# Energy Queensland Submission on the B2B Procedures V3.4

# **Draft Procedures**

Energy Queensland Limited 11 March 2020



#### **About Energy Queensland**

Energy Queensland Limited (Energy Queensland) is a Queensland Government Owned Corporation that operates businesses providing energy services across Queensland, including:

- Distribution Network Service Providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy);
- a regional service delivery retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- affiliated contestable business, Yurika Pty Ltd (Yurika), which includes Metering Dynamics Pty Ltd (Metering Dynamics).

Energy Queensland's purpose is to 'safely deliver secure, affordable and sustainable energy solutions with our communities and customers' and is focused on working across its portfolio of activities to deliver customers lower, more predictable power bills while maintaining a safe and reliable supply and a great customer service experience.

Our distribution businesses, Energex and Ergon Energy Network, cover 1.7 million km<sup>2</sup> and supply 34,000GWh of energy to 2.25 million homes and businesses each year.

Ergon Energy Retail sells electricity to 738,000 customers in regional Queensland.

Energy Queensland also includes Yurika, an energy services business creating innovative solutions to deliver customers greater choice and control over their energy needs and access to new solutions and technologies. Metering Dynamics, which is a part of Yurika, is a registered Metering Coordinator, Metering Provider, Metering Data Provider and Embedded Network Manager. Yurika is a key pillar to ensuring that Energy Queensland is able to meet and adapt to changes and developments in the rapidly evolving energy market.

#### **Contact details**

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## **1** Introduction

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its B2B Procedures V3.4 Consultation. This submission is provided by Energy Queensland, on behalf of its related entities Energex Limited (Energex), Ergon Energy Corporation Limited (Ergon Energy), Ergon Energy Queensland Limited (EEQ) and Yurika Pty Ltd (Yurika).

Energy Queensland broadly supports the Draft Procedures and offers the following comments on each specific process.

### 1.1 Technical Delivery Specification

Energy Queensland notes that the meter data transaction group of MTRD transactions are already being sent from 1MB files that have greater than 1000 transactions. However, we suggest that this limit is updated to a larger volume of transactions, for example, 5000, to cater for the increased file size. In addition, Energy Queensland suggests that the timing of implementation is reviewed to bring in line with the 5 Minute Settlement (5MS) changes related to Business to Market (B2M) file size updates.

### 1.2 Service Order Process

Energy Queensland accepts the proposed changes to the Metering Service Works (MSW) service orders may assist with communication of requirements in some situations and support the changes in conjunction with the 'Optional/Not required' option in order to make the bilaterally-agreed usage of these fields clearer. In addition to required system and process changes we note that application of these new fields will require participants to review/update agreements in relation to the use of the new MSW transaction fields as well as application of the 'Optional/Not required' element.

Energy Queensland supports the proposed approach to require all participants to take the associated aseXML schema update for this change (i.e. removing the 'n-1' approach). However, we note that the effective date of these changes is currently set to 10 November 2021, approximately 5 months after the Go Live date of the non-contestable unmetered load (NCONUML) is published to market. We also note that schema changes and related system changes / testing will be occurring during a period of significant other change activities, which places a high demand on resources required for development and testing. As such, we suggest the timing of this implementation is reconsidered to allow the market to use these transactions from the transition period in the 5MS Global Settlement (GS) project.

#### 1.3 One Way Notification Process

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

Energy Queensland's preference would be to utilise the 'PIN' One Way Notification to notify participants of meter exchange dates. This would be preferable as we currently have systems and processes in place to use this transaction to advise retail partners of changes to scheduled dates for MSW and would only require minor changes to extend the application of this transaction. Currently we do not utilise (initiate) the Meter Fault and Issue Notification (MFIN) for meter exchanges and would require more involved system and process changes to adopt usage of this transaction.

We note the new clause 4.2.3(b) requires participants to complete the ServiceOrderID and seek clarity on which Participants and under what circumstances this is required.

#### 1.4 Customer Site Details Notification Process

Energy Queensland has no further comments on this draft process.

#### 1.5 Meter Data Process

Energy Queensland has no further comments on this draft process.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact either myself on (07) 3851 6793 or Barbara Neil on (07) 4432 8464.

Yours sincerely

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