

2 March 2023.

## **Notice to all Registered Participants under the National Gas Rules (NGR).**

This Notice is to advise Participants on AEMO's decision to approve amendments to the:

- Retail Market Procedures (VIC).
- Retail Market Procedures (QLD).
- Retail Market Procedures (NSW-ACT).
- Retail Market Procedures (SA).

This Notice advises Gas Market Registered Participants that consultation under the ordinary Procedure Change Consultative Process prescribed under Rule 135EE of the NGR concluded on 17 February 2023 for:

- IN008/19 - Customer Own Reads (COR) Amend RMPs to have alternate timeline
- IN006/22 - Redundant provisions removed from QLD RMP
- IN011/22 - Compliance resolution. Remove Clause 3.3.2(d) that required AEMO to provide a report to all participants, shippers and transmission pipeline operators
- IN008/22 - Compliance resolution. Update the Register of Weather Related Information to accommodate third party vendors Compliance Resolution
- IN011/15 - Harmonise the definition of Actual Metering with NSW/ACT and SA

As required under Rule 135EE of the NGR, Gas Market Registered Participants and other interested parties were invited to submit comments to AEMO on the Impact and Implementation Report (IIR) for this proposal. AEMO received 4 submissions from AGL, Jemena, Origin Energy and Red/Lumo. AGL, Jemena and Origin Energy agreed with the changes as described in the IIR. Red/Lumo did not agree with the changes described in the IIR related to IN008/19 only, but these views were not shared by other participants.

Attachment B of this Notice sets out the consolidated feedback relating to the proposed amendments that AEMO received during this consultation phase. This attachment includes stakeholder comments, AEMO responses and, based on those responses, an indication where respondent feedback resulted in further amendments to the documents mentioned above.

Having considered the feedback provided, AEMO has approved the proposed amendments (Attachment A) of this Notice and has set the effective date for the changes to be 31 March 2023.

As part of this change, the Register of Weather-Related Information has also been updated. Outside the scope of this consultation but coinciding with the same effective date for the NSW/ACT RMP is IN011/21 (BL and TSF Changes in NSW/ACT). For further information on this, please see the consultation page [here](#).

Updated versions of the documents mentioned in Attachment A will be published on the AEMO website prior to the effective date.

Should you require any further information please contact Jordan Daly on 0422 572 874.

**ATTACHMENT A**  
**Proposed changes: Procedures**  
~~Red~~ ~~strikeout~~ means delete and  
blue underline means insert

Click [here](#) to view the final version of the Retail Market Procedures showing tracked changes between the current version and the changes.

**ATTACHMENT B**  
**Consolidated feedback received during the Impact and Implementation Report (IIR) stage.**

Section 1 - General Comments on the Impact and Implementation Report

Topic	Ref #	Participant	IN#	Participant Response	AEMO response
<p>Sections 1 to 9 of the IIR sets out details of the proposal.</p> <p>Does your organisation support 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's rationale why you do not support AEMO's assessment.</p>	1.	AGL	IN008/19 <sup>1</sup>	AGL supports the AEMO assessment and notes its comments in section 3.	AEMO notes AGL's support for the changes.
	2.	Jemena		Jemena supports this.	AEMO notes Jemena's support for this change.
	3.	Origin		<p>Thank you for the work undertaken for Package 1</p> <p>Origin has no further comment and note all proposed changes to the respective procedures and the Register of Weather Related Information.</p>	AEMO notes Origin Energy's support for these changes.
	4.	Red/Lumo		<p>Reviewing the phrasing of the relevant Customer-own Read (COR) clauses, Red Energy and Lumo Energy (Red and Lumo) disagree with AEMO's assessment that this change 'Reduces costs by lowering the unnecessary additional processing and storage of COR data' or in any way impacts 'additional costs on parties to manage the receipt and storage of unnecessary volumes of meter data '. Although the proposed change allows for parties to share the information at an agreed time and frequency, it doesn't reduce the volume of meter data as the clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate), there is no suggestion that a party can elect to reduce the number of reads shared.</p> <p>The available method for parties to reduce the receipt and storage of unnecessary volumes of meter data is for;</p> <p>a. distributors to validate the read and thereby qualify if it should be stored in a metering database, and shared as metering data, and for</p>	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #6 of the Impact and Implementation Report.

<sup>1</sup> Customer Own Reads (COR) Amend RMPs to have alternate timeline

			b. retailers to provide customers with clear expectations on the acceptance of COR as laid out NERR (rule 21) and ERCoP (rule 59) which both describe the conditions under which a Retailer must accept the customer-own read, and therefore shared with the distributor.	
5.	AGL	IN006/22 <sup>2</sup>	AGL supports the AEMO assessment.	AEMO notes AGL's support for the changes.
6.	Jemena		Not applicable.	
7.	Red/Lumo		Red and Lumo support AEMO's assessment	AEMO notes Red/Lumo's support for the changes.
8.	AGL	IN011/22 <sup>3</sup>	AGL supports the AEMO assessment.	AEMO notes AGL's support for the changes.
9.	Jemena		Not applicable.	
10.	Red/Lumo		Red and Lumo support AEMO's assessment	AEMO notes Red/Lumo's support for the changes.
11.	AGL	IN008/22 <sup>4</sup>	AGL supports the AEMO assessment.	AEMO notes AGL's support for the changes.
12.	Jemena		Jemena supports this.	AEMO notes Jemena's support for this change.
13.	Red/Lumo		Red and Lumo support AEMO's assessment	AEMO notes Red/Lumo's support for the changes.
14.	AGL	IN011/15 <sup>5</sup>	AGL supports the AEMO assessment.	AEMO notes AGL's support for the changes.
15.	Jemena		Not applicable.	
16.	Red/Lumo		Red and Lumo support AEMO's assessment	AEMO notes Red/Lumo's support for the changes.

## Section 2 - Feedback on the documentation changes in the Attachments of the Impact and Implementation Report.

### Retail Market Procedures (VIC)

<sup>2</sup> Redundant provisions removed from QLD RMP

<sup>3</sup> Compliance resolution. Remove Clause 3.3.2(d) that required AEMO to provide a report to all participants, shippers and transmission pipeline operators

<sup>4</sup> Compliance resolution. Update the Register of Weather Related Information to accommodate third party vendors Compliance Resolution.

<sup>5</sup> Harmonise the definition of Actual Metering with NSW/ACT and SA

RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
2.1.1 Creation, Maintenance and Administration	17.	Red/Lumo	The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)  ...each estimated meter reading made ... ...the date to which that estimated meter reading pertains and details of the approved estimation methodology... and... ...the estimated meter reading must also be identified as a customer-own read	(iv) each estimated meter reading made during the data retention period, the date to which that estimated meter reading pertains and details of the approved estimation methodology applied to obtain that estimated meter reading (each estimated meter reading must be identified as such and, where an estimated meter reading is a customer-own read, the estimated meter reading must also be identified as a customer-own read);	AEMO does not agree with Red/Lumo's proposed change. Although the meter reading and day must be provided, allowing more flexible arrangements between participants will reduce the receipt and storage costs associated with unnecessary meter data by bilateral agreement between parties.
2.1.1 Creation, Maintenance and Administration	18.	Red/Lumo	The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate) A Distributor may, but is not required to, include in the meter data database meter readings that are not validated meter readings	(b) The obligations set out in clauses 2.1.1(a)(iii), (iv), (v) and (vi) relate to validated meter readings. A Distributor may, but is not required to, include in the meter data database meter readings that are not validated meter readings (each non-validated meter reading must be identified as such).	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.
2.1.3 Updating of Meter Data Database	19.	Red/Lumo	The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate) ...each Distributor must use its reasonable endeavours to ensure that the information required to be included in its meter data	Except as otherwise provided in clause 2.9 in relation to the period within which such information must be included in the meter data database, each Distributor must use its reasonable endeavours to ensure that the information required to be included in its meter data database is included in that meter data database by 5.00 pm on the first business day following the day on which that information is obtained or calculated by the Distributor.	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.

			database is included in that meter data database by 5.00 pm on the first business day following the day on which that information is obtained or calculated by the Distributor.		
2.1.5 Provision of Meter Reading Information	20.	Red/Lumo	<p>The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)</p> <p>(A) the day on which the meter was read; and (B) the validated meter reading for that meter</p>	<p>(iiib) where the Distributor has been provided a customer own read by the FRO and the Distributor reasonably considers the customer own read to be accurate, the Distributor must use its reasonable endeavours to provide the FRO with the following information;</p> <p>(A) the day on which the meter was read; and (B) the validated meter reading for that meter, by 5.00 pm on the first business day following the day on which the customer own read was received by the Distributor, by 5.00 pm on the first business day following the day on which the customer own read was received by the Distributor, <del>or at a time and frequency agreed by the parties.</del></p>	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.
2.1.5 Provision of Meter Reading Information	21.	Red/Lumo		<p>(vi) where details of a customer-own read are provided by the customer in writing to the Distributor, the Distributor must use its reasonable endeavours to provide those details to the FRO by 5.00 pm on the first business day following the day on which the Distributor received those details, <del>or at a time and frequency agreed by the parties.</del></p>	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.
2.2.3 Customer provided Meter Readings	22.	Red/Lumo		<p>If, following the failure by a Distributor to read a meter, the customer of a Retailer provides the Retailer with details of a customer-own read, the Retailer must use its reasonable endeavours to provide those details to the Distributor by 5.00 pm on the first business day following the day on which it receives those details from the customer. <del>or at a time and frequency agreed by the parties.</del></p>	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.

Retail Market Procedures (QLD)					
RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
2.1.1 Creation, Maintenance and Administration	23.	Red/Lumo	<p>The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)</p> <p>...each estimated meter reading made ... ...the date to which that estimated meter reading pertains and details of the approved estimation methodology... and... ...the estimated meter reading must also be identified as a customer-own read</p>	(iv) each estimated meter reading made during the data retention period, the date to which that estimated meter reading pertains and details of the approved estimation methodology applied to obtain that estimated meter reading (each estimated meter reading must be identified as such and, where an estimated meter reading is a Customer-own read, the estimated meter reading must also be identified as a Customer-own read);	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.
2.1.1 Creation, Maintenance and Administration	24.	Red/Lumo	<p>The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)</p> <p>A Distributor may, but is not required to, include in the meter data database meter readings that are not validated meter readings</p>	(b) The obligations set out in clauses 2.1.1(a)(iii), (iv), (v) and (vi) relate to validated meter readings. A Distributor may, but is not required to, include in the meter data database meter readings that are not validated meter readings (each non- validated meter reading must be identified as such).	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.
2.1.2 Updating of Meter Data Database	25.	Red/Lumo	<p>The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)</p> <p>...each Distributor must use its reasonable endeavours to ensure that the information required</p>	Except as otherwise provided in clause 2.9 in relation to the period within which such information must be included in the meter data database, each Distributor must use its reasonable endeavours to ensure that the information required to be included in its meter data database is included in that meter data database by 5.00 pm on the first business day following the day on which that information is obtained or calculated by the Distributor.	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.

			to be included in its meter data database is included in that meter data database by 5.00 pm on the first business day following the day on which that information is obtained or calculated by the Distributor.		
2.2.3 Provision of Meter Reading Information	26.	Red/Lumo	The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)  (A) the day on which the meter was read; and (B) the validated meter reading for that meter	(v) where the Distributor has been provided a Customer-own read by the FRO and the Distributor reasonably considers the Customer-own read to be accurate, the Distributor must use its reasonable endeavours to provide the FRO with the following information: (A) the day on which the meter was read; and (B) the validated meter reading for that meter, by 5.00 pm on the first business day following the day on which the Customer-own read was received by the Distributor; <del>or at a time and frequency agreed by the parties;</del>	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.
2.2.3 Provision of Meter Reading Information	27.	Red/Lumo		(viii) where details of a Customer-own read are provided by the Customer in writing to the Distributor, the Distributor must use its reasonable endeavours to provide those details to the FRO by 5.00 pm on the first business day following the day on which the Distributor received those details <del>or at a time and frequency agreed by the parties</del> and must identify the details as relating to a Customer-own read; and	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.
2.2.4 Customer provided Meter Readings	28.	Red/Lumo		If, following the failure by a Distributor to read a meter, the Customer of a User provides the User with details of a Customer-own read, the User must use its reasonable endeavours to provide those details to the Distributor by 5.00 pm on the first business day following the day on which it receives those details from the Customer <del>or at a time and frequency agreed by the parties.</del>	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.

Retail Market Procedures (SA)					
RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text <del>Red-strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
3.1.4. Customer-own reads	29.	Red/Lumo	The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties	If, following the failure by a Network Operator to read a meter, or for any other reason consistent with applicable laws, the Customer of a Retailer provides a Customer-own read:	AEMO notes Red/Lumo's comment. Please refer to the



			<p>because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)</p> <p>Each customer-own read validated (processed in accordance with clauses 3.4 to .7) a network operator must provide the user and AEMO with a read.</p>	<p>(a) to its Retailer, the Retailer must use its reasonable endeavours to provide the Customer-own read to the Network Operator by 5.00 pm on the next business day after the day on which it was received from the Customer-<del>or at a time and frequency agreed by the parties.</del></p> <p>(b) to the Network Operator, the Network Operator must process the Customer-own read in accordance with clauses 3.4 to 3.7.</p>	<p>response given in Ref #17.</p>
3.5.3. Estimated meter readings	30.	Red/Lumo	<p>The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)</p>	<p>(a) A Network Operator must calculate an estimated meter reading in accordance with an approved estimation methodology if any one or more of the following applies in relation to a scheduled meter reading:</p> <p>(i) the Network Operator has not obtained an actual meter reading for the delivery point since the previous meter reading of the delivery point; or</p> <p>(ii) the Network Operator is unable to validate an actual meter reading; or</p> <p>(iii) the Network Operator otherwise suspects an error in the actual meter reading, the heating value or other associated data.</p>	<p>AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.</p>
3.6.1. Basic and interval meters	31.	Red/Lumo	<p>The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)</p>	<p>(a) Subject to paragraph (b), a Network Operator must provide:</p> <p>(i) to the User and AEMO (as the case may be) the metering data for a basic-metered delivery point – by 5.00pm on the business day after the Network Operator receives the meter reading (under clause 3.1.1 or as a result of a special meter reading under clause 3.1.2); and</p> <p>(b) If the Network Operator is not reasonably satisfied with its validation of the meter reading by the time specified in paragraph (a)(i), then:</p> <p>(i) it must by the time specified in paragraph (a)(i) provide the data for those MIRNs that passed validation; and</p> <p>(ii) it is permitted one further business day to validate the meter reading for the remaining MIRNs and provide metering data determined on the basis of an actual meter reading, an estimated meter reading or a substituted meter reading (as applicable).</p>	<p>AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.</p>

3.7. Content of metering data	32.	Red/Lumo	<p>The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)</p> <p>For each occasion on which these Procedures require a Network Operator to provide a current User with metering data for a basic-metered delivery point... the full set of metering data is required to be provided. There is no ability to send one read in place of three reads.</p>	<p>(a) For each occasion on which these Procedures require a Network Operator to provide a current User with metering data for a basic-metered delivery point, (except where the User has become the current User as a result of a transfer taking effect under clause 6.8.2 it must provide at least the following:</p> <ul style="list-style-type: none"> <li>(i) MIRN;</li> <li>(ii) meter type;</li> <li>(iii) date of the previous meter reading;</li> <li>(iv) date of current meter reading;</li> </ul> <p style="padding-left: 40px;">Note: For a move in, this may be the date on which the deemed meter reading is deemed to have occurred by clause 3.1.3.</p> <ul style="list-style-type: none"> <li>(v) index reading of the previous meter reading;</li> <li>(vi) current index reading;</li> <li>(vii) pressure correction factor;</li> <li>(viii) meter reading type;</li> <li>(ix) heating value used to calculate the consumed energy;</li> <li>(x) consumed energy; and</li> <li>(xi) next scheduled meter reading date.</li> </ul>	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.
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Retail Market Procedures (NSW/ACT)					
RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text <span style="color: red;">Red-strikeout</span> means delete and <span style="color: blue; text-decoration: underline;">blue underline</span> means insert	AEMO Response (AEMO only)
3.1.3 Customer provided Meter Readings	33.	Red/Lumo		(a) to its Retailer, the Retailer must use its reasonable endeavours to provide the Customer-own read to the Network Operator by 5.00 pm on the next business day after the day on which it was received from the Customer, <del>or at a time and frequency agreed by the parties.</del>	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.
3.5.1 General Meter Readings	34.	Red/Lumo	The volume of meter data is not reduced by providing the opportunity for participants to share customer-own reads at a time and frequency agreed by the parties because these clauses still require parties to indicate the day and meter reading, (where the party considers the read to be accurate)	(f) Unless the Network Operator has been provided with a Customer-own read (Actual) where the Network Operator has been provided a Customer-own read by the FRO or the Customer, and the Network Operator reasonably considers the Customer-own read to be accurate, the Network Operator must use its reasonable endeavours to provide the FRO with the following information: (i) the day on which the meter was read; (ii) the next scheduled read date;	AEMO notes Red/Lumo's comment. Please refer to the response given in Ref #17.

				(iii) the validated meter reading for that meter; and (iv) a flag indicating that the reading was a Customer-own read, by 5.00 pm on the next business day after the day on which the Customer-own read for a gas meter was validated by the Network Operator or by 5.00 pm on the 5th business day after the day on which the Customer-own read for a hot water meter was received by the Network Operator <del>or at a time and frequency agreed by the parties.</del>	
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Section 3<sup>6</sup> – Additional feedback that is not part of this consultation but warrants further investigation/discussion.

Topic	Ref#	Organisation	Participant response	AEMO response
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.	35.	AGL	AGL notes AEMOs comments regarding definitions and suggest that the definition of CoR be added to the change register for future action.	AEMO notes AGL's comment and suggests this proposal is submitted in the form of a GMI to the GRCF.
	36.	Jemena	No further feedback or suggestions.	AEMO notes Jemena's comment.

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<sup>6</sup> 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