INFORMATION EXCHANGE COMMITTEE

Election Procedures and Operating Manual Final Paper

1. PURPOSE

This paper outlines the changes proposed by the Information Exchange Committee (IEC) following its consultation on the IEC Election Procedures and Operating Manual for the reference of eligible voters including electricity retailers, metering coordinators, metering providers, metering data providers, distribution network service providers, and third-party B2B participants[1] (collectively, "B2B stakeholders").

2. BACKGROUND

At the February 2019 IEC meeting, the IEC requested that the Secretariat provide it with a list of proposed changes to the current IEC Election Procedures and Operating Manual to reflect the more mature Committee and meeting structure that had emerged following three years of the current IEC framework[2]. The IEC subsequently endorsed the changes to be consulted on with B2B stakeholders.

On 2 and 17 July 2019 respectively, the IEC Secretariat released a discussion paper and draft paper for all B2B stakeholders, describing the proposed changes to the IEC Election Procedures and Operating Manual (the consultation page can be found here). Since that time, the IEC Secretariat has been contacting B2B stakeholders to request feedback on the proposed changes.

3. DISCUSSION

Feedback was received from 31 participants[3]. Of these, 27 indicated that they were satisfied with the changes as proposed. Of the remainder:

- Tango Energy advised that additional stylistic edits should be made, and these were incorporated at the draft paper stage
- Red and Lumo Energy proposed several changes, for which the IEC's response was given in the draft paper
- AGL, similarly to Red and Lumo Energy, raised objections to lowering the requirement to issue papers 10 business days before a meeting to five business days before a meeting. The IEC as such proposes the following wording of that clause:

  "At least 10 business days where practicable and in any event at least five business days prior to a Meeting, the Secretary must provide the agenda and Meeting papers to the Members."

[1] There are currently no Third-Party B2B Participants.

[2] IEC, *18 February 2019 IEC Meeting Minutes*, 18 February 2019, p.5–6, link

[3] These participants were: ActewAGL Retail, AGL, Alinta Energy, Arc Energy Corporation, Aurora Energy, CS Energy, Delta Electricity, Diamond Energy, Elysian Energy, EnergyAustralia, Energy Locals, Enova Energy, Enwave Mascot, Ergon Energy Queensland, Flow Power, Mojo Power, Onsite Energy Solutions, ReAmped Energy, Red and Lumo Energy, ReNu Retail, Sanctuary Energy, Savant Energy, Sumo Power, Tango Energy, AusNet Services, CitiPower, Jemena, SA Power Networks, and TasNetworks.

- AGL raised two other points of feedback, which are addressed in Attachment A.
- Sumo Power raised four points of feedback, which are addressed in Attachment A.
- AusNet Services raised one point of feedback, which is addressed in Attachment A.

4. NEXT STEPS

The IEC is therefore now issuing the proposed IEC Election Procedures and Operating Manual for a vote by all B2B stakeholders. B2B stakeholders should submit a vote by emailing either “Support” or “Do not support” to iec@aemo.com.au. Voting will remain open until 25 October 2019 or until the vote passes as per 7.17.12(c) and 7.17.12(f) of the National Electricity Rules, whichever is earlier.

Once voting has closed, the IEC Secretariat will notify B2B stakeholders of the outcome and, if the changes are approved, publish the updated IEC Election Procedures and Operating Manual on the IEC web page.

ATTACHMENT 1: IEC RESPONSE TO FEEDBACK

Participant	Feedback	IEC response
AGL	The current requirement is to issue papers out for a meeting 10 b/days prior to the meeting this has been reduced to 5 b/days. We suggest that the period be retained as 10 b/days as far as possible, otherwise it will significantly reduce the ability of our IEC representative to circulate material and seek formal feedback (which may involve meetings/briefings) particularly from retailers who are not directly represented on the B2B Working Group.	The IEC has noted this comment and has amended the clause accordingly.
	We have no objection to minutes being issued in 10 b/days, however any urgent actions would need to be circulated immediately, rather than wait for the minutes. Again this is something more for the IEC members.	The IEC has noted this comment.
	We note the concern of other parties to the direct appointment of a discretionary member by AEMO. We would accept an appointment supported / agreed by the incumbent IEC members as it will be their effectiveness which will be impacted should the appointment be unsatisfactory to a segment of the market, which would follow appropriate notification to IEC members and participants.	NER clause 7.17.10(d) notes that "[p]rior to making such appointments, AEMO may consult with any person or persons determined by AEMO". As such, the IEC considers that the proposed IEC Election Procedures and Operating Manual fulfil NER requirements regarding consultation on discretionary member appointments.

Participant	Feedback	IEC response
AusNet Services	My business is supportive of the new Procedures and Operating Manual. I would note that when communicating with the industry using Market Notices there really needs to be a Notice Type: B2B PROCEDURE AND IEC GOVERNANCE ARRANGEMENTS. This will allow all participants to quickly pass on the information to the relevant people and for those people to subscribe to only those notifications without placing too high a reliance on the AEC and the ENA staff. Please include this as a discussion point at the meeting, after determining if AEMO can offer this B2B/IEC specific notice type.	The IEC will discuss this at its November 2019 meeting.
Sumo Power	Understanding that the definition is in the NER, for added clarity in the glossary, there should be a definition for B2B Parties and Voter Categories. Also, there appears to be an inconsistency in the name of the document, the front cover title is Election Procedures and Operating Manual and the glossary is Procedure and Operating Manual which is also what the document is referred to throughout.	Existing practice is to avoid duplicating definitions between the NER and Procedures; as such, given that these terms are NER-defined, and given that clause 2.1(b) refers readers to the NER, duplicate definitions will not be introduced. “Procedure and Operating Manual” is defined in section 1.1 to mean “Information Exchange Committee Election Procedure and Information Exchange Committee Operating Manual”.
	Adding the definition of Voter Category to the glossary will address the lack of definition in section 3. It seems odd to not have reference to half the membership and would improve the flow of the document.	Existing practice is to avoid duplicating definitions between the NER and Procedures; as such, given that these terms are NER-defined, and given that clause 2.1(b) refers readers to the NER, duplicate definitions will not be introduced.

Participant	Feedback	IEC response
	Section references in section 6.4 (b)(iii) and 6.4(b)(vii), need to be updated to reflect that it is section 6, no longer section 5. The reference in section 6.4(b)(vii) to Section 3 of this Procedure needs to be updated to Section 5.	The IEC has adopted the suggested changes into the track-changes procedures.
	Sumo is uncomfortable with the proposed change to reduce the timeframe for the provision of papers by AEMO to the IEC to 5 days prior to the meeting. In some instances where subject matter is complex, 5 days will not be long enough for voter category representatives to convene a meeting of interested parties to review material and arrive at a position to be presented to the IEC. This could be addressed in two ways: • Make no change and leave the timeframe at 10 days • Provide the IEC the flexibility AEMO is seeking and allow the IEC to request specific papers to be provided 10 days prior to the meeting.	The IEC has noted this comment and has amended the clause accordingly.