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: Simply Energy

Completion Date: 13th January 2020

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0. Example Submission (Please delete this section)

General Instructions

1. *Please keep information in the clause numbers simple - eg no titles, comments etc. – put titles and text in the comment section.*

2. *Please use a individual row for each comment on any each clauses.*

3. *Old clauses only needed if there is no equivalent clause within the revised draft procedures.*

4. *If an obligation exists in another instrument please identify the instrument and clause to assist in including guidance notes.*

5. *Please only include comments either with suggested changes, issues or support. Please do not include 'No Comment'.*

6. *See example below (please note the "comments" are sample only, they bear no relevance to the proposed changes):*

Participant Name	Old Clause No	New Clause No	Comments
	1.42(a)	2.15(a)	Service Order response Change response list from varchar(250) to an enumerated list
	1.42(a)	2.15(a)	Suggest add 'Other' as part of enumerated list and add free text to support other
		2.25(a)(ii)	Table 5 "Description of use" should be reworded to "Description of typical use"
		3.6(a)	The MDP SLP (c 3.5.2) requires the meter serial ID to be provided. Suggest the MeterSerialID be added to the transaction.
		3.6(a)	Ensure MeterserialID is the same field used in other procedures
		2.15	Ensure character length for MeterSerialID matches MSATS field length

1. Service Order Process

Participant Name	Old Clause No	New Clause No	Comments
Simply Energy	Section 4	Section 4	Newly added key with "AO = Agreement Only (May be provided with agreement of the Recipient. If provided without agreement may be ignored)" is not warranted. Suggest we keep this as 'O = Optional (may be provided and should be used by the Recipient if provided)' as it covers the overarching principle of agreement, being a part of B2B Procedures.
Simply Energy	Section 4.1	Section 4.1	Supports all new fields except *PurposeforVisit* as this can be complex/difficult for training due to potential overlaps. Some of the suggested enumerations are an overlap that need to be addressed, e.g. relocate existing meter enumeration is same as 'move meter' subtype, new connection is same as new meter deployment, etc. Suggest we either remove this as a standalone field and merge it with other relevant fields where appropriate, e.g. RegClassification, etc.
Simply Energy	Section 4.1	Section 4.1	Two more reasons to be considered for visit: - Multi-occupancy - Battery/VPP connection

Participant Name	Old Clause No	New Clause No	Comments
Simply Energy	Section 4.1 and Section 2.8	Section 4.1 and Section 2.8	While the new field 'Escalation indicator' is proposed to designate the level of escalation / urgency, it doesn't necessarily help if the 'Transaction Priority (as defined under High, Medium or Low in the Techincal Delivery Specification), and as a fully tagged aseXML Transaction, this will be sent as Medium Priority regardless of the payload. Hence we suggest this needs to be reviewed and section 2.8 be amended to include the following: 2.8. Delivery Priorities 'High Priority' ServiceOrderRequests are defined as (a) same day or next day Re-energisations or cancellations of same day Re-energisations or De-energisations. (b) where the 'Escalation' field of a Service Order Request is anything except Normal (default)'

2.   One Way Notification Process

Participant Name	Old Clause No	New Clause No	Comments
Simply Energy	4.1.3 Meter Exchange Notification	4.1.3 Meter Exchange Notification	Do not support any change to MXN
Simply Energy	4.2.3 MeterFaultAndIssueNotification Data	4.2.3 MeterFaultAndIssueNotification Data	Supports the change to include SOID in MFIN

3. Technical Delivery Specification

Participant Name	Old Clause No	New Clause No	Comments
Simply Energy	5.8. Size of aseXML Messages	5.8. Size of aseXML Messages	Supports 10MB Message Size Limit for MTRD however the 'Limit on number of transactions in Message' to be more than 1000 as we've already seen more than a 1000 PMD transactions compressed in a 1MB file (about 1400 transactions) and hence to minimise the impact, we suggest 2000 transactions to be the upper limit instead.

4. Response to Questions in Issues Paper

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")

Simply Energy's response: Supports all except *PurposeforVisit* as this can be complex/difficult for training due to potential overlaps. Some of the suggested enumerations are an overlap that need to be addressed, e.g. relocate existing meter enumeration is same as 'move meter' subtype, new connection is same as new meter deployment, etc. Suggest we either remove this as a standalone field and merge it with other relevant fields where appropriate, e.g. *RegClassification*, etc.

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

Simply Energy's response: Two more to be considered:

- Multi-occupancy
- Battery/VPP connection

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

Simply Energy's response: 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")

Simply Energy's response: 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?

Simply Energy's response: No, we prefer a cleaner suite of transactions, hence any redundant transactions should be reviewed and cleaned up as we progress.

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

Simply Energy's response: Option 1, retire the MXN as part of the updating of the MFIN.

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

Simply Energy's response: Not sure, this will be participant-specific as participants who wish to stay on current schema might still be able to use it even if new schema no longer have this transaction.

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

Simply Energy's response: No

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

Simply Energy's response: Yes

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

Simply Energy's response: No, as we've already seen more than a 1000 PMD transactions compressed in a 1MB file (about 1400 transactions) and hence to minimise the impact, we suggest 2000 transactions to be the upper limit instead.

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.

Simply Energy's response: No risks as such, however the cost of implementation is not yet fully determined. Provided the benefits will outweigh the cost, we support the changes.

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?

Simply Energy's response: Bilateral or bespoke solutions, which is beyond the scope of B2B Procedures anyway.

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?

Simply Energy's response: 2 Dec 2020, in conjunction with Reduced Customer Switching Timeframes changes.

Question 14: Do you see value in the development of new Verify Standing Data Transactions?

Simply Energy's response: No

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

Simply Energy's response: After carefully reviewing the changes, we understand that MSATS Standing Data Review (MSDR) might have overlaps on this proposal. We suggest deferring the VSD transaction once MSDR is finalised.

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

Simply Energy's response: N/A

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)?

Simply Energy's response: N/A

Question 18: What are the volumes of each type of Standing Data item (please list and link to each data item from Question 14)?

Simply Energy's response: N/A

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)?

Simply Energy's response: N/A

Question 20: If pursued, which B2B Procedure should these new transactions be included within?

Simply Energy's response: N/A

Question 21: Do you have any further information/thoughts that would be relevant to this topic (please provide)?

Simply Energy's response: As per our response in Q15