B2B PROCEDURES VERSION 2.2

INITIAL CONSULTATION PARTICIPANT RESPONSE PACK

Participant: ERM Business Energy

Completion Date: 26/08/2014

ERM Business Energy has responded in relation to:

- Table 9.3: the proposed changes to the B2B Meter Data Process.

9.3 PROPOSED CHANGES TO THE B2B PROCEDURE METER DATA PROCESS

Please complete the relevant columns below in order to record your response. If you have no comments on this document please note this as a general comment in the table.

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedures text	Rating (H/M/L[1])	AEMO Response
			Blue underline means insert Red strikeout means delete		
9.3.2	721	Effective date should be May 2015. This is because the proposed procedure would require system changes which could not be implemented by 22 November 2014.	N/A	M	

[1] L= Low: Not critical. Issues / comments are minor. They add clarity to the document. No major concern if not included in any further revisions
M= Medium: Important. Strong case that issue / comments should be considered and an update to the document is desirable, but not critical.
H= High: Critical. The issues / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

Item	ID	Clause/Issue/Comment	Proposed revised B2B Procedures text	Rating (H/M/L[1])	AEMO Response
9.3.3	721	a a. In our experience, current industry practise allows issue of a ProvideMeterRequest witn two business days. MPDs are currently responding to these requests with actual data. This timeframe is important for ERM to manage our trading position as well as billing/cash flow. The benefit of extending this period to four business days is unclear, particularly because MDPs have automated processes to respond to ProvideMeterRequests where data is available (i.e. following the second day). AMI meters should also be included in the clause, as networks bill based on calendar month, and treatment as type 5 leads to unacceptable delays. a c. In our experience, data for type 7 metering installations is generally available on the third business day. We therefore consider it appropriate that issue of a ProvideMeterRequest after three business days should be allowed.	**3.2.3 Timing Requirement for a ProvideMeterRequest** a. A Participant must not issue and ProvideMeterDataRequest relating to a scheduled reading event prior to the completion of: a. ~~Four~~ Two Business Days following the read event for type 1, 2, 3, ~~and~~ 4 and AMI Metering Installations; b. Six Business Days following the published Next Scheduled Read Date for type 5 and 6 Metering Installations; and c. The third ~~seventh~~ Business Day of the calendar month for the previous month's MDFF Data, for type 7 Metering Installations	H	