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B2B Procedures v3.4 and v3.5

Final Report

Prepared by: Information Exchange Committee Version No: 1.0 Date: 22 July 2020

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1. Final Report

1.1 B2B Procedure changes

The Information Exchange Committee (IEC) consulted on recommended process improvements to the B2B Procedures as required by clause 7.17.4 of the National Electricity Rules (NER). The consultation was conducted in accordance with the Rules consultation procedures in Rule 8.9 of the NER. The table below outlines the steps the IEC undertook during the consultation.

Process Stage	Date
Publication of Initial Report and Determination (Initial Report)	29 November 2019
Closing date for submissions in response to the Initial Report	13 January 2020
Publication of First Draft Report and Determination (First Draft Report)	12 February 2020
Closing date for submissions in response to the First Draft Report	11 March 2020
Publication of Second Draft Report and Determination (Second Draft Report)	29 April 2020
Closing date for submissions in response to the Second Draft Report	27 May 2020
Publication of Final Report and Determination (Final Report)	22 July 2020
B2B Procedure v3.4 effective date	1 October 2021
B2B Procedure v3.5 effective date	10 November 2021

The IEC developed the changes in this determination in the interests of improving existing B2B Procedures. The changes consulted on require AEMO B2B e-Hub system changes. These changes were recommended to the IEC by the Business-to-Business Working Group (B2B-WG) on behalf of industry.

These changes are:

- Amending the Service Order Process to:
 - Introduce seven new optional fields to support better communication between Initiators and Recipients of Service Order (SO) transactions.
 - 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.
 - Clarify that when "Other" is selected in a transaction, "Special Instructions" is now Mandatory.
 - Clarify that if a given contact method such as "Customer Email" is selected, the corresponding detail must be provided.
- Amending the Technical Specifications to:
 - Increase the maximum file size and introduce a transaction number limit for the Meter Data (MTRD) transaction group.

- Update the definition of NCONUML from "Non-contestable Unmetered Device Market Load" to "Non-Contestable Unmetered Load".
- Enhance the One Way Notification Process by linking the Planned Interruption Notice (PIN) transaction with the initiating Service Order.

Supporting editorial changes were made to each procedure. These include updating references, fixing typographical errors and ensuring references to unmetered loads are consistent. These are detailed in the change-marked versions available on AEMO's website. Additional tables were added to the B2B Guide to create clarity around transaction and enumeration combinations.

Between the publication of the Second Draft Report and the Final Report, the Australian Energy Market Commission (AEMC) delayed the commencement date of Five Minute Settlement (5MS) and Global Settlement by three months. The IEC recognises that this delay has had a cascading impact on other market reform programs but the full impact of this is not yet known. As such, the IEC has elected to publish the effective dates for the B2B v3.4 and v3.5 Procedures listed in this document. AEMO will be performing a prioritisation exercise on all known and proposed changes for the coming years and will engage with industry on the priorities. AEMO intends for this prioritisation to be outworked over August. If an effective date change is required, then the date will be subject to a consultation and communicated to the rest of the market once it is known.

1.2 Previously consulted-on items to be implemented in stages

Instead of implementing the changes listed in Section 1.1 together, they are to be implemented in two separate stages. These stages are outlined below and allow for certain changes to be aligned with the implementation of 5MS. The tables below summarise the Procedure changes and the effective dates.

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

B2B Procedures v3.4 - effective date 1 October 2021

B2B Procedures v3.5 - effective date 10 November 2021

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)

A summary of the Procedures that are changing and implementation timeframes is provided below.

Consultation date	Procedures version number	Changes
12 February 2020 (final determination 22 July 2020)	V3.4 (1 October 2021)	Technical Specifications – Meter Data file size and transaction limit
12 February 2020 (final determination 22 July 2020)	V3.5 (10 November 2021)	Service Orders (Metering Service Works (MSWs), Supply Abolishment and Allocate NMI)
		One Way Notifications (Meter Exchange Notification (MXN) and PIN review)
		Meter Data Process (NCONUML)

1.3 Changes between the Second Draft Report and Final Report

AEMO received nine submissions in response to the Second Draft report. Copies of all written submissions (excluding any confidential information) have been published on AEMO's website at: https://aemo.com.au/en/consultations/current-and-closed-consultations/b2b-procedures-v3-4-consultation.

Submissions were received from the following organisations:

- AGL
- Energy Queensland (including Ergon Energy Retail and Metering Dynamics)
- ERM
- Origin Energy
- PLUS ES
- Red and Lumo Energy
- Simply Energy
- South Australia Power Networks (SAPN)
- TasNetworks

The submissions included suggestions to change several clauses in the One Way Notifications Process and the B2B Guide. These documents have been updated.

Metering Dynamics, SAPN, Red and Lumo and Origin noted that the effective date of 5MS may be deferred. Between the publication of the Second Draft Report and Final Report, this delay was confirmed to be three months. As the impact from the delay to 5MS and Global Settlements is yet to be confirmed, the B2B Procedures v3.5 effective date will be the same date supported by a majority of industry respondents. If further changes are required to the B2B v3.4 and v3.5 Procedures, these will be further outworked and consulted on.

Several responses to the Second Draft Report raised further questions and suggestions. However, addressing these would require an additional round of consultation to fully consider. This is because the relevant drafting and system impacts are not available for comment from other participants as they would have been if they were suggested in earlier rounds. The IEC is unable to add another round to this consultation. The suggestions included in response to the Second Draft Report that were rejected or not implemented in the Final Report may be considered in a future B2B consultation if a change proposal and use case can be provided. Participants can suggest further changes and provide a use case via the templates available at

https://aemo.com.au/en/consultations/industry-forums-and-working-groups/list-of-industry-forumsand-working-groups/information-exchange-committee.

2. Background

This Final Report has been prepared to detail amendments to the B2B Procedures. These amendments were developed under the IEC's power to manage the ongoing development of B2B Procedures as contemplated by 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 NER.

This Final Report 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 4).
- A consideration of the B2B factors (see section 4.5).

The changes have been considered and recommended by the IEC's B2B-WG. The impacted Procedures are the:

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

3. Scope / Issues Statement

The IEC developed the changes in this Final Report 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	Metering Dynamics
Red Energy and Lumo Energy	SA Power Networks	Vector AMS
Simply Energy	TasNetworks	

This Final Report lists the changes to the B2B Procedures as developed, discussed, and agreed through the IEC's consultation with its B2B-WG. The changes under this B2B consultation have staggered effective dates of 1 October 2021 (Meter Data changes) and 10 November 2021 (other changes).

In summary, the changes include:

- Amending the Service Order Process to:
 - Introduce seven new optional fields to support better communication between Initiators and Recipients of Service Order (SO) transactions.
 - 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.
 - Clarify that when "Other" is selected in a transaction, "Special Instructions" is now Mandatory.
 - Clarify that if a given contact method such as "Customer Email" is selected, the corresponding detail must be provided.
- Amending the Technical Specifications to:
 - Increase the maximum file size and introduce a transaction number limit for the Meter Data (MTRD) transaction group.
 - Update the definition of NCONUML from "Non-contestable Unmetered Device Market Load" to "Non-Contestable Unmetered Load".
- Enhance the One Way Notification Process by linking the Planned Interruption Notice transaction with the initiating Service Order.

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

4. Consultation Process

The following table details the consultation process:

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 First Draft Determination consultation (incl. change marked B2B Procedures)	12 February 2020	
Participant submissions to First 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 Second Draft Report. This includes the change marked procedures.	11 March 2020	22 April 2020
AEMO to publish B2B v3.4 Second Draft Report	22 April 2020	
Participant submissions to Second Draft Report to be provided to AEMO	29 April 2020	27 May 2020
Submission receipt date	27 May 2020	
IEC to consider all valid submissions and prepare the Final Report	27 May 2020	22 July 2020
AEMO to publish B2B v3.4 and B2B v3.5 Final Report	22 July 2020	
B2B Procedures v3.4 effective date	1 October 2021	
B2B Procedures v3.5 effective date*	10 November 2021	
* The IEC requested feedback on this effective date and a majorit	, of recordents indicated	

* The IEC requested feedback on this effective date and a majority of respondents indicated a preference for November 2021 implementation.

The changes summarised above will result in amendments to the Service Order Process, the One Way Notification Process, and the Meter Data Process.

4.1 Service Order changes

4.1.1 Metering Service Works

4.1.1.1 Issue Summary

The recent Metering installation timeframes Rule change places 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 (prescribed) timeframes.

Under these obligations, 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.

In the past, participants have been required to use other ways to convey this information, such as using the special instructions fields, repurposed other fields not designed for the conveyance of this information, or off-market communications methods (phone calls, emails, and spreadsheets). Typically, these approaches have:

- Required additional resources in both Initiator and Recipient businesses to manually populate and review this additional information.
- Been time-consuming.
- Been error-prone; and
- Introduced significant delays in progressing work requests.

The changes would 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 SOs are currently categorised as Mandatory, Required, Optional, or Not Required. As the SO is multi-purpose – that is, the SO will be sent to both Distributors and contestable Metering Providers – the IEC made the requirement to complete the field "Optional/Not Required" (O/N). Accordingly, the Initiator must obtain agreement from the Recipient, before they populate the relevant element in the SO. The B2B-WG does not expect the Retailer to populate the new information when they send the SO to the Distributor (in which instance, the fields would be treated as Not Required).

The IEC has received feedback that the following types of information are currently being communicated in the SO via alternative methods, including the special instructions fields. In response, these information types have been added as fields in existing transactions. These additions will allow participants to convey the following information:

- **Purpose of visit** The SO did 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 SO did not clearly articulate whether a request is part of a customer-initiated request, a Retailer new deployment, or a metering malfunction. Each scenario has different timeframes under the Rules, and therefore different process and reporting requirements.
- **Customer-agreed date** The SO did not clearly articulate whether the customer has already agreed to a fixed date, or date window for the service to be performed. This distinction impacts process and reporting requirements for metering businesses.

- **Customer notification method** The SO did not clearly articulate the method of delivery of formal notifications to customers of supply interruptions. The lead time for delivering this notice differs, based on the method of delivery. This difference impacts a service provider's scheduling processes e.g. the longer delivery times which are required for notification by post results in scheduling in shorter timeframes than for digital delivery.
- **Customer notification address** The SO request did not allow for a Retailer to provide the customer contact details, such as the phone number or e-mail address, where the Retailer has made arrangements for the service provider to generate a Retailer PIN to the customer on the Retailer's behalf. Specific fields in the SO for this information will allow for better automation.
- **Escalation indicator** The SO did not clearly articulate that SOs are to be treated with an agreed level of priority and/or sensitivity over other SOs (e.g. ombudsman, off supply, etc).
- Malfunction exemption details The SO did not allow for details related to AEMO exemptions, including the exemption period, to be conveyed from the Initiator to the service provider. This information informs the Metering Provider (MP) which timeframes apply and allows for appropriate scheduling. This information will be included in fields which indicate the exemption code allocated by AEMO and the end date by which the malfunction must be remedied.

The IEC proposal was supported by a majority of participants, with some caveats, as detailed in the Second Draft Report.

Following further discussion of the feedback by the B2B-WG, several of the fields flagged by respondents were added to the enumerated lists, as part of the SO. These fields, which are listed in the Procedures, were agreed by the respondents in feedback to the Second Draft Report.

The IEC acknowledges that:

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

4.1.1.2 IEC Conclusion

The IEC has decided to make these changes in respect of metering service works, as well as to the Procedures, as set out in section 4.1.1.1. The Service Order Procedures were not changed between the Second Draft Report and this Final Report.

4.1.2 Supply Abolishment

4.1.2.1 Issue Summary and Submissions

In NSW, the field work to abolish supply to connection points is performed by Accredited Service Providers (ASPs), rather than Local Network Service Providers (LNSPs). Accordingly, a customer engages the ASP directly. The LNSP is not involved in the field work.

For a site where a Type 1-4A Meter is installed, confirmation from the MDP is required before the LNSP can make the NMI extinct. 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. Alternately, the MP sends a Notice of Metering Works (NOMW) as to the Meter Removed transaction to the LNSP (although not all MPs submit NOMWs, if they do not perform the meter removal work). Over 6,000 NMI extinctions occurred in NSW in 2018.

Accordingly, participants have expressed a desire for this communication to be done via B2B transactions.

The change clarifies that the Supply Abolishment SO can be used in NSW, with the difference that – unlike in other jurisdictions – its use in NSW will not result in any field work by the LNSP, as the field work will continue to be performed by the ASP. Instead, Retailers will use the Supply Abolishment SO in NSW to request only that the LNSP changes the MSATS NMI status to Extinct.

The majority of respondents were in favour of the changes. However, some distributors and one retailer responded "Other", or listed caveats that highlighted differences between jurisdictions. Evoenergy requested that clarity be provided as to the use of the SO across jurisdictions. SAPN and United Energy noted that the SO does not apply to Victorian distributors. Red and Lumo Energy noted that the SO does not result in the need for fieldwork in NSW and should not have LNSP fees associated with it. This has been reflected in the Procedures and Guide.

The Service Order Process has been updated to reflect jurisdictional differences and physical processes, to ensure that participants use the SO correctly.

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

4.1.2.2 IEC Conclusion

The IEC has decided to make these changes in respect of supply abolishment, as set out in section 4.1.2.1. The Service Order Procedures were not changed between the Second Draft Report and this Final Report.

4.1.3 Allocate NMI

4.1.3.1 Issue Summary and Submissions

The Allocate NMI transaction is used when Retailers wants to register sites in MSATS. Usually, the Initiator is a Retailer and the Recipient is the LNSP. Typically, the LNSP would perform a number of validations, such as ensuring that the site is not already registered in MSATS and that sufficient addressing information has been provided to identify the site in their internal systems.

If the request passes validation, then the LNSP must determine the appropriate values 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), along with the other mandatory roles required for the creation of a NMI in MSATS. The NMI would then be published in MSATS.

With the change of the settlements methodology as a result of the Global Settlements rule, 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. This indication is required for the LNSP to perform the necessary validation and meet their obligation to populate the NMI Classification as defined by the Consumer Administration and Transfer Solution (CATS) Procedure.

Accordingly, the 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 and one retailer presenting caveats. TasNetworks questioned the value of the schema change and how the hub would treat a participant remaining on an n-1 schema. AGL noted that NMI type can be managed through special notes.

However, in response:

• AEMO IT has determined that a participant cannot remain on an n-1 schema, where the B2B Hub is required to validate a transaction on the basis of an 'n' schema.

• The IEC concludes that market efficiency is best serviced by managing standardised information through standardised transactions and fields, not special notes or bespoke processes such as peer-to-peer transactions.

4.1.3.2 IEC Conclusion

The IEC has decided to make these changes in respect of allocate NMI, as well as to the Procedures, as set out in section 4.1.3.1. The Service Order Procedures were not changed between the Second Draft Report and this Final Report.

4.2 One Way Notification changes

4.2.1.1 Issue Summary and Submissions

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

- MFIN is an XML-based transaction which is defined by the aseXML schema. A schema change would be required to add a new optional field.
- MXN is a pre-Power of Choice transaction, which 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, in which Distributors were required to provide notice to Retailers of a pending meter exchange.

The ability for CSV payloads to carry multiple transactions allows for efficient transport between participants. However, this ability 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. Similarly, this arises in respect of other CSV-based payloads such as MDFF, where data can be partially accepted.

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

The IEC concluded that the MXN file eventually needs to be retired, with two options for its replacement:

- 1. Retiring the MXN as part of updating the MFIN or PIN would not require the proposed changes to the MXN.
- 2. **Giving the MXN an extension past this change window** 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 the MXN is to be retired within 12 months of the MFIN change, then the benefits would be diluted, owing to the shorter timeframe over which they can be realised.

As part of the first stage consultation, the IEC sought feedback on its recommendation that the MXN be retired (Option 1). The majority of respondents supported retiring the MXN and updating the MFIN (Option 1). Further, most participants 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.

A majority of respondents supported retiring the MXN, contingent on using the PIN to replace its functions, as this would encourage a more efficient use of the Notifications. This position has been reflected in the Procedures.

In order to reflect the amendments to the MFIN in the PIN, as well as align it with industry preference, the IEC included the following changes:

- *EndDate* to be made Mandatory for an interruption window which is greater than 1 day and Optional for a single calendar day interruption window.
- ServiceOrderID to be a new Required field for the transaction.

The Second Draft Report invited participants to suggest any further enhancements or changes to the PIN, as drafted.

4.2.1.2 IEC Assessment of Second Draft Consultation Submissions

AGL, Metering Dynamics, Origin, Plus ES, Red and Lumo expressed support for the IEC's changes – which were to enhance the PIN in favour of removing the MXN – in response to Question 1 in the Second Draft Report.

The IEC suggests that participants submit an ICF to the IEC, if participants would like the next B2B consultation to consider the following proposed changes (these cannot be considered in the current consultation, because the IEC cannot perform another stage):

- PLUS ES suggested an additional enumeration for the ReasonForInter field.
- PLUS ES suggested additional wording be added to the EndDate definition.
- AGL suggested "End Time" be added to the PIN.
- Red and Lumo suggested making the definition of the PIN more descriptive. The clause is to remain as-is, to avoid limiting the use of PINs in the future.
- AGL suggested that the Use and Definition of EndDate needs modification, to make transactions that have outage information consistent.
- ERM indicated that the benefits of introducing this field outweigh the implementation costs. However, a majority of participants are in favour of this change, so as such, it will remain asis.
- Metering Dynamics and Ergon stated that providing the end date should be Mandatory. The IEC notes that the v3.5 Procedures state that End Date must be Mandatory for an outage with a duration over one day, but is Optional otherwise. If the outage is for a single day, the End Date provides the same amount of value as the Start Date. No further change is necessary.
- Origin suggested the inclusion of NotBefore and NotAfter in the PIN.

Simply Energy suggested a change to One Way Notification Process clause 3.1(b), to align it with the National Energy Retail Rules, as well as an update to the definition of the StartTime field in Table 6, to make its phrasing consistent with StartDate. These clauses have been updated, as they do not require another round of consultation.

4.2.1.3 IEC Conclusion

The IEC has decided to make these changes in respect of One Way Notification changes, as set out in sections 4.2.1.1 and 4.2.1.2. This involves retiring the MXN and enhancing the PIN.

4.3 Increase to transaction size limit for Meter Data

4.3.1.1 Issue Summary and Submissions

As part of the implementation of 5MS, meter data files will sometimes contain a larger number of rows – for an interval meter over a day. Instead of 48 rows, there will be 288 rows. Accordingly, AEMO has recommended that industry increase the maximum file size of the meter data file from 1 MB to 10 MB.

On the recommendation of the B2B-WG, the IEC – together with AEMO – proposes two changes to the B2B Technical Delivery Specification to 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.

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

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

A majority of respondents indicated that they are supportive of a file size increase to 10 MB, noting that their systems are capable of accepting this new file size for MTRD transactions.

The Technical Specification, in section 1.6, has been updated to clearly define one megabyte as 1024 kilobytes.

TasNetworks also recommended the definition of NCONUML be reworded, from "Non-contestable Unmetered Device Market Load", to "Non-Contestable Unmetered Load". This update has been made.

The IEC did not call for further submissions on this Procedure.

4.3.1.2 IEC Conclusion

The IEC has decided to amend the Technical Specifications, as set out in section 4.3.1.1. This amendment involves changing the size and transaction limit for the MTRD transaction group.

Metering Dynamics, Origin Energy, SAPN and Red and Lumo Energy noted in their submissions, that the 5MS and Global Settlement programs may be delayed. This was confirmed ahead of the publication of the Final Report to be a three month delay. As the impact of the delay is yet to be confirmed, the B2B v3.4 and v3.5 Procedures have been released with effective dates of 1 October 2021 and 10 November 2021 respectively.

4.4 B2B Principles

The IEC considers that the B2B Final Report supports each of the B2B Principles, as follows:

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

4.5 B2B Factors

The IEC has determined that the B2B Factors have been achieved for this B2B Final Report and Determination as described below:

B2B Factors	Justification
The reasonable costs of compliance by AEMO and B2B Parties with the B2B Procedures compared with the likely benefits from B2B Communications.	The changes will require an aseXML schema version change; however, participants who do not intend to use these modified transactions can utilise the $n-1$ functionality which will convert the latest version to one prior version with the effect of insulating the change to those who want it.
	As with all schema changes, this $n-1$ will only delay the need for a participant to upgrade to the latest schema until the next schema version change is deployed.
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.	The 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.

B2B Factors	Justification
The implementation timeframe reasonably necessary for AEMO and B2B Parties to implement	These changes require a new version of the aseXML schema to be generated, which will require a low level of change to participant gateways.
systems or other changes required to be compliant with any change to existing B2B Procedures.	AEMO will be required to update the LVI screens to allow the smaller Retailers who to take advantage of these new fields.
	The timeframe for implementation has balanced the time required for this change and the benefits gained (see below).

4.6 Benefits

On the B2B-WG's recommendation, the B2B Final Report supports the B2B Factors in the following ways:

• **Metering Service Works SO changes:** These changes will minimise the need for manual processes and review of the SO's regulatory requirements by participants, as outlined in section 4.1.1. This will enable more efficient SO generation, processing and scheduling.

This change also enables a more efficient process to track and audit SOs, in particular for participants with regulatory obligations, in respect of timings for customer outages.

- **Supply Abolishment SO changes:** These changes create clear and auditable processes for Retailers requesting that NMIs be made extinct in NSW. Consequently, customers will have their accounts finalised and final bills issued much sooner that is possible with estimated bills. These estimated bills will reduce in number.
- Allocate NMI SO changes: These changes will provide benefits by allowing the use of B2B transactions to request NMIs for non-contestable unmetered loads.
- One Way Notification changes: These changes will facilitate more efficient communications between Retailers and service providers, leading to reduced costs, which will ultimately be passed on to customers. These efficiencies will be achieved by linking a meter exchange notice to the originating SO, to allow participants to link SOs and responding actions (e.g. interruption dates).
- **MTRD changes:** These changes will ensure that Meter Data Notification files do not have to be split across several files, ensuring consistency across message size limits between the MSATS Procedures and B2B Procedures.

4.7 Costs

The following changes require a schema change:

- Amending 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.
- Amending the One Way Notification Process, to remove the MXN and enhance the PIN, including linking PIN transactions with the initiating SO.

The B2B e-Hub supports the current schema version. The above changes will be validated with the current schema in mind. For example, service orders would be rejected, where a participant was 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. These updates are so organisations can uniformly participate in the market and receive the benefits of a new schema. If an organisation is currently on the previously-supported schema version r36, then it must upgrade to the version associated with this change.

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

- Amending 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.
- Amending the One Way Notification Process, to remove the MXN and to link the PIN transactions with the initiating SO.

4.8 MSATS Procedures

AEMO has advised that there is no assessed impact to the MSATS Procedures as a result of this B2B Final Report.

5. Other matters

5.1 Consultation timeframes

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

The following table outlines the changes relevant to the B2B Procedures which are currently in the public domain. These changes will not impact all participants equally, with variation by participant category and jurisdictions.

Reform	Effective date
Consumer Data Right	TBC, sometime in 2021
5 Minute Settlement	1 October 2021
Global Settlement	1 May 2022
Default Market Offer 2	1 July 2020
Embedded Networks	ТВС
Customer Switching	ТВС
MSATS Standing Data Review	TBC, expected November 2021 and November 2022
Stand-alone Power Systems – P1	TBC, by Q4 2021 subject to completion of legislative changes
Wholesale Demand Response	24 October 2021

The Initial Report requested participants to indicate a preferred implementation date. The two options were 2 December 2020 or November 2021. A majority of participants expressed preference for the latter. As such, the implementation date for the bulk of the changes in this Final Report is 10 November 2021.

6. B2B Final Determination

The changes are detailed within the attached final procedures published with this Final Report.

Consolidated participant responses to Second Draft report

One Way Notification Process

Participant	Old Clause No	New Clause No	Comments	IEC comment
Metering Dynamics			We approve of the changes to the One Way Notification Process to remove the MXN transaction and to enhance the PIN transaction to allow its use in place of the MXN.	The IEC notes the respondent's support for this change.
PLUS ES		ReasonForInter field	For completeness PLUS ES suggests an additional enumeration of ' Meter Inspection/Audit' is available, as this may require an outage to a customer's supply. Whilst volumes of these instances are currently low, it still is a valid reason and they will begin to increase proportionally as meter fleets start maturing.	The IEC notes the respondent's comment. As this enumeration has not been consulted on, it cannot be added at this stage of consultation. The IEC recommends submission of an Issue Change Form (ICF) if PLUS ES wishes to further this proposal.
PLUS ES		EndDate Definition	For clarity, PLUS ES proposes additional wording to be added, following <i>extended period:</i> This is used where the Initiator wants to advise the Recipient that they have a program of works which may go over an extended period or the last date of the proposed metering installation window.	The IEC notes the respondent's comment. The proposed clause is more restrictive, so it will remain as-is

Participant	Old Clause No	New Clause No	Comments	IEC comment
Simply Energy	3.1 (b)	3.1 (b)	Current wordings are: [Guidance Note 2] PlannedInterruptionNotification must be sent at least 4 business days before the date of the expected interruption. Guidance Note 2 is associated with NERR, and at the time PIN transaction was created, 4 business days rule was applicable however since Feb 2018, NERR got revised and provided flexibility in this rule, as below: 99A Information on retailer planned interruptions – electricity	The IEC notes the respondent's comment. The clause has been updated in order to align the Procedures with the Retail Rules.
			 (1) The retailer: (a) must notify the distributor of <i>retailer planned interruptions</i> and specify the expected date, time and duration of the <i>retailer planned interruption</i>; and (b) must provide the notification under paragraph (a) (as applicable): (i) on the same day the customer provides consent to the retailer under subrule 59C(1); or (ii) within the same time period as the retailer is required to notify the customer under subrule 59C(2). 	
			 With the addition of NERR Rule 59C(1), Simply Energy suggests the following amendment: [Guidance Note 2] PlannedInterruptionNotification must be sent at least 4 business days before the date of the expected interruption or as per customer consent. 	
AGL	CI 4.2	CL 4.2	AGL notes that within the enhanced PIN there is no End Time, noting the recent rule change for shared fuses, there may be a need for a specified end time, and whether a flag indicating an appointment is required and suggest that these additions be considered by the B2BWG.	The IEC notes the respondent's comment. The Rules do not refer to end time. As this field hasn't been consulted on, it

Participant	Old Clause No	New Clause No	Comments	IEC comment
				cannot be added at this stage of consultation. The IEC recommends submission of an Issue Change Form (ICF) if AGL wishes to further this proposal.
Red Energy and Lumo Energy (Red and Lumo)		4.2 One Way Notification changes	Red and Lumo support the use of PIN to replace MXN. We believe the use of PIN, which currently indicates a planned interruption, aligns with the MXN which it will replace. However, it is important to ensure that a review of wording of the definition and purpose in the B2B Procedures (One Way Notification) is undertaken to mitigate any potential misinterpretation. Proposed wording: PlannedInteruptionNotification – The Initiator may use this transaction to inform a Recipient of a planned interruption to supply at a site for the purpose of undertaking planned meter replacements, including meter investigation and works.	The IEC notes the respondent's support for this change. The clause is to remain as-is in order to avoid limiting the use of PINs in the future.
Simply Energy	Table 7	Table 6	Simply Energy notes that <i>NMIChecksum</i> of PIN transaction (as all other XML transactions listed in One Way Notifications Procedures) is marked as not required (N), which is inconsistent with the use of <i>NMIChecksum</i> field in IEC procedures. As such, Simpy Energy recommends that NMICheckum should be changed from N to O (optional) for better consistency, as well to ensure that the enhanced PIN transaction includes all essentiall data elements that are available in MXN transaction. As an e.g. MXN transaction has NMIChecksum as Mandatory (I,RECORDNUMBER,MESSAGENAME,VERSION,NMI, NMICHECKSUM ,METER SERIALNUMBER,NOTB EFOREDATE,NOTAFTERDATE,NOTICEDATE,STARTDATE,STARTTIME,END DATE,DURATION)	The IEC notes the respondent's comment. In order to provide consistency, the NMIChecksum has been made Optional for all transactions.

Participant	Old Clause No	New Clause No	Comments	IEC comment
			In fact, NMIChecksum should be made O in all XML transactions of One Way Notifications Procedures, i.e. (i) PlannedInterruptionNotification (ii) MeterFaultAndIssueNotification (iii) NoticeofMeteringWorksNotification NotifiedParty	
Simply Energy	Table 7	Table 6	StartTime field definition to be changed as follows (to align with <i>StartDate</i>): The proposed start time of the planned interruption to supply is proposed for that NMI by the Initiator.	The IEC notes the respondent's comment. This clause has been updated accordingly.
AGL	4.2.2 Table 7		The Use and Definition of <i>EndDate</i> needs modification if it is to be mandatory for outage windows exceeding one (1) day as proposed in the consultation paper. AGL would suggest that if this is to be the standard applied, then it should be applied to all transactions which have outage information so that usage is consistent where this information is used – i.e.: PIN, MXN, MFIN and Service Order EndDate.	The IEC notes the respondent's comment. This may be suggested in the next B2B consultation to ensure future consistency across fields and definitions. The IEC recommends submission of an ICF if AGL wishes to further this proposal.
ERM		4.2.2	Re. changes to Planned Interruption Notification Data: Service Order ID – ERM do not believe the benefits of introducing this field outweigh the implementation costs and consider the PIN to be fit for purpose without it.	The IEC notes the respondent's comment. However, a majority of participants are in favour of this change

Participant	Old Clause No	New Clause No	Comments	IEC comment
				and as such it will remain as-is.

Question 1 - Given a majority of respondents to the First Draft Report indicated a preference towards enhancement of the PIN to replace the MXN, drafting of it has been provided. With this drafting in mind, are there any further enhancements or changes to the PIN that you would suggest? If so, what?

Participant Name	Comments	IEC Response
AGL	AGL has reviewed the proposal to enhance either the MFN or the PIN and considers than enhancing the PIN is a more preferred solution than enhancing the MFN. The enhanced PIN would contain more information for fewer changes than the enhanced MFN would. In saying this, AGL notes that AEMO will continue to support the previous schema, which is understood to include the Meter Exchange Notice (MXN).	The IEC notes the respondent's support for this change.
Metering Dynamics Ergon Energy Queensland	We agree with the removal of the MXN transaction and the application of the PIN transaction in its place. Other than the addition of the related Service Order field, we do not see the need for any further enhancements to the PIN transaction. In order to remove ambiguity and provide positive customer and business outcomes, we suggest making provision of the end date mandatory.	The IEC notes the respondent's support for this change. The IEC notes that the v3.5 Procedures state that End Date must be Mandatory for a duration over one day and is Optional otherwise. If the outage is for a single day, the End Date provides the same amount of value as the Start Date. No further change is necessary.
Origin Energy	Origin requests as the Planned Interruption Notification is replacing the Meter Exchange Notification to include the fields NOTBEFORE and NOTAFTER (currently an optional field in the MXN). This is to ensure that the Meter Provider can schedule to a target date +/- 2 days if required. Retailers can then maintain compliance under NERR 59A for a Retailer led deployment and ensure the customer experience is maintained for the agreed scenario where a window for exchange is across multiple days.	The IEC notes the respondent's comment. As these fields haven't been consulted on, it cannot be added at this stage of consultation. The IEC recommends submission of an ICF if Origin Energy wishes to further this proposal.
PLUS ES	As per feedback provided for the proposed PIN changes.	The IEC notes the respondent's comment.

Red and Lumo	Red and Lumo support the proposed new enumerations (Meter Installation – Additional, Install Controlled Load, Remove Meter, Move Meter, Meter Reconfiguration), as well as the additional fields (End Date and SO ID).	The IEC notes the respondent's support for this change.
Simply Energy	 Simply Energy agrees with the IEC's proposed changes to: <i>EndDate</i> to be updated from being an optional filed (O) to mandatory/optional (M/O) depending on whether an interruption window is greater than 1 day or a single calendar day, respectively. Adding <i>ServiceOrderID</i> in the PIN transaction, as a new required (R) field for tracking purposes. 	The IEC notes the respondent's support for this change.

General Comments

Participant Name	Document/Section	Clause No	Comments	IEC Response
Metering Dynamics	General Comment		We agree with the proposed staggered effective dates for the Process changes, noting that the outcome of the proposed 5MS rule change delay may impact the timing of these and other proposed market changes and these changes will require schema changes.	The IEC notes the respondent's support for the proposed changes. The 5MS rule change delay may have an impact on the timing of these and other proposed market changes. However, AEMO will publish the Procedures with the effective dates listed in this Report and Determination as it was a subject decided by industry input through this consultation. AEMO will be performing a prioritisation exercise on all known and proposed changes for the coming years and, subject to ELT discussions, will engage with industry on the priorities. AEMO intends for this prioritisation to be outworked over August. If an effective date change is required, then the date will be subject to a consultation.
SAPN	General Comment		If the delay to 5 Minute and Global Settlements proceeds, this single release of procedures also be delayed, and these procedure changes become effective in line with the proposed 5 Minute Settlements go live - 1 July 2022.	Please see response to Metering Dynamics.

Participant Name	Document/Section	Clause No	Comments	IEC Response
Red and Lumo	Previously consulted-on items to be implemented in stages	1.2.2	Red and Lumo appreciate the IEC's acknowledgement of the proposed delay to the implementation of 5 minute and global settlement. With the final determination of the proposed delay due on 9 July 2020, Red and Lumo would like to propose for the final determination of the B2B Procedure changes to be delayed by 1 week to 15 July. This will ensure the decision on the proposed delay rule change can be taken into consideration on all impacted effective dates.	Please see response to Metering Dynamics.
Origin Energy	Technical Delivery Specification v3.4/5 Table 1.6 – Terminology	Table 1.6 (Term – MB & Definition) & 5.8 (Size of aseXML Messages)	In light of the proposed 5 Minute Settlement program deferral, Origin Energy request AEMO to give consideration to re-align dates of the procedures as these changes would be effective prior to go-live. There is a risk that if some participants go early with these changes and other participants do not then it may cause system and operational instability.	Please see response to Metering Dynamics.
AGL	SO Procedures	CI 4 Transactions	AGL notes that with the release of the NMI standing Data – Draft Report, that the Exemption number is now most likely to be populated in MSATS by AEMO. AGL's understanding of the inclusion of the Exemption ID in the SO, was to	Please see response to Metering Dynamics. The IEC notes the respondent's support for the proposed changes. The IEC notes the respondent's comment. The IEC notes that,

Participant Name	Document/Section	Clause No	Comments	IEC Response
			provide information from an MC to an MP. If the exemption ID is to be populated in MSATS, AGL would not support the inclusion of the exemption ID with the SO structure, as it would be redundant information, as the MP would have access to the information at the same time the MC did.	currently, AEMO is commencing the third consultation stage of the MSATS Standing Data Review (MSDR). The MSDR has highlighted the potential benefits of including meter malfunction exemption details in MSATS. The MSDR Second Draft Report notes AEMO's intent to consider the automation of the current exemption process, including to reflect approved exemptions in MSATS. AEMO considers that the proposed addition of the two new fields – Meter Malfunction Exemption Number and Meter Malfunction Exemption Expiry Date – at the NMI level is appropriate, with AEMO being appropriately responsible for populating and updating the fields, once the exemption process is automated. AEMO will need to undertake a detailed design assessment of the new portal in this regard. AEMO will align the introduction of the obligations on it to update the two new fields, as well as the updating of the Meter Malfunction Exemption Procedure, at the time that AEMO works on exemption automation. Accordingly, at this stage the inclusion of the

Proposal for B2B Procedures v3.4

Participant Name	Document/Section	Clause No	Comments	IEC Response
				exemption ID with the SO structure does not duplicate MSATS; and therefore, there is no need to remove the exemption ID from the SO.
PLUS ES	B2B Guide	Version Release History Table – Version 1.5	The comments reference only B2B v3.4 consultation. Most of the updates in the B2B Guide are due to B2B 3.5 consultation.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
Ergon Energy	B2B Guide	General Comment	We note there are additional changes to the MSW since the first consultation stage, which appear to be mostly for clarification or improvement and these are supported. However, given the large volume of transactions in the MSW message type, this will result in some business impacts, requiring internal system changes to support the implementation, as well as downstream processes such as regulatory reporting, and we suggest these will not be insignificant. Notwithstanding, the proposed changes are largely positive.	The IEC notes the respondent's support for the proposed changes.
Simply Energy	B2B Guide	Table 1 : Table of B2B Transactions and Typical Participant combination	Reference to MXN should be deleted from the mapping table.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.

Participant Name	Document/Section	Clause No	Comments	IEC Response
Simply Energy	B2B Guide	Table 1 : Table of B2B Transactions and Typical Participant combination	PIN should be updated: Purpose column: Informs a DNSP recipient about planned interruptions on the network. Recipient column: DNSP or RB	The IEC notes the respondent's comment. The B2B Guide has been updated to be simplified and refer to DNSPs, retailers and MCs.
Origin Energy	B2B Guide v1.5	Table 1	 The Purpose of the Planned Interruption Notification is to inform a DNSP about a planned interruption on the Network, Initiator RB or MC and Recipient as DNSP. With the changes proposed in version 3.5 of the One Way Notification Procedure the following changes need to be made: Informs a DNSP, RB or MC about a planned interruption on the Network. Initator needs to change to RB, MC or MPB Recipient to DNSP, RB or MC. MXN can also now be removed from the table. 	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
Origin Energy	B2B Guide v1.5	Figure 3	Meter Reconfiguration with purpose 'Bidirectional Flows at Premise' should be Y as very common.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
TasNetworks	B2B Guide v1.5	6.5.1.1	Clause should be removed as MXN has been removed from procedure.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.

Participant Name	Document/Section	Clause No	Comments	IEC Response
Origin Energy	B2B Guide v1.5	6.5.1.1	As this section refers to Meter Exchange Notification, suggestion is to remove from section 6.5.1 and amend the reference numbers of subsequent Notifications.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
PLUS ES	B2B Guide	6.5.1.1	PLUS ES suggests the removal of this section to align with the removal of MXN from OWN	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
Simply Energy	B2B Guide	6.5.1.1. Meter Exchange Notification (MXN)	Reference to MXN should be deleted or clarified for future readers of the Guide, depending on whether or not MXN will continue to stay in the schema (even if it's being retired from the Procedures).	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
Origin Energy	B2B Guide v1.5	6.5.1.3	Wording for Planned Interruption Notification needs to be amended to align with v3.5 of the One Way Notification Process.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
Simply Energy	B2B Guide	6.5.1.3. Planned Interruption Notification (PIN)	Additional details should be provided in this section to provide rationale and scope of PIN. Current wording suggests its only useful for Retailers to notify DNSPs.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
PLUS ES	B2B Guide	7.1.1.1 (i)(A)	This does not read well. Needs rewording. PLUS ES suggests: i.e The Recipient may seek to recover costs from the Initiator of the request for actions that were completed or attempted.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.

Proposal for B2B Procedures v3.4

Participant Name	Document/Section	Clause No	Comments	IEC Response
PLUS ES	B2B Guide	7.1.1.1 (i)(D)	 PLUS ES recommend to amend the word should to must and additional wording. Where 'Other' is selected from an enumerated list, details must be provided in the SpecialInstructions field of the service order. 	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
PLUS ES	B2B Guide	7.1.7.11 – Purpose of request	 Amend first word The instead of He For consistency capitalise 'A' on abolishment as New Connections is capitalised. 	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
PLUS ES	B2B Guide	7.1.7.11	PLUS ES recommends the following for the tables in this section:Consistent formatting of tablesTable captions and numbering	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
TasNetworks	B2B Guide v1.5	7.1.7.1(i)	Sub clauses (A) and (B) are duplicates	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
TasNetworks	B2B Guide v1.5	7.1.7.6	The text prior to the table indicates the table includes Regulatory Classification; however this is not included in the table. The newly added text and table require reformatting to align with the existing document format.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
TasNetworks	B2B Guide v1.5	7.1.7.11	Suggest the title of this clause be renamed to something like 'Use of MSW Service Order Fields' or similar.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.

Proposal for B2B Procedures v3.4

Participant Name	Document/Section	Clause No	Comments	IEC Response
Origin Energy	B2B Guide v1.5	7.3.3	Wording for Planned Interruption Notification needs to be amended to align with v3.5 of the One Way Notification Process.	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.
Simply Energy	B2B Guide	7.3.3. Planned Interruption Notification (PIN)	 Additional details should be provided in this section to provide rationale and scope of PIN. Current wording suggests its only useful for Retailers to notify DNSPs. Same as above. Also, 7.3.3 (e) should be consistent with the OWN Procedure wordings suggested above, The Initiator must produce the Planned Interruption Notification transaction a minimum of four business days before the Planned Interruption is scheduled or as per customer consent. Reference to ServiceOrderID should be added. 	The IEC notes the respondent's comment. The B2B Guide has been updated accordingly.