
NTESMO
Communications Guideline
and MSATS Procedures v1.0

18 November 2022

Final Report and Determination

Proposed Changes

Initial adoption of the Communications Guideline and Market Settlements and Transfer Solution Procedures in the Northern Territory Electricity Market

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Executive Summary

Date of Notice: 18 November 2022

The publication of this Final Report and Determination (Final Report) concludes the Northern Territory National Electricity Rules (NT NER) consultation process conducted by NTESMO in respect of proposed initial adoption of the following documents and procedures:

- NTESMO Communications Guideline
- NTESMO MSATS Procedure – CATS Procedure Principles and Obligations
- NTESMO Standing Data for MSATS
- NTESMO Meter Data File Format Specification NEM12 and NEM13
- NTESMO B2B Guide
- NTESMO B2B Procedure Service Order Process
- NTESMO B2B Procedure Customer and Site Details Notification
- NTESMO B2B Procedure Meter Data Process
- NTESMO B2B Procedure One Way Notification Process
- NTESMO B2B Procedure Technical Delivery Specification

The draft report was published on 9 September 2022 detailing the proposed changes.

NTESMO received four submissions from Retailers, Local Network Service Providers (LNSPs), generators and the Utilities Commission.

NTESMO has identified the following material issues, based on these submissions, as well as NTESMO's own analysis:

- Inconsistencies with the Electricity Retail Supply Code
- Additional Business to Business Transactions introduced to the NTEM
- Life Support Processes

NTESMO has additionally made the following changes to the procedure documents:

- Minor amendments to correct formatting and typographical issues

Accordingly, NTESMO's Final Determination amends the Package Documents in the form published with this Final Report. NTESMO proposes that the amended Package Documents will come into effect in line with the effective dates published in the documents of 2 October 2023.

1. Stakeholder Consultation Process

NTESMO consulted on the proposed adoption of the Communications Guideline and associated MSATS and B2B procedures in accordance with the Rules Consultation Procedures in clause 8.9 of the NT NER, as required by clause S7A.1.3 of the NT NER.

NTESMO's timeline for this consultation is outlined below. Additional sessions were held with each participant, as required, to inform them of the consultation documents.

Deliverable	Date
Issues Paper published	30 June 2022
Submissions due on Issues Paper	8 August 2022
Draft Report published	9 September 2022
Submissions due on Draft Report	11 October 2022
Final Report published	18 November 2022

The publication of this Final Report concludes the consultation process and presents NTESMO's response to the feedback received.

2. Background

2.1 NT NER requirements

NTESMO is responsible for the establishment and maintenance of a Communications Guideline specified in S7A.1.3 of the NT NER.

The Communications Guideline authorised by NTESMO under Chapter 7A must be established and amended by NTESMO in accordance with the Rules consultation procedures.

2.2 Context for this consultation

NTESMO has developed the Changes to improve the functionality and efficiency of information exchange transactions between the NTEM participants. The Changes were developed by NTESMO.

In summary, the Changes are to:

- Adopt the version of the Communications Guideline attached to this Final Report
- Adopt the use of the AEMO MSATS system for information exchange transactions within the NTEM
- Adopt the procedures as detailed below for managing information exchange transactions via the AEMO MSATS system
 - NTESMO MSATS Procedure – CATS Procedure Principles and Obligations
 - NTESMO Standing Data for MSATS
 - NTESMO Meter Data File Format Specification NEM12 and NEM13
 - NTESMO B2B Guide
 - NTESMO B2B Procedure Service Order Process
 - NTESMO B2B Procedure Customer and Site Details Notification
 - NTESMO B2B Procedure Meter Data Process
 - NTESMO B2B Procedure One Way Notification Process
 - NTESMO B2B Procedure Technical Delivery Specification

The relevant effective date for all the documents is 2 October 2023.

2.3 First stage consultation

On 30 June 2022, NTESMO issued a Notice of First Stage Consultation and published an Issues Paper and initial draft procedure documents. This information is available on NTESMO's website.

The Issues Paper included a summary of the proposed changes.

In response, NTESMO received 3 submissions. NTESMO also held one meeting with Jacana Energy on 16 August 2022.

NTESMO has published copies of all written submissions (excluding any confidential information) on NTESMO's website.

2.3 Second stage consultation

On 9 September 2022, NTESMO issued a Notice of Second Stage Consultation and published the Draft Report along with the draft amended procedure documents. This information is available on NTESMO's website.

The Draft Report included a summary of the proposed changes.

In response, NTESMO received 4 submissions of which one was a late submission.

NTESMO has published copies of all written submissions (excluding any confidential information) on NTESMO's website.

3. Summary of Material Issues

The key material issues are as follows:

No.	Issue	Raised by
1.	Inconsistencies with the Electricity Retail Supply Code	Jacana Energy
2.	Additional Business to Business Transactions introduced to the NTEM	Jacana Energy
3.	Life Support Processes	Utilities Commission

A detailed summary of the issues raised by Consulted Persons in submissions, together with NTESMO’s responses, is contained in **Appendix A**.

4. Discussion of Material Issues

4.1 Inconsistencies with the Electricity Retail Supply Code

4.1.1 Issue summary and submissions

The Communication Guideline proposes a new method of information exchange for the NT market participants. This is inconsistent with the current information exchange rules contained with the Electricity Retail Supply Code. Participants are concerned with having two sets of regulations in force at the same time and managing compliance with two differing sets of regulations.

NTESMO is actively working with the Utilities Commission on preventing the situation arising of two sets of regulations being in force at the same point in time. NTESMO detailed, in the Draft Report, a proposed mitigation strategy if the scenario occurred of two sets of regulations being in place at the same time.

In response:

- The Utilities Commission stated they are working towards publishing a revised Electricity Retail Supply Code by the end of 2022 to address this situation and support removing a duplication of regulations
- Power and Water accepted the mitigation strategy
- Jacana Energy expressed concerns on the effectiveness of the mitigation strategies proposed for managing the potential risk of having two conflicting sets of regulations in force at the same time. If the risk mitigation strategy has to be implemented Jacana Energy requested an industry wide group be established to manage the risk mitigation plans

4.1.2 NTESMO's assessment

NTESMO notes that the Utilities Commission published a Draft Decision Paper dated 31 October 2022 which aligns the Electricity Retail Supply Code with the Communications Guideline and effectively prevents there being two sets of regulations in force at the same time. This Draft Decision Paper, if it becomes final, will prevent the need for adoption of the proposed risk mitigation strategies.

NTESMO will assess the Final revised Code and if the regulation for information exchange is inconsistent with the Communications Guideline then NTESMO will convene a forum open to all NT market participants to determine the method moving forward for managing any inconsistencies which may exist.

4.1.3 NTESMO's conclusion

NTESMO has maintained the introduction of the Communications Guideline and MSATS procedures effective 2 October 2023.

4.2 Additional Business to Business Transactions introduced to the NTEM

4.2.1 Issue summary and submissions

The Communications Guideline and associated MSATS procedures introduce to the Northern Territory Electricity Market a wider range of service order transactions and variations on these transactions (service order sub-types) than existing service order procedures.

In response to the consultation process:

- Power and Water accepted the proposed new service order procedures
- Jacana Energy is concerned that the new service order procedures add complexity and additional work to the retail market participants

4.2.2 NTESMO's assessment

NTESMO acknowledges that the new service order procedures include additional options and data fields compared to the current NT service order procedures. While additional service orders and service order sub-types are available, they do not have to be used by market participants. For example, under the new service order procedures there are seven sub-types for a re-energisation request that a retailer can raise. There is no obligation on a retailer to use all seven sub-types. One option is 'recipient discretion' which can be used for all re-energisation requests.

The level of complexity that a market participant wants to use in these procedures is driven by their business model and processes and procedures.

NTESMO acknowledges that the initiation of supply and metering alteration and abolishment is with the retailer under the Communications Guideline. This is consistent with the rules in the NT Business to Business Service Order Process 2013 published by the Utilities Commission.

4.2.3 NTESMO's conclusion

NTESMO has maintained the proposed introduction of the Communications Guideline and MSATS procedures effective 2 October 2023.

4.3 Life Support Processes

4.3.1 Issue summary and submissions

The Communications Guideline and associated procedures propose a new mechanism and method for all market participants to share information on customers with life support equipment. This formed a section of the Draft Determination and changes were made to the relevant procedure.

In response:

- The Utilities Commission is concerned that the timing requirements in Guidance Note 4.6.(b) is inconsistent with the timing required under the Electricity Retail Supply Code
- The Utilities Commission stated that the timing requirements in Guidance Note 4.7.(b) places an additional obligation on market participants which does not exist in the Electricity Retail Supply Code

4.3.2 NTESMO's assessment

The Guidance notes contained in the procedure documents are for Guidance Purposes only and do not place binding obligations on participants. However, to remove any potential issues NTESMO has made the following two changes to the B2B Customer and Site Details Notification Procedure:

- Clause 4.6.(b) now states one business day to align with the Electricity Retail Supply Code
- Clause 4.7.(b) the frequency has been changed to be 'as agreed between market participants'

4.3.3 NTESMO's conclusion

NTESMO has amended the B2B Customer and Site Details Notification Procedure as detailed above.

5. Other Matters

No respondents have proposed any additional minor amendments to the various procedure documents within the Communications Guideline Package.

NTESMO has additionally made the following changes to the procedure documents:

- Minor amendments to correct formatting and typographical issues including
- Table 4L in the MSATS CATS Procedures has been revised due to formatting issues
- B2B Guide has been aligned with the revised Life Support changes detailed above in the B2B Customer and Site Details Notification Procedure

NTESMO states that the amended procedure documents will come into effect on 2 October 2023.

6. Final Report

NTESMO's Final Report is to adopt the following procedure documents in the form published with this Final Report, in accordance with Chapter 7A of the NT NER:

- NTESMO Communications Guideline v1.0 Final Report Change Marked
- NTESMO Communications Guideline v1.0 Final Report Clean
- NTESMO MSATS Procedure – Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations v1.0 Final Report Change Marked
- NTESMO MSATS Procedure – Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations v1.0 Final Report Clean
- NTESMO Standing Data for MSATS v1.0 Final Report Change Marked
- NTESMO Standing Data for MSATS v1.0 Final Report Clean
- NTESMO Meter Data File Format Specification NEM12 and NEM13 v1.0 Final Report Change Marked
- NTESMO Meter Data File Format Specification NEM12 and NEM13 v1.0 Final Report Clean
- NTESMO Business to Business (B2B) Guide v1.0 Final Report Change Marked
- NTESMO Business to Business (B2B) Guide v1.0 Final Report Clean
- NTESMO B2B Procedure Service Order Process v1.0 Final Report Change Marked
- NTESMO B2B Procedure Service Order Process v1.0 Final Report Clean
- NTESMO B2B Procedure Customer and Site Details Notification v1.0 Final Report Change Marked
- NTESMO B2B Procedure Customer and Site Details Notification v1.0 Final Report Clean
- NTESMO B2B Procedure Meter Data Process v1.0 Final Report Change Marked
- NTESMO B2B Procedure Meter Data Process v1.0 Final Report Clean
- NTESMO B2B Procedure One Way Notification Process v1.0 Final Report Change Marked
- NTESMO B2B Procedure One Way Notification Process v1.0 Final Report Clean
- NTESMO NT B2B Procedure Technical Delivery Specification v1.0 Final Report Change Marked
- NTESMO NT B2B Procedure Technical Delivery Specification v1.0 Final Report Clean

Appendix A: Summary of Submissions and NTESMO's Responses

Number	Question	Consulted Person	Participant Comments	NTESMO Response
1	Do the proposed measures for the potential conflict in arrangements under the Communications Guideline and the Electricity Retail Supply Code provide participants with an effective mechanism for managing this risk?	Utilities Commission	<p>The Commission is aware of stakeholder uncertainty and concern regarding potential inconsistencies between the Communications Guideline and ERS Code. As you know, the Commission is undertaking a review of the ERS Code, which includes consideration of Power and Water Corporation's (PWC) late submission proposing amendments to the ERS Code to accord with the NTESMO Communications Guideline and associated Market Settlement and Transfer Solutions (MSATS) Procedures.</p> <p>While the Commission's ERS Code draft decision is not yet finalised, the Commission can advise that it supports removing duplication or potential inconsistencies from the ERS Code on commencement of the Communications Guideline as appropriate. The Commission expects to publish its ERS Code draft decision and proposed amendments to the ERS</p>	NTESMO notes the response from the Utilities Commission and that the draft paper on the revised Electricity Retail Supply Code was issued dated 31 October 2022.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>Code prior to the end of the 2022 calendar year.</p> <p>The draft decision, once published, should provide stakeholders with more certainty as to how the Commission considers the two instruments, and associated processes and obligations, should relate, noting stakeholders will be able to make a submission on the ERS Code review draft decision if there are any concerns.</p>	
1	Do the proposed measures for the potential conflict in arrangements under the Communications Guideline and the Electricity Retail Supply Code provide participants with an effective mechanism for managing this risk?	Jacana Energy	<p>The proposed measures do not provide participants with an effective mechanism for managing the risk for conflict in arrangements under the Communications Guideline and the ERSC.</p> <p>Please refer to our response in questions 3 and 4.</p>	<p>This is a risk mitigation plan if the Electricity Retail Supply Code is not updated to align with the proposed Communications Guideline.</p> <p>The risk mitigation plan is to remove the conflict between the ERSC and the Communications Guideline so there is no requirement for participants to have an effective mechanism for managing the conflict risk as NTESMO's risk mitigation plan</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
				removes the conflict from existing. Please note the response from the Utilities Commission on this item and the fact the draft paper has been issued by the Utilities Commission dated 31 October 2022.
1	Do the proposed measures for the potential conflict in arrangements under the Communications Guideline and the Electricity Retail Supply Code provide participants with an effective mechanism for managing this risk?	Power and Water	Power and Water is satisfied with the proposed measures and will work with NTESMO if required should the required changes to the Electricity Retail Supply Code not be made by the commencement date	NTESMO notes the response from Power and Water.
2	Are there any other potential conflicts identified by participants between the Communications Guideline rules and the Electricity Retail Supply Code?	Jacana Energy	Jacana Energy is not in a position to confirm other potential conflicts and reiterate our request for the NTESMO to provide participants with visibility on the progress of all issues raised with the Utilities Commission.	The update from the Utilities Commission on the revisions to the Electricity Retail Supply Code is included with this Final Report.
2	Are there any other potential conflicts identified by participants between the	Power and Water	Power and Water has not identified any other potential conflicts.	NTESMO notes the response from Power and Water.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
	Communications Guideline rules and the Electricity Retail Supply Code?			
3	Do participants have any other proposals for managing the potential conflict in requirements between the two regulatory documents?	Jacana Energy	<p>Jacana Energy reiterates our requests for the NTESMO to:</p> <ul style="list-style-type: none"> • provide participants with visibility on the progress of all issues raised with the Utilities Commission. • form a joint steering committee with all relevant parties to address material risk in a collaborative and customer focused manner; and • to provide further details of the mechanisms being evaluated as part of their risk strategies in the event the ERSC is not amended within the required timeframes. 	<p>Please see item 2 for the progress update on the actions of the Utilities Commission.</p> <p>The Second stage consultation documents outlined what NTESMO will implement as a risk mitigation strategy if the ERSC is not updated by the Utilities Commission.</p> <p>In addition a joint steering committee is not appropriate. Each business has their own governance process and the process set out by NTESMO has provided ample opportunity for feedback. Project Delivery is separate to Communications Guidelines and should not be over lapped.</p>
3	Do participants have any other proposals for managing the potential	Power and Water	Power and Water has no alternative proposals.	NTESMO notes the response from Power and Water.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
	conflict in requirements between the two regulatory documents?			
4	Can participants provide details on where there are additional responsibilities being placed on the retailers through the Communications Guideline?	Jacana Energy	<p>Jacana Energy has so far identified 13 Service Order types (outlined below) where there are proposed additional responsibilities being placed on retailers through the Communications Guideline.</p> <p>Jacana Energy advises that it is not currently funded to take on these additional responsibilities and questions the value of these responsibilities being transferred to the retailer, given that metering is not contestable in the NT and that Power and Water Corporation is the appointed metering service provider under the NT NER.</p> <p>On this basis Jacana Energy does not believe it is practical or feasible to accept additional responsibilities and processes based on the foundation of a contestable metering market, underpinned by the power of choice that has no relevance in the NT market.</p>	<p>The Service Order procedures provide a list of available transactions for participants to use in the NTEM. They are optional. A participant does not have to use each and every service order type and sub type.</p> <p>The service orders are designed to cater for multiple different scenarios and contain many optional fields which can be left blank.</p> <p>The service order process is designed to follow the commercial transactions such that a party who is being billed for a service must first request that service. Hence these transactions must be initiated by the parties as listed in the Service Order procedure.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response																															
	<p data-bbox="293 260 1032 288">Additional responsibilities identified by Jacana Energy to date.</p> <table border="1" data-bbox="443 308 1496 1257"> <thead> <tr> <th data-bbox="443 308 611 437">B2B Procedure</th> <th data-bbox="611 308 934 437">Transaction Type</th> <th data-bbox="934 308 1292 437">Sub Type</th> <th data-bbox="1292 308 1496 437">Initiator/s</th> </tr> </thead> <tbody> <tr> <td data-bbox="443 437 611 1257" rowspan="13" style="writing-mode: vertical-rl; transform: rotate(180deg); text-align: center;">Service Orders</td> <td data-bbox="611 437 934 587" rowspan="2">Supply Service Works</td> <td data-bbox="934 437 1292 512">Supply Abolishment</td> <td data-bbox="1292 437 1496 512">Retailer</td> </tr> <tr> <td data-bbox="934 512 1292 587">Supply Alteration</td> <td data-bbox="1292 512 1496 587">Retailer</td> </tr> <tr> <td data-bbox="611 587 934 737" rowspan="2">Metering Service Works</td> <td data-bbox="934 587 1292 662">Move Meter</td> <td data-bbox="1292 587 1496 662">Retailer or MC</td> </tr> <tr> <td data-bbox="934 662 1292 737">Remove Meter</td> <td data-bbox="1292 662 1496 737">Retailer or MC</td> </tr> <tr> <td data-bbox="611 737 934 1110" rowspan="5">Re-energisation</td> <td data-bbox="934 737 1292 812">Remote</td> <td data-bbox="1292 737 1496 812">Retailer</td> </tr> <tr> <td data-bbox="934 812 1292 887">Retrospective Move-in</td> <td data-bbox="1292 812 1496 887">Retailer</td> </tr> <tr> <td data-bbox="934 887 1292 962">Physical Visit</td> <td data-bbox="1292 887 1496 962">Retailer</td> </tr> <tr> <td data-bbox="934 962 1292 1037">Move In</td> <td data-bbox="1292 962 1496 1037">Retailer</td> </tr> <tr> <td data-bbox="934 1037 1292 1110">Recipient Discretion</td> <td data-bbox="1292 1037 1496 1110">Retailer</td> </tr> <tr> <td data-bbox="611 1110 934 1257" rowspan="2">De-energisation</td> <td data-bbox="934 1110 1292 1185">Remote</td> <td data-bbox="1292 1110 1496 1185">Retailer</td> </tr> <tr> <td data-bbox="934 1185 1292 1257">Local Meter Disconnection</td> <td data-bbox="1292 1185 1496 1257">Retailer</td> </tr> </tbody> </table>	B2B Procedure	Transaction Type	Sub Type	Initiator/s	Service Orders	Supply Service Works	Supply Abolishment	Retailer	Supply Alteration	Retailer	Metering Service Works	Move Meter	Retailer or MC	Remove Meter	Retailer or MC	Re-energisation	Remote	Retailer	Retrospective Move-in	Retailer	Physical Visit	Retailer	Move In	Retailer	Recipient Discretion	Retailer	De-energisation	Remote	Retailer	Local Meter Disconnection	Retailer			<p data-bbox="1668 403 2078 754">The NT Business to Business Service Order Process 2013 published by the Utilities Commission has the retailer responsible for initiating the abolishment and alteration service orders. The Communications Guideline is consistent with the current regulations.</p> <p data-bbox="1668 778 2078 1098">For Re-energisation and De-energisation the service order sub types provide the option for the market participant to choose the type of work at a premise. A participant can use the sub type 'recipient discretion' and ignore all the other sub types if that suits their business process.</p>
B2B Procedure	Transaction Type	Sub Type	Initiator/s																																
Service Orders	Supply Service Works	Supply Abolishment	Retailer																																
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		<table border="1"> <tr> <td data-bbox="788 228 931 300"></td> <td data-bbox="931 228 1151 300">Recipient Discretion</td> <td data-bbox="1151 228 1500 300">Retailer</td> </tr> <tr> <td data-bbox="788 300 931 375">Special Read</td> <td data-bbox="931 300 1151 375">No Sub Type</td> <td data-bbox="1151 300 1500 375">Retailer</td> </tr> </table>		Recipient Discretion	Retailer	Special Read	No Sub Type	Retailer		<p>A special read service order is provided as an optional transaction if a participant wants to request a special read at a premise. It is optional and does not place an obligation on a participant if they choose not to exercise this option.</p>
	Recipient Discretion	Retailer								
Special Read	No Sub Type	Retailer								
4	<p>Can participants provide details on where there are additional responsibilities being placed on the retailers through the Communications Guideline?</p>	Power and Water	<p>Power and Water supports the direction of service order transactions contained within the Communications Guideline. Power and Water supports retailers being the sole point of contact and initiator of work at a customer premise for the following reasons:</p> <ul style="list-style-type: none"> • Customers have a ‘one stop service’ for all their energy needs including any work conducted at their premise • The retailer is initiating the service request which then provides a clear commercial trail for the invoicing of those services 	<p>NTESMO notes the response from Power and Water.</p>						

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<ul style="list-style-type: none"> Power and Water’s processes are streamlined as all customer requests initiate from the retailer reducing the administrative work for Power and Water 	
5	If there is a specific transaction or process which is leading to uncertainty for a participant can they provides the details that require clarification.	Jacana Energy	<p>1. Jacana Energy notes NTESMO’s assessment 4.1.2 under clause 4.1 Inconsistencies with the Electricity Retail Supply Code. Please confirm if the risk mitigation strategies NTESMO are evaluating;</p> <ul style="list-style-type: none"> are within the Communications Guideline v1.0 12th September 2022? or; are to occur outside of the second round Consultation process? <p>Our assessment of the risk mitigation plan is that it is circular and implies another round of draft procedures and a new customer transfer form are currently being evaluated.</p> <ul style="list-style-type: none"> Please outline the steps NTESMO would take to manage 	<p>The risk mitigation strategies were included in the consultation documents issued with the Second Stage consultation and are not in the Communications Guideline.</p> <p>NTESMO will work with PWC to submit a new customer transfer request form and service order process to the Utilities Commission for approval under the current rules in the Electricity Retail Supply Code.</p> <p>There is no impact on the current Communications Guideline</p> <p>The current customer transfer request form will not be</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>this under the current project Governance framework.</p> <ul style="list-style-type: none"> • How does this differ from the current Communications guideline v1.0 12th September? • Will the use of the current Customer Transfer Request form still be required? What are the roadblocks to automate this via (MSATS) • What does the new Customer Transfer form look like? (e.g. what data field changes will be required. • What will the end-to-end process look like? • What are the time constraints to the timelines if either of these mechanisms were to be implemented? <p>2. The B2B procedures are high level and we continue to navigate our way through the proposed changes. There are a number of B2B procedures outlining various options, with some of these options carrying significant compliance risk</p>	<p>required. All retail transfers will be via MSATS</p> <p>All transactions will be via MSATS as per the Communications Guideline procedures.</p> <p>This is a statement.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>and new responsibilities for Retailers.</p> <p>In the spirit of transparency, Jacana Energy requests NTESMO provide a more comprehensive picture of the proposed changes as to how to operationalise the future state. Jacana Energy requests a workshop to better understand from the Local Network Service Provider which option(s) the network provider intends to impose and where this would be defined in the Final Release of the Communications Guideline.</p> <p>3. Further to this, and despite our best efforts, Jacana Energy has no visibility of the following;</p> <ul style="list-style-type: none"> • a fixed tangible Go-Live date that is achievable for all market participants with go-live acceptance criteria defined and agreed with all market participants 	<p>NTESMO refers Jacana to the Communications Guideline and associated procedures for this detail. Included in the procedures are guides and comments for clarification.</p> <p>The LNSP will accept any B2B service orders sent via MSATS in accordance with these procedures.</p> <p>The Communications Guideline and MSATS procedures all have an effective date of 2 October 2023. This can be taken as the go live date.</p> <p>Industry testing is an optional activity and each participant can choose to participate or not at their discretion. The volume of</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<ul style="list-style-type: none"> • a detailed industry testing schedule and or • a detailed transition plan for Life Support and other key functions to work towards. <p>In the spirit of transparency, we request this information as soon as possible to close out critical milestones which include removing some of the uncertainties over the timings provided within the Market Readiness Plan. This information is a key dependency for Jacana Energy to provide our 3rd party vendor to scope appropriately in order for our capital expenditure approval process to move forward.</p> <p>Jacana Energy reiterates its concerns expressed in the first round of consultation in relation to the short timeframes proposed for testing. As discussed, the changes required to Jacana Energy’s retail operating system are significant with material impacts on customers if the transition to MSATs is not managed in a considered and careful way.</p>	<p>testing is up to each participant to decide depending on their systems processes and internal compliance procedures. NTESMO is facilitating a window for this to occur but the volume of testing is dictated by the participants.</p> <p>Initial workshops have commenced on the life support transition processes. Further workshops will be held over the next 12 months.</p> <p>Jacana’s concerns are noted. NTESMO reiterates the volume of testing is the responsibility of each participant.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			As highlighted in the first round of consultation, Jacana Energy does not believe it can deliver the required changes for a successful go-live by July 2023, given the time taken to release and consult on the Communications Guidelines and given the need for the required information outlined above. Jacana Energy believes it will need at least 6 months to test and provide assurance to its Board and Shareholder that the integration has been successful, prior to go live.	The effective date for the procedures is 2 October 2023 and the planned start date for industry testing is March 2023 providing a six month window for Jacana to test their systems and processes.
5	If there is a specific transaction or process which is leading to uncertainty for a participant can they provides the details that require clarification.	Power and Water	There are no specific transactions causing concern for Power and Water.	NTESMO notes the response from Power and Water.
6	Are there any other inconsistencies not already identified between the life support obligations under the Electricity Retail Supply Code and the proposed B2B Customer Details and Site Notification procedure?	Jacana Energy	Jacana Energy is not in a position to confirm other inconsistencies at this time and reiterate our request for NTESMO to provide participants with visibility on the progress of all issues raised with the UC.	Refer to the update provided in Question 2 above.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			Jacana Energy acknowledges collaboration has commenced with the Local Network Service Provider and NTESMO for the transition of Life Support.	
6	Are there any other inconsistencies not already identified between the life support obligations under the Electricity Retail Supply Code and the proposed B2B Customer Details and Site Notification procedure?	Power and Water	Power and Water has not identified any other inconsistencies with the proposed life support provisions in the Communications Guideline and those contained in the Electricity Retail Supply Code.	NTESMO notes the response from Power and Water.
Other	Other Submissions	Utilities Commission	Life support equipment processes. The Commission is concerned about potential inconsistencies and confusion between the Communications Guideline and ERS Code in relation to life support equipment obligations and processes. The risks to customers requiring life support equipment at their premises need to be managed carefully. The Commission acknowledges NTESMO's active engagement with the Commission to date on its intended adoption of the Communications Guideline, and that	NTESMO notes the issues raised by the Utilities Commission.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>NTESMO has made changes to the proposed Communications Guideline to align with the ERS Code, particularly in relation to life support equipment processes. However, as this is the last opportunity to formally provide feedback for consideration before NTESMO makes its final determination, the Commission advises that it has identified two MSATS Procedures guidance notes that may cause confusion for market participants in relation to life support equipment obligations and processes in the Communications Guideline vs the ERS Code, which should be addressed by NTESMO.</p> <p>Firstly, clause 4.6(b) of the B2B Procedure Customer and Site Details Notification is a guidance note that states the “Recipient of a valid LifeSupportRequest must provide a LifeSupportNotification and use best endeavours to respond within 1 business day and no later than 5 business days” (previously this was ‘within 2 business days and no later</p>	<p>NTESMO will change this Guidance Notes to 1 Business Day to align with the Electricity Retail Supply Code.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>than 5 business days'). While the ERS Code does not include a similar provision for the recipient of a valid LifeSupportRequest, the ERS Code does include timeframe obligations in relation to life support equipment notifications between the retailer and the network provider, which is 1 business day. The Commission considers the guidance note has the potential to be misinterpreted and may lead to uncertainty about life support equipment obligations and should be rewritten or deleted by NTESMO, noting clarity is vital to protect life support equipment customers.</p> <p>Secondly, clause 4.7(b) of the B2B Procedure Customer and Site Details Notification is a guidance note that states current retailers and distribution network service providers must conduct a reconciliation of Life Support Details at least quarterly. While the Commission supports regular reconciliation of life support equipment registers, it notes that an equivalent obligation does not exist in the ERS</p>	<p>NTESMO notes this is a Guidance Note and not an obligation and will change this clause to be at a frequency agreed between the market participants.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>Code. From the Commission’s perspective, this appears to be a new obligation for market participants, however as it is in a guidance note, it is unclear. NTESMO should clarify or delete the guidance note so as not to confuse market participants as to their life support equipment obligations, noting clarity is vital to protect life support equipment customers.</p> <p>In relation to protecting life support equipment customers, the Commission notes the Draft Determination indicates NTESMO will consider stakeholder suggestions for how to implement the new Communications Guideline life support process and data reconciliation through NTESMO’s market readiness process. Given there will be an increased risk to life support customers during the change process, the Commission strongly recommends NTESMO work closely with market participants and put in place an agreed risk mitigation strategy, including a plan on how ERS Code compliance (and thus life support equipment customer</p>	<p>NTESMO notes the comment from the Utilities Commission. Management of the life support customers through the change to the Communications Guideline will form part of the transition and go live process.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>protections) can be maintained should issues be identified during and directly following the transition.</p> <p>As a final point in relation to life support equipment customer protections, to assist NTESMO in making its final determination and provide certainty to market participants, the Commission advises that it does not intend to make any amendments to the life support equipment provisions in the ERS Code to account for NTESMO's Communications Guideline and MSATS Procedures.</p>	<p>NTESMO notes the comment from the Utilities Commission.</p>
Other	Other Submissions	EDL Energy	<p>EDL thanks you for the opportunity to respond to the second stage of the Communications Guideline and MSATS Procedure consultation.</p> <p>We note that second stage of the process is primarily related to detailed operational questions for an active retailer, which is most relevant to Jacana.</p>	<p>NTESMO notes the response from EDL Energy.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			As such, EDL has no further comments to add to those raised during the first stage of consultation.	

Contact

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