**Attachment 1**

**The following questions relate to the discussion paper “Minimising or solving the challenge of coincident service orders for de-energisation and re-energisations”. Please refer to the discussion paper for further clarification on any of the options outlined below.**

The B2B-WG is seeking feedback on whether the issues related to coincident service orders and multiple service providers will be a short-term issue or will be a longer-term challenge for participants and consumers. These considerations are also framed by the following matters:

* The rollout of smart meters looks like it will take approximately 15 years (based on AEMC discussions in their Post PoC Review)
* Any new retailers would have to have their Safety Management Plans approved in NSW by OFT in order to undertake a re-energisation
* It’s unclear what further jurisdictional barriers may be created (e.g., ACT proposing to not allow remote services for debt disconnection), which may impact the broader move to remote services

**Assumptions**:

* All retailers will want to move exclusively to using remote service orders for de-energisation and re-energisation in all states where this is possible.
* Physical de-energisation requests by retailers will reduce to insignificant levels in the future.

| Audience  | Question | Participant Response  |
| --- | --- | --- |
| Question to Retailers | Do you agree with the assumptions? |  |
| Question to Retailers | Does your business intend to move to the exclusive use of remote service orders (i) in NSW; and (ii) in other NEM states (excluding Victoria)? If yes, how long until you plan to exclusively use remote service orders in each of these states (months/years)? |  |
| Question to Retailers | Do you currently physically de-energise a site if a customer moves out of a premise where there is a smart meter? If ‘no’, then please specify why. |  |
| Question to Retailers | Would you increase use of move out de-energisation if remote services were widely available? |  |
| Question to Retailers | If you intend to move to using remote services, do you intend to remotely de-energise a site if a customer moves out of a premise? |  |

**Option 1 - Extend visibility of SO Requests for Service Providers and Service Providers to continue to manage Coincident Orders**

Under this option, visibility of SOs would be extended via Notified Party (**NP**) transactions to allow service providers to receive some visibility of the requests being made to other service providers. Service providers will be required to incorporate Notified Party transactions into their Coincident Service Order logic. Two potential solutions using Notified Parties have been identified and are discussed in the following sections.

**Option 1a – Single service order Notified Party proposal**

The single service order NP proposal includes that:

* NPs, which are available for all SOs, be made mandatory for all re-energisation and de-energisation SOs; and
* Recipients of a NP transaction treat that notification as an input into determining if coincident SO logic should be applied.

**Assumption**:

* System changes required for the NP logic are (i) costly and (ii) complex

| Audience | Option | Question | Participant Response |
| --- | --- | --- | --- |
| Question to DNSPs | Option 1a – Single service order Notified Party proposal | In the above scenario where a meter bypass may occur, is there a better solution that could be identified?  |  |
| Question to DNSPs | Option 1a – Single service order Notified Party proposal | Would you be willing to receive and make calls/emails to non-regulated MPBs or retailers if you knew the site had been remotely de-energised due to coincident timing? |  |
| Questions to retailers and non-regulated MPBs | Option 1a – Single service order Notified Party proposal | What were the approximate costs associated with the system updates to introduce the NP logic? |  |
| Questions to retailers and non-regulated MPBs | Option 1a – Single service order Notified Party proposal | Were these changes complex? |  |
| Questions to retailers and non-regulated MPBs | Option 1a – Single service order Notified Party proposal | Please provide any additional comments here. |  |
| Questions to DNSPs | Option 1a – Single service order Notified Party proposal | Have you already introduced the NP logic in your systems?  |  |
| Questions to DNSPs | Option 1a – Single service order Notified Party proposal | If no, what is the earliest that you could undertake the upgrade?  |  |
| Questions to DNSPs | Option 1a – Single service order Notified Party proposal | Do you believe the changes to NP logic will be (i) costly, and (ii) complex for your business? |  |
| Questions to retailers, non-regulated MPBs and DNSPs | Option 1a – Single service order Notified Party proposal | Given that some participants have built for this solution, whilst others have not, is it a feasible to have this solution included in the B2B Guide as soon as possible, with the procedures to transition in ‘x’ years?  |  |
| Questions to retailers, non-regulated MPBs and DNSPs | Option 1a – Single service order Notified Party proposal | If there was a transition period through to this change being adopted in all NEM states (aside from Victoria), at what point should this be? |  |

**Option 1b – Two-service order proposal**

In this option, the incoming retailer raises both a physical re-energisation and remote re-energisation SO and sends them to the DNSP and non-regulated MPB respectively. This means that both the DNSP and the non-regulated MPB will need check whether the status of the meter and / or NMI status is “D” before any action is taken.

These service orders already exist in the B2B system, however, AEMO understands that retailer systems may require changes to apply the two-service order logic. Additionally, the service provider responses are inconsistent and would require further logic development in the retailer systems or more work by DNSPs to make their responses consistent.

| Audience | Option | Question | Participant Response |
| --- | --- | --- | --- |
| Questions to retailers and non-regulated MPBs | Option 1b – Two-service order proposal  | Have you built for the two-service order NP logic?  |  |
| Questions to retailers and non-regulated MPBs | Option 1b – Two-service order proposal  | If you have built for this logic, what were the approximate costs associated with the system updates to introduce the two-service order NP logic?  |  |
| Questions to retailers and non-regulated MPBs | Option 1b – Two-service order proposal  | Were these changes complex? Please provide any additional comments here |  |
| Questions to retailers and non-regulated MPBs | Option 1b – Two-service order proposal  | Please provide any additional comments here. |  |
| Questions to DNSPs and competitive metering providers | Option 1b – Two-service order proposal  | Do you currently check the status of a meter and / or NMI status before a truck roll is performed? |  |
| Questions to DNSPs and non-regulated MPBs | Option 1b – Two-service order proposal  | Do you currently check the status of a meter and / or NMI status before a truck roll is performed? |  |
| Questions to retailers, non-regulated MPBs and DNSPs | Option 1b – Two-service order proposal  | Is this solution feasible to introduce?  |  |
| Questions to retailers, non-regulated MPBs and DNSPs | Option 1b – Two-service order proposal  | Is it an option to introduce the two-service order NP process (as a transitional step) prior to the introduction of the single NP process?  |  |
| Questions to retailers, non-regulated MPBs and DNSPs | Option 1b – Two-service order proposal  | Please provide any comments. |  |

## **Option 2 – Retailers to become more ‘active’ in the management of coincident service orders**

Currently retailers are passive in the management of coincident service orders, i.e., they do not need to undertake any actions themselves because service providers do this for them. Option 2 requires retailers to take a more active role in the future management of coincident service orders.

## **Option 2a – New permission rules - retailers to check for inflight SO requests before requesting a service**

Retailers would perform a new process - ‘check B2B Hub’ - before submitting a SO request. Existing B2B processes do not allow for visibility of work requested on a NMI by other participants, therefore an incoming retailer is unable to see that a premise for their new customer is about to be, or has just been, de-energised.

## **Option 2b - Retailers rely on a non-regulated service provider to alert them to the presence of two SOs for move-in / move-out scenarios**

Under this option, retailers would request a non-regulated service provider to advise them of the presence of a SO request for a particular NMI. This would be required where the non-regulated service provider receives a request for a remote re-energisation and the also receives a NP transaction for a SO request to the DNSP for a physical disconnection. This option will only work when FRMPs requesting a physical de-energisation makes the non-regulated service provider a notified party.

**Option 2c – SO alert**

This option would provide the incoming retailer with an alert when they initially raise a re-energisation service order that would indicate if a de-energisation for the NMI had already been raised and was still open / just completed and which party was processing this SO.

This alert process could also occur if a de-energisation was raised after the initial re-energisation service. A retailer could use this alert to identify any gaps where the re-energisation was sent and enable a new service order to be sent to the correct party. The benefit of this option is the removal of the need for a customer needing to identify the issue (off-supply) and raise their FRMP – and will enable the re-connection to occur sooner in most cases.

| Audience | Option | Question | Participant Response |
| --- | --- | --- | --- |
| Questions to Retailers | Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a serviceOption 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert | Are Options 2a, 2b or 2c viable solutions which will reduce the likelihood of coincident service orders?  |  |
| Questions to Retailers | Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a serviceOption 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert | Are there any potential contractual issues with this solution for working with multiple non-regulated service providers?  |  |
| Questions to Retailers | Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a serviceOption 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert | Is this process something that you could introduce within your business?  |  |
| Questions to Retailers | Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a serviceOption 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert | Which option is more viable (Option 2a, 2b or 2c)?  |  |
| Questions to Retailers | Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a serviceOption 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert | Do you have any other feedback relating to Options 2a, 2b or 2c? |  |

## **Option 3 - Non-system interim solutions which could assist in managing the risk of coincident service orders until more effective solutions can be delivered**

Three further options have been identified which may assist participants in managing some of the risk relating to coincident service orders for retailers, non-regulated service providers and customers.

**Option 3a – Phone call to DNSP (LNSP) by a non-regulated MPB prior to attending site**

Under the case of Scenario 1 (where the FRMP requests a physical de-energisation and an incoming retailer requests a remote re-energisation, refer Table 1), neither the incoming retailer nor their non-regulated MPB has visibility that the DNSP has physically de-energised the site for up to five business days. This is because the DNSP (and any other participant) has up to five business days to update the MSATS NMI status fields. In practice, updates to MSATS are generally completed in 1-2 days, however, there still remains the delay in visibility of the NMI status fields.

This may not be an efficient solution from a participant perspective, however, it is focussed on reducing the time that a customer is potentially without supply.

| Audience | Option | Question | Participant Response |
| --- | --- | --- | --- |
| Question to DNSPs | Option 3a – Phone call to DNSP (LNSP) by a competitive metering provider prior to attending site | Would the DNSPs (LNSPs) be open to receiving a call (enquiry) from a non-regulated MPB before it attends a site to confirm if the LNSP has performed a physical de-energisation?  |  |

**Option 3b – Phone call or email to DNSP (LNSP) by a non-regulated MPB to withdraw pending physical de-energisation**

Similar to Option 3a, if a non-regulated MPB is aware of a coincident service order, this solution proposes that it phones or send an email to the DNSP (LNSP) and request that the pending physical de-energisation is withdrawn. The DNSP would then send a ‘not completed’ SO to the FRMP, advising of the reason.

| Audience | Option | Question | Participant Response |
| --- | --- | --- | --- |
| Question to DNSPs and non-regulated MPBs | Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation | Would the DNSPs (LNSPs) and non-regulated MPBs be open to this process?  |  |
| Question to DNSPs and non-regulated MPBs | Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation | Could this be implemented immediately?  |  |
| Question to DNSPs and non-regulated MPBs | Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation | Is a phone call or email process preferred?  |  |
| Question to DNSPs and non-regulated MPBs | Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation | What might the gaps be in this approach? |  |
| Question to DNSPs and non-regulated MPBs | Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation | Is the non-regulated MPB the most appropriate party to make the phone call, or should the call come from the retailer? |  |

**Option 3c - Reducing the number of business days to update MSATS NMI status and meter status fields**

Participants currently have five business days to update the MSATS NMI status and meter status fields should their status change. This could be reduced to two business days which would be another partial solution to minimising customers being off-supply but would still leave a higher risk of an off-supply than previously identified solutions.

| Audience | Option | Question | Participant Response |
| --- | --- | --- | --- |
| Question to all participants | Option 3c - Reducing the number of business days to update MSATS NMI status and meter status fields | Do you support the reduction from five to two business days to update the MSATS NMI status and meter status fields? |  |
| Question to all participants | Option 3c - Reducing the number of business days to update MSATS NMI status and meter status fields | If the update period is reduced, should the coincident period window (also five days) be reduced or remain at five days? |  |

**Additional Questions**

|  |  |  |
| --- | --- | --- |
| Audience | Question | Participant Response |
| Question to all participants | Do you have a preferred option of those that have been presented in this paper? |  |
| Question to all participants | Are there other viable solutions that have not been presented in this paper? If so, please describe. |  |
| Question to all participants | Do you have any other comments you would like to provide? |  |