

IMPACT IMPLEMENTATION REPORT (IIR)

Issue Number	IN009/18.		
Impacted Jurisdiction(s)	Queensland (QLD), South Australia (SA) and New South Wales / Australia Capital Territory (NSW/ACT)		
Proponent	Danny McGowan and Roger Shaw	Company	AEMO
Affected Gas Market(s)	Retail	Consultation process (Ordinary or Expedited)	Ordinary
Industry Consultative forum(s) used	GRCF	Date Industry Consultative forum(s) consultation concluded	Friday, 29 March 2019
Short Description of change(s)	Proposed transitional provisions for the jurisdictional Retail Market Procedures (RMP) in light of the National Gas Rules (NGR) change to harmonise the gas day		
Procedure(s) or Documentation impacted	Retail Market Procedures (Queensland) (ver 16). Retail Market Procedures (NSW and ACT) (ver 19). Retail Market Procedures (South Australia) (ver 13).		
Summary of the change(s)	The change described in this Impact and Implementation Report (IIR) involve adding transitional provisions to the RMP. These transitional provisions will provide regulatory relief for Participants for the shorter gas day. Further, the proposed changes provide further transparency on the New Operators transition plans in terms of how they will treat the interval metering data for this shorter day.		
I&IR Prepared By	Danny McGowan	Approved By	Michelle Norris
Date I&IR published	12 April 2019	Date Consultation under 135EE or 135EF concludes	15 May 2019
Email Address for Responses	grcf@aemo.com.au		
Other key contact information			



IMPACT & IMPLEMENTATION REPORT

CRITICAL EXAMINATION OF PROPOSAL

1. DESCRIPTION OF CHANGE AND REASONS FOR CHANGE

In early 2017 the AEMC published a rule determination to harmonise the start time of the gas day used in the short-term trading market hubs and the gas supply hub trading locations with the gas day start time used in the Victorian declared wholesale gas market. Under the rule, the gas day in each market at each location will commence at 6.00 am Australian Eastern Standard Time (AEST). In late 2017 the COAG Energy Council considered a range of reform recommendations put forward by Gas Market Reform Group (GMRG) which include introducing the standard gas day harmonising the start time of the gas day at 6:00am AEST. Click [here](#) to view the GMRG final recommendation paper. At the November 2017 COAG Energy Council meeting, Ministers agreed with the full package of reforms put forward by GMRG which included a recommendation that harmonising the start time of the gas day changes take effect from 6am AEST on 1 October 2019. Changes to the National Gas Law (NGL) and National Gas Rules (NGR) were made by the SA Minister for Energy on 22 November 2018. Click [here](#) to view these amendments.

In late 2018, AEMO commenced a three-staged program of work to review the impact of harmonising the start time of the gas day initiative. The first stage of the review included what (if any) wholesale and retail market changes were required. The outcome of the review, including AEMO final decision on the proposed changes, can be viewed [here](#).

The second stage of the review included developing a Transition Plan that described the activities that AEMO and Market Participants would be required to perform to facilitate a successful and smooth transition to the harmonised gas day. The final Transition Plan was published on the AEMO website by 1 April 2019. Click [here](#) to view the Plan

AEMO recently commenced the third stage of the program which involved considering what transitional provisions will be required for the retail market to underpin a successful and smooth transition. This review revealed that transitional provisions to the Retail Market Procedures (RMP) will be required. Two key factors necessitating the need for transitional provisions are:

- (i) The requirement to provide regulatory relief for Participants for the shorter gas day that occurs on the 30 September 2019.
- (ii) Further transparency on the New Operators and Pipeline Operator transition plans in terms of how they will treat the interval metering data for the shorter gas day and the current gas day if they have re-configured interval meters to the standard gas day.

In early March, AEMO issued a Proposed Procedure Change (PPC) that detailed the changes to the RMP and invited submissions. Section 9 details the outcome of the PPC consultation.

A summary of the recommended RMP changes are described in Section 3 of this IIR.

Anyone wishing to make a submission for this second stage consultation are to use the response template provided in Attachment E. Submissions close 15 May 2019 and should be emailed to gdh@aemo.com.au.

2. REFERENCE DOCUMENTATION

The following documents are referenced in this IIR:

- Retail Market Procedures (Queensland) (ver 16).
- Retail Market Procedures (NSW and ACT) (ver 19).
- Retail Market Procedures (South Australia) (ver 13).



- Gas Day Harmonisation - Transition Plan (Final) (effective 1 April 2019).

3. HIGH LEVEL OVERVIEW OF THE CHANGES TO EXISTING PROCEDURES

The following provides an overview of the Retail Market changes:

- Retail Market Procedures (South Australia):
 - Add a new Chapter (Chapter 12) that describes the transitional provisions that support the broader AEMO, Network Operator and Pipeline Operator's transition plans for gas day harmonisation.
 - Add a note to the *Gas Day* definition in clause that references the new Chapter 12B provisions.
- Retail Market Procedures (Queensland):
 - Add a new Chapter (Chapter 12) that describes the transitional provisions that support the broader AEMO and Distributor's transition plans for gas day harmonisation.
 - Add a note to the *Gas Day* definition in clause 1.1.1 that references the new Chapter 12 provisions.
- Retail Market Procedures (NSW and ACT):
 - Add a new Chapter (Chapter 12B) that describes the transitional provisions that support the broader AEMO and Distributor's transition plans for gas day harmonisation.
 - Add a note to the *Gas Day* definition in clause 1.2.1 that references the new Chapter 12B provisions.

Attachments A to C provide the full details of the proposed changes to the RMPs.

4. ORDER OF MAGNITUDE OF THE CHANGE PROPOSED

AEMO's assessment in terms of the order of magnitude to implement a harmonised gas day is that this change will be 'material'. This is because the changes involve Distributors and Pipeline Operators making modifications to "onsite" meter reading equipment. Remote and manual adjustments will be required depending on the type of metering on sites. Detailed transition plans will also need to be developed by Network and Pipeline Operators by 30 June 2019.

The materiality of the changes to Retail Market IT systems and processes for AEMO and presumably, the Retailers, Distributors and Pipeline Operators are less complex compared to the broader changes. AEMO is of the view these changes should be uncomplicated configurational IT changes, meaning that the order of magnitude from an IT system is 'non-material'.

ASSESSMENT OF LIKELY EFFECT OF PROPOSAL

5. OVERALL INDUSTRY COST / BENEFIT (TANGIBLE / INTANGIBLE / RISK) ANALYSIS AND COST ESTIMATES

Given that the proposed change is a legislative requirement, a cost estimate is not warranted in this instance.

In terms of benefits, having a consistent gas day start time across all jurisdiction that operate under the NGR will enable new participants to partake in these markets more easily. The changes proposed will ensure that the three jurisdictional RMPs are aligned with the new legislative framework and, where possible, with each other. This provides consistency and harmonisation with both the new legislative framework and other jurisdictional gas markets.



6. THE LIKELY IMPLEMENTATION EFFECT OF THE CHANGE ON STAKEHOLDERS

As noted under section 4 of this IIR, AEMO, Retailers, Distributors and Pipeline Operators will be impacted by these changes. When implemented, the benefits outlined in section 5 of the IIR should be realised.

7. TESTING REQUIREMENTS

AEMO and presumably, Retailers, Distributors and Pipeline Operators will be required to modify their IT systems to comply with the harmonised gas day. AEMO's view is these IT system changes do not require either a co-ordinated industry testing program, or a bilateral testing program.

AEMO and Participants that make Retail Market IT system changes should assess whether they need to recertify their systems. Click [here](#) for further details about maintaining and achieving technical certification for QLD and NSW, otherwise click [here](#) for further details on SA.

8. AEMO'S PRELIMINARY ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH SECTION 135EB:

Consistency with the NGL and NGR

AEMO's view is that the proposed change is consistent with the NGL and NGR. The proposed change promotes consistency across four jurisdictions.

National Gas Objective

"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."

It is AEMO's view that the proposed changes described in this IIR removes any costs associated with unnecessary differences in processes and procedures and is in the long-term interests of consumers as it promotes clarity and consistency.

Applicable Access Arrangements

AEMO's view is that the proposed changes in this IIR are not in conflict with existing Access Arrangements. No Distributor raised any concerns with the proposed amendments in relation to their Access Arrangement during the first round of consultation.

9. CONSULTATION FORUM OUTCOMES

On 18 March 2019 AEMO published on its website a PPC that proposed changes to the RMPs. The proposed changes involved adding transitional provision to the RMPs to aid the smooth transition to the new gas day start time arrangements. Registered participants and interested stakeholders were invited to make submissions which closed on 29 March 2019.

Submissions were received from AGL, Energy Australia, Origin Energy and APA (for AGN and Allgas) and all of these responses supported the implementation of this change.

Origin Energy also submitted a response which noted a concern pertaining to the scope of testing. Origin Energy's feedback proposed that an end to end (E2E) testing program should be undertaken. AEMO has considered this proposal and because there are no fundamental changes to transition formats of processes to market operations, AEMO does not support Origin Energy's proposal. See Attachment D for further information.



APA (for AGN and Allgas) and Origin Energy also proposed additional changes and a summary on of these changes and AEMO's response to each proposal is contained in Attachment D.

RECOMMENDATION

10. SHOULD THE PROPOSED PROCEDURES BE MADE, (WITH OR WITHOUT AMENDMENTS)?

AEMO recommends the changes proposed in Attachments A, B and C.

11. PROPOSED EFFECTIVE DATE FOR THE PROPOSED CHANGE TO TAKE EFFECT.

Subject to all necessary approvals, AEMO is targeting to implement this initiative on Friday 28 June 2019. In order to achieve this timeline, AEMO proposes the following key milestones:

- Issue IIR on 12 April 2019.
- Submissions on IIR close 15 May 2019.
- AEMO decision on 29 May 2019.
- Effective date Friday 28 June 2019.



ATTACHMENT A – DOCUMENTATION CHANGES (SEE SECTION 3)

Blue underline represents additions **Red** and ~~strikeout~~ represents deletions – Marked up changes

Grey shared represents the changes between PPC and IIR stage.

- Retail Market Procedures (South Australia)

Extract from clause 2.

“gas day” means the 24 hour period starting at 0600 hours on a day and ending at 0600 hours on the following day.

[Note: The meaning of the term “gas day” for 30 September 2019 is described in clause 419]

New Chapter.

CHAPTER 12 - TRANSITIONAL PROVISIONS

419. Gas Day Harmonisation

(a) In relation to clause 2:

- (i) the “gas day” for 30 September 2019 gas day is the 23.5 hour period starting at 0600 hours ACST (0630 hours AEST) on 30 September 2019 and ending at 0530 hours ACST (0600 hours AEST) on 1 October 2019.
- (ii) the “interval-meter demand profile” provided under clause 202(1) for the 30 September 2019 gas day must comprise 24 numbers which sum to 1 and are the user’s estimate, for each hour in the gas day, of the proportion of its forecast interval-metered withdrawals which will be withdrawn during the hour provided that the last hour of the 30 September 2019 gas day will be the user’s estimate of the proportion of its forecast interval-metered withdrawals for the period from 5:30am to 6:00am AEST.
- (iii) “interval meter” means a meter which: (a) is read by means of telemetry; and (b) aggregates the flow of gas across time, and records that flow for each hour provided that for the 30 September 2019 gas day the meter will record flow for the period from 5:30am to 6:00am AEST instead of the period from 5:30am to 6:30am.
- (iv) “meter reading data” means the data actually obtained by reading a meter physically or by telemetry, and includes: (a) for a basic meter — the index reading; and (b) for an interval meter — the corrected volume of gas delivered in each hour (provided that the last hour of the 30 September 2019 gas day will only be for the period from 5:30am to 6:00am AEST), and such other data as is required for verification by a network operator or provided by the meter in normal circumstances. {Note: The data obtained from different types of interval meter varies.}



- (v) “Standard gas day” means the standard gas day as defined in Part 26 of the National Gas Rules.
- (b) In relation to the last hour of the 30 September 2019 gas day, a reference in these Procedures to “each hour” in a gas day will be taken to mean the period from 5:30am to 6:00am AEST instead of the period from 5:30am to 6:30am AEST.
- (c) For the purpose of clause 160(2) and 162 of these Procedures, for each occasion on which these Procedures require a network operator to provide a current user or AEMO with metering data for an interval-metered delivery point, the network operator must provide an energy value that is an estimated value:
 - (i) For a gas day commencing before the end of the Part 26 transition period - if an interval meter has been reconfigured to aggregate and record flow for each hour of the standard gas day, estimated using hourly metering data aggregated and recorded for each hour of the standard gas day, and
 - (ii) For a gas day commencing on or after the Part 26 transition date - if an interval meter has not been reconfigured to aggregate and record flow for each hour of the standard gas day, estimated using hourly metering data aggregated and recorded for each hour of the gas day in use at the interval meter on that gas day .

[Note: The estimated value will not be determined under clause 156(2) of these Procedures using an estimation methodology set out (a) in sections 2.2.3 and 2.2.4 of Appendix 2]

[Note: The estimated value may be determined under clause 156(2) of these Procedures using an estimation methodology set out (a) in sections 2.2.3 and 2.2.4 of Appendix 2 or an alternate estimation methodology as described in the Network Operators transition plan].

- (d) Network operators and pipeline operators must include the following information in their transition arrangements under schedule 5, part 6, rule 4 of the National Gas Rules:

<p><u>Meter reconfiguration scenarios</u></p>	<ul style="list-style-type: none"> • <u>Interval meters or physical gate point that have not been reconfigured to measure and record for a standard gas day.</u> • <u>Interval meters or physical gate point that have been reconfigured to measure and record for a standard gas day.</u> <p><u>[Note: Before the Part 26 transition date, interval meters that have been reconfigured to measure and record for a standard gas day or for each hour or other interval based on a standard gas day will still be required to provide metering data under these Procedures for each hour of a gas day that is not a standard gas day (being the 24 hour period starting at 0600 hours ACST (0630 hours AEST) on 30 September 2019 and ending at 0600 hours ACST (0630 hours AEST)]</u></p>
<p><u>Meter readings</u></p>	<p><u>For each of the meter reconfiguration scenarios above, a description of how the network operator and pipeline operator will obtain a meter reading or physical gate point metering data for interval meters or physical gate points prior to the 30 September gas day, for the 30 September 2019 gas day and the 1 October 2019 and subsequent gas days</u></p>



<p><u>Estimated meter readings</u></p>	<p>For each of the meter reconfiguration scenarios above, a description of how the <i>network operator</i> and <i>pipeline operator</i> will determine an <i>estimated value</i> if a <i>meter reading</i> or <i>physical gate point metering data</i> is unable to be obtained for <i>interval meters</i> or <i>physical gate point</i> prior to the 30 September <i>gas day</i>, for the 30 September 2019 <i>gas day</i> and the 1 October 2019 and subsequent <i>gas days</i></p> <p>[Note: An estimated value can be required where a <i>meter reading</i> or <i>physical gate point metering data</i> cannot be obtained or where the meter has been reconfigured]</p>
<p><u>Hourly metering data</u></p>	<p>For each of the meter reconfiguration scenarios above, a description of how the <i>network operator</i> and <i>pipeline operator</i> will ensure that metering data or <i>physical gate point metering data</i> is provided for the last hourly interval for <i>gas day</i> 30 September 2019 will only include data for the period from 5:30am to 6:00am AEST.</p>
<p><u>Reporting</u></p>	<p>A description of the regular reporting that will be published by the <i>network operator</i> and <i>pipeline operator</i> and provided to AEMO by the <i>network operator</i> and <i>pipeline operator</i> of the scheduling, progress and completion of <i>interval meter</i> and <i>physical gate point</i> reconfigurations which must include:</p> <ul style="list-style-type: none"> • <u>the dates or periods during which <i>meters</i> are scheduled to be reconfigured to measure and record for a <i>standard gas day</i> and the date or period when reconfiguration was completed</u> • <u>reporting of scheduling and completion of <i>meter</i> reconfiguration should identify the <i>meters</i> by <i>MIRN</i> only</u> • <u>the method of completion of <i>meter</i> reconfiguration (e.g. service orders to be sent, impacts on <i>meter</i> data files)</u> • <u>Details of contingency plans to substitute metering data being measured prior to the reconfiguration of the <i>meter</i> with estimates after the <i>meter</i> has been reconfigured.</u> <p>[Note: Reporting information that is to be provided to AEMO is to be sent to the following e-mail address – gdh@aemo.com.au. Reporting information that AEMO receives will be published on AEMO’s Gas Day Harmonisation website page.]</p>



ATTACHMENT B – DOCUMENTATION CHANGES (SEE SECTION 3)

Blue underline represents additions **Red** and ~~strikeout~~ represents deletions – Marked up changes

- Retail Market Procedures (Queensland)

Extract from clause 1.1.1

gas day A period of 24 consecutive hours beginning at 8:00 am.

[Note: The meaning of the term “gas day” for 30 September 2019 is described in clause 12.1 (a) (i) .]

New Chapter.

CHAPTER 12 - TRANSITIONAL PROVISIONS

12. 1 Gas Day Harmonisation

(a) In relation to clause 1.1.1

- the term “gas day” for the 30 September 2019 is a period of 22 consecutive hours beginning at 8:00 am AEST.
- “Standard gas day” means the standard gas day as defined in Part 26 of the Rules.

(b) Distributor must include the following information in their transition arrangements under schedule 5, part 6, rule 4 of the Rules:

<p><u>Meter reconfiguration scenarios</u></p>	<ul style="list-style-type: none"> • <u>Interval meter or custody transfer meter that have not been reconfigured to measure and record for a standard gas day.</u> • <u>Interval meters or custody transfer meter that have been reconfigured to measure and record for a standard gas day.</u> <p>[<u>Note: Before the Part 26 transition date, interval meters or custody transfer meter that have been reconfigured to measure and record for a standard gas day or for each hour or other interval based on a standard gas day will still be required to provide metering data under these Procedures for each hour of a gas day that is not a standard gas day (being the 24 hour period starting at 0800 hours AEST) on 30 September 2019 and ending at 0800 hours AEST)]</u></p>
<p><u>Meter readings</u></p>	<p><u>For each of the meter reconfiguration scenarios above, a description of how the distributor will obtain a meter reading or custody transfer meter metering data for interval meters or custody transfer meter prior to the 30 September gas day, for the 30 September 2019 gas day and the 1 October 2019 and subsequent gas days.</u></p>



<p>Estimated meter readings</p>	<p>For each of the meter reconfiguration scenarios above, a description of how the distributor will determine an estimated meter reading if a meter reading or custody transfer meter metering data is unable to be obtained for interval meters or physical gate point prior to the 30 September gas day, for the 30 September 2019 gas day and the 1 October 2019 and subsequent gas days</p> <p>[Note: An estimated value can be required where a meter reading or physical gate point metering data cannot be obtained or where the meter has been reconfigured]</p>
<p>Reporting</p>	<p>A description of the regular reporting that will be published by the distributor and provided to AEMO by the distributor of the scheduling, progress and completion of interval meter and custody transfer meter reconfigurations which must include:</p> <ul style="list-style-type: none">the dates or periods during which meters are scheduled to be reconfigured to measure and record for a standard gas day and the date or period when reconfiguration was completedreporting of scheduling and completion of meter reconfiguration should identify the meters by MIRN onlythe method of completion of meter reconfiguration (e.g. service orders to be sent, impacts on meter data files)Details of contingency plans to substitute metering data being measured prior to the reconfiguration of the meter with estimates after the meter has been reconfigured. <p>[Note: Reporting information that is to be provided to AEMO is to be sent to the following e-mail address – gdh@aemo.com.au. Reporting information that AEMO receives will be published on AEMO's Gas Day Harmonisation website page.]</p>



ATTACHMENT C – DOCUMENTATION CHANGES (SEE SECTION 3)

Blue underline represents additions **Red** and ~~strikeout~~ represents deletions – Marked up changes

Grey shared represents the changes between PPC and IIR stage.

- Retail Market Procedures (NSW/ACT)

Extract from clause 1.2.1

gas day A period of 24 consecutive hours beginning at 6:30 am.

[Note: The meaning of the term “gas day” for 30 September 2019 is described in clause 12B.1 (a) (i)]

New Chapter.

CHAPTER 12B - TRANSITIONAL PROVISIONS

12B.1 Gas Day Harmonisation

(a) In relation to clause 1.2.1:

- the “gas day” for 30 September 2019 gas day is A period of 23.5 consecutive hours beginning at 06:30 AEST on 30 September 2019 and ending at 0600 AEST on 1 October 2019.
- “Standard gas day” means the standard gas day as defined in Part 26 of the rules.

(b) In relation to the last hour of the 30 September 2019 gas day, a reference in these Procedures to “each hour” in a gas day will be taken to mean the period from 5:30am to 6:00am AEST instead of the period from 5:30am to 6:30am AEST.

(c) For the purpose of clause 3.1.6 (b) of these Procedures, for each occasion on which these Procedures require a network operator to obtain hourly volumes, the network operator provide an energy value that is an estimated value:

- For a gas day commencing before the end of the Part 26 transition period - if an interval meter has been reconfigured to aggregate and record flow for each hour of the standard gas day, estimated using hourly metering data aggregated and recorded for each hour of the standard gas day, and
- For a gas day commencing on or after the end of the Part 26 transition period - if an interval meter has not been reconfigured to aggregate and record flow for each hour of the standard gas day, estimated using hourly metering data aggregated and recorded for each hour of the gas day in use on that gas day.



[Note: The estimated hourly volumes will not be determined under clause 3.1.6 (b) of these Procedures using an estimation methodology set out attachment 2]

[Note: The estimated hourly volumes may be determined under clause 3.1.6 (b) of the Procedures using an estimated methodology set out in attachment 2 or an alternate estimation methodology as described in the Network Operators transition plan].

(d) Network operators must include the following information in their transition arrangements under schedule 5, part 6, rule 4 of the National Gas Rules:

<p><u>Meter reconfiguration scenarios</u></p>	<ul style="list-style-type: none"> <u>Interval meters, daily metered or network receipt points that have not been reconfigured to measure and record for a standard gas day.</u> <u>Interval meters, daily metered or network receipt points that have been reconfigured to measure and record for a standard gas day.</u> <p><u>[Note: Before the Part 26 transition date, interval meters, daily metered or network receipt points that have been reconfigured to measure and record for a standard gas day or for each hour or other interval based on a standard gas day will still be required to provide metering data under these Procedures for each hour of a gas day that is not a standard gas day (being the 24 hour period starting at 0630 hours AEST on 30 September 2019 and ending at 0630 hours AEST)]</u></p>
<p><u>Meter readings</u></p>	<p><u>For each of the meter reconfiguration scenarios above, a description of how the network operator will obtain a meter reading for interval meters, daily metered or network receipt points prior to the 30 September gas day, for the 30 September 2019 gas day and the 1 October 2019 and subsequent gas days</u></p>
<p><u>Estimated meter readings</u></p>	<p><u>For each of the meter reconfiguration scenarios above, a description of how the network operator will determine an estimated meter reading interval meters, daily metered or network receipt points prior to the 30 September gas day, for the 30 September 2019 gas day and the 1 October 2019 and subsequent gas days</u></p>
<p><u>Hourly metering data</u></p>	<p><u>For each of the meter reconfiguration scenarios where hourly data is obtained under clause 3.1.6 (b), a description of how the network operator will ensure that metering data is provided for the last hourly interval for gas day 30 September 2019 will only include data for the period from 5:30am to 6:00am AEST.</u></p>



Reporting

A description of the regular reporting that will be published by the *network operator* and provided to AEMO by the *network operator* of the scheduling, progress and completion of *interval meter* reconfigurations which must include:

- the dates or periods during which *meters* are scheduled to be reconfigured to measure and record for a *standard gas day* and the date or period when reconfiguration was completed
- reporting of scheduling and completion of *meter* reconfiguration should identify the *meters* by *MIRN* only
- the method of completion of *meter* reconfiguration (e.g. service orders to be sent, impacts on *meter* data files)
- Details of contingency plans to substitute metering data being measured prior to the reconfiguration of the *meter* with estimates after the *meter* has been reconfigured.

[Note: Reporting information that is to be provided to AEMO is to be sent to the following e-mail address – gdh@aemo.com.au. Reporting information that AEMO receives will be published on AEMO's Gas Day Harmonisation website page.]

ATTACHMENT D – SUBMISSIONS RECEIVED FOR CHANGE IN009/18.

General Comments on the Proposed Procedure Change

Ref#	Company	Topic	Please Provide Response Here	AEMO response
1	Origin	<p>Sections 1 to 10 of the PPC sets out details of the proposal. .</p> <p>Does your organisation supports AEMO' s assessment of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO's assessment (include PPC section reference number) of the proposal and include information that supports your organisation rational why you do not support AEMO's assessment.</p>	<p>With regards to the following sections: 5. Explanation Regarding The Order Of Magnitude of the Changes 8. Testing Requirements</p> <p>Origin agrees with AEMO's assessment that the OOM to implement a harmonized gas day change will be "material". As such Origin believes end to end industry testing involving Retailers, Distributors and Pipeline Operators must be coordinated by AEMO along with defined acceptance criteria for market participant readiness for GDH go-live. AEMO is best placed to lead the industry testing; co-ordinate resolution of industry testing issues in a timely manner; provide transparency of industry testing status and unresolved critical issues to market participants and assess industry readiness ahead of GDH go-live.</p>	<p>AEMO does not support Origin Energy's suggestion to run an end to end (E2E) testing. There are a couple of factors as to why AEMO believes that E2E testing isn't required.</p> <p>There are no fundamental changes to the format of the transactions and the operational interaction to market operations, and AEMO believes that retail gas markets are sufficiently flexible to allow market operations to continue even if some participants are not ready. There are already provisions for meter data to be either retrospectively adjusted or reconciled after the event.</p> <p>E2E testing is normally used where new transactions or fundamental process changes are being introduced, which is not the case with the gas day harmonisation</p>



				<p>program of work.</p> <p>AEMO also believes that the requirement on AEMO, Pipeline Operator and the Network Operators to provide detailed transition plans will provide the necessary transparency to mitigate the need for an E2E testing. Click here to view AEMO's Transition Plan. AEMO's Transition Plan requires AEMO to coordinate reporting on industry readiness (see section 2).</p>
2	EA		EnergyAustralia is supportive of the changes proposed to the Retail Market Procedures below.	AEMO notes Energy Australia's support.
3	APA/AGN/Allgas		Yes, but please see below regarding estimation methodology.	AEMO notes APA/AGN/Allgas support of AEMO's assessment of the proposal. See also item # 5.
4	AGL		<p>AGL believes that AEMO has generally reviewed the requirements appropriately.</p> <p>AGL notes that with the shift of all gas load from the current market time to the 6 am market start time, there are shifts in consumption profiles. Whilst this is not expected to be material in Sydney and Adelaide, the Brisbane shift from 8 am to 6 am is likely to impact different gas days</p>	<p>AEMO notes AGL belief that AEMO has reviewed the requirement appropriately.</p> <p>AEMO appreciates AGL's detailed assessment pertaining to the shift of gas load during the transition period. The point about the Queensland shift being more of an impact is certainly worth highlighting. AEMO will undertake</p>



			<p>(e.g. Sunday/Monday, Friday/Saturday) in different ways.</p> <p>AGL would like AEMO and the transmission pipeline operators to work with retailers to better understand what impact, if any, the Brisbane market start shift may have on various daily profiles.</p>	<p>AGLs suggestion to bring together retailers and transmission pipeline operators. We will raise this matter at the 9th April 2019 reference group meeting.</p>
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Feedback on the documentation changes described in Attachment A to C of the PPC.

Participants are to complete the relevant columns below in order to record their response.					
Attachment A - Retail Market Procedures (South Australia)					
Participant feedback for this procedure					
Ref #	Company	Clause #	Issue / Comment	Proposed text Red strikethrough means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
5	APA/AGN/Allgas	419 (c) (Note)	<p>Estimation methodology – the note specifically excludes use of existing estimation methods.</p> <p>The option to use existing methods for the estimation of interval meter data from sites that are being reconfigured either before or after the cutover date must be maintained.</p> <p>If any estimates are required for interval meters being reconfigured pre or post 30/9 in SA, APA plans to estimate as per existing methods, but will ensure that the estimated values are aligned to the appropriate gas day for the period, whether that be pre or post 30/9.</p> <p>It is not appropriate to impose a new estimation methodology on the Network</p>	<p>{Note: The estimated value will not be determined under clause 156(2) of these Procedures using an estimation methodology set out (a) in sections 2.2.3 and 2.2.4 of Appendix 2}</p>	<p>AEMO agrees with APA/AGN/Allgas point about maintaining the existing methods for estimation either side of the transition. AEMO does not support the idea that the note should be deleted. AEMO will amend the note to say:</p> <p><i>"The estimated value may be determined under clause 156(2) of these Procedures using an estimation methodology set out (a) in sections 2.2.3 and 2.2.4 of Appendix 2 or an alternate estimation methodology as described in the Network Operators transition plan.</i></p>

			<p>Operator. To have to create a special algorithm to create estimates by translating recorded hourly data between current gas day and new standard gas day (or vice versa) is not cost effective, given the expected small number of instances where estimates will be required and the minimal impact of the half hour time difference. Any such additional complexity may also jeopardise the successful operation of the algorithm that APA will be establishing to translate revised historical pre-1/10 data from the new standard gas day to the old gas day.</p> <p>What about general metering data issues (not GDH reconfiguration related) that may arise during this period? The Network Operator needs to be able to apply an existing estimation methodology to derive estimates where it can't obtain actual data in these circumstances.</p> <p>Suggest deleting this note.</p>		
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Participants are to complete the relevant columns below in order to record their response.					
Attachment A - Retail Market Procedures (Queensland)					
Participant feedback for this procedure					
Ref #	Company	Clause #	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response (AEMO only)
6	Origin		Origin request that AEMO add the following as per South Australia and New South Wales.	Hourly Metering Data: For each of the meter reconfiguration scenarios above, a description of how the <i>network operator</i> and <i>pipeline operator</i> will ensure that metering data or <i>physical gate point metering data</i> is provided for the last hourly interval for the <i>gas day</i> 30 September 2019 will only include data for the period from 05:00am to 06:00am AEST.	Hourly metering data is supplied to AEMO in SA but is not supplied in NSW/ACT or QLD. It is therefore not possible to make this inclusion without fundamental changes to the relevant procedure. We have included the equivalent requirement in NSW/ACT and QLD for meter readings for a gas day 30 September 2019 to cover the shorter gas day only. Noting the above, AEMO does not support Origin Energy proposal to add the suggested provision.



IMPACT IMPLEMENTATION REPORT (IIR)
ISSUE No: IN009/18.



Participants are to complete the relevant columns below in order to record their response.					
Attachment A - Retail Market Procedures (NSW/ACT)					
Participant feedback for this procedure					
Ref #	Company	Clause #	Issue / Comment	Proposed text <small>Red strikeout means delete and blue <u>underline</u> means insert</small>	AEMO Response (AEMO only)
7	APA/AG N/Allgas	12B.1(c)	(see above – same as for SA RMP 419(c) (Note)	{Note: The estimated hourly volumes will not be determined under clause 3.1.6 (b) of these Procedures using an estimation methodology set out attachment 2}	See item # 5



ATTACHMENT E – IIR RESPONSE TEMPLATE

The IIR response template has been attached separately to this document. There are two sections within the template. Section 1 seeks feedback on the on the IIR itself. Section 2 seeks feedback on each of the changes to each of the procedures. Anyone wishing to make a submission for this second and final stage consultation are to use this response template. Submissions close 15 May 2019 and should be emailed to grcf@aemo.com.au.