



**Information Exchange Committee**  
C/ - IEC Secretariat – AEMO Ltd

Level 22

530 Collins Street

Melbourne VIC 3000

Tel: (03) 9609 8000

Fax: (03) 9609 8080

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# B2B Procedures v3.7 Consultation

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**3 August 2021**

Draft Report

Proposed Improvements regarding Addressing, Coincident Service Orders, Person Names,  
Unauthorised Connections

# B2B v3.7 Draft Report

Date of Notice: 3 August 2021

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

This Second Stage 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.

## Matters under consultation

The changes (Changes) which are proposed (Proposal) are:

**Table 1 Summary of Proposal**

Instrument	New/Amended	Proposed Change
Customer Site Details Notification Process	Amended	To only allow structured site address in Life Support Notification.
Service Order Process	Amended	To only allow structured site address, to add Section and Deposited Plan (DP) Number and to include coincident De-Energisation and Re-Energisation SOs for non-regulated service providers.
Technical Delivery Specification	Amended	To allow changes to the Person Name Given and Person Name Title fields.
B2B Guide	Amended	To include a process by which an Unauthorised Connection is detected and disconnected, and to add Section and DP Number.
Meter Data Process	Version alignment	No Change except version number
One Way Notification Process	Version alignment	No change except version number

## The consultation process

The IEC invites written submissions on these matters under consultation, including any alternative or additional proposals which you consider may better meet the objectives of this Second Stage Consultation, as well as the National Electricity Objective in section 7 of the National Electricity Law.

Submissions in response to this Notice should be sent by email by 5:00pm (AEST) on 18 August 2021 to [NEM.Retailprocedureconsultations@aemo.com.au](mailto:NEM.Retailprocedureconsultations@aemo.com.au). A response template has been provided on AEMO's website. Please send any queries about this consultation to the same email address.

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

Please identify any parts of your submission that you wish to remain confidential, explaining 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 which is identified as confidential may be given less weight in the decision-making process than material which is published.

In your submission, you may request a meeting with the IEC to discuss the matters under consultation, stating why you consider a meeting is necessary or desirable. If appropriate, meetings may be held jointly with other Consulted Persons. The IEC will generally make details of matters discussed at a meeting available to other Consulted Persons and may publish them, subject to confidentiality restrictions.

**Table 2 Summary of consultation stages**

<b>Process Stage</b>	<b>Date</b>
<b>Publication of Issues Paper</b>	31 May 2021
<b>Closing date for submissions in response to Issues Paper</b>	6 July 2021
<b>Publication of Draft Report and Determination (Draft Report)</b>	3 August 2021
<b>Closing date for submissions in response to Draft Report</b>	18 August 2021
<b>Publication of Final Report and Determination (Final Report)</b>	29 September 2021

The IEC developed the Changes in the interests of improving the B2B Procedures and do not require AEMO B2B e-Hub system changes. However, some participant systems may require changes. The Changes were recommended to the IEC by Endeavour Energy, Origin Energy and the Retailer representatives of the Business-to-Business Working Group (B2B-WG).

## Changes between the Issues Paper and Draft Report

Ten submissions were received in response to the Issues Paper, from:

- AGL.
- CitiPower Powercor.
- Jemena.
- Origin Energy.
- PLUS ES.
- Red and Lumo Energy.
- SA Power Networks.
- TasNetworks.
- United Energy.
- Vector Metering.

The majority of responses were in favour of the Proposal.

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# 1. Background

This Draft Report has been prepared to summarise the Changes and IEC Response. The Changes have been developed under the IEC’s power to manage the ongoing development of the B2B Procedures as contemplated by NER 7.17.7(a)(2), as well as changes under NER 7.17.4.

This Draft Report also provides information which is considered by the IEC in determining whether to change the B2B Procedures, namely:

- An issues statement in respect of the Proposal (see section 1.1).
- A summary of the Changes, including consideration of the B2B Principles (see sections 1.1 and 2.5).
- A consideration of the B2B factors (see section 2.6).

The Changes have been considered and recommended by Distributor, Metering and Retailer representatives of the B2B-WG.

If accepted, the Changes will result in amendments to:

- Customer and Site Details Notification Process;
- Service Order (SO) Process;
- Technical Delivery Specification; and
- B2B Guide.

The Changes would also result in version alignment of the:

- Meter Data Process; and
- One Way Notification Process.

The Changes are not expected to result in AEMO system changes. However, some participant systems may require changes.

## 1.1 Issues statement and scope

The IEC has developed the Changes in this Draft Report to improve the functionality of B2B transactions, as well as to incorporate routine communication between electricity retail market participants into B2B transactions. The Changes were recommended to the IEC by Endeavour Energy, Origin Energy and the Retailer representatives of the B2B-WG.

The members of the B2B-WG are as follows:

**Table 3 B2B-WG members by sector**

<b>Retailers</b>	<b>Distributors</b>	<b>Metering</b>
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	

In summary, the proposed Changes are to:

- Customer and Site Details Notification Process – to only allow structured site address in Life Support Notification.
- Service Order Process – to only allow structured site address, to add Section and DP Number and to include coincident De-Energisation and Re-Energisation SOs for non-regulated service providers.
- Technical Delivery Specification – to allow changes to the Person Name Given and Person Name Title fields.
- B2B Guide – to include a process by which an Unauthorised Connection is detected and disconnected, and to add Section and DP Number.

The relevant effective dates for the B2B Procedures are as follows:

**Table 4 Change effective dates**

<b>Procedures</b>	<b>V3.6*</b> <b>(effective 10 November 2021)</b>	<b>V3.6.1#</b> <b>(effective 10 November 2021)</b>	<b>V3.6.2##</b> <b>(effective 10 November 2021)</b>	<b>V3.7</b> <b>(effective 7 November 2022)</b>
<b>Customer and Site Details Notification Process</b>	Amended (Procedure changes)	Amended (version only)	Amended (version only)	Amended (Procedure changes)
<b>Service Order Process</b>	Amended (version only)	Amended (Procedure changes)	Amended (Procedure changes)	Amended (Procedure changes)
<b>One Way Notification Process</b>	Amended (version only)	Amended (version only)	Amended (version only)	Amended (version only)
<b>Technical Delivery Specification</b>	Amended (version only)	Amended (version only)	Amended (version only)	Amended (Procedure changes)
<b>Meter Data Process</b>	Amended (version only)	Amended (version only)	Amended (version only)	Amended (version only)

\* Previously consulted on: <https://aemo.com.au/en/consultations/current-and-closed-consultations/b2bv36>

# Previously consulted on: <https://aemo.com.au/consultations/current-and-closed-consultations/b2b-v361-minor-amendment>

## Currently under consultation: <https://aemo.com.au/consultations/current-and-closed-consultations/b2b-v362-minor-amendment>

## 1.2 Consultation plan

The proposed consultation plan is as follows:

**Table 5 Consultation Date Plan**

<b>Stage</b>	<b>Start Date</b>	<b>End Date</b>
Publication of Notice of Consultation and Issues Paper	31 May 2021	
Participant submissions to be provided to AEMO	31 May 2021	6 July 2021
Closing date for submissions in response to Issues Paper	6 July 2021	
IEC to consider all valid submissions and prepare Draft Report, including change-marked Procedures	6 July 2021	3 August 2021
Publication of Draft Report	3 August 2021	
Participant submissions to be provided to AEMO	3 August 2021	18 August 2021
Closing date for submissions in response to Draft Report	18 August 2021	
IEC to consider all valid submissions and prepare Final Report, including change-marked Procedures	18 August 2021	29 September 2021
Publication of Final Report	29 September 2021	



# 2. Proposed Changes

## 2.1 Address Fields

The following Changes are focused on delivering uniformity and process efficiencies in B2B communications for address fields, resulting in more timely services for electricity customers at the time of NMI allocation.

### 2.1.1 Remove Unstructured Site Address

#### **Issue summary and submissions**

The Change is to obligate participants to provide site address information in the structured format by removing the ability of participants to provide site address information in the unstructured format.

The Change aligns with AEMO's final determination on the MSATS Standing Data Review published on 7 September 2020. Among the changes, site address information in the structured format will change from being Optional to being Required from 14 March 2022, and Mandatory from 7 November 2022.

Accordingly:

- Site address information in the unstructured format will no longer be allowed in MSATS from 7 November 2022.
- Any existing NMI with site address information in the unstructured format must be converted to the structured format by 7 November 2022.

For consistency and efficiency, the B2B Procedures should also remove the unstructured site address information.

The Change:

- Involves updating the B2B Procedures to clarify when site address information in the structured format is required.
- Has been reflected in Life Support Notification of the Customer and Site Details Notification Process and Table 13 and Table 14 of the Service Order Process.
- Does not impact the postal address information, which should continue to have the option to be in the unstructured format.

In their feedback:

- All respondents except Origin Energy supported the Change. Vector Metering also noted that the only time an address is used in a SO is during a "Allocate NMI" SO from the retailer to the DNSP. Otherwise, NMI is the identifying key and details are sourced from MSATS.
- Origin Energy sought clarity on the conversion of unstructured to structured format by 7 November 2022. Origin Energy queried whether there will be attempts to discover the structured address for integrity purposes, or whether the current data will be lifted into a structured format. Origin Energy also noted the ability to bi-laterally agree on reconciling the address information with distributors, to ensure data integrity, thereby achieving the benefit of the Change.
- All respondents except Red and Lumo supported the proposed implementation date of 7 November 2022.
- Red and Lumo did not support the proposed implementation date of 7 November 2022. Instead, they indicated their support for the Change becoming effective as of the second quarter of 2023 or 7 November 2022, with a 6-month transition period. They noted the clean-up of the structured address in MSATS and removal of the unstructured address must be completed by 7 November

2022, as part of the work being undertaken through the MSDR. Red and Lumo preferred a transition period from the 7 November 2022 of at least 6 months, to ensure that the MSATS address changes have been appropriately completed and reflected in retailer systems.

- Jemena noted that:
  - the two structured address format (B2B vs B2M) defeats the purpose of accuracy of information and streamlined development, querying whether AEMO can synchronise Structured Address Format in Business-to-Market (B2M) and B2B; and
  - the application of the Change to Structured Address in Life Support Notification (LSN), but not in Customer Details Notification (CDN).

## **IEC assessment and conclusion**

The IEC considers that:

- The change to structure address will commence for new NMI Allocate Addressees and LSN transactions from 7 November 2022;
- There will be no new unstructured addresses in these two transactions as of 7 November 2022;
- The transition period for existing data is a matter for the MSDR data transition plan in MSATS. AEMO is performing analysis of the unstructured address volumes to inform the planning of the MSDR transition;
- The CDN only contains postal addresses, which remain unstructured as MSATS is the source of truth for the structured site address for a NMI. The structured address in the LSN supports the intent of the LSN to provide details for a premises requiring the use of life support equipment; and
- Jemena is requested to raise an ICF to synchronise the structured address formats in B2B and B2M.

### **2.1.2 Add Section and DP Number**

#### **Issue summary and submissions**

The Change is to enable the Section and DP Number to be communicated via defined fields in the B2B transactions, especially in respect of the Allocate NMI Service Order. The Section and DP Number is only required in NSW and ACT. The Proposal is to use existing fields to define Section and DP Number for the Allocate NMI Service Order.

The Proposal included three options for the IEC to consider on the provision of these fields:

- Create new fields to represent Section and DP Number for the Allocate NMI SO.
- Create new fields to represent Section and DP Number in the ADDRESS format definition.
- Use existing fields to define Section and DP Number for the Allocate NMI SO.

Given that Section and DP Number is only required for NSW and ACT, a solution is preferred which has minimal impact on participants which operate in other jurisdictions. Accordingly, the Proposal is to use existing fields to define Section and DP Number for the Allocate NMI SO.

The Change:

- Involves updating the definition of FormReference and FormNumber fields, to indicate that they will be used for DP Number and Section Number in NSW and ACT.
- Has been reflected in Table 13 of the Service Order Process.
- Does not require any changes to the Procedures which apply to DNSPs in other jurisdictions.

In their feedback:

- PLUS ES noted that they will not be using these fields and sought clarification that DP referred to Deposit Plan and not Delivery Point.

- AGL, Origin Energy and TasNetworks supported the Change. TasNetworks also noted that Section Number and DP Number is not used in Tasmania. CitiPower/Powercor, Jemena and United Energy's responses indicated that this Change did not apply to them.
- Red and Lumo did not support the Change. They indicated their preference to create new fields to represent Section and DP Number in the ADDRESS format definition. They argued that repurposing existing fields introduces an element of complexity in both system build and human entry.
- Vector Metering responded as "other", noting that as the fields are used during an "Allocate NMI" SOR from the retailer to the DNSP, it is up to them to agree. In principle, Vector Metering considered, the re-purposing of fields is not best practice.
- All respondents either supported the implementation date of 7 November 2022 or indicated that the Change did not apply to them.

### IEC assessment and conclusion

The IEC considers that:

- The reference is to deposited plan, not delivery point, so will be amended accordingly. All references in the Procedures will change to Deposited Plan and NOT Delivery Point, or DP as the acronym.
- The Change is specific to NSW & ACT. The creation of two new fields would require an AEMO schema change. The Change is to not overly burden all of industry with changes to B2B schema based on specific jurisdictions.
- The Change will become effective on 7 November 2022.

## 2.2 Changes to Person Name Given and Person Name Title fields

### Issue summary and submissions

The Change is focused on delivering uniformity and process efficiencies in B2B communications for person name fields, to reflect current naming conventions, as well as to align with the current Australian Standard AS4950-2017 – Amd1 2020. In turn, the Change will lead to appropriate naming preferences being used in customer correspondence, thereby delivering an improved customer experience.

The Change allows Retailers to populate:

- PersonNameTitle field with a null value to accommodate the customer's request to not use a name title, or to use the more recently created title types (for example, Mx).
- PersonNameGiven field with a null value to accommodate the customer's request (for example, where a customer only has one name, rather than a first name and a last name).

The Change has been reflected in Table 1 of the Technical Delivery Specification. Market Participants will be required to update their systems to allow for the additional values and a null value.

In their feedback:

- All respondents except PLUS ES and TasNetworks supported the Change.
- PLUS ES questioned the benefit realisation, given participants have currently built their own system logic to overcome the issue.
- TasNetworks noted a potential benefit in bringing the use of the PersonName fields in line with the current Australian Standard. The Change may impose a reasonable cost individually and collectively across industry participants, to implement changes (if required) to their respective systems. TasNetworks questioned the cost of facilitating the Change without some analysis of the true benefit which it would provide. TasNetworks also questioned whether consideration has been given to deferring the Change until a point in time when there may be other B2B changes required which provide more broader customer or industry benefit.

- All respondents except TasNetworks supported the implementation date of 7 November 2022. Red and Lumo also noted that they will not support an implementation date before 7 November 2022. CitiPower/Powercor noted they support the Change becoming effective in line with the MSDR changes.

### **IEC assessment and conclusion**

The IEC considers that:

- The Change's benefit is to the consumer based on their name preferences, instead of a costed benefit. The limitations are not in the schema, but in the B2B Procedure: Technical Delivery Specification.
- The Change will become effective 7 November 2022.

## **2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses**

### **Issue summary and submissions**

During the development of the Notified Party processes for multiple service providers, it was identified that there was less clarity for non-regulated metering businesses in respect of the management of coincident de-energisation and re-energisation service orders.

The new section 2.18 of the B2B Procedure: Service Order Process (Procedure):

- Was included to specifically cover the case where a non-regulated business received a de-energisation request after a re-energisation request within the five-business day window for coincident services.
- Contains the concept of avoiding supply interruptions for the customer to the extent possible, mirroring the requirements placed on the regulated DNSPs in similar circumstances.

In their feedback:

- All respondents except PLUS ES and Vector Metering supported the Change.
- PLUS ES agreed with the Change for non-regulated MPBs, but considered that the Change will deliver no additional value to the industry when the procedures become effective. Non-regulated MPBs which currently offer remote energisation services have already implemented coincident checking of energisation service orders which they receive. The Change caters to a 'siloed' participant approach, in a subset of use cases. However, the Change does not address the complications in respect of two separate entities which are potentially requested to perform energisation services, thereby increasing the likelihood that a customer will be left off supply.
- Vector Metering considered that the Change places obligations on what businesses do on the receipt of a transaction. The B2B principle is to define the transactions that flow between businesses, instead of the triggers inside a business. The Initiators and Recipients should be free to agree as to the manner in which transactions are to be used. Vector Metering questioned whether the IEC has the remit to place such obligations on businesses. As already demonstrated, the major Metering Coordinators (MCs) have built mechanisms, as part of the remote re-energisation/de-energisation offering, to manage coincident SO's, in the absence of this obligation. While DNSPs want regulation to define what they will do, Competitive MC's do not. Accordingly, Vector Metering considers that enshrining this in regulation is unnecessary.
- All respondents except PLUS ES either supported the implementation date of 7 November 2022 or indicated that the Change did not apply to them.
- PLUS ES noted that it has already implemented the proposed obligations, cognisant of the potential industry impacts with the introduction of remote energisations. PLUS ES further mitigates instances where

a customer may be left off supply, by performing coincident checking of Notified Party Notification (NPN), when received.

- Red and Lumo noted that the question should be in respect of the Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses. Red and Lumo also supported an implementation date earlier than 7 November 2022.

### **IEC assessment and conclusion**

The Procedure is published by AEMO in accordance with NER 7.17.3. For each B2B communication between B2B Parties, the Procedure must specify the required transaction data inputs and outputs, as well as business process flows and related timing requirements, in respect of the defined services in the Service Orders. Accordingly, the Participants are enabled to:

- Request Service Orders;
- Receive confirmation that the work will or will not be attempted or undertaken; and
- Subsequently, receive confirmation the work has or has not been completed as requested.

In this regard, where the Initiator has sent multiple service orders to the MPB as the Recipient, the specifications in Procedure section 2.18 reflect the principles that:

- The Customer's interests take priority, that is, to ensure that power is not disrupted; and
- Each Initiator must use reasonable endeavours to minimise sending a Recipient multiple conflicting ServiceOrderRequests for a single NMI.

Specifically, Procedure section 2.18 appropriately requires the transaction between the two businesses, whereby the Recipient must send the Initiator a ServiceOrderResponse transaction with:

- The ServiceOrderStatus of 'Not Complete'; and
- The ExceptionCode of "De-energisation Not Completed Due To A Re-energisation."

The Change will become effective on 7 November 2022.

The IEC notes the suggestion of PLUS ES in respect of Notified Party Notifications.

## **2.4 Unauthorised Connection Process**

### **Issue summary and submissions**

The Change to the Unauthorised Connection Process:

- includes the mapping of the process by which an Unauthorised Connection is detected, as well as the steps which each participant may take;
- aims to provide clarity in respect of the steps which are performed following the identification of an unauthorised connection;
- does not change any current participant processes; and
- has been included in the B2B Guide under the title 'Unauthorised Connection – RB/DB Process'.

In their feedback:

- All respondents except PLUS ES, TasNetworks and Vector Metering supported the inclusion of the process flow with regards to the Unauthorised Connection Process.
- PLUS ES agreed that while actions need to be taken, this process should not be in the B2B Guide. PLUS ES also noted that obligations should be identified and/or enhanced to achieve the objective, then included in the relevant AEMO procedures, including the Service Level Procedures.
- TasNetworks does not see any benefit of including the suggested process flow. TasNetworks considers that there is no context or explanation which supports the diagram. Participants should

have existing processes to manage unauthorised connections, given that the relevant issues are not new. Further, the process for managing such instances may be individual to each participant, based on their own internal processes.

- Vector Metering noted that the process should start with the DNSP detecting actual interval data (zero or non-zero) on a Deenergised NMI, then making the NMI active. The Retailer detects the NMI status change, then acts to deenergise the site, if required. Accordingly, the MDP is not needed in this flow.
- All respondents except TasNetworks agreed with the implementation date of 7 November 2022. AGL noted that the Change is simply a change to the Guide which reflects current business practice. Accordingly, AGL considered that there should be no issues (except perhaps increased understanding) by the Change being re-released earlier than the 7 November 2022 release. Red and Lumo noted that the Change is not intended to be a change from current practice, but instead simply a clarification of the steps which are performed. Red and Lumo supported an implementation date of 7 November 2022, or much earlier.
- TasNetworks did not support the implementation date, given that it did not support the inclusion of the suggested process flow.

### IEC assessment and conclusion

The considers that:

- the Change is to clarify where illegal reconnections happen and how they should be processed;
- The process flow is intended to guide participants on the high-level steps, not to influence the underlying steps which are performed by each relevant business;
- The process will be updated to better reflect the intent and context; and
- The Change will be effective 7 November 2022.

## 2.5 B2B Principles

The IEC considers that the B2B Draft 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 Procedures, in terms of transactions, are not jurisdiction-specific, 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.

## 2.6 B2B Factors

The IEC has determined that the B2B Factors have been achieved as follows:

B2B Factors	Justification
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The reasonable costs of compliance by AEMO and B2B Parties with the B2B Procedures compared with the likely benefits from B2B Communications.

The proposed changes will ensure continued compliance by AEMO and B2B Parties with the NER in addition to consistency between B2B Communications and business practices.

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. They allow participants to streamline their operations, better meet regulatory requirements and allow for all relevant information to be contained within the Communications structure to allow for more efficient processes.

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.

The proposed changes do not require system changes to the B2B e-Hub. Accordingly, no AEMO implementation timeframe is required. From a business process perspective, the amendments only clarify existing B2B Procedures, reflect changed Rules or formalise existing "best practice", so minimal implementation timeframes should be necessary in respect of the required changes.

## 2.7 Benefits

The proposed Changes support the B2B Factors in the following ways:

- Customer and Site Details Notification Process – the Changes enable customer’s confidence that the industry has a consistent and efficient end to end process for communicating site address information.
- Service Order Process – the Changes enable customer’s confidence that the industry has a consistent and efficient end to end process for communicating site address information, Section and DP Number information.
- Technical Delivery Specification – the Changes aim to reflect customer’s confidence that Retailers, Distributors, and other service providers are recognising their preferences.
- B2B Guide – the Changes clarify the process for enabling detection and removal of unauthorised connection and the addition of Section and DP Number information.

## 2.8 Costs

AEMO does not expect the Changes will require a schema upgrade or changes to the Low Volume Interface.

Participants should consider the costs, as well as risks, associated with the Changes, including:

- The costs and resources which they require to implement the Changes, as well as their ongoing operational cost and resources.
- Their ability to implement the Changes on the proposed dates, considering other known or upcoming industry changes, as well as internal projects.

## 2.9 MSATS Procedures

AEMO has advised that the Changes have been assessed as not impacting the Market Settlements and Transfers Solution (MSATS) Procedures.

# 3. B2B Proposal

The Changes are detailed in the attached draft procedures, which are published with this Draft Report.



# 4. Glossary

This Draft Report uses many terms that have meanings defined in NER. The NER meanings are adopted, unless otherwise specified.

<b>Term</b>	<b>Definition</b>
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
B2B	Business-to-Business
B2B-WG	Business-to-Business Working Group
B2M	Business-to-Market
CDN	Customer Details Notification
CSDN	Customer and Site Details Notification
DNSP	Distribution Network Service Provider
DP	Deposited Plan
FRMP	Financially Responsible Market Participant
IEC	Information Exchange Committee
LNSP	Local Network Service Provider
LSN	Life Support Notification
MC	Metering Coordinator
MSATS	Market Settlements and Transfers Solution
NEM	National Electricity Market
NER	National Electricity Rules
NERL	National Energy Retail Law
NMI	National Metering Identifier
NPN	Notified Party Notification
SO	Service Order

# 5. Summary of submissions in response to Issues Paper

## 5.1 General Feedback

Participant Name	Topic	Comments	IEC response
SAPN	General Feedback	<p>SA Power Networks believes that AEMO have published the incorrect change marked version of the One Way Procedure.</p> <p>Within the Issues Paper supporting this consultation and the version release history of the One Way Procedures, it is stated there are no changes, however, within the published procedure AEMO have included changes in sections 2.1.2 (d) and 4.2.5 (Table 9).</p> <p>SA Power Networks recommends that this be corrected when AEMO publish the draft determination.</p>	<p>The IEC notes the respondent's comment and will ensure the draft One Way Procedures are correctly published with the Draft Determination.</p>

## 5.2 Issue Paper Questions

Participant Name	Topic	Question	Comments	IEC response
AGL	2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	AGL supports this change.	The IEC notes the respondent's support for the change.
CitiPower Powercor	2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.
Jemena	2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes. See also Topic 2.10 below.	The IEC notes the respondent's support for the change.

Participant Name	Topic	Question	Comments	IEC response
Origin Energy	2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Other, Origin is seeking clarity on the conversion of unstructured format to structured by 7 November 2022. With this conversion, will there be attempts to discover the structured address for integrity purposes or will the current data be lifted into a structured format  Origin also puts forward the ability to bi-laterally agree on reconciling the address information with distributors to ensure data integrity and benefit of the change is met.	<ul style="list-style-type: none"> <li>The change to structure address will be for new NMI Allocate Addressees and Life Support Notifications transactions from 7 November 2022</li> <li>There will be no new unstructured addresses in these two transactions as of 7 November 2022.</li> <li>The transition period of existing data is a matter for the MSDR data transition plan in MSATS. AEMO is performing analysis of the unstructured address volumes to inform the planning MSDR transition.</li> </ul>
PLUS ES	2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Red Lumo	2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Red Energy and Lumo Energy (Red and Lumo) support this proposed change.	The IEC notes the respondent's support for the change.
TasNetworks	2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes, TasNetworks supports this change.	The IEC notes the respondent's support for the change.
United Energy	2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Vector	2.1.1 Remove Unstructured Site Address	Question 1: Do you support the Changes in respect of Removal of Unstructured Site Address? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes  Comment – the only time an address is used in a SO is during a "Allocate NMI" SOR from the retailer to the DNSP. Otherwise NMI is the identifying key and details are sourced from MSATs.	The IEC notes the respondent's support for the change.
AGL	2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	AGL does not expect issues with a Nov 2022 implementation.	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
CitiPower Powercor	2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No, we support these changes becoming effective on 7 November 2022 and in line with the MSDR changes.	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Jemena	2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
Origin Energy	2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Origin agrees with the implementation date of 7 November 2022	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
PLUS ES	2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	PLUS ES has no issues with an implementation date of 7 Nov 2022	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.

Participant Name	Topic	Question	Comments	IEC response
Red Lumo	2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Red and Lumo do not support the proposed implementation date of 7 November 2022. The clean up of the structured address in MSATS and removal of the unstructured address must be completed by 7 November 2022 as part of the work being undertaken via the MSDR. It is our preference to have a transition period from the 7 November 2022 of at least 6 months to ensure that the MSATS address changes have been appropriately completed and reflected in retailer systems. We would therefore support this change becoming effective as of the second quarter of 2023, or 7 November with a 6 month transition noted.	<p>The IEC notes the respondent does not support the implementation date of 7 November 2022.</p> <ul style="list-style-type: none"> <li>• The change to structure address will be for new NMI Allocate Addressees and Life Support Notifications transactions from 7 November 2022</li> <li>• There will be no new unstructured addresses in these two transactions as of 7 November 2022.</li> <li>• The transition period of existing data is a matter for the MSDR data transition plan in MSATS. AEMO is performing analysis of the unstructured address volumes to inform the planning MSDR transition.</li> </ul>
TasNetworks	2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No, it makes sense to align this with the MSDR changes.	The IEC notes the respondent supports the implementation date of 7 November 2022.



Participant Name	Topic	Question	Comments	IEC response
United Energy	2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No, we support these changes becoming effective on 7 November 2022 and in line with the MSDR changes.	The IEC notes the respondent supports the implementation date of 7 November 2022.
Vector	2.1.1 Remove Unstructured Site Address	Question 2: If the Changes in respect of Removal of Unstructured Site Address were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Yes  Comment – As a MP, we don't use these as we don't receive Allocate NMI SOR.	The IEC notes the respondent supports the implementation date of 7 November 2022.
AGL	2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	AGL supports these changes.	The IEC notes the respondent's support for the change.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
CitiPower Powercor	2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	NA	
Jemena	2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	No - N/A to Jemena	
Origin Energy	2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes, Origin supports this change relating to Add Section and DP number	The IEC notes the respondent's support for the change.

Participant Name	Topic	Question	Comments	IEC response
PLUS ES	2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	<p>Other – PLUS ES will not be using these fields.</p> <p>Clarification sought as DP Number and Delivery Point are 2 different fields.</p> <p>DP Number defined as:</p> <p><b>DPNumber</b> A deposited plan (DP) number corresponds to an image that defines the legal boundaries of a plot of land in NSW and ACT</p> <p>PLUS ES understood the requirement was for the Section Number and Deposit Plan (DP) Number.</p>	<p>The IEC notes the respondent's comment and confirms the reference is deposited plan not delivery point and will be amended.</p> <p>All references in the procedures will name as Deposited Plan and NOT as Delivery Point or DP as the acronym.</p>
Red Lumo	2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	<p>Red and Lumo do not support the proposal. It would be our preference to create new fields to represent Section and DP Number in the ADDRESS format definition. Repurposing existing fields introduces an element of complexity in both system build and human entry.</p>	<p>The IEC notes the respondent does not support the change.</p> <p>The IEC notes the respondent's comments however this change is specific to NSW &amp; ACT and creating two new fields would require an AEMO schema change. The proposed change is to not overly burden all of industry with changes to B2B schema based on specific jurisdictions.</p>

Participant Name	Topic	Question	Comments	IEC response
TasNetworks	2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes, TasNetworks supports this change, although Section Number and Delivery Point (DP) Number is not used in Tasmania.	The IEC notes the respondent's support for the change.  The IEC notes that Tasmania does not utilise Section Number and Deposited plan.  DP = is deposited plan not delivery point
United Energy	2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	NA	
Vector	2.1.2 Add Section and Delivery Point (DP) Number	Question 3: Do you support the changes detailed with regards to Add Section and Delivery Point (DP) Number? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Other – as this is used during a "Allocate NMI" SOR from the retailer to the DNSP then it is up to them to agree. In principle, it is bad practice to re-purpose fields...just saying.	The IEC notes the respondent's comments however this change is specific to NSW & ACT and creating two new fields would require an AEMO schema change. The proposed change is to not overly burden all of industry with changes to B2B schema based on specific jurisdictions.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
AGL	2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	AGL does not expect issues with a Nov 2022 implementation.	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
CitiPower Powercor	2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	NA	
Jemena	2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No - N/A to Jemena	

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Origin Energy	2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Origin agrees with the implementation date of 7 November 2022	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
PLUS ES	2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	PLUS ES has no issues with an implementation date of 7 Nov 2022	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
Red Lumo	2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Red and Lumo support the proposed implementation date of 7 November 2022.	The IEC notes the respondent supports the implementation date of 7 November 2022.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
TasNetworks	2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No.	The IEC notes the respondent supports the implementation date of 7 November 2022.
United Energy	2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	NA	
Vector	2.1.2 Add Section and Delivery Point (DP) Number	Question 4: If the changes proposed in this document with regards to Add Section and Delivery Point (DP) Number were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No Issue – We don't used this.	The IEC notes that the respondent does not utilise these fields.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
AGL	2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	AGL supports these changes.	The IEC notes the respondent's support for the change.
CitiPower Powercor	2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.
Jemena	2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.



<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Origin Energy	2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes, Origin supports this change relating to Person Name fields	The IEC notes the respondent's support for the change.
PLUS ES	2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Other Whilst PLUS ES understands the proposed changes, we question the benefit realisation given participants have currently built their own system logic to overcome this issue.	The IEC notes the respondent's comments. The benefit is not costed as the benefit is to the consumer based on their preferences.
Red Lumo	2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Red and Lumo support these proposed changes.	The IEC notes the respondent's support for the change.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
TasNetworks	2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Other. Whilst TasNetworks considers there may be benefit in bringing the use of the PersonName fields in line with the current Australian Standard, this may impose a reasonable cost individually and as a collective across industry participants to implement changes if required to their respective systems. We would therefore question the cost of facilitating such a change without some analysis of the true benefit this will provide. Is there ability to consider deferring this change until a point in time when there may be other B2B changes required that provide more broader customer or industry benefit?	The IEC notes the respondent's comments. The benefit is not costed as the benefit is to the consumer based on their preferences.  Limitations are not in the schema but in the B2B Procedure: Technical Delivery Specification. It is noted, that for the organisations within industry that work across gas and electricity. gas will already implement this change resulting in a temporary misalignment with gas and electricity.
United Energy	2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Vector	2.2 Changes to Person Name Given and Person Name Title fields	Question 5: Do you support the changes detailed with regards to Person Name fields? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.
AGL	2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	AGL does not expect issues with a Nov 2022 implementation.	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
CitiPower Powercor	2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No, we support these changes becoming effective on 7 November 2022 and in line with the MSDR changes.	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Jemena	2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Yes	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
Origin Energy	2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Origin agrees with the implementation date of 7 November 2022	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
PLUS ES	2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	PLUS ES has no issues with an implementation date of 7 Nov 2022	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Red Lumo	2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Red and Lumo support the proposed implementation date of 7 November 2022. We would not support these changes being brought in any earlier than this date.	The IEC notes the respondent supports the implementation date of 7 November 2022.
TasNetworks	2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Yes, as noted by response in question 5.	The IEC notes the respondent supports the implementation date of 7 November 2022.
United Energy	2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No, we support these changes becoming effective on 7 November 2022 and in line with the MSDR changes.	The IEC notes the respondent supports the implementation date of 7 November 2022.

Participant Name	Topic	Question	Comments	IEC response
Vector	2.2 Changes to Person Name Given and Person Name Title fields	Question 6: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No Issue	The IEC notes the respondent supports the implementation date of 7 November 2022.
AGL	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	AGL supports these changes.	The IEC notes the respondent's support for the change.
CitiPower Powercor	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	NA	

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Jemena	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.
Origin Energy	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes, Origin supports this change relating to Coincident Service Order Logic for non-regulated businesses	The IEC notes the respondent's support for the change.

PLUS ES	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	<p>Other</p> <p>Whilst PLUS ES agrees the proposed change for non-regulated MPBs, this will deliver no additional value to the industry when the procedures become effective. Non-regulated MPBs currently offering remote energisation services have already implemented coincident checking of energisation service orders they receive.</p> <p>The proposed changes cater to a 'siloe'd' participant approach, a subset of use cases, without addressing the complications of 2 separate entities potentially being requested to perform energisation services. Hence increasing the likelihood that a customer will be left off supply.</p>	<p>The IEC notes respondent's comment.</p> <p>The B2B Procedure: Service Order Process (Procedure) is published by AEMO in accordance with NER 7.17.3. For each B2B communication between B2B Parties, the Procedure must specify the required transaction data inputs and outputs, as well as business process flows and related timing requirements, in respect of the defined services in the Service Orders. Accordingly, the Participants are enabled to:</p> <ul style="list-style-type: none"> <li>• Request Service Orders.</li> <li>• Receive confirmation that the work will or will not be attempted or undertaken.</li> <li>• Subsequently, receive confirmation the work has or has not been completed as requested.</li> </ul> <p>In this regard, where the Initiator has sent multiple service orders to the MPB as the Recipient, the specifications in Procedure 2.18 reflect the principles that:</p> <ul style="list-style-type: none"> <li>• The Customer's interests take priority, that is, to ensure that power is not disrupted.</li> <li>• Each Initiator must use reasonable endeavours to minimise sending a Recipient multiple conflicting ServiceOrderRequests for a single NMI.</li> </ul> <p>Specifically, Procedure 2.18 appropriately requires the transaction between the two</p>
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Participant Name	Topic	Question	Comments	IEC response
				<p>businesses, whereby the Recipient must send the Initiator a ServiceOrderResponse transaction with:</p> <ul style="list-style-type: none"> <li>• The ServiceOrderStatus of 'Not Complete'.</li> <li>• The ExceptionCode of "De-energisation Not Completed Due To A Re-energisation."</li> </ul>
Red Lumo	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Red and Lumo support this proposal.	The IEC notes the respondent's support for the change.
TasNetworks	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes, TasNetworks supports this change.	The IEC notes the respondent's support for the change.

Participant Name	Topic	Question	Comments	IEC response
United Energy	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	NA	

Vector	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 7: Do you support the changes detailed with regards to Coincident Service Order Logic for non-regulated businesses? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	<p>No. This is placing obligations on what businesses do on the receipt of a transaction. The principles of B2B are to define the transactions that flow between Businesses, not what these trigger inside a business. Initiators and Recipients should be free to agree how transactions are to be used. Is this in the remit of the IEC to place these obligations on businesses?</p> <p>As already demonstrated the major MC's have built mechanisms as part of the remote reen/deen offering to manage coincident SO's without this obligation existing. While DNSP's want regulation to define what they will do Competitive MC's do not. We believe enshrining this in regulation is unnecessary.</p>	<p>The IEC notes the respondent does not support the change.</p> <p>The B2B Procedure: Service Order Process (Procedure) is published by AEMO in accordance with NER 7.17.3. For each B2B communication between B2B Parties, the Procedure must specify the required transaction data inputs and outputs, as well as business process flows and related timing requirements, in respect of the defined services in the Service Orders. Accordingly, the Participants are enabled to:</p> <ul style="list-style-type: none"> <li>• Request Service Orders.</li> <li>• Receive confirmation that the work will or will not be attempted or undertaken.</li> <li>• Subsequently, receive confirmation the work has or has not been completed as requested.</li> </ul> <p>In this regard, where the Initiator has sent multiple service orders to the MPB as the Recipient, the specifications in Procedure 2.18 reflect the principles that:</p> <ul style="list-style-type: none"> <li>• The Customer's interests take priority, that is, to ensure that power is not disrupted.</li> <li>• Each Initiator must use reasonable endeavours to minimise sending a Recipient multiple conflicting ServiceOrderRequests for a single NMI.</li> </ul>
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Participant Name	Topic	Question	Comments	IEC response
				<p>Specifically, Procedure 2.18 appropriately requires the transaction between the two businesses, whereby the Recipient must send the Initiator a ServiceOrderResponse transaction with:</p> <ul style="list-style-type: none"> <li>• The ServiceOrderStatus of 'Not Complete'.</li> <li>• The ExceptionCode of "De-energisation Not Completed Due To A Re-energisation."</li> </ul>
AGL	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	AGL does not expect issues with a Nov 2022 implementation.	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
CitiPower Powercor	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	NA	

Participant Name	Topic	Question	Comments	IEC response
Jemena	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Yes	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
Origin Energy	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Origin agrees with the implementation date of 7 November 2022	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
PLUS ES	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	PLUS ES have already implemented the proposed obligations, cognisant of the potential industry impacts with the introduction of remote energisations.  PLUS ES to further mitigate instances where a customer may be left off supply has expanded their solution to also include coincident checking of Notified Party Notification (NPN), when received.	The IEC notes the respondent has already implemented proposed obligations.  The IEC notes the respondent's suggestion around Notified Party Notification.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Red Lumo	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	Red and Lumo believe this question should be in regards to the Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses. We support the proposed implementation date of 7 November 2022, and in fact would support this coming in sooner rather than later.	The IEC notes the respondent supports the implementation date of 7 November 2022.
TasNetworks	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No.	The IEC notes the respondent supports the implementation date of 7 November 2022.
United Energy	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	NA	

Participant Name	Topic	Question	Comments	IEC response
Vector	2.3 Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses	Question 8: If the changes proposed in this document with regards to Person Name fields were to be adopted, would your organisation have any issues with an implementation date of 7 November 2022?	No Issue	The IEC notes the respondent supports the implementation date of 7 November 2022.
AGL	2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	AGL supports these changes.	The IEC notes the respondent's support for the change.
CitiPower Powercor	2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.

Participant Name	Topic	Question	Comments	IEC response
Jemena	2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.
Origin Energy	2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes, Origin supports the inclusion of the process flow for Unauthorised Connection	The IEC notes the respondent's support for the change.
PLUS ES	2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Other Whilst PLUS ES agrees that actions need to be taken, we propose that this process should not be in the B2B Guide. Obligations should be identified and/or enhanced to achieve the objective and included in the respective AEMO procedures such as service level procedures etc.	This process proposes clarity around where illegal reconnections happen and how these should be processed. This will be updated to better reflect intent and context.



Participant Name	Topic	Question	Comments	IEC response
Red Lumo	2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Red and Lumo support this proposal.	The IEC notes the respondent's support for the change.
TasNetworks	2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	No. TasNetworks does not see any benefit of including the suggested process flow. There is no context or explanation that supports the diagram. Participants should have existing processes to manage unauthorised connections as this is not new, and the process for managing such instances may be individual to each participant based on their own internal process.	The IEC notes the respondent does not support the change.  This process flow is intended to guide participants on the high level steps and not influence the underlying steps performed by each business involved.  This will be updated to better reflect intent and context.
United Energy	2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	Yes	The IEC notes the respondent's support for the change.

Participant Name	Topic	Question	Comments	IEC response
Vector	2.4 Unauthorised Connection Process	Question 9: Do you support the inclusion of the process flow with regards to Unauthorised Connection Process? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")	No- Not these ones – the process should start with DNSP detecting actual interval data (zero or non-zero) on a Deenergised NMI and should make the NMI active. Retailer detects the NMI status change and then acts to deenergise site if required. No need for MDP in this flow.	The IEC notes the respondent does not support the change.  This process flow will be updated to better reflect intent and context.
AGL	2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	AGL does not expect issues with a Nov 2022 implementation.  Noting that this is simply a change to the Guide which reflects current business practice, there should be no issues (except perhaps understanding ) by having this change made in Nov 2022.	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
CitiPower Powercor	2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	No	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Jemena	2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	Yes	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
Origin Energy	2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	Origin agrees with the implementation date of 7 November 2022	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.
PLUS ES	2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	PLUS ES has no issues with an implementation date of 7 Nov 2022	The IEC notes the respondent's agreement to a 7 November 2022 implementation date.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Red Lumo	2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	Red and Lumo understand this proposal is not intended to be a change from current practice, and simply clarification of the steps performed. We therefore are happy to support an implementation date of 7 November 2022 or much earlier.	The IEC notes the respondent supports the implementation date of 7 November 2022.
TasNetworks	2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	Yes, as per response to question 9, TasNetworks does not support the inclusion of the proposed process flow.	The IEC notes the respondent does not support the change.  This process flow will be updated to better reflect intent and context.
United Energy	2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	No	The IEC notes the respondent supports the implementation date of 7 November 2022.

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
Vector	2.4 Unauthorised Connection Process	Question 10: If the process flow proposed in this document with regards to Unauthorised Connection Process is included in the B2B Guide, would your organisation have any issues with an implementation date of 7 November 2022?	No issue – MDP’s obligations already exist in CATS procedures. No change to our systems.	The IEC notes the respondent would have no change to their systems.  This process flow will be updated to better reflect intent and context.
AGL	2.10 Questions on proposed changes	Question 11: Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?	Consideration should be given to making changes to the B2B guide and the updating of B2B procedures with editorial / informational which could be made sooner as there is no system or process impact on industry.	The preference is to keep the current date for these changes to align the majority of topics within one version.

Jemena	2.10 Questions on proposed changes	Question 11: Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?	<p>Q1) Can AEMO synchronised the Structured Address format in B2M &amp; B2B?</p> <p>Specifically, the handling of second house number?</p> <p>MSDR Ph 1 (B2M) will introduce "HouseNumberTo" (May 2022) in it's roadmap to use "Structured Address". i.e.</p> <pre>&lt;HouseNumber&gt;4&lt;/HouseNumber&gt; &lt;HouseNumberTo&gt;10&lt;/HouseNumberTo&gt;</pre> <p>However, in B2B, the current way is repeating &lt;HouseNumber&gt; field and we don't see any change suggested in B2B v3.7 (Nov 2022). i.e.</p> <pre>&lt;HouseNumber&gt;4&lt;/HouseNumber&gt; &lt;HouseNumber&gt;10&lt;/HouseNumber&gt;</pre> <p>Can B2B v3.7 follows the same as MSDR?</p> <p>Q2) Change to Structured Address has been introduced in section 5.5 – only for Life Support Notification (LSN) Transactions.</p> <p>Why the same change hasn't been introduced for Customer Details Notification (CDN) Transactions ? There should be consistency between those 2 Transactions – LSN &amp; CDN.</p>	<p>The IEC notes that this would drive a B2B schema change for one field.</p> <ol style="list-style-type: none"> <li>1) Requests Jemena to raise an ICF to have the structured address formats in B2B and B2M synchronised.</li> <li>2) CDN is the postal address whereas LSN is the site address and the site address is required to be structured</li> </ol>
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Participant Name	Topic	Question	Comments	IEC response
Origin Energy	2.10 Questions on proposed changes	Question 11: Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?	No Comment	

PLUS ES	2.10 Questions on proposed changes	Question 11: Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?	<p>PLUS ES believes a more robust solution could be made available than the currently proposed 'coincident checking' obligations for non-regulated MPBs, with respect to the introduction of remote energisations.</p> <p>PLUS ES supports that all participants, Retailers, non-regulated MPBs and LNSPs should use and/or be able to consume Notified Party transactions.</p> <p>Where metering with enabled communications has been installed, the MPB ≠ LNSP. Hence, with respect to energisation of a site, the industry has transitioned from a 1:1 (Retailer- LNSP) relationship to a potential three participant relationship which could affect the consumer's supply state. These stakeholders are, the Retailer (Current/Incoming), the LNSP and/or the MPB. The current Market systems and procedures do not support near real time visibility to impacted participants.</p> <p>In the absence of near real time systems, a timelier and cost-efficient mechanism to bridge the gap and mitigate the instances of a customer being left off supply is to:</p> <ul style="list-style-type: none"> <li>mandate the NPN for de-energisation and re-energisation SO and</li> <li>place an obligation on the LNSP and non-regulated MPB to include in their coincident checking the NPN.</li> </ul>	<p>The IEC notes the respondent's comments.</p> <p>The IEC has tasked the B2B WG with exploring options for coincident SO checking across multiple parties.</p>
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			<p>PLUS ES would support having the above proposed solution introduced for consultation as it would provide a more robust solution by ensuring:</p> <p>efficient processes: the Retailer, the LNSP and the non-regulated MPB would collectively operate under the same guidelines and procedures</p> <p>mitigation against a customer being left off supply due to different parties receiving the de-energisation and re-energisation request: i.e. providing visibility of energisation requests at the NMI irrespective of which party was requested to perform the action.</p> <p>Mandating the NPN for the above SOs would also deliver additional operational efficiency options, i.e.</p> <p>For Retailers – to comply with their obligation to notify the LNSP of a de-energisation and the reason, especially if the de-energisation SO was sent to the MPB.</p> <p>For non -regulated MPBs – this will ensure a NPN is received for all de-energisation SOs sent to the LNSP, mitigating against wasted truck visits when their meter has stopped communicating.</p> <p>Contrary to popular belief this ‘visibility’ challenge and its potential consequences will not be a transitional issue but rather an ongoing challenge; specific jurisdictional</p>	
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Participant Name	Topic	Question	Comments	IEC response
			requirements, retailers choosing to de-energise at the fuse are just a few contributing factors.	
Red Lumo	2.10 Questions on proposed changes	Question 11: Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?	Red and Lumo see the introduction of Section Number and DP number specific fields as a positive as opposed to the current practice of using the special instructions field. However, it would be better to have these two values given their own dedicated fields. The benefits of having dedicated fields makes the process development and training much simpler to deliver against from an operational perspective. It also allows for more accurate reporting development. Using the same field for multiple purposes across multiple states introduces more complexity to build for in terms of both systems and reports.	The IEC notes the respondent's comments however this change is specific to NSW & ACT and creating two new fields would require an AEMO schema change. The proposed change is to not overly burden all of industry with changes to B2B schema based on specific jurisdictions.
Vector	2.10 Questions on proposed changes	Question 11: Are there better options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?	Create a new field for DPID rather than re-purpose an existing field.	The IEC notes the respondent's comments. There has been confusion between DPID (delivery point ID) and DP (deposited plan) which is a specific identifier in NSW and ACT for parcels of land.  DPID (delivery point ID) will not be in B2B at all. The proposed change is intended to provide the deposited plan information for NSW and ACT.

Participant Name	Topic	Question	Comments	IEC response
AGL	2.10 Questions on proposed changes	Question 12: What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	<p>The challenges relating to customers naming is already inherent in the current schemas and has only been limited by the B2B technical Guide and likely some participants internal validations, so it this change is relatively straightforward.</p> <p>Changes for structured addresses will require all NMIs to have a structured address associated with them, which in tun will require a number of NMIs in MSATS to be updated and then that data to be replicated for the relevant participants prior to B2B going live.</p>	<p>The IEC notes the respondent's comments.</p> <p>The transition period of existing data is a matter for the MS DR data transition plan in MSATS, with the transition period being between 1 May 2022 and 7 November 2022. AEMO is performing analysis of the unstructured address volumes to inform the planning plan for MS DR transition.</p>
Jemena	2.10 Questions on proposed changes	Question 12: What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	<p>The benefits of having structured address is accuracy of information and streamlined development effort.</p> <p>However, having 2 structured address XML format (B2B vs B2M) from AEMO defeats this purpose.</p>	<p>The IEC notes the respondent's comments and Requests Jemena to raise an ICF to have the structured address formats in B2B and B2M synchronised.</p>
Origin Energy	2.10 Questions on proposed changes	Question 12: What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	No Comment	

<b>Participant Name</b>	<b>Topic</b>	<b>Question</b>	<b>Comments</b>	<b>IEC response</b>
PLUS ES	2.10 Questions on proposed changes	Question 12: What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	PLUS ES does not see challenges in adopting operationally the proposed changes. It is the quantification/qualification of the industry benefits for some of the proposed changes which PLUS ES finds challenging.	The IEC notes the respondent's comments on industry benefits.  The benefit is not costed as the benefit is to the consumer based on their preferences.
Vector	2.10 Questions on proposed changes	Question 12: What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Nil.	

Participant Name	Topic	Question	Comments	IEC response
AGL	2.10 Questions on proposed changes	Question 13: What are the costs and/ or benefits if the proposed changes were not made? Consider the perspectives of process, training, system and customer impacts.	<p>The proposed changes reflect a need to better represent customers own identities or to improve location identification for MSATS and Service Orders.</p> <p>In the first instance, not being able to properly represent a customer's identity is a poor outcome for the customer and their interactions with the energy industry.</p> <p>In the second instance, noting that MSATS will require structured addresses, then aligning Service orders to the same standard will minimise errors in identifying service addresses.</p> <p>Poor / inadequate addressing leads to incorrect locational identification which in turn leads to manual work to correctly identify sites, failed services, or other inefficiencies in industry work.</p> <p>While each failure is minor the overall impact of these is sufficiently large to warrant change.</p>	The IEC notes the respondent's comments and support.
Origin Energy	2.10 Questions on proposed changes	Question 13: What are the costs and/ or benefits if the proposed changes were not made? Consider the perspectives of process, training, system and customer impacts.	<p>Benefit would be lost for not improving the data integrity of structures addresses, particularly when investigating unauthorised usage</p> <p>Not implementing the proposed change for coincident SOs results in poor customer experience and potential disconnection risk</p>	<p>The IEC notes the respondent's comments and support.</p> <p>The IEC has tasked the B2B WG with exploring options for coincident SO checking across multiple parties.</p>

PLUS ES	2.10 Questions on proposed changes	Question 13: What are the costs and/ or benefits if the proposed changes were not made? Consider the perspectives of process, training, system and customer impacts.	<p>PLUS ES supports the following:</p> <p>Remove Unstructured site address – we support this as we believe a standardisation will deliver clarity and align with MSATS, reducing downstream resourcing impacts.</p> <p>Add Section and DP Number – we do not believe this would deliver any benefit as these values are not widely/consistently known. Hence, if these changes are not delivered the impact would be minimal.</p> <p>Changes to Person Name Given and Person Name Title fields: PLUS ES has current logic which already mitigate against the challenges the proposed changes are trying to mitigate. They would not deliver further enhancements, instead PLUS ES would potentially incur further costs for no realised benefit.</p> <p>Treatment of Coincident De-Energisation and Re-Energisation SOs by Non-Regulated Businesses: PLUS ES has already implemented the proposed obligations including additional enhancements without large resource impacts, so this change in the B2B SO procedure delivers no additional value to BAU.</p> <p>With or without implementation, the currently proposed changes do not mitigate against an increase in resources to:</p> <p>respond and resolve on going enquiries from Retailers</p>	<p>The IEC notes the respondent’s comments that:</p> <ul style="list-style-type: none"> <li>• They support removal of unstructured site address</li> <li>• Do not support section and DP number – however this is NSW &amp; ACT specific</li> <li>• Already implemented logic for changes to person name given and changes would incur cost and not benefit Plus ES</li> <li>• Already implemented obligations in regards to coincident SOs</li> <li>• The proposed changes do not mitigate potential increase in resources or risk of customers being left off supply</li> </ul>
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Participant Name	Topic	Question	Comments	IEC response
			rectifying scenarios where customers are inadvertently left off supply due to 'visibility'.	
Vector	2.10 Questions on proposed changes	Question 13: What are the costs and/ or benefits if the proposed changes were not made? Consider the perspectives of process, training, system and customer impacts.	Immaterial	
AGL	2.10 Questions on proposed changes	Question 14: Do you have any other suggestions, comments or questions regarding this consultation? If you have any comments outside of the scope of this consultation, please reach out to your relevant B2B-WG representatives.	None	

Participant Name	Topic	Question	Comments	IEC response
Jemena	2.10 Questions on proposed changes	Question 14: Do you have any other suggestions, comments or questions regarding this consultation? If you have any comments outside of the scope of this consultation, please reach out to your relevant B2B-WG representatives.	<p>Q1) In <i>B2B PROCEDURE: TECHNICAL DELIVERY SPECIFICATION v3.7</i>, will AEMO consider update all reference to AS4590 to AS4590-2020 instead of AS4590-1999 for Address &amp; Telephone AS4590-2006 for BusinessName, and AS4590-2020 for PersonName and related, etc.</p> <p>Q2) In <i>B2B PROCEDURE: TECHNICAL DELIVERY SPECIFICATION v3.7</i>, Table 3 (pg 20) , Item 16, PERSONNAME id "Defines a person's legal name as PER <u>AS4590-1999</u>. See Section 3.5" but in Section 3.5 (pg24), Table 5, the reference are all updated to "<u>AS4590-2020</u>".</p> <p>I suppose Table 3 will need to be corrected to AS4590-2020.</p>	<p>Q1) The B2B WG is reviewing the application of which standard and version is applied to different fields in the Electricity B2B schema usage as the schema does not differentiate which version of the standard is applied – schema is only applied to most current version. The B2B WG is undertaking further analysis of the likely impact of updating to the current standard and will share that work with industry once initial analysis is complete to determine how and when the change should be implemented.</p> <p>Q2) The IEC will update to ensure the references are correct and consistent</p>



Participant Name	Topic	Question	Comments	IEC response
Origin Energy	2.10 Questions on proposed changes	Question 14: Do you have any other suggestions, comments or questions regarding this consultation? If you have any comments outside of the scope of this consultation, please reach out to your relevant B2B-WG representatives.	No Comment	
Vector	2.10 Questions on proposed changes	Question 14: Do you have any other suggestions, comments or questions regarding this consultation? If you have any comments outside of the scope of this consultation, please reach out to your relevant B2B-WG representatives.	No.	

### 5.3 Customer and Site Details Process

Participant Name	Old Clause No	New Clause No	Comments	IEC response
AGL	V3.6.2		AGL Supports the change	The IEC notes the respondent's support for the change.

Participant Name	Old Clause No	New Clause No	Comments	IEC response
AGL	V3.7 – CI 5.5		AGL Supports the change	The IEC notes the respondent's support for the change.

## 5.4 Service Order Process

Participant Name	Old Clause No	New Clause No	Comments	IEC response
AGL	V3.6.2		AGL supports the changes	The IEC notes the respondent's support for the change.
AGL	V3.7 – CI 2.17.1		AGL supports the change	The IEC notes the respondent's support for the change.
AGL	V3.7 – CL 2.18		AGL supports the change	The IEC notes the respondent's support for the change.
Vector		2.18	Don't support the inclusion of this section. Refer to comments in question 7 above.	The IEC notes the respondent does not support the change.
AGL	V3.7 – CI 4.1 (table)		AGL supports the change	The IEC notes the respondent's support for the change.
AGL	V3.7 – CI 4.2		AGL supports the change	The IEC notes the respondent's support for the change.

## 5.5 Technical Delivery Specification

Participant Name	Old Clause No	New Clause No	Comments	IEC response								
PLUS ES	3.4 (e)		<p><i>Remove Unstructured Site Address - This change does not impact the postal address information, which should continue to have the option to be in the unstructured format.</i></p> <p>If the UnstructuredAddress field is to be maintained for postal address, this clause should be amended to remove the required SiteAddressState and SiteAddressPostcode fields. The value of including these fields as a requirement is not evident. Especially, as the UnstructuredAddress field is no longer related to the Site address and the postal address may be in a State other than the Site address.</p>	The IEC notes that the B2B Hub validation requires the Locality, SiteAddressState and SiteAddressPostcode fields provided for a postal address in a CDN unstructured address.								
PLUS ES	3.4 (g)		<p>Remove Unstructured Site Address - This change does not impact the postal address information, which should continue to have the option to be in the unstructured format.</p> <p>PLUS ES proposes the 'Requirement' of this UnstructuredAddress1 field, in Table 4 Address field definition, is changed to 'O' and the comments reviewed to align with the objective of the field.</p> <table border="1"> <thead> <tr> <th>Field name</th> <th>Field Format</th> <th>Optional/ Mandatory or Required</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>UnstructuredAddress1</td> <td>VARCHAR(80)</td> <td>N/M</td> <td>Mandatory if a structured address is not provided.</td> </tr> </tbody> </table>	Field name	Field Format	Optional/ Mandatory or Required	Comments	UnstructuredAddress1	VARCHAR(80)	N/M	Mandatory if a structured address is not provided.	<p>The IEC believe that the N/M is still required to ensure an address is still provided.</p> <p>These unstructured fields should only be used for postal address.</p>
Field name	Field Format	Optional/ Mandatory or Required	Comments									
UnstructuredAddress1	VARCHAR(80)	N/M	Mandatory if a structured address is not provided.									
AGL	V3.6.2		AGL supports the change	The IEC notes the respondent's support for the change.								

Participant Name	Old Clause No	New Clause No	Comments	IEC response
AGL	V3.7 – CL 3.5		<p>AGL supports the change.</p> <p>AGL notes there may be some debate as to whether the correct reference to the Australian Standard is AS 4590-2020 or AS 4590-2017 – Amd1 2020. Regardless of the correct specification for the standard, AGL supports the change to allow single names customers and newer name titles, such as Mx.</p> <p>AGL also notes that the schema does not specify a particular Australian Standard, and therefore always relates to the current standard.</p>	<p>The IEC notes the respondent's support for the change. The IEC will update the reference to the Australian Standard to AS 4590-2017 – Amd1 2020.</p> <p>The B2B WG is reviewing the application of which standard and version is applied to different fields in the Electricity B2B schema usage as the schema does not differentiate which version of the standard is applied – schema is only applied to most current version. The B2B WG is undertaking further analysis of the likely impact of updating to the current standard and will share that work with industry once initial analysis is complete to determine how and when the change should be implemented.</p>

## 5.6 Other Procedures & B2B guide

Participant Name	Old Clause No	New Clause No	Comments	IEC response
AGL			AGL Notes that the B2B Guide does not have a consistent release number linked to the remaining B2B Procedures.	The IEC notes the B2B Guide can be released without linkage to a version of Procedures. In this case the version is linked with B2B procedures version 3.7 and the version number will be updated to 3.7.
AGL	V1.7 – CI 2		AGL Supports the change	The IEC notes the respondent's support for the change.

Participant Name	Old Clause No	New Clause No	Comments	IEC response
AGL	V1.7 - CI 6.1.4.4		AGL Supports the change but suggests that the diagram gets a separate section number – eg 6.1.4.5	The IEC notes the respondent's support for the change and will apply a separate section number.
AGL	V1.7 – CI 8		AGL Supports the change	The IEC notes the respondent's support for the change.
Plus ES			Unauthorised connection process – see response to question 9.	The IEC notes the respondents comment and refers to the response in table 1, question 9.
TasNetworks	Section 8 – Appendix 1		The paragraph that appears below the table should refer to the SO field as "FormReference", not "FormDocumentReference" or "FormDocument".	The IEC will update the paragraph show the SO filed as "FormReference".
Vector		New process flow for Unauthorised Connections	See comments on question 9 above.	The IEC notes the respondent does not support the change proposed in Issue Paper Question 9.