Stakeholder submissions on Draft Market Readiness Strategy v0.1

#	Stakeholder comment	AEMO response
1	This [Strategy] document should be owned and the finer details developed by the POC Program Consultative Forum (POC-PCF) and the POC Readiness Working group (POC-RWG). Establishing these groups is a priority.	The finer details of the Strategy will be developed by AEMO in collaboration with participants. This will be achieved through developing the associated plans referenced in the Strategy (e.g. Industry Readiness Reporting Plan, Industry Testing Plan, Accreditation and Registration Plan, Transition and Cutover Plan). The POC Program Consultative Forum (POC-PCF) and POC Readiness Working Group (POC-RWG) are currently being established for meetings from August 2016. Terms of reference for the POC-PCF and POC-RWG was distributed to POC stakeholders on 5 July 2016 and 15 July 2016, respectively. POC-RWG meetings are expected to be held every one to two months, potentially increasing in frequency in 2017 in line with an uptick in readiness activity in the lead up to the POC "go-live" date. AEMO is the "owner" of the Strategy. This is because the Market Readiness work stream is one of three key work streams comprising AEMO's POC Implementation Program (n.b. the other two being Procedural and Technical work streams). That said, and in accordance with readiness principle #2 (i.e. collaborative approach to market readiness), industry will play an important role in assisting AEMO to develop the Strategy and associated plans in a collaborative manner. The logical body to assist AEMO in this respect is the POC-RWG. A near-final version of the Strategy, incorporating stakeholder feedback, will be provided to the POC-RWG for comment (at its meeting on 5 August 2016), after which AEMO will seek to finalise the Strategy in September 2016. Ideally, the POC-RWG should discuss and resolve readiness matters; any unresolved matters may be escalated to the POC-PCF. <u>Conclusion:</u> POC-PCF and POC-RWG being established during July 2016. POC-RWG to review draft Strategy on 5 August 2016.
2	Section 1.3.1, Objective of Market Readiness Strategy — The focus on "uninterrupted systems operations" is likely to be too narrow. Ensuring continued service delivery will be broader than just ensuring that IT systems can inter-operate. It will also include: • Confirmation of registration and accreditation for key participants. • Successful trial data conversions and role conversion etc in preparation for go live. • Ensuring that operationally critical commercial contracts are in place.	Ensuring continued service delivery to NEM end-use customers requires review, amendment and action on a number of fronts by AEMO and market participants. At the same time, it is important to recognise that some activities will be collectively coordinated by AEMO in collaboration with participants under the Strategy, while other activities will be individually managed by AEMO and participants under their organisational readiness programs (e.g. as noted in the Strategy, any consequential changes to AEMO and participants' internal business systems/processes are to be captured in each party's readiness program). To reflect the above considerations, the "objective" has been amended as follows: • "The objective of the Market Readiness Strategy is to facilitate uninterrupted ~~systems~~<u>market</u> operations for AEMO and NEM participants and, as a consequence, continued service delivery to NEM end-use customers, prior to and effective from the 'go-live' date<u> for the POC reforms</u>." Similarly, the "purpose" of the Strategy has been amended as follows:

	• Ensuring that no safety related showstoppers are present prior to go live (despite safety being out of scope). • Ensuring that the treatment of in-flight transactions and long lived transactions that span the go-live date is being addressed in a consistent way across the program, and are managed correctly at go-live. • Also includes ensuring a clear escalation path for post go-live issue resolution (e.g. non adherence to procedures, service level failure) and an executable business continuity plan.	• "The purpose of the Market Readiness Strategy is to set out a plan for managing, coordinating, <u>informing,</u> monitoring and reporting on AEMO and NEM participants' <u>operational preparedness, particularly in relation to revised</u> business systems <u>and</u> ~~preparedness, including help inform the development of supporting~~processes, for a seamless transition to new procedural arrangements starting on the "go-live" date <u>for the POC reforms</u>." As noted in the Strategy, key market operational activities and associated milestones are to be managed via associated plans (e.g. Industry Testing Plan) and monthly readiness progress reporting (n.b. draft readiness criteria and a sample reporting template were previously included as Appendices B and C of v0.1 of the Strategy, but have been since been removed from the Strategy and included in their own plan – the Industry Readiness Reporting Plan – for review and finalisation as part of that plan). Market participants' progress in managing readiness activities outside the scope of the Strategy (e.g. safety, ensuring commercial contracts are in place) is to be captured in their monthly reporting to AEMO, using the template set out in the Industry Readiness Reporting Plan. Each participant should be managing these matters within their organisational readiness program in order to be in a position to comply with their respective jurisdictional or contractual obligations. Any readiness risks should be raised by the concerned party for logging in the risk register for management and resolution (e.g. for escalation to the POC-PCF). <u>Conclusion:</u> Sections 1.3.1 (objective) and 1.3.2 (purpose) of the Strategy have been updated, as per the above edits.
3	Section 1.3.3, Scope of the Market Readiness Strategy — Whilst ensuring conformance with safety regulatory obligations might be out of scope at a program level – the requirements to ensure safe operations, is something that most participants are obliged to do. As such "safety" must still be acknowledged as a vital go-live criteria – and not simply ignored at the program level. Also as per the comments for section 1.3.1, there will be non-systems related Market Readiness items that should be acknowledged in this section.	As per #2, a participant's progress in managing readiness activities outside the scope of the Strategy (e.g. safety) is to be captured in their monthly reporting to AEMO. Each participant should be managing these matters within their organisational readiness program in order to be in a position to comply with their respective jurisdictional or contractual obligations. While the items listed are outside the Strategy's scope for planning and coordinating purposes, it is expected participants will report all relevant issues impacting their operational readiness, whether inside or outside the scope of the Strategy, in accordance with the reporting and monitoring processes overviewed in Chapter 6 and detailed in the Industry Readiness Reporting Plan. Any non-systems related readiness activities not already captured in the Strategy's associated plans or the monthly reporting template could potentially be captured by either extending the monthly reporting template or by developing a specific plan. <u>Conclusion:</u> Clarification made to section 1.3.3 of the Strategy regarding items outside scope. These matters are outside the Strategy's scope for planning and coordinating purposes. Participants should report all matters that impact their operational readiness in their monthly reporting to AEMO, as per the reporting and monitoring processes overviewed in Chapter 6 and detailed in the Industry Readiness Reporting Plan.

| 4 | Section 1.4, Principals of Market Readiness — None of the items in this section provide guiding principles that help us to determine when the Market is "Ready". Instead this list seems to be about behaviours and approaches to collaboration, which is fine but perhaps should be put under a differently named heading.

The Principles of Market Readiness should inform the Readiness Criteria that have been proposed Appendix B. They should address at a high level the following:
• What does it mean for a participant to be "ready"?
• What does it mean for AEMO to be "ready"?
• Is it necessary for every single participant to be ready for the market to be deemed ready? – If not what criteria will be used to judge which participants are critical?
• Is it necessary for all proposed services and transactions to be operational for the market to be deemed ready – If not what criteria will be used to select the critical transactions and services?
• What principles can help us select the critical hurdles (show stoppers) that must be cleared before the market can be deemed ready?
• What are key principles to guide us in dealing with a post go-live situation where most participants are ready, but some critical participants were found, after the event, to be not ready?

It is not necessary that this document list the final Readiness Principles/Criteria now – The document should however state that the Final Readiness Principles/Criteria will be an early deliverable of the POC-RWG. | Some principles will be developed in, and will be specific to, the associated plans referred to in the Strategy. For example, guidance in how to deal with a post "go-live" issue would be one of the principles to be defined in the Transition and Cutover Plan by AEMO in collaboration with industry.

To highlight the importance of being ready to comply with the revised market arrangements from the "go-live" date, an additional principle for market readiness has been included in section 1.4:
• "1. Readiness for 'go-live' – AEMO and NEM participants will perform all necessary activities such that each party will be in a position to comply with their respective obligations under the revised market arrangements from the 'go-live' date. Accordingly, the focus of market readiness is to coordinate preparatory activities, provide visibility of readiness issues and to appropriately plan for contingencies."

A near-final version of the Strategy, incorporating stakeholder feedback, will be provided to the POC-RWG for comment, after which AEMO will finalise the Strategy in September 2016.

Conclusion: Section 1.4 of the Strategy has been updated by including an additional principle for market readiness ("1. Readiness for 'go-live'"), as per the above edits. POC-RWG to comment on the revised Strategy at its meeting on 5 August 2016. |

5	Section 3.2, Key milestones for market readiness work stream: • Need milestones for publication and finalisation of Readiness Principles and Readiness Criteria (If not published in final form in this Strategy). • Need milestone for go/no-go decisions.	The principles for market readiness form part of the Strategy. A near-final version of the Strategy, incorporating stakeholder feedback, will be provided to the POC-RWG for comment, after which AEMO will finalise the Strategy in September 2016. The readiness criteria and monthly reporting template is to be developed by AEMO in collaboration with market participants, as part of the Industry Readiness Reporting Plan to be reviewed by the POC-RWG in August 2016 and finalised by AEMO by October 2016 (n.b. draft readiness criteria and a sample reporting template were previously included as Appendices B and C of v0.1 of the Strategy, but have been since been removed from the Strategy and included in their own plan – the Industry Readiness Reporting Plan) As per #6, there is no "go/no-go" decision for the POC Implementation Program. Conclusion: Table 2 of section 3.1 has been updated to include finalisation dates for the Strategy (September 2016) and Industry Readiness Reporting Plan (October 2016).
6	Section 4.1, Phase 1 Planning — Should mention development of the go/no-go Criteria.	There is no "go/no-go" decision for the POC Implementation Program. This is because the "go-live" date of 1 December 2017 for the POC rule changes has been enshrined in national energy rules made by the AEMC. This means that if AEMO and/or any other market participant did not "go-live" on this date – or in other words, did not comply with their regulatory obligations – they would likely be in breach of the rules and, thus, would likely become the subject of compliance action by the AER. Section 4.5.2 of the Strategy ("Readiness criteria for 'go-live'") notes that AEMO will employ a risk-based assessment process to ascertain whether AEMO and NEM participants are ready to "go-live" on 1 December 2017. Readiness criteria, along with reporting metrics and target levels (n.b. to be finalised as part of the Industry Readiness Reporting Plan) will be used to provide a standardised basis for monitoring the overall state of industry readiness. Conclusion: Refer to #4 (i.e. additional principle for market readiness has been included in section 1.4 of the Strategy).
7	Section 4.5, Phase 5 – Confirmation of operational readiness — Section 4.5.2 looks quite comprehensive and considers items beyond just systems – Suggest re-visit section 1.3.1 to bring it in line with this section.	Refer to #2 and #4. Information on the detailed operational activities that AEMO and NEM participants need to complete will either be included in the associated plans described in the Strategy, or managed in each party's own readiness program. Conclusion: Refer to #2 and #4.
8	Section 4.6, Phase 6 – Post "go-live" heightened support — This section needs to address more than just "heightened support" – It should propose an escalation framework and an approach to dealing with the circumstances where one or more participants are unable	As per #6, if AEMO and/or any other market participant is unable to comply with their regulatory obligations under the revised market arrangements from the "go-live" date, they would likely be in breach of these arrangements and, thus, would likely become the subject of compliance action by the AER.

	to operate as intended after go-live. How will the market continue to function if some participants are unable to function according to the changed rules on day one? What approach will be taken to resolving disputes about different interpretations on procedures and obligations that are resulting in Industry processes failing? Who will be the umpire?	The industry testing that AEMO will facilitate will help market participants test their operational readiness for "go-live" on 1 December 2017.

The process for dealing with some market activities (e.g. dealing with in-flight transactions at cutover time) are to be included in the Transition and Cutover Plan, for the purpose of ensuring a smooth transition to "go-live". This plan will detail how the post "go-live" heightened support period will operate and how the transition to business-as-usual (BAU) operations will occur. This was previously alluded to in section 4.4.1 ("Industry transition and cutover") but has now been made explicit by including a clarification in section 4.6 ("Phase 6 – Post "go-live" heightened support").

Any concern regarding differences in interpretation of certain procedures and obligations needs to be logged, as early as possible, by the concerned party in the risk register for action (e.g. escalation to the appropriate POC forum or discussion with the AER). Generally speaking, compliance with rules and procedures is a matter for the AER. Where there is a concern regarding ambiguity in the rules/procedures, it would be prudent to bring the concern to the AER's attention before any breach occurs.

<u>Conclusion:</u> Section 4.6 of the Strategy has been updated to reference the Transition and Cutover Plan, as per the above edits. |
| 9 | Section 5, Stakeholder engagement activities — The purpose and descriptions of the groups in this section are useful, it would be beneficial if this material was lifted up to support a description of the Stakeholder Interactions and Governance overview for the entire program as mentioned in relation to Agenda Item 2.2 earlier in this document. | Introduction to section 5.2 has been updated, plus inclusion of Figure 1, describing POC program stakeholder interactions.

<u>Conclusion:</u> Section 5.2 updated and new Figure 1 included in the Strategy, as per the above edits. |
| 10 | Section 6, Reporting and monitoring processes — As noted in comments related to Agenda Item 2.3 [21 June], AEMO may find it effective to utilise a collaborative cloud-based project reporting tools for the consolidation and dissemination of progress related information.

As there is a central risk and issue register, there also needs to be a central register of program dependencies, change requests, assumptions, milestones and completion status also. | As detailed in the Industry Readiness Reporting Plan, AEMO intends to use a spreadsheet-based reporting template, disseminated by email, for AEMO and market participants to report monthly on the progress of their readiness activities.

AEMO's program management office has administrative systems and processes in place for the management of project related matters as they arise.

<u>Conclusion:</u> Monthly spreadsheet-based reporting. AEMO project management systems and process are in place. |

11	We would be interested in AEMO conducting the "Key impacts of POC" training at our office, as well as online training. Maybe this could be conducted in two stages – say, in September 2016 and later when more Procedures are finalised in early 2017.	The indicative date in the Strategy for the "Overview of POC key obligations" training is October 2016, delivered in a half-day workshop format. AEMO will aim to prepare training materials and deliver all training workshops soon after procedures have been finalised (generally, within one month). As per Chapter 7 of the Strategy, AEMO intends to scope out the training program in collaboration with market participants so as to better understand the training needs of participants. AEMO will utilise the POC-RWG for this task. The training will focus on AEMO's procedure changes, set against the backdrop of the AEMC's POC rule changes. Conclusion: AEMO to scope out the participant training program with the POC-RWG.
12	Appendix B — Good draft list however need to consider some of the some of the feedback relating to principles suggested for section 1.4. Also needs to be reviewed by the POC-RWG before finalisation.	Draft readiness criteria and a sample reporting template were previously included as Appendices B and C of v0.1 of the Strategy, but have been since been removed from the Strategy and included in their own plan – the Industry Readiness Reporting Plan. AEMO will finalise the Industry Readiness Reporting Plan after the POC-RWG has provided comments. Conclusion: Table 2 in section 3.2 ("Key milestones for Market Readiness work stream") and section 6.1.1 ("Readiness Assessment Report") of the Strategy have been updated to note that the associated plan – the Industry Readiness Reporting Plan – will be developed in collaboration with industry with a target date of October 2016.
13	Appendix C – Broadly speaking, we believe that the content required to fulfil the report on a monthly basis is an unnecessary burden. We would prefer to update AEMO when there is an issue that may impede the implementation of POC. This approach would allow our staff to get the job done rather than creating multiple documents (impact assessments, roll-out plans etc.) for the purposes of providing a monthly update. A simple update when required approach would greatly assist us in meeting the delivery timeframes for the POC program.	Draft readiness criteria and a sample reporting template were previously included as Appendices B and C of v0.1 of the Strategy, but have been since been removed from the Strategy and included in their own plan – the Industry Readiness Reporting Plan. AEMO will finalise the Industry Readiness Reporting Plan after the POC-RWG has provided comments. Many of the sample reporting categories in Appendix C of v0.1 of the Strategy are likely to be monitored by participants on a regular basis for the purpose of informing, and reporting to, their own management on the progress of their implementation program (e.g. for resourcing and budgeting purposes). Progress reporting against the reporting categories is only expected where the information exists and is appropriate for the type of participant doing the reporting (e.g. they would only need to deploy, and report on, a readiness activity that is necessary for their business in order to be is a position to comply with their regulatory obligations from the POC "go-live" date). Also, regular reporting to AEMO using a standardised template is likely to become less onerous over time for participants as internal processes and relationships for obtaining the necessary information will be established. A report that is structured, regularly scheduled, provides meaningful information and is consistent across market participants is required by AEMO for the purpose of managing its POC Implementation Program effectively, in addition to helping AEMO to provide meaningful updates to interested stakeholders (e.g. market participants, government officials, other agencies). Reporting on an ad-hoc basis, or only when implementation issues arise, would limit AEMO's ability to manage its implementation work

| | | streams effectively. Additionally, implementation issues or risks observed by participants should be captured early in the POC issues and risk register for immediate action (i.e. in accordance with readiness principle #4).

As noted in section 6.1.1 of the Strategy, AEMO will not be validating the accuracy or integrity of the information provided to it by participants in their monthly reports. In accordance with readiness principles #3 and #6, each party is responsible for their own readiness and accuracy in reporting (including AEMO).

Conclusion: As per #12, the Industry Readiness Reporting Plan provide more details on the readiness reporting purpose and process. |
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| 14 | Appendix C — Assessment and preparation:
• 1.1 *The establishment of a POC implementation project to prepare your business* – due to the size of our businesses and resources available, we will not be setting up a project team per se to manage the implementation of POC. We therefore believe that this should be removed.
• 1.2 *A high level impact assessment of the POC changes on your organisation* – We will not be documenting an impact assessment for the implementation largely due to the fact that it will not assist us in rolling out the POC changes to our business. We suggest that this section be removed. | As noted in #13, progress reporting against the reporting categories is only expected where the information exists and is appropriate for the type of participant doing the reporting.

Some level of POC impact assessment would need to be undertaken by AEMO and each market participant in order to understand their respective regulatory obligations from the POC "go-live" date, or they would risk being in breach of the rules and procedures and, in turn, potentially the subject of AER compliance action.

Conclusion: See #13. |
| 15 | Appendix C — Legal, regulatory, contractual and policy:
• We do not see a benefit in providing AEMO with a monthly update on how we are progressing with internal procedures such as contracts and legal assessments. We are of the opinion that these are commercially sensitive matters that will be undertaken as part of BAU for the implementation of the program. | As noted in #13, a report that is structured, regularly scheduled, provides meaningful information and is consistent across market participants is required by AEMO for the purpose of managing its POC Implementation Program effectively, in addition to helping AEMO to provide meaningful updates to interested stakeholders (e.g. market participants, government officials, other agencies).

In accordance with readiness principle #7, AEMO will maintain the confidentiality of a participant, where requested, on matters that are specific to that participant's own readiness.

Conclusion: See #13. |
| 16 | Appendix C — People:
• Due to the size of our business, there will be no project team setup to manage the implementation of | As noted in #13, progress reporting against the reporting categories is only expected where the information exists and is appropriate for the type of participant doing the reporting. |

	POC. We may choose to engage a short-term contractor to assist with the roll-out, but if we choose to do this we see no benefit in reporting this to AEMO.	'Who' specifically does the work (i.e. staff member or contractor) is not important to AEMO from a reporting perspective. What is important is knowing that the participant: • has undertaken an assessment of their regulatory obligations, which may be changing from the POC "go-live" date; • understands the potential costs and risks to their business as a result of not complying with the updated rules and procedures from the POC "go-live" date, where their regulatory obligations are changing for POC; • has established an implementation project/plan that is appropriate for their business given their (changing) POC obligations; • has engaged (or has a plan to engage) appropriately skilled personnel to complete the necessary development work in accordance with a work plan before the POC "go-live" date, given their POC regulatory obligations. Conclusion: See #13.
17	Appendix C — Business process: • We believe that sections 4.2, 4.3 and 4.4 could be consolidated into one point.	These reporting categories have been kept separate as they represent distinct steps which will occur over a period of time: • Identification of process impacts – changes to process and/or new processes. • Development, documentation and approval of updated and new processes. • Validation of business processes during industry testing. Conclusion: See #13.
18	Appendix C — Market systems: • We believe that sections 5.1 to 5.3 will create an extensive amount of unnecessary work that rather than assist delivery, will impede delivery of the required changes for POC. • We believes that sections 5.5 and 5.6 could be consolidated. Furthermore, we believe that this does not require a monthly update. We believe that a simple update post testing between participants' interfaces is all that is required to give AEMO comfort on the progress.	These reporting categories have been kept separate as they represent distinct steps which will occur over a period of time. Progress reporting against the reporting categories is only expected where the information exists and is appropriate for the type of participant doing the reporting Conclusion: See #13 and #17.
19	Appendix C — Transition planning: • 6.2 *Preparation of participant transition and cutover plans* – We do not see the benefit in this requirement. Our plan is to cut over to the new process at the go live date.	Transition and cutover by one participant may affect other participants as well, so it needs to be coordinated. Progress reporting against the reporting categories is only expected where the information exists and is appropriate for the type of participant doing the reporting Conclusion: See #13.

	• 6.3 *Completion of any data migration activities and cutover dress rehearsals* – Similarly to the aforementioned market systems feedback, we believe this does not require a monthly update. We believe that a simple update post migration is all that is required to give AEMO comfort on the progress.	
20	*AEMO comment:* A participant suggested several edits, mostly cosmetic, to v0.1 of the Strategy in tracked markings.	Suggested edits have been included in tracked markings in v0.2 of the Strategy, as appropriate. Conclusion: Clarifications and minor changes made to the Strategy in various sections, as appropriate.
21	In relation to readiness principle #4 ("Communicate readiness issues and risks in writing") and section 5.3 ("How to raise readiness matters with AEMO"), a template should be developed to facilitate the reporting of risks and issues.	An email template for logging risks and issues – for inclusion in a register – will be developed by AEMO and will be available to participants from the POC section on AEMO's website. As overviewed at the industry workshop on 21 June 2016 in the "POC Implementation Program – Industry Plan: Risk & Issue Management" document, Chapter 6 (Risk & Issues Register) details where the register will be located and how updates to the register will be made. Conclusion: Section 5.3 of the Strategy updated to clarify an AEMO template for logging risks and issues will be available from the POC section of AEMO's website.
22	In relation to the Industry Test Plan (section 4.2.1), can we be clear on what "the scope of AEMO and NEM participant testing requirements (i.e. B2M, B2B and M2B)" means? Is it just transactional testing? The test Plan should cover: B2B e-hub certification requirements which, once successfully completed, would allow participants to enter B2B, B2M, M2B and/or Market Trial testing.	The scope of the industry testing requirements will be highly dependent on the scope of the IT changes in response to the rule changes. The Industry Testing Plan will be developed, in collaboration with industry, as this information becomes available. Conclusion: New section 4.2.2 ("Industry testing") has been included in the Strategy, providing clarification on what industry testing requirements are likely to entail.
23	Fundamentally, this document is unclear on the governance framework. Noting that the 'go live' date is already set, it's unclear what the decision making process to not go live is and what is done in that situation.	Governance clarified in section 5.2 and Figure 1. There is no "go/no-go" decision for the POC Implementation Program. Conclusion: See #4 (additional market readiness principle #1 included), #6 (no "go/no-go" decision) and #9 (governance).

24	Section 1.4 – Principles: The Issues/Risk process is assumed to be managed under the previous document, but this is not clearly specified.	As per #21, clarifications have been included in sections 1.4 ("4. Communicate readiness issues and risks in writing") and 5.3 ("How to raise readiness matters with AEMO") of the Strategy. Conclusion: See #21.
25	Chapter 2 – Background: This background could have been placed in an appendix. The key issue is the framework for readiness monitoring and reporting and should in many ways be agnostic of the various rule changes.	Including the background information in an appendix was originally considered, however it was decided that including high-level summaries of the rule changes would provide useful context for stakeholders. Either approach could be justified. Conclusion: Chapter 2 ("Background on POC reforms") has been included for context purposes only. Further information and detail on the POC related rule changes could be obtained from the AEMC final rule determinations.
26	Chapter 3 – Timeline: The separate work streams need to be merged into a single timeline for proper consideration of program. For instance, can some of the training be provided/undertaken when decisions in that matter are still being made?	Chapter 3 ("Overview of market readiness strategy") of the Strategy has been updated to reflect the suggestion. As per #11, AEMO will aim to prepare training materials and deliver all training workshops soon after procedures have been finalised (generally, within one month). Conclusion: Sections 3.1 and 3.2, and associated tables, consolidated into a revised section 3.1. Also, see #11 regarding training.
27	Section 3.4 – There is nothing noted in the process about how industry will feed its view into the reporting process, particularly if the perspective differs from AEMO.	Section 3.4 notes that, "AEMO will report to industry…on the progress of the market readiness activities for industry as a whole." The inference here is that AEMO and industry will discuss the aggregated monthly reports in industry forums, as appropriate, thereby providing industry an opportunity to comment on the information presented in the reports. This has been clarified in sections 3.4 and Chapter 6 ("Reporting and monitoring process"). Conclusion: Section 3.3 and Chapter 6 of the Strategy have been clarified by noting AEMO's aggregated monthly reports will be reviewed and discussed in industry forums, as appropriate.
28	Section 3.5 – Industry education: By the time that AEMO starts this process, industry will have responded to two procedure change packs. The education may be useful, but it would be very worthwhile to canvass participants and new entrants to determine what content would be of use.	As per #11, and as noted in Chapter 7 of the Strategy, AEMO intends to scope out the training program in collaboration with market participants so as to better understand the training needs of participants. Conclusion: See #11.
29	Chapter 4 – It would be useful to have a more detailed set of meeting dates considered and added to the industry	As noted in the Strategy, detailed readiness activities (including specific dates and milestones) will be developed by AEMO, in collaboration with industry, in the associated plans (e.g. Industry Testing Plan) referenced in the Strategy.

	calendar in advance, so parties can schedule their time for these readiness meetings.	POC-RWG meetings will be coordinated to occur on, or close to, the POC workshop placeholder dates highlighted in the AEMO Industry Meeting Schedule (http://www.aemo.com.au/About-the-Industry/Working-Groups). Conclusion: Meeting dates to be aligned with AEMO's Industry Meeting Schedule, where possible.
30	Section 4.2 – In order to undertake industry testing, a series of scenarios are needed. These will need to be developed in concert with the B2B/SMP development and therefore have a link to that program of work. We strongly support the concept of market trial as there are multiple participants who need to operate together.	Section 4.2.3 ("Market trial") of the Strategy has been updated. Also, as per #29, this level of detail (scope, requirements) will be developed as part of the associated plans (e.g. Industry Testing Plan) referenced in the Strategy. Conclusion: Section 4.2.3 ("Market trial") of the Strategy has been updated.
31	Section 4.3 – Accreditation – Isn't it likely that this will largely need to occur prior to market trial. The dependencies for this series of activities need to be considered and established.	There may be some overlap between the six phases of market readiness overviewed in Chapter 4. Also, as per #1, the finer details of the Strategy are to be developed by AEMO in collaboration with participants. This will be done through developing the associated plans, including for accreditation (i.e. Accreditation and Registration Plan). Conclusion: See #1.
32	Section 5.3 – Wouldn't readiness matters be best dealt with through the issues/risk process?	As per #21, a clarifying comment and footnote has been included in the Strategy directing parties to use the template for logging risks or issues in the POC Risk and Issues Register. Conclusion: See #21.
33	Chapter 6 – As per the suggested proposal by an attendee at the 21/6/2016 industry workshop, some indication of the expected readiness position at a point in time would be useful as a validation tool for all parties.	Readiness position is specific to, and will vary between, AEMO and market participants based on their respective regulatory obligations and the extent of changes they need to implement to be compliant with the revised procedural arrangements from 1 December 2017. Accordingly, the expected readiness position will be highly dependent on the participants own implementation program/plan, and participants would be expected to report against progress against their own program. This form of readiness measurement is embedded in the reporting template included in the Industry Readiness Reporting Plan. That is, for each key readiness activity, each party is requested to report on the amount of work they have completed relative to the planned completion milestone set out in their organisation's readiness program (traffic lights) and proportion of work completed (Harvey balls): • Green – Activity is within schedule. • Amber – Activity is at risk of not being within schedule, requiring action. • Red – Activity is not within schedule. • Harvey balls – Indicating which completion quadrant they are in (25, 50, 75 or 100%).

		The reporting template could be refined further when finalising the readiness metrics and reporting templates. Conclusion: As per the template contained in the Industry Readiness Assessment Report, AEMO and each participant will report monthly on how their organisational implementation activities are progressing relative to the work schedule set out in each organisation's plan.
34	Section 6.2.3 – The reporting only considers the AEMO Board. What about the other key decision makers?	AEMO's aggregated monthly market readiness reports will be publically available on AEMO's website. Project reporting is to AEMO's Board because the POC Implementation Program is an AEMO-established program of work and associated expenditures. Other key stakeholders, such as the IEC, will receive project updates from the project team, as and when requested. Conclusion: AEMO to publish aggregated reports monthly. Also see #27.
35	Appendix C (Market Testing) – It isn't clear if the Market Systems testing includes end-to-end testing or simply interface testing. The description seems to be predominantly interface testing, rather than end-to-end testing of key processes. We would suggest that end-to-end testing of key processes will be required to ensure that Participants are in a reasonable state of readiness.	Detail to be clarified in the Industry Testing Plan. Conclusion: AEMO to develop the Industry Testing Plan in collaboration with industry.
36	In general, this is a high level document and we understand that this will be developed as the PoC program progresses. It is necessary for the strategy to indicate the dependencies for each of the Milestones, with procedures being consulted upon in parallel to training sessions. In relation to planning resourcing appropriately, it will be beneficial for working group workshop dates to be confirmed at least two months ahead where possible. In addition, a key factor for us to have clarified by AEMO is what the scope of 'Go Live' entails, as soon as possible.	To clarify, the Strategy is a "high level document" in terms of it being an overarching strategic document that outlines future market readiness activities, including reference to associated plans (e.g. Industry Testing Plan) that AEMO will develop in collaboration with industry as the POC Implementation Program progresses. The associated plans will also detail the activities and dependencies for key milestones. As per #11, and as noted in Chapter 7 of the Strategy, training workshops are planned to be delivered by AEMO soon after finalisation of the related procedures, not in parallel to consultation on procedures. To deliver training before procedures are finalised means the accuracy of the training materials cannot be guaranteed. See #29 regarding POC-RWG meeting dates. Generally speaking, the scope of "go live" entails AEMO and market participants acting in accordance with their respective obligations under the revised regulatory arrangements from 1 December 2017 (e.g. see the AEMC's four POC related final rule

		determinations, and engage in AEMO's POC related procedure development over the next year). Also, see additional readiness principle #1 which has been included in the Strategy. Conclusion: See #4 (readiness principle #1), #11 (training) and #29 (meeting dates).
37	Section 3.2 – Table 2: Consider including a clear view of key process change impacts within the training sessions planned for October and November 2016 to enable industry to plan ahead as much as possible.	As per #11, AEMO intends to scope out the training program in collaboration with market participants so as to better understand the training needs of participants. Conclusion: See #11.
38	Section 4.2 – We strongly support the suggestion to conduct a market trial and include participants plus AEMO to ensure end-to-end testing is carried out appropriately.	Conclusion: See #30.
39	Section 4.3 – More clarity is required around timings and dependencies of accreditation and registration to give industry enough preparation time, and to highlight that it needs to take place before market trial.	Conclusion: See #31.
40	Section 4.5.1 – Confirmation of AEMO readiness by Oct/Nov 2017 – AEMO to consider bringing this forward to give industry more certainty to plan/budget more accurately in the lead up to "Go Live".	AEMO's POC Implementation Program sets out the high-level timings for work to be conducted under the Procedural, Technical and Market Readiness work streams. It is not always possible to bring forward dates because certain activities must be completed in sequence (e.g. completion of procedures, completion of system build, completion of industry testing). As noted in the Strategy, AEMO is expected to confirm its operational preparedness for the 1 December 2017 "go-live" date in late October / early November 2017. This is an indicative time period. AEMO will confirm its operational preparedness as soon as it can, subject to the completion of other sequenced activities that are part of its broad and complex POC Implementation Program. This highlights the importance of accurate monthly reporting. AEMO, like every other market participant, will prepare monthly reports on its readiness progress. Participants will have access to AEMO's aggregated monthly readiness assessment reports, and so can use this information to inform their planning and budgeting. Conclusion: More information on the progress of AEMO and participants' readiness activities will be provided in the monthly readiness reports. Also see the Industry Readiness Reporting Plan for the reporting templates (readiness criteria and metrics).

41	Section 5.1 – POC RWG – Please clarify when will ToR's be released; how frequently the working group will meet and what start date is envisaged. It is stated that 'AEMO will facilitate working groups and workshops as required' – We require reasonable notice of any new working groups being considered to address systems, IT development/testing, as indicated in a separate document: 'Program Stakeholder Interactions' diagram within the 'as required' box.	See #1 regarding establishment of the POC-RWG, and #29 regarding the timing of POC-RWG meetings and related workshops. Conclusion: See #1 and #29.
42	Section 5.2 – POC Program Consultative Forum – Clarity required on how the interaction with IEC will work and related governance.	See #1 regarding terms of reference distributed for POC-PCF, and #23 regarding POC-PCF governance arrangements. Also, note that terms of reference for the POC B2B Working Group was distributed on 11 July 2016. This working group will become a formal working group of the new IEC once established (as per the National Electricity Rules (NER)). Conclusion: See #1 and #23, and terms of reference for the POC B2B Working Group.
43	Chapter 6 – Already highlighted at the 21 June 2016 PoC workshop, agree with the suggestion made for AEMO to state what % completion is expected for milestones at key dates as a guideline for industry to aim for.	Conclusion: See #33.
44	Section 6.1 – Reporting – Greater clarity required on the format and any evidencing requirements.	See information provided in the Industry Readiness Reporting Plan, including the reporting templates. AEMO will finalise this plan in collaboration with the POC-RWG. As per #10, AEMO intends to use a spreadsheet-based template, disseminated by email, for AEMO and market participant monthly progress reporting on readiness activities. As per #13, AEMO will not be validating the accuracy or integrity of the information provided to it by participants in their reports. Conclusion: See the Industry Readiness Report Plan, #10 and #13.
45	Section 6.2 – Reporting to AEMO board – Will the report be fed in to the IEC too?	Conclusion: See #34.

46	Appendix B and C – Further breakdown of key tasks to be developed. Please clarify if documentation/evidence will be required of participants when submitting report (in addition to the stated traffic light method and % completion for each category).	Conclusion: See #44.