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B2B Procedures Change Pack

Prepared by: Information Exchange Committee Version No: 1.00 Date: **14 August 2019**

Table of Contents

1.	NO	TICE OF CONSULTATION	2		
2.	BAG	CKGROUND	3		
3.	SCO	OPE / ISSUES STATEMENT	4		
4.	CO	NSULTATION DATE PLAN	5		
5.	IMP	PACT STATEMENT	6		
5	.1	B2B PRINCIPLES	6		
5	.2	B2B FACTORS	6		
5	.3	BENEFITS	7		
5	.4	DETRIMENTS	7		
6.	6. SUBMISSIONS				
6	.1	SENDING SUBMISSIONS	8		
7.	B2E	B PROPOSAL	9		

1. Notice of Consultation

This notice informs all Registered Participants and interested parties (Consulted Persons) that AEMO is conducting a consultation on B2B Procedures on behalf of the Information Exchange Committee (IEC). The changes in this consultation have been developed as a result of the IEC's consideration of clarification of existing procedures as well as of transactions raised but not implemented during consultations for the Power of Choice (PoC) reforms.

This consultation is being conducted in accordance with the Rules consultation requirements detailed in clause 8.9 of the NER.

The IEC invites written submissions on this Issues Paper. Submission instructions are provided in Section 6.

2. Background

This document has been prepared to detail proposed B2B Procedure amendments, which have been developed under the IEC's power to manage the ongoing development of B2B Procedures, as contemplated by National Electricity Rules (NER) clause 7.17.7(a)(2). The information provided meets the requirements for changing the B2B Procedures as detailed in Sections 7.17.4 and 8.9 of the National Electricity Rules.

This document also provides information considered by the IEC in determining if a prima facie case exists for amending the B2B Procedures, namely:

- An issues statement (see Section 3).
- A summary of changes to the B2B Procedures, including consideration of the B2B Principles (see Sections 3 and 5).
- An impact statement, including consideration of the B2B Objective (see Section 5).

The proposed changes have been considered and recommended by the IEC's Business-to-Business Working Group (B2B-WG).

The impacted Procedures are the:

- B2B Procedure: Customer and Site Details Notification Process v3.2.
- B2B Procedure: One Way Notification Process v3.2.
- B2B Procedure: Service Order Process v3.2.

3. Scope / Issues Statement

The IEC has developed the changes in this document in the interests of clarifying existing B2B Procedures. The changes being consulted on do not require any B2B e-Hub system changes. These changes were recommended to the IEC by the B2B-WG on behalf of industry.

The members of the B2B-WG are:

Retailers	Distributors	Metering
AGL	AusNet Services	IntelliHUB
EnergyAustralia	Energy Queensland	PlusES
Origin Energy	Endeavour Energy	Vector AMS
Red and Lumo Energy	SA Power Networks	
Simply Energy	TasNetworks	

This document lists the proposed changes to the B2B Procedures as developed, discussed and primarily agreed through consultation with the B2B-WG. The proposed changes under the B2B consultation have an effective date of 3 February 2020.

In summary, the proposed changes are:

- To amend the Miscellaneous Service Order definition in the Service Order Process to clarify that the Miscellaneous Service Order is only to be used when there is bilateral agreement between parties on its use.
- To amend the One Way Notification Process clauses concerning the Notices of Metering Works (NOMW) Removed Reading process to incorporate changes made to the B2B Guide in February 2019.
- To amend the definition of the allowed values for the "LifeSupportStatus" field of the Life Support Notification (LSN) transaction in the Customer and Site Details Notification Process to incorporate changes made to the B2B Guide in February 2019.

Detailed amendments are shown in the draft B2B Procedures published with this report.

4. Consultation Date Plan

The following table details the proposed consultation date plan:

Action	Start Date	End Date
IEC – Initial Meeting Agreement by the IEC that a case for change exists and that consultation should commence.	12 August 2019	
IEC to issue notice of consultation for publication by AEMO	14 August 2019	
Participant submissions to be provided to AEMO.	14 August 2019	19 September 2019
Submission receipt date	19 September 2019	
IEC to consider all valid submissions and prepare the Draft Determination report. This includes the change marked procedures.	19 September 2019	18 October 2019
AEMO to publish Draft Determination consultation (incl. change marked B2B Procedures)	18 October 2019	
Participant submissions to Draft Determination to be provided to AEMO.	18 October 2019	4 November 2019
Submission receipt date	4 November 2019	
IEC to consider all valid submissions and prepare the Final Determination report. This includes the change marked procedures	4 November 2019	17 December 2019
AEMO to publish B2B v3.3 Final Determination	17 December 2019	
B2B Procedure v3.3 effective date	3 February 2020	

5. Impact statement

The proposed changes directly impact the Customer and Site Details Notification Process, the One Way Notification Process, and the Service Order Process. This impact statement sets out an overview of the likely impacts, including benefits and costs, on AEMO and B2B Parties of the proposed amendments to the B2B Procedures.

5.1 B2B Principles

The IEC considers that the B2B Proposal supports each of the B2B Principles as follows:

B2B Principle	Justification
B2B Procedures should provide a uniform approach to B2B Communications in participating jurisdictions.	The proposed B2B Procedures do not introduce changes that would create any jurisdictional differences.
B2B Procedures should detail operational and procedural matters and technical requirements that result in efficient, effective and reliable B2B Communications.	The proposed B2B Procedures clarify the use of existing transactions to ensure that they are used efficiently, effectively, and reliably (in that they will be clearer and / or more easily automated, reducing costs and human error).
B2B Procedures should avoid unreasonable discrimination between B2B Parties.	The proposed B2B Procedures do not introduce changes that would discriminate between B2B Parties, as the proposed changes apply identically across all B2B Parties. Further, the proposed changes to the Miscellaneous Service Order clarify that the transaction can only be used with bilateral agreement, which will ensure that the transaction is unable to be used in a way that would permit unreasonable discrimination.
B2B Procedures should protect the confidentiality of commercially sensitive information.	The proposed B2B Procedures do not introduce changes that would compromise the confidentiality of commercially sensitive information.

5.2 B2B Factors

The IEC, on recommendation from the B2B-WG, has determined that the B2B Factors have been achieved for this B2B Proposal as described below.

B2B Factors	Justification
The reasonable costs of compliance by AEMO and B2B Parties with the B2B Procedures compared with the likely benefits from B2B Communications.	The proposed changes are intended to clarify existing B2B Procedures rather than impose new obligations, so there will be minimal costs of compliance. Additionally, increased clarity in the B2B Procedures will improve the ability for B2B parties to comply.
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.	The proposed B2B Procedures do not impose barriers to innovation or market entry; instead, they seeking to clarify existing B2B Procedures or formalise existing "best practice".
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.	There are no system changes required as a result of the proposed B2B Procedures, so no implementation timeframe is required from a B2B e-Hub. From a business process perspective, the proposed changes only clarify existing B2B Procedures or formalise existing "best practice", so minimal implementation timeframes should be necessary to make the required changes.

5.3 Benefits

The B2B Proposal clarifies existing obligations (enhancing regulatory transparency) or formalises existing "best practice" in the B2B Guide as an obligation under B2B Procedures. The IEC believes this will improve the efficient and effective use of existing B2B Communications.

5.4 Detriments

To the extent that B2B Parties have already established their business processes and IT systems to be compliant with existing B2B Procedures and "best practice", there will be minimal costs to implementing the above changes.

6. Submissions

The IEC invites written submissions on the proposed B2B Procedures v3.3.

Consulted parties are requested to identify any information in their submission that is considered to be confidential. The IEC require the consulted party to provide reasons as to why information is regarded as confidential.

6.1 Sending Submissions

Submissions are requested in electronic format using the 'Participant Response Pack Template' published on the AEMO website, as all submissions will be published on the AEMO website.

Submissions must be forwarded to the IEC, C/O AEMO by 5:00pm AEST on 19 September 2019.

Please email submissions, using the template, via email to: <u>NEM.Retailprocedureconsultations@aemo.com.au</u>

7. B2B Proposal

The proposed changes are detailed within the attached draft procedures published with this report.