



19 June 2018

Australian Energy Market Operator

By email: NEM.Retailprocedureconsultations@aemo.com.au.

To Whom It May Concern

B2B Procedure Changes: Notice of Second Stage Consultation

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.

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.

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 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.

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.

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.

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 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.

If you have any further queries please feel free to contact me.

Yours sincerely

Ed McManus

CEO

Powershop Australia Pty Ltd