

Reference No	Participant Name	Old Clause No	New Clause No	Comments	IEC Response
--------------	------------------	---------------	---------------	----------	--------------

<p>1</p>	<p>SA Power Networks</p>		<p>Overall Procedure Changes</p>	<p>SA Power Networks are supportive in principle of the change in direction made by the IEC between the first stage consultation and the current draft determination. However, we are very concerned that this major change in direction from the easy to implement email solution to the current formal B2B “XML” based system transaction puts SA Power Networks in a very real position of not being able to deliver the required internal system changes and therefore being non compliant when these new B2B Procedures become effective on 1 February 2019.</p> <p>This major change in direction requires a significant IT investment to support the management of the required transactions – use of the AEMO B2B LVI is not possible for our business (our current market transaction systems automatically attempt to extract all transactions within the gateway well ahead of an individual user being able to access them directly via the LVI).</p> <p>SA Power Networks understands that the solution options had been rigourously debated by the Industry and the IEC ahead of the publishing of the first stage consultation and a clear decision was made to proceed with a short term email solution to avoid putting the industry under delivery timeframe pressures, avoid unwarranted financial investment and enable the development of the best long term solution (noting that the majority of Industry indicated that a Central Repository was the preferred long term solution).</p> <p>Based on this previously agreed short term direction, no allowance had been made to internal budgets or system development roadmaps to cater for this change. It appears</p>	<p>The IEC /B2BWG note SA Power Networks comments and acknowledge the risks involved with the change of direction between intitial and draft. Unfortunatley the date of implementation can’t be changed due to the date the rule comes into effect.</p> <p>The IEC/B2BWG suggest that if any participants are not able to meet the timeframe then they may need to adopt a contingency position.</p> <p>Upon making the decision prior to draft consultation,</p>
-----------------	--------------------------	--	----------------------------------	---	---

				<p>that the IEC has not considered the full set of flow on impacts of this change in direction to the wider industry. SA Power Networks expects that most businesses require early indication on the direction of major industry changes and when changes to B2B Procedures result in the development of new “XML” transactions and schema that a minimum of 12 months is provided from the point of final determination to enable the required internal developments to occur.</p> <p>SA Power Networks have commenced internal work to determine how we may be able to stage any internal developments to provide a capability that enables us to achieve compliance, but we are not in a position to confirm this at the time of making our submission. Even in the unlikely event that we are able to rush changes to IT systems through, there wont be time for adequate testing or to fix any defects identified. This is not a function we want to risk non compliance so we are calling out early that we have significant concerns of meeting a 1 Feb 2019 implementation date. As its stands, all of the back end processing work is going to need to be handled manually as there isn’t the time to develop automation.</p>	<p>the IEC discussed a central database option as a long term solution, but a commitment couldn’t be made by AEMO as to when this could be implemented as a number of factors need to be determined and discussed within AEMO. AEMO advised that the central database would not be available for December 2019 which was part of the IEC delivery schedule in the initial review of life support.</p> <p>AEMO are still assessing the viability and any legal requirements</p>
--	--	--	--	--	--

					around AEMO facilitating a Central Data Repository.
2	CitiPower Powercor		General comments	<p>CitiPower Powercor is supportive of the changes in the Draft Determination version of the procedure. We are however apprehensive that this major change in direction requires significant systems upgrades to support a B2B transactions solution and with a late determination, the short implementation timeframe will mean it is unlikely we can be compliant by 1 February 2019.</p> <p>Our business also typically requires a minimum of 12 months from Final Determination to implement these types of system changes. In the Final Determination of the Rule the AEMC highlighted that an implementation timeframe of 12 months would be sufficient for participants to make relevant system and process changes. We recommend the IEC consider submitting a rule change request to the AEMC to push out the go live date to 1st July 2019.</p>	<p>Refer to 1.</p> <p>The IEC/B2BWG believe that they will be unable to have a rule change raised and considered by the AEMC within the timeframes under the NEL 94 (1) (c).</p>

<p>3</p>	<p>Powershop</p>		<p>19 June 2018</p> <p>Australian Energy Market Operator By email: NEM.Retailprocedureconsultations@aemo.com.au.</p> <p>To Whom It May Concern</p> <p style="text-align: center;">B2B Procedure Changes: Notice of Second Stage Consultation</p> <p>We refer to the Notice of Second Stage of Consultation and Draft Consultation Change Pack dated 25 May 2018 (Change Pack) in respect of the proposed B2B Procedure Changes and thank AEMO and the IEC for the opportunity to provide further feedback on the proposed changes.</p> <p>As you are aware, Powershop Australia Pty Ltd (Powershop) operates an innovative electricity retailing business in the National Electricity Market, with over 100,000 customers in Victoria, New South Wales and South East Queensland.</p> <p>Powershop was supportive of a change to the B2B Procedures to allow participants to use email as an interim solution for exchanging additional life support information to meet the new obligations in the Rules subject to some conditions. Such conditions included a requirement that the</p>	<p>The IEC/B2BWG acknowledge Powershop’s comments and will look to further improve the communication to participants and are happy to take any feedback on how this can be achieved.</p> <p>The communication was sent to IEC members, B2BWG members and also registered corresponding members as well as participants who responded to the initial consultation.</p>
----------	------------------	--	--	---

				<p>changes are the minimum necessary to permit such an outcome while development of a more complete solution using the existing B2B e-hub infrastructure is undertaken.</p> <p>The proposed alternative solution set out in the Change Pack of moving directly to a B2B e-Hub model is preferable provided that sufficient time is available to develop and implement the solution and appropriate arrangements are in place to enable staged adoption with minimal impact to smaller retailers. Our review of the Change Pack confirms that AEMO and the B2BWG believe that the proposed changes will have minimal impact on existing MSATS and retailer systems and that the time frames are achievable.</p> <p>While we have no particular concerns with the proposed solution we believe it is imperative that AEMO and the B2BWG ensure that the opinions of all relevant participants are sought. This is particularly relevant as the nature of the consultation has changed dramatically from an initial temporary email solution to a full B2B implementation requiring XML schema update and the use of the B2B e-Hub.</p> <p>As many participants may not have been aware of this significant change, they may not be engaged in this consultation. As the proposed alternative solution has the potential to impact smaller retailers utilising the POC Transition Tool, it may in fact have a wider impact on some participants than as set in Section 6 of the B2B Procedures Draft Consultation Change Pack (B2B Procedures Draft</p>	
--	--	--	--	--	--

				<p>Report Life Support v1-0). A consultation with those who were not part of the original straw poll (which was taken only amongst those who responded to the initial consultation (email solution) and which automatically excluded those who did not respond because they supported an email solution, may bring to light other factors which need to be considered. In light of this, the IEC should consider extending or reopening the consultation if any such significant matters arise.</p> <p>If you have any further queries please feel free to contact me.</p> <p>Yours sincerely</p> <p>Ed McManus CEO Powershop Australia Pty Ltd</p>	
--	--	--	--	---	--

<p>4</p>	<p>Tango Energy</p>		<p>General - Consultation/ Process</p>	<p>Tango Energy recognises the need for changes to Life Support processes in light of the NERR change and supports appropriate changes to procedures as a result.</p> <p>Tango Energy notes the following key points regarding the nature of development of a solution to meet the NERR requirements.</p> <p>It would appear the B2BWG and IEC have been uncertain in the development and determination of a solution. Tango notes the following:</p> <ul style="list-style-type: none"> • Industry collectively put forward a preference for a holistic solution for Life Support which should include consideration of a ‘central repository’ for Life Support information. • The IEC determined an interim solution should be developed and requested AEMO and the B2BWG give due consideration to a longer term solution, including the viability of a central repository. • The IEC gave consideration to a full B2B solution and an e-mail based solution, determining the e-mail based solution was most appropriate as an interim measure. (It can be assumed a Prime Facie case was established based on this decision, as is required to commence a rules consultation on the B2B Procedures). • The IEC, based on a straw poll (voting limited to the B2B Working Group membership and those participants who had responded to the First Stage Consultation), decided to forgo the email solution 	<p>Refer to 3</p> <p>The IEC/B2BWG assessed that an email solution could be as costly as a transaction and that an email solution did not provide the security or the auditability required.</p> <p>The IEC/B2BWG believed the LVI would provide participants with the option of using this for small volumes instead of building an automated solution.</p> <p>Prior to initial consultation the IEC asked the B2BWG to provide to them the impacts of the rules. The B2BWG provided the IEC</p>
----------	---------------------	--	--	--	---

				<p>and move to one of the original options presented prior to consultation which, it is assumed, did not meet the requirements for initial consultation.</p> <p>Tango questions the appropriateness of ‘voting’ on a solution rather than undertaking a review of benefits and impacts to all sectors of the market, ensuring the NEO and B2B Principles & Factors had been assessed against both options under consultation. Based on Section 7 of the Change Pack, Tango notes the IEC considers a Cost Benefit Statement ‘is not required as there is no optionality in regard to the requirement to meet the new obligations’. However, it is indeed important to consider the cost and benefit statement when assessing any number of options that could achieve the same regulatory requirement.</p> <p>Tango questions, for an interim solution, the incremental value of moving to a solution requiring all participants to:</p> <ul style="list-style-type: none"> ○ Undertake a full schema change; ○ Create a suite of new transactions; ○ Manage inbound CSDN transactions for the first time; <p>The B2B Change Pack seems to indicate this is a more efficient minimal change for Retailers given the availability of the LVI for the smaller retailer. Tango has provided further feedback to the use of the LVI later in this response and reiterates that full implementation and the use of the LVI involve significant system changes. The proposed solution is not minimal impact.</p> <p>Tango understands the key difference between the two</p>	<p>with solutions, and assessment of these solutions against the B2B Principles and Factors.</p> <p>Upon making the decision prior to draft consultation, the IEC discussed a central database option as a long term solution but a commitment couldn’t be made by AEMO as to when this could be implemented as a number of factors need to be determined and discussed within AEMO. AEMO advised that the central database would not be available for December 2019</p>
--	--	--	--	---	--

				<p>solution options presented in this consultation was 'security' of customer data via e-mail, which we believe could be addressed simply in the e-mail solution.</p> <p>Tango considers the full B2B solution proposed to be overly onerous for an interim solution and that in the event of a holistic solution being agreed, most, if not all, of the changes to meet the B2B solution could become redundant.</p>	<p>which was part of the IEC delivery schedule in the initial review of life support.</p> <p>AEMO are still assessing the viability and any legal requirements around AEMO facilitating a Central Data Repository.</p>
--	--	--	--	---	--

5	Tango Energy		Small Retailer Engagement	<p>Participation in the B2BWG is limited to nominated members (although participants who are not members of the B2BWG can attend meetings, however they can have no input to the discussions or influence working group outcomes) and as such the consultation response is the only avenue available for ‘small’ retailer feedback. Although Tango Energy has engaged via the consultation process it is recognised a significant number of ‘small’ retailers are not engaged in the consultation process. Some of these small retailers may not be engaged because they supported an interim e-mail solution. This has the potential to create an unbalanced outcome where the views of a significant number of participants are not taken into consideration.</p> <p>The voting framework for this consultation, as noted previously, was particularly prohibitive. Those canvassed were only the B2BWG and Consultation respondents. Other participants who potentially agreed with the e-mail solution (thus did not provide a consultation response) did not get to ‘vote’. Additionally those non-respondents may not closely monitor the consultation, on the understanding that any modifications to an e-mail solution would be manageable.</p> <p>Tango requests the IEC review its engagement model for smaller market participants and the Terms of Reference of the B2BWG, for this consultation and future consultations, to ensure solution options are considerate of all sectors of the market.</p> <p>It would be beneficial for industry to be capable of developing market solutions that are scalable to allow small players and market entrants to meet regulatory</p>	<p>The communication was sent to IEC members, B2BWG members and also registered corresponding members as well as participants who responded to the initial consultation. In February 2018 retailer members of the B2BWG emailed the IEC rep for small retailers offering their services and a meeting for any of their constituents they represent at the IEC.</p> <p>This was acknowledged by that IEC rep.</p>
---	--------------	--	---------------------------	--	--

				requirements, thus promoting and catering to a fully competitive market. Should market solutions be unnecessarily complex, this can be prohibitive for smaller market participants.	
--	--	--	--	---	--

	Tango Energy		LVI	<p>Tango Energy notes the feedback in the Change Pack that the smaller participants will be able to manage these transactions via the Low Volume Interface (LVI).</p> <p>Tango Energy disagrees that this is a minimal impact solution for Small retailers as the LVI will not be able to separate life support transactions from any other inbound transactions to our systems. Wholesale system changes are still required.</p> <p>AEMO systems provide a (-1) schema transformation which allows participants to take up schema change in a more flexible manner; however where there is an entirely new transaction, schema transformation becomes redundant. In this case the new schema transactions will be received via the participants inbox/outbox and thus we <u>must</u> upgrade our systems to manage these transactions. The LVI only provides limited functionality for manual generation/viewing of the transactions. Tango does not believe the solution design and consultation process took into consideration the direct impact on the PoC Transition Tool.</p> <p>With a view to providing significant benefit to small participants, Tango Energy request the IEC and AEMO review the LVI in line with feedback provided on the previous item on small participant engagement. Additionally, the review should include features of the LVI in line with this consultation feedback and those items documented as part of the PoC LVI workshop.</p>	<p>The IEC/B2BWG notes the comments from Tango but have not received the same feedback from other small retailers.</p> <p>The IEC/B2BWG were tasked in providing a solution for the benefit of the industry as a whole. The IEC/B2BWG make their decision based on what, on balance, is best for the industry and not individual participant circumstances.</p> <p>In this instance both options were going to impact participant systems and there was not a</p>
--	--------------	--	-----	---	---

					<p>solution which suited all participants.</p> <p>The IEC have asked AEMO to investigate the possibility of having transactions raised via the LVI be treated differently than those transactions that come via an automated gateway.</p>
--	--	--	--	--	---

	Tango Energy		General – Jurisdictional applicability	<p>Tango Energy understands the NERR does not apply in Victoria and as such applying this change Nationally under the B2B Procedures creates new obligations in the market, which is outside the remit of the IEC and the B2B Procedures.</p> <p>It is commonly understood that Jurisdictional documents take precedence over a Procedure <i>where a conflict</i> is found. However in this case there is no conflict, just additional obligations created by the B2B Procedures.</p> <p>Tango recommends making the transaction either ‘optional’ therefore it shall be used where the NERR provides the overarching obligation OR adding a clause/table that defines that the transaction is Not Required in Victoria.</p>	<p>The IEC/B2BWG believe that the procedures are a national procedure that provide efficiency and consistency. The Victorian DB rep on the B2BWG advised that the Vic DB’s will be implementing these transactions as its an improvement on the current process of providing life support information. The Vic DB rep believes the ESC is supportive of this improvement.</p> <p>A new clause has been added to section 1.1.</p> <p>(d) The Life Support Request and the Life Support Notification have</p>
--	--------------	--	--	--	---

					<p>been created to enable industry participants to meet their obligations under the NERR. Participants are responsible to ensure that they are meeting their obligations. The AER will be the determining body as to whether participants are meeting their obligations.</p> <p>The IEC/B2BWG believe this should alleviate Tango's concerns.</p>
--	--	--	--	--	---

	Energy Australia			<p>EnergyAustralia’s general comments relate to:</p> <ul style="list-style-type: none"> • Consultation process and implementation timeframes • Metering <p>Consultation process and timing</p> <p>Thank you for the opportunity to provide feedback. While EnergyAustralia is not a voting member of the B2BWG or the IEC, we are pleased to have actively participated in the working group and drafting of the procedures as an observer and hope the B2BWG and AEMO continues with its consultative approach.</p> <p>We note there has been a significant change in the IEC decision between the first and second consultation stage, leaving significantly less time for participants to implement the option chosen by industry. Industry participants now have approximately 6 months to implement and test a significant IT and schema change from 23 July (when the B2B Procedures are finalised) by 1 February 2019, with testing likely to take place over the 2018-19 Christmas and New Year holiday period. In addition, the AER is also expected to provide further guidance in October/November on its compliance expectations during these situations, which might have an impact on the system changes that are needed.</p> <p>This is a very tight timeframe and any further significant changes will result in even greater challenges to</p>	<p>The IEC/B2BWG note EA comments. Refer 1. Refer to the AER guideline on life support.</p>
--	------------------	--	--	--	---

				<p>successfully implementing these complex industry changes. We consider that each option considered by the IEC had its merits and disadvantages, and that it is not practicable to restart the consultation process for Option 2, the B2B transaction option, due to the requirement to comply with the AEMC rule changes by 1 February 2019.</p> <p>Our view is that the IEC and AEMO should proceed with the solution as it is, with no further major changes to the existing B2B transaction option chosen, to allow industry sufficient time to implement a workable solution. It would be useful if the IEC, AEMO, using appropriate powers, are able to guide industry in agreeing clear and realistic industry timeframes for implementation and testing and making these transparent to participants and other relevant stakeholders (such as the AER and AEMC) as soon as possible.</p> <p>Metering</p> <p>During Power of Choice (POC) changes made on 1 December 2017, an industry solution was agreed for third-party Metering Providers (MP) to be able to request and be provided information when a retailer planned interruption occurs and a vulnerable or life support customer has to be taken off supply to perform metering works through use of the Customer Details Request (CDR), and being returned with a CDN. The B2B</p>	
--	--	--	--	--	--

				<p>communication between the retailer and MC/MP is increasing in importance as the MP encounters increasingly complex scenarios such as locked meter boxes, and multi occupancy situations. Further industry discussions also foreshadow the ability to be able to re-energise or de-energise a customer remotely outside of Victoria.</p> <p>The current solution proposed by the IEC for industry, retains the life support status and information in the CDN needed by the third party Metering Provider, without needing to make changes to the CDN schema or process. In addition, this solution also retains customers' rights to privacy of their life support details, which may not be appropriate to provide to a commercially engaged third party Metering Provider. This also ensures that industry continues to have an agreed process for protecting vulnerable life support customers while ensuring that they get the full benefits of the POC metering reforms and access to a smooth meter exchange process.</p> <p>While retailers and their metering parties have bilateral contractual arrangements and may flexibly make appropriate arrangements within this proposed solution, we don't see this is a robust solution suitable for the long-term. The issue is that the LSN will be used by retailers to communicate life support details to DNSPs, and retailers will use the CDN and/or other bespoke transactions to communication life support</p>	
--	--	--	--	--	--

				<p>details to metering parties. This means that all retailers will be using multiple types of transactions to communicate the same information to different parties. This is not an efficient or robust solution and we feel it should be replaced in the medium to longer-term when parties have more time to make more extensive system changes. Throughout this consultation the need to meet the 1 February 2019 deadline, flexibility, and low cost solutions has overridden the need for retailers and metering parties to have good procedures in place to support compliance with life support regulations.</p> <p>There are a few options which include manual processes, LSN/LSR, or CDN; having a robust and efficient option for retailer and MC/MP to contract ultimately protects and benefits the customer.</p> <p>We therefore recommend that:</p> <ul style="list-style-type: none">• No further changes are made to the Customer Details Notification (CDN), and support the IEC option 2 being implemented;• CDNs should continue to be updated with accurate life support information and acknowledged as important industry information; and that• A better long-term solution is assessed for later implementation. <p>Please contact Shawn Tan at 03 8628 1512 or shawn.tan@energyaustralia.com.au should you wish to discuss in further detail.</p>	
--	--	--	--	---	--

