evoenergy

Evoenergy pass-through application

Unlocking CER benefits through Flexible Trading Arrangements

Submission to the Australian Energy Regulator

December 2025

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1. Introduction

Evoenergy submits this application to the Australian Energy Regulator (AER) seeking approval to recover costs associated with implementing Flexible Trading Arrangements (FTA). On 15 August 2024, the Australian Energy Market Commission (AEMC) made the "Unlocking consumer energy resource (CER) benefits through FTA" rule change, amending the National Electricity Rules (NER) to require the introduction of FTA. This reform also involves consequential updates to Retail Market and Business-to-Business (B2B) Procedures.

The FTA rule change is part of broader reforms to unlock CER benefits. It will enable energy service providers to separate and manage flexible CER from passive loads in the energy market and enable large customers to engage multiple retailers at a single connection point. The rule change also allows the use of in-built measurement capability for streetlights, street furniture and electric vehicle chargers.

Implementation of FTA required the Australian Energy Market Operator (AEMO) to develop and consult on changes to market procedures and system specifications. These changes defined mandatory obligations for distribution network service providers (DNSPs), including required updates to internal systems to recognise new meter types, accept new data formats, and enable billing for the new meter types.

To comply with new rules and procedures, Evoenergy will incur material additional costs of $4.5 million (nominal) to implement FTA. These unplanned and unforeseeable costs were not included in the AER's determination of Evoenergy's revenue allowance for the 2024–29 regulatory control period.

As the implementation of FTA constitutes a service standard event under the pass through provisions in the NER, Evoenergy is seeking the AER's approval for a cost pass through of $4.5 million (nominal). This results in a revenue pass through amount of $1.5 million (nominal, smoothed) to be recovered over the remainder of the current 2024–29 period.

In this pass through application, Evoenergy sets out the details of its actual and likely increase in the direct control costs to comply with the rule change. This application includes the information required for the AER to assess the proposed positive pass through amount and follows the AER's approval of Evoenergy's request for an extension of the time limit to submit a pass through application.

2. Flexible Trading Arrangements

2.1 Background and regulatory context

The FTA rule change introduced new metering types (Type 8A, 8B and Type 9) and secondary settlement points (SSPs) to support flexible energy models. Specifically, these changes allow large customers to engage more than one retailer for different asset types and enable metering for streetlight and street furniture:

- Type 9 meters will be able to be used at primary connection points for street lighting and street furniture. From 31 May 2026, smart devices like EV chargers and streetlights can be used as Type 9 meters, allowing them to participate in market settlement, provided they are able to measure their own energy and meet AEMO standards.[1]
- Type 8A meters will be able to be used at primary connection points and SSPs at large customer premises.
- Type 8B meters will be able to be used at SSPs for small to medium customers.[2]

To continue meeting our obligations as a local network service provider (LNSP) under the NER, Retail Market Procedures, and B2B Procedures, Evoenergy must ensure its systems can communicate with market participants and remain aligned with the current market structure.[3] Evoenergy is implementing the minimum required obligations under the national framework. [4]

This includes updating internal systems to:

- Recognise new meter types in IT systems – to support identification of flexible loads (e.g. EVs, batteries, and smart appliances) connected at the primary connection point. Evoenergy will not have visibility of secondary settlement points.
- Update site and connection data for AEMO – to comply with AEMO procedures. This includes registering new NMIs for any new primary connection points introduced under FTA and updating standing data for existing NMIs to reflect changes such as meter type and participant roles.
- Process new data formats – to receive and interpret metering data from Metering Data Providers for new meter types in updated formats, supporting accurate billing, settlement, and network charge allocation at the primary connection point. When meter data from a secondary settlement point is received, Evoenergy will not forward or process it further for other market participants or customers, as this is not an LNSP obligation.

Evoenergy identified the positive pass through event in relation to the FTA rule change made by the AEMC on 15 August 2024. At the time the rule was made, Evoenergy could not accurately identify and assess the costs of implementation. While the FTA rule change established the framework for FTA, it was the updated Retail Market Procedures, and B2B Procedures which outline the detailed implementation obligations. Given this uncertainty, Evoenergy sought and

[1] In-built measurement devices and external measurement devices will be considered a meter for the purposes of this meter type (if they meet requirements set out in the NER, including pattern approval by the National Measurement Institute).
[2] Available at: AEMC Final determination Unlocking CER benefits through flexible trading August 2024.
[3] Evoenergy, as a distribution business, is a local network service provider under the NER.
[4] While the FTA rule enables distribution network service providers to establish secondary settlement points and participate in flexible trading, doing so would require a separate contestable entity and costs that cannot be recovered through regulated network tariffs. Evoenergy will not pursue these competitive activities.

was granted an extension to submit this cost pass through application to allow sufficient time for AEMO's procedural work to conclude and for Evoenergy to develop a robust, evidence-based cost estimate.

3. Costs to be incurred as a result of FTA rule change

3.1 Billing and Market Systems Platform – Velocity

Velocity is Evoenergy's core Billing and Market Systems platform, supplied by Gentrack. Velocity is responsible for invoicing customers for network use of system (NUOS) charges, managing fee-based services, and ensuring compliance with National Electricity Market (NEM) obligations under multiple participant IDs. Velocity also supports compliance with market and businesses to business interactions.

Velocity operates as an on-premise solution, which was the standard approach when implemented. While this architecture is relatively older than modern cloud-based alternatives, it still has remaining asset life and vendor support. Although being on-premise means the platform requires bespoke upgrades (unlike cloud systems that benefit from shared platform updates), Velocity remains the least-cost solution for delivering essential functionality central to Evoenergy's NEM compliance, management of meter data, and NUOS invoicing, outage notifications, and registration of Life Support premises.

Within Evoenergy's ICT architecture, Velocity interacts with other core platforms through an integration layer. It exchanges data with ArcFM GIS for geospatial asset information, Cityworks for works management, and PowerPlan for asset planning. These integrations are critical to Evoenergy's network operations with Velocity heavily relied on as a network data source. Velocity also depends on Evoenergy's corporate ICT infrastructure, including servers, storage, and security tools, to maintain performance and cybersecurity.

The FTA rule change only impacts Velocity because it is responsible for the billing and market-facing transactions governed by NEM requirements. Importantly, the change applies exclusively to standard control services, as these services involve regulated NUOS charges, specifically the distribution network use of system component, and compliance obligations. Consequently, Evoenergy's pass through application focuses on updating Velocity to maintain compliance and operational integrity with minimal changes to other ICT platforms.

3.2 Business requirements

To comply, Evoenergy must undertake significant system and process changes within the Velocity application, including:

- Acceptance of new data structures
- Integration of new meter types (8A, 8B, and 9)
- Acceptance of new standing data fields
- Implementation of billing functionality for Type 9 metering.

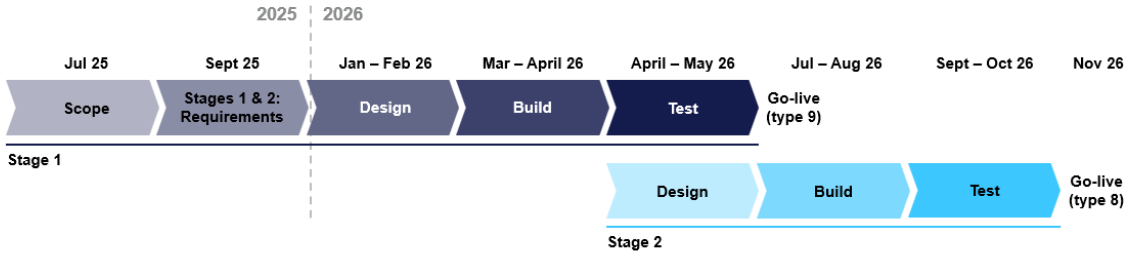
The changes are mandated by AEMO's updated market procedures to:

- Introduce new standing data fields and NMI classifications for SSPs and Type 9 NMIs.[5] Velocity must be upgraded to recognise and accept SSP data for market transactions, even though Evoenergy does not bill SSPs. This ensures compliance with MSATS and accurate data exchange with AEMO and other market participants.
- Define new meter types (8A, 8B, and 9) and associated characteristics.[6] Velocity must integrate these meter types into its asset and billing modules, noting that billing applies only to primary connection points and Type 9 NMIs.
- Update service order flows, notifications, and meter data processes.[7] Velocity must support these workflows to maintain interoperability with retailers and metering providers.

3.3 Implementation timeline

We must complete work in the current 2024-29 regulatory period to ensure we meet the compliance timeframes as determined by the AEMC. Our timeline to ensure project delivery is presented in Figure 1.

Figure 1 FTA project implementation



Our FTA implementation plan is split up into the following categories:

- Scope – Identify systems and processes affected by the rule change and define what's in and out of scope.
- Business requirements – Document regulatory and operational needs for compliance.
- Solution design – Plan system updates and integrations to support the rule.
- Build – Build and roll out system and process changes.
- Test – Confirm that changes function as intended and meet compliance through testing.

3.4 Options analysis

To meet the minimum compliance requirements by the mandated implementation dates of 31 May 2026 and 1 November 2026, Evoenergy undertook a detailed analysis to identify the most prudent and cost-effective pathway. Evoenergy has considered 3 options which are summarised below.

[5] Available at: AEMO 2025 Flexible Trading Arrangements.
[6] Ibid.
[7] Available at: AEMO IEC Flexible Trading Arrangements (FTA) Consultation.

Option 1 – Do nothing

This option was deemed non-credible and will lead to a failure to comply with market and B2B procedures.

Option 2 – Engage a new platform (or platforms) to replace the current Velocity implementation

This option would involve replacing Evoenergy's existing billing system and market interface system with a new vendor solution. The FTA rule change requires specific functionality upgrades, not a wholesale system overhaul. The time and cost associated with procuring, integrating, and testing a new billing and market interface system (or systems) would far exceed that required to implement the required changes within the existing system and lead to Evoenergy not meeting mandated compliance timeframes. This option has not been costed but is expected to be significant.

Option 3 – Upgrade the existing Velocity platform (preferred option)

Evoenergy's current billing and market interface system, Velocity, does not have the capability to support the FTA rule change without substantial system and process changes. To address this, Evoenergy proposes modifying the existing Velocity platform. These changes will deliver the required functionality changes at least cost, while leveraging the existing system architecture.

To ensure the proposed solution was prudent and efficient, a detailed set of business requirements was developed, informed by the rule change and AEMO procedures. These requirements formed the basis of the request for a formal development and implementation quote from Gentrack. A fixed-price arrangement was selected to provide cost certainty, reduce delivery risk, and ensure accountability for scope and outcomes sits with the vendor rather than customers.

Preferred option

Option 3 is recommended because it represents the lowest-cost and most practical approach to complying with the FTA reforms. This option reflects good industry practice, ensures systems and processes remain fit for purpose, and offers the lowest implementation risk by building on the known capabilities of existing systems.

It also provides the highest level of confidence in meeting compliance timeframes, as the changes involve incremental enhancements to an existing IT environment rather than a full system replacement. Additionally, it avoids the complexity of full system replacement or onboarding a new vendor.

3.5 Implementation of the preferred option

This section outlines the system and business process changes required to implement the changes to comply with the FTA rule change.

The impact on each system has been assessed based on the degree of change, associated effort, and risk of achieving successful implementation within the required timeframes. All systems are deployed to maintain market compliance and support standard control services. There are 21 functional changes and 1 non-functional change required for the May 2026 release and a further 58 functional changes and 21 non-functional changes required for the November 2026 release.

Stage 1 (31 May 2026 release – Type 9 metering)

Based on an assessment of the procedural changes, the Type 9 metering related system changes will address the following:

- Velocity (Billing and Market Transactions): Enable acceptance of new Meter Installation Type Codes (COMMS9 and COMM9CMS) in CATS transactions (30XX and 510X series), update invoicing mode flags and reading sequences, and apply existing Type 4 billing validations to Type 9 meters.
- Meter Data Services (MDS): Store meter data for COMMS9 and COMM9CMS as a subset of COMMS4 metering.
- Integrations: Update ArcFM extract logic to classify COMMS9 and COMM9CMS correctly (Installation Classification values 9 and 10), and extend Cityworks integration for register handling and service order information.
- Database: Add COMMS9 and COMM9CMS to EMS_MCLASS table and ensure related parameter updates.

Stage 2 (1 November 2026 release – Type 8 metering)

The second stage introduces Type 8 metering (COMMS8), Premises Connection Points (PCP), Secondary Settlement Points (SSP), and a new role of premises network services provider (PNSP). System changes will include:

- Velocity: Accept COMMS8 in CATS transactions, implement new Change Request Codes (e.g., 2040, SPND, SSDU, SCLR, SCFR), store new field IsPCP in INSTALL table, and apply monthly invoice calendar for PCP NMIs. Extend TRIGQUEUEBATCH and EMS1506 processes for COMMS8 and apply COMMS4 validations to COMMS8.
- MDS: Maintain hierarchy for meter data quality flags for COMMS8, handle replacement meter data events for PCP NMIs, and ensure correct processing of interval data.
- Integrations: Update ArcFM extract for COMMS8 (Installation Classification value 11) and extend Cityworks integration for new meter types.
- B2B/B2M Interfaces: Update schema versions to r47 and extend service order handling for new types and subtypes (e.g., Commission Meter, Update Standing Data).
- Database: Add COMMS8 to EMS_MCLASS, create lookup tables for PCP and SSP, and update parameter tables for new codes and descriptions.

Overall, the changes to Evoenergy systems necessary to comply with the FTA Reforms include:

- Development of existing in-house and vendor-supplied modules to accommodate new functionality
- Integration between systems and new meter devices
- Increased storage capacity in central metering systems to accommodate the growing volume of data
- Updates to schema and parameter tables for new roles and transaction types; and
- Comprehensive testing to ensure accurate reception, storage, and management of third-party data across the end-to-end process.

Testing and assurance activities will include end-to-end validation of market transactions, billing accuracy, and data integrity across Velocity, MDS, and integration layers. Cybersecurity checks will be performed to maintain compliance with Evoenergy's ICT standards.

3.6 Cost components

Evoenergy's cost estimates are based on a bottom-up assessment of the resources and services required to implement the FTA rule change. Due to the scale of the project and the specialised technical expertise it requires, existing internal teams cannot deliver these changes without compromising business-as-usual operations. To maintain continuity and meet project timelines, Evoenergy will need to backfill roles (through additional internal labour resources or labour hire) by engaging external contractors. The proposed pass through amount reflects only incremental costs directly attributable to the rule change.

The implementation costs are primarily delivered through:

- Labour: Evoenergy applied contractor rates sourced from vendors currently providing services to Evoenergy, which were market-tested during recent procurement processes. For each required role, Evoenergy applied rates derived from recent procurement outcomes. This approach ensures the estimates are consistent with current market conditions. Labour hours were estimated based on detailed project planning, including system requirements, process design, testing, and delivery activities. Seven contractor roles have been identified to be engaged, some on a full-time basis and others part-time, depending on the complexity and duration of their tasks. All roles require specialised skill sets in analysis, system integration, testing, and compliance delivery, which are essential to meet the mandated FTA implementation timelines.
- Procurement: Gentrack is the only vendor able to provide these services because Evoenergy's existing systems are built on Gentrack's proprietary platform, and the required development can only be performed by the platform owner. Evoenergy obtained a fixed-price quote from Gentrack for system development and implementation services. The quote was based on a detailed set of business and technical requirements to ensure scope clarity and delivery accountability.[8] The quote was assessed against historical costs for similar ICT change projects to ensure its reasonableness and alignment with market expectations for projects of comparable scale and complexity.

A detailed cost build-up model is attached to this application.[9]

Evoenergy sought to reduce costs by delivering Stage 1 and Stage 2 concurrently wherever practical. While this approach allowed significant efficiencies, certain activities, particularly system testing, must be completed separately. As a result, a small portion of testing costs will fall in the 2026–27 financial year.

Evoenergy has also taken steps to validate key cost drivers and minimise costs. Several workshops were held with relevant technical and subject matter experts to understand the system and business impacts and align on the key changes required. This process informed the identification of necessary technical changes for each relevant system, associated business process changes, and the development of the project team structure and resourcing needed to implement these changes. Business and System Requirements for the May and November FTA

[8] Evoenergy – Attachment 4 – Gentrack quote – December 2025 – Confidential.
[9] Evoenergy – Attachment 2 – FTA cost model – December 2025 – Confidential.

releases are attached to this application to provide the AER with clear visibility of the specific system changes required.[10]

4. Positive change event

The NER includes cost pass through provisions that allow Evoenergy to seek recovery of materially higher costs incurred in providing direct control services, where those costs arise due to a pass through event. The pass through events are defined in the NER, and include, but are not limited to, a 'service standard event' and a 'regulatory change event'.

We consider that the FTA rule change constitutes a 'service standard event' for the purposes of the NER.

4.1 Service standard event

Under Chapter 10 of the NER, a service standard event is defined as an administrative or legislative decision that occurs during the regulatory control period and has the effect of:

- Substantially varying the manner in which a DNSP provides direct control services, or
- Imposing, removing or varying minimum service standards applicable to direct control services, or
- Altering the nature or scope of those services, and
- Materially increases the costs of providing those services.

The implementation of the FTA, comprising changes to the NER along with consequence changes to the Retail Market and Business to Business Procedures, constitutes a service standard event.

The reforms substantially vary the manner in which Evoenergy provides direct control services, including changes to how Evoenergy interacts with market systems and other businesses. These changes require significant system and process redesign and materially increase the costs of providing direct control services (as outlined in section 3). As such, the FTA rule change satisfies all elements of the service standard event definition.

4.2 Alternative classification as regulatory change event

If the AER does not accept the FTA rule change as a service standard event, Evoenergy submits that it should alternatively be treated as a regulatory change event. In either case, the relevant date of the event is 15 August 2024, the date on which the AEMC made its final rule determination and Evoenergy's new obligations under the rule legally commenced.

[10] Evoenergy – Attachment 5 – FTA cost pass through requirement for May 2026 release – December 2025 – Confidential; Evoenergy – Attachment 6 – FTA cost pass through requirements for November 2026 release – December 2025 – Confidential.

4.3 Extension under clause 6.6.1(k) of the Rules

On 14 November 2024, Evoenergy requested an extension of time from the AER under clause 6.6.1(k) of the NER. The extension was sought to allow AEMO's development and procedural work to progress, so Evoenergy could properly assess and quantify the costs associated with implementing the required changes under the FTA rule change.

On 17 December 2024, the AER advised Evoenergy that it was satisfied that the proposed extension is necessary and granted an extension until 15 November 2025. Subsequently, Evoenergy requested a further modest extension to 15 December 2025, which the AER approved on 1 October 2025.

4.4 Materiality threshold

Under the NER, a cost increase is considered material if it exceeds 1% of Evoenergy's annual revenue requirement for a given regulatory year.

Table 1 sets out the applicable materiality threshold and demonstrates that the costs incurred and forecast to be incurred by Evoenergy as a result of the FTA rule change exceed this threshold in 2025–26 regulatory year.

Table 1 Materiality of Evoenergy's FTA cost pass through

million, $nominal	2024–25	2025–26	2026–27	2027–28	2028–29
Opex	0	0	0	0	0
Capex	0	2.8	1.7	0	0
Total expenditure	0	2.8	1.7	0	0
Approved unsmoothed revenue	173.94	185.05	183.23	193.30	184.44
Materiality		**1.53%**	**0.92%**		

4.5 Eligible pass through amount

The eligible pass through amount refers to the increase in costs in the provision of direct control services that, as a result of the positive change event. Based on Evoenergy's bottom-up assessment of required resources, the eligible pass through amount under cause 6.6.1(c)(4) for the positive change event arising from the FTA rule change is $4.5 million (nominal) as shown in Table 2.

Table 2 Eligible pass through amount to comply with FTA

million, $nominal	2024–25	2025–26	2026–27	2027–28	2028–29	Total
Opex	0	0	0	0	0	0
Capex	0	2.8	1.7	0	0	4.5
Total expenditure	**0**	**2.8**	**1.7**	**0**	**0**	**4.5**

4.6 Proposed positive pass through amounts

Under clause 6.6.1(c)(4) of the NER, we must specify the positive pass through amount proposed for the positive change event, which cannot exceed the eligible pass through amount. For the FTA rule change, we propose a positive pass through amount of $1.5 million (nominal, smoothed). This amount reflects the increase in required revenues for the 2024–29 regulatory period due to the rule change. It includes incremental operating expenditure,[11] return on and of capital associated with the additional costs of implementing FTA, and the corresponding impact on the corporate income tax building block.

The NER clause 6.6.1(c)(4) also require that a pass through application specify the proposed positive pass through amounts to be recovered from customers in each regulatory year. Consistent with our attached post-tax revenue model (PTRM), the proposed positive pass through amounts for each regulatory year in the 2024–29 regulatory period are set out in Table 3.

Table 3 Proposed positive pass through amount in each regulatory year

million, $nominal	2024–25	2025–26	2026–27	2027–28	2028–29	Total
Return on capital	0	0	0.17	0.27	0.25	0.69
Return of capital (regulatory depreciation)	0	0	0.22	0.36	0.39	0.97
Operating expenditure	0	0	0.00	0.00	0.00	0.01
Net tax amount	0	0	(0.04)	(0.04)	(0.02)	(0.10)
Incremental annual revenue requirement (unsmoothed)	0	0	0.36	0.59	0.62	1.56
Incremental annual revenue requirement (smoothed)	**0**	**0**	**0.52**	**0.51**	**0.51**	**1.54**

[11] An incremental amount of debt raising costs, calculated in the PTRM.

To minimise the difference between smoothed and unsmoothed revenue in the final years of the regulatory period, we propose recovering the positive pass through amount in 2026–27 year, rather than spreading it across all remaining years the current regulatory control period. This approach maintains revenue stability and avoids creating a large residual gap at the end of the period. We are open to discussing alternative recovery timing with the AER.

5. AER's assessment criteria under cl 6.6.1(j)

Evoenergy has included only incremental costs that are solely attributable to the FTA rule change in the costs of the passthrough event. All expenditure has been reviewed to ensure it:

- Is directly linked to compliance with the FTA rule change obligations, specifically the implementation of AEMO procedures required under the rule change as discussed in section 3.1.
- Excludes any overlap with business-as-usual activities funded under the current regulatory determination. The ICT Plan for the 2024–29 regulatory period explicitly states that Evoenergy did not forecast any non-recurrent compliance-related activities.[12] All proposed ICT investments in the plan were either recurrent lifecycle upgrades or strategic enhancements aligned with business needs and customer expectations. Therefore, the costs included in this cost pass through application are incremental and solely driven by new regulatory obligations introduced after the commencement of the current regulatory control period.
- Reflects prudent and efficient delivery of required system and process changes. Section 3 describes Evoenergy's approach to determining costs. To ensure prudency and efficiency, we used market-tested rates. This process provided confidence that the proposed costs are reasonable, efficient and aligned with industry best practice.

Dedicated project codes and work orders have been used to capture costs, ensuring clear segregation from other programs. Internal governance processes have been applied to validate scope, cost drivers, and manage delivery risks.

[12] Evoenergy – Appendix 1.22 – Information Communication Technology Plan, p 32.

6. Appendix A Compliance checklist

Table 4 Compliance with the NER

Clause	Requirement	Response
6.6.1 (c)	To seek the approval of the AER to pass through a positive pass through amount, a Distribution Network Service Provider must submit to the AER, within 90 business days of the relevant positive change event occurring, a written statement which specifies:	This application has been submitted within the timeframe specified by the AER, following an approved extension to the original 90 business day period.[13] See section 4.2 and 4.3
(1)	the details of the positive change event	The FTA rule change sets out the regulatory obligations that must be met, while the procedures developed by AEMO specifies requirements to implement those obligations. Together, they form the basis of the positive change event for the purposes of this application. See section 2 and 3.
(2)	the date on which the positive change event occurred	The event occurred on 15 August 2024. See section 4.3.
(3)	the eligible pass through amount in respect of that positive change event	The eligible pass through amount in respect of the positive change event in this application is $4.5 million (nominal). See section 4.5.
(4)	the positive pass through amount the Distribution Network Service Provider proposes in relation to the positive change event	The requested positive pass through amount and the resulting revenue adjustment for the pass through amount are provided in the application. See section 4.6.
(5)	the amount of the positive passthrough amount that the Distribution Network Service Provider proposes should be passed through to Distribution Network Users in the regulatory year in which, and each regulatory year after that in which, the positive change event occurred	The proposed positive pass-through amounts for each regulatory year in the 2024–29 regulatory period are set out in Table 3, see section 4.6.

[13] See AER, Letter to Evoenergy, Extending the timeframes for submitting a positive cost pass through application relating to the rule change Unlocking CER benefits through flexible trading, 17 December 2024.

(6)	evidence of the actual and likely increase in costs referred to in subparagraph (3); and that such costs occur solely as a consequence of the positive change event	See section 3 for the detail on our approach to meeting the new obligations, our costing of this approach, how we have minimised the costs, and the resulting incremental costs. Appendix C also provides a list of supporting evidence submitted with this application.
(7)	such other information as may be required under any relevant regulatory information instrument	N/A

7. Appendix B Job descriptions

Role title	Included in application	Description
Subject Matter Expert (Energy Industry)	Yes	This role is responsible for interpreting complex FTA requirements, advising on best practices, and ensuring compliance with relevant Rules and Procedures. The SME leads the operationalisation of FTA within business and technical processes, including translating AEMC determinations and AEMO procedures into actionable steps and business processes. Key activities include defining system and process changes, validating metering and settlement configurations and guiding stakeholders through implementation.
Tester	Yes	This role is responsible for validating FTA functionality and integration across systems throughout the Software Development Life Cycle (SDLC). Develops and executes test plans and scripts, ensuring compliance with AEMO procedures and NER/NERR. Verifies accurate implementation of business and system requirements. Identifies and documents defects, collaborates with developers and business teams for resolution, and performs regression and user acceptance testing. Confirms readiness for deployment and supports quality assurance across all project phases.
Business Analyst/Trainer	Yes	This role acts as a bridge between technical teams and stakeholders by gathering requirements, analysing impacts, and documenting FTA processes throughout the SDLC. Develops comprehensive training materials and delivers workshops to business users on new roles, metering changes, MSATS updates, and FTA operational workflows. Supports change management activities, ensures stakeholder readiness, and provides ongoing guidance to support a smooth implementation.
Project Manager	Yes	This role oversees planning, coordination, and delivery of the FTA project. Manages timelines, budgets, and stakeholder engagement to ensure compliance with AEMO procedures and NER/NERR. Coordinates technical, regulatory, and operational streams, mitigates risks, and ensures successful implementation of FTA solution.

8. Appendix C Document list

Evoenergy - Attachment 1 – Evoenergy 2024-29 - PTRM - 2025–26 RoD update - Distribution - March 2025 – FTA adjustment - December 2025 – Public

Evoenergy – Attachment 2 – FTA cost model – December 2025 – Confidential

Evoenergy – Attachment 3 – FTA cost pass through PTRM input – December 2025 – Public

Evoenergy – Attachment 4 – Gentrack quote - December 2025 – Confidential

Evoenergy – Attachment 5 – FTA cost pass through requirements for May 2026 release – December 2025 – Confidential

Evoenergy – Attachment 6 – FTA cost pass through requirements for December 2026 release – November 2025 – Confidential

Evoenergy – Attachment 7 – FTA cost pass through confidentiality claim – December 2025 – Public