B2B Procedures

- Customer and Site Details (version change)
- Service Order
- Meter Data (version change)
- One Way Notification
- Technical Delivery Specification

CONSULTATION - First Stage

CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Vector Metering

Completion Date: 23 December 2019

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1. Service Order Process

Participant Name	Old Clause No	New Clause No	Comments
Vector Metering	Table 13		Suggest Reg classification should be expanded to include 'Shared Fuse' as this is likely to have new timeframes introduced by the MC Planned Interruption rules consultation — e.g. 30 Business days; RegClassification VARCHAR(40) Use to indicate whether it is customer Initiated and regulatory timeframes apply, or not. • Customer Initiated • Malfunction • New Meter Deployment • Shared Fuse • Other
Vector Metering	Table 13		Suggest PurposeforVisit should include a 'replace existing metering' for completeness. PurposeforVisit VARCHAR(40) Use to clearly indicate the purpose of visit – allowable values will be provided in an enumerated list: New connection, Additional Meter, Part of BTS Temp to Perm, Part of supply alteration, Solar Upgrade, Relocate existing meter; Replace existing metering; Bypassed Customer Other

2. One Way Notification Process

Participant Name	Old Clause No	New Clause No	Comments
Vector	4.1.3		Support the includion of SO ID in the CSV payload
	4.2.1		Support the inclusion of SO ID in MFIN but question if MFIN or PIN should become XML transaction to support meter exchange notification.refer to response to Issues paper questions.Note: Vector currently uses MXN to support meter exchanges;

3. Technical Delivery Specification

Participant Name	Old Clause No	New Clause No	Comments
Vector	5.4.1(c)		Unclear where section 1.1.1.1 is in this procedure. This reference is repeated in 6.4.1.(d) step 5 and step 11. (c) Where a Recipient's Inbox contains an invalid ase:MessageAcknowledgement(s) or invalid standalone ase:Event(s), the Recipient can still initiate Transactions by lodging ".zip" files into their Inbox (refer 1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.
	5.8(a)		ase:MessageAcknowledgements. This will eventually result in the flow control limit being exceeded if the exceptable part resolved Vector does not support implementing any transaction volume based limit in the MTRD message group. We note that there is evidence that today participants routinely send and receive messages with over 1000 transactions contained within.

4. Vectors response to issues paper questions:

Question 1: Do you support the changes detailed in section 5.1.1? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason") – Yes

Question 2: Are there additional enumerated fields whose addition to the Metering Service Works SO the IEC should consider? Please detail them.

Question 3: Do you support the changes detailed in section 5.1.2? (Answer should be one of "Yes" / "No" / "Other – provide reason") Yes

Question 4: Do you support the changes detailed in section 5.1.3? (Answer should be one of "Yes" / "No – provide reason" / "Other – provide reason")

Yes

Question 5: Given that the MFIN, which is XML-based, can be used for the same purpose as the MXN and avoids the issue related to partial acceptance of the MXN, do participants support the continued usage of the CSV-based MXN?

Having multiple transactions for the same purpose introduces complication to the change process. i.e. any change requested to one transaction should be made to the other transactions used for the same purpose. We support a review of the use of the MXN and its retirement but recommend that consideration of the PIN transaction as a replacement – rather than the MFIN. It has come to our attention that other participants currently use the PIN transaction over the MXN or MFIN. We believe the use of PIN would avoid the confusion that is likely in using the MFIN for purposes other than faults and issues.

Question 6: If the MXN were to be retired, would your organisation prefer Option 1 or Option 2 as presented above?

Option 2 - Sunset clause;

Question 7: If the MXN were to be retired, what would be the appropriate timeframe in which to retire it?

Depends on the implementation date of the v3.4 procedures. If the Industry decides that v3.4 should be effective in Dec 2020 then MXN can be grandfathered until Nov 2021, otherwise it should be when v3.4 become effective (Nov 2021).

Question 8: Will a 10 MB maximum file size for MTRD transactions cause substantial problems for your organisation?

No

Question 9: Does limiting the number of transactions within the MTRD group mitigate the potential problems caused by an increased maximum file size?

No – Don't support a transaction volume limit for the MTRD.

Question 10: Is the volume limit of 1000 transactions per file appropriate for the PMD and VMD transactions?

No – Do not support a transaction limit for the PMD or VMD. Current 1MB file can contain more than 1000 transactions. Systems and processes should be designed and built to handle any number of transactions that come in a 10MB file. Vector notes that it should be rare that there would be high volumes of PMD requests as this would indicate a consistant and material issue in meter data delivery (the trigger for the Provide Meter Data request in the first instance).

Question 11: Does your organisation have any concerns about the cost or business risk associated with the above changes? If so, please specify which change in particular concerns your organisation and why.

No – These changes are urgently needed to help resolve inefficiencies for Retailers and contestable metering providers that are caused by the inadequancy to the current B2B transactions. While this consultation includes changes that alter the structure of existing B2B transactions, these changes have been designed to minimise impact on participants who choose not to use these. This is achieved by making all new fields optional, and by purposely not prescribing a process around their use so that participants can agree to take advantage of these new fields as the see fit.

Question 12: If your organisation raised concerns in the above question, what alternative less-costly solutions might meet the requirements for the changes outlined in section 5?

Not applicable

Question 13: If one or more of the changes proposed in this document were to be adopted, would your organisation prefer an implementation date of 2 December 2020 or November 2021? 2 December 2020. Vector accepts that industry currently has a number of change programs underway which require resourcing, however we note that the only industry change with <u>firm</u> requirements is the 5 Minute and Global settlement program and these changes have a scheduled go-live date of July 2021 and Febuary 2022 respectively. All other changes are either early in the Rules consultation, have not had implementation dates set or, given the information available will not have any impact on B2B. This consultation represent the first efficiency change implemented in the three years since POC go-live. A further deferral until November 2021 would represent an

unacceptable delay imposed upon the contestable metering providers who are currently working with processes that are diffecult to automate and are error prone, under a more stringent regulatory framework than that was in place at the commencement of POC. Vector does not see a case for delaying this consultation past December 2020. Vector notes that the deployment program for 2021 and 2022 already has changes scheduled (5MS and Global Settlements go-lives) and believe that a November 2021 date is likely to be more disruptive than December 2020.

Question 14: Do you see value in the development of new Verify Standing Data Transactions? If "No": Not for contestable metering providers.

Question 15: Please provide reasons why you do not see value in the development of a new Verify Standing Data transaction.

- The issues raised in the description in the proposed transaction appear related to standing data that the network is responsible for. If retailers and Networks agree that this is necessary then this is fine but not for contestable MP's and MDP's;
- Issues related to standing data are usually complex in nature and cannot be convey without direct engagement between businesses;

If "Yes":

Question 16: What areas of Standing Data are causing you issues today (please list individually)?

• There is a need for AEMO to provide an education piece for retailers about which roles are responsible for which elements of standing data. Today MP's and MDP's receive requests about incorrect standing data which we do not have any responsibility for. This is the bulk of the communications we receive about correcting standing data.

Question 17: Who is involved in the interactions to resolve the issue (e.g. Retailer to Distributor – please list and link to each data item from Question 14)?

Not applicable

Question 18: What are the volumes of each type of Standing Data item (please list and link to each data item from Question 14)? Not applicable

Question 19: To resolve the issue, is there a need for multiple interactions between parties to gain a full understanding of the issue and agree the resolution (please list and link to each data item from Question 14)?

Not applicable

Question 20: If pursued, which B2B Procedure should these new transactions be included within? Not applicable

Question 21: Do you have any further information/thoughts that would be relevant to this topic (please provide)? No;