PROCEDURE CHANGE REQUEST WA (PCR-WA) – SUMMARY SECTION			

Procedure Change Number	**IN005/18W**		
Impacted jurisdiction(s)	Western Australia		
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Date proposal (GMI) sent to AEMO	21 June 2018		
Date PCR issued/received	17 August 2018		
Short Title	Notification of Error or Inaccuracy by Previous User.		
Other key contact information	pccwa@aemo.com.au		

PROCEDURE CHANGE REQUEST WA (PCR - WA) – DETAILED REPORT SECTION

1.	Description of change(s) and reasons for change(s)	**Reasons why the proposed changes are needed**: Clause 32 of the Retail Market Procedures (RMP) (WA) outlines the process to follow when a current user becomes aware of an error or inaccuracy in standing data because of the current user lodging an incorrect transfer request with AEMO or the network operator having lodged an incorrect delivery point transaction with AEMO. However, recent market activity has shown that in a significant number of cases, it is the previous user who first becomes aware of the error, usually because of the incorrect customer being transferred by the current user. The informal process that usually follows is the previous user contacts the current user to inform them of the possible error. Investigations by the current user are known to be slow and it can often be a month or more before the current user notifies the previous user of the outcome. This can have a significant impact on the customer, who is often left confused as to which user they are currently being supplied by and may result in the customer receiving bills from a user they have not entered into a contract with. **Description of the proposed changes**: Amend clause 32 of the procedures so that the current user is required to follow a formal process in the event a previous user notifies that there may be a transfer error. AEMO also proposes amending the clause 32 to include a time limit along with the requirement to complete the task as soon as practicable.
2.	Reference documentation ▪ Retail Market Procedures (the "Procedures"); ▪ AEMO Business/Information Specification Pack Reference; and/or ▪ Other Reference	Retail Market Procedures (WA) version 4.0
3.	The high level details of the change to the existing Procedures This includes: ▪ A comparison of the existing operation of the Procedures to the proposed change to the operation of the Procedures.	Add a subclause 32(1)(c) which requires the current user to investigate and notify the outcome of a transfer error that was notified by the previous user. Amend clause 32(1) and 32(2) to include a time limit of 10 business days along with the requirement to complete a task as soon as practicable.

	▪ A marked up version of the proposed Procedure change (see Attachment A).	
4.	Consequences for making or not making the change(s)	Not making the change will mean that participants will continue to use the current informal process, which often means a transfer error is only resolved after a lengthy period, having significant impact on the customer.
5.	Explanation regarding the order of magnitude of the change(s) (e.g. material, non-material or non-substantial)	This initiative will require minor RMP changes. AEMO considers the order of magnitude of this change is 'non-material'
6.	Likely benefits for industry as a whole	Introduction of a formal process and time limit will ensure that potential transfer errors are investigated and resolved in a timely manner.
7.	The likely implementation effect of the proposal Procedure change(s) on Industry in general and/or any identified parties (e.g. end-users)	The users will need to implement a process to investigate and notify the outcome of a transfer error.
8.	Testing requirements	Not applicable
9.	Supporting documentation (attach if necessary)	A marked-up version of clause 32 with proposed new sub clause is included in Attachment A.
10.	If applicable, a proposed effective date for the proposed Procedure change(s) to take effect and justification for that timeline.	Subject to all necessary approval's AEMO is targeting to implement this initiative in late January 2019. To achieve this AEMO proposes the following timeline. • Issue PCR 20 August 2018. • Submission on PCR close 21 September 2018. • Issue IIR 5 October 2018. • Submission on IIR 26 October 2018. • AEMO decision on whether to submit the change to ERA mid November 2018. • Target effective date late January 2019.

All amendments to the Procedure are change marked, where underlining (blue) represents an addition, and strike (red) through represents a deletion.

32. Error correction notice

(1) If a *current user* becomes aware of an error or inaccuracy in an item of the *AEMO standing data* as the result of:

    (a) lodging an incorrect *transfer request* with *AEMO,* then the *current user* must as soon as practicable and in any event within 10 *business days* notify the *previous user* of this fact. If the *current user* does not know the identity of the *previous user* then:

        (i) the *current user* must as soon as practicable and in any event within 10 *business days* notify AEMO and request *AEMO* to *notify* it of the identity of the *previous user*. The *current user's* request must include the following details:

            A. the *MIRN* for the relevant *delivery point*;

            B. the *GBO identification* of the person lodging the notice;

            C. the date the *transfer request* was completed (being the *transfer day* on which the *transfer* was purported to have occurred).

        (ii) within one *business day* of receiving a *notice* under clause 32(1)(a)(i) *AEMO* must confirm that:

            D. the person lodging the notice is the *current user*;

            E. the *delivery point* exists within the *AEMO Registry*; and

            F. a *transfer* was completed on the day referred to in the *notice*; and

        (iii) if *AEMO* is able to confirm these matters, *notify* the *current user* of the identity of the *previous user*; or

        if *AEMO* is not able to confirm the matters in clause 32(1)(a)(ii), then within one *business day* of receiving a *notice* under clause 32(1)(a)(i) *AEMO* must notify the *current user*.

        (iv) As soon as practicable after receiving a *notice* under clause 32(1)(a)(ii), the *current user* must *notify* the *previous user* that it has become aware of an error or inaccuracy in an item of *AEMO standing data* as a result of lodging an incorrect *transfer request*;

    (b) the *network operator* having lodged an incorrect *delivery point transaction* with *AEMO* in respect of *new connection confirmation notice* or *permanent removal*

confirmation notice — the *current user* must as soon as practicable <ins>and in any event within 10 *business days*</ins> *notify* the *network operator* of this fact.

(c) <ins>the *previous user* notifying the *current user* of the error or inaccuracy, then the *current user* must investigate the error or inaccuracy and notify the *previous user* of the outcome as soon as practicable and in any event within 10 *business days*.</ins>

(2) If a *previous user* is notified under clause 32(1)(a) <ins>or clause 32(1)(c)</ins> it may as soon as practicable <ins>and in any event within 10 *business days*</ins> lodge an *error correction notice* for the *delivery point* with *AEMO*.