
11 December 2014

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted electronically

Dear Sir/Madam,

Re: Enabling metering technology reforms: Consultation on implementation timetable

This letter is in response to the Australian Energy Market Commission's (Commission's) Consultation Paper on the proposed implementation timetable for the 'Expanding Competition in Metering and Related Services' (Metering Competition) rule change and associated advice and rule changes.

The Information Exchange Committee (IEC) welcomes the opportunity to respond to the Consultation Paper with a view of the expected timing for implementation of the Rules, Procedures, and the systems and process changes that result from the Power of Choice review.

An initial industry view

The IEC, AEMO and interested stakeholders have worked together to inform an industry view of the required changes for Power of Choice as a whole, including the Metering Competition rule change. This industry view was discussed at an IEC-facilitated workshop on 10 November 2014, where the IEC and AEMO invited the Commission, the Australian Energy Regulator, the Commonwealth and other interested stakeholders to attend a session discussing the overarching Power of Choice and its impacts on the retail market procedures, systems and processes.

Following the workshop, an industry sub-group convened to develop a draft implementation plan based on the workshop outcomes and industry experience of past implementation and releases of a similar nature.

Whilst this draft implementation plan has not been formally considered or endorsed by the IEC, AEMO or the industry broadly, the IEC believes that it provides a helpful starting point for discussions on the broader Power of Choice implementation issues and timetable. The plan is provided as an initial draft on an "as is" basis to assist the Commission with its objective of designing a workable implementation timetable. The IEC expects that individual Committee Members may also make submissions to the Commission with their specific comments or additional insights.

Recommendations

The IEC makes 3 recommendations for the Commission's consideration:

1. The IEC recommends that the Commission consider this draft implementation plan in its development of the rule changes and the overall Power of Choice program. We encourage the Commission to discuss the draft implementation plan further with the

industry sub group, as this will facilitate an understanding of the key assumptions underpinning the plan and the stress points in the plan. The IEC is happy to arrange such a meeting with the Commission and any other interested stakeholders.

2. The IEC recommends that the Commission re-consider the implementation timing during its Draft Determination consultation. As the rule drafting becomes available, the change required can be reassessed and reflected in an updated draft of the implementation timeline.
3. A coordinated approach to implementation that is managed by a dedicated, independent program management team be established in early 2015. The contribution of many stakeholders is required for the overall program to succeed, and independent program management is seen by participants as essential to ensuring the program is comprehensive, integrated, efficient and realistic. Early establishment of a project management framework will provide the best basis for managing the critical process development and procedure drafting effort.

Detailed draft implementation plan

The IEC provides the supporting detailed draft implementation plan (in Gantt Chart format) as an overall industry perspective. In completing the plan, the sub group relied on the following items:

- Rule change consultation processes have been based on information provided by the AEMC.
- Procedure consultation timings have been based on the consultation timing in the National Electricity Rules and previous experience of working on multiple rule changes and releases of this nature.
- Estimates on timing related to the COAG Energy Council's amendments to the National Energy Retail Rules relating to Smart Meter Consumer Protection.
- Assumptions and dependencies that reflect an efficient approach to implementation, based on previous experience with significant reform programs.

Whilst the draft implementation plan will require further revision as more information is made available, including agreement by stakeholders on key assumptions, the plan sets out some of the fundamental interdependencies, sequencing and timeframes to facilitate greater understanding of what is required to implement the Power of Choice program.

Most importantly, the draft implementation plan groups rule changes into an efficient release schedule where rule changes with similar impacts on procedures, processes and systems have been grouped together. This is to ensure that the Power of Choice program is implemented efficiently and meets the long term interests of consumers.

Attached to this submission is the detailed draft implementation plan and the list of key considerations, outlining risks, recommendations and notes regarding the work plan to facilitate a better understanding of how the plan has been developed and the areas for potential improvement.

Key Observations

The implementation planning exercise has demonstrated that the detail is complex and the impacts widespread, with all Retail Market Procedures impacted. Key issues affecting the overall timeline include the efficient bundling of the work packages, balancing parallel development against the need for certainty in development, implementation timelines and risk management.

These points are outlined as follows:

1. Bundling of related Rules changes.

Metering Contestability, the Shared Market Protocol, NECF2 and Embedded Networks all affect the same Procedures, are related and/or have similar timing requirements. The draft implementation plan recommends creating a single release for these work packages for efficiency.

Rule changes associated with Multiple Trading Relationships and Demand Response Management (should the Commission decide to make these rules) are separated into a distinct, subsequent release to manage complexity and timeframes.

Customer Access to Data is proposed to continue on the current timeframe as a stand-alone release.

2. Sequencing and Certainty.

The draft implementation plan makes important assumptions in relation to controls for development. Parallel development is adopted where practicable, within the following constraints that are required for certainty and to avoid re-work risks:

- While Procedure development analysis may commence based on Rules Draft Determinations, finalisation of Procedures and formal Procedures consultation may not proceed until Rules Final Determinations are released;
- Procedures must be developed to a carefully managed program, so that outcomes are integrated and consistent across all Procedures. Any requirement to re-work a Procedure after Final Determination for that Procedure will cause delays; and
- Participant systems development is dependent on the preparation of "Build Packs". Build Packs are a long established, critical step in the industry development process that defines clearly the requirements for interfacing with market systems. Build packs require completion of the Procedures and definition of the database schema. They are not available until the Final Determination of the Procedures is available. Commencing participant IT development without Build Packs has been demonstrated to result in inefficient outcomes.

3. Participant Delivery Timelines.

The draft implementation plan indicates that participant IT systems for the metering reforms release can be expected to take more than 12 months for design, build and internal testing, industry-wide integrity testing and go-live readiness confirmation and implementation.

4. Key Risks

There are a number of risks to implementation efficiency and timing, including:


- Potential for the national ring-fencing guidelines to impose obligations that require change to Procedures;
- Details of the reforms are not yet fully defined - effort and timing will be dependent upon these details and the associated complexity;
- Delays to Rules Final Determinations will impact timing across the program, while substantive changes between Draft and Final Determinations may require re-work; and
- Different bundling of Rules changes, or timing around Rules changes, may result in a requirement for parallel development processes, increasing development complexity and risk.

The draft implementation plan assumes these risks are successfully managed.

Conclusion

The IEC encourages the Commission to consider the draft implementation plan and work with AEMO and the industry to develop it further so that there is a common understanding of what is required to implement the Power of Choice, and how to best implement the Power of Choice work packages.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Peter Carruthers".

Peter Carruthers
Chair
Information Exchange Committee
Att.

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
Rules establishment considerations			
1.	<p>The scope of the Gantt is focused on Power of Choice.</p> <p>In the draft implementation plan specific account has not been taken of other large industry projects such as EDPRs, NECF implementations and gas B2B arrangements for NSW/ACT, as the plan is refined, the implementation risks to POC and/or these projects will need to be considered.</p>	<p>Tasks or task sequences are focused on POC to develop a practical, realistic project plan.</p>	NA
2.	<p>Some of the Power of Choice (POC) initiatives are largely standalone i.e. somewhat independent of other initiatives, and are progressing to broad timeframes which achieve implementation before the other broader and larger POC changes:</p> <p>i) Customer access to data – implementation 1 March 2016</p> <p>ii) Demand Side Participation Information to AEMO – implementation potentially mid 2016</p> <p>iii) Customer Switching Review</p> <p>Subject to the outcome from the COAG Energy Council and a cost benefit, the customer switching rule or procedure changes may be able to be part of a small MSATS release following Release 1 – metering competition, or if a major change to addressing standards and the transfers process would be a candidate for Release 2.</p>	<p>The POC initiatives:</p> <ul style="list-style-type: none"> • Customer access to data and • Demand Side Participation Information to AEMO <p>are included as standalone programs.</p>	NA
3.	<p>The AEMC's POC full range of initiatives contains too many separate Rule changes, and resultant process and procedure and system changes to be combined into a single Rules change package and implementation release. Attempting a single release would:</p> <ul style="list-style-type: none"> • Potentially delay metering competition; • Make the Rules (NER and NERR) changes difficult to integrate into a whole; • Make it difficult for industry to provide rigorous comment; and • Result in a very large and risky 	<p>The Gantt is based on having two releases.</p> <p>Release 1 consists of Rule changes and implementation for metering contestability (including SMP basis in the Rules), NECF 2¹ and embedded networks into the contestability rule change as Release 1.</p> <p>These initiatives appear to be a logical package:</p> <ul style="list-style-type: none"> • they are a manageable package as NECF 2 and embedded network are not going to add a major additional increment of system change 	NA

¹ NECF 2 – SA Minister made smart meter customer protections in NECF. EMRWG is developing a consultation paper for a further round of consultation on these amendments to the NERR.

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	<p>process and IT system change. Conversely, undertaking each Rule and Procedure change independently would be unnecessarily disruptive and result in inefficient rework with material costs.</p>	<ul style="list-style-type: none"> • embedded networks are a current issue • NECF 2 sets the customer protection framework for the smart meter services developed in the metering contestability initiative such as Supply Capacity Control. <p>Release 2 consists of Multiple Trading Relationships (MTR) and Demand Response Mechanism (DRM) Rule changes and related process and system changes, should these changes progress. These initiatives are less well defined and justified, are relatively large with respect to system change, and are not an integrated and “essential” component of the contestable meter framework.</p>	
4.	<p>Although AEMC has recognised the complexity of the Rule change and the need to provide a clear and practical basis for Procedure and system changes, the AEMC’s proposed implementation timeline does not incorporate enough time for the industry review and feedback necessary to deliver quality Rules drafting for the Metering Contestability Final Determination.</p> <p>The Procedure development and drafting process, and the final alignment of industry and AEMO outcomes with the Rules as drafted, will be dependent on, the Rules drafting providing a clear and practical framework. Chapter 7 is unlike many other Chapters of the Rules in that it is not just setting high level frameworks, but rather is at a level of detail much closer to the industry working arrangements.</p>	<p>Gantt includes four months for consultation and recognises two components of the process:</p> <ul style="list-style-type: none"> • A formal consultation response period; and • A period of consideration of the detail of the drafting and the achievement of workable outcomes. The expectation is that through this period workshops/consultation on details of the drafting will be held by AEMC. 	52, 53, 54.
5.	<p>The various Rules changes which “initiate” the Procedure changes and implementation (design/build/test) that constitute a Release must all have the same <i>commence operations</i> date².</p> <p>Further only a Rules change process would be able to change the <i>commence operations</i> date of a Rule once the Rules change is in place.</p>	<p>The Release 1 time schedule has a single implementation time schedule with a single Effective Date and the <i>commence operations</i> date of the four related Rules changes must align with this Effective Date.</p> <p>Similarly for Release 2.</p>	54, 61, 68, 72, 74

² The Rules *commence operations* date is the Effective Date of the associated Procedure changes and is the date at which the industry implementation program goes live to meet the Rules requirements.

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	<p>The metering competition rule needs to be finalised first, as this is the most complex rule change and highest risk of delay. ENM and NECF2 could be made shortly after, and then the SMP governance.</p>		
6.	<p>The individual rule changes which together constitute a Release, must have co-ordinated Final Determination dates which ultimately provide the basis of a single consolidated Rules Change. Unless carefully co-ordinated it is possible that the individual Rules changes may be inconsistent or unclear and cause stakeholder confusion. These individual Final Determinations could be on the same date or could be staggered to aid the co-ordination process.</p> <p>Achieving co-ordination with the AEMC drafted changes in NERR for contestability and those in the NERR being driven by the COAG for NECF2 has special challenges.</p>	<p>Gantt considers the Meter Contestability Rules changes to be the major and hence “lead” Rule change. This Rules Final Determination will set the major outcomes of Release 1 and set the major drafting changes in the Rules. Gantt has a Task Dependency for Embedded Network Rule change Final Determination, from the Meter Contestability Rules changes Final Determination.</p> <p>And sequentially the NECF2 NERR Rules change “Final Determination” from the ERMWG for COAG has a Task Dependency from the Embedded Network Rule change Final Determination.</p> <p>It should be noted that the Gantt recognises and includes two other Tasks which follow the NECF2 NERR Rules change Final Determination. Endorsement of the ERMWG NERR Rules change “Final Determination” by COAG and then the making of the NERR change through the SA Parliament. There is some risk to completing the Release 1 Rule changes if there are any issues which delay these last two tasks.</p>	72-74
7.	<p>A consolidated version of the ‘to be implemented’ Rules (NER and NERR) would be beneficial for industry and AEMO before the finalisation of the package of Procedure changes to ensure consistency. This ensures that the Procedure package aligns correctly with the consolidated Rules changes</p>	<p>Gantt has Task Dependencies for the various Procedure Changes from the last of the Release 1 Rules Final Determination (NECF2).</p>	75, various
8.	<p>It is very desirable for the Embedded Network Initial Draft to be issued concurrently with or later than the Contestability Rule Draft Determination. This will enable the Embedded Network rules to be slotted into the revised Chapter 7 as opposed to being inserted into the old Chapter 7.</p>	<p>Gantt has a Task Dependency supporting this desirable sequence of tasks.</p>	51 and 64, 54 and 68

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
9.	AEMC has stated that their advice to COAG re the SMP Governance rules, that the change will be submitted coincident with the Final Determination on the Meter Contestability Rules changes, and further that given the background discussions to be undertaken, will be done under the fast track Rules change process.	Gantt is drafted on this basis. However, the scope and content of this Rules change is somewhat unclear, and there are some concerns that there will be insufficient debate regarding what could be a reasonably significant impact on industry arrangements and change processes.	57-61
10.	Whilst the AEMO Advice to COAG regarding the Functionality Specification provides some understanding of the AEMO view of the Service Specification there are a number of the aspects of the services framework which will not be clear until further information is available from AEMO with respect to the Shared Market Protocol advice to COAG. Once some further detail re the service regime is available it is assumed that industry debate re the services model will inform the AEMC Rules drafting. Industry considers that this debate is important and should be recognised in the Time Schedule.	Gantt includes Task for this debate.	79
11.	The criteria for the commencement of the Rule changes for Release 2 (MTR, DRM, and Transfer Review outcomes) should have no overlap with the Release 1 Rule changes (should the Commission decide to include MTR and DRM into the Rules). The rule changes from release 1 need to be finalised in order to have a solid basis for the development and drafting of the rules for release 2.	Gantt with respect to Release 2 is on this basis with a dependency on handling of Release 2 Rules changes from the Release 1 Rules changes.	182→
Procedure considerations			
13.	It is important that before industry SMEs commence work with AEMO on the Procedures and SMP that a period is allowed following the release of the Contestability Rule changes Draft Determination for understanding of the Rule change and its implications to be developed and considered within industry businesses. This should not inhibit the implementation of the governance of the overall program of work and the reporting and information forums commencing.	Gantt assumes two months from Contestability Rule changes Draft Determination before work on the Procedures and SMP commences.	Various
14.	Based on discussion at the IEC/AEMC workshop and some statements in the	Gantt has a Task Dependency for the Service Level Procedure Draft	83 linked to

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	<p>AEMO Functionality/Services Advice to COAG there are three levels of definition of the smart meter services.</p> <ul style="list-style-type: none"> The Rules will have a relatively high level description of the services mandated from a new and replacement smart meter. This detail will be sufficient to ensure that the policy expectation of the new and replacement based rollout is “protected” in the Rules. A Minimum FS / Service Level Procedure which will add the additional detail to expand the definition of the services and hence provide the basis of the detailed process development. A SMP Procedure which defines, as does the existing B2B Procedures, the processes and necessary transactions to provide the operational support for the delivery of the services defined in i) and ii) above. <p>The finalisation of the Minimum FS / Service Level Procedure is dependent on the level of definition included in the Rules. The Draft Determination for the Minimum FS / Service Level Procedure cannot be confidently completed until the Final Determination on the Rules is in place.</p>	<p>Determination from the Meter Contestability Rules changes Final Determination.</p>	54
15.	<p>The Release 1 Rules changes (meter contestability, embedded networks, NECF 2) have impacts on many of the Retail Market Procedures and the B2B Procedures. Hence there are various Task Dependencies between the Rules changes and the Procedure changes. However not all rules change impact on all the Procedures and these Dependencies are somewhat complicated. E.g. the Churn Procedure has a dependency on the Meter Contestability Final Determination but the Procedure has no dependency on the other two Release 1 Rules changes. Some advantage can be made of this to stagger some of the Procedure changes to reduce the impact on the finite number of industry SMEs capable of inputting to these changes</p>	<p>Gantt includes an attempt to recognise these various dependencies, and to stagger the Procedure developments.</p> <p>However opportunities for this to occur without impacting on the critical path are limited. Hence there will remain risks that the Procedure development process may be compromised by lack of industry SMEs, and result in changes and delays during the design/build phase.</p>	Various
16.	<p>A number of the Procedure changes have complex dependencies on multiple Rule final determinations and</p>	<p>Instead of allowing the normal 20 days for the draft determination Gantt includes the maximum permitted 45</p>	Various

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
	interdependency on other Procedures. Draft Determinations will be complicated and involve potential need for workshops on details	days for Draft Determination to allow time to hold adequate meetings.	
17.	The SMP Procedure Final Determination cannot be made until the SMP Governance Rule is in place. The Final Determination must be made by the party nominated in the SMP Governance Rule and with the intent and content etc. as defined in the SMP Procedure.	Gantt has a Task Dependency for the SMP Procedure Final Determination from the SMP Governance rule Final Determination.	164 has link from 61
18.	<p>The ring fencing requirements are currently very uncertain and could result in resource and system changes being imposed on Distributors.</p> <p>The ring-fencing Guideline must be in place as a prerequisite for commencing Distributor system design, build and test to ensure that necessary changes are part of the build.</p> <p>Adding ringfencing requirements which need a level of system change, after the Release 1 build scope is otherwise finalised will add additional cost and potentially impact build timelines.</p>	Gantt has dependency on the implementation time schedule from the AER Guideline determination.	169 linked to 172
System Release Impact Considerations			
19.	<p>Despite the fact AEMO commence work on Build Packages based on market designs and Procedure draft determination, the industry can only prudently commence IT system development based on a finalised Build Package that is based on Procedure final determinations.</p> <p>Further although drafting of the Build Pack can (and often does) commence at Draft Determination stage, finalisation of the Build Pack cannot occur for such a large change until after the Final Determination on the Procedures is in place.</p>	Gantt has a dependency such that the industry implementation time schedule does not commence until the Build Package is in place.	172 is linked to 165
20.	Without a quality design, build, test and release structure with coordinated industry controls, industry end-to-end systems will likely have capability issues resulting in industry and customer impacts such as billing issues, failure of SMP service requests, non-SMP MSATS transactions failing and Stop	Gantt design, build, test and release tasks are drafted on this basis.	172-174

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
	<p>Files in market systems. Even with a “die on the vine”³ style of implementation major industry all registered participants will need functional systems.</p> <p>The required industry time frame for the implementation is:</p> <ul style="list-style-type: none"> • Twelve months is required for industry to conduct a quality design, build and internal test. This includes the finalisation of contracts with businesses application support contractors, and the manning up of large sale projects. • Three months to conduct co-ordinated industry testing before the expected release date. • One month to finalise reporting against the success criteria and to reach an agreed Go Decision. <p>These timeframes have some contingency for adverse outcomes in the predecessor tasks and within the implementation tasks. Some potential aspects that could impact the implementation date include:</p> <ul style="list-style-type: none"> • For such a large change there is risk that once design commences further build pack drafting changes (or further procedure changes) will be required with potential impacts on the design/build time frame. • Some critical Participants fail aspects of the industry testing and must carry out remedial works before completing testing • Where potentially Participants will be utilising external entities for service provision the failure of implementation for one service provider could impact a number of Participants <p>Whilst some contingency is allowed this is minimal and two or more issues could put the final implementation date at risk.</p>		
21.	<p>A key requirement of go live because of the significant changes to service provider service levels and the potential for multiple new parties entering the market as Metering Coordinators (MCs) and/or service providers, is to have accreditation processes in place for</p>	<p>Gantt includes the development of accreditation processes and documentation and the actual accreditation process.</p>	177-179

³ “Die on the vine” – ie add smart meters only to a new system with POC capabilities, and leave old system to support ultimately a diminishing number of old meters.

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
	<p>these MCs and service providers.</p> <p>The accreditation process for Service Providers involves a series of gates at different stages of the AEMO accreditation audit. The final step is the successful involvement in the industry test program.</p>		
22.	<p>Implementation program for Release 2 should not commence until all Procedure changes and build packs are in place (as per the basis of Release 1 implementation start dependencies). However it is also very desirable to allow some months between the completion of Release 1 implementation and the start of Release 2 implementation.</p> <p>This will allow time for the consolidation of Release 1 and the complete operationalization of the Release 1 outcomes.</p> <p>The basis of the Release 2 program has not been subject to the same level of consideration as the more critical Release 1.</p> <p>Any overlap between Release 2 program must be carefully considered.</p> <p>Tight sequencing of the two releases may allow the project resources to roll from delivery of release 1 to delivery of release 2 which has the potential to avoid a further project ramp up phase and may be cost effective if well managed.</p> <p>However a situation where industry and AEMO would still be developing the procedure changes and implementing release 1, whilst trying to develop the rules and procedures for release 2, would add SME resource issues and additional complexity and confusion.</p>	Gantt relationship between Release 1 and Release 2 is cognisant of this position.	

This Gantt should be read in conjunction with the appropriate MS Word Notes.

ID	Task Name	Duration	Predecessor	Successor	Scheduled Start	Scheduled Finish	2015												2016				2017				2018				2019		
							2015			2016			2017			2018			2019														
							Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3						
1	Key Milestones	1114 days			Fri 27/02/15	Thu 6/06/19																											
2	Market Release MDPP and DSP	309 days			Fri 27/02/15	Thu 5/05/16																											
3	MDPP Draft Determination	0 days 29			Tue 23/06/15	Tue 23/06/15																											
4	MDPP Final Determination	0 days 31			Tue 1/09/15	Tue 1/09/15																											
5	MDPP Go Live	0 days 33			Tue 1/03/16	Tue 1/03/16																											
6	DR Draft Determination	0 days 37			Fri 27/02/15	Fri 27/02/15																											
7	DR Final Determination	0 days 38			Tue 14/04/15	Tue 14/04/15																											
8	DR Information Procedure Draft Determination	0 days 42			Wed 9/09/15	Wed 9/09/15																											
9	DR Information Procedure Final Determination	0 days 44			Mon 30/11/15	Mon 30/11/15																											
10	DR Go Live	0 days 47			Thu 5/05/16	Thu 5/05/16																											
11	Market Release - Meter Competition, Shared Market Protocol, Embedded Network Manager and NECF2	432 days			Thu 31/03/16	Mon 27/11/17																											
12	Rule Changes Determined	0 days 49			Thu 31/03/16	Thu 31/03/16																											
13	Procedures Determined	0 days 76			Thu 4/08/16	Thu 4/08/16																											
14	Industry Design, Build and Test Complete	0 days 175			Mon 27/11/17	Mon 27/11/17																											
15	Service Provider Accreditation Complete	0 days 180			Mon 2/10/17	Mon 2/10/17																											
16	Go Live	0 days 181			Mon 27/11/17	Mon 27/11/17																											
17	Ring Fencing Guidelines Determined	0 days 166			Fri 23/12/16	Fri 23/12/16																											
18	Market release - Multiple Trading Relationships and Demand Side Management	660 days			Thu 24/11/16	Thu 6/06/19																											
19	Rule Changes Determined	0 days 183			Thu 24/11/16	Thu 24/11/16																											
20	Procedures Determined	0 days 211			Fri 15/09/17	Fri 15/09/17																											
21	Industry Design, Build and Test Complete	0 days 233			Thu 6/06/19	Thu 6/06/19																											
22	Service Provider Accreditation Complete	0 days 238			Thu 9/05/19	Thu 9/05/19																											
23	Go Live	0 days 243			Thu 6/06/19	Thu 6/06/19																											
24	CUSTOMER METER DATA PROVISION	370 days			Wed 1/10/14	Tue 1/03/16																											
25	Meter Data Provision Procedure (MDPP) establishment	240 days			Wed 1/10/14	Tue 1/09/15																											
26	Customer data final rules changes - Final Determination	26 days	27		Wed 1/10/14	Wed 5/11/14																											
27	AEMO MDPP - Initial Draft	40 days 26	28		Mon 2/02/15	Fri 27/03/15																											
28	AEMO MDPP - Consultation	42 days 27	29		Mon 30/03/15	Tue 26/05/15																											
29	AEMO MDPP - Draft Determination	20 days 28	30,3		Wed 27/05/15	Tue 23/06/15																											
30	AEMO MDPP - Consultation	30 days 29	31		Wed 24/06/15	Tue 4/08/15																											
31	AEMO MDPP - Final Determination	20 days 30	33,4		Wed 5/08/15	Tue 1/09/15																											
32	Industry Design, Build and Test	130 days			Wed 2/09/15	Tue 1/03/16																											
33	Build/Test	130 days 31	5		Wed 2/09/15	Tue 1/03/16																											
34	AEMO COLLECTION OF DEMAND SIDE PARTICIPATION INFO	417 days			Wed 1/10/14	Thu 5/05/16																											
35	AEMC DR Info draft rule change	140 days			Wed 1/10/14	Tue 14/04/15																											
36	AEMC DR Info draft rule change - Draft Determination	65 days	37		Wed 1/10/14	Tue 30/12/14																											
37	DR Info draft rule change - consult	43 days 36	38,6		Wed 31/12/14	Fri 27/02/15																											
38	DR Info final rule change - Final Determination	32 days 37	40,7		Mon 2/03/15	Tue 14/04/15																											
39	AEMO DR Info Procedure	178 days			Wed 15/04/15	Fri 18/12/15																											
40	AEMO DR Info Procedure - Initial Draft	53 days 38	41		Wed 15/04/15	Fri 26/06/15																											
41	AEMO DR Info Proc- consultation	33 days 40	42		Mon 29/06/15	Wed 12/08/15																											
42	AEMO DR Info Proc - Draft Determination	20 days 41	43,45,8		Thu 13/08/15	Wed 9/09/15																											
43	AEMO DR Info Proc- consultation	28 days 42	44		Thu 10/09/15	Mon 19/10/15																											
44	AEMO DR Info Proc - Final Determination	30 days 43	9		Tue 20/10/15	Mon 30/11/15																											
45	AEMO develop/finalise build pack	72 days 42	47		Thu 10/09/15	Fri 18/12/15																											
46	Build / Test	99 days			Mon 21/12/15	Thu 5/05/16																											

This Gantt should be read in conjunction with the appropriate MS Word Notes.

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							Qtr 3		Qtr 4		Qtr 1		Qtr 2		Qtr 3		Qtr 4		Qtr 1		Qtr 2		Qtr 3		Qtr 4		Qtr 1		Qtr 2		Qtr 3		Qtr 4
185	COAG MTR decision on 1 or 3 models	20 days	186		Fri 27/11/15	Thu 24/12/15																											
186	AEMO MTR Rule Change Request	60 days	185	187	Fri 25/12/15	Thu 17/03/16																											
187	AEMC MTR rule change - consultation paper	72 days	186	188	Fri 18/03/16	Mon 27/06/16																											
188	AEMC MTR rule change - consultation	33 days	187	189	Tue 28/06/16	Thu 11/08/16																											
189	AEMC MTR rule change - Draft Determination	20 days	188	190,213	Fri 12/08/16	Thu 8/09/16																											
190	AEMC MTR rule change - consultation	35 days	189	191	Fri 9/09/16	Thu 27/10/16																											
191	AEMC MTR rule change - Final Determination	20 days	190	215	Fri 28/10/16	Thu 24/11/16																											
192	Third Parties in the Market	220 days			Fri 27/11/15	Thu 29/09/16																											
193	Third party Issues paper - develop/create	20 days		194	Fri 27/11/15	Thu 24/12/15																											
194	COAG endorse release issues paper	20 days	193	195	Fri 25/12/15	Thu 21/01/16																											
195	Third party Issues paper - consult	20 days	194	196	Fri 22/01/16	Thu 18/02/16																											
196	Third party Policy paper - develop/create	20 days	195	197	Fri 19/02/16	Thu 17/03/16																											
197	Third party Policy paper - consult	20 days	196	198	Fri 18/03/16	Thu 14/04/16																											
198	COAG endorse policy and request rule change	20 days	197	199	Fri 15/04/16	Thu 12/05/16																											
199	NER/NERR rule change - develop	20 days	198	200	Fri 13/05/16	Thu 9/06/16																											
200	NER/NERR rule change - consultation	20 days	199	201	Fri 10/06/16	Thu 7/07/16																											
201	NER/NERR draft rule change - develop	20 days	200	220,202	Fri 8/07/16	Thu 4/08/16																											
202	NER/NERR draft rule change - consult	20 days	201	203	Fri 5/08/16	Thu 1/09/16																											
203	NER/NERR final rule change - develop	20 days	202	222	Fri 2/09/16	Thu 29/09/16																											
204	Demand Response Mechanism	165 days			Fri 27/11/15	Thu 14/07/16																											
205	COAG review CBA and decide to progress?	65 days		206	Fri 27/11/15	Thu 25/02/16																											
206	DRA rule change - develop	20 days	205	207	Fri 26/02/16	Thu 24/03/16																											
207	DRA rule change - consultation	20 days	206	208	Fri 25/03/16	Thu 21/04/16																											
208	DRA draft rule change - develop	20 days	207	227,209	Fri 22/04/16	Thu 19/05/16																											
209	DRA draft rule change - consult	20 days	208	210	Fri 20/05/16	Thu 16/06/16																											
210	DRA final rule change - develop	20 days	209	229	Fri 17/06/16	Thu 14/07/16																											
211	Procedure Development	120 days	76	20	Mon 3/04/17	Fri 15/09/17																											
212	Multiple Trading Arrangements	120 days			Mon 3/04/17	Fri 15/09/17																											
213	AEMO CATS, NMI, NMP, SLP Procedure - develop/create	20 days	189	214	Mon 3/04/17	Fri 28/04/17																											
214	AEMO CATS, NMI, NMP, SLP Procedure - round 1 consult	20 days	213	215	Mon 1/05/17	Fri 26/05/17																											
215	AEMO CATS, NMI, NMP, SLP Procedure - develop draft det	20 days	191,214	216,235,2	Mon 29/05/17	Fri 23/06/17																											
216	AEMO CATS, NMI, NMP, SLP Procedure - consult draft det	20 days	215	217	Mon 26/06/17	Fri 21/07/17																											
217	AEMO CATS, NMI, NMP, SLP Procedure - develop final det	20 days	216	218	Mon 24/07/17	Fri 18/08/17																											
218	AEMO develop/finalise build pack	20 days	217	234	Mon 21/08/17	Fri 15/09/17																											
219	Third Parties in the Market	120 days			Mon 3/04/17	Fri 15/09/17																											
220	AEMO CATS/B2B Procedure change - develop/create	20 days	201	221	Mon 3/04/17	Fri 28/04/17																											
221	AEMO CATS/B2B Procedure change - round 1 consult	20 days	220	222	Mon 1/05/17	Fri 26/05/17																											
222	AEMO CATS/B2B Procedure change - develop draft det	20 days	203,221	223,235,2	Mon 29/05/17	Fri 23/06/17																											
223	AEMO CATS/B2B Procedure change - consult draft det	20 days	222	224	Mon 26/06/17	Fri 21/07/17																											
224	AEMO CATS/B2B Procedure change - develop final det	20 days	223	225	Mon 24/07/17	Fri 18/08/17																											
225	AEMO develop/finalise build pack	20 days	224	234	Mon 21/08/17	Fri 15/09/17																											
226	Demand Reponse Mechanism	120 days			Mon 3/04/17	Fri 15/09/17																											
227	AEMO CATS/B2B Procedure change - develop/create	20 days	208	228	Mon 3/04/17	Fri 28/04/17																											
228	AEMO CATS/B2B Procedure change - round 1 consult	20 days	227	229	Mon 1/05/17	Fri 26/05/17																											

