

12 December 2014

Mr John Pierce
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Lodged electronically: www.aemc.gov.au

Dear Mr Pierce,

Re: Enabling metering technology reforms: Consultation on implementation timetable

The Energy Retailers Association of Australia (ERAA) welcomes the opportunity to provide comments in response to the Australian Energy Market Commission's (the Commission) proposed implementation timetable for the Expanding Competition in Metering and Related Services Rule Change (Metering Competition) Consultation Paper (**the Consultation Paper**). Rather than limiting our consideration to the proposed metering reforms, we respond in the context of the complete Power of Choice work package, highlighting the expected timing for industry to implement all proposed Rules and Procedures in systems and processes.

The ERAA represents the organisations providing electricity and gas to almost 10 million Australian households and businesses. Our member organisations are mostly privately owned, vary in size and operate in all areas within the National Electricity Market (NEM) and are the first point of contact for end use customers of both electricity and gas.

The ERAA strongly supports the proposed metering competition reforms and seeks to assist the Commission in developing an efficient and effective implementation program to ensure timely commencement of these reforms, while ensuring the regulatory framework is robust.

An industry view

The Information Exchange Committee (IEC), Australian Energy Market Operator (AEMO), and interested stakeholders have worked together to inform an industry view of the required changes for the Power of Choice as a whole, including the Metering Competition rule change. This industry view was discussed at an IEC-facilitated workshop¹ on 10 November 2014, where the IEC and AEMO invited the Commission, the Australian Energy Regulator, jurisdictions and any interested stakeholders to attend a session discussing the overarching Power of Choice and its impacts on the retail market procedures, systems and processes.

The outcome of the workshop resulted in a project plan being formed as a draft project implementation plan (draft plan) based on industry experience of past implementation and releases of a similar nature. The ERAA note that the IEC and industry have yet to formally consider the draft plan.

It is our view that the draft projected plan provided in this submission is what the industry requires for certainty to ensure that resource levels are considered.

¹ The ERAA notes that the IEC-facilitated workshop did not include all ERAA members and may not be representative of the entire industry.



Key matters

One consistent concern raised at the IEC facilitated workshop was the need for a coordinated approach to implementation that is managed by a dedicated, independent project management team to ensure readiness of all existing and new market participants.

Metering and meter data is integral to the market. It is fundamental to the settlement of the NEM, operation of the wholesale and retail markets and provides the platform for network and customer billing, and innovative pricing and products being offered to the market.

The ERAA notes that the implementation of the Power of Choice work program must be cognisant of any potential customer impacts. The draft plan has been developed to ensure that all considerations are made to provide a seamless customer experience in particular for customer transfers, meter data and customer billing.

As such, the Commission must ensure that the metering reform implementation timeline is realistic and encompasses all changes that are required for new and existing market participants.

Retailer specific information

The ERAA note that some of our members may be able to implement these changes in shorter timeframes, and some members may require a longer timeframe, however, all members accept the draft plan is representative of the industry implementation timeframe.

Supporting project plan

The ERAA provides the supporting draft plan outlining an estimate of the time periods required to complete the following items:

- Rule change consultation processes based on information provided by the AEMC and previous experience, as such some of the consultation timings extend beyond the obligated timeframes under the Law.
- 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 of time periods related to the COAG Energy Council's amendments to the National Energy Retail Rules relating to Smart Meter Consumer Protection.
- Assumptions and dependencies made in the development of the Gantt chart.

Whilst we acknowledge that the draft plan will require further revision as more information is made available, this document sets out some base interdependencies, sequencing and timeframes. The ERAA recommend that the draft project plan is revisited once the Draft Determination has been issued to reassess the implementation timeframe for any reduction in timeframe.

Most importantly, the draft plan groups rule changes (assuming that the implementation is required to be implemented into the existing procedures and systems) into an efficient release schedule where rule changes with similar impacts on procedures, processes and systems have been grouped together to ensure that the implementation of the Power of Choice program is delivered in a means that drives an effective outcome in the long term interests of consumers.

It is for this reason that we believe that a coordinated approach to implementation that is managed by a dedicated, independent project management team is required to ensure readiness of all existing and new market participants.

Attached to this submission is the draft plan (Refer Attachment A) and a table that lists key considerations, outlining risks, recommendations and notes regarding this plan.

While it is important that development of rules and procedures is completed in a robust and thorough manner, we believe a balance can be achieved to ensure that the consumer benefits of the proposed reforms are not unnecessarily delayed. We are hopeful that further assessment of the required tasks may identify further opportunities to reduce the overall timeline without compromising the quality of the regulatory framework.

The ERAA acknowledges the positive consultation process that the AEMC has managed to date.

Should you wish to discuss the details of this submission, please contact me on (02) 8241 1800 and I will be happy to facilitate such discussions with my member companies.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Cameron O'Reilly', written in a cursive style.

Cameron O'Reilly
CEO
Energy Retailers Association of Australia

Attachment A: Table in support of the Gantt chart attached to this submission

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
Rules establishment considerations			
1.	<p>The Gantt must recognise the following fundamental requirements:</p> <ul style="list-style-type: none"> • Scheduled major industry involvement must recognise the practical impacts of the holiday calendar and of other key regulatory change on resource availability and on the difficulty in maintaining continuity of involvement through these periods. • There are other large projects taking place such as NECF implementations, NSW/ACT Gas B2B Project, and EDPRs. 	<p>Tasks or task sequences have been determined with recognition of these matters.</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> <ol style="list-style-type: none"> i) Customer access to data – implementation 1 March 2016 ii) Demand Side Participation Information to AEMO – implementation potentially Q3 2016 iii) Customer Switching Review <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 changes made for metering competition, or if a major change should take effect at a later date when changes to other POC initiatives are being effected.</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

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
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 informed and rigorous input into the release; and • Result in a very large and risky process and IT system change. <p>Conversely, undertaking each Rule and Procedure change independently would be unnecessarily disruptive and result in inefficient rework with material costs.</p>	<p>The Gantt is based on having two releases.</p> <p>Release 1 consists of Rule changes and implementation timeframes required for metering contestability (including SMP), NECF 2 and embedded networks.</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 • embedded networks are a current issue • NECF2 sets the customer protection framework for smart meter services envisaged to be developed. <p>Release 2, Pending an AEMC final determination this release package consists of Multiple Trading Relationships (MTR) and the Demand Response Mechanism (DRM) Rule changes and related process and system changes. Release 2 should occur post completion of Release 1, as these initiatives are less well defined, will require significant system development, and are not an integrated and "essential" component of the contestable metering framework.</p>	NA
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 industry to provide quality input into the drafting of the Rules.</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.</p>	<p>The Gantt includes a four month consultation period consisting of two components:</p> <ol style="list-style-type: none"> 1. A formal consultation response period 2. A period of consideration of the detail of the drafting and the achievement of workable outcomes. The expectation is that through this period (or even for part of the whole period) workshops on details of the drafting will be held by AEMC. <p>[Note: this is where the AEMC implementation plan release deviates from the draft implementation plan].</p>	52, 53, 54

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
5.	<p>The various Rule 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. 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 metering competition rule needs to be finalised first, as this is the most complex rule change and has the highest risk to delaying the development of the market. The remaining POC initiatives should be sequenced following the completion of the metering competition rule change process.</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
6.	<p>The individual rule changes which together constitute a release, must have co-ordinated Final Determination dates. Unless carefully co-ordinated it is possible that the individual Rule changes may cause stakeholder confusion.</p> <p>These individual Final Determinations could be on the same date or could be staggered to aid the co-ordination process.</p> <p>Achieving of co-ordination with the AEMC drafted changes in NERR for contestability and those in the NERR being driven by the COAG for NECF2 has numerous challenges that needs to be considered.</p>	<p>The Gantt considers the Meter Contestability Rules changes to be the major and hence “lead” Rule change. The final determination of the Rules will set the major outcomes of Release 1 and set the major drafting changes in the Rules.</p> <p>The Gantt also reflects a Task Dependency for the release of the AEMC final determination on the Embedded Network and the Meter Contestability Rule change.</p> <p>Sequentially the NECF2 NERR Rules change “Final Determination” from the ERMWG for COAG has a Task Dependency from the ENM 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, 73, 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

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.

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
8.	It is very desirable for the ENM 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.	The Gantt has a Task Dependency supporting this desirable sequence of tasks.	51 and 64 54 and 68
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.	The Gantt is drafted on this basis. However, the scope and content of this rule 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 re 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.	The Gantt includes Task assigned for this issue.	79
11.	<p>The criteria for the commencement of the Rule changes for Release 2 (MTR, DRM, and Transfer Review outcomes) should be no overlap with the Release1 Rule changes (should the Commission decide to include MTR and DRM into the Rules).</p> <p>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.</p>	The 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.	160→

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
Procedure considerations			
13.	<p>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.</p> <p>This should not inhibit the implementation of the governance of the overall program of work and the reporting and information forums commencing.</p>	<p>The Gantt assumes two months from the Contestability Rule changes Draft Determination before work on the Procedures and SMP commences.</p>	Various
14.	<p>Based on discussion at the IEC/AEMC workshop and some statements in the 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>The Gantt has a Task Dependency for the Service Level Procedure Draft Determination from the Meter Contestability Rules changes Final Determination.</p>	83 linked to 54

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
15.	The Release 1 Rules changes (meter contestability, embedded networks, NECF2) 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	The Gantt includes an attempt to recognise these various dependencies, and to stagger the Procedure developments. However opportunities for this to occur without impacting on the critical path are limited. Hence there remains a risk that the Procedure development process may be compromised by lack of industry SMEs, and result in changes and delays during the design/build phase.	Various
16.	A number of the Procedure changes have complex dependencies on multiple Rule final determinations and interdependency on other Procedures. Draft Determinations will be complicated and involve a potential need for workshops on details	Instead of allowing the normal 20 days for the draft determination the Gantt includes the maximum permitted 45 days for the Draft Determination to allow time to hold adequate meetings.	Various
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.	The Gantt has a Task Dependency for the SMP Procedure Final Determination from the SMP Governance rule Final Determination.	164 has link from 61
18.	The ring fencing requirements are currently very uncertain and could result in resource and system changes being imposed on Distributors. 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. Adding ring fencing requirements which need a level of system change, after the Release 1 built scope is otherwise finalised will add additional cost and potentially impact build timelines.	The Gantt has dependency on the implementation time schedule from the AER Guideline determination.	169 linked to 172

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
System Release Impact Considerations			
19.	<p>Despite the fact AEMO commenced 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 finalised Procedures.</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>	<p>The Gantt has a dependency such that the industry implementation time schedule does not commence until the Build Package is in place.</p>	<p>172 is linked to 165</p>
20.	<p>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 Files in market 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 coordinated 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 	<p>The Gantt design, build, test and release tasks are drafted on this basis.</p>	<p>172-174</p>

Ref	Consideration	Mitigation/Gantt chart outcome	Gantt Ref Row(s)
	<p>service provision the failure of implementation for one service provider could impact a number of Participants</p> <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 Co-ordinators (MCs) and/or service providers, is to have accreditation processes in place for 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>	<p>The Gantt includes the development of accreditation processes and documentation and the actual accreditation process.</p>	177-179
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. This will allow time for the consolidation of Release 1 and the complete operationalisation 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. Any overlap between the Release 1 and 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. 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>	<p>The Gantt relationship between Release 1 and Release 2 is cognisant of this position.</p>	

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

ID	Task Name	Duration	Predecessors	Successors	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.

ID	Task Name	Duration	Predecessor	Successor	Scheduled Start	Scheduled Finish	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
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																											

