none"> - Multi-occupancy - Battery/VPP connection | The IEC notes the respondent's suggestions and refers to Table 10 for further details. |
| 26 | 2 | Tango Energy | Not at this time. | The IEC notes the respondent's comment. |
| 27 | 2 | TasNetworks | No. | The IEC notes the respondent's comment. |

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| 28 | 2 | Vector Metering | No | The IEC notes the respondent's comment. |
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2. Issues Paper - Supply Abolishment (Section 5.1.2)

| Reference No | Question No | Respondent Name | Comments | IEC Response |
|--|-------------|--------------------|--|---|
| Question 3: Do you support the changes detailed in section 5.1.2? (Answer should be one of “Yes” / “No” / “Other – provide reason”) | | | | |
| 1 | 3 | AGL | AGL supports the changes for NSW Supply abolishment | The IEC notes the respondent’s support for the proposed change. |
| 2 | 3 | AusNet Services | Yes. However, the hierarchy of rules needs to be considered. Further information can be found in AusNet’s feedback to the specific procedure. | The IEC notes the respondent’s support for the proposed change. |
| 3 | 3 | AUSGRID | YES | The IEC notes the respondent’s support for the proposed change |
| 4 | 3 | CitiPower Powercor | Other – not applicable to Victorian DBs | The IEC notes the respondent’s comment. |
| 5 | 3 | Endeavour Energy | Yes, we support the proposed change because it will help to clarify how the Supply Abolishment service order can be used in NSW. | The IEC notes the respondent’s support for the proposed change. |
| 6 | 3 | Evoenergy | Other – support the change but it must be clear that this SORD type means customers site no longer has a service cable to their premise and the meter is removed. SORD type has been used incorrectly in the past , with customers just doing renovations on the premise and needed to install a new switchboard, old meters removed with old | The IEC notes the respondent’s support for the proposed change and note the detail added specific to ACT as per Table 10, Item 8. |

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|----|---|----------------------------|---|---|
| | | | switchboard and new not yet ready, LNSP received an abolishment from retailer. LNSP made NMI Extinct, only to find the next day new meters installed with new MP. | |
| 7 | 3 | MEA Powershop | Yes. | The IEC notes the respondent's support for the proposed change. |
| 8 | 3 | PLUS ES | Yes - in the absence of a robust industry NMI Abolishment process, PLUS ES supports the changes with respect to provisioning the information of a supply abolishment to trigger the NSW DB to make the NMI extinct. | The IEC notes the respondent's support for the proposed change. |
| 9 | 3 | Red Energy and Lumo Energy | Other. Red and Lumo support the proposed changes. However, since the use of the Supply Abolishment SO in NSW does not result in the need for any field work, unlike other jurisdictions, we believe it should be made clear that there should not be any fees associated with this specific SO for NSW. | The IEC notes the respondent's support for the proposed change. The IEC notes that fees are determined by the AER and are outside the scope of the IEC. |
| 10 | 3 | SA Power Networks | Other – Changes only applicable to NSW. | The IEC notes the respondent's comment. |
| 11 | 3 | Simply Energy | Yes | The IEC notes the respondent's support for the proposed change. |
| 12 | 3 | Tango Energy | Yes. | The IEC notes the respondent's support for the proposed change. |
| 13 | 3 | TasNetworks | Yes. | The IEC notes the respondent's support for the proposed change. |

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|----|---|-----------------|---|---|
| 14 | 3 | United Energy | Other – not applicable to Victorian DBs | The IEC notes the respondent's comment. |
| 15 | 3 | Vector Metering | Yes | The IEC notes the respondent's support for the proposed change. |

3. Issues Paper - Allocate NMI (Section 5.1.3)

| Reference No | Question No | Respondent Name | Comments | IEC Response |
|---|-------------|--------------------|--|---|
| Question 4: Do you support the changes detailed in section 5.1.3? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”) | | | | |
| 1 | 4 | AGL | AGL notes that the NMI type can be managed through Special Notes. | The IEC notes the respondent’s comment. The proposed changes detailed in section 5.1.3 are a way to minimise the use of special notes and provide efficiency across industry. |
| 2 | 4 | AusNet Services | Yes. | The IEC notes the respondent’s support for the proposed change. |
| 3 | 4 | AUSGRID | YES | The IEC notes the respondent’s support for the proposed change. |
| 4 | 4 | CitiPower Powercor | Yes | The IEC notes the respondent’s support for the proposed change. |
| 5 | 4 | Endeavour Energy | Yes, we support the change because it will allow for retailers to better communicate when a NMI request is for a non-contestable unmetered load. | The IEC notes the respondent’s support for the proposed change. |

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| 6 | 4 | Evoenergy | Yes | The IEC notes the respondent's support for the proposed change. |
| 7 | 4 | MEA Powershop | Yes. | The IEC notes the respondent's support for the proposed change. |
| 8 | 4 | PLUS ES | Yes | The IEC notes the respondent's support for the proposed change. |
| 9 | 4 | Red Energy and Lumo Energy | Yes. Red Energy and Lumo Energy (Red and Lumo), support the changes in section 5.1.3 | The IEC notes the respondent's support for the proposed change. |
| 10 | 4 | SA Power Networks | Yes – however, happy for this change to be held off until after July 2021 (5MS/GS). | The IEC notes the respondent's support for the proposed change. |
| 11 | 4 | Simply Energy | Yes | The IEC notes the respondent's support for the proposed change. |
| 12 | 4 | Tango Energy | Yes. | The IEC notes the respondent's support for the proposed change. |
| 13 | 4 | TasNetworks | No. TasNetworks questions the cost v's benefit aspect of this change given it requires a B2B schema version change. What would the AEMO B2B hub do if a participant remains on n-1, as this is a mandatory field? Would the hub not pass through | The IEC notes the respondent's comment and refer to the response to Table 1, Item 13. If there is a schema update, participants are expected to |

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| | | | <p>this attribute and participants systems would then be required to manage a mandatory field not being provided?</p> <p>TasNetworks currently manage allocation of such NMI's by identifying the appropriate NMI Classification from the Network Connection Application process and/or the EWR.</p> <p>Alternatively, the Special Instructions field could be used by the Retailer to provide this information.</p> | <p>reflect this. The B2B hub would pass through this attribute.</p> |
| 14 | 4 | United Energy | Yes | The IEC notes the respondent's support for the proposed change. |
| 15 | 4 | Vector Metering | Yes | The IEC notes the respondent's support for the proposed change. |

4. Issues Paper - One Way Notification changes (Section 5.2)

| Reference No | Question No | Respondent Name | Comments | IEC Response |
|--|-------------|--------------------|--|--|
| Question 5: Given that the MFIN, which is XML-based, can be used for the same purpose as the MXN and avoids the issue related to partial acceptance of the MXN, do participants support the continued usage of the CSV-based MXN? | | | | |
| 1 | 5 | AGL | AGL does not support the removal of the MXN at this time, but notes that the AEMC PoC review may require further changes to industry processes. | The IEC notes the respondent's comment. Given the majority of respondents supported the removal of the MXN, the IEC has decided to remove the transaction. |
| 2 | 5 | AusNet Services | No comment. | The IEC notes the respondent's comment. |
| 3 | 5 | AUSGRID | NFA | The IEC notes the respondent's comment. |
| 4 | 5 | CitiPower Powercor | No, no longer required for Vic DBs | The IEC notes the respondent's support for the removal of the MXN. |
| 5 | 5 | Endeavour Energy | We do not support the continued usage of the CSV-based MXN if the MFIN provides the same purpose. This would help to reduce the need to support a duplicate transaction. | The IEC notes the respondent's support for the removal of the MXN. |
| 6 | 5 | Evoenergy | No | The IEC notes the respondent's support for the removal of the MXN. |

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| 7 | 5 | MEA Powershop | Powershop does not see the need to continue using the MXN given the MFIN can be used for the same purpose of the MXN. | The IEC notes the respondent's support for the removal of the MXN. |
| 8 | 5 | PLUS ES | <p><u>General</u></p> <p>Currently there are 2 OWN which support the notification of meter exchange dates and used in the industry:</p> <ul style="list-style-type: none"> • MXN – CSV payload • PIN - XML based <p>The proposal seeks to introduce a 3rd option, the MFIN OWN. This would involve renaming and repurposing the MFIN.</p> <p>PLUS ES does not agree to have the MFIN amended and repurposed to include and support the process of a meter exchange notification:</p> <ul style="list-style-type: none"> • The PIN OWN currently exists and could serve the purpose as per BAU participant agreed practices • The participants incurring extra cost to implement the system and business process changes with no additional benefits; especially in a period where the industry is undergoing significant changes. i.e the current use of the MFIN vs the intended use of a repurposed transaction. • Not all participants would be inclined to make the changes – system/business processes. i.e. there would not be a consistent approach in participant processes. Participants would still have to build for variances. <p><u>Question 5</u></p> <p>PLUS ES currently uses the MXN to notify several participants of the meter exchange schedule date; we support the continued usage of the CSV – based MXN for the immediate future.</p> | The IEC notes the respondent's comment. Given the majority of respondents supported the removal of the MXN, the IEC has decided to remove the transaction. The IEC notes the respondent's discussion on the usage of MFIN and PIN and that an expanded review of these One Way Notifications (OWNs) may be considered for future assessment. The IEC notes that regardless of the OWN used, that a Service Order ID link is required to deliver industry efficiencies. |

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| 9 | 5 | Red Energy and Lumo Energy | Yes. Red Energy and Lumo Energy (Red and Lumo), support the continued use of CSV-based MXN section 5.2 | The IEC notes the respondent's comment. Given the majority of respondents supported the removal of the MXN, the IEC has decided to remove the transaction. |
| 10 | 5 | SA Power Networks | SA Power Networks has never used the MXN transaction and there is no plans or requirements to alter this position. | The IEC notes the respondent's support for the removal of the MXN. |
| 11 | 5 | Simply Energy | No, we prefer a cleaner suite of transactions, hence any redundant transactions should be reviewed and cleaned up as we progress. | The IEC notes the respondent's support for the removal of the MXN. |
| 12 | 5 | Tango Energy | Tango Energy supports retiring the CSV-based MXN transaction. | The IEC notes the respondent's support for the removal of the MXN. |
| 13 | 5 | TasNetworks | Yes, MXN should continue to be used. TasNetworks do not support the change to the MFIN to add the ServiceOrderID field and additional ReasonForNotice value. TasNetworks recommend that the MXN be modified and used for this purpose. This assumes it would remove the need for a schema update to support this change, and more so aligns with the intent of the transactions as described in the B2B Guide. | The IEC notes the respondent's comment. Given the majority of respondents supported the removal of the MXN, the IEC has decided to remove the transaction. |
| 14 | 5 | United Energy | No, no longer required for Vic DBs | The IEC notes the respondent's comment. |

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| 15 | 5 | Vector Metering | Having multiple transactions for the same purpose introduces complication to the change process. i.e. any change requested to one transaction should be made to the other transactions used for the same purpose. We support a review of the use of the MXN and its retirement but recommend that consideration of the PIN transaction as a replacement – rather than the MFIN. It has come to our attention that other participants currently use the PIN transaction over the MXN or MFIN. We believe the use of PIN would avoid the confusion that is likely in using the MFIN for purposes other than faults and issues. | The IEC notes the respondent's support for the removal of the MXN. |
| Question 6: If the MXN were to be retired, would your organisation prefer Option 1 or Option 2 as presented above? | | | | |
| 16 | 6 | AGL | See above | The IEC notes the respondent's comment and refer to the response to Table 4, Item 1. |
| 17 | 6 | AusNet Services | No comment. | The IEC notes the respondent's comment. |
| 18 | 6 | AUSGRID | NFA | The IEC notes the respondent's comment. |
| 19 | 6 | CitiPower Powercor | Option 1 | The IEC notes the respondent's support for the removal of the MXN as part of the updating of the MFIN. |
| 20 | 6 | Endeavour Energy | We prefer option 1 (Retire the MXN as part of the updating of the MFIN), but also happy to support option 2 (Give the MXN an extension past this change window). | The IEC notes the respondent's support for the removal of the MXN as part of the updating of the MFIN. |

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| 21 | 6 | Evoenergy | Option 1 | The IEC notes the respondent's support for the removal of the MXN as part of the updating of the MFIN. |
| 22 | 6 | MEA Powershop | Powershop would prefer Option 1. | The IEC notes the respondent's support for the removal of the MXN as part of the updating of the MFIN. |
| 23 | 6 | PLUS ES | PLUS ES supports Option 2, acknowledging that there is also a 3 rd option as per PLUS ES comments against the OWN changes – General. | The IEC notes the respondent's comment and refers to the response in Table 4, Item 8. |
| 24 | 6 | Red Energy and Lumo Energy | Should industry decide to retire the MFX (which we do not support) -- Red and Lumo would prefer option 1 - retire the MXN as part of updating the MFIN. | The IEC notes the respondent's choice of the removal of the MXN as part of the updating of the MFIN. |
| 25 | 6 | SA Power Networks | MXN not used – see response to Q5. | The IEC notes the respondent's comment and refers to the response in Table 4, Item 10. |
| 26 | 6 | Simply Energy | Option 1, retire the MXN as part of the updating of the MFIN. | The IEC notes the respondent's support for the removal of the MXN as part of the updating of the MFIN. |
| 27 | 6 | Tango Energy | Option 1 - Retire the MXN as part of the updating of the MFIN. This would mean that there would be no need for the proposed changes to the MXN. | The IEC notes the respondent's support for the removal of the MXN as part of the updating of the MFIN. |

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| 28 | 6 | TasNetworks | Option 1. TasNetworks do not currently support use of the MXN, therefore would not be impacted by retiring it. | The IEC notes the respondent's support for the removal of the MXN as part of the updating of the MFIN. |
| 29 | 6 | United Energy | Option 1 | The IEC notes the respondent's support for the removal of the MXN as part of the updating of the MFIN. |
| 30 | 6 | Vector Metering | Option 2 – Sunset clause; | The IEC notes the respondent's comment. Given the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |
| Question 7: If the MXN were to be retired, what would be the appropriate timeframe in which to retire it? | | | | |
| 31 | 7 | AGL | AGL is not in a position to retire the MFIN at this time. | The IEC notes the respondent's comment. Given the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |
| 32 | 7 | AusNet Services | No comment. | The IEC notes the respondent's comment. |
| 33 | 7 | AUSGRID | NFA | The IEC notes the respondent's comment. |

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| 34 | 7 | CitiPower Powercor | At the same time as implementing this package of changes | The IEC notes the respondent's comment. Given the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |
| 35 | 7 | Endeavour Energy | We believe if option 2 is to be adopted then 12 months from the final determination of this consultation should be sufficient. | The IEC notes the respondent's comment. Given the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |
| 36 | 7 | Evoenergy | N/A | The IEC notes the respondent's comment. |
| 37 | 7 | MEA Powershop | A 12 month retirement period would allow sufficient time for the MXN to be retired in a way that will not have an adverse impact on industry nor customers. | The IEC notes the respondent's comment. Given the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |
| 38 | 7 | PLUS ES | Given the changes happening in the industry over the next 2 years, PLUS ES would support the retirement of the MXN, following the 5MS and Global settlement changes as part of a process efficiency enablement; late 2022. | The IEC notes the respondent's comment. Given the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |

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| 39 | 7 | Red Energy and Lumo Energy | Red and Lumo would ideally see the changes made aligned with the other transfer changes mentioned. | The IEC notes the respondent's comment. Given the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |
| 40 | 7 | SA Power Networks | MXN not used – see response to Q5. | The IEC notes the respondent's comment and refer to the response to Table 4, Item 10. |
| 41 | 7 | Simply Energy | Not sure, this will be participant-specific as participants who wish to stay on current schema might still be able to use it even if new schema no longer have this transaction. | The IEC note that B2B transactions are a two way bilateral arrangement and for continued use of the MXN a participant would need to seek other participant agreements outside of the B2B framework. |
| 42 | 7 | Tango Energy | Retire the MXN at part of the next B2B implementation currently proposed for December 2020. | The IEC notes the respondent's comment. Given the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |
| 43 | 7 | TasNetworks | TasNetworks do not currently support use of the MXN, therefore would not be impacted by the timing of retiring it. | The IEC notes the respondent's comment. |
| 44 | 7 | United Energy | At the same time as implementing this package of changes | The IEC notes the respondent's comment. Given |

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| | | | | the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |
| 45 | 7 | Vector Metering | Depends on the implementation date of the v3.4 procedures. If the Industry decides that v3.4 should be effective in Dec 2020 then MXN can be grandfathered until Nov 2021, otherwise it should be when v3.4 become effective (Nov 2021). | The IEC notes the respondent's comment. Given the majority of respondents nominated a November 2021 implementation period, the MXN would be retired at this time. |

5. Issues Paper - Increase to transaction size limit for Meter Data (Section 5.3)

| Reference No | Question No | Respondent Name | Comments | IEC Response |
|---|-------------|--------------------|--|--|
| Question 8: Will a 10 MB maximum file size for MTRD transactions cause substantial problems for your organisation? | | | | |
| 1 | 8 | AGL | 10MB has been assessed and with transaction limits should be acceptable. | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 2 | 8 | AusNet Services | No. | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 3 | 8 | AUSGRID | NO | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 4 | 8 | CitiPower Powercor | No | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |

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| 5 | 8 | Endeavour Energy | No, a 10MB with a 1000 limit on the PMD and VMD is appropriate. | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 6 | 8 | Ergon Energy and Energex | Although this will cause some problems we agree with the need for a file size increase. | The IEC notes the respondent's comment. |
| 7 | 8 | Evoenergy | Restrict to MTRD only, then all good | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 8 | 8 | MEA Powershop | For incoming MTRD transaction, we expect that potentially we may have some issues with processing as we serialise the transactions (i.e. one transaction at a time), but this isn't an immediate threat to our system. | The IEC notes the respondent's capability. |
| 9 | 8 | PLUS ES | The concern would be that PLUS ES as a Meter provider would get flooded with transactions. | The IEC notes the respondent's comment and notes the majority support for limiting the number of transactions in a file. |
| 10 | 8 | Red Energy and Lumo Energy | Red and Lumo do not envisage there to be any substantial problems. | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 11 | 8 | SA Power Networks | No | The IEC notes the respondent's capability to |

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| | | | | accept a maximum of 10MB file size for MTRD transactions. |
| 12 | 8 | Simply Energy | No | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 13 | 8 | Tango Energy | No. | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 14 | 8 | TasNetworks | No. As part of 5ms/GS system changes being implemented by TasNetworks, modifications will be made to ensure inbound and outbound 10MB file sizes are managed appropriately. | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 15 | 8 | United Energy | No | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |
| 16 | 8 | Vector Metering | No | The IEC notes the respondent's capability to accept a maximum of 10MB file size for MTRD transactions. |

| Question 9: Does limiting the number of transactions within the MTRD group mitigate the potential problems caused by an increased maximum file size? | | | | |
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| 17 | 9 | AGL | 10MB has been assessed and with transaction limits should be acceptable. Without transaction limits, this file size will be problematic for excessive transactions. | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 18 | 9 | AusNet Services | AusNet Services would like to know how the count of transactions is expected to be calculated, i.e. based on the number of 200 records in a file? | The IEC notes that the count is based on 1,000 individual transaction IDs. |
| 19 | 9 | AUSGRID | YES | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 20 | 9 | CitiPower Powercor | Yes | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 21 | 9 | Endeavour Energy | Yes, a 10MB with a 1000 limit on the PMD and VMD is appropriate. | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 22 | 9 | Ergon Energy and Energex | We believe this will mitigate the problems caused by 10 MB files. | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |

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| 23 | 9 | Evoenergy | No | The IEC notes the respondent's comment. |
| 24 | 9 | MEA Powershop | We would expect that this would mitigate potential issues with our system. | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 25 | 9 | PLUS ES | It will not mitigate the potential problems. | The IEC notes the respondent's comment. |
| 26 | 9 | Red Energy and Lumo Energy | Red and Lumo support limiting the number of transactions within the MTRD. | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 27 | 9 | SA Power Networks | Yes | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 28 | 9 | Simply Energy | Yes | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 29 | 9 | Tango Energy | Yes. | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 30 | 9 | TasNetworks | Yes. | The IEC notes the respondent's support for a limit |

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| | | | TasNetworks believes limiting the number of transactions is appropriate mitigation. | on the number of transactions within the MTRD group. |
| 31 | 9 | United Energy | Yes | The IEC notes the respondent's support for a limit on the number of transactions within the MTRD group. |
| 32 | 9 | Vector Metering | No – Don't support a transaction volume limit for the MTRD. | The IEC notes the respondent's comment. The majority of respondents were in favour of a transaction volume limit, so it will be implemented in the interests of efficiency and system robustness. |
| Question 10: Is the volume limit of 1000 transactions per file appropriate for the PMD and VMD transactions? | | | | |
| 33 | 10 | AGL | AGL considers 1000 to be an appropriate limit. | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 34 | 10 | AusNet Services | Yes. | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 35 | 10 | AUSGRID | YES | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 36 | 10 | CitiPower Powercor | Yes | The IEC notes the respondent's support for a limit of 1,000 transactions. |

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| 37 | 10 | Endeavour Energy | Yes, a 10MB with a 1000 limit on the PMD and VMD is appropriate. | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 38 | 10 | Ergon Energy and Energex | We suggest that the 1,000 limit is too low as we have already seen files less than 1 MB in size with more than 1,000 transactions. However, some testing is required to determine what a suitable limit would be. | The IEC notes the respondent's comment. As the majority of respondents have indicated a 1,000 limit is appropriate, it will be implemented. |
| 39 | 10 | Evoenergy | Yes | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 40 | 10 | PLUS ES | Yes | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 41 | 10 | Red Energy and Lumo Energy | Red and Lumo agree that the volume is appropriate. | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 42 | 10 | SA Power Networks | Yes | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 43 | 10 | Simply Energy | No, as we've already seen more than a 1000 PMD transactions compressed in a 1MB file (about 1400 transactions) and hence to minimise the impact, we suggest 2000 transactions to be the upper limit instead. | The IEC notes the respondent's comment. As the majority of respondents have indicated a 1,000 limit is appropriate, it will be implemented. |

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| 44 | 10 | Tango Energy | Yes, the transaction volume of 1000 per file for PMD, VMD and MDN is appropriate. | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 45 | 10 | TasNetworks | Yes, TasNetworks believes this is appropriate. | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 46 | 10 | United Energy | Yes | The IEC notes the respondent's support for a limit of 1,000 transactions. |
| 47 | 10 | Vector Metering | No – Do not support a transaction limit for the PMD or VMD. Current 1MB file can contain more than 1000 transactions. Systems and processes should be designed and built to handle any number of transactions that come in a 10MB file. Vector notes that it should be rare that there would be high volumes of PMD requests as this would indicate a consistent and material issue in meter data delivery (the trigger for the Provide Meter Data request in the first instance). | The IEC notes the respondent's comment. The optimal number of transactions a file can handle won't always be as many as possible. As the majority of respondents have indicated a 1,000 limit is appropriate, it will be implemented. |

6. Issues Paper - Costs (Section 5.7)

| Reference No | Question No | Respondent Name | Comments | IEC Response |
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| Question 11: Does your organisation have any concerns about the cost or business risk associated with the above changes? If so, please specify which change in particular concerns your organisation and why. | | | | |
| 1 | 11 | AGL | AGL notes the issues of timing of these changes, but is also aware that there may be no other windows for some years. | The IEC notes the respondent's comment. |
| 2 | 11 | AusNet Services | No. | The IEC notes the respondent's comment. |
| 3 | 11 | AUSGRID | No | The IEC notes the respondent's comment. |
| 4 | 11 | CitiPower Powercor | No | The IEC notes the respondent's comment. |
| 5 | 11 | Endeavour Energy | We are concern about the amount of changes proposed to occur at the same time. For example the 5MS and the NEM Customer Switching program are proposing a B2M schema change in December 2020. This places extra cost and risk on us to implement successfully and also having to deal with other participant who may not of successfully implemented their solution. | The IEC notes the respondent's comment. Given a majority of respondents indicated a preference for a November 2021 implementation, the clash with December 2020 changes is unlikely. |
| 6 | 11 | Evoenergy | There are a number of changes coming into effect over the next 2 years and in smaller organisations this often calls on the | The IEC notes the respondent's comment. The efficiency gains from the proposed changes will result in |

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| | | | same resources. Also, these changes were not budgeted when seeking the relevant regulated approvals from the AER. | a cost reduction for organisations of all sizes. |
| 7 | 11 | MEA Powershop | These changes in isolation are practical and comparatively cost-effective. Nevertheless Powershop is generally concerned around the number of market/regulatory related development changes that have been placed on industry over the last few years, particularly the significant cost burdens they place on customers (e.g. increased AEMO fees and significant development costs being worn by industry) and its stifling of innovation as a result of minimal development availability to work on customer-focused changes. | The IEC notes the respondent's comment. The efficiency gains from the proposed changes will result in a cost reduction for organisations of all sizes. |
| 8 | 11 | PLUS ES | PLUS ES has provided feedback against the fields. As per above comments. | The IEC notes the respondent's comment and refer to responses to the PLUS ES feedback. |
| 9 | 11 | Red Energy and Lumo Energy | Costs and business risk will be dependent on whether and when industry decides to implement the change. | The IEC notes the respondent's comment. |
| 10 | 11 | SA Power Networks | Yes – our concerns are linked to implementation timeframes – see response to Q13 (6.1). | The IEC notes the respondent's comment and refer to the response to Table 7, Item 11. |
| 11 | 11 | Simply Energy | No risks as such, however the cost of implementation is not yet fully determined. Provided the benefits will outweigh the cost, we support the changes. | The IEC notes the respondent's comment. |
| 12 | 11 | TasNetworks | Yes, whilst TasNetworks acknowledge that the proposed changes may assist improvement with some participants communications, there is still cost and effort to be incurred by | The IEC notes the respondent's comment. |

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| | | | <p>other participants that may have no benefit (or need) from the proposed changes as a result of a schema change.</p> <p>There is additional cost and risk should a schema change be required to be scoped, tested, and implemented into production prior to, and independently from the 5ms and GS changes being implemented. Risks may be incurred by the respective participant businesses as well as by software vendors who need to facilitate these changes for participants. This may impact on participant timings for 5ms/GS readiness activities and preparedness.</p> | |
| 13 | 11 | United Energy | No | The IEC notes the respondent's comment. |
| 14 | 11 | Vector Metering | No – These changes are urgently needed to help resolve inefficiencies for Retailers and contestable metering providers that are caused by the inadequacy to the current B2B transactions. While this consultation includes changes that alter the structure of existing B2B transactions, these changes have been designed to minimise impact on participants who choose not to use these. This is achieved by making all new fields optional, and by purposely not prescribing a process around their use so that participants can agree to take advantage of these new fields as they see fit. | The IEC notes the respondent's comment. |
| Question 12: If your organisation raised concerns in the above question, what alternative less-costly solutions might meet the requirements for the changes outlined in section 5? | | | | |
| 15 | 12 | AGL | None provided | The IEC notes the respondent's comment. |
| 16 | 12 | AusNet Services | N/A | The IEC notes the respondent's comment. |

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| 17 | 12 | Endeavour Energy | We believe that delaying this change can help to mitigate the concerns and risks highlighted above. | The IEC notes the respondent's comment. |
| 18 | 12 | Evoenergy | Wait until there is another market change which has schema changes and bundles the changes together. | The IEC notes the respondent's comment. The v3.4 change is the first B2B schema change since 1 February 2019 which focused on life support and reflects a bundling of changes for other B2B transactions not changed since 1 December 2017. |
| 19 | 12 | MEA Powershop | N/A. | The IEC notes the respondent's comment. |
| 20 | 12 | PLUS ES | PLUS ES already has workaround processes in place which deliver a lot of the efficiencies of the proposed changes, not without challenges. We also understand overall the changes will deliver process efficiencies. | The IEC notes the respondent's comment. |
| 21 | 12 | SA Power Networks | NA | The IEC notes the respondent's comment. |
| 22 | 12 | Simply Energy | Bilateral or bespoke solutions, which is beyond the scope of B2B Procedures anyway. | The IEC notes the respondent's comment. |
| 23 | 12 | TasNetworks | Investigate utilisation of the Peer-to-Peer transaction for the fields proposed to be added to the Service Order Process. Use the SpecialInstructions field to communicate NCONUML classification required. Modify the MXN csv transaction content, rather than the MFIN, assuming a schema change is not required. Else, evaluate the | The IEC notes the respondent's comment and refer to the responses to TasNetworks in other tables. |

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| | | | impact of continuing the existing process as is without having the SO ID provided. The Peer-to-Peer transaction may also be an alternative to be used for this purpose. | |
| 24 | 12 | Vector Metering | Not applicable | The IEC notes the respondent's comment. |

7. Issues Paper - Consultation timeframes (Section 6.1)

| Reference No | Question No | Respondent Name | Comments | IEC Response |
|--|-------------|--------------------|---|--|
| Question 13: If one or more of the changes proposed in this document were to be adopted, would your organisation prefer an implementation date of 2 December 2020 or November 2021? | | | | |
| 1 | 13 | AGL | Nov 2021 may be less risky as the majority of 5ms Global changes should be implemented. However, there are other work programs arising which may further delay these changes, and AGL does not consider that industry efficiency improvements should be indefinitely placed on hold due to imposed changes. | The IEC notes the respondent's support for a November 2021 implementation. |
| 2 | 13 | AusNet Services | AusNet Services would prefer an implementation of November 2021. | The IEC notes the respondent's support for a November 2021 implementation. |
| 3 | 13 | AUSGRID | November 2021 | The IEC notes the respondent's support for a November 2021 implementation. |
| 4 | 13 | CitiPower Powercor | CitiPower Powercor strongly recommends a later than November 2021, ideally after February 2022, timeframe for introduction of these changes. Key reasons behind this position include: <ul style="list-style-type: none"> There are many industry changes (including the 5MS & GS program) that need to implement over the next 18 - 24 months, adding this package of changes, increases complexity | The IEC notes the respondent's comment. At this stage, a majority of respondents support a November 2021 implementation. |

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| | | | <p>and risk as these changes have a proposed earlier go live date.</p> <ul style="list-style-type: none"> The proposed B2B changes to NCONUML do not take affect till July 2021 so it would be more logical to introduce this package of changes after then. | |
| 5 | 13 | Endeavour Energy | We would prefer November 2021 for the reasons highlighted above. | The IEC notes the respondent's support for a November 2021 implementation. |
| 6 | 13 | Ergon Energy and Energex | Of the options presented, we suggest 2 December 2020 is the preferred option, so that it can be implemented together with or prior to 5MGS changes. November 2021 would be too late and would result in rework being required. | The IEC notes the respondent's comment. At this stage, a majority of respondents support a November 2021 implementation. |
| 7 | 13 | Evoenergy | November 2021 | The IEC notes the respondent's support for a November 2021 implementation. |
| 8 | 13 | MEA Powershop | Powershop is supportive of all the changes in this document and would prefer a go-live date of November 2021. | The IEC notes the respondent's support for a November 2021 implementation. |
| 9 | 13 | PLUS ES | PLUS ES would prefer Nov 2021 or later. | The IEC notes the respondent's support for a November 2021 implementation. |

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| 10 | 13 | Red Energy and Lumo Energy | Red and Lumo would support an implementation date that aligns with other electricity schema changes. | The IEC notes the respondent's comment. At this stage, a majority of respondents support a November 2021 implementation. |
| 11 | 13 | SA Power Networks | <p>SA Power Networks does not support an implementation date ahead of November 2021.</p> <p>We appreciate the majority of proposed changes are within the competitive metering area, it is unclear to SA Power Networks if all participants that operate within this space will adopt the changes and whether these changes provide true benefits that would warrant this work being implemented ahead of the significant industry changes (5MS/GS) that are already underway.</p> <p>We have a significant internal program of work underway and the proposed changes will add complexity and risk to a successful implementation that could be avoided by targeting an effective date of November 2021 or after.</p> | The IEC notes the respondent's comment and support for a November 2021 or later implementation. |
| 12 | 13 | Simply Energy | 2 Dec 2020, in conjunction with Reduced Customer Switching Timeframes changes. | The IEC notes the respondent's comment. At this stage, a majority of respondents support a November 2021 implementation. |
| 13 | 13 | TasNetworks | TasNetworks strong preference would be for an implementation date of November 2021. | The IEC notes the respondent's support for a November 2021 implementation. |

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| 14 | 13 | United Energy | <p>United Energy strongly recommends a later than November 2021, ideally after February 2022, timeframe for introduction of these changes. Key reasons behind this position include:</p> <ul style="list-style-type: none"> • There are many industry changes (including the 5MS & GS program) that need to implement over the next 18 - 24 months, adding this package of changes, increases complexity and risk as these changes have a proposed earlier go live date. • The proposed B2B changes to NCONUML do not take affect till July 2021 so it would be more logical to introduce this package of changes after then. | <p>The IEC notes the respondent's comment. At this stage, a majority of respondents support a November 2021 implementation.</p> |
| 15 | 13 | Vector Metering | <p>2 December 2020. Vector accepts that industry currently has a number of change programs underway which require resourcing, however we note that the only industry change with <u>firm</u> requirements is the 5 Minute and Global settlement program and these changes have a scheduled go-live date of July 2021 and February 2022 respectively. All other changes are either early in the Rules consultation, have not had implementation dates set or, given the information available will not have any impact on B2B. This consultation represent the first efficiency change implemented in the three years since POC go-live. A further deferral until November 2021 would represent an unacceptable delay imposed upon the contestable metering providers who are currently working with processes that are difficult to automate and are error prone, under a more stringent regulatory framework than that was in place at the commencement of POC. Vector does not see a case for delaying this consultation past December 2020. Vector notes that the deployment program for 2021 and 2022 already has changes scheduled (5MS and Global Settlements go-lives) and believe that a November 2021 date is likely to be more disruptive than December 2020.</p> | <p>The IEC notes the respondent's comment. At this stage, a majority of respondents support a November 2021 implementation.</p> |

8. Issues Paper - New Verify Standing Data Transaction (Section 6.2)

| Reference No | Question No | Respondent Name | Comments | IEC Response |
|---|-------------|--------------------|--|--|
| Question 14: Do you see value in the development of new Verify Standing Data Transactions? | | | | |
| 1 | 14 | AGL | AGL does not support this transaction at this time, noting that AEMO recently has recommenced the review of NMI standing Data. | The IEC notes the respondent's comment. |
| 2 | 14 | AusNet Services | No. | The IEC notes the respondent's comment. |
| 3 | 14 | AUSGRID | YES | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 4 | 14 | CitiPower Powercor | No at this stage | The IEC notes the respondent's comment. |
| 5 | 14 | Endeavour Energy | Yes, we see value in developing new Verify Standing Data transactions. | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data |

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| | | | | Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 6 | 14 | Evoenergy | No | The IEC notes the respondent's comment. |
| 7 | 14 | MEA Powershop | Notionally Powershop do see value in the development of new Verify Standing Data Transactions. However, we encourage AEMO to provide an extensive implementation and go-live timeframe because of the unprecedented and continuous development work and cost being imposed on industry and customers. | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 8 | 14 | Red Energy and Lumo Energy | No. Red and Lumo do not see any value in the development of new Verify Standing Data transactions, unless there is an obligation in place to investigate and update the information in question. | The IEC notes the respondent's comment. |
| 9 | 14 | SA Power Networks | No | The IEC notes the respondent's comment. |
| 10 | 14 | Simply Energy | No | The IEC notes the respondent's comment. |
| 11 | 14 | TasNetworks | No | The IEC notes the respondent's comment. |
| 12 | 14 | United Energy | No at this stage | The IEC notes the respondent's comment. |

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| 13 | 14 | Vector Metering | Not for contestable metering providers. | The IEC notes the respondent's comment. |
| <p>If "No":</p> <p>Question 15: Please provide reasons why you do not see value in the development of a new Verify Standing Data transaction.</p> | | | | |
| 14 | 15 | AGL | AGL does not support this transaction at this time, noting that AEMO recently has recommenced the review of NMI standing Data. If the NMI standing data program was to take too long or stop again, then the value of this transaction gains value again. | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 15 | 15 | AusNet Services | <p>AusNet Services does not support the development of the Verify Standing Data Transaction without proper impact analysis being performed. What types of standing data would be queried? What are the expected volumes? What are the SLA's?</p> <p>Verification of standing would require manual investigation and possible field visits, which would increase operational costs and result in higher bills for customers. Respondents may charge requesters field visit fees. We request a cost/benefit analysis across the industry been performed.</p> | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 16 | 15 | CitiPower Powercor | <p>Key reasons for this position include:</p> <ul style="list-style-type: none"> We don't believe the timing is right and would rather the NMI Standing Data review takes place first, followed up by implementation of associated changes. | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data |

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| | | | <ul style="list-style-type: none"> Following the introduction of these changes, we would then support a review into whether a Verify Standing Data transaction was required. The design would also need to cater for the many possible permutations to reduce follow up emails if the appropriate response is not received. | Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 17 | 15 | Endeavour Energy | N/A | The IEC notes the respondent's comment. |
| 18 | 15 | Evoenergy | Should bundle this into the Standing Data Review | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 19 | 15 | Red Energy and Lumo Energy | As above | The IEC notes the respondent's comment and refers to the response to Table 8, Item 8. |
| 20 | 15 | SA Power Networks | Changes and requirements in this area should not be considered until the NMI Standing Review takes place and associated changes/improvements are determined and implemented. Following the introduction of any changes, we would then support a review into whether a Verify Standing Data transaction was required. (Noting that the design would need to cater for the many and varied interactions that occur | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of |

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| | | | today to resolve any issues – this is not a simple request and response transaction). | the MSATS Standing Data Review. |
| 21 | 15 | Simply Energy | After carefully reviewing the changes, we understand that MSATS Standing Data Review (MSDR) might have overlaps on this proposal. We suggest deferring the VSD transaction once MSDR is finalised. | The IEC notes the respondent’s comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 22 | 15 | TasNetworks | <p>TasNetworks do not consider the benefit potentially to be realised from the implementation of these new transactions would outweigh the cost and effort of participants undertaking works to implement the transaction. We further believe that the use cases for such a transaction may be many and varied, which may be better suited to email communications, which can also be directed to multiple parties collectively. There is potential that these new transactions may not be widely adopted by participants.</p> <p>The content that would possibly need to be included in such transactions would need to be generic and free text in nature to explain what is required, therefore would be difficult to build automated processes from it. The main benefit would be to track message delivery, lifecycle management, and timings.</p> <p>Over time new scenarios may arise that may not fit with the proposed transaction field values and thus require the use of an email anyway.</p> | The IEC notes the respondent’s comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 23 | 15 | United Energy | Key reasons for this position include: | The IEC notes the respondent’s comment. At this |

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| | | | <ul style="list-style-type: none"> We don't believe the timing is right and would rather the NMI Standing Data review takes place first, followed up by implementation of associated changes. Following the introduction of these changes, we would then support a review into whether a Verify Standing Data transaction was required. The design would also need to cater for the many possible permutations to reduce follow up emails if the appropriate response is not received. | <p>stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review.</p> |
| 24 | 15 | Vector Metering | <ul style="list-style-type: none"> The issues raised in the description in the proposed transaction appear related to standing data that the network is responsible for. If retailers and Networks agree that this is necessary then this is fine but not for contestable MP's and MDP's; Issues related to standing data are usually complex in nature and cannot be convey without direct engagement between businesses; | <p>The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review.</p> |
| <p>If "Yes":</p> <p>Question 16: What areas of Standing Data are causing you issues today (please list individually)?</p> | | | | |
| 25 | 16 | AGL | <p>For example Shared Supply Points, Number of Phases, CT metering indicator, Controlled Load owner (DB or MP)</p> <p>See AGL response to the NMI Standing Data pre-consultation review for more details.</p> | <p>The IEC notes the respondent's comment. These areas will be considered as part of the MSATS Standing Data Review.</p> |

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| 26 | 16 | AusNet Services | AusNet Services is experiencing issues with unstructured addresses – however this should be resolved as part of the MSDR consultation. | The IEC notes the respondent’s comment. This will be considered as part of the MSATS Standing Data Review. |
| 27 | 16 | AUSGRID | Location data | The IEC notes the respondent’s comment. Location data is being considered as part of the MSATS Standing Data Review. |
| 28 | 16 | Endeavour Energy | <p>Enquiries related to NMI standing data</p> <ul style="list-style-type: none"> • Enquiries related to the site address • Enquiries related to NMI standing data such as NMI Class, Customer Threshold Code and NMI status <p>Enquiries related to meter standing data</p> <ul style="list-style-type: none"> • Enquiries related to when a was meter installed and how it was configured • Enquiries related to meter standing data such as register and suffixes and meter status • Enquiries related to meter faults | The IEC notes the respondent’s comment. These areas will be considered as part of the MSATS Standing Data Review. |
| 29 | 16 | Evoenergy | Meter register and register identifier mismatch with MDFF data; NMI status and Data stream status | The IEC notes the respondent’s comment. These areas will be considered as part of the MSATS Standing Data Review. |

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| 30 | 16 | Simply Energy | N/A | The IEC notes the respondent's comment. |
| 31 | 16 | TasNetworks | N/A | The IEC notes the respondent's comment. |
| 32 | 16 | Vector Metering | <ul style="list-style-type: none"> There is a need for AEMO to provide an education piece for retailers about which roles are responsible for which elements of standing data. Today MP's and MDP's receive requests about incorrect standing data which we do not have any responsibility for. This is the bulk of the communications we receive about correcting standing data. | The IEC notes the respondent's comment. This will be considered as part of the MSATS Standing Data Review. |
| Question 17: Who is involved in the interactions to resolve the issue (e.g. Retailer to Distributor – please list and link to each data item from Question 14)? | | | | |
| 33 | 17 | AGL | RB to DB, MC to DB. | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 34 | 17 | AusNet Services | No comment. | The IEC notes the respondent's comment. |
| 35 | 17 | AUSGRID | Verify Standing Data Request: <ul style="list-style-type: none"> Tariff mismatch - Retailer to Distributor Address updates - Retailer to Distributor | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support |

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| | | | <ul style="list-style-type: none"> • NMI abolishment - Retailer to Distributor • NMI status mismatch - Retailer to Distributor • Meter status mismatch - Retailer to MDP/MC <p>Verify Standing Data Response:</p> <ul style="list-style-type: none"> • Tariff mismatch - Distributor to Retailer • Address updates - Distributor to Retailer • NMI abolishment - Distributor to Retailer • NMI status mismatch - Distributor to Retailer • Meter status mismatch - MDP/MC to Retailer | <p>this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review.</p> |
| 36 | 17 | Endeavour Energy | <p>Retailer to Distributor: Enquiries related to NMI standing data</p> <p>Retailer to Metering Provider: Enquiries related to meter standing data</p> <p>Distributor to Metering Provider: Enquiries related to meter standing data</p> | <p>The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review.</p> |
| 37 | 17 | Evoenergy | MPB, LNSP, MDP | <p>The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of</p> |

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| | | | | the MSATS Standing Data Review. |
| 38 | 17 | Simply Energy | N/A | The IEC notes the respondent's comment. |
| 39 | 17 | TasNetworks | N/A | The IEC notes the respondent's comment. |
| 40 | 17 | Vector Metering | Not applicable | The IEC notes the respondent's comment. |
| Question 18: What are the volumes of each type of Standing Data item (please list and link to each data item from Question 14)? | | | | |
| 41 | 18 | AGL | Data not captured due to lack of time, but significant enough. | The IEC notes the respondent's comment. |
| 42 | 18 | AusNet Services | No comment. | The IEC notes the respondent's comment. |
| 43 | 18 | AUSGRID | <ul style="list-style-type: none"> • Tariff mismatch – 18 requests per month (majority being solar related) • Address updates - 15 requests per month • NMI abolishment – 124 requests per month • NMI status mismatch – 9 requests per month • Meter status mismatch - Retailer to MDP/MC NFA for ENERGYAP | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 44 | 18 | Endeavour Energy | Retailer to Distributor: Enquiries related to NMI standing data – approximately 10 per month | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support |

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| | | | Retailer to Metering Provider: Enquiries related to meter standing data – approximately 10 per month Distributor to Metering Provider: Enquiries related to meter standing data – approximately 150 per month | this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 45 | 18 | Evoenergy | Unknown as number of emails received about standing data not measured | The IEC notes the respondent's comment. |
| 46 | 18 | Simply Energy | N/A | The IEC notes the respondent's comment. |
| 47 | 18 | TasNetworks | N/A | The IEC notes the respondent's comment. |
| 48 | 18 | Vector Metering | Not applicable | The IEC notes the respondent's comment. |
| Question 19: To resolve the issue, is there a need for multiple interactions between parties to gain a full understanding of the issue and agree the resolution (please list and link to each data item from Question 14)? | | | | |
| 49 | 19 | AGL | AGL believes that the NMI standing data review may resolve this question. | The IEC notes the respondent's comment. |
| 50 | 19 | AusNet Services | No comment. | The IEC notes the respondent's comment. |
| 51 | 19 | AUSGRID | <ul style="list-style-type: none"> • Tariff mismatch – Council rates notice required • Address updates - Retailer to Distributor - Council rates notice required • NMI abolishment - Retailer to Distributor – NIL • NMI status mismatch - Retailer to Distributor – NIL | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, |

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| | | | <ul style="list-style-type: none"> Meter status mismatch - Retailer to MDP/MC NFA for ENERGYAP | dependent on the outcomes of the MSATS Standing Data Review. |
| 52 | 19 | Endeavour Energy | We believe that the Verify Standing Data should operate in a similar manner to the Verify Meter Data with a request and response transaction | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 53 | 19 | Evoenergy | Need to clarify each field so that each participants expectation of what to build to and send is not disputable. Examples: MDFF meter serial number must match meter serial ID; UOM in MDFF and MSATS should be same; controlled load values defined as Yes or No for basics (NTC will define controlled load type and times, other defined values for COMMS; define time of day | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 54 | 19 | Simply Energy | N/A | The IEC notes the respondent's comment. |
| 55 | 19 | TasNetworks | N/A | The IEC notes the respondent's comment. |
| 56 | 19 | Vector Metering | Not applicable | The IEC notes the respondent's comment. |

| Question 20: If pursued, which B2B Procedure should these new transactions be included within? | | | | |
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| 57 | 20 | AGL | May be resolved with updates to MSATS. | The IEC notes the respondent's comment. |
| 58 | 20 | AusNet Services | No comment. | The IEC notes the respondent's comment. |
| 59 | 20 | AUSGRID | Either the B2B Procedure Service Order Process or B2B Procedure Meter Data Process | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 60 | 20 | Endeavour Energy | We believe that the Verify Standing Data should be included in the Meter Data Procedure with the procedure rename to a more appropriate name like 'Meter Data, Metering and Standing Data Procedure' | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 61 | 20 | Evoenergy | In a new standalone procedure as it has a different purpose to other transactions | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support |

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| | | | | this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 62 | 20 | Simply Energy | N/A | The IEC notes the respondent's comment. |
| 63 | 20 | TasNetworks | One Way Notification Process | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 64 | 20 | Vector Metering | Not applicable | The IEC notes the respondent's comment. |
| Question 21: Do you have any further information/thoughts that would be relevant to this topic (please provide)? | | | | |
| 65 | 21 | AGL | AGL believes that the NMI standing data review may resolve this question. | The IEC notes the respondent's comment. |
| 66 | 21 | AusNet Services | No comment. | The IEC notes the respondent's comment. |
| 67 | 21 | AUSGRID | <ul style="list-style-type: none"> A review of the 'ownership' of the life support flag will need to be completed before attempting to attach this | The IEC notes the respondent's comment. |

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| | | | <p>information to the standing data; the current multi-owners of the flag will not work (ie within MSATS).</p> <ul style="list-style-type: none"> Customer portal for standing data may not work, there have been many cases where customers believe they live at one address however the council have changed address post the complete build date of a property eg, duplexes. Any request to change location data must be accompanied by a rates notice. | |
| 68 | 21 | Endeavour Energy | We believe that the Verify Standing Data should be included in a new and separate Transaction Group to help distinguish this from other transactions | The IEC notes the respondent's comment. At this stage, a majority of respondents do not support this transaction at this time. The Verify Standing Data Transaction may be revisited, dependent on the outcomes of the MSATS Standing Data Review. |
| 69 | 21 | Evoenergy | The introduction of a VSDRs is not addressing the root cause of the data discrepancy issue, which appears to be different interpretations of the procedures and meaning of standing data. | The IEC notes the respondent's comment. |
| 70 | 21 | Simply Energy | As per our response in Q15 | The IEC notes the respondent's comment. |
| 71 | 21 | TasNetworks | No | The IEC notes the respondent's comment. |
| 72 | 21 | Vector Metering | No; | The IEC notes the respondent's comment. |

9. Customer and Site Details Process

| Reference No | Respondent Name | Old Clause No | New Clause No | Comments | IEC Response |
|--------------|--------------------------|---------------|-----------------|---|--|
| 1 | Ergon Energy and Energex | | | No comments on all proposed changes. | The IEC notes the respondent's comment. |
| 2 | IntelliHUB | | | N/A | The IEC notes the respondent's comment. |
| 3 | Origin Energy | | General Comment | Origin Energy understands that it's implied that NCONUML's will transact for B2B in a similar manner to any other metering type (in the same way a type 7 does). For avoidance of doubt does this need to be explicitly specified in B2B procedures i.e. ability to send different transactions such as CDN's, CDR's etc? | The IEC notes that NCONUML will be NMI based. The B2B Procedures are silent on meter types for usage of existing transactions, that is, it is not restricted. Transactions are available for all NMIs. |

10. Service Order Process

| Reference No | Respondent Name | Old Clause No | New Clause No | Comments | IEC Response |
|--------------|--------------------------|---------------|---------------|--------------------------------------|---|
| 1 | Ergon Energy and Energex | | | No comments on all proposed changes. | The IEC notes the respondent's comment. |

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| 2 | IntelliHUB | | | N/A | The IEC notes the respondent's comment. |
| 3 | PLUS ES | Version Release History - 3.4 | | The updates to the service orders have not been defined in the Comments field | The IEC notes the respondent's comment. The Comments field has been updated to reflect the service order changes. |
| 4 | AGL | 2.1 Table 3 | | AGL Supports the change for NSW Supply Abolishment | The IEC notes the respondent's support for the NSW Supply Abolishment changes. |
| 5 | AusNet Services | 2.2.1 | 2.2.1 | Table 3 Service Order Types and Subtypes As the additional text for NSW pertains to MSATS Standing Data activities only, can this text be moved underneath the text for | The IEC agrees with the comment and has |

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| | | | | the other jurisdictions where the physical process is impacted? | updated accordingly. |
| 6 | AUSGRID | | 2.1 | Supply Service Works / Supply Abolishment – AUSGRID strongly supports the introduction of Supply Abolishment within NSW. This will help streamline the process of NMI extinction. | The IEC notes the respondent's support for the NSW Supply Abolishment changes. |
| 7 | AUSGRID | | 2.1 | Escalation indicator – Ausgrid does not support an additional field. Special instructions is a mandatory field where the initiator wishes to convey to the Recipient | The IEC notes the respondent's comment. The majority of respondents did not object to the escalation field. |
| 8 | Evoenergy | 2.1 Table 3 Supply Service Works – Supply Abolishment | | Need to add to the Description further words for the ACT jurisdiction, and reword entire Description. "In the ACT, this Service Order Sub Type is not used. Paperwork is required to be submitted directly by the Customer or the Customers Representative to the DNSP to remove the service line/cable. In NSW, this Service Order Sub Type is used by the DNSP to make the NMI status | The IEC notes the respondent's comment and will change the description accordingly. |

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| | | | | <p>Extinct in MSATS, as the service line/cable has been confirmed as already removed.</p> <p>In other jurisdictions, this Service Order Sub Type is used by the DNSP to remove the service line/cable as supply is no longer required at the premises. This involves decommissioning a NMI.”</p> <p>In the Description of use, need to add the following words to make sure that the service line/cable is/will be removed and Initiator is clear on end result. Add into first sentence: “For example, where the proposed/actioned removal of the service line/cable is confirmed with the Initiator for a demolition...”</p> | |
| 9 | Origin Energy | | 2.1 Table 3 | <p>Origin Energy support the use of the B2B Supply Abolishment Service Order however seek clarification on the following:</p> <ul style="list-style-type: none"> • Will this process be adopted across all three NSW Networks? • What evidence will the Network require? <p>Will the closure of the SSW be dependent on the NOMW or NOSW?</p> | <p>The IEC notes the respondent’s support for the NSW Supply Abolishment changes. The IEC confirms this will be adopted across all three NSW Networks</p> |

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| | | | | | and no additional evidence will be required as retailers are expected to have performed their due diligence prior to the use of the SSW. The closure of the SSW will be once the SSW is completed. For further detail, retailers should refer to each Network's retailer handbook |
| 10 | Tango Energy | Table 3 Service Order Types and Sub Types | Table 3 Service Order Types and Sub Types | Suggest the following rewording – In NSW, the DNSP is requested to make the NMI extinct in MSATS as the service line / cable has been confirmed to be already removed. | The IEC notes the respondent's comment and will change the |

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| | | | | <p>In all other jurisdictions, the DNSP is requested to remove the service line/cable as <i>supply</i> is no longer required at Site.</p> <p>This involves decommissioning a site.</p> | description accordingly. |
| 11 | Evoenergy | 3.3.3 Table 12 Re-energisation (a) | | In (a) should this read "...within 1 or 2 for business days... | The IEC notes the respondent's comment and will change the description accordingly. |
| 12 | Simply Energy | Section 4 | Section 4 | Newly added key with "AO = Agreement Only (May be provided with agreement of the Recipient. If provided without agreement may be ignored)" is not warranted. Suggest we keep this as 'O = Optional (may be provided and should be used by the Recipient if provided)' as it covers the overarching principle of agreement, being a part of B2B Procedures. | The IEC notes the respondent's comment and will remove the proposed AO. |
| 13 | AGL | 4.1 Reg Classification | | AGL supports this Change as it will assist in more efficient processing | The IEC notes the respondent's comment. |
| 14 | AGL | 4.1 Purpose | | AGL believes that this data is available to the recipient via SpecialNotes | The IEC notes the respondent's comment |

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| | | | | | and refer to the response to Table 1, Item 13. |
| 15 | AGL | 4.1 CustomerDate | | AGL believes that this data is available to the recipient via SpecialNotes | The IEC notes the respondent's comment and refer to the response to Table 1, Item 13. |
| 16 | AGL | 4.1 Custagreedate | | AGL believes that this data is available to the recipient via SpecialNotes | The IEC notes the respondent's comment and refer to the response to Table 1, Item 13. |
| 17 | AGL | 4.1CustNotifMethod | | AGL believes that this data is available to the recipient via SpecialNotes | The IEC notes the respondent's comment and refer to the response to |

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| | | | | | Table 1, Item 13. |
| 18 | AGL | 4.1CustNotifAdd | | AGL does not support this as it can be done via CDR/CDN | The IEC notes the respondent's comment and refer to the response to Table 1, Item 13. |
| 19 | AGL | 4.1CustNotife-mail | | AGL believes that this data is available to the recipient via SpecialNotes | The IEC notes the respondent's comment and refer to the response to Table 1, Item 13. |
| 20 | AGL | 4.1Escalation | | AGL believes that this data is available to the recipient via SpecialNotes | The IEC notes the respondent's comment and refer to the response to Table 1, Item 13. |
| 21 | AGL | 4.1Exemption | | AGL believes that this data is available to the recipient via SpecialNotes | The IEC notes the |

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| | | | | | respondent's comment and refer to the response to Table 1, Item 13. |
| 22 | AGL | 4.1NMICreation | | AGL notes that this can be done via Special Instructions | The IEC notes the respondent's comment and refer to the response to Table 1, Item 13. |
| 23 | AusNet Services | 4.1 | 4.1 | <p>Table 13 Transaction table</p> <p>New Field: <i>CustomerNotificationMethod</i></p> <p>Suggest this field be made enumerated for data consistency. The current format of 'VARCHAR (40)' suggests the field is free text which makes automation impossible.</p> | The IEC notes the respondent's comment. It is not currently possible to include an unversioned enumerated list in a B2B transaction. The IEC recommends that AusNet Services |

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| | | | | | submit an ICF for consideration of the enumerated fields. |
| 24 | AusNet Services | 4.1 | 4.1 | <p>Table 13 Transaction table New Field: <i>CustomerNotificationMethod</i> Why do 'Post' and 'Email' only have separate Fields and not also 'SMS' and 'Phone'? Re-iterating the telephone/SMS information would be just as useful as Address and Email.</p> | The IEC notes the respondent's comment. The Post and Email fields reflect customer preference and minimise crossover with the details available through the CDN. |
| 25 | AusNet Services | 4.1 | 4.1 | <p>Table 13 Transaction table New Field: <i>CustomerNotificationAddress</i> Suggest this field be made mandatory where 'Post' has been selected for 'CustomerNotificationMethod'.</p> | The IEC notes the respondent's comment. It is currently not possible to make a field mandatory dependent |

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| | | | | | on another field being selected. |
| 26 | AusNet Services | 4.1 | 4.1 | <p>Table 13 Transaction table New Field: <i>CustomerNotificationEmail</i> Suggest this field be made mandatory where 'E-mail' has been selected for 'CustomerNotificationMethod'.</p> | The IEC notes the respondent's comment. It is currently not possible to make a field mandatory dependent on another field being selected. |
| 27 | AusNet Services | 4.1 | 4.1 | <p>Table 13 Transaction table New Field: <i>Escalation</i> AusNet Services do not support the introduction of this field for the following reasons;</p> <ol style="list-style-type: none"> 1) The field has the potential to be misused by initiating parties to escalate work that is not critical or to meet their SLA's without considering the impact on the downstream processes. 2) There is no way for the recipient to validate whether the escalation is appropriate or not. 3) Where the escalation is not accepted by the recipient, how will | The IEC notes the respondent's comment. As B2B transactions are a bilateral agreement system, the usage of the new fields will need to be mutually agreed upon. |

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| | | | | <p>this be communicated to the initiator if the transaction cannot be rejected? E.g. An initiator has included an escalation of 'VIP' but the recipient has chosen to ignore the escalation as there is no agreement and has scheduled the work as per their standard SLA but cannot formally communicate this to the initiator (unless via email). This places an expectation from the initiator (and the customer) on the recipient to complete the work sooner than expected, without the recipient's agreement. This field seems to transfer the obligation of managing customer expectations from the initiator onto the recipient unjustly.</p> | |
| 28 | AusNet Services | 4.1 | 4.1 | <p>Table 13 Transaction table Updated Definition for '<i>CustomerType</i>' field: 'NCONUML' AusNet Services supports this change.</p> | The IEC notes the respondent's comment. |
| 29 | Endeavour Energy | | PurposeforVisit field in Table 13 | <p>This is shown as optional (O) for the Metering Service Works Move Meter service order type. We suggest that this be shown as Agreement Only (AO) which we believe was the intent for this new field.</p> | The IEC notes the respondent's comment and will propose an O/N option in the table and define |

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| | | | | | that N means 'Not Required for distribution networks'. |
| 30 | Endeavour Energy | | CustomerType field in Table 13 | We note adding a new value to an existing field with a list of allowable value requires a schema change. We request that AEMO considers how this schema change can be made such that in future any further changes to a list of allowable values can be updated without any further schema changes. | The IEC notes the respondent's comment. It is not currently possible to include an unversioned enumerated list in a B2B transaction. |
| 31 | Evoenergy | 4.1 Table 13 | Escalation | Need to reword last part of Definition as it is not clear. Reword to: Where "Other" is used, mandatory for <i>SpecialInstructions</i> to contain a code that is agreed between the Initiator and <i>Recipient</i> e.g. [PRIORITY=abc] | The IEC notes the respondent's comment and will change the description accordingly. It is currently not possible to make a field mandatory dependent on another |

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| | | | | | field being selected. |
| 32 | Origin Energy | | 4.1. Key | <p>Origin Energy do not support the inclusion of the new key 'Agreement Only' (AO).</p> <p>If participants choose not to use the proposed fields it is likely going to add unnecessary cost for the market (participants would have to build different processes per-participant as well as ways to validate the data).</p> <p>It also invalidates the purpose of the new fields as SMP provides all participants with the ability to create transactions with agreed fields. If new fields are introduced suggestion to make them "Optional" and populate as agreed to keep the "key" in line with the current market.</p> | The IEC notes the respondent's comment and will propose an O/N option in the table and define that N means 'Not Required for distribution networks'. |
| 33 | Origin Energy | | 4.1 Table 13 | <p><u>Origin Energy supports the introduction of the following fields:</u></p> <p>PurposeforVisit – this will allow Retailers to notify their MP that a meter install needs to be coordinated e.g. with BTS removal.</p> <p>Escalation – this field is beneficial as it will allow the meter provider to prioritise work where required.</p> <p><u>Origin Energy do not support the introduction of the following fields:</u></p> <p>Customer Notification / Customer Notification Address – The issuing of correspondence to the customer is with</p> | The IEC notes the respondent's comment. As B2B transactions are a bilateral agreement system, the usage of the new fields will need to be mutually |

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| | | | | <p>the Retailer and not the MP so this should be managed by the Retailer. The appropriate solution for the provision of this data should be via the CDR/CDN process and should be updated to allow for the sending of the transaction to nominated participants as this would ensure the customer data is being managed appropriately to all participants.</p> <p>Customer Agreed Date – These dates may not be captured while raising the service order and cannot be changed once the service order is in the market.</p> <p>Exemption Code – an exemption should only be granted if the MPB was unable to resolve, at which point the MPB would already know that the site is exempt.</p> <p>Suggestion to add in the enumerated list in the “PurposeforVisit” field.</p> | <p>agreed upon.</p> |
| 34 | Origin Energy | | 4.1 Table 13 | <p>Origin Energy support the addition of NCONUML to the “Customer Type” field. NCONUML is only referenced as an acronym in the B2B Service Order Procedures. Should be included in the AEMO Glossary of Terms, including the abbreviation “non-contestable unmetered load”.</p> | <p>The IEC notes the respondent’s comment. Metering Installation Type Codes are defined in the MSATS CATS Procedure. A reference note has</p> |

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| | | | | | been added to the B2B procedure. |
| 35 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | Key | <p>Introduction of AO = Agreement Only (May be provided with agreement of the Recipient. If provided without agreement may be ignored)</p> <p>PLUS ES proposes that the 'R' field would work just as well, with a few extra clarifications in its definition.</p> <p>Not all participants will build for the AO field as they do not build for the 'O' fields, negating the benefit of introducing this field and the cost involved.</p> | The IEC notes the respondent's comment and will propose an O/N option in the table and define that N means Not Required for distribution networks. |
| 36 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | General | <ul style="list-style-type: none"> • PLUS ES proposes that more time is allowed to review the matrix of the proposed new fields and the assigned status against the various service orders prior to the release of the 2nd stage consultation. • PLUS ES also proposes that the B2B Working Group considers the effectiveness of the 'Optional' status for any new B2B SO fields moving forward. The 'Required' status would meet the objective, where the 'Optional' Status is not generally built by a number of participants, hence restricting future opportunities to deliver process efficiencies. | The IEC notes the respondent's comment. The IEC will allow additional time for respondents to consider this draft determination. The IEC will propose an O/N option in the |

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| | | | | | table and define that N means Not Required for distribution networks. |
| 37 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | ReqClassification | <ul style="list-style-type: none"> PLUS ES suggests, in accordance to the definition of this proposed field, that some SSW service orders (TBD) would also impact the metering timeframes and it would drive operational efficiencies to make this field available for those service orders. i.e. meter installations requiring alteration to supply (Reference NER clause 7.8.10C (a)(2). Special Instructions should be Mandatory when 'Other' is selected. | The IEC notes the respondent's comment and note the scope of this consultation is on changes to the Metering Service Works fields. Additional fields to the SSW services orders is outside the scope of this consultation . It is |

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| | | | | | currently not possible to make a field mandatory dependent on another field being selected. The IEC recommends that PLUS ES submit an ICF for consideration of the suggested fields. |
| 38 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | Purpose for visit | <ul style="list-style-type: none"> • ‘Relocate existing meter’ enumeration - PLUS ES suggests this is superfluous and does not add value. If the predominant purpose is for the meter to be moved, then a MSW – Move Meter should be raised. Propose the MSW – Move Meter to be ‘N’ and any additional information could be captured by Special Instructions. • Special Instructions should be Mandatory when ‘Other’ is selected. | The IEC notes the respondent’s comment. However, the majority of respondents didn’t object to this enumeration. |
| 39 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | CustomerAgreedStart Date | <ul style="list-style-type: none"> • Whilst the intent of the field is understood and required – there are existing fields: <ul style="list-style-type: none"> ○ ScheduledDate | The IEC notes the respondent’s comment. |

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| | | | | <ul style="list-style-type: none"> ○ AppointmentReference ○ CustomerPreferredDateAndTime <p>which need to be considered so there is no duplication and confusion with fields to be used.</p> <p>PLUS ES proposes the following:</p> <ul style="list-style-type: none"> • the requirement could be met by the above fields, with perhaps an amendment of the status against each service order i.e. 'R' instead of 'O'. • A review of the service orders in the matrix and their assigned statuses. i.e. This requirement would add value to more than just the few service orders identified. i.e. all MSW service orders etc. | <p>As B2B transactions are a bilateral agreement system, the usage of the new fields will need to be mutually agreed upon..</p> |
| 40 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | CustomerAgreedEndate | <ul style="list-style-type: none"> • MSW – Remove Meter would also benefit from the availability of this field • <i>If customer has agreed to a fixed date the customer start date and end date will be the same.</i> <p>PLUS ES suggests this is equivalent to an appointment/customer agreed date. The existing fields in the B2B service order meet this requirement. If the existing fields are to be used, then this sentence should be removed. Please see PLUS ES comments for CustomerAgreedStartDate field.</p> <ul style="list-style-type: none"> • PLUS ES proposes all date or schedule date reference fields relating to the delivery date of the service | <p>The IEC notes the respondent's comment. As B2B transactions are a bilateral agreement system, the usage of the new fields will need to be mutually agreed upon.</p> |

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| | | | | works should be located together in the table. i.e. This field should be located near or adjacent the ScheduledDate field etc. | |
| 41 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | CustomerNotificationMethod | <ul style="list-style-type: none"> • PLUS ES suggests that this field would create more issues. What if the customer notification method does not align with the agreed processes? Does one reject the service order and create delays in the delivery of the metering installation? • If this field is to be retained, PLUS ES proposes: <ul style="list-style-type: none"> ○ Removing the 'Waiver' enumeration as ultimately the Metering Provider will know if an outage is required or they may be able to get an agreed date with the customer which will not require an outage notification to be sent to the customer. This would not be known to the initiator at the time the B2B service order was raised. ○ MSW – Install Control Load requires an outage; amend status from 'N' to 'R' | The IEC notes the respondent's comment. As B2B transactions are a bilateral agreement system, the usage of the new fields will need to be mutually agreed upon. |
| 42 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | CustomerNotificationAddress | <ul style="list-style-type: none"> • PLUS ES agrees this field delivers a process efficiency to parties concerned; irrespective if the CustomerNotificationMethod field is delivered or not. • Spelling error in the Definition field – purposes amend to purposes. | The IEC notes the respondent's support for this change and |

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| | | | | | will correct the spelling. |
| 43 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | CustomerNotificationEmail | <ul style="list-style-type: none"> • PLUS ES agrees this field delivers a process efficiency to parties concerned; irrespective if the CustomerNotificationMethod field is delivered or not. • Spelling error in the Definition field – puposes amend to purposes. | The IEC notes the respondent's support for this change and will correct the spelling. |
| 44 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | Escalation | <p>PLUS ES proposes the following:</p> <ul style="list-style-type: none"> • Renaming the field – the objective of this field is to identify prioritised service orders and 'Escalation' is more appropriate as an enumeration of the field rather than the name. Possibly renaming the field as Prioritisation. • Remove 'Normal' enumeration. This field should only be populated when required and the absence of any enumeration implies normal status. • 'VIP' enumeration – doubt the value this field would deliver. How does one monitor the VIP status so that it is not abused? • Include 'Escalation/Complaint' enumeration – complaint/escalation which has not been referred to the ombudsman • Special Instructions should be Mandatory when 'Other' is selected. | <p>The IEC notes the respondent's comment.</p> <p>The term Priority is used elsewhere in the B2B Procedures, Escalation will be used for this field to avoid confusion.</p> <p>The IEC will add an additional enumeration of 'Complaint'.</p> |

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| | | | | <ul style="list-style-type: none"> • This field should be made available to all MSWs and could also be applicable to other service order types as well. | <p>As B2B transactions are a bilateral agreement system, the usage of the new fields will need to be mutually agreed upon.</p> |
| 45 | PLUS ES | Section 4.1 ServiceOrderRequest Transaction Data | Exemption code | <ul style="list-style-type: none"> • PLUS ES recommends that this field is removed. What is the value of this field? Exemption codes in most cases would not be known at this stage by the initiator. • If the intent is to know that an exemption has been raised, then the B2B SO is not the place for this information. Perhaps a field in MSATS would better serve the intent. The MP is generally the participant who tells the MC that an exemption must be raised, even though this implies a particular process. | <p>The IEC notes the respondent's comment. The IEC notes AEMO is currently performing the MSATS Standing Data Review and the majority of respondents did not object to the inclusion of the field so</p> |

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| | | | | | it will remain. |
| 46 | Simply Energy | Section 4.1 | Section 4.1 | Supports all new fields except <i>PurposeforVisit</i> as this can be complex/difficult for training due to potential overlaps. Some of the suggested enumerations are an overlap that need to be addressed, e.g. relocate existing meter enumeration is same as 'move meter' subtype, new connection is same as new meter deployment, etc. Suggest we either remove this as a standalone field and merge it with other relevant fields where appropriate, e.g. RegClassification, etc. | The IEC notes the respondent's comment. The majority of respondents did not object to the inclusion of the field so it will remain. |
| 47 | Simply Energy | Section 4.1 | Section 4.1 | Two more reasons to be considered for visit: <ul style="list-style-type: none"> - Multi-occupancy - Battery/VPP connection | The IEC notes the respondent's comment. The existing solar enumeration will be rephrased to capture the metering requirement for generation at premises. The IEC notes that |

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| | | | | | multi-occupancy is not a purpose for a visit, instead it is a note about the premise's configuration. |
| 48 | Simply Energy | Section 4.1 and Section 2.8 | Section 4.1 and Section 2.8 | <p>While the new field 'Escalation indicator' is proposed to designate the level of escalation / urgency, it doesn't necessarily help if the 'Transaction Priority (as defined under High, Medium or Low in the Technical Delivery Specification), and as a fully tagged aseXML Transaction, this will be sent as Medium Priority regardless of the payload. Hence we suggest this needs to be reviewed and section 2.8 be amended to include the following:</p> <p>2.8. Delivery Priorities 'High Priority' ServiceOrderRequests are defined as</p> <p>(a) same day or next day Re-energisations or cancellations of same day Re-energisations or De-energisations. (b) where the 'Escalation' field of a Service Order Request is anything except Normal (default)</p> | The IEC notes that the Delivery Priority is different to the Escalation Indicator. The Delivery Priority relates to the time taken for the transaction to pass through the payload. The Escalation Indicator relates to |

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| | | | | | how a service provider may schedule their work. At this time the IEC will not be changing the Delivery Priorities. |
| 49 | Tango Energy | 4.1 ServiceOrderRequest Transaction Data | 4.1 ServiceOrderRequest Transaction Data | <p>RegClassification – Change ‘Use’ to ‘Used’</p> <p>PurposeForVisit - Change ‘Use’ to ‘Used’ and change the wording to: allowable values will be are provided in an enumerated list:</p> <p>CustomeAgreedStartDate - Suggest the following rewording: The earliest date for the provision of the service as agreed between the initiator and customer.</p> <p>CustomerAgreedEndDate - Suggest the following rewording: The last date for the provision of the service as agreed between the initiator and customer. Where the initiator and customer have agreed to a fixed date, the CustomeAgreedStartDate and</p> | The IEC notes the respondent’s comment and will change the description accordingly. |

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| | | | | <p>CustomerAgreedEndDate will be the same date.</p> <p>CustomerNotificationMethod - Suggest the following rewording: This is the method by which the notice of interruption to the customer is to be delivered. This is used when the recipient is to issue the notice on behalf of the initiator. Allowable values are:</p> <ul style="list-style-type: none"> • Post • E-mail • SMS • Waiver • Phone <p>Escalation - Suggest the following rewording: Used to indicate the Service Order is to be prioritised over other Service Orders. Initiator and Recipient must agree the circumstances and indicator to be used. Allowable values are:</p> <ul style="list-style-type: none"> • Normal (default) • Ombudsman • VIP • No Supply • Other <p>Where Other is used, Special instruction should contain a code that is agreed between the Initiator and recipient e.g. [PRIORITY=abc]</p> | |
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| | | | | <p>ExemptionCode – Suggest the following rewording:</p> <p>Used to communicate, to the MPB, the malfunction exemption code allocated to the MC by AEMO.</p> | |
| 50 | TasNetworks | | 4.1, Table 13 – RegClassification | <p>If 'other' is selected, is it intended that a participant needs to provide details in SpecialInstructions?</p> | <p>The IEC notes the respondent's comment. It is currently not possible to make a field mandatory dependent on another field being selected.</p> |
| 51 | TasNetworks | | 4.1, Table 13 – PurposeforVisit | <p>Marked as O (optional) for Move Meter, should be AO.</p> | <p>The IEC notes the respondent's comment and will propose an O/N option in the table and define that N means Not Required for</p> |

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| | | | | | distribution networks. |
| 52 | TasNetworks | | 4.1, Table 13 – PurposeforVisit | <p>Some of the values specified seem superfluous, for instance;</p> <p>‘Additional Meter’ could be implied from the SO Sub Type ‘Install Meter’</p> <p>‘Relocate existing meter’ could be implied from SO Sub Type ‘Move Meter’</p> <p>If ‘other’ is selected, is it intended that a participant needs to provide details in SpecialInstructions?</p> | <p>The IEC notes the respondent’s comment. The majority of respondents did not object to the inclusion of these fields so they will remain. It is currently not possible to make a field mandatory dependent on another field being selected.</p> |
| 53 | TasNetworks | | 4.1, Table 13 – CustomerNotificationAddress CustomerNotificationEmail | <p>These two pieces of information are duplicated from what can be provided via the CDR/CDN process. To ensure consistency and a single source of truth it is suggested that the CDR/CDN process should be the source of this information.</p> | <p>The IEC notes the respondent’s comment and notes that some customer’s use alternate addresses</p> |

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| | | | | | and emails for notification purposes and that emails are not always available for the CDN. |
| 54 | TasNetworks | | 4.1, Table 13 - CustomerType | TasNetworks recommend that this value could be provided in SpecialInstructions | The IEC notes the respondent's comment. The value will improve market outcomes and efficiency. |
| 55 | Vector Metering | Table 13 | | <p>Suggest Reg classification should be expanded to include 'Shared Fuse' as this is likely to have new timeframes introduced by the MC Planned Interruption rules consultation – e.g. 30 Business days;</p> <p><i>RegClassification</i> VARCHAR(40) Use to indicate whether it is customer Initiated and regulatory timeframes apply, or not.</p> <ul style="list-style-type: none"> • Customer Initiated | The IEC notes the respondent's comment and will change the transaction accordingly. |

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| | | | | <ul style="list-style-type: none"> • Malfunction • New Meter Deployment • Shared Fuse • Other | |
| 56 | Vector Metering | Table 13 | | <p>Suggest PurposeforVisit should include a 'replace existing metering' for completeness.</p> <p><i>PurposeforVisit</i> VARCHAR(40) Use to clearly indicate the purpose of visit – allowable values will be provided in an enumerated list:</p> <ul style="list-style-type: none"> • New connection, • Additional Meter, • Part of BTS Temp to Perm, • Part of supply alteration, • Solar Upgrade, • Relocate existing meter; • Replace existing metering; • Bypassed Customer • Other | The IEC notes the respondent's comment and will change the transaction accordingly. |
| 57 | AGL | 4.2 SO Response | | AGL does not support the concept of A/O as a SO response, as the logic processes | The IEC notes the |

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| | | | | required to manage this would be far too complex. | respondent's comment and will propose an O/N option in the table and define that N means Not Required for distribution networks. |
| 58 | Tango Energy | 4.2 ServiceOrderResponse Transaction Data | 4.2 ServiceOrderResponse Transaction Data | Remove AO = Agreement Only (May be provided with agreement of the Recipient. If provided without agreement may be ignored) as only M, R, O and N apply to data in the ServiceOrderResponse. | The IEC notes the respondent's comment and will propose an O/N option in the table and define that N means Not Required for distribution networks. |
| 59 | TasNetworks | | 4.2 - Key | AO does not need to be referenced in the 'Key' as there are no fields in the ServiceOrderResponse with this state | The IEC notes the respondent's comment and will propose an O/N option |

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| | | | | | in the table and define that N means Not Required for distribution networks. |
| 60 | Tango Energy | 4.3 BusinessAcceptance/Rejection Transaction Data | 4.3 BusinessAcceptance/Rejection Transaction Data | <p>Remove</p> <p>AO = Agreement Only (May be provided with agreement of the Recipient. If provided without agreement may be ignored)</p> <p>R = Required (if this information is available or has changed)</p> <p>N = Not relevant (not to be provided)</p> <p>as only M and O apply to data in the BusinessAcceptance/Rejection Transaction.</p> | The IEC notes the respondent's comment and will propose an O/N option in the table and define that N means Not Required for distribution networks. |
| 61 | TasNetworks | | 4.3 - Key | AO does not need to be referenced in the 'Key' as there are no fields in the BusinessAcceptance/Rejection with this state | The IEC notes the respondent's comment and will propose an O/N option in the table and define that N means Not Required for |

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| | | | | | distribution networks. |
| 62 | TasNetworks | | General | Consideration may need to be giving to any updates required to the B2B Guide as a consequence of modification to the Service Oder Process | The IEC notes the respondent's comment and will review the Guide. |

11. Meter Data Process

| Reference No | Respondent Name | Old Clause No | New Clause No | Comments | IEC Response |
|--------------|--------------------------|---------------|-------------------------------------|---|---|
| 1 | Ergon Energy and Energex | | | No comments on all proposed changes. | The IEC notes the respondent's comment. |
| 2 | IntelliHUB | | | N/A | The IEC notes the respondent's comment. |
| 3 | Origin Energy | | Meter Data Procedures 2.4.3(a)(iii) | Origin Energy suggest amending this clause to include provision for NCONUML as follows: The Seventh Business Day of the calendar month for the previous month's MDFF data, for Controlled Unmetered Devices "and Non Contestable Unmetered loads" . | The IEC notes the respondent's comment. The Meter Data Process has been updated to 'Unmetered loads'. |

12. One Way Notification Process

| Reference No | Respondent Name | Old Clause No | New Clause No | Comments | IEC Response |
|--------------|--------------------------|---------------|-----------------------------|---|---|
| 1 | Ergon Energy and Energex | | | No comments on all proposed changes. | The IEC notes the respondent's comment. |
| 2 | IntelliHUB | | | N/A | The IEC notes the respondent's comment. |
| 3 | Tango Energy | | | No Comment | The IEC notes the respondent's comment. |
| 4 | AGL | | | AGL is not in a position to support the retirement of the MXN, but does see the long term value in aligning the transactions in the future. AGL suggests that this be reconsidered following the AEMC PoC Review being undertaken in 2020. | The IEC notes the respondent's comment. |
| 5 | PLUS ES | | General | PLUS ES understands the concept and benefits of the ServiceOrderID and agrees to its addition. PLUS ES recommends that the PIN is also amended to include the ServiceOrderID as participants also use it as a meter exchange notification. This is to ensure a consistency behind the intent, objective and outcome of proposed changes. | The IEC notes the respondent's comment and refers to the response to Table 1, Item 8. |
| 6 | PLUS ES | | Version Release History 3.4 | There is a proposed enumeration of Meter Exchange Notification in the MFIN and this has not been identified in the Comments only the addition of the ServiceOrderID field. | The IEC notes the respondent's comment. The Comments field has |

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| | | | | | been updated to reflect the changes. |
| 7 | Evoenergy | 2.1.1 (a) | | <p>If this transaction is to remain, then allow parties to agree to not get MFIN, but prefer this when there is a large volume of information to pass. Suggest adding extra wording:</p> <p>“...for planned mass meter replacements where agreed between the two parties.”</p> | The IEC notes the respondent’s comment. The One Way Notification Process has been updated accordingly. |
| 8 | AGL | 4.1.3 | | AGL supports the inclusion of the Service Order ID in the MXN | The IEC notes the respondent’s comment. |
| 9 | Endeavour Energy | 4.1.3.b | | This clause should be updated to include the new proposed ServiceOrderID in the example | The IEC notes the respondent’s comment. The One Way Notification Process has been updated accordingly. |
| 10 | Evoenergy | 4.1.3 | Table | Clarify that this transaction is to remain or used bilaterally only. | The IEC notes the majority of respondents supported the removal of the MXN, the IEC has decided to remove the transaction. |
| 11 | Origin Energy | | 4.1.3 Table 5 | Origin Energy suggest that industry should make changes to either the MXN or MFIN for the purpose of scheduling meter exchanges. The cost of implementing changes across both the MXN and MFIN would not be insignificant. | The IEC notes the majority of respondents supported the removal of the MXN, |

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| | | | | <p>The changes may also not resolve any outstanding issues in the market.</p> <p>Origin Energy also suggest that rather than patch the OWN's, Industry works together to address the outage scheduling process and develop a single process that works best for the customer and resolves these outstanding issues. Industry through this work can then identify what changes are required to the OWN's to meet this objective.</p> <p>If the MXN is retired, testing will need to be undertaken given important processes are built around this transaction i.e. outage processes, therefore the effective date of December 20 becomes a tight timeframe to meet.</p> | <p>the IEC has decided to remove the transaction and will only update the MFIN transaction.</p> |
| 12 | Origin Energy | | 4.1.3b | <p>Suggest that if the additional field for the MXN is accepted by Industry to update the CSV content to include "ServiceOrderID" to this section:</p> <p>I,RECORDNUMBER,MESSAGENAME,VERSION,NMI,NMICHECKSUM,METE R SERIALNUMBER,NOTBEFOREDATE,NOTAFTERDATE,NOTICEDATE,STA RTDATE,STARTTIME,ENDDATE,DURATION, SERVICEORDERID.</p> | <p>The IEC notes the majority of respondents supported the removal of the MXN, the IEC has decided to remove the transaction.</p> |
| 13 | Simply Energy | 4.1.3 Meter Exchange Notificatio n | 4.1.3 Meter Exchange Notification | <p>Do not support any change to MXN</p> | <p>The IEC notes the majority of respondents supported the removal of the MXN, the IEC has decided to remove the transaction</p> |
| 14 | TasNetworks | | 4.1.3(b) | <p>Example should be updated in line with the proposed additional new ServiceOrderID field</p> | <p>The IEC notes the majority of</p> |

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| | | | | | respondents supported the removal of the MXN, the IEC has decided to remove the transaction |
| 15 | Vector Metering | 4.1.3 | | Support the inclusion of SO ID in the CSV payload | The IEC notes the majority of respondents supported the removal of the MXN, the IEC has decided to remove the transaction |
| 16 | Vector Metering | 4.2.1 | | Support the inclusion of SO ID in MFIN but question if MFIN or PIN should become XML transaction to support meter exchange notification. Refer to response to Issues paper questions. Note: Vector currently uses MXN to support meter exchanges; | The IEC notes the respondent's support for the proposed change and refer to the response to Table 1, Item 8. |
| 17 | AGL | 4.2.3 | | AGL supports the inclusion of the Service Order ID in the MFN | The IEC notes the respondent's comment. |
| 18 | Evoenergy | 4.2.3 | Table 8 | No comment | The IEC notes the respondent's comment. |
| 19 | Origin Energy | | 4.2.3 Table 8 | Origin Energy seek clarification for the MFIN and how the recipient is meant to validate the difference between an initial notification of issue, or a repeated notification of | The IEC notes the respondent's question and notes that the further change to |

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| | | | | <p>issue, that also includes a proposed scheduling of the works to be carried out?</p> <p>In addition, majority of MFIN's are sent by the LNSP for a given NMI. The MFIN for scheduling would need to be sent by a nominated participant which would require an additional set of validation and added complexity/cost for participants.</p> <p>As per previous comment, rather than patch the OWN's, suggest Industry works together to address the outage scheduling process and develop a single process that works best for the customer and resolves these outstanding issues. Industry through this work can then identify what changes are required to the OWN's to meet this objective.</p> | <p>OWN are outside the scope of the consultation. The IEC recommends that Origin Energy submit an ICF for consideration of the suggested changes.</p> |
| 20 | PLUS ES | | <p>MFIN - Table 8 MeterFaultAndIssueNotificationfield values</p> | <p>•Meter Exchange Notice (Used when the MFIN is used as a meter exchange notification) enumeration.</p> <p>PLUS ES does not support the addition of the above enumeration in the MFIN. Please refer to Section 4: One Way Notification Changes – General (below) for further detail.</p> | <p>The IEC notes the respondents comment and refers to the response to Table 1, Item 8.</p> |
| 21 | Simply Energy | 4.2.3 MeterFaultAndIssueNotification Data | 4.2.3 MeterFaultAndIssueNotification Data | <p>Supports the change to include SOID in MFIN</p> | <p>The IEC notes the respondent's support for the proposed change.</p> |
| 22 | TasNetworks | | 4.2.3 Table 8 | <p>See response to question 5 in regard to the proposed change to the MFIN.</p> <p>As an alternative to adding in new fields to the MFIN, is it acceptable for participants to agree to add this information into the existing Notes field?</p> | <p>The IEC notes the respondent's comment and refer to the response to Table 4, Item 13.</p> |

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| 23 | TasNetworks | | General | Consideration may need to be giving to any updates required to the B2B Guide as a consequence of modification to the One Way Notification Process | The IEC notes the respondent's comment. |
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13. Technical Delivery Specification Process

| Reference No | Respondent Name | Old Clause No | New Clause No | Comments | IEC Response |
|--------------|--------------------------|---------------|---------------|---|---|
| 1 | Ergon Energy and Energex | | | No comments on all proposed changes. | The IEC notes the respondent's comment. |
| 2 | IntelliHUB | | | N/A | The IEC notes the respondent's comment. |
| 3 | PLUS ES | | | PLUS ES has no comment on the Technical Delivery Specification. | The IEC notes the respondent's comment. |
| 4 | Tango Energy | | | No Comment | The IEC notes the respondent's comment. |

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| 5 | AGL | Various | | AGL supports the various editorial changes provided within this document. | The IEC notes the respondent's comment. |
| 6 | Evoenergy | 5.4.1.(c) | | Refence says 1.1.1.1 but does not exist. | The IEC notes the respondent's comment. Links and references have been updated. |
| 7 | Vector Metering | 5.4.1(c) | | Unclear where section 1.1.1.1 is in this procedure. This reference is repeated in 6.4.1.(d) step 5 and step 11. (c) Where a Recipient's Inbox contains an invalid <i>ase:MessageAcknowledgement(s)</i> or invalid standalone <i>ase:Event(s)</i> , the Recipient can still initiate Transactions by lodging ".zip" files into their Inbox (refer 1.1.1.1.1.1). These .zip files will be delivered. The Recipient will also continue to receive Transactions, but the MSATS B2B Handler will not deliver the corresponding <i>ase:MessageAcknowledgements</i> . This will eventually result in the flow control limit being exceeded if the error is not resolved. | The IEC notes the respondent's comment. Links and references have been updated. |
| 8 | Evoenergy | 5.4.3.1.4. | | Agree | The IEC notes the respondent's comment. |
| 9 | AGL | 5.8 | | AGL supports the amended field size/transaction limit for B2B messages and associated edits. | The IEC notes the respondent's comment. |

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| 10 | Endeavour Energy | | 5.8 | For clarity, the number of kilobyte for each megabyte should be defined | The IEC notes the respondent's comment. A megabyte has been defined in Section 1.2. |
| 11 | Evoenergy | 5.8 | | No comments | The IEC notes the respondent's comment. |
| 12 | Origin Energy | | 5.8 | Origin Energy support a 10MB maximum file size for MTRD transactions. In addition, limiting the number of transactions within the MTRD group does mitigate the potential problems cause by an increased maximum file size. Origin Energy also supports the volume limit of 1000 transactions per file for the PMD and VMD transactions. | The IEC notes the respondent's support for maximum file size and transaction limit. |
| 13 | Simply Energy | 5.8. Size of aseXML Messages | 5.8. Size of aseXML Messages | Supports 10MB Message Size Limit for MTRD however the 'Limit on number of transactions in Message' to be more than 1000 as we've already seen more than a 1000 PMD transactions compressed in a 1MB file (about 1400 transactions) and hence to minimise the impact, we suggest 2000 transactions to be the upper limit instead. | The IEC notes the respondent's support for maximum file size and the majority of respondent's supported the 1,000 transaction |

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| | | | | | limit for MTRD. |
| 14 | Vector Metering | 5.8(a) | | Vector does not support implementing any transaction volume based limit in the MTRD message group. We note that there is evidence that today participants routinely send and receive messages with over 1000 transactions contained within. | The IEC notes the majority of respondent's supported the 1,000 transaction limit for MTRD. |
| 15 | Evoenergy | 6.4.1.1.(c) | | Link to Figure 2 takes you to Figure 3 Figure 2 Error! Reference source not found. | The IEC notes the respondent's comment. Links and references have been updated. |
| 16 | TasNetworks | | 6.4.1.1(c) | Grammatical - Error reference source not found | The IEC notes the respondent's comment. Links and references have been updated. |
| 17 | Evoenergy | 6.4.1.1.(d) | | Refence says 1.1.1.1 but does not exist. | The IEC notes the respondent's comment. Links and |

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