Attachment 2

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

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

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

Assumptions:

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

Audience	Question	Participant Response
Question to Retailers	Do you agree with the assumptions?	Respondents: Origin, Simply Energy, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, EnergyAustralia, SA Power, RED, Shell, AGL, Ergon Energy The question was directed at retailers and most (7 out of 11) agreed with the assumptions. One retailer's response noted their company objective. Non-retailers provided comments (below) mostly without either agreeing or disagreeing. 6 of the participants said yes without comment 1 agrees with basic assumption 1 participant NA 1 participant said no unless DB's are banned from physically disconnecting smart metered sites for move-outs, then they agree assumptions will hold 1 Participant disagrees

Audience	Question	Participant Response
		Comments: • Retailer behaviour is uncertain, some may utilise remote services but some may not. When Vic commenced remoted services some retailers took a number of years before they commenced using remote services • Suggested that AEMO should include a requirement in registration for new retailers to have a remote procedure in place to minimise participants that are unable to request remote service • A number of participants stated the ability of remote services will be subject to the take up of remote metering • If Jurisdictional limits (e.g. proposal from ACT to only undertake manual De-En for DNP_ the assumption on volumes may be flawed • Expects that retailers will prefer to use remote de-energisation and re-energisation services but notes there are likely to be cases where remote de-energisation and re-energisation is not appropriate. We also note that without complementary reforms to Queensland regulation (e.g. Electrical Safety Regulation 2013) changes to the B2B procedures alone will not have the desired effect.
Question to Retailers	Does your business intend to move to the exclusive use of remote service orders (i) in NSW; and (ii) in other NEM states (excluding Victoria)? If yes, how long until you plan to exclusively use remote service orders in each of these states (months/years)?	Respondents: Origin, Simply, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, EnergyAustralia, SA Power, RED, Shell, AGL, Ergon Energy The question was directed at retailers and most (6 out of 11) indicated yes. One retailer's response noted their company objective. The rest indicated using remote where possible as per the comments below. 1 Participant - Has Safety Management Plan accepted by Fair Trading NSW 1 Participant– no exclusive used unless physical services are prohibited 1 Participant– is developing Safety Management Plan for NSW, other states not considered at this time 1 Participant - plans to move to full usage of remote services as the market matures Other retailers suggested all would use remote services where possible however believe there would still be a need for physical de-en/de-en

Audience	Question	Participant Response
		2 retailers suggested it would take years to use remote services in other NEM state (not NSW) 1 Participant - recognises the customer and operational benefits available from remote services and is keen to take advantage of these opportunities in the areas in which we operate. However, the exclusive use of remote de-energisation and re-energisation is not likely due to several factors including safety, consumer preference, availability of communications and meter capability, cost/benefit considerations.
Question to Retailers	Do you currently physically de-energise a site if a customer moves out of a premise where there is a smart meter? If 'no', then please specify why.	Respondents: Origin, Simply, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, EnergyAustralia, SA Power, RED, Energy Queensland, Shell, AGL 3 retailers indicated mostly using physical. The rest indicated where remote is not possible and jurisdictional requirements. 1 Participant– will raise a special read final, or de-en request depending on jurisdiction 2 Participants – disconnects supply on "move out" in Vic only, no in NSW (some awaiting SMP) in other states disconnects on Move out when rules allow e.g. SA, QLD and ACT 1 Participant - Physical de-en for a move out customer depended on the following: • Is the property likely to be occupied soon and/or costs of the physical de-en • Our understanding during our impact analysis of the Remote De-energisation/Re-energisation is that physical de-en for move out customers, especially in certain jurisdictions, were costs prohibitive. • We have been receiving remote de-en SOs since we went live with remote energisations. Granted there are only 3 Retailers currently remotely de-energising customers for move outs due to the NSW FT determinations. 1 Participant - Not specifically on the day of move out although there are occupier processes in place to physically de-energise a site after appropriate notices have been issued, assuming the customer does not sign-up with us or another retailer. 4 Participants – Yes where possible (outside of Victoria) 3 Participants – N/A 1 Participant – offers customers with smart meters where a de-en is required, we will first offer remote services as the most efficient and cost effective option. This does not mean that we will not undertake a physical de-en on move out.

Audience	Question	Participant Response
Question to Retailers	Would you increase use of move out de-energisation if remote services were widely available?	Respondents: Origin, Simply, Next Business Energy, Intellihub, Telstra, Momentum, Nectr, EnergyAustralia, SA Power, RED, Shell, AGL, Ergon Energy Almost all retailers indicated yes 1 Participant – would reassess when jurisdictions approval has been provided 8 Participants – Yes 2 Participants – NA 1 Participant – already standard practise
Question to Retailers	If you intend to move to using remote services, do you intend to remotely de-energise a site if a customer moves out of a premise?	Respondents: Origin, Simply, Next Business Energy, Intellihub, Telstra, Momentum, Nectr, EnergyAustralia, SA Power, RED, Shell, AGL, PLUS ES, Ergon Energy Majority responded Yes. 1 Participant – would reassess when jurisdictions approval has been provided 11 Participants – Yes but note: • In NSW subject to number of other retailers who have approved SMP • Must be completed with regulatory reform to enable remote re-en of premise • Contracting an unknown consumer is a highly administrative and slow process and often leads to a disconnection process being followed, with poor customer outcomes. Having a de-energised site directs the customer to engaging with a retailer for supply, which eliminates the unknown consumer issue. 2 Participants - NA

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

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

Option 1a – Single service order Notified Party proposal

The single service order NP proposal includes that:

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

Assumption:

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

Audience	Option	Question	
Question to DNSPs	Option 1a – Single service order Notified Party proposal	In the above scenario where a meter bypass may occur, is there a better solution that could be identified?	Respondents: Origin, Simply, Next Business Energy, Intellihub, Telstra, Momentum, Nectr, EnergyAustralia, SA Power, RED, Shell, AGL, PLUS ES, Energy Queensland Most responding DNSPs indicated they will not bypass the meter. Two distributors proposed solution was to make it mandatory for the retailer to raise a NP transaction for remote de-en. One distributor proposal indicated making it mandatory for all retailers in NSW need to be able to perform remote services. 5 Participants – NA Comments: • This question is based on the assumption that a DNSP will bypass the meter when an incoming retailer has no Safety Management Plan in NSW and the meter was remotely de-energised. • Multiple participants noted that the meter should <u>not</u> be bypassed if it has been remotely de-energised – this will created other issues e.g. unmetered supply where the MDP will substitute the data ultimately resulting in another site visit to undo the bypass

Audience	Option	Question	
			• Most participants agreed with the following: If we get a call from the customer for 'no supply' then we will check our system to see if a remote de-energisation was done (we expect retailers to inform us of this using the notified party transaction), in which case we would refer the customer to their retailer to arrange the remote re-energisation and if the retailer is not approved to perform remote services then we would expect the retailer will refer the customer to a list of retailers who are approved (this is based on feedback we received from our engagement with retailers). We note the paper states that 'the single service order proposal would reduce significantly the impact on customers and participants'. We disagree with this statement, because it suggests that option 1a would resolve the scenario where a meter bypass may occur. Under option 1a if we received a Notified Party for a remote de-energisation and received a physical re-energisation service order then we will not visit the site and we will respond accordingly in our service order response (as per the B2B Procedure). For this scenario option 1a has the same outcome as our current business practice. To ensure customers get the correct advice and to alleviate any irrelevant truck rolls by the LNSP (and the associated wasted visit fee), one distributor suggests that the procedure makes it mandatory for retailers to send a notified party transaction to the LNSP when raising a remote de-energisation. This will assist with the scenario where a customer calls the LNSP for 'no supply' when the meter is remotely de-energised. • The only scenario where a meter bypass might occur, is if the meter is faulty, preventing the customer from accessing electricity. In this scenario a MeterFault Notification would be sent to the financially responsible Market Participant (FRMP) to action. As a distribution network service provider (DNSP), it is not a standard practice to bypass meters to re-energise as a result of a remotely disconnected premise.
Question to DNSPs	Option 1a – Single service order Notified Party proposal	Would you be willing to receive and make calls/emails to non-regulated MPBs or retailers if you knew the site had been remotely de-energised due to coincident timing?	Respondents: Ausgrid, Origin, Simply, TasNetworks, Intellihub, Telstra, Nectr, Endeavour Energy, SA Power, RED, AGL, PLUS ES, EnergyQueensland Two distributors response indicated 'no' along with some comments. Two distributors response does not answer the question. One distributor would consider it if it is determined to be efficient and effective process. One MPB provided their MPB perspective.

Audience	Option	Question	
			7 Participants – NA 4 Participants – disagree with the following comments: • MPD is the only party that can perform the remote disconnect, therefore MPD should already know (before LNSP) and it would be more appropriate that the MPB inform the retailer. • If NP were not available having the ability to query a DNSP for a De-en SO complete would deliver value if the remote meters are not communicating – save wasted truck visits. The query would have to be automated and near real time to meet the service level agreements and process follow ups by contestable MPs to enable efficiencies of remote service. Any requirements for an automated process to cater for manual BAU processes will make the process inefficient and increase the price point for the service 1 Participant – is not opposed if it can be determined by industry as efficient. They would need to be provided with better understanding of all scenarios and volumes – would also need AER endorsement 1 Participant - systems are designed to obtain a read if we believe the premises is energised. From the back-office, scheduling of work perspective, this change would require system changes to be implemented to capture any re-energisation requests where the DNSP has not performed the de-energisation. If a crew was sent to site and it was established that the premises had been remotely disconnected, the crew would issue the job back in complete, and it would be sent back to the FRMP to action with the meter provider. The automated design of systems makes it hard to stop these jobs going back to the market to have a conversation with the retailers/meter provider, without making further system changes.
Questions to retailers and non-regulated MPBs	Option 1a – Single service order Notified Party proposal	What were the approximate costs associated with the system updates to introduce the NP logic?	Respondents: Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentum, Plus ES, Nectr, SA Power, RED, Energy Queensland, Shell, AGL 6 Participants– included functionality during POC build 1 Participant – NA 5 Participants – have not built for it Comments: • small-medium effort required • one estimated cost of $280,000 (dependant on exact requirements)

Audience	Option	Question	
			• one doesn't believe updates to systems to be material • one sees no reason to invest in an NP solution
Questions to retailers and non-regulated MPBs	Option 1a – Single service order Notified Party proposal	Were these changes complex?	Respondents: Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, SA Power, RED, Energy Queensland, Shell, AGL 5 Participants – No/not complex 3 Participants – hard to determine as packaged with POC/unsure 3 Participants – believe it is complex 1 Participant - NA
Questions to retailers and non-regulated MPBs	Option 1a – Single service order Notified Party proposal	Please provide any additional comments here.	Respondents: Origin, Simply, Next Business Energy, Intellihub, Telstra, Momentum, Plus ES, Nectr, SA Power, Energy Queensland, Shell, AGL 7 Participant – NA/No comment 4 Participant –Endorse/prefer/agree with option 1a Comments: • limited resource availability to deliver changes quickly • IEC agreed to revisit the requirements see snip below
Questions to DNSPs	Option 1a – Single service order Notified Party proposal	Have you already introduced the NP logic in your systems?	Respondents: Ausgrid, Origin Energy, Simply, TasNetworks, Intellihub, Telstra, Momentum, Plus ES, Nectr, Endeavour Energy, SA Power, RED, Energy Queensland, AGL Among the DNSP responses only, one distributor has introduced the NP logic and one distributor has introduced elements of it. 8 Participants – NA 4 Participants – No 1 Participant – Yes 1 Participant – introduced elements, would need additional changes to meet proposal
Questions to DNSPs	Option 1a – Single service order	If no, what is the earliest that you could undertake the upgrade?	Respondents: Ausgrid, Origin, Simply, TasNetworks, Intellihub, Telstra, Momentum, Plus ES, Nectr, Endeavour Energy, SA Power, RED, Energy Queensland, AGL

Audience	Option	Question	
	Notified Party proposal		9 Participants – NA 1 Participant – further assessment, dependant on current activities already in roadmap, could not implement until mid-late 2023 1 Participant – end of Q2 2022 – decision decided by Q4 2021 1 Participant – does not support option 1a however 2023 earliest 1 Participant – would need 9-12 months from date of final determination 1 Participant – June 2023
Questions to DNSPs	Option 1a – Single service order Notified Party proposal	Do you believe the changes to NP logic will be (i) costly, and (ii) complex for your business?	Respondents: Ausgrid, Origin, Simply, TasNetworks, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks, RED, Energy Queensland, AGL Most responding DNSPs indicated yes 9 Participants – NA 2 Participants – difficult to speculate/potentially 3 Participant – Yes Comments: • SO Management module is customised with complex business logic rules incorporate – changes would be high risk and need significant regression testing + new functionality • Not only vendor costs but internal project cost that need consideration • Comparisons of the impact of these changes to retailers and MPB's systems will be misleading if it used to dispute stated DNSP impacts – comparison can only be made if identical end to end system and process solutions are being used • Est cost over $400,000 and update of 3 core systems and interfaces + regression testing
Questions to retailers, non-regulated MPBs and DNSPs	Option 1a – Single service order Notified Party proposal	Given that some participants have built for this solution, whilst others have not, is it a feasible to have this solution included in the B2B Guide as soon as possible, with the	Respondents: Ausgrid, Origin, Simply, TasNetworks, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks, RED, Energy Queensland, Shell, AGL 1 Participant - Ambivalent 7 Participants – Yes Comments: • Prefer it to be mandated in the procedures

Audience	Option	Question	
		procedures to transition in 'x' years?	7 Participants - Disagree Comments: • B2B Guide is non-binding/non-enforceable instrument so don't see any value • Prefer it to be mandated in procedures • No ability to implement in the short term due to current pipeline of work
Questions to retailers, non-regulated MPBs and DNSPs	Option 1a – Single service order Notified Party proposal	If there was a transition period through to this change being adopted in all NEM states (aside from Victoria), at what point should this be?	Respondents: Ausgrid, Origin, Simply, TasNetworks, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power, RED, Shell, AGL, Energy Queensland 4 Participants – minimal transitional period/earliest date possible 2 Participants – 2023 2 Participant – 24 months/2 years 1 Participants – 3 months after final outcome 1 Participant – 12-24 months 1 Participants – preference go-live date for each jurisdiction as remote services become available and short implementation period (e.g. 6 months) 1 Participant – appropriate time afforded 1 Participant – staggered approach 6months from final determination for NSW, then SA, then QLD and TAS. At this stage, only four DNSPs are subject to making these changes (3 NSW and 1 SA) as opposed to other options that would involve 40+ retailers and 8 MCs to further invest in bilateral solutions, which would result in a negative economic outcome for the industry 1 Participant – Contestable MP's don't need transitional period as they can control what they offer to the retailers. Largest MP's have already built NP into their remote service offering.

Option 1b – Two-service order proposal

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

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

Audience	**Option**	**Question**	
Questions to retailers and non-regulated MPBs	Option 1b – Two-service order proposal	Have you built for the two-service order NP logic?	Respondents: Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, SA Power Networks, RED, Energy Queensland, Shell, AGL 9 Participants – no 1 Participant – NA – not yet entered the market but will be ready for two-service order processes or consecutive service order 1 Participant – indirectly built validation rules to confirm status of meter/NMI 1 Participant– no change for service provider 1 Participant– built for coincident checking re-en SO but this approach would see large volumes of unnecessary transactions
Questions to retailers and non-regulated MPBs	Option 1b – Two-service order proposal	If you have built for this logic, what were the approximate costs associated with the system updates to introduce the two-service order NP logic?	Respondents: Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentum, Plus ES, Nectr, SA Power Networks, Shell, AGL 9 Participants– NA 1 Participant – not scoped or costed, but would require all retailers to make system changes and build processes as opposed to 6 Networks making changes to NP processes – high cost on customers 1 Participant – not completed full scope however roughly 500k 1 Participant – low cost, 1 week effort 1 Participant – no cost, but sunk costs from implementation of 1a solution
Questions to retailers and non-regulated MPBs	Option 1b – Two-service order proposal	Were these changes complex? Please provide any additional comments here	Respondents – Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentum, Nectr, SA Power Networks, Energy Queensland, Shell, AGL 6 Participants – NA 2 Participants – changes are complex

Audience	Option	Question	
			1 Participants – sending two services orders is simple, but difficulties arise with coordinating both recipients (and customers) to ensure smooth process 2 Participant– Not complex 1 Participant – no change
Questions to retailers and non-regulated MPBs	Option 1b – Two-service order proposal	Please provide any additional comments here.	Respondents: Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, SA Power Networks, Energy Queensland, Shell, AGL 7 Participant – NA 1 Participant – participant responsibilities and timeframes need to be very clearly defined and understood 1 Participant - 1b not being considered significant change to workflow, exponential increase in transactions, increase in workload 3 Participant – disagree and believe it would be a big impact and risk 1 Participant – variance in distributor response would make logic complex – would need to ensure that all DB's respond identically which may need schema change
Questions to DNSPs and competitive metering providers	Option 1b – Two-service order proposal	Do you currently check the status of a meter and / or NMI status before a truck roll is performed?	Respondents: Ausgrid, Origin, Simply, TasNetworks, Vector, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks 5 Participants– NA 5 Participants – check NMI status but not meter status prior to sending field crew for physical re-en - problem is that MSATS is always retrospective so NMI Status may not reflect recent changes in the field 1 Participants – site visit for every re-en. 1 Participants – Yes, checks the status but doesn't prevent work being issued to the field
Questions to DNSPs and non-regulated MPBs	Option 1b – Two-service order proposal	Do you currently check the status of a meter and / or NMI	The response as before. Two metering parties queried if it is a duplicate question One metering party queried why competitive provider been differentiated to a non-regulated MPB

Audience	Option	Question	
		status before a truck roll is performed?	
Questions to retailers, non-regulated MPBs and DNSPs	Option 1b – Two-service order proposal	Is this solution feasible to introduce?	Respondents: Ausgrid, Origin, Simply, TasNetworks, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks, RED, Energy Queensland, Shell, AGL 11 Participants – Yes Comments • would require clear rules around roles and responsibilities • probably most feasible, more analysis would be needed for costs, timeframes etc • all retailers will need to make changes to their systems and processes • market systems are not real time and not a true reflection of what is happening on site • would need consistent responses from DBs • more costly and take longer to implement and high risk compared to 1a 2 Participants- NA 2 Participants – no Comments • will impact more parties than 1a • will lead to redundant transactions • will become troublesome as smart meters being installed exponentially – compromise data integrity • Impact on AER and internal reports as all parties will have to change reporting logic to identify 'true' re-en/de-en source, plus additional time and increase in data • Retailer requirement to manage a not complete for one or both, increasing transaction and exception volumes • Complexities on ancillary charges at retailers end • Not manageable during contingency process where each SO sent via email

Audience	Option	Question	
			• Doesn't denote industry wide approach and non-cooperation amongst NEM participants • Uncertainty of who to contact if customer reports no power • Inability to inform customer which connection type will be followed
Questions to retailers, non-regulated MPBs and DNSPs	Option 1b – Two-service order proposal	Is it an option to introduce the two-service order NP process (as a transitional step) prior to the introduction of the single NP process?	Respondents: Ausgrid, Origin, Simply, TasNetworks, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks, RED, Energy Queensland, Shell, AGL 3 Participants – Yes Comments: • doesn't require B2B procedure to be updated • would introduce more costs as all parties would need a change 9 Participants – No Comments: • would need to build, option 1a already built • shouldn't be called two-service ode NP process, practically no use of NP field, uses to mutually exclusive SO's with individual responses and no NP logic • unnecessary 2 Participants – would need further assessment/ seems wasteful– why would participants invest time and costs twice? 1 Participant – as market systems aren't real time, don't see the value 1 Participant – unsure why it would be transitional when it is a viable solution
Questions to retailers, non-regulated MPBs and DNSPs	Option 1b – Two-service order proposal	Please provide any comments.	Respondents: Ausgrid, Origin, Simply, Next Business Energy, Intellihub, Telstra, Momentum, Nectr, Endeavour Energy, SA Power Networks, Energy Queensland, AGL 5 Participants – NA/No Comment 1 Participant - Option 1b is a better option than 1a from a customer experience point of view

Audience	Option	Question	
			• We note that option 1b covers the scenario where a physical disconnection is already completed or could not be cancelled and that option 1a does not cover this scenario. 2 Participants - believe that the timeframes for option 1b to be implemented will take longer than implementation of option 1a. 1 Participant- For Retailers who are willing to use this option, it is available to be used at their discretion. 1 Participant - Retailer notes that given notified party transactions are generated in the hub on the AEMO end and are not generated by participants systems, there is an inherent risk in relying on NP to achieve this outcome. Retailer acknowledge that the two service order approach makes the request explicit to the relevant service provider based on the action required and would require almost no system change other than streamlining and automation. 1 Participant - The time to implement the 2 x SO proposal is likely to be longer than for the 6 DBs to make system changes due to the larger number of retailers. There is also the issue of requiring so many market participants to make a change versus 6 DBs making a change.

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

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

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

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

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

Option 2c – SO alert
This option would provide the incoming retailer with an alert when they initially raise a re-energisation service order that would indicate if a de-energisation for the NMI had already been raised and was still open / just completed and which party was processing this SO.

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

Audience	Option	Question	Participant Response
Questions to Retailers	Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a service	Are Options 2a, 2b or 2c viable solutions which will reduce the likelihood of	Respondents: Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, EnergyAustralia, SA Power Networks, RED, Energy Queensland, Shell, AGL 4 Participants - All options are not viable solutions/do not support any of these options 1 Participant– Rules need to be in place to govern the priorities of service orders and responsibilities of all parties

Audience	Option	Question	Participant Response
	Option 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert	coincident service orders?	1 Participant – all 3 options appear viable however cost of 2a and 2c may be prohibitive and not implemented quickly. Option 2b can be quickly implemented. 2 Participant – N/a 1 Participant – could be best achieve by enhancing the timeliness and content with which MSATS status records are updated 1 Participant – all are less efficient than the single SO with NPN 1 Participant – Yes all options would be considering 'viable" although this does not necessarily translate to 'optimal' 1 Participant - since the recipient of any B2B would still need to reply appropriately based on the standing data available, there appears to be limited benefit in this approach. However, option 2c does have some merit and could be useful for a variety of situations relating to churn 1 Participant – • Option 2a is not really viable as one Retailer may be sending their SO, before, during or after then other retailer, and so the chance of the other retailer seeing the SO they need is quite limited, and would require constant checking until the critical window had passed. • Option 2b has limitations in that it assumes the other retailer sends an SO and the MC is made aware of that SO. • Option 2c as described would only work if the de-en SO had been raised prior to the Re-En SO. If the de-en SO is raised after the re-en SO, then this process will fail, perhaps 50% of the time. This is a significant administrative / process burden with the outcome being multiple SOs being sent in many instances. Further, as this is a manual process, the chances of mis-interpretation and mis-communication between Rb and DB operator is much higher. 1 Participant – some of these options (e.g. 2b) are bilateral and can be agreed amongst retailers-MCs to manage the risk. 2b & 2c has potential to reduce risk of coincidence but would require AEMO, 40+ retailers and 8+ MCs to make significant changes. All options are over-engineering and require complete overhaul of retail processes, were rejected by the earlier survey completed by Retailers:

Audience	Option	Question	Participant Response
			Responses collected during November 2020: **Rank 1** **AGL** — Notified Party (A1, B1, C1, D1) **Origin (No rankings provided)** — Two re-ens (A3, B3, C2, D2) **EnergyAustralia (No rankings provided)** — Notified Party (A1, B1, C1, D1) **Simply Energy** — Notified Party (A1, B1, C1, D1) **Red/Lumo** — Notified Party (A1, B1, C1, D1) **Powershop** — Notified Party (A1, B1, C1, D1) **Alinta** — Notified Party (A1, B1, C1+C3, D1+C3) Comments: Option 2a • preference would be that de-en is cancelled – additional questions around B2B hub portal – who managed it? How frequently is it updated? For Origin, customers can sign up digitally, for customer experience to work, an API would need to be enabled • Riskiest of all, especially if no inflight de-en SO in e-hub at time of re-en – common scenario of move in customer contacts retailer on a date after re-en has been arranged by a different retailer • Could potentially reduce coincident SO to a large degree, would be bigger build than NP and more complex, potential integration of B2B and MSATS and more real time build of MSATS, require restricting accesses and determining which is a valid incoming retailer, potentially restricting to re-en/de-en SOs (potential conflict/exposure to bilateral agreements between participants) Anonymity of initiator should also be maintained. Potential to reduce volume of coincident SO depends on solution. What if the re-en SO is cancelled/withdrawn?

Audience	Option	Question	Participant Response
			• Would require real time visibility. Timing would be an issue if the service orders happened to be raised at the same time or within a window of time during which the already raised SO was not visible. We consider that retailers are supporting this option in order to negate the implementation outcomes (i.e. fewer opportunities to retain or save customers) that the policy intent of customer switching rule change/ACCC recommendation. We consider that this option will introduce competition issues. The process also requires manual intervention and would be complex to automate. • Requires reengineering of AEMO's MSATS (B2M) and B2B systems to enable them to interact with each other • Requires interfaces that operate within 'real time' • Requires data updates in MSATS within 'real time' • Timeframe to make this significant change may be longer than other options. • Relies on other retailers to have processed their customer requests accurately and in a timely manner Option 2b • adding an MC alter adds additional complexity and cost. Origin would prefer additional transactions being created • This should have been asked of MC's as well as they would need to make system and process changes. Using MC's to signal back to retailer, for retailer to send another SO to DSNP is inefficient when DSNP receives same transaction • Dependency of NP to be built by retailers. Does not eliminate timing issues. Non-equitable – pleace the burden on the contestable MP, possibly requiring the MPB to also built for new transactions. Increasing the response timeframe. Additional costs to provide the services – cost recovery. Potentially Multiple break points in E2E process. • Would require real time visibility. Timing would be an issue if the service orders (re-en and de-en) happened to be raised at the same time or within a window of time during which the already raised order was not visible. Or if the re-en was accepted by the MC and subsequently a physical de-en raised. This option sees additional steps being brought in, with a service order going out and then coming back to the retailer to re-raise (ie: Remote re-en raised by the retailer is returned and requires a physical re-en instead). Making this process complex to automate without any manual intervention - leading to additional costs for retailers, as well as resources from the increase in AHT due to the introduction of additional exception handling.

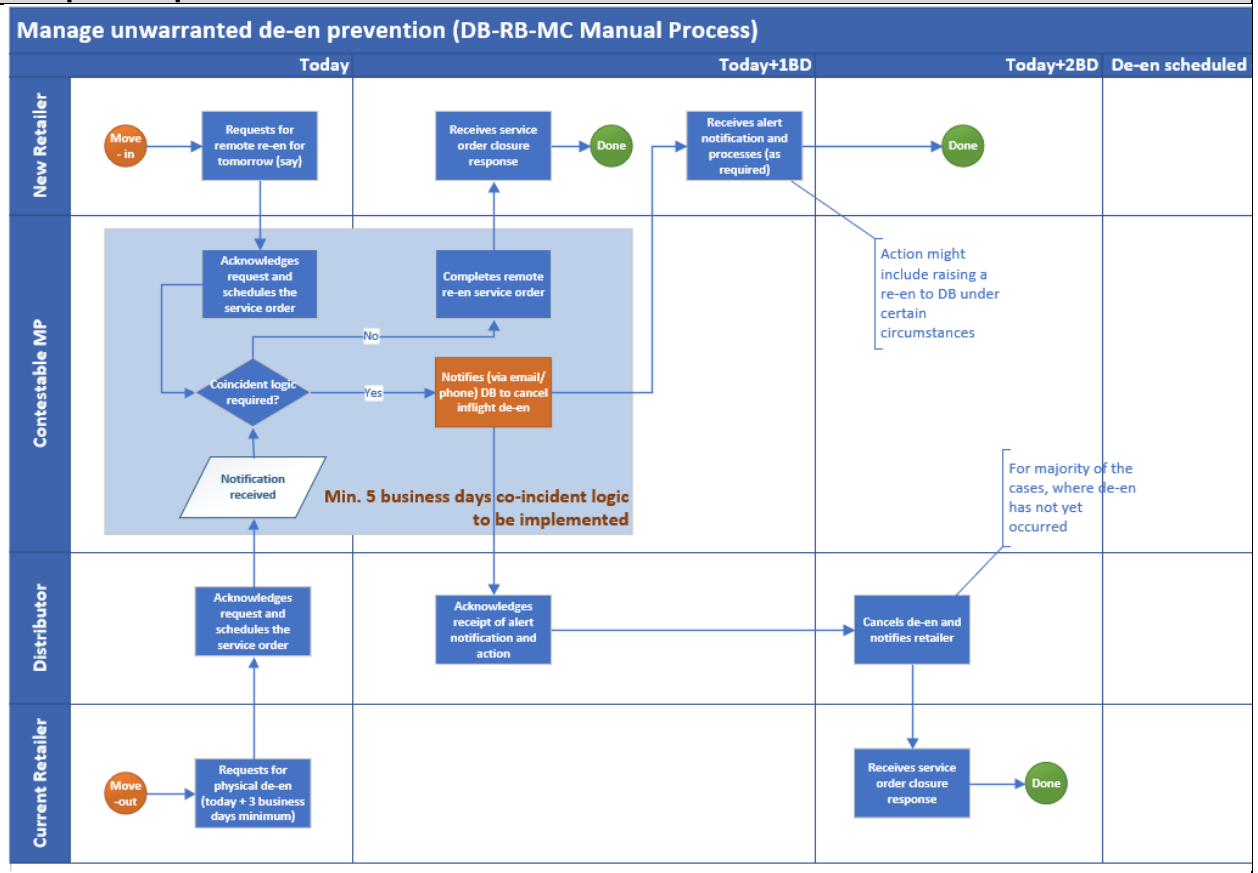
Audience	Option	Question	Participant Response
			• Would only work if all retailers used NP transactions and notified the correct parties Option 2c • Can AEMO please clarify who created the alter and the role of each participant following the alert • Timing issue would not necessarily prevent a SO being actioned. Mitigated potential issues but has a reliance on the operational processes of the retailer, potentially not resolving downstream impacts to service providers. • This solution relies on the management of exceptions and re-raising a second service order in order to get the customer re-energised. In turn, this will lead to additional costs for retailers, as well as resources from the introduction of new exceptions. This solution would not be viable in times of contingency where SO's may need to be raised manually. This solution creates risks because there is a lack of responsibility associated with the alert as to which party needs to manage / action the alert. • Doesn't make sense? Do not see why a de-en (raised by outgoing FRP) would be actioned if the customer has already transferred to a new FRMP)
Questions to Retailers	Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a service Option 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert	Are there any potential contractual issues with this solution for working with multiple non-regulated service providers?	Respondents: Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentun, PLUS ES, Nectr, EnergyAustralia, SA Power Networks, RED, Energy Queensland, Shell, AGL 1 Participant – No 2 Participant – Yes 1 Participant – 2b Commercial agreements would need to be put in place for MC's to perform the task 1 Participant – non identified – may be an additional cost to change agreements 2 Participant – N/A 1 Participant – has not included these options as part of the agreements with non-regulated service provided but will work with providers if this option is selected. However, does not think this option is best suited as its too onerous on the Service Providers 2 Participant – Unknown 1 Participant – Rules need to be in place to govern the priorities of Service Orders and responsibilities of all parties 1 Participant – doesn't support, and has not explored the contractual obligations and any issues 1 Participant - as long as participants operate using the procedures there shouldn't be any operational issues.

Audience	Option	Question	Participant Response
			However, pricing and invoicing would become the next pain point and a standardised approach to invoicing between industry parties should be investigated in order to streamline that aspect of the fully deregulated market 1 Participant – • 2A It is unclear how this would work if it is not through the AEMO B2B bub, in which case no contractual issues should occur. If this issue is to check with MCs, then given the number of checks that would be needed for each NMI (multiple checks as you would have to check each day for someone else's SO which may have gone to the DB) then this would have to be made into a transaction which all retailers would have to build and all MCs would have to build, which is not cost effective or meets the Objective of the NER or NERR. 2A If this process is manual, then all the issues relating to labour costs, misinterpretation, miscommunication continue to exist and these costs are all borne by retailers and MCs. If this process is not standardised for industry usage, then implementation would require complex contractual negotiations, which might have inconsistent outcomes across MCs and retailers. • 2B If this process is not standardised for industry usage, then implementation would require complex contractual negotiations, which might have inconsistent outcomes across MCs and retailers. This also assumes that the MC is aware of the second service order. This also places a higher burden on one participant (the MC) to manage processes associated with other retailers and Service providers. • 2C It is assumed that this implementation is through the AEMO B2B hub, so no contractual issues, but quite severe technical limitations as described above. Again, this would also have implications on generating notices to current retailers on actions associated with customer churn ahead of churn completion. Comments: • Contacted parties have clauses for operation to the market rules and non-contracted parties are bound as participants to operate to the market rules • All parties need to operate to the rules and if they do then contracts are not required • there are potential contractual issues because it relies on each retailer and MC to have a bilateral, non-standard, and manual processes agreed amongst each other, that are not governed by the IEC procedures, especially 2b and 2c. This could be a significant issue and if not addressed by the IEC in a timely manner, could cause regulatory consequences due to inconsistent and adverse customer

Audience	Option	Question	Participant Response
			outcomes. These options are tabled due to the non-cooperation of DNSPs to implement Option 1a, which is the most optimal and easiest to implement solution. • Yes – not the only reason not to progress the option – could be best achieved by enhancing the timeliness and content with which MSATS status records are updated
Questions to Retailers	Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a service Option 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert	Is this process something that you could introduce within your business?	Respondents: Origin, Simply, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, EnergyAustralia, SA Power Networks, RED, Energy Queensland, Shell, AGL 1 Participant – benefit in exploring in further detail 1 Participant – none of these options require DNSP to make any change to their processes, causing the other two parties to undertake manual workarounds and additional changes 2 Participant – Yes 1 Participant – could introduce but significant time and resource constraints 1 Participant – yes but limited benefit 3 Participant – NA 2 Participant – No 1 Participant – Do not support 2a and 2c Comments : • Will add cost to industry • It's unclear what obligations are required at this stage • With current scope, we believe it may result in possible delays for the customer • Best achieved by enhancing the timeliness and content with which MSAYS status records are updated • The risks and costs associated with these options, as described above makes these options not viable to introduce, especially when there is a more reliable solution present - a solution that requires one SO, does not delay the process to re-energise or de-energise a site, and would require little to no additional manual involvement. • For option 2a, it is unclear which party would maintain the data in the B2B hub. This could complicate efforts to get the right result. Under option 2b, we believe that the MPB could only alert a retailer if the service order has been raised correctly. This means there is still a chance of gaps in the process. As highlighted above, option 2c does not appear to be solving a problem as such. • Option 2a- High administrative burden for retailers, especially small retailers. Also, as the alert may arrives / be detected at the last minute, there may be no way of reversing an SO issued by another

Audience	Option	Question	Participant Response
			retailer. Finally, a single check prior to issuing an SO would be inadequate, as many are future dated (preparation for move in) and the de-en SO is likely to be sent after the re-en SO is sent. Thus, ongoing checking would be required. Option 2b - Additional administrative burden for retailers and MCs, especially small retailers. Also, as the alert may arrives / be detected at the last minute, there may be no way of reversing an SO issued by another retailer. To be effective new transactions would need to be developed so processes can be automated and managed efficiently. Option 2c - Assuming this is a technical solution, then transactional processes would be needed to manage this, although the cost benefit for a partial solution may not be worthwhile. Again, the issue with alerts is that they may arrive such that there is no time to issue a reversing SO, leaving an off supply to be dealt with.
Questions to Retailers	Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a service Option 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert	Which option is more viable (Option 2a, 2b or 2c)?	Respondents: Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentum, Nectr, SA Power Networks. RED, Energy Queensland, Shell, AGL 1 Participant – 2a 3 Participants - 2b 1 Participant - 2c 7 Participants – NA/no 1 Participant – • Option 2a - Not seen as viable as it only deals with some outcomes and creates multiple sub-processes which are considered to have reduced successful outcomes. • Option 2b - Not seen as viable as it only deals with some outcomes and creates multiple sub processes which are considered to have reduced successful outcomes and relies on a second party manage the 3rd and fourth parties activities. • Option 2c - This option is not seen as viable as it only deals with some outcomes and creates multiple sub processes which are considered to have substantially reduced successful outcomes. • Also, it can be argued that if changes are to be made to the central B2B hub, then the processing and management of all coincident re-en/de-en SOs could be managed by the AEMO hub, with both retailers simply sending a de-en SO and a re-en SO, with the hub managing the specific requirements to the relevant service provider. Comments:

Audience	Option	Question	Participant Response
			• Not sustainable unless DNSPs play a role in one of these. A trilateral agreement is essential where three parties are involved for a single site (NMI) • 2b - no formal B2B mechanism available for the MC to signal the presence of conflicting SO's back to the retailer. If this was to become the industry agreed solution, then a new transaction would be required. All retailers and all MPB's will need to build systems and processes to generate and consume this transaction. This approach seems much more expensive than Option 1A which does not need any schema changes or new b2b transactions. • 2b – NP roles in SO would need to be made mandatory to be successful – more info on how the 'alert' from the MC would work in practice
Questions to Retailers	Option 2a – New permission rules - retailers to check for inflight service order requests before requesting a service Option 2b - Retailers rely on an MC to alert them of the presence of two Service Orders for move-in / move-out scenarios Option 2c – Service Order alert	Do you have any other feedback relating to Options 2a, 2b or 2c?	Respondents: Origin, Simply, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, NEctr, EnergyAustralia, SA Power Networks, RED, Shell, AGL 4 Participants – NA/no comment Comments: • Current version of 2a would require MC to detect a coinciding physical de-en, notify current retailer, current retailer to process this email and cancel physical de-en, DNSP to action SO cancellation. This is a very inefficient process because it involves too many hoops before DNSP takes an action. • Retailer proposes another version of 2b (which is similar to Option 3b), that involves DNSPs to also play a proactive role in the process, as below. It minimises 'hand-off' points and results in better efficiency, i.e., when a MC detects a coinciding physical de-en, it notifies the DNSP directly and DNSP withdraws the inflight de-en.

Audience	Option	Question	Participant Response
			 • All options presented under option 2 appear more expensive to implement for AEMO, retailers and MPB's (approximately 45 participants) than requiring six DNSP's to simply process transactions that they already receive (option 1a). It is difficult to see the arguments for solutions that require new market transactions (formal consultations and B2B schema changes) and the development of new processes and systems by retailers and MPB to work around the DNSP who can simply process a transaction they already receive. As regulated businesses DNSP receive

Audience	Option	Question	Participant Response
			guaranteed cost recovery for industry changes whereas retailers and contestable metering providers do not. • Retailer considers that 2b can be implemented by MCs without systems changes • There is no requirement for retailers to be passive and they can choose whether to send one or two service orders. What is described as the active management of coincident service orders is merely the requirement that service providers comply with the B2B procedures. • Retailer does not think these options are possible to be adopted without significant operation and cost implications. • Should option 2a be used as the preferred solution to this problem, we suggest strong consideration be given to other possible uses for this functionality to avoid rigid implementation. • We are concerned that the MC are not maintaining the LS registers like an LNSP and that will bring in more complication. When a new customer registers it is not recorded by an MC. • These options are not viable and create too many risks for customers and retailers. • Overall these options seem complicated compared to those forming part of option 1. • Option 2a - The substantial cost of implementation and requirement to constantly check in flight SOs is not considered a viable option without substantial automation, which is unlikely to be viable for many small retailers. • Option 2b - The substantial cost of implementation (including transactions) which is not considered a viable option without substantial automation, and relies on the MC being included in the process, which may not happen. • Option 2c - The substantial cost of implementation (including transactions and automation) which is not considered a viable option for the limited number of successful outcomes.

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

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

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

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

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

Audience	Option	Question	
Question to DNSPs	Option 3a – Phone call to DNSP (LNSP) by a competitive metering provider prior to attending site	Would the DNSPs (LNSPs) be open to receiving a call (enquiry) from a non-regulated MPB before it attends a site to confirm if the LNSP has performed a physical de-energisation?	Respondents: Ausgrid, Origin, Simply, TasNetworks, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks, RED, Energy Queensland, AGL 8 Participants – N/A (retailers) 3 Participant – Do not support 1 Participant – Would need to assess the impact on regulated revenue allowances- expects any fees associated would need to be recovered per service 1 Participant – not opposed to consideration if determined by industry as efficient and effective Comments: • Option 3a introduces a manual industry process when an existing B2B transaction, which can allow for automation, could be utilised. The MPB is entitled to receive a Notified Party when the FRMP requests a physical de-energisation. Therefore, we suggest a more

Audience	Option	Question	
			effective and efficient solution is for the MPB to be informed of a physical de-energisation via a Notified Party transaction. We understand that most FRMPs are already sending the MPB a Notified Party when they request for a physical de-energisation and that there is no issue with this approach. • This option would only be feasible if a retailer sent a re-en SO to the MPB and: Meter was not communicating and The MPB had not remotely de-energised the meter. Does not resolve the current gaps • To confirm any commitment to this activity, we would need to be provided with a better understanding of all the scenarios where interaction would occur and the expected volumes of these interactions. A clear understanding of the work volume is critical (if the process was to proceed) because we would need to ensure that the ongoing operational cost required to support this process are supported by the AER as part of our Regulatory Reset allowances – AER endorsement would be an important step prior to the commencement of this activity. • Given the volume of re-energisations and de-energisations in Queensland, this option would increase call volumes considerably to retailers. This could potentially impact other calls being managed daily.

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

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

Audience	Option	Question	
Question to DNSPs and non-regulated MPBs	Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation	Would the DNSPs (LNSPs) and non-regulated MPBs be open to this process?	Respondents: Ausgrid, Origin Energy, Simply Energy, TasNetworks, Vector, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks, RED, Energy Queensland, AGL 6 Participants – NA (retailers) 5 Participant – Do not support 1 Participant (not DNSP) – supports as an interim measure, quicker turn around to withdraw pending de-en instead of waiting for B2B 1 Participant (DNSP) – open to this as an option but would require system changes as e-en and de-en is automated. This option would be inefficient and unreliable as it would be a manual process and reliant on other coincident SO processes being in place Comments • Option 3b introduces a manual industry process when an existing B2B transaction, which can allow for automation, could be utilised. • The FRMP know that they can cancel a pending physical de-energisation by raising a service order with an action type of 'cancel'. • An incoming retailer knows that they can also cancel a pending physical de-energisation, as per the coincident rules defined in the B2B Procedure, by raising a re-energisation service order. In addition, the re-energisation service order from the incoming retailer will also ensure that the supply is re-energised where the pending physical de-energised could not be cancelled. • Both of these are existing market processes that are working well • Would require extra back office resources to make phone calls to the network to cancel physical SO as system is already fully automated • Email is possible but would DNSP's/Retailer accept an email to cancel a SO? How is this different to a NP transaction sent from the retailer to the DNSP? Giving the Contestable Service providers

Audience	Option	Question	
			the authority to cancel a SO request sent to the DNSP raised by a retailer via email seems a dangerous precedent which is sure to lead to disputes. Potential liability issues exist. Don't support this. • How will the contestable MC know that there is a pending physical de-energisation? This would only be available to the MC if the FRMP has nominated the MC as a notified party in their physical de-energisation request to the LNSP. If that is the case, the MC would be happy to make a to the LNSP to request the status of the physical de-energisation request, but we will not be in a position to request the LNSP withdraw their action since we were not the initiator of the request. • does not want to be responsible for making a determination on behalf of the retailer SO for action; we do not have visibility to the conversations that have transpired prior to the raising of the SO. This option has a dependency on the MPB receiving a NP for the de-en SO – still presents a gap. Or is the intent there would be a combination of measures to close the gap?It does not cater for the following scenario - the MC receiving the remote de-en and the DNSP receiving the Re-en SO? – DNSPs are going out to bypass the meters. This process places the burden on one participant – the 'burden' of the solution should be equitable across participants. It requires additional build and resourcing for the MPB . We do not support any processes which would incorporate manual processes as part of actioning automated remote services. • we believe this would impose significant manual effort and likely to lead to disputes with Retailers.
Question to DNSPs and non-regulated MPBs	Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation	Could this be implemented immediately?	Respondents – Ausgrid, Origin Energy, Simply Energy, TasNetworks, Vector, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endavou Energy, SA Power Networks, RED, Energy Queensland, AGL 7 Participants – NA

Audience	Option	Question	
			7 Participant – no Comments • This cannot be implemented immediately because the B2B Procedure will need to be updated to allow for another participant, who was not the initiator, to cancel a service order they did not raise and to have a new response code so it can be clearly communicated why the physical de-energisation was cancelled. • As some work would be required to change the system to automatically generate the Email and this would need to get priority and scheduled within our program of work. We don't support the phone call due to the costs related to back office resources. • Whilst we do not support option 3b, if it gets adopted then we believe that this cannot be implemented immediately because the B2B Procedure will need to be updated to allow for another participant, who was not the initiator, to cancel a service order they did not raise and to have a new response code so it can be clearly communicated why the physical de-energisation was cancelled. • Due to system automation requirements to be changed, not in a position to implement this immediately
Question to DNSPs and non-regulated MPBs	Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation	Is a phone call or email process preferred?	Respondents – Ausgrid, Origin Energy, Simply Energy, TasNetworks, Vector, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks, RED, Energy Queensland, AGL 7 – NA 1 Participant – email 1 Participant – follow current cancellation B2B process 1 Participant - While email is possible it is not a preferred solution.

Audience	Option	Question	
			DNSPs' can simply run a report to see NP transactions that have arrived and can then manually cancel SO's. Contestable Service providers don't need to tell something to a DNSP that they already know. 3 Participant – Do not support 2 Participant – Phone call
Question to DNSPs and non-regulated MPBs	Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation	What might the gaps be in this approach?	Respondents: Ausgrid, Origin Energy, Simply Energy, TasNetworks, Vector, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks, RED, Energy Queensland, AGL 7 Participants – NA 1 Participant – Do not support Comments • Yes, option 3b has a gap. Option 3b does not covers the scenario where a physical disconnection is already completed or could not be cancelled. In this scenario, option 3b will need to be enhanced so that the MC notifies the incoming retailer and then the incoming retailer raises a physical re-energisation service order. • There is no guarantee that the physical de-en could be cancelled, no different to today. • This solution will have the same problem as the NP transaction. i.e. timeliness may mean the physical SO cannot be cancelled in time. • As above, the MC is not the initiator of the request to physically de-energise the site and therefore would not have the authority to request the LNSP withdraw their action. • This option has a dependency on the MPB receiving a NP for the de-en SO – still presents a gap. • It does not cater for the following scenario - the MC receiving the remote de-en and the DNSP receiving the Re-en SO? – DNSPs are going out to bypass the meters. Who is supposed to call whom?

Audience	Option	Question	
			• As the current solution would require a system change, it is suggested that prior to implementation, coincident service orders would still occur. For example, a crew will go to a site for a read and, dependent on the timing of the MPB sending the email, it could result in the job already being completed/not completed, prior to the email. Furthermore, additional gaps could be around areas such as the MPB having knowledge/visibility of the DNSPs pending SO, determining whether a physical De-energisation could be withdrawn if a truck roll had occurred, but the physical action had not, etc.
Question to DNSPs and non-regulated MPBs	Option 3b – Phone call or email to DNSP (LNSP) by a contestable MC to withdraw pending physical de-energisation	Is the non-regulated MPB the most appropriate party to make the phone call, or should the call come from the retailer?	Respondents – Ausgrid, Origin Energy, Simply Energy, TasNetworks, Vector, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, SA Power Networks, RED, Energy Queensland, AGL 6 Participants – NA 1 Participant – Doesn't support Comments • If 3b is adopted then we believe the incoming retailer should contact the DNSP. Although an incoming retailer should not be able to cancel a service order raised by another retailer, the incoming retailer is responsible for the re-energisation and therefore can request for a physical re-energisation. This request for the physical re-energisation will, as per the B2B Procedure, cancel the pending physical re-energisation. However, we note that a B2B transaction already exists for this scenario, therefore we suggest the B2B cancellation SO transaction be used as opposed to the email or phone call • retailers play a middle-person role and it prolongs the process of withdrawing a de-en, especially if it has been detected by the MC • To align with the NERR it would be necessary that the retailer who raised the physical de-en contacts the DNSP. Then there would

Audience	Option	Question	
			be no need for a call/email to the DNSP at all, just initiate a service order cancellation. • The contestable Service Provider is not the appropriate party to communicate to the DNSP to cancel a SO raised by another party. The party who raised the SOR should be the party to cancel it. • The retailer should own the accountability of mitigating the de-en SO. Remote energisation agreements – do not factor in workarounds etc. The contestable MPB will need an avenue for cost recovery. • Whilst we do not support option 3b, if it gets adopted then we believe the incoming retailer should contact the DNSP. Although an incoming retailer should not be able to cancel a service order raised by another retailer, the incoming retailer is responsible for the re-energisation and therefore can request for a physical re-energisation. This request for the physical re-energisation will, as per the B2B Procedure, cancel the pending physical re-energisation. However, we note that a B2B transaction already exists for this scenario, therefore we suggest the B2B transaction be used as opposed to the manual phone call. • If the retailer has sent the request, it would seem appropriate that the retailer was the one making the call to the DNSP to cancel their B2B. It is viewed that it may be more appropriate for the call to come from the retailer prior to sending the remote services request to the MPB • As a retailer, this only considers the option that the SO has yet to be completed. If the de-en SO is completed, the retailer would need to raise a re-en SO, which requires manual intervention in the first instance (high cost) followed by processes (which would need transactions) to alert the Retailer and automation to send the re-en SO. Further, with any manual process, the issue of min-interpretation and miscommunication is much higher.

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

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

Audience	Option	Question	
Question to all participants	Option 3c - Reducing the number of business days to update MSATS NMI status and meter status fields	Do you support the reduction from five to two business days to update the MSATS NMI status and meter status fields?	Respondents: Ausgrid, Origin Energy, Simply Energy, TasNetworks, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour, Energy Australia, SA Power Networks, RED, Energy Queensland, Shell, AGL 3 Participant – Do not support 9 Participant – Support 1 Participant – no comment Comments • We do not support reducing the time to update the NMI Status field from five to two business days. In most cases we already update the NMI status within one business day, however there are some scenarios where we require more time due to the nature of the work or exceptions that requires manual review. Therefore, we believe that option 3c does not provide the benefit as suggested but there will be inadvertent impacts that will require costly process re-engineering to comply with the tighter timeframe. • supports this proposal however it will not resolve the coincident Service Order issues and would recommend option 1a to be implemented ASAP to resolve the issues. Moreover, MSATS is updated overnight, so regardless of two business days SLA, MSATS would still be one day behind in providing up-to-date information.

Audience	Option	Question	
			• Not opposed to this but not sure it is necessary. Regardless of the time to update MSATs it can never reflect the true status until MSATs becomes more real-time. We currently raise the CR to change meter status in MSATS immediately after the remote services SOR is executed, so this is expected to be reflected in the market within 2 days already (normally overnight). I suspect that DNSP processes already update NMI Status within a few days to the site being physically disconnected. AEMO could perform some analysis to see what impact this change would have. i.e. if 95% are already being updated within a few days then the change will have no effect and seems a waste of resources to go through a consultation. • does not see how a reduction to 2 business days reduces / removes the risk of customer off supply. • supports at a minimum, the reduction to 2 bus days. Given the progression of technology and the near real time services which can or could be provided the industry needs to move to processes and market tools to support near real time activities. • It should be same day or at the latest next day. • some reservation with this suggested change. In general, we would achieve an update of NMI status within 2 business days and we do not delay the updating of the NMI status because rule obligation provides a longer timeframe, however, there may still be some scenarios that require the current 5 business days (e.g. where the work is in Remote SA) and would require flexibility in the obligation to support these scenarios. • MSATS should be updated as soon as possible, and reflect the actual status in the field. The quicker the time frame is better, however, we acknowledge there will always be exceptions (illegal reconnections etc).

Audience	Option	Question	
			• This is generally a positive change and should be supported. The original 5 days arose when DB processes relied on paperwork and were manual. A DB and MC should be able to meet this target.
Question to all participants	Option 3c - Reducing the number of business days to update MSATS NMI status and meter status fields	If the update period is reduced, should the coincident period window (also five days) be reduced or remain at five days?	Respondents – Ausgrid, Origin Energy, Simply Energy, TasNetworks, Vecto, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, EnergyAustralia, SA Power Networks, RED, Energy Queensland, Shell, AGL 9 Participant – Remain at 5 days 1 Participants – Shorten 1 Participant – Same day/next day if NMI status is to be updated 1 Participant – no comment Comments • If 3c gets adopted then we do not support reducing the coincident period window. The intent of the coincident period window is to define the period when two conflicting service orders are deemed a co-incident. Reducing the coincident period window will increase cost to customers for little benefit. This is because there will be less coincident service orders and it means the de-energisation and re-energisation work will need to be performed at a cost to customers. A better correlation to the coincident period window is how quickly an incoming retailer becomes the FRMP in MSATS – if updating the FRMP in MSATS can be shorten then we could review the coincident period window. This is because a co-incident due to an incoming retailer can only exist during the transitional period when a retailer takes on responsibility for a NMI and when the market system is updated to reflect this responsibility. • Timing should be aligned • MSATS is not used to validate NMI status before raising a re-en, because it may or may not be accurate at the time of raising a re-

Audience	Option	Question	
			en. This issue would still exist, unless MSATS is made 'real-time' which is not in scope/within IEC's remit. • Shortening this period will result in less 'coincident' SOR being cancelled and the Networks having to do more visits and will only increase costs to retailers • We note that this question is based on the assumption that option 3c gets adopted. Whilst we do not support option 3c, if it gets adopted then we do not support reducing the coincident period window. The intent of the coincident period window is to define the period when two conflicting service orders are deemed a co-incident. Reducing the coincident period window will increase cost to customers for little benefit. This is because there will be less coincident service orders and it means the de-energisation and re-energisation work will need to be performed at a cost to customers. A better correlation to the coincident period window is how quickly an incoming retailer becomes the FRMP in MSATS – if updating the FRMP in MSATS can be shorten then we could review the coincident period window. This is because a co-incident due to an incoming retailer can only exist during the transitional period when a retailer takes on responsibility for a NMI and when the market system is updated to reflect this responsibility. • There is no reason or benefit to change the coincident window to align it with the MSATS update window. Reducing the coincident management window would only lead to more off supply events and increase the number of field visits required by industry, as the overlaps between Move out and Move in work reasonably well within a 5 business day period. Not only is this not an efficiency gain, but is an efficiency reduction, which would not meet the objectives of the NEO or NERO.

Additional Questions

Audience	Question	

Question to all participants	Do you have a preferred option of those that have been presented in this paper?	Respondents: Ausgrid, Origin Energy, Simply Energy, TasNetworks, Vector, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Nectr, Endeavour Energy, EnergyAustralia, SA Power Networks, RED, Energy Queensland, Shell, AGL
		
		• Option 3(b) as the most suitable response to address the issue in the required timeframe. This option is implementable immediately and has the effect of continuing the current priority for customer 'on supply' where conflicting orders exist. Adopting this option now would allow for processes, such as the current review of the metering framework, to be completed and identify structural changes required.
		• Yes, we prefer option 2c.
		  • Major factors in our consideration are the customer experience, cost of the solution, robustness of the solution and alignment to roles and responsibilities.
		  • We note that the objective of this paper is to identify an effective solution to prevent the customer having no supply. Although there are several scenarios to consider, the main scenario is where there is a change in retailer for a NMI that has a smart meter, the incoming retailer requests for a remote re-energisation and the FRMP requests for a physical de-energisation, and these requests can be raised in any order.
		  • We considered each option individually and as presented. Some of the options could complement another option but we did not consider combination of options due to the limited time provided for this survey.
		  • We believe that an option that does not fully meet the objective of preventing the customer having no supply should be given a lower weighting. We also believe that any option

Audience	Question	
		that introduces unnecessary manual steps, especially if existing market transactions already exist for that manual step, should also be given a lower weighting. • We wish to highlight that for an option to fully meet the objective of preventing the customer having no supply, the option must cover the scenario where the DNSP has already performed the physical disconnection or was unable to cancel the physical disconnection. On this basis we believe a valid option will need to include steps where an incoming retailer can request the DNSP to perform a physical re-energisation, and if we do not want to make significant changes to existing industry practices in this area then it would mean the incoming retailer raising a physical re-energisation request to the DNSP. • Based on the above we prefer option 2c. In addition, we also support options 1a, 1b and 2b as an interim solution, but we do not support options 2a, 3a, 3b and 3c. • Option 1a with Option 3a, b and c appear to be a viable short and longer term fix. • Option 1a: this is the cleanest option and probably most cost effective as it provides a centralised mechanism to manage coincident events leveraging existing system capabilities. • We strongly support 'Option 1a – Single service order Notified Party proposal'. It is the most viable, cost effective, customer centric, and efficient solution. • Notified Party transactions would be our preference and is the simplest approach. • Notified parties implementation was developed during PoC implementation to minimise the number of DB wasted truck visits, where a customer may call a DB fault line when they were off supply due to a remote service. This requirement does not cease when remote services are fully implemented, and would be

Audience	Question	

		required for every remote de-en undertaken to ensure the DB is alerted to the remote service.
		• Prefer Option 1a
		• Metering party's preferred option, NP becomes mandatory for re-en and de-en SOs and both SPs build for the logic to coincident check for both, SO and NP received. This would ensure an equitably distributed process between the 3 participants of the energisation equation to ensure a customer is not incorrectly disconnected.
		Retailer: must incorporate NP for energisation SO
		DNSPS and MPBs : must build to coincident check SO and NPN In all 3 participant roles, there are those who have already delivered the capabilities and then there are those who will have to deliver part or all of the proposed solution. Additionally, to drive further mitigations MSATS applicable CRs for updating the meter status and the NMI status should be near real time updates or at minimum overnight updates as opposed to the current process. For example, CR3050 to update meter status to D must update next day in MSATS CR2050 to update NMI status to D next day in MSATS.
		• 3c + 1a would be the most possible option. Although should we be removing consideration for implementation cost & time across all participants, 3c + 2a would be the preferred.
		• Yes, we prefer option 2c.
		  ○ Major factors in our consideration are the customer experience, cost of the solution, robustness of the solution and alignment to roles and responsibilities.
		  ○ We note that the objective of this paper is to identify an effective solution to prevent the customer having no supply. Although there are several scenarios to consider, the main scenario is where there is a change in retailer for a NMI that has a smart meter, the incoming retailer

Audience	Question	
		requests for a remote re-energisation and the FRMP requests for a physical de-energisation, and these requests can be raised in any order. ○ We considered each option individually and as presented. Some of the options could complement another option but we did not consider combination of options due to the limited time provided for this survey. We believe that an option that does not fully meet the objective of preventing the customer having no supply should be given a lower weighting. We also believe that any option that introduces unnecessary manual steps, especially if existing market transactions already exist for that manual step, should also be given a lower weighting. We wish to highlight that for an option to fully meet the objective of preventing the customer having no supply, the option must cover the scenario where the DNSP has already performed the physical disconnection or was unable to cancel the physical disconnection. On this basis we believe a valid option will need to include steps where an incoming retailer can request the DNSP to perform a physical re-energisation, and if we do not want to make significant changes to existing industry practices in this area then it would mean the incoming retailer raising a physical re-energisation request to the DNSP.Based on the above we prefer option 2c. In addition, we also support options 1b and 2b as an interim solution, but we do not support options 1a, 2a, 3a, 3b and 3c. • MC to follow existing LNSP obligations for managing SO. • One participant believes that a solution that puts the decision making and control with the party who is responsible for the initiation of the Service Order is the best solution.

Audience	Question	
		We therefore feel that "2c – SO Alert" should be the solution that is pursued. This solution – •Provides the relevant Retailer with full visibility of active Service Orders. •Enables the Retailer to make decision on when to cancel a Service Order directed to the wrong Service Provider – where time allows. •It also enables the Retailer to promptly raise a new Service Order to the correct Service Provider – which if raised by the Retailer in a timely manner, will achieve the same outcome as the 1a Notified Party transaction solution but will greatly reduce any delays in the completion of any Re-connections (depending on timings, it may remove the need for the customer to make further contact with the Retailer to alert them that supply is not available – a current known gap with option 1a solution options). We also believe that AEMO have incorrectly listed the DNSP and Non-reg MPB as affected Participants for this solution.
Question to all participants	Are there other viable solutions that have not been presented in this paper? If so, please describe.	Respondents – Ausgrid, Origin Energy, Simply Energy, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Endeavour Energy, EnergyAustralia, SA Power Networks, RED, Energy Queensland, AGL, PIAC 8 Participants – NA/No comment/none identified 1 Participant - Allow service orders to be 'reassigned', so that a re-energisation could be issued from the FRMP to the MP and then the MP could reissue the work to the DNSP if that is appropriate. Allow the 'Update' transaction type for B2B for participants to modify details of existing requests where new information is discovered/required for a job to be completed

Audience	Question	
Question to all participants	Do you have any other comments you would like to provide?	Respondents – Origin, Simply, Next Business Energy, Intellihub, Telstra, Momentum, PLUS ES, Endeavour, EnegyAustralia, SA Power Networks, RED, Energy Queensland, Shell, AGL 6 Participants – NA/No comment • One participant believes Option 3c should proceed regardless of agreed approach for managing coincident service orders. • Since a number of retailers have gained approval from NSW Office of Fair Trading to commence remote re-en/de-en services, no standard solution has yet been implemented in the industry to manage coinciding service orders, despite lengthy discussions at industry forums (B2BWG) for last 18 months. Retailer believes it's a matter of time before a coinciding service order off-supply situation occurs. As such, Retailer suggests AER to be engaged by the IEC to flag this contentious issue as early as possible, in order to provide transparency on this matter and potential customer detriment. • At a minimum, the SPs should have access to the necessary information since the accountability of the customer supply status end state sits with them. If the basic '101' is not available in procedures certain participants will not undertake any additional steps. Experience has shown that even when procedures outline an obligation/requirement, participants try to interpret the obligation for least impact to themselves not necessarily to meet the objective of the requirement and/or for the best outcome of the end user. Metering Party wants as much information as possible to mitigate the downstream impacts. Any solution which requires a break from automation, which remote energisations deliver, increase the likelihood of failure points and increase the burden on the said participant. There is a reliance of all 3 parties undertaking the expected actions and/or using information available to them to mitigate down stream impacts. For example,

Audience	Question	
		The same FRMP who has issued a de-en SO sending the re-en SO to the incorrect participant. A DB relying solely on the receipt of a NPN which is not a mandated field before rolling trucks out to bypass remotely de-energised meters. They are not checking the meter status which has been updated to D a minimum of 5 bus days prior to the bypass. Instead they are placing the blame squarely on the retailer for not providing a NPN. • We wish to highlight that the retailer is responsible for arrange the re-energisation for the customer, therefore solutions that allow the retailer to meet their regulatory obligations and customer commitment is important. The root cause of the issue is that the incoming retailer does not have a solution to confidently know who to send the re-energisation request to – if they did then retailers can then manage their obligation and customer commitment in an efficient manner. We should not conflate the retailer's obligation to appropriately arrange the re-energisation with a service provider's obligation to manage coincident service orders. That is, we should avoid options that do not address the root cause otherwise we risk introducing an inefficient or complex industry processes are introduced. For example, option 2c addresses the root cause because it focuses on providing the incoming retailer the visibility so that they can take appropriate action. This is the reason why we prefer option 2c. However, although options 1b and 2b delivers the right outcome, they are inefficient and complex processes because it does not address the root cause and instead pushes the issue further down the industry process. This is the reason why we only support options 1b and 2b as an interim solution. • Life Support registration and MS needs to maintain the registration details of sites they are responsible for. On the odd occasion where there has been a human error and a notified party has not been sent, networks (in particular one distributor) have

Audience	Question	
		been very quick to raise complaints about not having received a NP. Especially in instances where we have raised a remote energisation. Off the back of these complaints, we have introduced a more systematised trigger for the notified party transaction. We question whether the whole process for coincident service orders is a matter of the representatives attending the B2BWG not having spoken to their business about the use of NPs and this has been a massive waste of time. Further, we note that networks, in particular two distributors, either are or have made significant changes to their operating systems (for upgrades not just for regulatory changes). Giving this, we question why this opportunity has not been flagged or even taken up. • None of these options address the root cause of the issue which is a complicated process whereby remote & physical disconnections are not possible on the same meter. Further, the Safety Management Plan process with NSW Fair Trading is slow and onerous, which acts as a barrier for retailers and Metering Coordinators (MCs) to using remote services. In addition to any solution implemented, Retailer considers there would be real benefits in AEMO working with the NSW Government to focus on how to get more retailers and MCs accredited to undertake remote services. Simplifying the process would be one major way to increase the number of accredited parties. Rather than requiring each retailer to have a Safety Management Plan with each MC it intends to use, we see that a system similar to Victoria's would be more beneficial. In Victoria retailers enter into a memorandum of understanding (MOU) with Energy Safe Victoria which specifies the processes and plans it has in place to manage electrical safety around re-energisation. Metering Coordinators do the same. Once this has been done any retailer with an MOU safety plan can work with any MC with an MOU. This approach drastically reduces the

Audience	Question	
		administrative cost and burden compared to having to develop individual agreements between each retailer and each MC. • The existing prioritisation of consumer 'on-supply' is a necessary consumer protection measure, helping to ensure that consumers 'connection to an essential service is maintained. The impact of this prioritisation must be retained in implementing processes to deal with coincident service orders where remote de-energisation and re-energisation processes are available. It is not considered appropriate to assume rapid and universal adoption of remote de-energisation and re-energisation by retailers. The slow rollout of advanced metering and jurisdictional differences in the sanctioning of remote processes mean coincident service orders are likely to continue to be an issue for some time. The potential for significant impact and consumer harm through de-energisation in error requires adoption of a consistent approach that can be implemented as a matter of urgency. Our review of the existing B2B procedures and processes indicate that there is no need for any change either the procedures or processes. There is a need for a Retailer to be clear about what it is seeking to active and in the communication of that requirement to all of the relevant market participants involved. There are several occasions where coincident serve orders will occur. They are 1. Two retailers send the same service order (re-en) to the same service provider (DNSP or MP) 2. Two retailers send the same service order (re-en) to different service provider (DNSP and MP) 3. Current FRMP sends de-en to a Service provider (DNSP or MPB) and one or more retailers send the opposite service order (re-en) to that same service provider (DNSP or MP)

Audience	Question	
		4. Current FRMP sends de-en to a Service provider (DNSP or MPB) and one or more retailers send the opposite service order (re-en) to a different service provider (DNSP or MP) In case 1 there is no consumer impact as the service provider simply executes the re-en requested. There is no problem in case 2 having both service providers ensure the site is energised cannot have a negative outcome fort the consumer. Likewise, there is no problem in case 3 as the service provider ignores the de-en as required by the procedures and executes the re-en. The discussion paper is only really addressing the situation where the current FRMP sends contemporaneously, or previously, a De-en to a different service provider than the prospective retailers sends the re-en. It is worth investigating how this might come about. At the moment the prospective retailer has limited information about the current energisation status of the prospective customer. The only information available to the prospective retailer is MSATS NMI status (set by DNSP) and Meter DataStream status (set by MPB). Unfortunately, this data may be up to 5 days old and does not include any information about other pending changes to status. In such circumstances the prospective retailer has two choices: 1. Send a re-en to both service providers (DNSP and MPB); or 2. Attempt to make an informed choice as to which service provider the service should be requested from, recognising that if this is incorrect there may be a delay in the re-energisation of the site and negative customer impacts. While the first option should have no negative customer impact regardless of current or pending NMI or data stream status, this

Audience	Question	
		unfortunately not always true. There are several potential negative outcomes from this option. First, it is not clear how a service provider should respond to a re-en request where the service is already energised and expected to be so on an ongoing basis. This should be clarified so that there is a consistent approach across all service providers. Secondly some service providers could choose to charge for a service provision (and even at times incur unnecessary costs associated with the service) even though no service has been provided nor is required. In our view these things should occur (and indeed should have been part of the roll out of the market procedure changes) and accordingly there shouldn't be a requirement for any significant investment to achieve this. Likewise, we consider all retailers (given the clear uncertainty as to potential energisation status) should be considering sending two service orders or being prepared for the potential delay associated sending only one. In our view, neither of the suggestions in the discussion paper address these issues appropriately. In our view there is a need to improve the requirement to maintain accurate and timely NMI Status and Meter Status, including visibility to any potential activities so as to remove the uncertainty which is preventing retailers from identifying the appropriate service provider to whom the Service Order should be sent. Regardless of what can be or is done in relation to the B2B Procedures improvements in customer outcomes can only be achieved by changes to the CATS Procedures to require accurate, reliable and timely data of both the physical and remote energisation status of customer connections, including any pending Service Orders which might impact those statuses.

Audience	Question	
		The treatment of concurrent Service Orders, so as to avoid contradictory instructions from being implemented, are already appropriately dealt with by the B2B procedures and the MSATS CATS Procedures associated with pending transfers which prioritise to maintain service to customers over de-energising. While improving the speed of updating status information would be helpful, the compliant application of the B2B procedures and the CATS procedures, in particular the application of the key principle that “customers interests take priority” by all service providers should mean that the issues that the discussion paper seeks to address should not be occurring.