



**United Energy**  
6 Nexus Court  
Mulgrave VIC3170  
PO Box 449  
Mt Waverley VIC 3149  
T 03 8846 9900  
F 03 8846 9999  
[www.ue.com.au](http://www.ue.com.au)

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Ms Meredith Mayes  
AEMC Director  
Australian Energy Market Commission,  
PO Box A2449,  
Sydney South NSW 1235  
AEMC

Electronic lodgement – EMO0029

### **Draft Advice – Implementation advice on the Shared Market Protocol**

Dear Meredith

United Energy (UE) appreciates the opportunity to respond to the AEMC on the Draft Advice – Implementation advice on the Shared Market Protocol. UE looks forward to further participation in the debate on the governance framework for the SMP and the implementation arrangements and the development of transactions to facilitate new services.

UE has provided detailed responses to each of the areas for consultation in the Attachment, in summary:

- The AEMC proposes that the changes to B2B transactions necessary to operationalise the metering competition and embedded networks manager rules change be implemented through amending the current B2B procedures and redeveloping the B2B hub. UE supports this approach as it recognises the existence of the current B2B arrangements and the necessary amendments to cater for the new additional transactions associated with the primary services that are introduced through the meter competition rules change.
- UE also supports an amended Information Exchange Committee (IEC) to be responsible for developing and maintaining the B2B Procedures. Given the extensive workload, UE supports maintaining some continuity of the existing IEC members with a focus of ensuring the deliverables are met as efficiently as possible. UE is supportive of the IEC continuing as an industry committee being formed from the parties buying or using the transactional services ie those taking the price onselling/cost risk.

- UE does not support the limited representation on the IEC of 1 DNSP representative given that the DNSPs operate with different starting points and jurisdictional regulations. UE considers that at least 2 DNSP representatives are warranted to obtain a cross section of jurisdictions. Similarly 2 retailer representatives would afford both large and small retailers views and cover all jurisdictions. UE supports nomination of these representatives by the relevant market segment as opposed to possible appointment as discretionary members by AEMO.
- The election procedures and operating manual have rarely changed. UE understands that the IEC has reviewed these documents and would be in a position to update them in an efficient manner. The IEC should be tasked with updating its election procedures and operating manual and be provided sufficient budget to manage this task. The revised drafting of 7.2A.2 (a) should reflect the IEC being tasked with amending the procedures to accommodate the rule change.
- UE supports the continued use of an industry hub provided by AEMO and concur that there is an opportunity to upgrade the hub to more suitable new technology. The new B2B hub should allow both current transactions via FTP and new industry IT system to cater for near real time transactions.
- The proposed technical requirements of the B2B hub outlined in the paper appear reasonable. The B2B hub should also be able to provide the capability for the volume of transactions which may also arise from secondary or value add services or from the emergency priority procedure (if one way notifications were required).
- The AEMC, through the metering competition rules change, should clarify the role that provides the service eg the remote de-energisation and re-energisation or the NMI Inquiry, whilst the reasonable service requirements should rest with the IEC through the B2B Procedures. Any party can promote to provide an enhanced or more timely service subject to any regulatory limitation or contract negotiations.
- An agreed budget to deliver the metering competition and embedded network manager rule changes, amend the current B2B procedures and redevelop the B2B hub should be established to ensure that the IEC have the necessary funding for programme management costs and the ongoing costs for the next 5 years. This budget should also accommodate the further amendments to B2B procedures and the eHub that might be required for secondary or value add services and further Power of Choice amendments. Whilst AEMO will provide and operate the new B2B hub, the IEC should be free to manage their work programme, operating arrangements to meet agreed operational and strategic priorities within the budget constraint.
- The IEC work programme and funding needs to cover the following at a minimum:
  1. Programme management for the B2B changes to meet the POC initiatives;
  2. Draft and final (post industry socialisation) Gap Analysis of the Metering Competition , Embedded Network Manager rule changes and the performance requirements of the eHub subsequent to a further anticipated rule change arising from the AEMC Advice to the COAG EC that deals with the restructuring of the IEC and redevelopment of the eHub – issues and resolutions documented;
  3. Super Processes – At least level 2 processes;
  4. Swim Lane Processes – who does what deliverable / outcome - level 3 processes;
  5. Use Cases – People (Actor) / Systems / Process interplays; and
  6. RACI.

- The amended B2B Procedures for existing processes need to make it clear what role is doing what activity and who needs to be notified, this must be implemented by all parties for day 1 of metering competition to ensure that the roles in relation to meter transition, connection and supply are clear. Ideally the new B2B hub would be available at the commencement date of metering competition and allow improved timeliness of transactions, although the IT systems could be fairly readily configured across industry that this is not a show stopper.

UE also wishes to note our view that the representation of the 'Share Market Protocol' as being something new and something in and of itself is incorrect. The discussion that is encapsulated in what is contemporarily referred to as the Shared Market Protocol, in reality refers to three specific matters: the constituent representatives of the IEC as a decision making forum for B2B Procedures, the B2B Procedures themselves and the service standards associated with the Primary Services that are being mandated through the meter competition rules change. We believe that further discussion on these three matters would be more appropriately referenced by the specific matter that is under consideration rather than by reference to a possibly misleading concept of a 'Shared Market Protocol'.

Should you have any comments in relation to this response please do not hesitate to contact me on (03) 8846 9856.

Yours sincerely

Verity Watson  
**Manager Regulatory Strategy**

## Attachment

### Governance Arrangements

The AEMC proposes that the changes to B2B transactions necessary to operationalise the metering competition and embedded networks manager rules change be implemented through amending the current B2B procedures and redeveloping the B2B hub. UE supports this approach as it recognises the existence of the current B2B arrangements and the necessary amendments to cater for the new additional transactions associated with the primary services that are introduced through the meter competition rules change.

UE also supports an amended Information Exchange Committee (IEC) to be responsible for developing and maintaining the B2B Procedures. Given the extensive workload, UE supports maintaining some continuity of the existing IEC members with a focus of ensuring the deliverables are met as efficiently as possible. UE is supportive of the IEC continuing as an industry committee being formed from the parties buying or using the transactional services ie those taking the price onselling/cost risk.

The AEMC suggests that industry led decision making is likely to produce better stronger incentives to make responsible and efficient decisions than those on AEMO. UE supports this view.

The Draft Advice notes that the current B2B Procedures aim for efficient transactions thus minimising the costs for DNSPs and retailers which is beneficial for consumers, as lower costs are passed through to charges faced by retailers. Even with metering competition, some of these services may be provided by a metering services provider, but the data is still required as metering data, metering configuration etc to ensure accurate network billing. The main new transaction related to the minimum metering services not already in the list of current B2B transactions is the meter installation enquiry transaction.

B2B has evolved and catered for Victorian AMI eg one way notifications, changes to include service providers rather than just retailer and distributor so that roles are clear and to extend the one way transactions to clarify the need to transition from a regulated meter to a competitively provided meter need to be progressed by the IEC in a clear and robust workplan.

A B2B hub upgrade and the move to more rapid services is not a compelling reason to amend the B2B governance, it is a reason for AEMO and industry to ensure that there is a sound business case to meet an agreed scope and ensure that there is clear communication to all interested parties and that all interested parties can commit to the development of new requirements.

Current B2B	New Services
Customer and Site Details Notifications	
Service Order	
New connection	
De-energisation and re-energisation, field and remote	Pri'y- remote re-en and de-en, Sec'y remote re-en arming
Meter reconfiguration – field and remote	Pri'y– meter reconfig Sec'y- load limit, load mgt
Special read – field and remote	Pri'y -meter read on demand

Adds/alts – field and remote Meter investigation Supply abolishment	Sec'y – local access to metering system via a registered device
Meter data	Pri'y – meter read scheduled
	Pri'y – meter install inquiry
One way notification	
Technical and delivery guideline	
Build pack	
	Value add enable HAN, supply failure and restoration notifications, metering installation asset mgt, safety monitoring

UE understands that the Draft Advice and the need for amendment to the membership of the IEC is predicated on the 'new interests' in the market from metering providers – MC, MP and MDP and consumers. The proposal as we understand it is that the IEC would develop the B2B procedures to accommodate the minimum meter services specification, which are largely the transactions already available in the B2B procedures ie the primary services. The need for the secondary or the value added services should be based on whether there are parties wishing to sell the services and parties wishing to buy the services at volume. The service sellers are the metering service providers who sell network data or network services, demand response services or load control services, other meter data services. The buyers of the services may be broadened beyond the DNSPs and retailers to include third party energy services providers and ultimately consumers. UE considers that any changes to the IEC to reflect new interests should be made on an incremental basis to the existing IEC.

The Draft Advice notes that the new gatekeeper role which was originally the Metering Coordinator may be assigned between the Metering Coordinator, metering provider and the metering data provider. These service providers have a contract with a party to provide services on a certain basis. For cost effective transactions for mass market customers, there will be a requirement for standardised transactions and compliance with these transactions on the eventual service provider party(s) nominated. These are the transactions in the market today – customer and site details, meter data, service orders, network billing and credit and collections/disputes. To ensure that transactions are updated in a timely manner, the AEMC should provide clarity of which role is providing what service in the Metering Competition rule change, for example physical de-energisation LNSP and remote de-energisation MDP etc. This will provide clear direction to the IEC for the necessary changes in the existing B2B Procedures and may provide some direction for the possible role responsibilities for the secondary and value add services.

The IEC needs to ensure the development of new transactions and the inclusion of the broader representation at working groups, the circulation of meaningful meeting packs to all interested stakeholders, open and transparent decision making at the IEC meetings by allowing interested observers to attend are just as important as a representative committee.

The Draft Advice suggests that the limitation of 1 representative from each group of registered/accredited participants reduces the likelihood of voting blocks. The Paper suggests that each member will bring their unique market experience to engage in balanced consideration of issues within the decision making framework. However despite this, the Paper also poses two discretionary members to improve the cross jurisdictional representation and the range of retailer input. UE suggests that the relevant market segment have a second DNSP representative from a different jurisdiction and there is also a second retailer representative from a non incumbent retailer or new entrant/second tier retailer.

UE does not support the limited representation on the IEC of 1 DNSP representative given that the DNSPs operate with different starting points and jurisdictional regulations. UE considers that at least 2 DNSP representatives are warranted to obtain a cross section of jurisdictions. Similarly 2 retailer representatives would afford both large and small retailers views and cover all jurisdictions. UE supports nomination of these representatives by the relevant market segment as opposed to possible appointment as discretionary members by AEMO.

UE supports third party energy service provider representation and consumer representation. The Paper selects Energy Consumers Australia (ECA) as a national energy consumer advocacy body on national market matters. UE suggests that ECA be able to nominate the consumer representative which may come from ECA or from any of the consumer organisations that participate in the consumer roundtables discussions.

UE does not support AEMO appointing the discretionary members in consultation with the independent representatives. If this approach were to proceed, the independent representatives on the IEC should endorse the approach and the proposed representatives. The discretionary members should not come from the vendors of component elements that are used in the delivery of services (ie meter suppliers, communications suppliers, IT/outsourcing suppliers) but rather from new parties who are operating new services that are transacted through the eHub. New parties with new innovative services are not precluded from proposing changes to B2B or proposing new B2B procedures and should still be able to be an observer at meetings. Particular expertise or new ideas and new parties should not be precluded from any stage in the development, consultation and transparent decision making.

In making a decision which better meets the NEO the IEC could not progress decision which adversely impacted AEMO. It is hoped that AEMO would be actively engaged and highlight broad views on development and opportunities for synergies in both the development of B2B changes, input into the B2B workplan and into the formal consultations regardless of whether they were a member of the IEC or not.

Where a parent company and related parties hold multiple categories of registration and accreditation, they should only be able to nominate for one position on the IEC and can only have one all of company representative on the IEC. One company cannot have multiple members on the IEC.

UE's proposed membership is shown below.

Members	IEC	Updated IEC - AEMC	Proposed IEC - UE
DNSP	3 DNSP representatives nominated by that market segment	1 DNSP representatives nominated and elected by that market segment	2 DNSP representatives nominated and elected by that market segment
Retailer	3 retailer representatives nominated by that market segment	1 retailer representative nominated and elected by that market segment who has a retailer authorization in a NECF adopting jurisdiction or who is registered with AEMO as a customer who engages in selling in non NECF jurisdictions	2 retailer representatives nominated and elected by that market segment who are registered with AEMO as a customer who engages in selling
MC/MP/MDP		1 metering coordinator/meter provider/meter data provider representative	1 metering coordinator/meter provider/meter data provider representative
3 <sup>rd</sup> party		1 third party B2B participant	1 third party B2B participant
Consumer		1 consumer representative appointed by AEMO in consultation with Energy Consumers Australia	1 consumer representative nominated by Energy Consumers Australia
Discretionary members		2 discretionary members appointed by AEMO in consultation with the independent IEC members	None
2 independent members	2 independent members - Nominated by retailers or DNSPs and elected by those parties	2 independent members -Nominated by all parties and elected by all parties who are registered or accredited – this appears to leave out the consumer member.	2 independent members - Nominated by all parties and elected by all parties who are registered or accredited, independent of all registered and accredited parties and AEMO

AEMO representative		1 AEMO representative nominated by AEMO CEO	1 AEMO representative nominated by AEMO CEO
Membership	8	10	10
Quorum	At least 5, at least 2 DNSP, 2 retail and 1 independent	At least 6, 1 independent must be present	At least 6, 1 independent must be present

### IEC procedures and operating manual

The Draft Advice suggests that AEMO be tasked with updating the IEC election procedures and the operating manual. UE suggests that the current IEC be tasked with updating the IEC election procedure and operating manual in light of the fact that the IEC is continuing, albeit in a changed form.. The costs incurred to make this update through the IEC governance arrangements would be borne by AEMO and recovered through the B2B Participant Fees.

The election procedures and operating manual have rarely changed. UE understands that the IEC has reviewed these documents and would be in a position to update them in an efficient manner.

UE supports a new quorum for the proposed IEC of at least 6, 1 of which must be an independent.

The Draft paper proposes the following decision making criteria.

	Decision making
New B2B Procedure Change to existing B2B procedure Approval of an IEC work program	Requires the support of 7 or more members
Any other decisions	Requires the support of 6 or more members
AEMO limited veto powers	Where NEO or B2B principles have not been considered  Where there is an inconsistency with MSATS  Rules consultation procedure not followed

UE supports the proportional approach adopted in the Paper.

## **Making and Amending Procedures**

UE is supportive of the upgrading/amending of the current B2B Procedures and the incremental procedures needed for the minimum metering services. The drafting in the NER, 7.2A.4 (b), that B2B Procedures must include content, process, information to be provided to support and communications etc does not need updating to include the minimum services specification. The minimum services specification may require new transactions to be developed and included in the suite of the B2B Procedures, the IEC should be tasked with ensuring that any new transactions to accommodate the minimum services specification are included. The generic nature of the rule of what a B2B procedure must contain is still valid.

The B2B Procedures should include the performance requirements of the B2B hub.

The B2B Principles should be amended in the following manner:

- UE recommend that the B2B principles to be considered actually have regard to the likely benefits outweighing the full costs to all parties, including AEMO of implementing the changes. The benefits vs cost of compliance principle should include AEMO costs of implementing and implications and the last principle proposed should be removed. UE suggest amending principle 5 to this effect.
- The impacts on innovation and barriers should compare to costs incurred by the B2B participants in using the B2B Procedures. A participant can agree to use the B2B hub or just to adopt the standardised transaction and send the B2B transaction outside of the hub. The B2B participant accreditation, credit support and fees may be a barrier to small third party energy services providers. The B2B Procedures for advanced transactions should help lower the barriers to uptake, we believe the drafting in principle 6 should refer to the B2B Procedures and not the B2B hub.

Before the IEC consults on any new B2B procedures, AEMO should have already advised on any issues with the B2B hub in relation to the change and whether this would increase the costs. There should not need to be a positive obligation on the IEC to consult with AEMO, AEMO are well integrated into the B2B change process, will be a member of the IEC and should be proactive in raising any issues from a market/hub operator point of view, including where they perceive the costs of the proposed change outweighs the benefit.

UE supports the IEC having to provide documentation on the rationale for the change and the chosen option compared to others and to respond on how matters raised in submissions have been dealt with.

## **IT Platform**

UE supports the continued use of an industry hub provided by AEMO and concur that there is an opportunity to upgrade the hub to more suitable new technology. The new B2B hub should allow both current transactions via FTP and new industry IT system to cater for near real time transactions. . A task that the IEC should undertake with regards to the eHub is whether there is an argument to transition away from the current FTP transaction delivery mode over a set period following the commencement of the new eHub on the basis of greater efficiency.

UE supports the concept of the use of the shared IT platform for high volume of transactions and a standardised communication approach for B2B Procedures. The new B2B Procedures must cover all the current B2B Procedures updated to reflect the new role accountabilities and must cover each of the

services set out in the minimum services specification. The B2B Procedures will also specify the B2B hub performance requirements.

The proposed technical requirements of the B2B hub outlined in the paper appear reasonable. The B2B hub should also be able to provide the capability for the volume of transactions which may also arise from secondary or value add services or from the emergency priority procedure (if one way notifications were required).

The proposed rules state that AEMO may develop a minimum services specification procedure which covers for each of the meter services specified in the minimum services specification, the minimum services service levels, service availability, completion rates, completion timeframes etc (clause 7.8.3(c)). AEMO at its discretion can place this information in any of the AEMO procedures. The service levels for meter data provision are already outlined in the meter data provider service level procedure. To the extent that there are on demand reads, provide or verify meter data, meter reconfiguration requests etc, these are already dealt with in the B2B Procedures and we query why an additional procedure is required as opposed to amending the B2B Procedures to reflect the transactional responsibilities that should be defined in the rules change and any further transaction delivery performance requirements that might be required for a national smart meter (eg type 4b).

Generally service levels for services relating to energisation have been the domain of the regulator and the B2B transactions just provides a method of communication. Regulators have set the service standards for customer facing services and UE believes are best placed to provide this customer protection for energy supply compared to a market operator.

The only new transaction in the minimum services is the NMI enquiry transaction, the IEC could make decisions on the necessary service levels for this transactions in the formation of the B2B process and represent this in an amendment to the B2B Procedures.

The AEMC, on advice from AEMO, has specifically taken a services view for the new framework. The minimum services specification procedure which covers service availability, service timeframes, completion rates etc is now going to the communication and the IT infrastructure and performance capability for each transaction. If the AEMC agrees that industry is best placed to make the cost effective decisions, then other than the meter data needed for the market to operate, UE believes that these decisions should be left to the IEC as part of the B2B Procedures. Furthermore, UE believes that the AEMC, through the metering competition rules change, should clarify the role that provides the service eg the remote de-energisation and re-energisation or the NMI Inquiry, whilst the reasonable service requirements should rest with the IEC through the B2B Procedures. Any party can promote to provide an enhanced or more timely service subject to any regulatory limitation or contract negotiations.

As noted in the paper by the AEMC, AEMO need to provide technical advice on the likely cost impacts of implementing various proposals and levels of technical performance. The cost to participants of the intermediate option and cost vs performance times would be useful to determine parties willingness to pay.

### **Obligations on parties**

UE is supportive of the retailer, LNSP, MC, MP and MDP and B2B Participants (third party energy services providers) being required to use the B2B hub for communications for the existing B2B Procedures (as amended) and the new B2B Procedures for the minimum services (eg for NMI Install Enquiry). UE is also supportive of these parties needing to comply with the existing B2B Procedures (as

amended) and the new B2B Procedures for the minimum services unless there is agreement by the relevant parties to an alternative method of communication. B2B transactions to date have enabled mass market communications between retailers and the LNSP in various market roles.

It is important that the rules appropriately clarify the nature and scope of the services and which role is responsible for delivery. The IEC must be tasked with ensuring that efficient processes and swim lane processes, RACI etc are undertaken to ensure that the most efficient processes are adopted across industry. There are significant costs on a number of parties associated with meter churn and increased number of roles and role complexity adds costs to all services across the industry.

There needs to be a method of access to the B2B hub through a registration process. The hub registration processes allows a participant ID to be allocated to third parties where required without the more onerous nature of accreditation requirements. If a third party energy services provider is unable to transact successfully with a service provider party for data/services then there is a commercial imperative for them to make sure they test adequately.

Making this an accreditation process should not result in onerous accreditation requirements, extensive form filling and audit costs etc. The paper suggests that even credit support could be required of a B2B Participant. The B2B hub is part of the AEMO IT system capability that has enabled mass market transactions and facilitated retail competition. The cost of both implementing and ongoing transactional costs have not been funded by distributors or metering service providers before. AEMO has previously taken the position that these costs are best placed on one party who is closest to the customer and able to pass them on. If AEMO seek to spread the costs over a number of participants as proposed, each B2B participant will need to price in the risk of unknown B2B Participant costs along the services chain which may result in a worse outcome for consumers.

Whilst the adoption of the fee and cost allocation principles is not unreasonable on one level:

- The extent of costs and the possible allocation is unknown;
- The LNSP and the regulated metering business prices will already have been established for a 5 year period by the AER before this rule and AEMO budget/cost sharing becomes transparent;
- This creates uncertainty for competitive meter providers pricing and contracting arrangements and also third party energy service providers and potentially adds to the uncertainty that may lead to increased bypass.

UE supports the continued recovery of B2B costs via participant fees recovered from retailers. It is not clear that the more advanced services will be part of the B2B Procedures ie the secondary or value add and whether they will be utilised in great volumes to warrant separate charging.

### **Implementation and transitional arrangements**

An agreed budget to deliver the metering competition and embedded network manager rule changes, amend the current B2B procedures and redevelop the B2B hub should be established to ensure that the IEC have the necessary funding for programme management costs and the ongoing costs for the next 5 years. This budget should also accommodate the further amendments to B2B procedures and the eHub that might be required for secondary or value add services and further Power of Choice amendments. Whilst AEMO will provide and operate the new B2B hub, the IEC should be free to manage their work programme, operating arrangements to meet agreed operational and strategic priorities within the budget constraint.

The IEC work programme and funding needs to cover the following at a minimum:

7. Programme management for the B2B changes to meet the POC initiatives;
8. Draft and final (post industry socialisation) Gap Analysis of the Metering Competition , Embedded Network Manager rule changes and the performance requirements of the eHub subsequent to a further anticipated rule change arising from the AEMC Advice to the COAG EC that deals with the restructuring of the IEC and redevelopment of the eHub – issues and resolutions documented;
9. Super Processes – At least level 2 processes;
10. Swim Lane Processes – who does what deliverable / outcome - level 3 processes;
11. Use Cases – People (Actor) / Systems / Process interplays; and
12. RACI.

The IEC needs to have available an agreed budget for this work to ensure that the process, time, cost, quality etc are met. The IEC needs to have discretion on how this funding is used to make sure that they meet the NER obligations and can accommodate the efficient transactions required for day 1, AEMO needs to make available the funds. The B2B work programme, including implementation of the new hub needs to be developed with the necessary budgets available to the IEC for delivery of the work program and AEMO for implementation of the new hub.

UE is supportive of the upgrading of the B2B hub IT platform and would seek to better understand the full project costs for the work which AEMO and ultimately customers would need to fund. There needs to be transparency of the cost/time tradeoff in the central hub and the delivery of improved services which ultimately benefits consumers.

The IEC should be tasked with updating its election procedures and operating manual and be provided sufficient budget to manage this task. The revised drafting of 7.2A.2 (a) should reflect the IEC being tasked with amending the procedures to accommodate the rule change.

The IEC secretariat should be tasked with running the necessary elections, establishing the nominated lists of the interested stakeholders (extended to cater for customer nominated representative lists, third party B2B participants, the MC/MP/MDPs, and other interested parties eg regulators, safety regulators, governments, Ombudsman etc). It is important to ensure transparency and openness of decision making during the transitional phase, the IEC secretariat should ensure that all papers and presentations are provided 5 business days prior to the meeting and made available to all parties on the full set of nominated lists and comprehensive minutes are also available to all nominated parties in a timely manner.

It is important that the transitional arrangements provide a clear right to extend and make transparent the IEC papers and decision processes during the interim period. UE is supportive of a transitional arrangement that enables the current IEC to start all of the work before the amended IEC and rule comes into effect.

Transitional rules could be made to ensure that the current IEC has updated the operating manual and election procedures by a certain date, called for nominations and elections and formed the new IEC by a certain date. If the final rule change that deals with the changes to the membership of the IEC and, if required, changes to B2B Procedures arising from metering competition and embedded networks manager, was available in April 2016 and these tasks could be completed with 4 months and 6 months respectively then the reformed IEC should be able to make the Final Determination on the new/amended B2B Procedures for the Metering Competition and ENM rule changes. Any work undertaken by the current IEC in establishing the B2B work programme and budget, developing the B2B changes and rules

consultation will need to be taken into account as work undertaken by the new IEC to ensure timely delivery for industry implementation.

UE is supportive of the IEC amending the election procedures and the operating manual. Any changes to the documents should be clearly tracked, a clear reason for the change and papers should be provided to all parties on the nominated list and consulted on by the IEC. The changes should be largely mechanical once the format of the IEC is decided and whether a rules consultation process is needed should be at the discretion of the IEC. Informal or selective consultation is not supported.

UE is supportive of the IEC limiting the first set of B2B procedures to upgrading/amending the current B2B Procedures and the incremental procedures needed for the minimum metering services. The IEC should make a clear decision whether the current B2B Procedures (as amended) provide sufficient services for the continuation of load control or hot water and slab heating. The IEC should be able to develop papers and call to the nominated list the timing of any further transactional requirements eg DB to FRMP notification of meter fault replacement and non compliant meter needing replacement in a new B2B one way notification (OWN) transaction.

Either the metering competition rule or the anticipated rule dealing with the membership of the IEC and B2B Procedure changes and performance requirements needs to include the Metering Co-ordinator (MC) in the list of parties who must use the B2B hub and comply with the B2B Procedures. The efficient processes for a meter exchange process and new connections etc need to be developed and the responsibilities allocated. This must be included in the IEC work programme to ensure we have a cost effective transition of the metering arrangements. It is not yet clear whether the MC will need to receive B2B transactions from day 1 of metering competition. For example as meters need to be exchanged the DB could provide an OWN to a retailer for exchange of the meter at a certain NMI, the retailer could send to their preferred MC for programming the change within their business, the selection of parties and customer notification requirements etc could then follow in CATS. The amended B2B Procedures should reflect the transactional responsibilities that are defined in the rules change and any further transaction delivery performance requirements that might be required for a national smart meter (eg type 4b), this must be implemented by all parties for day 1 of metering competition to ensure that the roles in relation to meter transition, connection and supply are clear. Ideally the new B2B hub would be available at the commencement date of metering competition and allow improved timeliness of transactions, although the IT systems could be fairly readily configured across industry that this is not a show stopper.