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Mr Sebastian Roberts  
General Manager  
Regulatory Affairs – Electricity  
Australian Competition and consumer Commission  
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Dear Sir

**Proposed amendments to the National Electricity Code  
B2B Governance**

Thank you for the opportunity to comment on the applications for authorisation of amendments to the National Electricity Code (Code) relating to business to business (B2B) communications.

I offer the following comments for your consideration on behalf of CitiPower and Powercor who, as Distribution Network Service Providers, are affected Code participants.

CitiPower and Powercor support the development of national B2B standards and protocols to ensure that information critical to electricity retail competition can be exchanged between parties efficiently. The current jurisdictional based processes are less efficient and carry a risk that there will be divergence in the B2B standards which would adversely affect the efficiency of retail competition in the National Electricity Market.

There has been extensive industry participation and consultation to develop this proposal for a B2B governance structure under the Code which will ensure a single set of B2B standards are developed for the National Electricity Market.

CitiPower and Powercor believe these Code changes will implement an effective governance structure for B2B standards and encourage the ACCC to authorise the amendments.

Yours sincerely

Rolf Herrmann  
Manager Regulation