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Australian Energy Market Commission  
Level 6, 201 Elizabeth Street Sydney  
NSW 2000

Sent by email

**Re: National Electricity Amendment (Updating the electricity B2B framework) Rule 2016**

Dear Sir/Madam,

Ergon Energy Queensland Pty Ltd (EEQ) welcomes the opportunity to comment on the National Electricity Amendment (Updating the electricity B2B framework) Rule 2016 – Draft Rule Determination. Ergon Retail is a proud Queensland business that provides electricity to more than 700,000 homes and businesses.

This submission will focus on these main areas:

1. Timeframes between making of the Rule and delivery of ICT changes; and
2. IEC membership composition.

We understand that the time allowed for implementation of ICT changes as a result of the reforms would be in the order of 6-9 months. ICT systems that support B2B transactions represent a considerable investment by market participants that reflect that complexity of the industry more broadly. The proposed timeframes for system changes are not sufficient and will result in reduced B2B e-hub functionality at the commencement of competition in metering. Integrated systems that provide automation across the customer lifecycle benefit the customer and industry in delivering efficiencies as well improving the customer experience. We recommend that delivery dates for the project should be adjusted to reflect the practical limitations of achieving those dates whether that be by development of the B2B procedures by the interim IEC, considering minimum capability to be delivered for day 1, or some other approach.

There is a divergence of views amongst participants of a class and these views should be represented at the IEC level. A single DNSP and a single retailer nomination is not sufficient representation to encompass the broad industry views. As such we are supportive of both the ENA and the AEC who have recommended that there should be at least two DNSP and two retailer representatives on the IEC. As noted above, the ICT investment in the businesses is significant so it is imperative that the businesses that make these investments are heard.

If you have any questions regarding this submission please contact Gareth Morrah on (07) 3851 6823

Regards,

A handwritten signature in blue ink, appearing to be 'Ben Verdon', written over a circular scribble.

Ben Verdon  
A/ General Manager Wholesale Markets  
Ergon Energy Queensland