

## B2B Procedures

- Customer and Site Details
- Service Orders (version change)
- Meter Data (version change)
- One Way Notification (version change)
- Technical Delivery Specification (version change)

## CONSULTATION – First Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Powershop Australia Pty Ltd

***Completion Date:*** 26 April 2018

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## Option and commentary for long term solution

Powershop Australia Pty Ltd (**Powershop**) is supportive of a change to the B2B procedures to allow participants to use email as an interim solution for exchanging additional life support information to meet the new obligations subject to:

- the changes to the B2B procedures being minimal and not placing substantial additional obligations on participants; and
- the information exchanged using email is secured in a manner that is consistent with Australian Privacy Principles (**APPs**).

Such changes should be the minimum necessary to permit such an outcome while development of a more complete solution using the existing B2B Hub infrastructure is undertaken.

This concept of minimal change for the interim solution was articulated by Peter Van Loon to the IEC in his capacity as a discretionary member of the IEC representing small retailers and was noted by the IEC as an approach suitable for consideration in this consultation.

Although it is not stated in the consultation material, we assume this is a consultation in accordance with the B2B procedure change process set out in Rule 7.17.4 of the National Electricity Rules. We were unable to identify who has proposed this change. Rule 7.17.4(f) requires that changes to the B2B procedures must be proposed by a person other than the IEC and such a proposal when provided to the IEC must include details of the proposed changes including supporting information (i.e. reasons for the proposed change). We assume that this change was proposed by the B2B Working Group.

In addition, while the IEC may have received advice from AEMO whether any changes are required to the B2B Hub and if so any likely costs for such change, the details of that advice are not included in the consultation material as required by Rule 7.17.4(i). We are proceeding on the basis that the advice was that there will be no changes to the B2B Hub and no costs will be incurred in proceeding with an interim email solution.

We also note that the consultation material appears to be missing a report setting out an overview of the likely impact of the proposal on AEMO and B2B parties. Such a report would normally be included in a B2B procedures change pack and would be a critical element for enabling appropriate consultation on the B2B proposal. Again, we are proceeding on the basis a change pack was not considered necessary due to the minimal nature of the proposed change. Obviously if a more substantive change imposing specific mandatory obligations on participants was being contemplated we would expect to see full compliance with all of the rule change procedures noted above.

To this extent, we remind the IEC of the importance of the B2B principles and in particular a requirement for efficient, effective and reliable communications.

We also remind the IEC that any decision to modify the B2B procedures under Rule 7.17.4 should have regard to National Electricity Objectives as well as the B2B factors and the B2B principles.

Notwithstanding the above, we support the intent behind the AER proposal and subsequent AEMC rule change and recognise the importance of ensuring life support information is shared and available in an efficient, effective and reliable manner.

We are concerned that the detail of the proposed solution is inconsistent with the intention of a minimal change, interim solution and is more consistent with a full change to the procedures requiring a detailed consultation pack.

We are also concerned about the use of email, particularly for any extended period of time without due consideration to its reliability and security limitations.

Given the highly sensitive nature of the information to be exchanged, consideration of privacy implications will be required. It should be noted that the APPs place strict restrictions on the handling of sensitive information which specifically includes health information. In particular, the APP guidelines explicitly state that email is not a secure (or acceptable) form of communication.

In light of the above, it is clear that changes will need to be made to the proposal to ensure it is capable of being implemented whilst still maintaining minimal impact given its interim nature. In our view, this could be best achieved by:

1. Encouraging the use of standard form template emails through amendments to the B2B non mandatory guidelines and not within the enforceable B2B procedures. This should also include guidance on appropriate security and reliability techniques including password protection and monitoring and managing confirmations of receipt. This would need to address the use of recommended forms of encryption as required under the APP guidelines.
2. Fast tracking the development of the B2B Hub as this will enable the use of the significant investment made by industry in this secure and reliable communications platform. This could include the development of a simple translation tool to enable participants to utilise the interim email solution (and/or a simple CSV upload/download feature within the existing LVI) to access the more secure, reliable and auditable hub and enabling participants to develop their own direct hub access, systems and process in their own time frames.

Our experience with the Power of Choice changes is that concerns about the speed of change to the use of the B2B Hub, as the central means of communications, may be capable of being addressed via AEMO developing a simple translation tool (and/or modifying the existing POC translation tool) to enable participants to utilise existing internal processes (e.g. email) while awaiting the completion of the development and testing of a full B2B tools, systems or processes.

In response to Matter under Consultation: *list of procedures which the IEC is proposing to amend and develop under this consultation* we see the only change necessary to the procedures is a statement that expressly allows the use of emails for the purpose of this interim solution.

We also wish to raise the following specific matters.

- The transaction set details as proposed, whether utilising the B2B Hub or email, must cater for multiple records applying to the same site or NMI. For example, multiple persons may reside at the same site with different life support equipment requirements, different contact arrangements and different medical confirmations. Given the importance of managing life support equipment, it is also highly likely that life support equipment customers will want to provide more than one set of contact details for management purposes.
- We do not believe that there is a requirement to include the form of life support in any data interchange. The Rules specifically require only that retailers and distributors advise each other of the customer's requirement for life support equipment and not the particular form of equipment.
- Any solution should provide the best means of efficiently and effectively meeting the objectives of the rule change, and in particular ensure the safety of customers is best protected. Given that following Power of Choice many participants have the ability to impact supply to customers (Metering Coordinators and Metering Providers for instance), any solution should support the simple sharing of life support information to such participants.

In the matter of Long Term Solution Options, clearly a central repository is not appropriate as an interim solution. However, we do not have sufficient information to determine the benefits of a central repository versus a B2B solution as a more complete solution given the consultation does not include the necessary reports and details that would normally be provided in a consultation pack. Such reports and information setting out an overview of the likely impact of any proposal on AEMO and B2B parties, alignment to the B2B principles and in particular the requirement for efficient and effective and reliable communications is required.

While there may be potential benefits associated with a central repository, the basis of those benefits and countervailing costs and impacts have not been identified. However, it would appear that the use of existing infrastructure and systems, including use of the standard B2B Hub (whether utilising a translation tool or not) and/or elements of the MSATS standing data system would enable compliance with the Rules in a cost effective and efficient manner consistent with the B2B principles.