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B2B Change Process

B2B Procedures

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1 INTRODUCTION

Under the National Electricity Rules (NER), the Information Exchange Committee (IEC) is responsible for managing the ongoing development of the Business-to-Business (B2B) Procedures and any changes to them.

The IEC has established the Business-to-Business Working Group (B2B-WG) to assist in the review and analysis of B2B Procedures, assess change requests and provide expert advice to the IEC.

The B2B-WG Terms of Reference set out how the B2B-WG will engage with Participants and interested parties to assist the IEC with managing the change process for B2B Procedures.

2 B2B CHANGE PROCESS

2.1 Purpose

The purpose of this document is to describe the B2B Change Process relating to B2B Procedures.

This document sets out the following:

a) Governance arrangements, roles, and responsibilities of the IEC, B2B-WG, Australian Energy Market Operator (AEMO), and different industry bodies within the National Electricity Market (NEM);
b) The process for managing changes and issues via the IEC and B2B-WG;
c) The timeframes associated with the change process; and
d) The tools and requirements to assist in the development of the Issue / Change Form (ICF) submission to the IEC.

2.2 Intended Audience

The following table contains information regarding the intended audience for this document.

Type	Role in consultation
B2B-WG	B2B-WG members will provide advice and assistance to the IEC throughout the consultation process on any B2B Procedure change. They may also themselves want to bring forward changes to B2B Procedures to the IEC.
Market Participants	Market Participants may identify changes to B2B Procedures that they believe to be beneficial and will need to understand the change process and the ICF in order to propose a change.
Participant operational and project teams	Participant operational and project teams managing change activities. This audience will need to have an understanding of the B2B change process to effectively plan for B2B changes or to identify market-related issues and future changes.
Interested parties	Interested parties may want to be kept informed of B2B Procedure changes but may not necessarily require or initiate changes themselves, e.g. peak bodies, jurisdictional bodies and consumer groups.

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2.3 Scope

This document details the business-as-usual (BAU) change process for B2B Procedures under the Rules consultation procedures (section 8.9 of the NER).

From time to time, special projects may be established to deliver broader market reforms across a number of processes and Procedures. The IEC may establish working groups to assess changes to processes and Procedures and will provide direction as required.

2.4 B2B Change Process

This change process has been developed to support the implementation of B2B Procedure changes that have regard to the B2B Factors, the B2B Principles, the National Electricity Objective (NEO), and (where the change relates to provisions in the National Energy Retail Law (NERL) or National Energy Retail Rules (NERR)) the National Energy Retail Objective (NERO):

B2B Factors National Electricity Rules Chapter 10	The following factors: (a) The reasonable costs of compliance by AEMO and B2B Parties with the B2B Procedures compared with the likely benefits from B2B Communications; (b) The likely impacts on innovation in and barriers to entry to the markets for services facilitated by advanced meters resulting from changing the existing B2B Procedures; and (c) The implementation timeframe reasonably necessary for AEMO and B2B Parties to implement systems or other changes required to be compliant with any change to existing B2B Procedures.
B2B Principles National Electricity Rules Chapter 10	The following principles: (a) B2B Procedures should provide a uniform approach to B2B Communications in participating jurisdictions; (b) B2B Procedures should detail operational and procedural matters and technical requirements that result in efficient, effective and reliable B2B Communications; (c) B2B Procedures should avoid unreasonable discrimination between B2B Parties; and (d) B2B Procedures should protect the confidentiality of commercially sensitive information.
National Electricity Objective National Electricity Law (NEL) Section 7	The objective of this Law is to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to; price, quality, safety, reliability and security of supply of electricity; and the reliability, safety and security of the national electricity system.
National Energy Retail Objective National Energy Retail Law (NERL) Section 13	The objective of this Law is to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy.

The B2B Change Process details the steps for the initiation, assessment, and progress of B2B Procedure changes, beginning with problem identification and ending with the start of the

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implementation period. The process aims to standardise the way in which the IEC engages with industry on potential changes.

The objective of the pre-consultation process is to validate proposed changes as robust and appropriately detailed before proceeding to formal consultation. In this way, extensive changes to proposed solutions are avoided wherever possible during the formal consultation process.

2.5 Related Documents

The following documents are relevant to the B2B Change Process and can be found on AEMO's website. NER clause 7.17.7(a)(2), outlines the IEC's responsibility to manage the ongoing development of and any changes to the documents marked with '*'. More information on the IEC's relationship to thesedocuments can be found in NER clause 7.17.7.

#	Document Name
1	IEC Election Procedures and Operating Manual
2	Business-to-Business Working Group Terms of Reference
3	B2B Issues Change Form (ICF) template
4	Retail Electricity Market Glossary and Framework
5	Guide to MSATS B2B
6	B2B Guide
7	*B2B Procedure Customer and Site Detail Notification Process
8	*B2B Procedure Service Order Process
9	*B2B Meter Data Process
10	*B2B Procedure One Way Notification Process
11	*B2B Technical Delivery Specification
12	*NEM RoLR Process – Part B – B2B Procedure RoLR Process

2.6 Change Register

The IEC Secretariat maintains a change register for BAU changes that are proposed to the IEC. The change register forms the basis of work for tracking purposes and for highlighting high-level information (e.g. description, proponent details, status, next steps and milestone dates).

3 GOVERNANCE

3.1 Business-to-Business Working Group

The B2B-WG is a group established by the IEC to provide advice and recommendations on the development of proposed change submissions on B2B Procedures.

3.2 B2B Procedures

The IEC has the obligation to establish and maintain B2B Procedures under Chapter 7, Part H, clause 7.17.7 of the NER. AEMO has the obligation to publish current B2B Procedures under clause 7.17.7(f) of the NER. B2B Procedures are amended under clauses 7.17.4 and 7.17.5 of the NER.

4 CHANGE PROCESS STEPS

The B2B Change Process seeks to provide a standardised method to manage B2B-related changes in the NEM that provides an engagement framework for industry stakeholders.

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4.1 Concept to Consultation

The 'Concept to Consultation' process is designed to engage with Participants and interested parties in a collaborative way, seeking advice and feedback regarding proposed market efficiencies prior to commencement of the formal Rules consultation stage. The 'Concept to Consultation' ICF process does not replace the Rules consultation procedures governed by the NER.

ICF 'Concept to Consultation' timing is dependent on the complexity of the change and prioritisation by the IEC.

The process flow from submission of the Issue Change Form (ICF) to the IEC through to the completion of the consultation pack ready for formal consultation (refer to section 4.3) is an important engagement process providing early visibility of potential changes. Process time is required to ensure all relevant details of the change management process are completed and aims to ensure that:

i. Any changes to the ICF are visible to the proponent.
ii. Due diligence and attention to detail is undertaken.
iii. Changes consider and have regard to B2B Factors, B2B Principles, the NEO, and (where the change relates to provisions in the NERR or NERL) the NERO.
iv. Changes have the relevant 'head of power' under the NEL, NER, NERL, NERR, and any relevant jurisdictional codes or legislation.
v. Material changes are reviewed by the AEMO's legal group prior to consultation.

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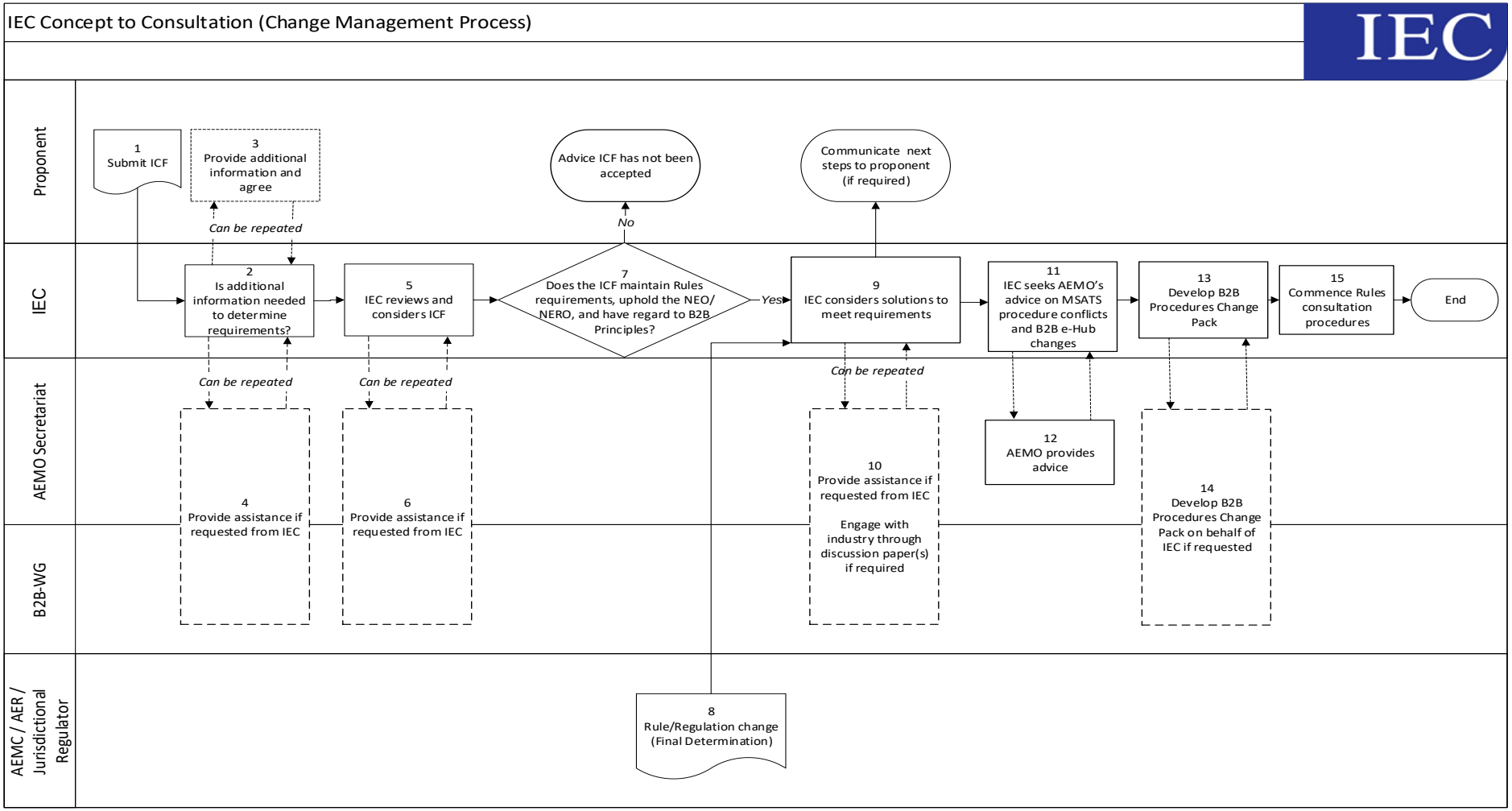
4.2 B2B Procedure Pre-Consultation Change Process Flow

The following diagram illustrates the BAU Concept to Consultation phase, from submission of the ICF through to the commencement of the formal Rules consultation procedures.



4.2.1 Step 1: Submit Issue / Change Form (ICF)

4.2.1.1 Purpose

- To provide a clear set of requirements, supporting information, and possible solution options in a standardised format (the ICF template is designed to ensure that sufficient information is provided to enable the IEC to validate the change request).
- The ICF should provide sufficient information to give a preliminary estimate of the costs and benefits of the proposal to the NEM.

4.2.1.2 Process

- Using the ICF template, the proponent completes each section by providing sufficient detail with clear and specific business requirements. Submit the completed ICF to the IEC via iec@aemo.com.au. Additionally, if a participant requires assistance in completing an ICF so that it meets ICF requirements, they are able to contact the IEC Secretariat at iec@aemo.com.au.

Ownership	• The proponent, who is entitled to be any person except the IEC itself.
	  ○ A member of the IEC may submit an ICF to the IEC in their capacity as an individual or on behalf of their member organisation.
	  ○ An individual who is in the B2B-WG may submit an ICF in their capacity as an individual or on behalf of their member organisation.
	  ○ The B2B-WG may also submit an ICF to the IEC; if this is the case, refer to Section 4.3 for additional details. If the B2B-WG submits an ICF, it is expected that the "Concept to Consultation" process will proceed very quickly, as many of the steps will have been addressed before ICF submission.
	• The ICF must clearly state on whose behalf the proponent is submitting (e.g. on behalf of the B2B-WG, on behalf of their member organisation, and so on).

Inputs	• A successfully completed ICF. Section 5 provides further detail to assist in completing an ICF.
Outputs	• The completed ICF is submitted to the IEC for review and consideration. Note: The ICF should only contain changes to B2B Procedures. If the proponent wishes to propose changes to MSATS, Metrology, or Service Level Procedures, then they should submit separate ICFs for those Procedures to the relevant reference group(s).
NER clause governing step	• 7.17.4(f)

4.2.2 Steps 2–6: IEC reviews and considers ICF, confirms with proponent and B2B-WG

4.2.2.1 Purpose

- To determine if the proposed ICF has been completed correctly.
- To determine that the IEC and the proponent agree on what would be required to address the change.

- To determine if the proposed ICF maintains the obligations set out in the NER having regard to the B2B Factors, the B2B Principles, the NEO, and (where the change relates to provisions in the National Energy Retail Law or National Energy Retail Rules) the NERO.

4.2.2.2 Process

- The IEC will review and consider changes proposed by a proponent, taking into account the proponent's identified requirements, any supporting information, and potential solution options. As part of the initial review, the IEC will review and assess whether the proposed change maintains the obligations set in the NER and upholds the B2B Factors, the B2B Principles, the NEO, and (where the change relates to provisions in the National Energy Retail Law or National Energy Retail Rules) the NERO.
- The IEC will review each section in the ICF to ensure it has been completed with enough detail for assessment.
- IEC assessment will include obtaining initial input from AEMO's and (if necessary) Participants' legal, operational business, and IT teams. If further information is required regarding the proposed changes/requirements in the ICF, the IEC will request further information from the proponent.
- The IEC may seek advice from the B2B-WG to determine the requirements for and necessity of the change. There can potentially be several rounds of consultation between the IEC and the B2B-WG. If the IEC requests the B2B-WG's advice, the specific tasks required from the B2B-WG will be set out in the IEC's request.

Ownership	• IEC • AEMO Secretariat • B2B-WG • Proponent
Inputs	• Completed ICF
Outputs	• Decision regarding whether the IEC will proceed with the change (must be reached within 25 business days of receiving the original ICF)
NER clause governing step	• 7.17.4(g)

4.2.3 Step 7: IEC gives notification of rejection/procession

4.2.3.1 Purpose

- To communicate to the proponent whether the change has been accepted.

4.2.3.2 Process

- The IEC will notify the proponent whether the change will be proceeding further in the consultation process.
- If the IEC decides not to proceed with the change, they must give within five business days give a notification of its decision, which must contain a reason why the change was not proceeded with. This may include instructions for resubmission if the ICF was incomplete.

Ownership	• IEC • Proponent
Inputs	• Notification of decision

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Outputs	• Rejected change request (proponent must be notified within five business days of the IEC's decision), or • Proceeding change request
NER clause governing step	• 7.17.4(h) • 7.17.4(i)

4.2.4 Step 8: Rule / Regulation change (Final Determination)

4.2.4.1 Purpose

- The relevant body makes or amends rules, regulatory guidelines and / or jurisdictional codes to advance energy market reforms for the benefit of consumers. Specifically relevant where the regulatory changes have a direct impact on B2B Procedures or systems.

4.2.4.2 Process

- The AEMC, AER, or jurisdictional bodies develop and consult on regulatory changes.

Ownership	• AEMC • AER • Jurisdictional bodies • AEMO • ACCC
Inputs	• Rule change or government policy change
Outputs	• Final Determination of rule, regulatory guidelines, or jurisdictional code change
NER clause governing step	• N/A

4.2.5 Steps 9–10: IEC considers solutions to meet requirements

4.2.5.1 Purpose

- To determine the solution(s) to be included in the B2B Proposal.

4.2.5.2 Process

- The IEC determines a final set of solution(s) to be consulted on. In accordance with NER clause 7.17.4(i)(1), these may differ from the solution(s) identified in the ICF.
- The IEC may request advice from the B2B-WG regarding the solutions to be consulted on. This may include the B2B-WG developing potential solutions (in coordination with industry), canvassing industry opinion on a set of potential solutions, or other methods as identified by the IEC in their instructions to the B2B-WG.

Ownership	• IEC • AEMO Secretariat • B2B-WG
Inputs	• ICF that has been approved to proceed
Outputs	• Identified solution(s) to be drafted in B2B Procedures Change Pack
NER clause governing step	• 7.17.4(i)

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4.2.6 Steps 11–12: IEC considers solutions to meet requirements

4.2.6.1 Purpose

- To ensure that the proposed changes to B2B Procedures do not conflict with MSATS Procedures and to determine whether changes are required to the B2B e-Hub.

4.2.6.2 Process

- The IEC engages with AEMO to ensure that proposed changes to the B2B Procedures do not conflict with MSATS Procedures and requests AEMO to determine whether changes are required to the B2B e-Hub (and, if so, the likely costs of making such changes).
- In practice, this will likely be done jointly with Steps 8–9

Ownership	• IEC • AEMO Secretariat
Inputs	• Identified solution(s) to be drafted in B2B Procedures Change Pack
Outputs	• Identified solution(s) to be drafted in B2B Procedures Change Pack, confirmed by AEMO not to conflict with MSATS Procedures • Cost estimates (if applicable) of changes to B2B e-Hub
NER clause governing step	• 7.17.4(i)

4.2.7 Steps 13–14: Develop B2B Procedures Change Pack

4.2.7.1 Purpose

- To develop a B2B Procedures Change Pack for distribution to industry.

4.2.7.2 Process

- The IEC, assisted by the B2B-WG (or other parties as nominated by the IEC) and AEMO Secretariat, must produce a B2B Procedures Change Pack, which consists of:
    - A B2B Proposal.
    - A report setting out an overview of the likely impact of the B2B Proposal on AEMO and B2B Parties.
    - Draft B2B Procedures (incorporating proposed changes in mark up, where appropriate).
    - An issues paper outlining the B2B Proposal being proposed.
- If the B2B-WG (or other parties as nominated by the IEC) and the AEMO Secretariat are primarily responsible for drafting this document, then the IEC will have to endorse proceeding to consultion.

Ownership	• IEC • B2B-WG • AEMO Secretariat
Inputs	• Identified solution(s) to be drafted in B2B Procedures Change Pack, which has been confirmed by AEMO not to conflict with MSATS Procedures
Outputs	• B2B Procedures Change Pack
NER clause governing step	• 7.17.4(i)

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4.2.8 Step 15: Commence Rules consultation

4.2.8.1 Purpose

- To engage with all stakeholders and gain a comprehensive understanding of the potential impacts of decisions. During formal consultation, engagement with stakeholders is conducted by seeking written submissions and participation in meetings or forums if necessary.

4.2.8.2 Process

- See Section 4.4

Ownership	• IEC • B2B-WG • AEMO
Inputs	• Approved B2B Procedures Change Pack
Outputs	• Rules consultation
NER clause	• 7.17.4(j)

4.3 B2B-WG ICF development process

The IEC has tasked the B2B-WG with "providing advice to the IEC about issues and opportunities relating to the B2B framework and impacts on participants" and with "representing and consulting with other participants regarding the development of B2B Procedures and B2B Guide changes". This can involve the identification of a B2B issue before a participant has submitted an ICF or before a rule change has been issued. The B2B-WG may therefore choose to submit an ICF to the IEC regarding the solution to the identified B2B issue, which commences the Concept-to-Consultation process outlined in Section 4.2.

The following provides an outline of the steps that the B2B-WG (or other parties as nominated by the IEC) may take in developing an ICF for submission to the IEC; this is indicative only, and the B2B-WG is able to deviate from this process at its or the IEC's discretion.

4.3.1 Discussion paper

B2B-WG members are required to engage with their broader membership category (i.e. retailer members with retailers, metering members with MPs, MCs, and MDPs, and distribution members with LNSPs) on any proposed B2B changes. In instances where the B2B-WG is not presenting a straightforward or otherwise uncontroversial change, however, this informal engagement may not be sufficient to determine requirements for a solution to a B2B issue. In such an instance, the B2B-WG may want to issue a discussion paper.

The discussion paper should identify potential benefits and costs (in a broad and approximate sense) for a given change as well as whether proposed changes to transactions or Procedures are adequate to meet requirements. The timing for this discussion paper consultation will depend on the complexity and substantiality of the change.

4.3.2 AEMO technical review

The B2B-WG (or other parties as nominated by the IEC) may consult AEMO's technical SMEs regarding any questions they may have about changes to the B2B e-Hub or other technical matters

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as required. It is generally expected that this would be completed between B2B-WG meetings, though this would depend on the complexity and substantiality of the change.

4.3.3 Other working groups

The B2B-WG may request information or pass changes to other working groups as required; in particular, the B2B-WG may liaise with the aseXML Standards Working Group on any change that is likely to have substantial IT implications. The time taken for any requests to be actioned by other working groups will depend on the complexity and substantiality of the change.

4.3.4 Draft transactions and / or procedure changes

While track-changes versions of relevant changed Procedures are not formally required as part of the submission of an ICF, given that the B2B-WG has access to AEMO's legal and technical SMEs for review purposes, the B2B-WG should in most instances include them when submitting an ICF to the IEC to expedite the process outlined in Section 4.2.

4.4 Rules consultation procedures

The following Consultation Procedure flow diagram provides a high-level overview of the governance, key stages and timeframes of a standard Rules consultation. The formal consultation phase of many consultations is completed within five to six months, though the entire process (Concept-to-consultation through to final implementation) can take significantly longer, depending on the complexity of the change.

During the formal Rules consultation, the proponent engages with the consultation in the same manner as does any other consulted party: namely, by providing submissions during the initial consultation and draft determination consultation phases.

Further information on the Rules consultations procedures can be found in Section 8.9 of the NER.

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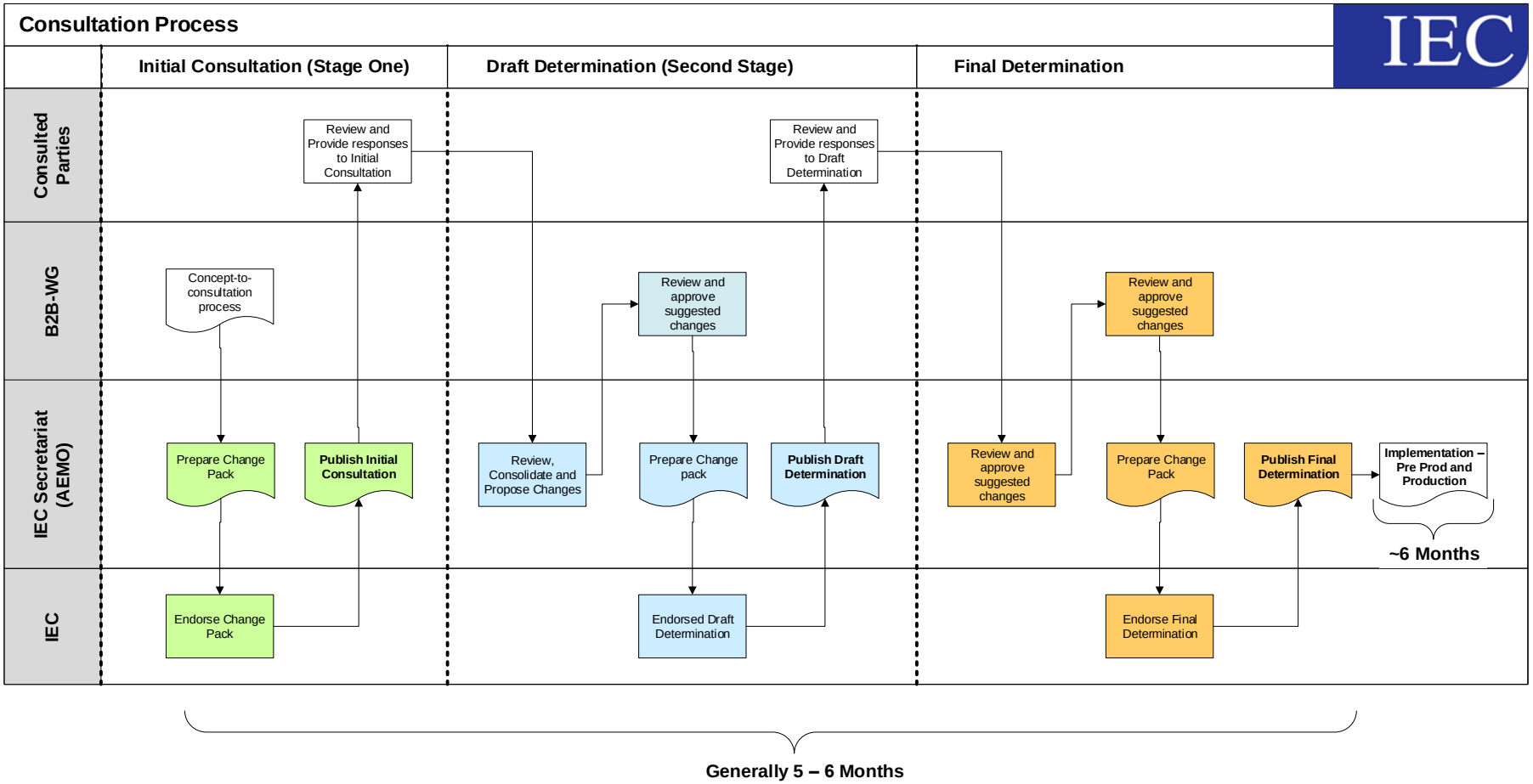

Generally 5 – 6 Months

5 ISSUE / CHANGE FORM (ICF)

An ICF should be developed providing information consistent with section 5.1 using the B2B ICF template.

The IEC may choose, from time to time, to amend the acceptance criteria either for the purpose of improving criteria or for the purpose of addressing project specific requirements.

5.1 ICF Acceptance Criteria

The ICF acceptance criteria is broken down into the following components:

i. Completeness
   - Each section of the ICF will need to be filled out in accordance with the table below.

ii. Content
   - Where no information is provided in a section of the ICF, the IEC may request further information from initiating proponent if required, prior to making any decision.

The ICF template consists of 10 fields incorporating the criteria and descriptions detailed below.

Field	Description
Issue Number (AEMO to complete)	A Unique ID allocated by the IEC Secretariat following submission of the ICF. This part should be left blank.
Version #	The version number of the ICF when submitted. The initial version of the ICF submitted should be captured as Version 1.0
Proponent name Proponent title Company Proponent contact no Proponent email	List of details identifying the ICF proponent, their organisation and their direct contact details.
Short description/title	A short title capturing the nature of the ICF being submitted.
Procedure(s) impacted	The list of the area(s) impacted in the B2B Procedures (e.g. section number).
Areas impacted	A list of affected section / clause numbers in the relevant procedures.

Detailed description of issue / change	A comprehensive overview should include the context of issue or proposed change and any validation or evidence of issues (e.g. data volumes or transaction volumes and associated details that validate and support the issue / change tabled in the ICF).
Market impact	A list of impacted parties detailing how they are impacted by the current issue.
Requirements / specific proposal	A clear list of requirements also specifying who will be impacted by the change. Requirements must clearly state the customer or business need. Requirements should be written in business language and should avoid describing solutions.
Proposed solution/s	One or more proposed solutions or options can be provided. Proposed solutions must be clear, identifying impacted processes, transactions and/or data.
Market benefits for industry as a whole	Clear list of tangible benefits that are expected to be delivered as a result of a change and as a minimum, how the change meets the B2B Principles, the NEO, and (where the change relates to provisions in the National Energy Retail Law or National Energy Retail Rules) the NERO.
Customer benefits (consumers)	The real or perceived value a customer will receive. Customer benefits may include resolution of a problem, achievement of a desired customer outcome, fulfilment of a need, or positive customer experience as a result of the change.
Workaround(s) (if applicable)	Where provided, a detailed description of the work around processes and any details associated with bilateral arrangements that support a work around (if applicable).
Supporting documentation	Where provided, a list of document titles and version numbers for ease of reference and the documents referenced that relate to the matters described in the ICF.
Any critical timelines to consider?	Potential dependencies or links with other market changes, proposed effective dates and consultation date/s etc.
IEC's preliminary assessment of the proposal	This part should be left blank.

5.2 Accepting / Rejecting the ICF

An ICF that is complete and where the content is deemed to be adequate by the IEC will be processed by the IEC in accordance with this document (i.e. it will proceed to Step 6 / 7 in the above flow chart). The IEC Secretariat will allocate a unique reference for traceability throughout the lifecycle of the ICF and notify the proponent that the ICF has been accepted.

The IEC reserves the right to reject an incomplete ICF or any ICF proposing changes that are contrary to any Rules obligations or fail to uphold the objectives of the B2B Principles, the NEO, and (where the change relates to provisions in the NERL or NERR) the NERO. If an ICF is rejected, the IEC will sent to proponents a notification indicating that the proposed ICF has not been accepted and, where necessary, any guidance for resubmission where further information is required.

6 APPENDIX A – ICF TEMPLATE

6.1 Naming Convention:

When the IEC Secretariat saves the ICF, the following naming standard will be followed for universal tracking:

Unique QC Identifier – ICF – *Short title*.docx

For e.g. 999 – ICF – Retro Transfer Issue.docx

6.2 Template

The following template is to be completed by the proponent for review and action by the IEC, the B2B-WG (or other parties as nominated by the IEC), and the IEC Secretariat.

NEM B2B Issue-Change Form

ISSUE / CHANGE FORM – SUMMARY SECTION *(Template focuses on issue/change identification and impact.)*

Issue number (AEMO to complete)			
Version #			
Proponent name		**Company**	
Proponent title		**Proponent contact no**	
Proponent email		**Date lodged with AEMO**	
Procedure(s) and other documents impacted	☐ B2B Procedure Customer and Site Details Notification Process ☐ B2B Procedure Service Order Process ☐ B2B Procedure Meter Data Process ☐ B2B Procedure One Way Notification Process ☐ B2B Procedure Technical Delivery Specification ☐ NEM RoLR Processes Part B ☐ B2B Guide ☐ Other, please specify:		
Areas impacted	(I.e. Section No.)		
Short description / title			
Other key contact information			

VERSION #	PRESENTED TO	DATE

ISSUE / CHANGE – DETAILED REPORT SECTION

1. Detailed Description of Issue / Change	
2. Market Impact	
3. Requirements / specific proposal	
4. Proposed solution/s	(Must address the B2B Procedures)
5. Law/Rule and clauses enabling change	(Must address head of power in governing law/rule)
5. Market benefits for industry as a whole	(Must address how change meets B2B Principles, National Electricity Objective, and/or National Energy Retail Objective requirements) B2B Principles: The following principles: (a) B2B Procedures should provide a uniform approach to B2B Communications in participating jurisdictions; (b) B2B Procedures should detail operational and procedural matters and technical requirements that result in efficient, effective and reliable B2B Communications; (c) B2B Procedures should avoid unreasonable discrimination between B2B Parties; and (d) B2B Procedures should protect the confidentiality of commercially sensitive information. NEO: the objective of this Law is to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to: (a) price, quality, safety, reliability, and security of supply of electricity; and (b) the reliability, safety and security of the national electricity system. NERO: The objective of this Law is to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy.

6. Customer benefits (consumers)	
6. Consequence/Impact of issue not proceeding	
7. Workaround/s (if necessary)	
8. Supporting documentation (attach if necessary)	
9. Any critical timelines to consider?	
10. IEC's preliminary assessment of the proposal	(This is to be left blank)

NEM ISSUE / CHANGE – RELEVANT ATTACHMENT(S)

ATTACHMENT A

Proposed changes: {*Procedure Name*}

~~Red strikeout~~ means delete and
blue underline means insert