

IMPACT & IMPLEMENTATION REPORT (IIR)

Summary Section

Issue Number	IN003/19W		
Impacted Jurisdiction(s)	Western Australia		
Proponent	Arjun Pathy	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	Tuesday, 4 February 2020
Short Description of change(s)	Holistic tidy-up of RMP (WA)		
Procedure(s) or Documentation impacted	Retail Market Procedures (Western Australia)		
Summary of the change(s)	Editorial and process-improvement changes to the RMP (WA)		
IIR Prepared By	Arjun Pathy	Approved By	Michelle Norris
Date IIR published	Tuesday, 3 March 2020	Date IIR consultation concludes	Tuesday, 31 March 2020
Email Address for Responses	grcf@aemo.com.au		
Other key contact information	arjun.pathy@aemo.com.au		



IMPACT & IMPLEMENTATION REPORT

CRITICAL EXAMINATION OF PROPOSAL

1. DESCRIPTION OF ISSUE

At the February 2019 prioritisation session, the Gas Retail Consultative Forum (GRCF) agreed to conduct a holistic “tidy-up” of the Retail Market Procedures (RMP) (WA), the goal of which was to collate all minor and non-contentious amendments to the RMP (WA) into a single consultation. From July 2019 to November 2019, AEMO worked with the GRCF to develop a list of non-controversial process improvement, editorial, or clarification changes that could be incorporated into a procedure change request (PCR).

Participants submitted their feedback on these changes in December 2019 and from this AEMO developed a PCR. AEMO parked all controversial changes in the Register of Retail Market Issues and Changes, meaning that the PCR only included changes that had received broad support from industry.

2. REFERENCE DOCUMENTATION

Attachment A provides a full track-changes RMP (WA), which details all changes (editorial and otherwise) proposed to the RMP (WA) as part of this consultation.

Attachment B provides all submissions received by AEMO on the PCR consultation, as well as AEMO’s response to them.

3. OVERVIEW OF CHANGES

As outlined in Section 1, this IIR contains all changes raised in pre-consultation by AEMO or WA gas retail market participants that entail no material market impact or IT system impact and that participants did not oppose in pre-consultation. Additionally, as highlighted in pre-consultation and in the PCR, this IIR incorporates the changes proposed as part of IN007/18W, which changes “procedure change committee” and “procedure change request” to “gas retail consultative forum” and “proposed procedure change” respectively. GRCF participants unanimously supported IN007/18W in their responses to the Gas Market Issue (GMI) for that change.

Participants were broadly supportive of the changes proposed in the PCR. AEMO has made some minor additional clarificatory or editorial changes in response to participant feedback. No substantial changes have been proposed additional to those in the PCR.

4. LIKELY IMPLEMENTATION EFFECTS AND REQUIREMENTS

Since all changes with a material market or IT system impact have been excluded from this consultation, there should be minimal implementation requirements for participants or AEMO as a result of this consultation. Some participants may need to make minor process changes.

5. OVERALL COST AND BENEFITS

The benefits of the changes will be:

- With respect to the clarification and editorial changes, clarity of the RMP (WA).
- With respect to the minor process improvements, efficiencies for the WA retail gas market.



6. MAGNITUDE OF THE CHANGES

Since no changes proposed in this IIR require system changes or substantial process changes, there are not expected to be any costs, and AEMO considers this change to be *non-material*.

7. AEMO'S PRELIMINARY ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH CLAUSE 378 OF THE RMP:

Clause 378 of the RMP states:

AEMO may only make procedures if AEMO is satisfied that the procedures are consistent with the following objectives:

- (a) to ensure that the retail gas market operates and is governed in a manner that is:

 - (i) open and competitive; and*
 - (ii) efficient; and*
 - (iii) fair to participants and their customers; and**
- (b) to ensure compliance with all applicable laws; and*
- (c) to ensure consultation with all participants, pipeline operators, prescribed persons and interested persons as is reasonably required to meet the objectives set out in this procedure.*

AEMO's assessment of this IIR's compliance with clause 378 is given below.

<p><i>(a) to ensure that the retail gas market operates and is governed in a manner that is:</i></p> <p><i>(i) open and competitive; and</i></p>	<p>The proposed changes enhance the clarity of a number of provisions in the RMP (WA), which would assist new entrants to the WA gas retail market to understand their obligations under the RMP (WA). Further, the changes do not unreasonably discriminate between participants, which ensures that the RMP (WA) continues to uphold competition in the WA gas retail market.</p>
<p><i>(ii) efficient; and</i></p>	<p>There are several process improvements proposed as part of the IIR (such as removing AEMO's involvement in above / below 10 TJ determinations in clauses 138-140), which will decrease the financial and temporal cost of the corresponding processes without decreasing their effectiveness.</p>
<p><i>(iii) fair to participants and their customers; and</i></p>	<p>As stated above, the changes do not unreasonably discriminate between participants. Further, the changes do not adversely impact customers.</p>
<p><i>(b) to ensure compliance with all applicable laws; and</i></p>	<p>AEMO's view is that the proposed changes are consistent with the applicable laws.</p>



(c) *to ensure consultation with all participants, pipeline operators, prescribed persons and interested persons as is reasonably required to meet the objectives set out in this procedure.*

AEMO held an extensive pre-consultation, wherein all WA gas retail market participants were invited to submit changes to be included in this consultation. Participants submitted feedback to these changes as part of the PCR consultation and are invited to provide additional feedback as part of this IIR consultation. Additionally, AEMO conducted a workshop on 21 January 2020 to which all WA gas retail market participants were invited to outwork any controversial items as part of this consultation. Some minor clarity edits notwithstanding, no objections to the proposed changes were raised by participants at that workshop.

8. CONSULTATION FORUM OUTCOMES

Following an extensive pre-consultation process with the GRCF, AEMO published a PCR on these changes on 6 January 2020. WA gas retail market participants and interested parties were invited to provide comment on this PCR by Tuesday 4 February 2020.

AEMO received four submissions on this PCR, these being from AGL, Alinta Energy, ATCO Gas, and Origin Energy. Except for the specific comments listed in Attachment B, these submissions raised no general concerns with AEMO's proposals in the PCR. Several proposals suggested minor wording or typographical edits, and ATCO Gas's submission suggested changes to a number of AEMO's proposed amendments. AEMO has accepted many of these suggestions. A full list of feedback given and AEMO's responses is provided in Attachment B.

9. AUTHORISATION REVIEW

The Australian Competition and Consumer Commission (ACCC) granted Authorisations to REMCo to operate Chapter 5 (Allocation, Reconciliation and Swing) and Chapter 6 (Compliance and Interpretation) of the RMP and associated ancillary deeds. The ACCC approved variations to the Authorisations to enable REMCo to transfer administration to AEMO.

Authorisation is a process where the ACCC may grant protection from legal action for anti-competitive conduct that might otherwise breach the Competition and Consumer Act 2010 (the CCA) where there is an offsetting public benefit from the conduct.

Changes to the RMP Chapters and ancillary deeds covered by the Authorisations must be assessed to determine whether the change impacts the Authorisation.

AEMO's legal team has determined that the proposed changes are procedural and do not materially change the substantive obligations of AEMO or participants and therefore do not impact the ACCC authorisation.



IMPACT & IMPLEMENTATION REPORT – RECOMMENDATION(S)

10. SHOULD THE PROPOSED PROCEDURES BE MADE)?

AEMO recommends that the proposed changes to the RMP (WA) be made, including the additional changes made between the PCR and IIR. See attachment A that shows the track-changes version of the RMP (WA).

11. PROPOSED TIMELINES

AEMO proposes the following timeline:

- 3 March 2020: IIR is issued for IN003/19W.
- 31 March 2020: Responses close for IIR.
- April: AEMO issues AEMO Decision on IN003/19W and submits to Economic Regulation Authority (ERA).
- Target effective date (subject to all approvals) 1 July 2020.



ATTACHMENT A – DOCUMENTATION CHANGES (SEE SECTION 3)

AEMO has provided a track-changes version of the RMP (WA) alongside this IIR. In the track-changes RMP (WA) issued alongside the PCR, AEMO included comments cross-referencing the changes in the RMP (WA) and the associated proposals by AEMO or participants as part of pre-consultation.

Respondents to the PCR have indicated that they are comfortable with any changes on which they did not comment in their feedback. Therefore, for clarity of the track-changes RMP (WA) issued with this IIR, AEMO has removed the original comments from the RMP (WA) issued with the PCR and replaced them with comments cross-referencing any additional changes to the RMP (WA) with the participant feedback listed in Attachment B.

ATTACHMENT B – SUBMISSIONS RECEIVED ON IN003/19W PCR

Ref #	Org	Cl. #	Issue / Comment	Proposed text – Red-strikeout means delete and <u>blue underline</u> means insert	Rating ¹ (H/M/L)	AEMO Response (AEMO only)
1	ATCO Gas	2	ATCO agrees with AEMO's proposed definition inclusion	<p><u>"above 10TJ determination" means a determination made under clause 139 or clause 140 to indicate that the user believes the gas deliveries to a customer at a delivery point will likely exceed 10 TJ in the year immediately following the day of determination.</u></p> <p><u>"below 10 TJ determination" means a determination made under clause 139 or clause 140 to indicate that the user believes the gas deliveries to a customer at a delivery point will likely not exceed 10 TJ in the year immediately following the day of determination.</u></p>		AEMO notes the respondent's support for the proposal.

¹ L = Low: Not critical. Issues / Comments are minor. They add clarity to the document. No major concern if not included in any further revisions
M = Medium: Important. Strong case that issue / comments should be consider and an update to the document is desirable, but not critical.
H = High: Critical. The issue / comments are fundamental and failure to make necessary changes has the potential to impact consensus.



Ref #	Org	Cl. #	Issue / Comment	Proposed text – Red strikeout means delete and <u>blue underline</u> means insert	Rating ¹ (H/M/L)	AEMO Response (AEMO only)
2	Origin Energy	2	Definition – AEMO Specification Pack Additional wording to the definition “AEMO Specification Pack” Origin Energy supports the additional wording to this definition as it assists in providing clarity.		M	AEMO notes the respondent’s support for the proposal.



3	ATCO Gas	2	<p>Definition - discovery address</p> <p>Update definition with NSW definition</p> <p>ATCO does not support AEMO's proposed change, the existing definition and accompanying "{clarification notes}" in the RMP provides a clear description of address attributes used in the WA gas market and to assist in ensuring unnecessary misinterpretation in discovery address construction for WA gas market.</p>	<p>Maintain existing definition</p>	<p>AEMO considers that the current definition within the RMP (WA) includes a level of technical detail that would be better placed in the AEMO Specification Pack. Section 4.3.2.2. (NMIDiscoveryRequest) of the FRC B2B System Interface Definitions already contains the technical details for a discover address request and includes an example of the transaction, including the addressing fields. Adding similar technical details in the RMP (WA) is an unnecessary duplication and raises the risk of a mismatch between the documents in the future in the event of a change, which is one of the reasons why AEMO doesn't support maintaining the existing definition. It should be noted that AEMO Specification Pack has the equivalent head-of-power standing as the RMP.</p> <p>AEMO also notes that the proposed definition is currently used in New South Wales, the Australian Territory, Queensland, and Victoria without adverse consequence. AEMO further notes that AEMO's proposed definition was recently adopted for the RMP (SA) as part of consultation IN006/17 (SA Harmonisation), with no participants raising concerns that the</p>
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						<p>change of definition would adversely affect the SA market.</p> <p>Further, for east coast market participants who may wish to participate in the WA market, AEMO's proposed definition will lower barriers to entry inasmuch as the definitions would be clearly analogous between the two coasts. In this way, AEMO believes that its proposed definition would (if anything) reduce the risk of misinterpretation in discovery address construction.</p> <p>Given the above, AEMO does not support ATCO Gas's proposal to maintain the existing definition.</p>
4	Origin Energy	2	<p>Definition – discovery address</p> <p>Update to the definition "discovery address"</p> <p>Origin Energy support the update to the definition for discovery address as it aligns with the NSW/ACT Retail Market Procedures.</p>		M	AEMO notes the respondent's support for the proposal.



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5	ATCO Gas	2	<p>Definition - GBO ID</p> <p>Seems unnecessary for AEMO to issue a GBO ID to itself</p> <p>ATCO does not agree with AEMO's proposal.</p> <p>NO relies on AEMO's identifier ("WAGMO") to enable NO to process WA market transactions. The proposed definition removal would result in the insertion of a new definition that confirms the WA gas market operator is identified as "WAGMO".</p>	<p><u>Maintain existing definition</u></p>		<p>Under clause 22(1) of the RMP (WA), AEMO must ensure that it have a unique GBO identification. The changes to the GBO identification definition are purely for increasing the clarity of the definition's wording. As such, AEMO does not agree that the concerns raised by ATCO would be realised.</p>



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6	ATCO Gas	2	<p>Definition – meter</p> <p>ATCO does not support the proposed change in its current wording as it is not consistent with ATCO’s approved Access Arrangements and WA Gas Standards Regulations.</p>	<p><u>Maintain existing definition</u></p> <p>“meter” means a meter used to measure the amount of gas supplied to a delivery point and includes any associated regulators, pipes, fittings, components, equipment or instruments.</p> <p><u>{Note: These meters are sometimes referred to as “master meters” or “custody transfer meters”, and are not “submeters”.</u></p> <p>means a device used to directly measure the mass or volume of gas passing through it and includes the associated equipment attached to the device to filter, control or regulate that flow of gas.</p>		<p>AEMO does not believe ATCO Gas’s suggested change is warranted. ATCO Gas’s current Access Arrangements (AA) definition of meter does not align with the current version of RMP (WA) so the AA and the RMP are already different. AEMO notes that the proposed definition is used in all east coast jurisdictions (including South Australia, as of the completion of IN006/17), despite there being six different distributors on the east coast, each with their own access arrangements. AEMO further notes that these access arrangements have definitions of “meter” that differ from that in the RMP (such as, for instance, the access arrangement for AusNet Services, which can be found here²). Given this, and given the fact that the change in definition is clarificatory-only and does not change the actual meaning of the term. AEMO does not agree it is necessary for consistency in wording to be maintained between definitions in ATCO Gas’s Access Arrangements and those in the RMP (WA).</p>



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7	ATCO Gas	2	<p>Definition - meter number</p> <p>ATCO does not support the proposed change – the existing definition is clear in describing that a meter number in Western Australia must be alpha-numeric as assigned by NO.</p>	<p><u>Maintain existing definition</u></p> <p>“meter number” means <u>the unique alphanumeric identifier assigned to a meter by the network operator or meter manufacturer.</u>a unique identification number allocated to a meter.</p>		<p>AEMO does believe that ATCO Gas’s proposed change is warranted. Specifying the format of the number (i.e. alphanumeric) belongs in the AEMO Specification Pack rather than the RMP. The FRC B2B System Interface Definitions defines meter number being a “string”. Including a similar technical description within the RMP is an unnecessary duplication that raises the risk of a mismatch between the documents in the future in the event of a change.</p> <p>Further, AEMO notes that the proposed definition is used in all east coast jurisdictions without adverse consequence. Further, for east coast market participants who may wish to participate in the WA market, AEMO’s proposed definition will lower barriers to entry inasmuch as the definitions would be clearly analogous between the two coasts, increasing clarity for such participants.</p> <p>As such, AEMO doesn’t support ATCO’s proposal.</p>

² <https://www.aer.gov.au/system/files/AER%20-%20Approved%20access%20arrangement%20-%20AusNet%20Services%202018-22%20-%20Part%20A%20-%20final%20decision%20revisions%20marked%20-%20November%202017.pdf>



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8	Alinta Energy	2	Definition – meter number Defined terms should be in italics	means a unique identification number allocated to a <u>meter</u> .	L	AEMO notes the respondent’s comment and has made the change accordingly.
9	AGL	2	AGL noted that the current definition did not seem correct. For example, a request for a meter investigation may not lead to a change in standing data, and would therefore not be captured by the definition. AEMO has requested a redrafting which is now supplied.	“transaction” means the process initiated by the lodgement of a <i>request or notice with AEMO to AEMO or another participant</i> under these procedures, which if completed, will result in an amendment to the AEMO standing data.	M	Under the RMP (WA), a Request for a Meter Investigation is not a transaction; therefore, AEMO believes that the current definition is correct.



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10	ATCO Gas	2	<p>Definition - street / suburb combination</p> <p>Align to common definition</p> <p>ATCO does not support AEMO's proposal – refer comment at 'discovery address' proposal</p>	<u>Maintain existing definition</u>		<p>See AEMO's response to item 3. AEMO does not support maintaining the existing definition.</p> <p>Further, AEMO notes Appendix E. (Refresh of New Street Listing for MIRN Discovery (T298)) of the FRC B2B System Interface Definitions, which already contains the technical details for a street / suburb combination table and includes details about the address elements. Including similar technical details in the RMP (WA) is an unnecessary duplication that raises the risk of a mismatch between the documents in the future in the event of a change, which is one of the reasons for which AEMO does not support maintaining the existing definition. It should also be noted that Appendix A of the FRC B2B System Interface Definitions also provides further details on the CSV address elements.</p>
11	Alinta Energy	2	<p>Definition – street / suburb combination</p> <p>Defined term should be in italics</p>	means, in relation to a <u>MIRN discovery request</u> , the <u>discovery address</u> excluding the street number or its equivalent.		AEMO notes the respondent's comment and has made the change accordingly.



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12	ATCO Gas	2	<p>"unaccounted for gas" is never defined</p> <p>ATCO queries AEMO's interpretation an proposed change and refers AEMO to ATCO's approved Access Arrangements for a discussion on the components of UAFG – proposed definition attached.</p>	<p><u>"unaccounted for gas" is the difference between the amount of gas injected into the sub-network at all physical gate points and the amount of gas withdrawn from the sub-network at all delivery points, including but not limited to leakage or other actual losses such as third party damage to pipes, discrepancies due to metering inaccuracies and variations of temperature, pressure and other parameters.</u></p>		<p>See AEMO's response to item 6. AEMO does not believe ATCO Gas's change is warranted.</p> <p>Further, AEMO notes that ATCO Gas's Access Arrangements (as viewed on the ERA's website³) do not contain reference to "third party damage to pipes", referring to the definition on page 22 of that document. As such, AEMO does agree that it is necessary to incorporate it into the definition in the RMP (WA).</p>

³ <https://www.erawa.com.au/cproot/20819/2/ERA---GDS-AA5-Access-Arrangement-Information.PDF>



13	ATCO Gas	73	<p>AEMO:</p> <p>AEMO does not believe that the RMP (WA) obligate AEMO to review MIRN discovery requests; as such, AEMO's proposed change does not alter AEMO's obligations under the RMP. Further, given the annual EIC audit and the fact that AEMO is entitled to inspect EIC records under clause 73(4), AEMO believes that it has adequate capacity to monitor any issues that may emerge.</p> <p>ATCO Response:</p> <p>ATCO does not agree with AEMO's determination to remove cl 73.</p> <p>ATCO maintains that AEMO as independent market operator should be responsible to deliver upon a regular review of Western Australia MIRN discovery requests as previously noted.</p> <p>The GMI which planned to introduce the Complete MIRN Listing in January 2019 to assist retailers with the timely completion of customer</p>	<p>Maintain existing clause</p>	<p>AEMO reiterates that there is no head of power for AEMO to review MIRN discovery requests in clause 73, which merely grants AEMO the right (but not the obligation) to review users' compliance with clause 72. Further, AEMO retains the right to review users' compliance with clause 72, since AEMO has not proposed the removal of clause 73(4). As such, the retention of clauses 73(2) and 73(3) will not impart the responsibility to regularly review WA MIRN discovery requests on AEMO. If ATCO Gas believes that such a responsibility should be imparted on AEMO, AEMO would encourage ATCO Gas to raise a GMI to that effect.</p>
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			<p>transfers based on discovery addresses and which was eventually implemented in October 2019 following ERA approval, is meant to advise the market operator on the quality of retailers' submitted MORN discovery requests (not just EIC).</p> <p>It is ATCO's understanding that retailers are not effectively using the complete MORN listing as intended and we assert that the market operator should always provide oversight on MORN discoveries to help uphold timely customer transfers without additional oversight by ATCO as NO</p>			



14	ATCO Gas	138	<p>AEMO:</p> <p>ATCO's proposed change from ongoing evaluations to a record of >10 TJ consumption over the previous two years does not require AEMO's involvement, and AEMO therefore maintains its proposal that the RMP (WA) be rewritten such that the network operator and users may communicate directly with one another to effectuate an above 10 TJ determination or a below 10 TJ determination. Regarding the change from the current assessment methodology under Clause 139 to a new methodology based on gas consumption's being greater than or equal to 10 per year for the two previous years, AEMO wishes to know participants' views on the matter. If the GRCF unanimously supports this change, AEMO will incorporate it into the PCR.</p> <p>ATCO:</p> <p>ATCO does not agree with AEMO's proposal to remove</p>		<p>AEMO notes that all participants present at the 21 January 2020 GRCF workshop unanimously agreed that AEMO did not need to be involved in above / below 10 TJ determinations. Further, no participant other than ATCO Gas supported the proposed methodology that the above / below 10 TJ determinations be made on the basis of the preceding two years' gas consumption being above / below 10 TJ in both years.</p> <p>ATCO Gas has stated in its feedback that it already discusses end-use customers' gas use needs with users. As such, there is no additional benefit to AEMO's acting as a "middle-man" between users and ATCO Gas, and ATCO Gas has not provided benefits that AEMO's involvement adds to this process.</p> <p>Regarding whether AEMO's determination is consistent with ATCO Gas's approved Access Arrangements (AA), AEMO would note that the above / below 10 TJ determination in clauses 138-140 as written in the current RMP (WA) v7.0 purely reflects whether AEMO believes the gas deliveries will / will not exceed 10 TJ in the year immediately following the determination on the basis of the</p>
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		<p>itself from cl 138 as previously noted.</p> <p>ATCO already discusses end-use customers' gas use needs with retailers and ATCO maintains that the Western Australia market operator should make a determination that is independent of ATCO's assessment of a customer's gas use needs and which is consistent with ATCO's approved Access Arrangements. As also noted it is ATCO's view that the 10TJ determination be absolute and not subject to ongoing and potentially subjective assessments and reassessments which do not add value.</p> <p>ATCO therefore proposes that rather than change AEMO's role, a sub clause is introduced to prescribe the conditions pursuant to which an existing delivery point must have an above 10TJ determination. ATCO proposes the condition should be:</p> <p>"If gas consumption has been 10 TJ (or more) per year for the last</p>			<p>information provided by the user. Given this, AEMO does not believe there are concerns regarding consistency with ATCO Gas's AA in the present scenario. Further, the proposed change and whether it remains consistent with ATCO Gas's AA, the provisions in AA clause 13.2(b)(ii) (Rules for interpreting the Access Arrangement (AA)) allow for amendments to the Retail Market Procedures (RMP). Therefore the AA and the RMP will not contradict one another if amendments to the RMP are made.</p>
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			2 consecutive years then an interval meter must be fitted”.			
15	AGL	138	Clause - Determination for meter change from basic to interval and interval to basic AGL supports the position that the definition be clear about the requirements and conditions to both upgrading a basic meter to an interval meter, or downgrading an interval meter to a basic meter, and such determination is made by the network operator in conjunction with the User.		M	AEMO notes the respondent’s support for the change.



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16	Origin Energy	138	<p>Clause - Network operator to identify sites which consumed more than 10 TJ/a</p> <p>Origin Energy supports the removal of AEMO from the wording of this clause as it sets out the requirements on the network operator to liaise directly with the user in relation to determining sites above/below 10TJ.</p>		M	AEMO notes the respondent's support for the change.