

IIR response template for IN011/20 (CDN and CDR Changes) – Responses to be emailed to grcf@aemo.com.au by due **COB (AEST) 31 July 2020.**

Review comments submitted by: *Red Energy and Lumo Energy*

Date: 31/07/2020

Contact Person: *Stephen White*

Please complete sections 1. Section 2 and 3 is optional.

Section 1 – General Comments on the Impact and Implementation Report

Topic	Please Provide Response Here
<p>Sections 1 to 8 of the IIR sets out <u><i>AEMOs critical examination of the proposal.</i></u></p> <p>Does your organisation supports AEMO’s examination of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO examination proposal and include information that supports your organisation's rationale why you do not support AEMO examination.</p>	<p>Red Energy and Lumo Energy (Red and Lumo) support the examination of the proposal put forward by AEMO. Red and Lumo continue to believe that this proposal provides benefits to market participants and that the benefits outweigh the potential costs.</p> <p>Red and Lumo support the proposal as part of a package of work done alongside IN003/20 adoption of LSN and LSR transactions.</p>
<p>Section 9 and 10 of the IIR set out <u><i>AEMOs recommendation and timeframes.</i></u></p> <p>Does your organisation support AEMO position to recommend the procedures changes and the timeline for those procedures change to take effect?</p>	<p>Red and Lumo support the proposed timeframe for implementation of Q4 2021. However, we believe that the Notice of Effective Date from AEMO must give adequate consideration to the final decision on the proposed delay for 5 Minute Settlement which will now see 5MS implemented on 1 October 2021.</p> <p>While outside the standard IT change schedule, Red and Lumo propose that the implementation be potentially late November or early December 2021 to allow adequate time for reallocation of resourcing after 5MS for participants.</p>

Section 2 - Feedback on the documentation changes described the Attachments of the IIR.

Red and Lumo provide the feedback below, consistent with the feedback we provided to AEMO on the PPC response.

*****Participants are to complete the relevant columns below in order to record their response.*****

Ref #1 – Participant Build Pack – Process Flow Table of Transactions

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

*****Participants are to complete the relevant columns below in order to record their response.*****

Ref #2 – Participant Build Pack 3 – Interface Definitions

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)									
4.6.1	Amend table and reference to include CustomerDetailsRequest	<table border="1"> <thead> <tr> <th>Transaction Name</th> <th>Ref No</th> <th>Transaction Type</th> </tr> </thead> <tbody> <tr> <td>CustomerDetailsNoti fication</td> <td>70</td> <td>Amend Customer Details</td> </tr> <tr> <td>CustomerDetailsReq uest</td> <td></td> <td>Request Customer Details</td> </tr> </tbody> </table>	Transaction Name	Ref No	Transaction Type	CustomerDetailsNoti fication	70	Amend Customer Details	CustomerDetailsReq uest		Request Customer Details	
Transaction Name	Ref No	Transaction Type										
CustomerDetailsNoti fication	70	Amend Customer Details										
CustomerDetailsReq uest		Request Customer Details										
FIGURE 4-65	Update figure to include reference to CustomerDetailsRequest											
4.6.2.1	Transaction Data Elements. PhoneNumber1 and PhoneNumber2 usage needs to be amended to not be required where the site is vacant.	Required where the Retailer has obtained a telephone number for the purpose of contacting the Customer for supply issues, the number is to be provided in the CustomerDetailsNotification.										

		Not Required where the Site is vacant.	
4.1.3.1	Incorrect Error Codes for Missing Data Notification	Error Codes 3665 and 3666 relate to CSVs not aseXMLs	
ASEXML ELEMENT NAME	Use of DNSP/MC/MPB are incorrect as these relate to electricity not gas.		
Transaction	SpecialNotes references allowable value.	aseXML table does not identify the allowable values outside of "other". Table needs to be updated to clearly identify the allowable values for the SpecialNotes references.	

*****Participants are to complete the relevant columns below in order to record their response.*****

Ref #2a - Participant Build Pack 1 - Process Flow Diagrams

Section #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

*****Participants are to complete the relevant columns below in order to record their response.*****

Ref #3 - Gas Interface Protocol - Victoria

Section #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

*****Participants are to complete the relevant columns below in order to record their response.*****

Ref #4 - Gas Interface Protocol - Queensland

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Participants are to complete the relevant columns below in order to record their response.

Ref #5 - Participants Build Pack 5 - The NSW/ACT specific Participant Build Pack 5.

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Participants are to complete the relevant columns below in order to record their response.

Ref #6 - Participants Build Pack 6 - The NSW/ACT Wagga Wagga and Tamworth specific Participant Build Pack 6.

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Participants are to complete the relevant columns below in order to record their response.

Ref# 7 - Gas Interface Protocol - NSW/ACT

RMP clause #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Participants are to complete the relevant columns below in order to record their response.

Ref #8 - AEMO Specification Pack - FRC B2B System Interface Definitions.

Section #	Issue / Comment	Proposed text Red strikethrough means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
4.6.2.1	PhoneNumber1 and PhoneNumber2 usage needs to be amended to not be required where the site is vacant.	Required where the Retailer has obtained a telephone number for the purpose of contacting the Customer for supply issues, the number is to be provided in the CustomerDetailsNotification. <u>Not Required where the Site is vacant.</u>	
Figure 4-70	CustomerDetailsNotification/CSVCustomer aseXML schema	The sample transaction is still a CSV - needs to be an aseXML transaction. including updating figure 4-70 to remove the words CSV	
4.6.3	Distributor must be changed to network operator	A Distributor must only send a maximum of one CustomerDetailsRequest per MIRN per day <u>A Network Operator must only send a maximum of one CustomerDetailsRequest per MIRN per day</u>	
4.6.3	Reference to CDN should be replaced with CustomerDetailsNotification	Retailer issues updated customer details via the CDN transaction . <u>Retailer issues updated customer details via the CustomerDetailsNotification transaction.</u> The CustomerDetailsRequest transaction is used by the Distributor to notify a Retailer to provide a CDN transaction <u>The CustomerDetailsRequest transaction is used by the Network Operator to notify a Retailer to provide a CustomerDetailsNotification transaction</u>	

4.6.3 & 4.6.2	Section 4.6.3 should be move to proceed 4.6.2 as 4.6.3 provides the context for the CustomerDetailsNotification		
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*****Participants are to complete the relevant columns below in order to record their response.*****

Ref #9 - AEMO Specification Pack- Specification Pack Usage Guidelines

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Section 3¹ (Optional) – Additional feedback that is not part of this consultation but warrants further investigations / discussions.

Topic	Please Provide Response Here
Does your organisation have any feedback / suggestions that closely relates to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please included your feedback / suggestions.	Red and Lumo note that recently Australian Gas Networks (AGN) released its draft South Australian Gas Access Arrangement Terms and Conditions. The draft T&Cs have proposed the introduction of a new clause (Clause 32) which specifically proposes changes to Customer Details provisions provided to AGN. Red and Lumo strongly believe that the GRCF must examine these proposed terms and conditions in light of the CDN/CDR changes. We believe that AGN should present its proposed T&C changes to the GRCF to explain how the changes will interact and address any conflicts. As the T&Cs will commence on 1 July 2021 and this PPC is proposed for Q4 2021 Red and Lumo are concerned that these changes pose a potential requirement on retailers to implement multiple system changes in 2021 to meet these two potential changes.

¹ Note - This feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process