

# Attachment - AEMC consultation paper: Updating the electricity B2B framework



Red and Lumo Proposal	COAG Energy Council proposal	UE Proposal
Titled: Retail Industry Panel	Titled: IEC	Titled: IEC
AEMO representative (acting as chairperson)	AEMO representative (acting as chairperson)	1 independent member acting as chairperson
2 retailer representatives	1 retailer member	2 retailer representatives
2 DNSP representatives	1 DNSP member	2 DNSP representatives
2 metering representatives	1 metering member	1 metering representatives
Up to 4 discretionary representatives (which may include up to one consumer, up to one independent, up to two third party B2B participants, and/or any other B2B party considered necessary for the representation of the retail industry)	Up to 1 third party B2B participant member	Up to 1 third party B2B participant member
	2 independent members	1 extra independent member Both independents nominated by all B2B parties and elected by all B2B parties, independent of all registered and accredited parties and AEMO
	1 consumer member	1 consumer member nominated by ECA
	Up to 2 discretionary members	1 AEMO representative nominated by AEMO CEO
<b>Total: 7 - 11 members</b>	<b>Total: 7- 10 members</b>	<b>Total: 9 -10 members</b>
<b>Quorum</b> Less than 8 members – 5 9 or more members - 7 Must include AEMO	<b>Quorum</b> Less than 9 members – 5 9 or more members- 6 Must include AEMO	<b>Quorum</b> Less than 9 members – 6 9 or more members- 7 Must include 1 independent (Chair), 1 DNSP and 1 retailer
Super Majority – 70% rounded up to nearest whole number IEC recommendations to make or amend B2B procedures Amend discretionary representatives Approve IEC work programme	Super Majority – 70% rounded up to nearest whole number IEC recommendations to make or amend B2B procedures Approve IEC work programme  Ordinary majority – 60% rounded up to nearest whole number Other decisions	Super Majority – 70% rounded up to nearest whole number IEC recommendations to make or amend B2B procedures Amend discretionary representatives Approve IEC work programme

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Ordinary majority – 60% rounded up to nearest whole number Other decisions		Ordinary majority – 60% rounded up to nearest whole number Other decisions
Disputes AEMO makes B2B Decision IEC recommendation	Disputes AEMO makes B2B Decision	Disputes AEMO makes B2B Decision

Table of AEMC Questions and UE response

Question Number:	AEMC question	UE response
Box 5.1 Proposed B2B arrangements		
1	Given the changes to the NER from the competition in metering and embedded networks final rules and the new services that can be offered using advanced meters, is there a need to update the current B2B framework?	<p>United Energy believes that the changes to the NER from the competition in metering and embedded networks final rules and the new services that can be offered using advanced meters create a need for changes to the current B2B framework that recognizes and efficiently caters for the following:</p> <ul style="list-style-type: none"> <li>• The new roles that will perform activities associated with some B2B processes and benefit from being informed about other B2B processes – MC, ENM, EEN</li> <li>• The operation of B2B processes for all meter types and customer groups – type 4 and 4a advanced meters on small customers, type 4 advanced meters on large customers, Vic AMI meters and competitively provided type 5 and 6 meters.</li> <li>• The parties that will be able to submit a B2B Change Proposal needs to be expanded</li> <li>• Inclusive B2B Procedure governance arrangements</li> </ul>

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		<ul style="list-style-type: none"> <li>• Meter churn, including transition of a regulated meter to a competitively provided meter.</li> </ul> <p>The current B2B services, for example connection, supply upgrades, metering reconfiguration to support solar, customer energisation and de-energisation, meter data and billing, payments and disputes, and management of customer and site details including life support, need to be transitioned to the new competitive metering and competitive embedded network manager environment in a well co-ordinated transition. The current B2B services need to cater for the new roles and the various meter types for mass market, high volume transactions so that efficiencies are not reduced.</p> <p>The initial focus of this work should also include establishing B2B processes that support the operation of the minimum services that smart meters are required to be able to deliver and the operation of the Embedded Network processes; that is the work required to fully enable the desired policy outcomes.</p> <p>Subsequently, based on demand, the new advanced metering services can be added.</p> <p>UE believes that the efficiency of the current B2B services must be maintained and that changes cannot be allowed to compromise safety. Updated current B2B services and new B2B arrangements must support jurisdictional requirements such as safety etc.</p> <p>UE is concerned that work on the changes to the B2B framework may be hampered by the current B2B definitions which only refer to transactions between retailers and DNSPs. These definitions appear to limit AEMO's ability to provide resources to work on B2B processes that cover a broader participant group, some of which will not exist until new rules are made, and the IEC's ability to make decisions about such B2B processes.</p> <p>UE is encouraged by the participants' desire to progress work on the B2B processes necessary to enable the policy outcomes from the metering competition and embedded networks rules changes and will continue to work with all parties to progress these matters as quickly as possible.</p> <p>UE encourages the AEMC in making its determination on this rules change to consider mechanisms that will allow rapid adoption of an election process for the newly constituted IEC rather than spending time on the definition of an interim arrangement to be in place until the members of the newly constituted IEC are appointed. UE suggests that the current IEC should remain the governance authority for B2B Procedures and associated documentation until the newly constituted IEC is appointed via the election process. UE believes that this approach will encourage a rapid transition to the newly constituted IEC as well as encourage collaboration on the development of B2B processes required to</p>

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		<p>deliver the scope suggested above – work that industry can commence ahead of the final framework.</p>
2	<p>What are the most appropriate arrangements for IEC/Retail Industry Panel membership, including the arrangements for election/appointment of members and requisite qualifications of members?</p>	<p>UE supports the Red/Lumo proposal that retailers and distributors have 2 representatives each on the newly constituted IEC. Retailers and distributors are involved in the vast majority of current B2B processes from both a scope and volume perspective. This is unlikely to change for some time given the initial focus on enabling the minimum services. UE considers that these members should be appointed to the IEC via an election process conducted by the IEC Secretariat in which retailers registered in the NEM get to vote on the retailer candidates and DNSPs registered in the NEM get to vote on the DNSP candidates. Qualifications of these members, and other member categories, should be suggested but the IEC Secretariat should not be required to vet any of the nominations prior to the election process.</p> <p>UE consider that there is less need for 2 metering representatives, and suggests that 1 representative is sufficient. Retailers are the only party who can select an MC and hence metering parties are largely an extension of the retailers paid service providers in the competitive market. Where MC's offer new services beyond those catered for in the current B2B arrangements then distributors or some other party may be seeking to procure the services, new third party energy services providers. It is likely that the MC who sells services will have the corresponding transaction party voting the same way. The distributors representatives will also be MCs, MPs and MDPs and there is a fair chance that the at least one of the retailer representatives will be also.</p> <p>UE considers that these members should be appointed to the IEC via an election process conducted by the IEC Secretariat in which businesses registered in the NEM as Metering Coordinators, Meter Providers and Meter Data Providers get to nominate and vote on the candidates. Consistent with the above, IEC Secretariat should not be required to vet nominations prior to the election process.</p> <p>UE supports the appointment of a Consumer representative to the newly constituted IEC with this member being appointed by the Energy Consumers Association.</p> <p>UE supports the appointment of a Third Party B2B Participant to the newly constituted IEC with this member being nominated and elected by parties who are registered as a B2B participants other than a retailer, distributor, metering coordinator, meter provider or meter data provider. Consistent with the above, IEC Secretariat should not be required to vet nominations prior to the election process.</p> <p>UE supports AEMO being a member of the newly constituted IEC. UE considers that this member should be the senior executive (i.e. direct report to the CEO) with responsibility</p>

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		<p>for the operation of the retail electricity market. This position is currently the Executive General Manager Markets.</p> <p>Both drafting proposals suggest that the AEMO member must be a Director of AEMO. The drafting in 7.17.10 (c) should be amended to recognize CEO appointed member and alternate that are AEMO senior executives.</p> <p>UE consider that it is important to maintain two independent representatives on the IEC, to allow continuity of independence from all vested parties. The Chair role for the new IEC must be an independent person, the second independent can fill in when the Chair is not available and also provide for continuity as the role terms expire.</p> <p>UE considers that retailers, distributors, metering businesses and third party B2B participants, the B2B parties, should be able to nominate candidates for the independent member positions and should be entitled to vote on these appointments. Qualifications for these positions should be defined but the IEC Secretariat should not vet nominations. The qualifications for these positions should cover independence, senior governance experience, executive and board networks, and facilitation skills. UE does not consider technical understanding to be a material selection criteria for these positions.</p> <p>If the AEMC adopts drafting that incorporates a number of discretionary roles, UE support the drafting by Red/Lumo that the expansion of the IEC Committee decision is subject to the super majority of the IEC. (Red/Lumo drafting of 7.17.6 (b) (2)). This enables the Committee to formally expand or to ensure open meetings and decision making is in place which could also alleviate a need to expand IEC.</p> <p>UE support the Red/Lumo proposal that any third party service provider is eligible to nominate/vote or hold an IEC positions if they are a B2B accredited/registered party and not already in a category of distributor, retailer etc. UE support the COAG drafting for the third party B2B participant representative - if there is at least one person accredited in that market segment then the segment is open as eligible for the committee and the one or more new third party B2B participants can nominate or vote to have an IEC member. (COAG drafting 7.17.6 (b) (1)(vii))</p> <p>The (current) IEC should be confirmed as the IEC until the newly constituted IEC is appointed through the election processes discussed above. The IEC should be tasked with developing the new election and operating manual and ensuring that the newly constituted committee, with the broader representation, is appointed as early as possible, but no later than 1 September 2016. UE suggests that a 75% majority should be required from all voting blocks in order for a change to the election and operating manual to be adopted.</p>

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		<p>The secretariat of the IEC should maintain a list of all member businesses in each of the IEC member categories and a list of the single contact points for those businesses so that the election nomination forms and voting forms and other consultation matters have a key contact point and can be readily utilised. This is different from the drafting that AEMO needs to maintain a list of IEC Committee members, as a representative committee we would hope that AEMO in a secretariat role would be open and transparent and make available the representative members (by member category) for any interested B2B party to be able to discuss issues with.</p> <p>UE is concerned that establishing a requirement for a quorum whereby non-attendance of a single member can mean that the meeting cannot proceed will inhibit the effectiveness of the forum. The drafting of no quorum unless the AEMO member is present in 7.19.9 (b) should be removed. To avoid this situation UE recommends that each IEC member, other than the Independent members, should be required to have a recognised alternate member appointed, under the same process as the primary member and that the primary member be obliged to attend the meetings or arrange for the alternate to attend the meeting. As meetings can be conducted using technology there should be very limited circumstances that any member or their alternate cannot attend. Accordingly, UE recommends that a quorum should be a minimum of six members (or alternates) including one independent (Chair), one DNSP representative and one retailer representative.</p> <p>The drafting by COAG in 7.17.10 (f) – (i) is preferred to the equivalent Lumo/Red drafting. It is more appropriate that the market segment voters must nominate parties and elect parties rather than the segment (or a few in the segment) getting together and appointing the representative (without an election?).</p> <p>The Red/Lumo drafting of 7.17.10 (f) where the IEC makes decisions about the expansion of the IEC to include further discretionary should be adopted in preference to the COAG drafting where AEMO must consult with the Independent members and any other parties and then make a decision to expand the committee.</p> <p>COAG have proposed that AEMO ensure the suitability of the Discretionary and Consumer representatives in terms of industry/B2B knowledge. In contrast Lumo/Red have proposed that AEMO ensure the suitability of the Independent member and Consumer member. UE consider that the parties who nominate and vote for the Independent members are capable of making the assessment of the candidates. The COAG drafting should be progressed without including the Independent nominations in AEMO's assessment, this aligns AEMOs appointment role with the assessing suitability role which is more appropriate.</p>

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		<p>UE consider that the updating of the operating manual and election procedures should be undertaken by the current IEC. The initial update of these documents is more than a refresh and should form part of a public rules consultation process.</p> <p>Further updates of these documents undertaken by the IEC should be based on at least 75% support from each of the distributors, retailers and metering members if there are three voting categories, if there are 4 voting categories then the voting to make changes should include at least 75% support from each of the four categories. Amendments to 7.17.12 (c) and (f) should reflect the 75% or more support from each of the voting categories. This better reflects the nomination/election processes for certain representation categories vs the appointed roles.</p>
3	<p>What are the appropriate arrangements for the making of B2B procedures, including the decision-making process, decision-making criteria and the split of roles between AEMO and the IEC/Retail Industry Panel?</p>	<p>The current B2B Procedures and any decisions made on amendments or new procedures to support metering competition and meter exchanges clearly have a significant impact on distributors and retailers and the completeness, timeliness and accuracy of network billing and retail billing. UE support the parties that are most impacted by the decisions and the efficiency of the information exchange being parties involved in the decision making process.</p> <p>AEMO are expected to be a member of the new IEC and will have roles as secretariat and working group leads etc and will be highly involved in the process. If AEMO consider that the proposed change will not meet the NEO then this should be provided to the IEC early in the process either at the time that the consistency with MSATS is advised or AEMO must respond accordingly in the rules consultation process. The drafting in COAG 7.17.5 (b) that allows AEMO to have participated in the process all the way through and then after an IEC B2B Recommendation set aside the decision would be disappointing and result in inefficient use of industry resources and should be avoided. Further it is not clear whether AEMO could after considering the B2B recommendation and the NEO, alter or amend the decision. UE consider that all IEC Committee members and industry responses need to consider the NEO as do the working groups during the development phase. AEMO should not have a veto power on IEC B2B Recommendations, issues relating to the NEO need to be highlighted by AEMO during the development and consultation processes for the IEC to consider. The drafting proposed by COAG about AEMO considering the NEO after all industry development and the public consultation and responses, and the IEC decision making processes to advise the B2B Recommendation should be removed.</p> <p>AEMO must make the B2B decision unless the IEC has failed to have regard for the B2B factors or given consideration to the B2B Principles or has not followed the Rules</p>

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		<p>consultation. The original AEMC proposed drafting where AEMO cannot consider the merits after the B2B recommendation by the IEC must be re-instated.</p> <p>UE do not support the extension of the AEMO consideration of conflict with the Market Settlement and Transfer Solution procedures being extended to the Retail Market Procedures in the Red/Lumo proposal.</p> <p>The definition of Retail Market Procedures is not in the Victorian version of the NER as yet. Despite this Retail Market Procedures extend to any procedures under Chapter 7 and include anything incidental to the retail sale or supply of electricity or related services. The Retail Market Procedures definition is extremely broad<sup>1</sup>. The intent of the original IEC governance is that those parties to the transactions (for commercial reasons, to meet regulatory obligations etc) should be making decisions about the transactions, service levels etc., not a number of non-impacted parties. The current or new IEC need to encourage service innovations and product innovation and AEMO should not have the opportunity to constrain the IEC work direction or the IEC Recommendations with such a broad clause. B2B Proposals for related services should be able to be reviewed on their merits without the need to be constrained by the significant volume of procedures under Chapter 7. Where market settlements is not impacted the IEC Committee should be free to make B2B Recommendations on similar or slightly different or inconsistent arrangements, let the market sort out service evolution and transition of services.</p>
4	Are the proposed obligations on parties appropriate, including the accreditation requirements and Red and Lumo's proposed certification requirements?	<p>UE agree with Red/Lumo that B2B parties need to operate key transactions in a compliant and consistent manner. Services which are transacted in a manner other than a compliant manner create costs through exception management, follow up manual handling, error correction etc. UE agree that there is a need to ensure B2B parties who use the B2B e-hub, including third party service providers who are not registered or accredited in other roles, have accreditation and certification obligations imposed.</p> <p>However, whilst UE support that parties using the hub need to be accredited or registered, UE query that there is a need to write into the NER that AEMO must establish and maintain certification guidelines and may exempt persons from any one or more</p>

<sup>1</sup> Retail Market Procedures - Procedures made under these Rules for or in connection with the sale and supply of electricity to retail customers or the operation of retail electricity markets including: (a) B2B procedures; and (b) the Market Settlement and Transfer Solution Procedures; and (c) the metrology procedures; and (d) other procedures dealing with, or incidental to, the retail sale or supply of electricity or related services.

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		<p>certification requirements. These are matters best left to the IEC to determine if there is a need to certify, who could be exempt from certification and when re-certification is required. These should be managed by a technical guideline under the IEC. AEMO should not be able to determine to exempt parties from certification requirements where there may be impacts on other parties.</p> <p>Given the extent of the B2B changes, UE support that there is a certification or readiness capability for all parties to transact under the new arrangements in a compliant/consistent manner. It is important that connection and supply related matters are consistent, mandated transactions across all B2B parties.</p> <p>UE suggest that the drafting proposed by Red/Lumo in 7.17.2 (c), (f) and (g) not be included in the NER. The Red/Lumo drafting that allows the IEC to determine any other matters related to B2B Procedures in 7.17.3 (a) (7) should be able to include the certification and re-certification requirements in a technical guidelines or hub/B2B use document. Any party can propose these certification requirements, including AEMO, however the IEC should be the governing body.</p> <p>Red/Lumo note that accreditation allows AEMO to check that B2B parties have the appropriate IT and security to interface with and use the B2B e-hub, should this be considered necessary. Red/Lumo also suggest this is more important going forward with advanced services and may present higher risks. The framework being established does not require parties to use the e-hub and does not prevent parties using the B2B transaction content and some other means of communication. These risks still exist and AEMO accreditation with the best intent will not eliminate the risk, in the eftpos/meter churn/role churn environment with innovative IT services to each meters on the distribution network.</p>
5	What would be the benefits of, or issues with, requiring third parties to become registered participants to use the B2B e-hub?	<p>UE consider that requiring third parties to becoming registered participants increases the barriers for service delivery and may increase the exposure to unintended or unnecessary rule obligations. Accreditation processes will allow registration for use of the B2B e-hub and enable participant or service provider gateways to allow transactions through for that accredited service provider ID. A minimal effective accreditation process for registration to use the B2B e-hub should be progressed.</p>
Box 5.2 Impact of changes to B2B arrangements under recent rule changes		

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1	Given the proposed rules are based on the competition in metering draft rule, what changes should be made to the proposed rules as a result of the competition in metering and embedded networks final rules?	No further comment.
Box 5.3 Questions on implementation		
1	If a rule is made, is a 1 December 2017 implementation date for the new B2B procedures and upgraded B2B e-hub achievable? If not, why not and what is an alternative date?	<p>UE considers that a more complete set of B2B procedures under the new governance arrangements and the new B2B e-hub aligned with metering competition commencement and the end of the Victorian derogation is essential. This is consistent with the COAG view expressed in the Consultation Paper that the B2B framework should be aligned with the new competitive metering framework to maximize efficiencies and benefits for consumers. Without clear agreed industry processes and consistent transaction standards across participants efficiencies embedded for mass market transaction (customers below 160MWpha in Vic) will be reduced. Some information services need to be delivered in a standard manner if customers are to be connected and supplied in a safe and timely manner. This transition needs to be seamless for customers otherwise confidence in the reform will be impacted, this will only occur with successful thorough cross industry testing and certification processes.</p> <p>Many submissions to the AEMC regarding the metering competition rule and the implementation timeframes expressed a view that after procedures are finalized industry needed some 12 months to finalize an industry build pack, build and internally test systems, industry test systems and gain accreditation and certification, plan releases etc. The current AEMO plan that indicates over 50% of the system build phase can be completed without a finalized procedure or a finalized build pack is impractical.</p> <p>UE are supportive of an informal collaborative approach to the development of new and changed B2B processes commencing immediately. This approach does not require finalized rules to establish a governance arrangement. Participants and stakeholders would engage resources to support this at their discretion and the outputs of this work can be injected into formal consultation processes once the IEC is ready to progress these.</p> <p>New and changed B2B Procedures need to be developed, consulted on and finalised by the end of 2016 if the 1 December 2017 date is going to hold for metering competition commencement. UE is concerned that these industry processes generally take longer than this and some registered participants will be more engaged and ready than others. UE continue to support a readiness review and criteria for when industry is ready to move to new arrangements, however this can only commence after industry is given time to</p>

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		<p>develop and implement their internal IT systems changes, it is not effective to start the readiness review the day the procedures are finalized.</p>
2	<p>Which implementation tasks above may be at risk of not being met in the given timeframes and why? Would any of the timeframes need to be adjusted? Can any of these tasks be completed sooner, eg developing the election procedures and operating manual, or do some of them require more time? How would any changes impact other timeframes and the target deadline of 1 December 2017?</p>	<p>UE encourages the AEMC in making its determination on this rules change to consider mechanisms that will allow rapid adoption of an election process for the newly constituted IEC rather than spending time on the definition of an interim arrangement to be in place until the members of the newly constituted IEC are appointed. UE suggests that the current IEC should remain the governance authority for B2B Procedures and associated documentation until the newly constituted IEC is appointed via the election process. UE believes that this approach will encourage a rapid transition to the newly constituted IEC as well as encourage collaboration on the development of B2B processes required to deliver the scope suggested above – work that industry can commence ahead of the final framework. UE considers that the IEC is the appropriate entity to oversee the conduct of the election of the newly constituted IEC.</p> <p>The current IEC should also ensure that a nominated list of contact points for each business in each of the representative segments is established and should commence engaging with these parties as early as possible.</p> <p>The new B2B Procedures need to be developed at the same time or in an aligned manner with the B2M arrangements to ensure that the most cost effective processes are adopted overall. The Final Determination on the revised B2B Procedures cannot be delayed until April 2017, the rules date for completion of the B2B Procedures needs to be end of Dec 2016.</p> <p>As a consequence of the change between the Draft Determination and the Final Determination on the metering competition rule, the scope of the second suite of B2B changes has significantly increased. This backends the development and finalization of B2B Procedures for all the other services in the market beyond the new minimum specification meter services for small customers. The AEMC could correct this earlier by a schedule in the new rule, effective on the rule made date, which allows any party to propose a B2B change, establishes a framework where these three metering roles are properly included in B2B Communication, B2B Objectives and use of the hub etc. If this is done early it sets the scene for all of these parties to take an active interest in all current IEC and reconstituted IEC activities and B2B procedure development earlier rather than derailing any processes later once the reconstituted IEC is able to formally established.</p>

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3	Are any implementation steps missing?	<p>UE notes that there has been a strong focus on the metering competition changes and is concerned that the ENM changes are not overlooked. Inclusion of the ENM roles in the B2B framework will be key to the success of this market change.</p>
4	How much time would participants expect to need to update their systems to comply with the new B2B procedures and use the upgraded B2B e-hub? When can participants commence this work, for example can work commence following publication of draft B2B procedures?	<p>For the initial implementation of the B2B procedures there was substantive change in the Procedures between the Draft Determination and the Final Determination despite the extensive open development process. There was a further phase of finalising a build pack which supports the final decision which took another 3-4 months and did end up with the recommendation that the preferred processes were not correctly aligned to the Final B2B Procedures and so a catch up round of consultation was required before going live. UE understand that this situation also occurred recently with the NSW/ACT gas changes due to be implemented in May 16 and the catch up consultation to the preferred as built arrangements has just commenced. NSW/ACT gas changes completed procedures in Feb 2015 for implementation of changes in May 2016 with much simpler processes and less parties involved.</p> <p>Prior to commencing industry B2B testing there was a 3 week period of technical testing and certification against the AEMO responders to make sure that industry participants were ready to commence cross industry end to end testing. For the initial B2B implementation there were three rounds of industry testing, each round being 3 weeks with a week in between for reporting and defect fixes. At the conclusion of industry testing there is an industry decision whether to proceed and implement or to conduct further testing and defect resolution.</p> <p>The initial B2B Framework from Final Determination to implementation was expected to take 12 months and was delayed several months due to the complexity of system changes. The market back in those days had 22 different companies and 45 entities were participating in the industry testing phase.</p> <p>The new B2B Procedures now deal with around 25 retailers, 13 distributors, say 20-25 MCs, 20-25 MPs and 20-25 MDPs and say 10 ENMs. These are brand new processes not previously used, particularly the new industry roles now associated with high volume basic services. If not all parties are actively engaged and mobilised, when they do become engaged late in the piece, there will be changes to process or procedures that were already agreed. It is important that there is a comprehensive program management plan which defines the governance, decisions making, milestones and sign offs across the industry, regulators and jurisdictions, without a strong Steering Committee for the Program there is potential for poor delivery of the reform.</p>

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		<p>Along with the testing phase, many of these businesses will be developing responses to accreditation requirements, undergoing accreditation audits in the last few months, similarly for the registration activities and contract negotiations occurring. ENMs need to be appointed for the necessary EN and the distributor administration and other activities transitioned. UE strongly recommend that there is an independent program manager with executive industry oversight and coordination to make sure that all of these activities come together, highlight interdependencies and risks.</p> <p>UE re-iterate our earlier comments that there is often change between Draft and Final Determinations which has implications on business decisions and creates additional cost. This is a sizeable project which needs a clear scope and there will be participants who seek a competitive price for a vendor to deliver and manage the implementation of change in their businesses. Some work can commence based on the Draft Determination for example the internal business analysis of requirements and impacts and the design of the new requirements, however they still can't be adequately built without the detailed specification of the interface.</p>
5	<p>Should any of the steps have reduced requirements to speed up implementation, such as an exemption from having to follow the rules consultation procedures? Which steps could be run concurrently with other steps? Are there any further options that could be considered to minimise implementation timeframes?</p>	<p>If the AEMC could amend the Rules to give the IEC the remit to deliver the necessary B2B Procedure changes to deal with metering that is currently in the NEM with the new MC and competitive metering arrangements as early as possible this would facilitate the process. All B2B changes including those for the minimum services scope for small customers need to have reached Final Determination by end December 2016.</p> <p>Small changes, like allowing anyone to propose B2B changes, combined with the open IEC meetings, improved quality of documentation, a consistent approach to working groups and development etc would be useful.</p> <p>Rules consultation processes should not be exempted, these allow public and formal consultation with all interested parties and are a key part of the change process. Not all parties appear to be actively engaged as yet.</p> <p>If B2B Procedures are not to apply to large customers above 160MWhpa or CT/VT customers etc then the IEC should establish this within the application section of the specific B2B Procedure and this must form part of the public consultation processes.</p>