

CHANGE PROCESS FOR EAST COAST GAS RETAIL MARKETS

PREPARED BY: AEMO Markets
VERSION: 3.0
EFFECTIVE DATE: 9 August 2019
STATUS: FINAL

VERSION RELEASE HISTORY

| Version | Effective Date | Summary of Changes |
|---------|----------------|---|
| 0.1 | 01/10/2012 | Initial draft for GRCF and GRCF-N&A. |
| 1.0 | 11/12/2012 | Feedback from CFs and RBPWG meeting held October and November 2012. |
| 2.0 | 01/01/2016 | Updated to reflect changed Retail Market Forum Framework. |
| 3.0 | TBA | Renamed "Change Process for East Coast Gas Retail Markets" (from "Change Management Process for Gas Retail Markets"), updated to align with Electricity Retail Consultative Forum Change Process to and prescribe the GRCF's annual prioritisation session. |

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1. INTRODUCTION

The Australian Energy Market Operator (AEMO) facilitates gas retail markets in New South Wales and the Australian Capital Territory, Queensland, South Australia, and Victoria (collectively, the east coast), for which it publishes jurisdictional gas Retail Market Procedures (RMP) and Technical Protocols (collectively, the Procedures). These are changed in accordance with the Approved Process under Rule 135EC (Approved Process) of the National Gas Rules (NGR).

AEMO has established the Gas Retail Consultative Forum (GRCF) in line with section 4 of the Approved Process to advise and assist AEMO in making Procedures. This document outlines how AEMO will implement the Approved Process for east coast gas retail Procedure changes. It also provides details on pre-Approved Process steps, which are referred to in this document collectively as the “pre-regulatory process”.

For the avoidance of doubt, this document does not apply to procedures published with respect to Western Australian gas retail markets facilitated by AEMO.

2. CHANGE PROCESS FOR EAST COAST GAS RETAIL MARKETS

2.1. Purpose

This document sets out the following:

- a) the pre-regulatory process for the east coast gas retail markets, including registering issues/changes and prioritisation
- b) the process for managing changes to the Procedures via the GRCF, in line with the Approved Process
- c) the timeframes associated with the change process
- d) the requirements for developing a gas market issue or proposed procedure change for submission to AEMO
- e) the framework to implement major IT system changes

The change process recognises that a modification of the Procedures may also alter the functionality of the retail market systems. This document aims to promote consistency and harmonisation of processes, timings, and regulatory obligations across east coast jurisdictions and markets.¹

2.2. Intended audience

| Role | Description |
|---------------------------------|--|
| Participants (existing and new) | Participants may wish to raise changes to the Procedures through the GRCF and will as such require an understanding of the change process for east coast gas retail markets. Further, market participants as well as internal AEMO and participant project teams will need an understanding of the change process to provide effective advice and assistance to the GRCF in terms of prioritising initiatives and in the making of Procedures. |

¹ Separate change management processes apply to east coast gas wholesale markets, the east coast Gas Bulletin Board (GBB), and any WA gas markets or systems.

| Role | Description |
|--------------------|--|
| Interested persons | Market agencies ² , consumer groups and their representatives, jurisdictional bodies, and other persons as appropriate may wish to remain informed of proposed gas retail Procedure changes without necessarily wanting to inform or initiate changes themselves. |

2.3. Scope

The scope of this change process covers both the pre-regulatory and the regulatory change processes. The pre-regulatory process is a series of steps involving registering an initiative (issue/change); prioritisation; and evaluation of the proposed solution without time restrictions.

The regulatory process is bound by Part 15B of the NGR, which outlines a list of subject matters that can be covered in the Procedures under the Approved Process.

2.4. Related documents

There are a number of related documents or artefacts that have been issued and should be read in conjunction with this document.

| Reference | Title | Location |
|-----------|---|----------------------|
| 1 | Gas Retail Consultative Forum (GRCF) Terms of Reference | Link |
| 2 | Approved Process under Rule 135EC of the NGR | Link |
| 3 | Electricity Retail Consultative Forum Change Process | Link |
| 4 | Gas Market Issue (GMI) template | Link |
| 5 | Proposed Procedure Change (PPC) template | Link |

2.5. Issue / Change Register

AEMO has established the 'Issue / Change Register' to support the change management process for gas and electricity retail market changes. This document is managed by AEMO and records the life cycle of an issue, from lodgement to implementation or rejection (See Appendix C for a diagrammatical representation of the life cycle of an issue). This document is circulated as part of GRCF meeting packs, which are publicly available on the GRCF page of AEMO's website.

This change register records all gas market issues and procedure changes lodged with AEMO. Each gas retail issue is assigned a unique identifier known as an Issue Number (IN)³. The information in the change register assists AEMO and the GRCF in prioritising changes to Procedures.

2.6. Relevant consultative forums and working groups

In addition to the GRCF, AEMO may also convene working groups as required to assist in the developing a more detailed understanding of any changes proposed for large programs of work, especially where the changes are complex.

² These being the Australian Energy Market Commission (AEMC), Australian Energy Regulator (AER), and Coalition of Australian Governments Energy Council.

³ The Issue / Change Register also contains WA gas retail and east coast electricity B2M retail issues. WA gas retail issues are also given an IN; however, they are appended with "W" to differentiate them from east coast initiatives (so IN001/19 would be an east coast issue, whereas IN001/19W would be a WA issue). Electricity issues "Issue and Change Form" (ICF) numbers, so changes are marked as ICF_XXX.

If the nature of the change impacts IT systems, the Change Process also notes the engagement of two other groups which must be briefed / consulted for retail market and other relevant changes:

1. IT Development Forum (ITDF)

The ITDF agrees on the adoption of proposed changes relating to the technical procedures/standards and system interfaces that impact market systems, as directed by the GRCF⁴.

2. aseXML Standards Working Group (ASWG)

The ASWG is responsible for the development and maintenance of the aseXML standard. The ASWG reviews proposed changes to the schema but is not responsible for the underlying business processes that utilise the schema or for the processes to deliver change requests for consideration.

The GRCF, working groups, ITDF, and ASWG cooperate to ensure any proposed changes to Procedures that impact systems and processes meet the National Gas Objective (NGO). More detailed information regarding the terms of reference for the GRCF, current working groups, ITDF, and ASWG is available on the AEMO [website](#).

3. ANNUAL PRIORITISATION SESSION

Each year, AEMO tables a proposed prioritisation strategy and a list of initiatives from the Issue / Change Register with the GRCF for consideration. These are a list of initiatives that AEMO has identified as candidates to be considered for consultation in the following calendar year.

The annual review commences in the fourth quarter of each year. When developing the list of initiatives to progress, AEMO undertakes a review of all gas initiatives on the Issue / Change Register. AEMO will consider any potential impact of known major projects⁵ on resources. Initiatives that have fixed NGR timelines are given priority.

Once the GRCF finalises and endorses the list of initiatives, it is placed under version control. Any updates to this list will be referred to the GRCF prior to any changes being accepted.

4. CHANGE PROCESS

In terms of the change process, the primary role of AEMO is to facilitate consultation and implementation (where appropriate) of changes by providing the necessary administrative and centralised project office services for industry. In this way, AEMO seeks to ensure that changes are documented, registered, communicated, evaluated, authorised, tested, and implemented in a consistent and timely manner.

This change management process consists of three areas:

1. Pre-regulatory process for changes to the Procedures.
2. Regulatory process as prescribed under the Authorised Process and NGR.
3. Implementation of the approved change.

⁴ The ITDF also deals with the STTM, DWGM and combines with the Technical Working Group to discuss WA retail market system issues.

⁵ Major projects include gas and electricity.

4.1. Pre-regulatory process

Prior to the formal lodging of a PPC, the actions in the following diagram are followed in order to elicit and investigate issues and develop possible solutions and Procedure changes. There are no time restrictions associated with the pre-regulatory process.

| Stage | Proponent / GRCF Action | AEMO Action |
|--|--|--|
| 1. Submit Gas Market Issue (GMI) | <p>Proponent completes the GMI template⁶ provided on AEMO's website, which includes a clear description of the issue to be resolved, any identified solution(s), any costs and benefits associated with the solution(s) and an indication on criticality of the issue and whether it needs to be added to the current year's prioritisation list.</p> <p>Proponent may (as necessary) contact AEMO for assistance with completing the GMI prior to formally submitting the GMI at grcf@aemo.com.au.</p> | <p>AEMO provides, if requested, initial assistance in completing the GMI prior to its formal submission.</p> <p>This include a preliminary assessment on whether the change falls within the retail market provisions of the NGR.</p> |
| 2. AEMO review and consider GMI 3. Agree requirements | <p>Proponent responds, as relevant, to AEMO initial feedback and any requests for further information from AEMO.</p> | <p>AEMO reviews the GMI and determines the likely procedural or system impacts would be as a result of the proposed change and consults AEMO's internal legal, operational business, and IT teams as relevant.</p> <p>If AEMO requires additional information from the Proponent regarding requirements for a solution to the GMI, AEMO requests further information.</p> <p>AEMO adds the GMI to the agenda of the next GRCF meeting for discussion or sends it to the GRCF via circular email.</p> |

⁶ GMI template includes -Description of issue, Reference documentation, Specific proposal, Consequences, Likely benefits for industry as a whole, Process impact, Impact of issue not proceeding, Any critical timelines to consider.

4. Review GMI and advise on proposed options

GRCF may provide feedback on the GMI to AEMO and the proponent, advising specifically with relevance to:

- Prioritisation (Does the issue need to be added to the current year's priorities?).
- The magnitude of the change (Does the change likely require IT system changes?).
- Whether the change upholds the NGO (Does that change have compelling case to return a net benefit?).
- Whether the change can be bundled with similar changes therefore potentially minimising costs and reducing the overall time to consult on and implement a number of GMIs.
- An implementation timeline (if the change requires IT system changes, do these IT system changes need to be synchronised across industry? Is a schema change required?).

The GRCF may, where the change is complex, elect to hold additional meetings or to implement ad hoc evaluation processes⁷ to determine the most cost-effective solution to the issue, and comparing any proposed solution(s) and a "do nothing" solution.

The scope and granularity of any ad hoc evaluation process should be "in balance" with the magnitude of the likely costs to implement the change (i.e. the larger the likely costs, the higher the level of precision in the ad hoc evaluation process needs to be).

Determining the scope of any ad-hoc evaluation processes will be done collaboratively, with the GRCF putting forward a recommendation (unanimous or otherwise) to AEMO. AEMO will decide whether to accept the GRCF's recommendation or apply an alternate ad-hoc evaluation process. These meetings or ad hoc evaluation processes may be iterative, with additional work being undertaken to

AEMO assists GRCF in determining most cost-effective solution to the issue.

AEMO and Proponent review GRCF feedback.

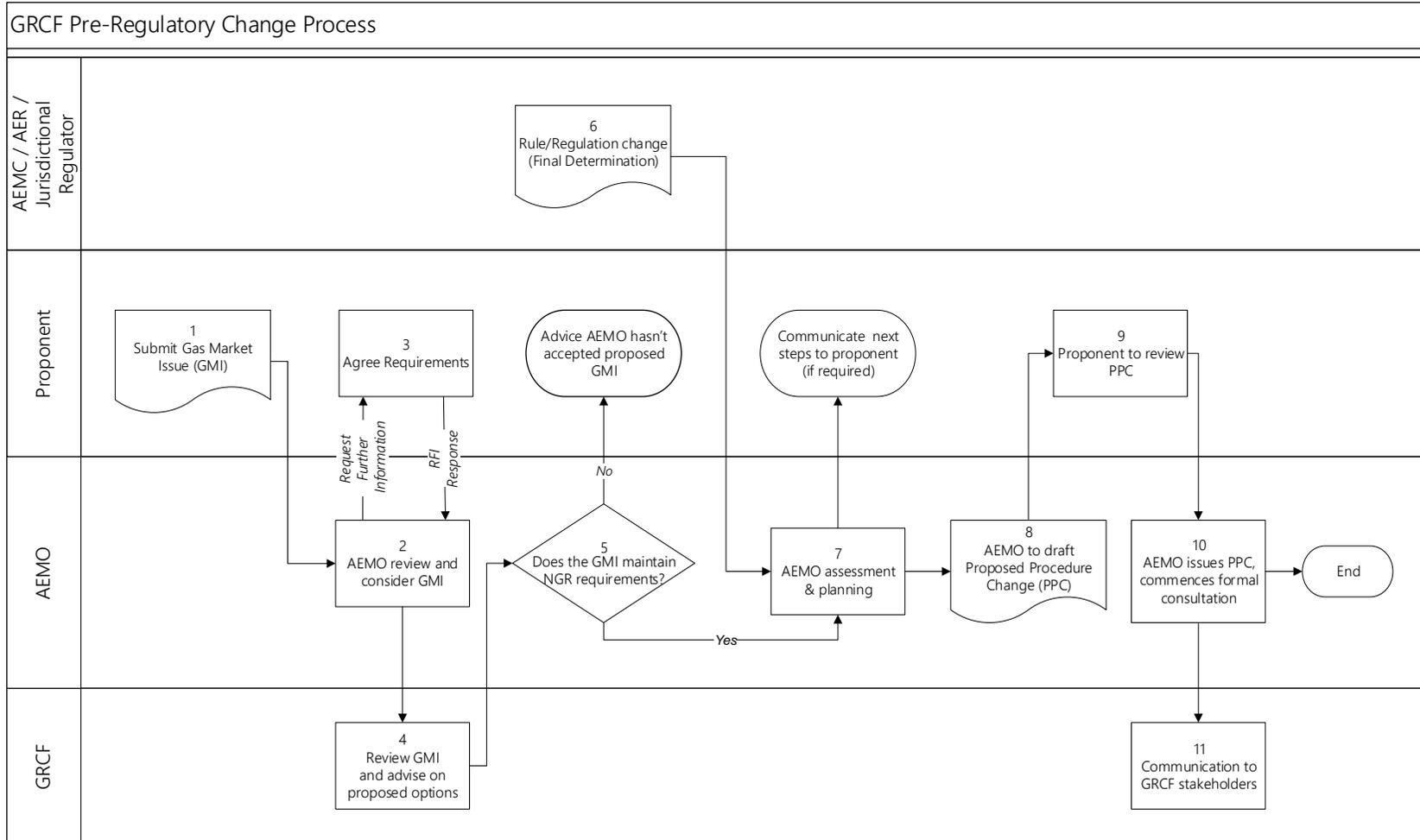
| Stage | Proponent / GRCF Action | AEMO Action |
|-------|---|-------------|
| | <p>remove, amend, or include new solution options.</p> <p>A “do nothing” solution is always an option. Where this option is assessed as the most efficient outcome, the process ends.</p> <p>If the GRCF decides to progress GMI as a priority (same calendar year) the GRCF will need to provide advice on whether the list of initiatives noted in section 3 needs to be revised.</p> | |

⁷ Whatever evaluation processes is applied, the process must generate an outcome on materiality and an indication on whether the proposal will return a net benefit to industry as a whole.

| Stage | Proponent / GRCF Action | AEMO Action |
|---|-------------------------|---|
| 5. Does the GMI maintain NGR requirements and uphold the NGO? | | <p>Having considered feedback from the GRCF, AEMO decides whether any proposed changes in the GMI maintain the obligations set out in the NGR, whether the proposed changes are within AEMO's power to include in Procedures under the NGR, and whether the proposal upholds the proposal upholds the NGO.</p> <p>If AEMO decides any proposed changes in the GMI do not maintain the obligations set out in the NGR, are not within AEMO's power to include in Procedures under the NGR, or fail to uphold the NGO, AEMO will advise the Proponent that the change has been rejected and the process will stop here.</p> <p>If the change is accepted, AEMO registers GMI in the change register (as "pending") and allocates a unique issue number (IN).</p> <p>If the Proponent and the GRCF indicate that the issue needs to be added to the current calendar year's work, AEMO will determine the resourcing impact and work with the GRCF to determine how best accommodate this additional request. Otherwise the issue remains on the register as "pending" and will be reviewed as part of the annual prioritisation process described in section 3.</p> |
| 6. Rule / Regulation Change (final determination) | | <p>AEMO registers change in the Change Register and allocates a unique issue number (IN).</p> <p>AEMO determines requirements for the rule or regulation change.</p> |

| Stage | Proponent / GRCF Action | AEMO Action |
|--|---|--|
| 7. AEMO assessment and planning 8. AEMO to draft PPC | | AEMO determines prioritisation of the issue, taking into account GRCF and Proponent advice. AEMO drafts required changes to procedure and completes the PPC template. |
| 9. Proponent to review PPC | Proponent reviews PPC to ensure that the proposed changes meet the requirements for their issue, taking into account the solution agreed by the GRCF. | |
| 10. AEMO issues PPC, commences formal consultation 11. Communication to GRCF stakeholders | | AEMO sends PPC to GRCF and publishes on AEMO's website. This begins the formal regulatory change process set out in the Approved Process. |

It is not mandatory to complete the pre-regulatory process under the change process as a Proponent may opt for a formal process through the immediate lodgement of a PPC. However, AEMO recommends that the pre-regulatory process is utilised where there are multiple options or where input from other registered participants and AEMO is desirable.



4.2. Regulatory process

The formal regulatory process is prescribed in the Approved Process and in the NGR. As noted above, this process is generally preceded by the pre-regulatory process. The following table provides a high-level explanation of the obligations as prescribed in the Approved Process and the NGR. Where there is any inconsistency, the Approved Process and the NGR take precedence.

| Stage | Proponent / Participant / GRCF Action | AEMO Action |
|--|--|---|
| PPC <i>(Note: PPC stage commences from lodgement date and can run up to 40 business days. Generally, 30 business days allowed)</i> | <i>(if pre-regulatory process was not completed)</i> Proponent reviews PPC ⁸ to ensure that the proposed changes meet the requirements for their issue, taking into account the solution agreed by the GRCF. | <i>(if pre-regulatory process was not completed)</i> AEMO registers change in the change register and allocates a unique issue number (IN). AEMO determines requirements for the rule or procedural change. AEMO drafts required changes to procedure and completes the PPC template. AEMO sends PPC to GRCF and publishes on AEMO's website. |
| | If required, Proponent or their representative presents PPC at the GRCF meeting for discussion. GRCF may provide feedback on the GMI to AEMO and the proponent, advising specifically with relevance to the matters under clause 4(c) of the Approved Process and to whether the change upholds the NGO. GRCF may propose alternative solution(s) to the issue, comparing any proposed solution(s) and a "do nothing" solution. A "do nothing" solution is always an option. Where this option is assessed as the most efficient outcome, the process ends. | AEMO records GRCF outcomes. AEMO maintains change register. If determining whether the change upholds the NGO becomes problematic, AEMO will work with the GRCF on an efficient and effective methodology that will assist AEMO in making an NGO determination. AEMO decides whether an extension of time is required. If so, AEMO publishes a notification of extension on the AEMO website and advises the GRCF. |
| IIR | <i>Note: Ordinary: at least 20 business days of consultation. Expedited: at least 15 business days of consultation.</i> | AEMO decides whether expedited or ordinary change process to be used. |

⁸ A PPC template includes description of change(s) and reasons for change(s), reference documentation, high-level details of the change to the existing procedures, consequences for making or not making the change(s), explanation regarding the order of magnitude of the change, likely benefits for industry as a whole, the likely implementation effect of the proposal on industry in general and/or on any identified parties (e.g. end-users), and testing requirements.

| Stage | Proponent / Participant / GRCF Action | AEMO Action |
|--|---|---|
| <i>(Note: IIR stage is completed in accordance with NGR)</i> | | AEMO completes IIR template. AEMO issues IIR for consultation and publishes on AEMO website. The IIR will note the position of all submissions on the PPC. |
| | GRCF provides submission on IIR to AEMO. | AEMO collates information. AEMO maintains change register. |
| Decision | <i>Ordinary: decision published within 20 business days of IIR consultation closing.</i> <i>Expedited: decision published at least 15 business days before the effective date of the Procedures.</i> | AEMO publishes its decision, taking into account submissions received. |

4.3. Implementation process

When there are major system changes impacting industry from a proposed change, the following implementation tools may be used if required.

4.3.1. Industry design workshop

Overview

An industry design workshop may be held once AEMO provides a decision approving the changes. The purpose of this workshop is to allow impacted Participants to gain a common understanding of the implementation detail and agree the scope of industry testing. The workshop occurs at a point where Participants will have completed their initial technical design. Participants at the workshop are able to use this meeting to refine their technical understanding of the implementation and to define the test scenarios needed to manage the implementation risk.

Release Document

As part of the industry design workshop process, AEMO may prepare a 'Release Document' describing the implementation package, including all Procedure changes. The purpose of the release document is to provide the catalyst for the initial review required to identify the full scope of an implementation.

This Release Document may be placed under version control (see section 4) and managed by the GRCF to ensure all aspects that impact the final implementation are fully documented and all impacted Participants are aware of and agree to any developments as they arise.

4.3.2. Release management

The GRCF may choose to establish a Release Management meeting. It would be expected the attendees of the meeting are:

- Familiar with IT systems.
- Experienced in industry testing.

- Knowledgeable in cut-over processes.

The activities of the meeting attendees could include:

- Finalising scope of work for the group and develop a work program to meet the target implementation date for the release.
- Reviewing the changes being implemented and define a program of tests.
- Developing test scripts for each of the defined tests.
- Defining test data requirements and gather and collate this data.
- Defining requirements for testing including environments, test harnesses, timing, likely resourcing and impact on operations.
- Documenting the test program.
- Defining success/failure criteria.
- Documenting the industry implementation procedures.
- Escalating issues to GRCF where necessary.
- Managing the testing program.
- Managing the implementation program.
- Conducting a post-implementation review.

A Release Management meeting would report to the GRCF.

Industry Implementation Plan

AEMO may prepare an industry implementation plan that describes the industry cut-over plan. The plan would provide details of the events relating to, timing of, and those responsible for the activities associated with the implementation of the industry changes. The document would cover a number of key activities such as timing requirements to switch off systems, clearing remaining transactions from gateways (both outgoing and incoming), shutting down gateways, manual procedures to be invoked while the system outage is occurring, and commencement of changes.

5. VERSION CONTROL PROCESS

Version control ensures that the process of change is managed and auditable. When an updated version of document under this Change Process is issued with a new scope, new information, or new timing, this will be reflected by means of an updated version number.

AEMO will distribute the updated version to the GRCF and all versions of a consultation document will be published on AEMO's website. This allows the GRCF to clearly identify amendments and ensures that authorisation is received for any changes proposed.

APPENDIX A. ACRONYMS, ABBREVIATIONS AND DEFINITIONS

| Term | Definition |
|--------------------|---|
| AEMO | Australian Energy Market Operator |
| AER | Australian Energy Regulator |
| aseXML | A Standard for Energy Transactions in XML |
| ASWG | AseXML Standards Working Group |
| B2B | Business to Business |
| B2M | Business to Market Operator (AEMO) |
| DB | Distribution Business (or Network Operator) For the Retail Markets that operate in SA, NSW and ACT the term 'Network Operator' is used. In Victoria and Queensland, a Distribution Business is termed a 'Distributor'. |
| FBS Administration | The party responsible for administering the FRC B2B System. This is currently AEMO. |
| FRC | Full Retail Contestability |
| FRC Hub | The FRC Hub is an XML Gateway that is nominated to act as a central transit point for all B2B transactions for participants in Victoria, Queensland and South Australia. The key characteristic of the FRC Hub compared to a Gateway is that the hub receives and routes all messages, so there is additional emphasis on routing, throughput, availability, and management tools. |
| GIP | Gas Interface Protocol This is a Technical Protocol that outlines the system and business process documents which must be used for Victorian and Queensland Retail Market transactions. The GIP is given its head of power in both the NGR and the RMP and is made up of Participant Build Packs. |
| GMI | Gas Market Issue This is a template used by a proponent as a precursor to the formal change process (Approved Process). |
| GRCF | Gas Retail Consultative Forum |
| ICD | Interface Control Document This is a Technical Protocol that outlines the system and transactions which must be used between AEMO and participants in the South Australian gas retail market. In South Australia, the ICD forms part of the Specification Pack. |

| Term | Definition |
|-------------|---|
| IIR | <p>Impact and Implementation Report</p> <p>This is a document produced by a proponent as a following the completion of the formal change process (Approved Process). This is prescribed report under the NGR, rule 135EB.</p> |
| IN | Issue Number |
| GBB | Gas Bulletin Board |
| NGL | National Gas Law |
| NGR | National Gas Rules |
| NGO | <p>National Gas Objective</p> <p>Section 23 of the NGL states that the NGO is:</p> <p>... to promote efficient investment in, and efficient operation and use of, natural gas services for the long term interests of consumers of natural gas with respect to price, quality, safety, reliability and security of supply of natural gas.</p> |
| Participant | A person registered with AEMO to participate in a retail gas market. |
| PBP | <p>Participant Build Pack</p> <p>There are four Participant Build Packs, which detail the technical standards and business processes that enable participants to pass information between each other in a uniform method. The Gas Interface Protocol is comprised of this set of documentation.</p> |
| PPC | <p>Proposed Procedure Change</p> <p>Under the Approved Process, a proponent uses a PPC in order to propose the making of Procedure changes. This document draws out the specific changes required, impacts of proceeding and not proceeding. This is the beginning of the formal change process (Approved Process).</p> |
| Procedures | Means both the jurisdictional Retail Market Procedures and Technical Protocols. |
| Publish | The posting of information on the MIBB or the AEMO website. |
| RB | <p>Retail Business (or Users)</p> <p>For the Retail Markets that operate in SA, Queensland, and NSW and ACT the term 'User' is used. In Victoria, a Retail Business is termed a 'Retailer'.</p> |

| Term | Definition |
|--------------------|---|
| RMP | <p>Retail Market Procedures</p> <p>There is a RMP for each jurisdiction, which outlines the business and operating processes that each industry participant must adhere. The RMP receive their head of power in the NGR, where the ability for AEMO to make or amend the RMP is stated.</p> |
| SP | <p>Specification Pack</p> <p>This is a Technical Protocol that outlines the system and business process documents which must be used for the South Australian Retail Market transactions. The SP is given its head of power in the RMP, and includes the ICD.</p> |
| Technical Protocol | <p>Technical Protocol</p> <p>Technical Protocols are the various standards used to define how communications are handled at various levels. There are usually several protocols that might be used at each layer or sub-layer.</p> |
| XML | eXtensible Mark-up Language |

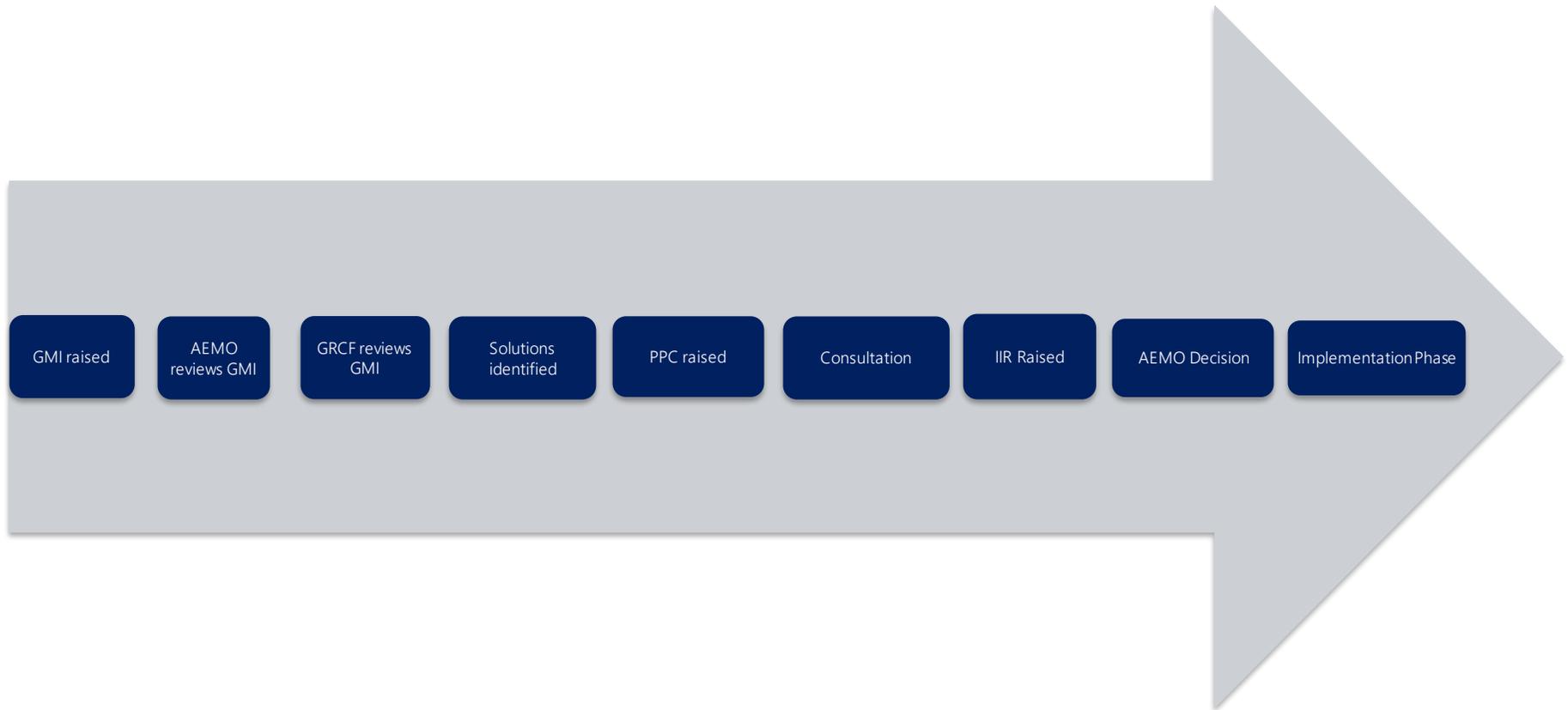
APPENDIX B. LIST OF GAS RETAIL MARKET ARTEFACTS

The following list details the responsibility for changes to the Procedures managed under the Approved Process. It is current at the time of this document's publication. For the avoidance of doubt, this list excludes gas retail market guidelines, which are not bound by the Approved Process and are therefore not bound by this change process.

1. Retail Market Procedures (Victoria)
2. Retail Market Procedures (South Australia)
3. Retail Market Procedures (Queensland)
4. Retail Market Procedures (NSW and ACT)
5. Gas Interface Protocol (Victoria)
6. Queensland Gas Interface Protocol
7. Gas Interface Protocol (NSW/ACT)
8. Participant Build Pack 1 - CSV Data Format Specifications
9. Participant Build Pack 1 - Process Flow Diagrams
10. Participant Build Pack 1 - Process Flow Table of Transactions
11. Participant Build Pack 2 - Glossary
12. Participant Build Pack 2 - Interface Definitions
13. Participant Build Pack 2 - Usage Guide
14. Participant Build Pack 3 - System Architecture
15. Participant Build Pack 3 - System Interface Definitions
16. Participant Build Pack 3 - System Specification
17. Participant Build Pack 4 - Queensland Specific Build Pack
18. Participant Build Pack 5 - NSW/ACT specific Participant Build Pack
19. Participant Build Pack 6 - NSW/ACT WWT specific Participant Build Pack
20. Consumed Energy Scenario (Victoria)
21. Consumed Energy Scenario (Queensland)
22. Gas FRC B2B Connectivity Testing and System Certification
23. Notice under rule 301B and 301C of the Retail Market Procedures (SA)
24. Specification Pack Usage Guidelines
25. SAWA Interface Control Document
26. Readiness Criteria
27. FRC CSV File Format
28. FRC B2M-B2B Hub System Specifications
29. FRC B2M-B2B Hub System Architecture
30. FRC B2B System Interface Definitions
31. Connectivity Testing Technical Certification

32. B2B Service Order Specifications
33. Operating Procedure NSW-ACT Gas Industry Protocol for identifying current Retailer
34. Privacy policy for customer information for NSW ACT Lost Gas Customers

APPENDIX C. LIFE CYCLE OF AN ISSUE



Note: For the avoidance of doubt, a PPC can be generated without having to raise a GMI first. If this occurs then the process set out in section 3.1 (Pre-Regulatory Process) will not apply.

APPENDIX D. APPROVED PROCESS FLOW DIAGRAM

