

# AEMO WA COMPLIANCE QUARTERLY REPORT: WA GAS RETAIL MARKET PROCEDURES

PREPARED BY: Markets

VERSION: 1.0

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## Introduction

### Role of AEMO

Chapter 6 of the WA Retail Market Procedures (“Procedures”) deals with Compliance and Interpretation and places a number of obligations on AEMO. AEMO’s role under Chapter 6 of the Procedures are primarily to:

- create a Compliance Panel and support that panel<sup>1</sup>; and
- make determinations on whether to refer Procedure compliance and interpretation matters to the Compliance Panel.

The Compliance Panel makes all decisions under Chapter 6, except that it has delegated authority to AEMO make determinations on whether a Procedure breach is material<sup>2</sup>.

### Purpose

This report includes all the immaterial breaches identified in the last quarter, i.e. between January and March 2018. There was no breach referred to the Economic Regulation Authority (“ERA”) or had material impact on any other market participants, the market as a whole, or end use customers<sup>3</sup>.

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<sup>1</sup> The Compliance Panel has established the “WA Gas Retail Market Compliance Panel Guidelines” to set out its governance and administrative arrangements, as required by clause 338 of the Procedures. The WA Gas Retail Market Compliance Panel Guidelines are available on the AEMO website ([www.aemo.com.au](http://www.aemo.com.au)), and should be read in conjunction with the WA Gas Retail Market Compliance Guidelines (AEMO).

<sup>2</sup> Clause 343(3) of the Procedures.

<sup>3</sup> Any breaches that were referred to the Economic Regulation Authority (“ERA”) or had material impact on any other market participants, the market as a whole, or end use customers are reported separately and are included as a line item in this report for completeness.

## Quarterly Report – Immaterial Breaches

Date of breach	AEMO/Market Participant	Procedures clause	Summary	Decision
21/11/2017	AGL Sales Pty Ltd	Clause 178(b) of the WA Retail Market Procedures (RMP)	<p><u>Description</u></p> <p>On 21/11/2017, AGL Sales Pty Ltd (AGL) arranged for a customer transfer for a site in the Geraldton area. On 22/11/2017, AGL was alerted by AEMO that they were responsible for a customer on the Geraldton sub-network where AGL was unable to procure injections to meet the customer's withdrawals. AGL commenced investigations and could not identify the MIRN in question and requested AEMO to provide the MIRN details. Once the MIRN was identified, AGL was able to investigate and understand the cause of the problem.</p> <p>AGL investigated the issue, engaged with the other participants and arranged for an error correction to reverse the customer transfer returning the site to the previous Retailer.</p> <p>AGL understands the customer has two properties (Geraldton and Nedlands) and provided the MIRN for the Geraldton property at the same time as the Nedlands property. The AGL Sales Agent allocated the MIRN of the Geraldton property to the Nedlands property, which is in the AGL sales area for this period. AGL does not have access to a full MIRN listing for the WA Gas Retail Market and the AGL Sales Agent did not undertake a MIRN discovery as a MIRN was provided. AGL then submitted a customer transfer request for the MIRN provided by the customer to the market. AGL had implemented a block on transferring MIRNs located within the Geraldton postcode in their system. However, this MIRN was not associated with the Geraldton postcode and so the AGL system did not block the transfer.</p>	<p>Immaterial</p> <p>On 06/03/2018, AEMO requested participants to provide their feedback on this breach by 20/03/2018.</p> <p>AEMO received feedback from Alinta Energy (Alinta) and Kleenheat:</p> <ul style="list-style-type: none"> <li>Alinta noted the lengthy delay in resolving the transfer error and urges AGL to ensure further transfer errors are resolved in a timelier manner. Alinta also noted that the GMI to implement the Complete MIRN Listing for the WA Gas Retail Market is yet to be discussed in detail by the Procedure Change Committee and therefore Retailers should ensure that current processes are in place such that they can comply with the WA RMP.</li> <li>Kleenheat noted the time taken AGL to resolve the issue seems unreasonably long. Kleenheat also commented that the Complete MIRN Listing is currently unavailable to Retailers in the WA Gas Retail Market and in its absence, transfer errors can be avoided by MIRN Discovery. AGL's procedures should be updated to adapt to the WA Gas Retail Market which the absence of the Complete MIRN Listing to avoid such occurrence in the future.</li> </ul> <p>After having regard to the other matters in clause 329(1) of the WA RMP, AEMO has determined that the breach was not material and resolved. AEMO to take no further action in relation to this matter.</p>

		<p>This appears to be a breach of clause 178(b) of the WA RMP by AGL.</p> <p>There has been some minimal impact to the Pipeline Operators and the previous Retailer as a result of identifying the transfer error. However, these minor issues should have been resolved when the error correction was processed.</p> <p><u>Cause</u> This incident was due to AGL transferred a customer in the Geraldton sub-network where AGL was unable to procure injections to meet the customer's withdrawals.</p> <p><u>Actions</u> Once the transfer error had been identified, AGL started taking steps to reverse the error. In December 2017, AGL has engaged multiple participants to determine the previous FRO of the site. On 02/01/2018, ATCO advised AGL the previous FRO of the site. AGL then notified the previous FRO of the site to implement an error correction to return the site to them. On 10/02/2018, the previous FRO of the site responded to AGL and an error correction was raised on the day to return the site to them. The error correction completed on 13/02/2018 and the site returned to the previous FRO effective 21/11/2017. AGL contacted the customer informing them that the site has been returned to the previous Retailer.</p> <p>AGL has submitted a Gas Market Issue (GMI) to implement the full MIRN Listing for the WA Gas Retail Market.</p> <p>Feedback has been provided to the AGL's operational teams and AGL will reinforce the use of MIRN Discovery. AGL also noted that the delays in resolving the transfer error should be substantially</p>	
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			<p>reduced when the WA Gas Retail Market implements the change in winning/losing Retailer being shown in the transfer request transaction.</p>	
<p>11/01/2018</p>	<p>AEMO</p>	<p>Clause 98(d) and 100(2)(d) of the WA Retail Market Procedures (RMP)</p>	<p><u>Description</u>                  On 11/01/2018, 527 Transfer Confirmation Notification (TFR-CONF-NOTIF) transactions breached the transaction acknowledgement time of 270 minutes for medium priority transactions by 25 minutes.</p> <p>This caused a non-compliance with the WA RMP relating to immediately notifying the relevant parties of a pending transfer request.</p> <p>The definition of ‘immediately’ references clause 11(1) of the WA RMP. Clause 11(1)(a) of the WA RMP references section 2.5.5 of the “FRC B2M-B2B Hub System Specifications” which specifies that all medium priority transactions shall be acknowledged within 270 minutes.</p> <p><u>Cause</u>                  This incident was due to the database connection pool used by the application that processes AseXML transactions became exhausted as a result of a large number of incoming messages being allocated connections from the database connection pool. This prevented the allocation of the database connections to the processing of the outgoing messages.</p> <p><u>Actions</u>                  AEMO increased the database connection pool count and restarted the application and services. Incoming and outgoing transactions were processed normally after the restart.</p> <p>AEMO investigated the cause of the exhaustion of the database connection pool and implemented a number of changes to the configuration of the gateway application and database to address the connection exhaustion issues. AEMO will monitor</p>	<p>Immaterial</p> <p>On 23/01/2018, AEMO requested participants to provide their feedback on this breach by 06/02/2018. AGL and Agora Retail confirmed that there was no impact.</p> <p>After having regard to the other matters in clause 329(1) of the WA RMP, AEMO has determined that the breach was not material and resolved. AEMO to take no further action in relation to this matter.</p>

			<p>the performance of the gateway application and database.</p>	
<p>20/01/2018</p>	<p>Alinta Energy</p>	<p>Clause 197(2) of the WA Retail Market Procedures (RMP)</p>	<p><u>Description</u>                  On Saturday 20/01/2018, Alinta Energy (Alinta) had technical issues with its server which prevented it from making submissions in the usual manner. As a result, user's pipeline nomination amount (UPNA) for the Parmelia pipeline and the Dampier Bunbury Pipeline (DBP) for gas day 21/01/2018 were submitted late by approximately one hour.</p> <p>This appears to be a breach of clause 197(2) of the WA RMP relating to notifying AEMO of the UPNA for each gas day for each gate point at least 18 hours before the start of the gas day.</p> <p><u>Cause</u>                  This incident was due to Alinta's technical issues with its server which prevented it from making submission in the usual manner.</p> <p><u>Actions</u>                  Alinta contacted AEMO and AEMO Support Hub could not direct Alinta to the appropriate team for out of business hours WA Gas Retail Market systems IT support. Alinta forwarded the manual submissions to AEMO at 2.12pm (WST). At 2.57pm (WST), Alinta's systems were back online and submitted the UPNA files. Alinta received acknowledgements from AEMO for the UPNA files.</p> <p>Alinta is going to:</p> <ul style="list-style-type: none"> <li>• consider options for making future submissions in the event of an internal server outage; and</li> <li>• seek AEMO contact details for out of business hours support in the event that files need to be submitted manually.</li> </ul> <p>AEMO sent an email to the participants regarding to the support AEMO provides to the participants in the</p>	<p>Immaterial</p> <p>On 29/01/2018, AEMO requested participants to provide their feedback on this breach by 12/02/2018. AGL and Agora Retail confirmed that there was no impact.</p> <p>After having regard to the other matters in clause 329(1) of the WA RMP, AEMO has determined that the breach was not material and resolved. AEMO to take no further action in relation to this matter.</p>

<p>20/02/2018</p>	<p>ATCO</p>	<p>Clause 158(1)(c) of the WA Retail Market Procedures (RMP)</p>	<p>WA Gas Retail Market on 01/03/2018.</p> <p><u>Description</u>                  On 20/02/2018, ATCO failed to provide the interval meter reading (INTMR) data to AEMO by 11:30am WST.</p> <p>On 19/02/2018, ATCO completed a change to the meter set configuration at the site location of the end-use industrial customer. The reconfiguration resulted in a reduction in the number of operating meters. The change was effected in ATCO's metering data system on 19/02/2018, whereby the deactivated operating meter's status was set to 'inactive'. On 20/02/2018, ATCO validated the INTMR data for all industrial customers and began the file transmission process to AEMO at approximately 11:00am WST. However the process was unsuccessful on three consecutive attempts. The issue was escalated internally and urgent investigations revealed the metering data system was unable to create an energy record for the recently deactivated operating meter, thereby causing the INTMR data file transmission to fail. As a workaround, the status of the deactivated meter was set to 'active' and the INTMR data file was successfully transmitted to AEMO at approximately 11:45am WST which was 15 minutes later than the requirement outlined in clause 158(1)(c) of the WA RMP.</p> <p>This appears to be a breach of clause 158(1)(c) of the WA RMP by ATCO.</p> <p>The meter set configuration issue is isolated to the one customer site and ATCO has not been made aware of any impact on the participants.</p> <p><u>Cause</u>                  This incident was due to a failure of ATCO's metering data system in processing a meter set change on a multi-MIRN industrial customer site</p>	<p>Immaterial</p> <p>On 14/03/2018, AEMO requested participants to provide their feedback on this breach by 28/03/2018.</p> <p>AGL confirmed that there was no impact on their operations.</p> <p>After having regard to the other matters in clause 329(1) of the WA RMP, AEMO has determined that the breach was not material and resolved. AEMO to take no further action in relation to this matter.</p>
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