

20 January 2017

Dear AEMO

We refer to our attached participant response in relation to the Second Stage Consultation for the B2B procedures and related documents.

Powershop is fully committed to supporting an efficient rollout of the new B2B procedures and the shared market protocol. In particular we believe that procedures and protocols that support efficient and effective metering competition in a manner consistent with the National Electricity Objective, the B2B principles and B2B factors will be an important factor in maintaining customer choice and delivering good customer outcomes.

However to be truly efficient and effective any new procedures and protocols must not impose any unnecessary additional obligations on existing or future retailers or other participants. This is of course a direct corollary of the National Electricity Objective and explicitly required by the B2B principles and the B2B factors.

While we have provided some limited commentary in your response template format we wish to particularly draw your attention to the following matters.

Notified Parties: The procedure seeks to create a new concept of notified parties and impose obligations on participants to provide a number of notifications that are not required by the NER or NERR. We believe it is inappropriate to attempt to impose obligations in procedures (and beyond the power of the working group and IEC in any event). This is also inconsistent with the concept of backward compatibility which the IEC confirmed at its meeting in June 2016 was to be a key design element of the B2B procedures.

Service Order Types and Sub-Types: The B2B procedures make substantial changes to the service order types and sub-types which are beyond the requirements of Power of Choice, again such changes are inconsistent with the principles of backward compatibility and a solution involving either an amendment to support backward compatibility or the development of an appropriate translation mechanism must be developed if the procedures are to meet the design principles set out in the B2B principle and factors.

One-to-many: The new connections process in the new procedures requires a number of complex transactions rather than a single one-to-many solution which would enable an efficient use of the system for such transactions. The failure to support one-to-many transactions in the procedures is disappointing as we understand as recently as November 2016 the IEC was expecting the systems working group to develop and deliver a one-to-many transactions solution as part of the procedures. Support of one-to-many transactions will be central to the requirements



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for backward compatibility and a failure to implement such a system would be inconsistent with the requirements of the B2B factors.

If you have any questions in relation to this matter feel free to contact Chris Murphy on 0419105243.

Kind regards,

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