

28 September 2020

## **Notice to all Registered Participants in accordance with clause 383(3) of the Retail Market Procedures Western Australia (RMP WA)**

This notice is to advise Participants on AEMO's decision on whether to submit amendments on the following to the Economic Regulation Authority (ERA):

- FRC B2B System Interface Definitions
- Specification Pack Usage Guide

This notice advises Gas Market Registered Participants that consultation under the ordinary Procedure change consultative process prescribed under clause 383 of RMP WA concluded on 10 September 2020 for:

- IN003/20W (CDN and CDR for WA)

Prior to commencing the ordinary consultation process, AEMO published the Proposed Procedure Change (PPC) on the AEMO website as described in clause 380(2) of the RMP WA. As required under clause 381(2) the Gas Retail Consultative Forum (GRCF) were invited to examine the PPC. AEMO received submissions from AGL, Alinta Energy, Origin Energy, Simply Energy, and Synergy. These submissions supported the majority of AEMO's proposed changes and suggested a number of minor editorial changes to the RMP WA. AEMO incorporated most of these suggested changes into the draft RMP WA issued alongside the Impact and Implementation Report (IIR).

As per clause 383(1) of the RMP WA, AEMO published on its website a consultation notice inviting participants, pipeline operators, prescribed persons and interested persons to submit written comments on the IIR, which provided details about the proposed change including a draft identifying the amendments with marked up changes. Submissions closed on 10 September 2020. AEMO received submissions from AGL, Alinta Energy, Origin Energy, ATCO Gas and Simply Energy supporting the proposal and proposing a number of additional minor editorial amendments.

Having considered feedback to the PPC consultation and given the unanimous support to the IIR consultation, AEMO has decided to submit an application for approval of the proposed amendments for IN003/20W to the Economic Regulation Authority (ERA). These proposed amendments will incorporate several of the additional editorial amendments proposed in response to the IIR.

AEMO intends to submit the amendments for IN003/20W to the ERA with three other proposals (IN002/15W, IN009/19W and IN010/20W) that are currently at the IIR stage of consultation. AEMO will provide further advice to participants about when the application for approval will be submitted to the ERA in due course.

AEMO will publish the application for approval at the time it is submitted to the ERA.

Should you require any further information please contact Arjun Pathy on (03) 9609 8983 or at [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

**SUBMISSIONS RECEIVED FOR IN003/20W IIR**

## Section 1 – General comments on the proposed procedure change

Topic	Item#	Who	Response Received	AEMO response
Sections 1 to 9 of the IIR sets out AEMO’s critical examination of the proposal.  Does your organisation support AEMO’s examination of the proposal?  If no, please specify areas in which your organisation disputes AEMO’s examination of the proposal and include information that supports your organisation’s rationale for not supporting AEMO’s examination.	1	AGL	AGL believes that AEMO has reviewed the issue appropriately.	AEMO acknowledges that AGL believes AEMO has reviewed the issue appropriately.
	2	Alinta Energy	Alinta Energy supports the overall proposal to adopt the Customer Details Notification (CDN) and Customer Details Request (CDR) transactions in aseXML schema version r38.	AEMO acknowledges Alinta Energy’s support for the proposal.
	3	ATCO Gas	ATCO supports AEMO’s examination of the proposal. The uplift to schema r38 will require significant effort by ATCO to implement, we note the net benefits are likely derived by this initiative being included within AEMO’s consolidated program of works for 2021.	AEMO acknowledges ATCO Gas’s support for AEMO’s examination.

	4	Origin Energy	<p>The IIR was reviewed and the Origin business have no further feedback.</p>	<p>Given Origin Energy's support for the proposal in response to the PPC, AEMO acknowledges that Origin Energy's position has not changed and therefore that Origin Energy continues to support the changes.</p>
	5	Simply Energy	<p>In line with Simply Energy's submission for IN011/20, Simply Energy supports the proposal, acknowledging the proposal's concurrent implementation with other proposed initiatives with schema impacts.</p> <p>In relation to the feedback provided by Simply Energy, for transaction T71 and terminology changes (MC, etc.), Simply Energy understands that it's been added to the "residual tidy-up" consultation for all east-coast schema initiatives and will consider Simply Energy's feedback as part of that consultation.</p>	<p>AEMO acknowledges Simply Energy's support for the proposal, contingent on the proposal's being implemented alongside other initiatives proposed for Q4 2021.</p>

<p>Sections 10 and 11 of the IIR sets out AEMO's recommendation.</p> <p>Does your organisation support AEMO's position to recommend the procedure changes?</p>	6	AGL	AGL supports AEMO's proposed position.	AEMO acknowledges AGL's support for the initiative.
	7	Alinta Energy	We support including this work in the Q4 2021 east/west bundled program of work to ensure the most cost effective and efficient outcome for both AEMO and market participants	AEMO acknowledges Alinta Energy's support for the initiative.
	8	ATCO Gas	ATCO supports AEMO's position to recommend a procedure change to the ERA.	AEMO acknowledges ATCO Gas's support for the initiative.
	9	Simply Energy	Yes	AEMO acknowledges Simply Energy's support for the initiative.

Section 2 – Specific comments regarding RMP

Ref # 1 - AEMO Specification Pack - FRC B2B System Interface Definitions					
Ref	Participant	RMP Clause #	Issue / Comment	Proposed text <del>Red-strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
10	AGL	4.6.2	Minor editorial to clarify usage of CDN and CDR Responses.	<p><u>In SA, under the National Energy Retail Rules, the Retailer should</u></p> <p>(i) <u>Initiate a CustomerDetailsNotification when customer details change; and</u></p> <p>(ii) <u>Provide a CustomerDetailsNotification in response to a valid CustomerDetailsRequest</u></p> <p><del>under the National Energy Retail Rules, changes to Customer Contact details are to be supplied to the Network Operator.</del></p> <p><del>In SA, the Retailer must provide a CustomerDetailsNotification in response to a valid CustomerDetailsRequest.</del></p> <p>In WA, the Retailer may provide a CustomerDetailsNotification only in response to a valid CustomerDetailsRequest, <u>but should not initiate a CustomerDetailsNotification when customer details change</u>. See section 4.6.3 for further details on CustomerDetailsRequest.</p>	<p>Given that this consultation is for WA, AEMO cannot consider changes that affect South Australia. AEMO will therefore add the proposed SA changes to the “residual tidy-up” consultation (IN018/20).</p> <p>Regarding the WA changes, AEMO considers that AGL’s proposal is implied by the existing text—i.e. if customer details change but no CDR has been submitted, then the clause as-proposed in the IIR would mean that the Retailer should not send a CDN. As such, AEMO believes this amendment is unnecessary and will not be adopting it.</p>
11	AEMO	4.6.2	Minor editorial to align with the first paragraph in 6.2.1.	<p><u>In relation to the first paragraph in section 4.6.2 insert the words “planned works” after the words “in terms of handling”</u></p>	AEMO support this change.

Ref # 1 - AEMO Specification Pack - FRC B2B System Interface Definitions

12	AGL	4.6.2.1	Trigger	<p>This interface is triggered</p> <ul style="list-style-type: none"> <li>(i) when a Retailer makes a change to a MIRN's Customer details <a href="#">(for SA only); and</a></li> <li>(ii) <a href="#">In response to a CustomerDetailsRequest from the Network Operator</a></li> </ul>	<p>AEMO will make the proposed change but will add the following words “(for WA only) after the words “from the network operators” in point (ii).</p> <p>Given that this consultation is for WA, AEMO cannot consider changes in (ii) that affect South Australia. AEMO will therefore add the proposed SA changes to the “residual tidy-up” consultation (IN018/20).</p>
13	AGL	4.6.3	<p>The CDR transaction has reason as Mandatory, but the enumerated reasons are listed; for clarity these reasons should be listed in the CDR table.</p> <p>The values provided have been sourced from the Electricity B2B Customer and Site Details. Alternatively, the Gas Procedures could point to the Electricity B2B procedures for these details.</p>	<p><a href="#">Allowed values</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Returned Mail</a></li> <li>• <a href="#">Missing Customer Details</a></li> <li>• <a href="#">Confirm Life Support</a></li> <li>• <a href="#">No response to rejected CDN</a></li> <li>• <a href="#">Transfer Complete, no CDN Received</a></li> <li>• <a href="#">New Connection, no CDN Received</a></li> <li>• <a href="#">Data Quality Issue</a></li> <li>• <a href="#">Other</a></li> <li>• <a href="#">Rec – confirm no SensitiveLoad (Reconciliation only) (obsolete, no longer used for CDR)</a></li> </ul> <p><a href="#">Notes regarding the allowed values</a></p>	<p>AEMO does not support this change. The allowable values are listed in Appendix A (Data Dictionary), as for other enumerated fields (such as “Reason for Read” in the MeterDataNotification transaction). To remain consistent with the rest of the document, therefore, AEMO will leave the allowable values listed only in Appendix A.</p>

Ref # 1 - AEMO Specification Pack - FRC B2B System Interface Definitions

				<p><u>“Returned Mail” means the DNSP/MC/MPB has received returned mail with the current PostalAddress held by the DNSP/ MC/MPB.</u></p> <p><u>“Missing Customer Details” means the DNSP/ MC/MPB reasonably believes the customer details have changed and the Retailer has not provided a Notification of the Changes (e.g. move-in has occurred).</u></p> <p><u>“Confirm Life Support” means the MC/MPB requires confirmation of whether the Connection Point has a Life Support requirement or not. Only to be used if agreed between parties. Life support should be confirmed between a Retailer and DNSP using the LifeSupportRequest process in 4.6.</u></p> <p><u>“No response to rejected CDN” means that a DNSP/ MC/MPB has rejected a previous CDN where it was reasonably expected the Retailer would send through a new CDN with updated/corrected information, which has not yet been received.</u></p> <p><u>“Transfer Complete, no CDN Received” means a transfer has completed for the NMI and the DNSP/ MC/MPB believes a CDN has not yet been received within the allowed timeframe.</u></p> <p><u>“New Connection, no CDN Received” means a new connection has completed for the NMI and the DNSP/ MC/MPB believes a CDN has not yet been received within the allowed timeframe. The DNSP/ MC/MPB must provide which specific data they are querying in the SpecialNotes field.</u></p> <p><u>“Data Quality Issue” means that although the data may be technically correct, it may not be fit for purpose (e.g. phone number is 9999999). The DNSP/MC/MPB must provide which specific data they are querying in the SpecialNotes field.</u></p>	
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Ref # 1 - AEMO Specification Pack - FRC B2B System Interface Definitions					
				<p><a href="#">“Other” must only be used for scenarios not covered by the specified allowed values. The DNSP/ MC/MPB must provide the details of the reason in the SpecialNotes field.</a></p> <p><a href="#">“Rec - confirm no SensitiveLoad” means the DNSP/ has a NMI is flagged for Life Support, but it was not included in the CustomerDetailsReconciliation transaction(s) provided by the Retailer.</a></p>	
Ref # 2 - AEMO Specification Pack- Specification Pack Usage Guidelines					
14	AGL		Noted. Suggest that the final schema version for WA may be greater than r38.		AEMO notes AGL’s comment and will amend the schema version number if the changes pursuant to IN002/15W, IN009/19W or IN010/20W proceed.