

# NTESMO Communications Guideline

## PROCEDURE CONSULTATION

## SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Jacana Energy

***Submission Date:*** 24<sup>th</sup> October 2022

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## 1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft report and determination associated with the Communications Guideline consultation.

The consultation is being conducted for the initial adoption of the NT Communications Guideline and use of the AEMO MSATS system for information exchange processes.

## 2. Inconsistencies with the Electricity Retail Supply Code

Question	Description	Participant Comments
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?	<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>
2	Are there any other potential conflicts identified by participants between the Communications Guideline rules and the Electricity Retail Supply Code?	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.
3	Do participants have any other proposals for managing the potential conflict in requirements between the two regulatory documents?	<p>Jacana Energy reiterates our requests for the NTESMO to:</p> <ul style="list-style-type: none"> <li>provide participants with visibility on the progress of all issues raised with the Utilities Commission.</li> <li>form a joint steering committee with all relevant parties to address material risk in a collaborative and customer focused manner; and</li> </ul>

Question	Description	Participant Comments
		<ul style="list-style-type: none"> <li>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.</li> </ul>

### 3. Retailers taking on Additional Responsibilities

Question	Description	Participant Comments
4	Can participants provide details on where there are additional responsibilities being placed on the retailers through the Communications Guideline?	<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>

Question	Description	Participant Comments				
	Additional responsibilities identified by Jacana Energy to date.					
		<b>B2B Procedure</b>	<b>Transaction Type</b>	<b>Sub Type</b>	<b>Initiator/s</b>	
		<b>Service Orders</b>	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	
				Recipient Discretion	Retailer	
			Special Read	No Sub Type	Retailer	

Question	Description	Participant Comments
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.	<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"> <li>are within the Communications Guideline v1.0 12th September 2022?</li> <li>or;</li> <li>are to occur outside of the second round Consultation process?</li> </ul> <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"> <li>Please outline the steps NTESMO would take to manage this under the current project Governance framework.</li> <li>How does this differ from the current Communications guideline v1.0 12th September?</li> <li>Will the use of the current Customer Transfer Request form still be required? What are the roadblocks to automate this via (MSATS)</li> <li>What does the new Customer Transfer form look like? (e.g. what data field changes will be required.</li> <li>What will the end-to-end process look like?</li> <li>What are the time constraints to the timelines if either of these mechanisms were to be implemented?</li> </ul> <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 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</p>

Question	Description	Participant Comments
		<p>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"> <li>• 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</li> <li>• a detailed industry testing schedule and or</li> <li>• a detailed transition plan for Life Support and other key functions to work towards.</li> </ul> <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 3<sup>rd</sup> 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>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.</p>

## 4. Life Support Processes

Question	Description	Participant Comments
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?	<p>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.</p> <p>Jacana Energy acknowledges collaboration has commenced with the Local Network Service Provider and NTESMO for the transition of Life Support.</p>