2 Februrary 2023

Attn: Ed Chan
Australian Energy Market Commission
GPO Box 2603
SYDNEY NSW 2001

Lodged online

Dear Ed

Draft Report – Review of the regulatory framework for metering services

The Information Exchange Committee (IEC) is a statutory body established under the National Electricity Rules responsible for developing, managing and making changes to electricity Business-to-Business (B2B) Procedures. The IEC includes electricity industry representatives from the Australian Energy Market Operator (AEMO), retailers, distributors, competitive metering companies, embedded networks and a representative from Energy Consumers Australia. The IEC has a statutory role as set out in the National Electricity Rules (NER) (Attachment A).

The IEC is pleased to provide the feedback on the AEMC's draft report relating to the Review of the regulatory framework for metering services. The IEC is supportive of the balanced approach the AEMC has taken when considering the materiality of the issues raised, the potential costs and likely benefits to be derived from the review's proposed changes, and the risks, issues and opportunities raised by different types of stakeholders.

The IEC submits the following comments for the AEMC's consideration:

- At this point in time, after an initial discussion including advice from the B2B Working Group (B2BWG), the IEC believe there are likely to be some impacts on existing B2B communications and processes, and potentially new B2B transactions required to meet the recommendations raised in the draft report.
- More work is required to determine the extent of these changes, and this cannot be performed until after the AEMC has published its final report (expected in June 2023), and the subsequent rule change proposals (proposed for late 2023, 2024).
- The IEC requests that the proposed implementation timing for any change to the rules notes the current ambitious regulatory forward program of work and take into consideration the appropriate lead times that will be required by industry and the B2BWG to (a) fully assess the impacts on current B2B Procedures/transactions; (b) to agree; (c) to draft a response; (d) to consult and (e) to implement any B2B changes.

The IEC welcomes discussion and continued collaboration with AEMC at any stage of its reviews and consultations should the IEC be able to assist the AEMC better understand any potential B2B changes.

Should you wish to discuss further, please contact the IEC secretariat at iec@aemo.com.au.

Yours sincerely

Mr Kee Wong

Chair Information Exchange Committee

cc: Violette Mouchaileh, Executive General Manager, Reform Delivery

Attachment: Attachment A List of Current Information Exchange Committee Members

Current Information Exchange Committee Members

Member Category	Representative
Chair	Mr Kee Wong AEMO director
Retailer (industry elected)	Ms Stefanie Monaco Manager Regulatory Affairs, Red Energy
Distributor (industry elected)	Mr Luke Jenner Chief Operating Officer, Essential Energy
Metering (industry elected)	Mr Paul Greenwood Industry Development Lead, Vector Metering
Consumer representative	Brian Spak Energy Consumers Australia
Retailer (AEMO discretionary)	Mr Peter Van Loon Telstra Energy
Distributor (AEMO discretionary)	Vacant
Embedded Networks (AEMO discretionary)	Mr Marco Bogaers Executive Director, Metropolis

IEC Statutory Role

 In fulfilling its statutory role in relation to managing the ongoing development of B2B Procedures and any changes to them, the IEC works collaborative across the different stakeholder groups in the energy sector to:

- Make recommendations on B2B Procedure changes and oversee the consultation process.
- In conjunction with AEMO, consider implications of potential policy changes which may affect B2B Procedures and contribute to B2B Procedure delivery management and prioritisation.
- Identify B2B Procedure continuous improvement opportunities.