



#### **Summary Section**

Ref# (if applicable)	IN008-24		
Impacted jurisdiction(s)	All		
Proponent	Raj Yinti and Nandu Datar	Company	AEMO
Proponent email	grcf@aemo.com.au		
Affected Gas Market(s)	Retail		
Date proposal published by AEMO	15/10/2024	Date proposal sent to AEMO	02/09/2024
Short issue title	Transport Layer Security (TLS) documents.	update and amendments to othe	er Technical Protocol (TP)
Procedure(s) or Documentation impacted	Please refer to Section 2		
Other key contact information			

Version #	Presented to	Date
1.0	GRCF	15 October 2024

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New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia Australian Energy Market Operator Ltd ABN 94 072 010 327

# Proposed Procedure Change (PPC) – Detailed Report Section

# **Critical Examination of Proposal**

1. Description of issue

## 1.1. Transport Layer Security (TLS). Amendments to Technical Protocol (TP) documents.

Electricity and Gas market participants connect to many of AEMO's systems securely using TLS certificates supplied by AEMO.

TLS Certificates are only required by participants for application-to-application (also known as system-to-system) communications (User Interfaces do not use AEMO-supplied TLS certificates).

The Gas Supply Hub FRC, also known as the FRC Hub (Gas Retail B2B, and B2M, traffic using ebXML) requires the use of TLS certificates to authenticate through AEMO's network.

The eHub, also known as the Energy Hub, also requires the use of TLS certificates to authenticate through AEMO's network.

Back in June 2023, AEMO implemented the current TLS version 1.2 certificates and the selfservice certificate management tool to manage the AEMO supplied TLS certificates.

These changes were reflected in the gas retail market Technical Protocol (TP) documents.

AEMO will soon move to next version (1.3) of the TLS certificate which will require updating the TP documents. AEMO notes that updating the TP documents for each new release of TLS certificates is not the most efficient use of its resources. AEMO is proposing to create a webpage that will contain all details about the TLS certificates required by participants to access AEMO's systems. This will require a one-time change to the TP documents to refer to the webpage about the TLS certificates. All subsequent updates to the TLS certificates will be reflected on the webpage only.

### 1.2. Pre-consultation outcomes

On 24 September 2024, a Gas Market Issue (GMI) that provided details about the proposal including drafting changes to the TP was submitted to the GRCF participants.

Submissions on this GMI closed on the 8 October 2024. AGL, AGN, Alinta, Multinet, Origin, Origin and Red/Lumo submitted feedback to the GMI supporting the proposal. Participant feedback and AEMO's response to the feedback has been included in Attachment C.

AGL's feedback noted the need for including the notification of upcoming TLS certificate version change in the Procedures. AEMO considers that this requirement is already included in the TP documents and that AEMO continues to support the previous version which should provide sufficient time for the participant to upgrade to the new version.

Having proposed removal of the reference to Connectivity Testing and Technical specification (WA Only) document from the AEMO Specification Pack document, AEMO proposes removal of the reference to AEMO Specification Pack in the Retail Market Procedures (RMP) WA. These changes are additional to those proposed in the GMI and have been added in Attachment A.

### 1.3. How to make a submission

Anyone wishing to make a submission for this pre formal consultation stage are requested to use the response template provided in Attachment B. Submissions close **COB 29 October 2024** and should be e-mailed to grcf@aemo.com.au.

IMPORTANT: The scope of works is limited to the initiatives described above. The scope maybe expanded to pick up other minor typographical errors that are identified. A more thorough review of the other sections of the TPs is out of scope for this consultation.

# 2. Reference documentation

Participant Build Pack 3 – System Specification v3.2 FRC B2M – B2B Hub System Specifications (WA Only) v4.0 Gas FRC B2B Connectivity Testing and Sys Certification v1.11 Retail Market Procedures (RMP) (Western Australia) v9.0 Gas Interface Protocol (Victoria) v29.0 Gas Interface Protocol (Queensland) v27.0 Gas Interface Protocol (NSW-ACT) v15.0 Specification Pack Usage Guide v8.8 Digital Certificate Webpage (this document contains the text for a new sub webpage on the current webpage TLSCertificateManagement (aemo.com.au))

Guidelines for Development of A Standard for Energy Transactions in XML (aseXML) v4.1 - Link

# 3. Overview of changes

The proposed changes are,

- In relation to TLS certificates:
  - Amend the TP documents Participant Build Pack 3 System Specification and FRC B2M – B2B Hub System Specifications to provide details about how a participant can determine the currently supported TLS certificate for connecting to AEMO systems.
  - Create a new sub webpage "TLS Certificate for connecting to FRC HUB" on the webpage <u>TLSCertificateManagement (aemo.com.au)</u> after the sub webpage titled "CSR Requirements".

- In relation to the other minor amendments:
  - Fix the text of the heading for section 5.3 in Participant Build Pack 3 System Specification. The body text from section 5.2 accidently became the heading for section 5.3.
  - Amend the link for the Form of AEMO Certification Checklist to the current checklist in Gas FRC B2B Connectivity Testing and Sys Certification document.
  - Amend the GIP documents for VIC, QLD and NSW/ACT to remove the reference to 'Guidelines for Development of a Standard for Energy Transactions in XML (aseXML)'.
  - Amend the AEMO Specification Pack document to remove reference to 'Connectivity Testing and Technical Certification (WA Only)'.
  - Amend the RMP WA to remove reference to the AEMO Specification Pack in the definition for fields 'FRC Hub certification criteria' and 'FRC Hub certification process' and also in clause 21A(4) since the reference to Connectivity Testing and Technical Certification (WA Only) document is proposed to be removed from the AEMO Specification Pack.

# 4. Likely implementation requirements and effects

AEMO to create a webpage that provides the current status of TLS certificate and the requirements for AEMO to notify GRCF when there is going to be a new version of the TLS certificate.

Participants will need to transition over to the latest certificate as soon as they can.

# 5. Impact of issue not proceeding

For each TLS certificate upgrade to change the version number, AEMO and the participants will need to allocate resources to carry out the formal GRCF consultation which could be better utilised for other more important activities.

Where a participant chooses to not upgrade to the latest version of the TLS certificate may miss out on the latest security features.

# 6. Overall cost, benefits and magnitude of the changes

AEMO expects there will be negligible implementation costs since none of the changes proposed in this PPC require substantial process changes and considers this change to be non-material. If a participant believes that any of the proposed changes are material, this feedback needs to be included in the Attachment B response template. For AEMO and the participants, this will result in improved efficiency as a formal GRCF consultation will not be required for future upgrades to the TLS certificate.

This will provide a central location for all information related to TLS certificate.

Harmonisation across all jurisdictions in GIP and Specification Pack documents.

# 7. Consistency with the National Gas Rules (NGR) and National Gas Objective (NGO)

Regarding these changes, AEMO's preliminary assessment of the proposal's consistency with the NGR and NGO is:

Requirement	AEMO's Preliminary Assessment
Consistency with National Gas Law (NGL) and NGR	AEMO's view is that the proposed change is consistent with the NGL and NGR because the proposed changes properly reflect operational practices and promotes consistency across the jurisdictions.
National Gas Objective (NGO)	As outlined in Section 6, it is AEMO's view that this change removes any costs associated with unnecessary differences in process and procedures and is in the long-term interests of consumers as it promotes clarity and consistency for gas retail market participants
Any applicable access arrangements	AEMO's view is that the proposed change is not in conflict with existing Access Arrangements.

If any participant believes that any of the above AEMO views are contentious, this feedback needs to be included in the Attachment B response template.

# 8. AEMO's preliminary assessment of the proposal's compliance with clause 378 of the RMP WA

Regarding the changes in WA, AEMO's preliminary assessment of the proposal's compliance with clause 378 of the RMP (WA) is:

Requirement	AEMO's Preliminary Assessment
Ensure that the retail gas market operates and is governed in a manner that is, (i) open and competitive; (ii) efficient; and (iii) fair to participants and their customers	AEMO's view is that the proposed change will continue to promote competition, properly reflects operational practices and will not disadvantage participants or their customers.
Ensure compliance with all applicable laws	AEMO's view is that the proposed changes are consistent with the applicable laws, and participants will be given an opportunity during this PPC consultation to inform AEMO if they believe the proposed change is in conflict with any applicable laws.

Requirement	AEMO's Preliminary Assessment
Ensure effective consultation occurs and gives stakeholder's opportunities to provide feedback of the proposed changes	AEMO's view is that this PPC consultation and the subsequent IIR consultation, in addition to the discussions at the GRCF, will provide adequate opportunities for participants to provide feedback on the proposed changes.

If any participant believes that any of the above AEMO views are contentious, this feedback needs to be included in the Attachment B response template.

# 9. Supporting Documentation

Attachment A Proposed Changes to TP documents.

Attachment B PPC Response Template.

# 10. Proposed timelines

Subject to all necessary approvals, AEMO is targeting to implement this change by 3 March 2025.

To achieve this timeline, AEMO proposes the following key milestones:

- Issue PPC on 15 October 2024
- Submissions on PPC close 29 October 2024
- Issue Impact and Implementation Report (IIR) on 5 November 2024
- Submission on IIR close 3 December 2024
- ERA submission issued 20 December 2024
- ERA decision expected TBA

- Publish AEMO decision (east coast only) 6 January 2025
- Target effective date 3 March 2025

# **Attachment A – Documentation Amendments**

Excerpts from draft versions of the RMP and or Technical Protocols showing tracked changes between the current version and the proposed changes are shown below. <u>Blue underline</u> means addition and <del>red strikeout</del> means delete.

## **Retail Market Procedures – Western Australia**

#### 2. Definitions

aemo.com.au

FRC·Hub· certification·criteria¤	means the criteria specified in the Connectivity Testing and Technical Certification document within the AEMO Specification Pack. <sup>x</sup>	¤
FRC·Hub· certification·process¤	means the testing process set out in the Connectivity Testing and Technical Certification document within the <u>AEMO Specification Pack</u> to ensure that a person's information system complies with the requirements of the FRC Hub Operational Terms and Conditions.¤	¤

#### 21A.·FRC·Hub·certification¶

- (1) → Each · person · required, · or · who · has · agreed, · to · comply · with · some · or · all · of · these · procedures · (as · applicable), · must · participate · in · the · FRC · Hub · certification · process · and · must · satisfy · the · FRC · Hub · certification · criteria · prior · to · the · date · they · are · required · to · comply · with · these · procedures · ¶
- (2) → Prior to AEMO issuing a GBO identification under clause 22(2), AEMO must determine as a reasonable and prudent operator whether a person referred to under clause 21A(1) has satisfied the FRC Hub certification criteria.¶
- $(3) \rightarrow Upon \cdot satisfaction \cdot of \cdot the \cdot FRC \cdot Hub \cdot certification \cdot criteria \cdot under \cdot clause \cdot 21A(2), \cdot AEMO \cdot must \cdot issue \cdot a \cdot FRC \cdot Hub \cdot compliance \cdot certificate \cdot to \cdot the \cdot person.$
- (4) → AEMO·may·immediately·cancel·a·FRC·Hub·compliance·certificate·if,·in·AEMO's· opinion·as·a·reasonable·and·prudent·person·and·having·regard·to·the·FRC·Hub· certification·criteria, the holder of the FRC·Hub·compliance·certificate·breaches·its· obligations·under·the·FRC·Hub·Conditions·and/or·the·Connectivity·Testing·and· Technical·Certification·document·within·the·AEMO·Specification·Pack·in·such·a· manner·that·the·integrity·of·the·FRC·Hub·is·jeopardised.··¶

## Participant Build Pack 3 – System Specification

### • 5.2. → Obtaining certificates¶

Obtaining·X509·certificates·for·use·with·TLS·and·digital·signatures·in·the·FBS·is·achieved·by· following·the·TLSCertificateManagement·(aemo.com.au)·online-instruction.¶

# 5.3. → Obtaining X509 certificates for use with TLS and digital · signatures in the FBS is achieved by following the · <u>TLSCertificateManagement (aemo.com.au)</u> online instruction · {Placeholder TBA}. FRC Hub Security Services¶

In-order-to-solve-the-"many-to-many"-problem-with-regard-to-certificate-distribution-andrevocation, participants-in-the-FBS, the-hub-will-provide-security-services. For-each-environment---Pre-Production-and-production--participants-will-only-need-one-certificate--that-of-theapplicable-FRC-Hub-for-TLS-and-digital-signature-services. ¶

## • **5.4**. →**TLS**¶

• 1

The FRC Hub is capable of <u>TLS Certificates required for connection to AEMO Systems. TLS</u> connectivity in compliance with TLS v1.2. TLS v1.2 is based on RFC5296:

#### https://www.ietf.org/rfc/rfc5246.txt·¶

 $\label{eq:alpha} A \cdot table \cdot containing \cdot the \cdot supported \cdot protocols \cdot enabling \cdot connection \cdot to \cdot AEMO \cdot Systems \cdot can \cdot be found \cdot under \cdot the \cdot section \cdot 'Digital \cdot Certificate \cdot for \cdot connecting \cdot to \cdot FRC \cdot HUB' \cdot on \cdot AEMO \cdot webpage \cdot AEMO \cdot | \cdot Gas \cdot systems \cdot guides \cdot This \cdot webpage \cdot also \cdot contains \cdot information \cdot about \cdot the \cdot notification \cdot period \cdot AEMO \cdot is \cdot required \cdot to \cdot give \cdot to \cdot GRCF \cdot participants \cdot when \cdot AEMO \cdot intends \cdot to \cdot introduce \cdot a \cdot new \cdot protocol \cdot \P$ 

The participants will update their certificates via the self-service certificate management.

The certificates used in the FBS will not employ any extensions. Sometimes these certificates extensions are referred to as server certificates by certain vendors. Certificates without extensions are sometimes referred to as client certificates by certain vendors. ¶

## FRC B2M – B2B Hub System Specifications

## • 5.2. → Obtaining certificates¶

Obtaining·X509·certificates·for·use·with·TLS·and·digital·signatures·in·the·FBS·is·achieved·by·following·the·<u>TLSCertificateManagement·(aemo.com.au)</u>Manage·TLS·Certificates·online·instruction-{Placeholder·TBA}. ·¶

### • 5.4. →TLS¶

• 1

The FRC Hub is capable of <u>TLS Certificates required for connection to AEMO Systems.</u> <u>connectivity in compliance with TLS TLS 1.2. TLS is based on RFC5246</u>:

A-table-containing-the-supported-protocols-enabling-connection-to-AEMO-Systems-can-befound-under-the-section-'Digital-Certificate-for-connecting-to-FRC-HUB'-on-AEMO-webpage-AEMO-[-Gas-systems-guides.-This-webpage-also-contains-information-about-the-notificationperiod-AEMO-is-required-to-give-to-GRCF-participants-when-AEMO-intends-to-introduce-a-newprotocol.-¶

The participants will update their certificates via the self-service certificate management.

•https://www.ietf.org/rfc/rfc5246.txtThe·certificates·used·in·the·FBS·will·not·employ·any· extensions.·Sometimes·these·certificates·extensions·are·referred·to·as·server·certificates·by· certain·vendors.·Certificates·without·extensions·are·sometimes·referred·to·as·client·certificates· by·certain·vendors.¶

## Gas FRC B2B Connectivity Testing and Sys Certification

# Appendix · E · – · Form · of · AEMO · Certification · Checklist¶

Checklist·attached·can·be·accessed:·¶ <u>http://www.aemo.com.au/Gas/-</u> <u>/media/F51E518A3AE146B89A529CA68822FFAC.ashx</u>·¶ <u>https://aemo.com.au/-/media/files/gas/it\_systems/gas-frc-certification-</u> <u>checklist.docx?la=en</u>¶

## **Gas Interface Protocol (Victoria)**

# Gas Interface Protocol artefacts to take effect as of ← <u>1-May-2024</u><u>3-Mar-2025</u>.¶

REQUIREMENT¤	DOCUMENTS¤	VERSION¤	
Retail·Market∙ Procedures∙¤	Retail·Market·Procedures·(Victoria)·¤	18.0·(authorised· under·the·NGL·and· NGR·effective)¤	
Participant⋅Build⋅Pack⋅ 1¤	Process·Flow·Table·of·Transactions··· This·contains:·Table·of·Transactions,·Table·of· Elements,·List·of·Job·Enquiry·Codes,·Address· Elements·and·MIRN·and·Meter·states.¤	4.0¤	
	Process·Flow·Diagrams··¤	3.9¤	
	CSV·Data·Format·Specification··¤	3.8¤	
Participant·Build·Pack· 2¤	Participant·Build·Pack·2·Interface·Definitions··¤	3.6¤	
Zm	Participant·Build·Pack·2·Usage·Guide···¤	3.1¤	
	Participant·Build·Pack·2·Glossary·¤	3.1¤	
Participant·Build·Pack· 3¤	Participant·Build·Pack·3·FRC·B2B·System· Specification·¤	3.2¤	
	Participant·Build·Pack·3·FRC·B2B·System· Architecture·¤	3.3¤	
	Participant·Build·Pack·3·Interface·Definitions··¤	4.0¶ ¶ ¤	
Guidelines-for· Development-of·A· Standard-for-Energy· Transactions-in-XML· (aseXML)¤	The Guidelines for Development of A Standard for Energy Transactions in XML (aseXML) which participants have subscribed to for Victorian Gas is available from www.aemo.com.au/asexml	4.1¤	

## **Gas Interface Protocol (Queensland)**

## Gas·Interface·Protocol·artefacts·to·take·effect·as·of·← <u>1·May·2024</u><u>3·March·2025</u>.¶

GIP·ltem·#¤	#¤ Category·¤ Documents¤		Version¤
1¤	Retail·Market·Procedures· (Queensland)¤	Queensland Retail Market Procedures a	2 <mark>1</mark> 2.0∙¤
2¤	Participants·Build·Pack·4¤	The Queensland Specific Participant Build Pack 4 · ¤	1 <mark>42</mark> .0¤
3¤	Deleted¤	¤	¤
4¤ Participant·Build·Pack·1¤ AEMO·F Element		AEMO Process Flow Table of Transactions This contains: Table of Transactions, Table of Elements, List of Job Enquiry Codes, Address Elements and MIRN and Meter states.¤	4.0¤
5¤	Participant·Build·Pack·1¤	Process·Flow·Diagrams·¤	3.9¤
6¤	Participant·Build·Pack·1¤ CSV·Data·Format·Specification·¤		3.8¤
7¤	Participant·Build·Pack·2¤	Participant·Build·Pack·2·Interface·Definitions·¤	3.6¤
8¤	Participant·Build·Pack·2¤	Participant·Build·Pack·2·Usage·Guide·¤	3.1¤
9¤	Participant·Build·Pack·2¤	Participant·Build·Pack·2·Glossary·¤	3.1¤
10¤	Participant·Build·Pack·3¤	FRC·B2B·System·Specification·¤	3.2¤
11¤	Participant·Build·Pack·3¤	FRC·B2B·System·Architecture·¤	3.3¤
12¤	Participant·Build·Pack·3¤ Interface·Definitions·¤		4.0¤
43¤ Guidelines for Development of A-Standard for Energy Transactions in XML (aseXML)¤		The-Guidelines-for-Development of A-Standard for-Energy-Transactions-in-XML-(aseXML) which-participants-have-subscribed-to-for Victorian-Gas-is-available-from http://www.aemo.com.au/asexml/·¤	4.1¤

## Gas Interface Protocol (NSW-ACT)

# Gas ·Interface · Protocol · artefacts · to · take · effect · as · of · ← <u>31 · March · 2023</u> <u>3 · March · 2025</u>¶

GIP·Item·#¤	Category⋅¤	Documents¤	Version¤	¤
1¤	Retail·Market·Procedures· (NSW/ACT)¤	NSW/ACT·Retail·Market·Procedures·¤	<mark>29<u>30</u>.0¤</mark>	¤
2¤	Participants·Build·Pack·5¤	The NSW/ACT specific Participant Build Pack 5 <sup>, p</sup>	<u>9</u> 8.0¤	¤
3¤	Participants·Build·Pack·6¤	The·NSW/ACT·Wagga·Wagga <sup>¶</sup> ··and·Tamworth· specific·Participant·Build·Pack·6·¤	<u>7</u> 6.0¤	¤
4¤	Guidelines-for-Development-of- A-Standard-for-Energy- Transactions-in-XML-(aseXML)¤	The-Guidelines-for-Development-of-A-Standard- for-Energy-Transactions-in-XML-(aseXML)- which-participants-have-subscribed-to-for- NSW/ACT-Gas-is-available-from- http://www.aemo.com.au/About-the- Industry/Information-Systems/aseXML- Standards/aseXML-Guidelines <sup>¤</sup>	4 <u>.</u> 1¤	¤

## **Specification Pack Usage Guide**

## ■ 2.→Overview of the AEMO Specification Pack¶

#### ¶

#### $\P_{-}$

Main∙ Directory¤	Sub-Directory¤	Documents¤	Version¤	¤
Specification <sup>.</sup> Pack¤	1.·Usage·Guidelines¤	Specification Pack Usage Guidelines¤	¤ <mark>9</mark> 8.8	a
	2. ·Interface ·Control · Document ·(ICD)¤	Interface Control Document ¤	5.3 <u>4</u> ¤	¤
	3.⋅B2B⋅System⋅ Interface⋅Definitions¤	FRC·B2B·System·Interface· Definitions¤	5.2 <u>3</u> ¤	a
	4.·Transport·Layer¤	FRC·B2M-B2B·Hub·System· Specifications·(WA·only)¶	4.0¶ ¶	¤
		FRC·B2M-B2B·Hub·System· Architecture·(WA·only)¶	3.7¶ ¤	
		For·SA·see·Participant·Build· Pack·3·–·FRC·B2B·System· Specification¶		
		For·SA·see·Participant·Build· Pack·3·–·FRC·B2B·System· Architecture¤		
	5.·CSV·File·Format¤	FRC·CSV·Data·Format· Specification¤	3.3¤	a
	6. Connectivity and Technical Certification (WA-Only)¤	Connectivity-Testing-and- Technical-Certification-(WA- Only)¤	<del>3.8</del> ¤	¤

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## **Digital Certificate Webpage**

Create a new sub webpage "TLS Certificate for connecting to FRC HUB" on the webpage <u>TLSCertificateManagement (aemo.com.au)</u> after the sub webpage titled "CSR Requirements"

The following is the new sub heading and text,

#### ++++++

#### **TLS Certificate for connecting to FRC HUB**

As described in section 5.4 of the Participant Build Pack 3 - FRC B2B System Specifications document and section 5.4 of the FRC B2M-B2B Hub System Specifications for the WA Gas Retail Market document the FRC HUB requires digital certificate connectivity. The following table contains a list of protocols including their version number, effective date and expiry date (if appliable).

Table 1.

Protocol	Version No	Effective Date	Expiry Date
Transport Layer Security (TLS)	1.3	1 Dec 2024 (Likely)	
TLS	1.2	1 Apr 2023	
TLS	1.1		1 Dec 2024
TLS	1.0		1 Dec 2024
Secured Socket Layer (SSL)			Expired

Participants are required to ensure currency of their TLS certificates needed to connect to AEMO Systems.

At least 90 business days prior to making any amendment to table 1, AEMO will inform the Gas Retail Consultative Forum (GRCF) or its successor of the proposed change to table 1. Any update to the expiry date will be at least 90 business days from the date that GRCF were informed of the expiry.

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# Attachment C – GMI Response for IN008/24 – TLS Certificate Update and TP Changes

#### Part A - General Comments on the proposal

Question	Ref #	Participant	Response	AEMO Response
1) In terms of the specific proposal and impacts of change (see section 4 and 5 of the GMI) for IN008/24 TLS Version Change does your organisation support the proposal as	1	AGL	AGL supports the changes. Maintaining a reference to a specific Certificate is an administrative burden. However, describing the process of Participant notification is a critical aspect of this change, as it is no longer driven by a consultation process.	AEMO notes AGL's support for the proposed changes and the notes the associated comment.
it is described in the GMI? If not, what changes need to be made?	2	AGN	AGN/APA supports the proposal.	AEMO notes AGN/APA's support for the proposed changes.
	3	Alinta	Alinta Energy supports the GMI, which proposes to amend the Technical Protocol (TP) documents and to create a webpage that will contain all details about Transport Layer Security (TLS) certificates.	AEMO notes Alinta's support for the proposed changes.
	4	Multinet	MGN IT has been consulted and supports the proposal.	AEMO notes MGN's support for the proposed changes.
	5	Origin	The proposed change is supported.	AEMO notes Origin's support for the proposed changes.
	6	Red/Lumo	Red Energy and Lumo Energy (Red and Lumo) support the proposal as described.	AEMO notes Red/Lumo's support for the proposed changes.
2) Do you support AEMO's proposal to make the Technical Protocol (TP)	7	AGL	AGL supports the changes.	AEMO notes AGL's support for AEMO's proposal.



Question	Ref #	Participant	Response	AEMO Response
documents agnostic to version number of the TLS certificate?	8	AGN	AGN/APA supports the proposal.	AEMO notes APA/AGN's support for AEMO's proposal.
If not then please provide the reason for not supporting it.	9	Alinta	Alinta Energy supports the proposal to make the TP documents agnostic to the TLS certificate version. This will improve efficiency by removing the requirement for formal consultation for future TLS certificate updates.	AEMO notes Alinta's support for AEMO's proposal.
	10	Multinet	MGN IT has been consulted and supports the proposal.	AEMO notes MGN's support for AEMO's proposal.
	11	Origin	The proposal is noted.	AEMO notes Origin's comment.
	12	Red/Lumo	Red and Lumo support the proposal to make the TP documents version agnostic.	AEMO notes Red/Lumo's support for AEMO's proposal.
3) Do you support AEMO's assessment of this proposal as	13	AGL	AGL Supports the proposal	AEMO notes AGL's support for AEMO's assessment.
described in the GMI including AEMO proposal that the Guidelines for Development of A Standard for	14	AGN	AGN/APA supports the proposal.	AEMO notes APA/AGN's support for AEMO's assessment.
Energy Transactions in XML (aseXML)' be removed from the VIC,	15	Alinta	Yes, we support	AEMO notes Alinta's support for AEMO's assessment.
QLD and NSW/ACT GIP?	16	Multinet	MGN supports the proposal	AEMO notes MGN's support for AEMO's assessment.
	17	Origin	The proposal is noted.	AEMO notes Origin's comment.
	18	Red/Lumo	Red and Lumo support the proposal as described	AEMO notes Red/Lumo's support for AEMO's assessment.



Question	Ref #	Participant	Response	AEMO Response
4) Do you support AEMO's proposal to harmonise the Gas Interface	19	AGL	AGL Supports the proposal	AEMO notes AGL's support for AEMO's proposal.
Protocol (GIP) and Specification Pack by removing the references to the documents and 'Connectivity Testing and Technical Certification (WA Only)'.	20	Alinta	Yes, we support	AEMO notes Alinta's support for AEMO's proposal.
	21	Origin	The proposal is noted.	AEMO notes Origin's comment.
5) Do you have any further comments on any other sections of the GMI you wish to raise? If so, please provide further details.	22	AGL	AGL notes that the procedures are unclear on how Participants will be notified of changes to TLS certificates. Noting the importance of allowing adequate time for Participants to update and test new certificates, AGL considers this aspect of the process highly critical. AGL notes that the notification requirements are to be inserted onto a web page, however, this is not a procedure nor would it have the head of power associated with a procedural requirement. AGL considers that the basic framework for notification should be embedded in the procedure, while specific details can be contained on the web page. Areas of concern would be engagement with participants on an appropriate schedule for the certificate changeover to minimise impact on internal releases and market releases and ensure sufficient support and test staff are available.	AEMO notes AGL's comment. AEMO notes that the requirement to notify participant is included in the TP documents as ' <i>This webpage also</i> <i>contains information about the</i> <i>notification period AEMO is required to</i> <i>give to GRCF participants when AEMO</i> <i>intends to introduce a new protocol</i> '. AEMO also notes that whenever a new version of the security certificate is introduced, the version just before it continues to be supported. This will allow the participant sufficient time to organise upgrade to the latest version.



#### Part B – Feedback on the documentation changes

		Digital Certificate Webpage							
Ref #	Organisatio n	anisatio Clause # Issue / Comment		Proposed text Red strikeout means delete and blue underline means insert	AEMO Response (AEMO only)				
23	Alinta	Table 1	The Effective Date of TLS ver 1.3 is given as 1 Dec 2024 (likely). If participants are required to move from ver 1.2 to ver 1.3 at that time, we request a delay in the upgrade to late Jan /Feb 2025.		AEMO notes Alinta's comment. AEMO also notes that whenever a new version of the security certificate is introduced, the version just before it continues to be supported. This will allow the participant sufficient time to organise upgrade to the latest version.				
		Retail Market Procedure – Western Australia							
Ref #	Organisatio n	Clause #	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response (AEMO only)				
24	AEMO	2 and 21A(4)	Having proposed removal of the reference to Connectivity Testing and Technical specification (WA Only) document from the AEMO Specification Pack document, AEMO proposes removal of the reference to AEMO Specification Pack in RMP WA.	within the AEMO Specification Pack	AEMO has removed the reference to AEMO Specification Pack in the definition for fields 'FRC Hub certification criteria' and 'FRC Hub certification process' and also in clause 21A(4).				