



# Proposed Procedure Change (PPC) -2024 Package 1 Gas Retail Market B2B changes

<b>Ref# (if applicable)</b>	2024 Package 1 B2B changes (IN002/22, IN004/22 and IN005/24) including the adoption aseXML schema version greater than r44 and GasEnumerations.xsd version greater than 1.0		
<b>Impacted jurisdiction(s)</b>	All (for WA except IN005/24)		
<b>Proponent</b>	AEMO	<b>Company</b>	AGL and Jemena
<b>Proponent email</b>	<a href="mailto:grcf@aemo.com.au">grcf@aemo.com.au</a>		
<b>Affected Gas Market(s)</b>	Retail		
<b>Date proposal published by AEMO</b>	6 December 2024	<b>Date proposal sent to AEMO</b>	IIN002/22 – 21/10/2021, IN004/22 – 28/10/2021, IN005/24 - 1/02/2024.
<b>Short issue title</b>	Business-to-Business (B2B) changes (Read Est/Sub Codes (IN002/22) and Network Tariff (IN004/22) including adoption of aseXML schema greater than r44 and the adoption of the GasEnumerations.xsd version greater than 1.0. For East Coast retailers only, the scope of works includes adding the contacted Maximum Daily Quantity (MDQ) value in the Retail of Last Resort transaction (RoLR) T1010 (IN005/24).		
<b>Procedure(s) or Documentation impacted</b>	Please refer to Section 3		
<b>Other key contact information</b>	<a href="mailto:Louise.Webb@aemo.com.au">Louise.Webb@aemo.com.au</a>		

Version #	Presented to	Date
1.0	GRCF	6 December 2024

# Proposed Procedure Change (PPC) – Detailed Report Section

## Critical Examination of Proposal

### 1. Description of issue and submission details

#### 1.1. Background

In December 2023 the GRCF endorsed AEMO's proposed 2024 Gas Retail Work Program including 2024 Package 1 Business-to-Business (B2B)<sup>1</sup> changes to be released in 2025. The initial work package encompassed:

- IN001/24: Updates to Gas Retail Address field lengths & Enumerated values
- IN002/22: Gas Scheduled Read Est Sub Codes and Special Read No Access Enumerations
- IN005/24: Inclusion of Contract Maximum Daily Quantity (MDQ) in Gas Retail of Last Resort (RoLR) Transaction Customer and Site Details from Failed Retail Business (FRB) to RoLR (T1010)

Gas Market Issues (GMI) for each of the initiatives were prepared by the respective proponents.

Between April to November 2024, AEMO in collaboration with participants undertook a detail reviewed of the initiatives<sup>2</sup>. This pre-consultation review resulted in the preparation of detailed interface requirements. The review also identified that new version of the aseXML schema would be required in order to realise the potentially improvement opportunity. The review process also included an indicative evaluation assessment to determine if the overall benefits outweighed the overall costs to implement. Section 6 of this PPC provide a summary of that evaluation.

In April 2024, the Gas Retail Consultative Forum (GRCF) endorsed Jemena's initiative IN004-22 (Proposed Improvements to Network Tariff B2B Notification) be included in the 2024 Package 1 B2B package of work.

At the GRCF meeting<sup>34</sup> held on 12th November 2024, AGL withdrew 'IN001-24 Updates to Gas Retail Address field lengths & Enumerated values' initiative predominantly due GRCF participants indicating benefits do not outweigh costs across East Coast and West Coast. The GRCF also confirmed that in relation to this 2024 Package 1 (gas retail market B2B changes) gas market participants need to have a aseXML schema version created and published without the electricity address aseXML schema changes in that version (indicatively r45). The electricity address aseXML schema changes plus any other electricity changes would be included in the subsequent version of the aseXML schema (indicatively r46).

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<sup>1</sup> Business-to-Business (B2B) means the interaction between Retailer and Distributor and vice versa.

<sup>2</sup> IN005-24 was excluded from this process as AEMO deemed that the change is straight forward as it requires adding one new field to a transaction that is hardly used and the delivery method is not via the FRC Hub.

<sup>3</sup> The GRCF meeting pack for the November 2024 meeting can be found [here](#)

<sup>4</sup> The GRCF meeting minutes for the November 2024 meeting can be found [here](#)

The initiatives in scope for this Proposed Procedure Change (PPC) are:

For all jurisdictions:

- IN002/22: Gas Scheduled Read Est Sub Codes and Special Read No Access Enumerations
- IN004/22: Proposed Improvements to Network Tariff B2B Notification – NSW/ACT.

Underpinning the above changes will be a requirement that all Retailers and Distributors must migrate to schema version greater than R44 concurrently.

For East Coast jurisdictions (Retailers only):

- IN005-24 - Inclusion of Contract MDQ in Gas RoLR Transaction Customer and Site Details from FRB to RoLR (T1010)

AEMO recommends that all the above changes, including the adoption of a schema version greater than R44 take effect in the period Q2 (April to June) 2026.

## 1.2. Description of issue for each initiative.

The following is a summary of each initiative that is part of the 2024 Package 1 program of work.

### 1.2.1. IN004/22 (NSW/ACT)- Proposed Improvements to Network Tariff B2B Notification

The proponent for this change is Jemena.

Currently, for the Network Section (NetworkID) owned Jemena Gas Networks (JGN) (NSW) Ltd (collectively known as ‘Jemena NSW gas networks’)<sup>5</sup> the allowable Distribution Tariffs are limited to just ‘Volume’ and ‘Demand’. JGN is contemplating to introduce a change to these tariffs from the next Access Arrangement period (1 July 2025). The proposal<sup>6</sup>, if approved by the Australian Energy Regulator (AER), results in new allowable tariffs (“Volume High” and “Volume Boundary”) being added to the current DistributionTariff list of enumerations. To enact a change of this nature the full schema change process is required.

A further enhancement to this proposal emerged during the detailed review of this initiative. The GRCF noted aseXML schema contains many type definitions that are constrained enumerations (i.e. are versioned in an aseXML version number, such as ‘r40’). These versioned enumerations can only be changed as part of the full schema change process, which can lead to long delays in the ability of gas retail market transactions to adapt to new market conditions such as new Distribution Tariff Code. Like the change that was implemented in 2021 whereby the Job Enquiry Codes (JEC) were moved into the GasEnumerations.xsd file, the GRCF endorsed a proposal to move the current DistributionTariff list of enumerations from the aseXML versioned file into non-versioned GasEnumerations file<sup>7</sup>.

Section 3 of this PPC contains further details about this change.

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<sup>5</sup> For further details about NSW/ACT Network Section please see section 4 of Participant Build Pack 5 which can be [here](#). See Technical Documents drop down list.

<sup>6</sup> Jemena Gas Networks (NSW) - Access arrangement 2025–30 proposal can be found [here](#).

<sup>7</sup> Enumerations file containing the Gas specific enumerations that can be added to at short notice and can be released outside of the standard aseXML change cycle. For further information see section 2.4 of the Guidelines for Development of A Standard for Energy Transactions in XML (aseXML) which can be found [here](#) and section 2.1 of the the ASWG Change Management Process which can be found [here](#)

### 1.2.2. IN002/22 - Gas Scheduled Read Est Sub Codes & Special Read No Access Enumerations.

The proponent for this change is AGL.

#### Scheduled Reads Codes

Scheduled Meter Read Substitution/Estimation **codes** are utilised in .csv transactions to identify where a network was unable to read a meter resulting in a substitution and/or estimation of a scheduled meter reading. The existing list of Scheduled Meter Read substitution and estimation codes used within the gas industry does not provide for all applicable reasons for a network being unable to read a meter. This limitation in available codes leads to poor information being provided to retailers, which in turn is passed on to customers and leads to additional communications being required between retailers and Networks to understand the actual cause.

#### Special Read Enumerations

Special Read No Access **enumerations** are utilised aseXML B2B transaction 'SpecialReadResponse' to identify where a network was unable to perform a Special Read. The existing list of Special Read No Access Enumerations are almost identical to the Scheduled Meter Read Substitution/Estimation **codes** and also do not provide for all applicable reasons for a network being unable to complete a Special Read.

A further enhancement to this proposal emerged during the detailed review of this initiative in relation to Special Read No Access enumerations. As noted in section 1.2.1 above, the same constrain issues about having to full schema change process emerged. Again, the GRCF endorsed a proposal to move the current Special Read No Access list of enumerations from the aseXML versioned file into non-versioned GasEnumerations file.

Section 3 of this PPC contains further details about this change.

### 1.2.3. IN005/24 - Inclusion of Contract MDQ in Gas RoLR Transaction Customer and Site Details from FRB to RoLR (T1010) - East Coast matter only

The proponent for this change is AGL. This is an East Coast initiative as WA has a different process to manage RoLR events.

This initiative was identified during the consultation for 2023 Package 5 – RoLR<sup>8</sup>. Because the initiative required B2B changes it was decided to move this into the 2024 Package 1 program of work.

When a gas retailer fails and a Retailer of last Resort (RoLR) event is called by AEMO issuing a Suspension Notice to the FRB, the customers of that failed retailer are moved to a RoLR Retailer who becomes responsible for the provision of gas for those customers.

One of the key pieces of information the new retailer needs to understand for the non-retail customers is the contracted quantity of gas the failed retailer was providing. Without this quantity, the RoLR is unable to establish appropriate supply contracts for the larger customers of the failed retailer resulting in substantial costs to the customer.

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<sup>8</sup> Click [here](#) to view the consultation paper for this RoLR program of work.

To resolve this information void, it is proposed new data element 'Contract MDQ' be added in the T1010 RoLR File in order to provide the contracted quantity of gas the failed retailer was providing. From an IT system perspective this change only impacts Retailers.

Section 3 of this PPC contains further details about this change.

### 1.3. How to make a submission and key feedback areas.

This PPC is designed to:

- Recommend East and West adoption of an aseXML schema uplift (greater than r44 version) and GasEnumerations.xsd file would realise a net benefit across Gas Retail Markets.
- Provide AEMO's costs, likely industry costs and benefits for the adoption of the initiatives described in this PPC.

The changes described in this PPC requires system changes for Retailers and Distributors. As such, AEMO seeks feedback from all Retailers and Distributors on the following:

1. Whether your organisation believes that this PPC accurately captures the requirements endorsed by the GRCF in GRCF #163 November 2024 meeting. If your organisation does not believe that AEMO has accurately captured all the proposed requirements, please provide details on which requirements specifically your organisation believes AEMO has not captured and why.
2. Whether you expect that the benefits described in section 4 will outweigh the costs described in section 6 for your organisation. Your feedback should include:
  - Details of the benefits for your organisation.
  - Whether your organisation believes that the costs will outweigh the benefits.
  - An order of materiality for the costs for your organisation.
3. Feedback on any other matters described in the PPC.
4. Whether your organisation agrees with the marked-up changes to the Technical Protocol (TP) documents described in Attachment C.

Anyone wanting to make a submission for this PPC consultation stage are requested to use the response template provided in Attachment A.

Submissions are due **COB Friday 10th January 2025** and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

**IMPORTANT NOTE:** The scope of works is limited to the initiatives described in this PPC. The scope maybe expanded to pick up other minor typographical errors that are identified. A more thorough review of the other clauses of the TP documents is out of scope for this consultation.

## 2. Reference material

### 2.1. Technical Protocol (TP) documentation

- Attachment B provides a detailed summary of the changes to each of the TP documents.
- Attachment C contains each TP document showing tracked changes between the current version and the proposed changes.

### 2.2. Schema Manifest r41 to r44

- Attachment D is an initial draft of this document. The purpose of this document is to provide a guide for schema releases r41 through r44. See section 4 (Likely implementation requirements and effects) of this PPC that provide important information on a particular release that has gas retail market impacts and therefore this impact should be factored into respective programs of works.

### 2.3. Schema release documentation

- Click [here](#) to view the AEMO webpage that contains an index of aseXML schema releases from r41 to r44 inclusive. At the time of preparing this PPC, the applicable aseXML version to be applied for this program is a work in progress. This information will be published on the same AEMO webpage mentioned above.

### 2.4. Previous Gas Retail B2B system changes program of work

- In late 2021 participants implemented several B2B changes that included the adoption of a new aseXML version (r40). Whilst the changes themselves are different some characteristics are very similar to this current program of works such as the moving a list of enumerations from the aseXML versioned file into non-versioned GasEnumerations.xsd file and the adoption of a new aseXML version. Click [here](#) to view the previous program of work that has similar characteristics .

### 2.5. Gas Retail Certification - Industry documentation and obligations

The Retail Market Procedures requires participants to certified by AEMO prior to using the FRC Hub. The following documents explains the criteria for certification and re-certification.

- Details about recertification process and obligation for Vic, QLD, SA and NSW/ACT can be found [here](#).
- Details about recertification process and obligation for WA can be found [here](#).

## 3. Overview of changes

### 3.1. Technical Protocol Changes

The following documents are being consulted on as part of this PPC. For each initiative, specific procedure updates are detailed below and tracked changed procedures provided in the Attachment B of this artefact.

AEMO has provided the PPC response template for participants to make their submissions in response to this consultation.

#### 3.1.1. IN004/22: Proposed Improvements to Network Tariff B2B Notification – NSW/ACT

To improve the efficiency of the operation of the gas market via more accurate retailer quotation and billing, and improve price and quality outcomes for consumers, the procedure changes in Attachment B in this artefact (track changed) are proposed.

#### 3.1.2. IN002/22: Gas Scheduled Read Est Sub Codes and Special Read No Access Enumerations

Involves consolidating Scheduled Meter Read Substitution/Estimation **codes** and Special Read No Access **enumerations** into a common list (detailed in Attachment B) so they can be selected by Distribution businesses across Industry,

the technical protocol changes in Attachment B in this artefact (track changed) are proposed.

#### 3.1.3. IN005/24 - Inclusion of Contract MDQ in Gas RoLR Transaction Customer and Site Details from FRB to RoLR (T1010) - East Coast matter only

To ensure provision of information in order to make establishing the supply contracts by the RoLR for the larger customers of the failed retailer substantially easier and saving these customers higher costed gas, the procedure changes in Attachment B in this artefact (track changed) are proposed.

## 4. Likely implementation requirements and effects

### 4.1. Requirements

As described in Section 1.1 (Background) of this PPC, AEMO in collaboration with participants undertook a detail reviewed of the initiatives IN004/22 and IN002/22. The review resulted in the creation of tracked changed version of the impacted TPs. At the November 2024 GRCF meeting, the GRCF supported AEMO's view that these tracked changed versions are proposed (see Attachment B). The GRCF also agreed AEMO recommendation that these document changes proceed to the formal consultation phase.

The following provides the requirements to modify AEMO and Participants system and business processes each of the initiatives<sup>9</sup> mentioned above:

- See Attachment B for summary of TP changes.
- See Attachment C for detailed of TP changes (tracked changed).
- See Attachment D for details of schema changes implemented since r40.

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<sup>9</sup> For the avoidance of doubt initiative IN001/24 is included.

- See Attachment E for details of transactions impacted.
- See Attachment F for summary of proposed aseXML schema and GasEnumerations.sxd version containing the updates for IN004/22 and IN002/22.

The AseXML Standards Working Group (ASWG) are the responsible party in relation to modifying and test of amendments to aseXML schema changes. The applicable versions will be published on AEMO website after these process steps are completed. At the time of preparing this PPC, this information is on track to be published in Q2 (April to June) 2025.

## 4.2. Noteworthy aseXML schema release between r41 to r44 that contains gas retail market impacts.

The R42 schema change (December 2021) introduced the following which do not impact Gas Retail Markets:

- LocationDescriptor field
  - 'LocationDescriptor' (LD) field length updated from 30 to 200 in ClientInformation r42.xsd.
  - AEMO Technical Protocols shall remain at LocationDescriptor Field Length = 30 and will NOT be updated.
  - AEMO will ensure Certification responders remain at field Length 30.
- New Address fields
  - New address fields created: HouseNumberTo, HouseNumberToSuffix, SectionNumber, DPNumber, GNAFPID.
  - New address fields added to existing AustralianAddress, AustralianPartialAddress, AustralianStructuredAddressPartialComponents and AustralianStructuredAddressComponents.
  - AEMO 'Participant Build Pack 1 Table of Transactions'/'Address Element' tab now includes clarification how to treat these new address fields.

Participants are expected to have configured their gateways/systems as per AEMO Technical Protocols.

Refer to Attachment E for potentially impacted transactions where 'LocationDescriptor' may be populated.

## 4.3. Effect on Retailers and Distributors

It is anticipated that **all Retailers and Distributors** will need to make the following incremental IT system changes:

- Modify gas gateways to send and receive transactions in the new aseXML schema version (which will be a version beyond r40).
- Incorporate the new and updated Scheduled Meter Read substitution and estimation codes and the Special Read No Access enumerations into gas retail market systems.
- For NSW Retailers and Distributors that participate in the Network Section (NetworkID) owned Jemena Gas Networks (JGN) (NSW) Ltd (collectively known as 'Jemena NSW gas networks') incorporate the new allowable Distribution Tariff 's being "Volume High" and "Volume Boundary" into gas retail market systems.



- Consider whether the changes to the impacted aseXML transactions warrant recertification<sup>10</sup>. Further information about timeline for the recertification window will be issued in Q2 2025.
- For east coast retailer<sup>11</sup>, need to modify their internal processes so that the new Contract MDQ field in the Gas RoLR Transaction Customer and Site Details from FRB to RoLR transaction (T1010) is included in this transaction. In the event of a RoLR the FRB is to populate that field is the Contact MDQ information if it is available.

For details about what transactions may be impacted are described in Attachment E.

## 4.4. Effect on AEMO

In terms of **AEMO's** external interfacing systems, it is anticipated that AEMO will need to make the following incremental IT system changes:

FRC Hub changes:

- AEMO to ensure that transactions are as per the new aseXML schema version (which will be a version beyond r40).

AEMO will need to make the following incremental IT system changes:

- Modify AEMO's gas gateways (including those managed by CGI, AEMO's outsourced service provider for NSW/ACT, SA, and WA) so they have the capability to send and receive new aseXML schema version (which will be a version beyond r40) transactions.
- Modify the aseXML schema transformation engine for Wagga Wagga and Tamworth network to support sending and receiving transactions in the new version format of the aseXML schema which will be a version beyond r40).
- Modify the NSW Low Volume Interface (LVI), so that the system can validate, send, and in in the new version format of the aseXML schema which will be a version beyond r40).
- Modify the WA Low Volume Interface that is managed by CGI so that this interface service will have the capability to send and receive new aseXML schema version transactions (which will be a version beyond r40).
- Modify the pre-production/certification environment responders to support the new aseXML schema version transactions whilst maintaining the r40 aseXML schema version of which can be deactivated post go-live.
- Complete a recertification process on all impacted transactions. Further information about timeline for the recertification window will be issued in Q2 2025.

## 4.5. Implementation timeframe

At the November 2025 GRFC meeting<sup>12</sup> AEMO indicated that industry should avoid having to implement an aseXML schema uplift for both gas and electricity within a similar release window. A simultaneous gas/electricity aseXML schema uplift has never been done. Currently electricity is anticipating an October

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<sup>10</sup> See the reference documents in section 2.5 of this PPC for further details about the recertification process.

<sup>11</sup> For Victorian and Queensland, host Retailers are excluded.

<sup>12</sup> The GRFC meeting pack for the November 2024 meeting can be found [here](#)

2025 deployment of an updated aseXML schema version for the Metering Services Review (MSR) Release 1 (System Changes)<sup>13</sup> changes.

Noting the above in relation to the implementation date, as discussed at the November 2024 GRCF meeting, AEMO is proposing that a date within **Q2 (April - June) 2026** be the effective date whereby these changes, including the adoption of the new aseXML schema version (beyond r44), becomes operational.

In relation to the AEMO's certification responders, noting the above implementation date, the certification responder changes are anticipated to be deployed in Q4 (Oct – Nov) 2025 which would allow Participants to undertake recertification testing in Q1 (Jan to Mar) 2026.

## 5. Impact of issue not proceeding

### 5.1. IN004/22: Proposed Improvements to Network Tariff B2B Notification – NSW/ACT

If this proposed change is not accepted, the incidence of incorrect quotation and invoicing by retailers to customers will increase, along with consequent corrective rework. JGN and Evoenergy would need to provide manual, accurate-at-point-in-time, off-market MIRN lists or information to retailers for the retailers to determine if the applicable distribution tariff is Volume (Individual), Volume High or Volume Boundary. There are currently ~ 1,000 Volume Boundary MIRNs and this number continues to grow each year. JGN expects there are ~14,000 MIRNs (~1% of the JGN MIRN base) with annual consumption of 200 GJ+ which would qualify for Volume High Distribution Tariff.

### 5.2. IN002/22: Gas Scheduled Read Est Sub Codes and Special Read No Access Enumerations

Gas retailers have had extended periods now years of skipped premises and routes with inadequate information as a result of gaps in the estimation / substitution codes, which has led to increased customer / ombudsman calls for an event outside their control and increased scrutiny from regulators which has had to be resolved using very manual processing to provide responses.

Networks, likewise, are struggling with events outside their control (such as pandemic, extreme weather) and are unable to clearly communicate these issues through the Scheduled Meter Read Substitution/Estimation codes and Special Read No Access enumerations and are having to spend more time responding to retailer queries and customer complaints.

### 5.3. IN005/24 - Inclusion of Contract MDQ in Gas RoLR Transaction Customer and Site Details from FRB to RoLR (T1010) - East Coast matter only

The lack of information will result in delays and higher costs for customers of the failed retailer while the customers contracted amount is established before a new supply contract can be established.

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<sup>13</sup> See slide 8 and 48 of the October 2024 NEM Reform Implementation Forum meeting pack which can be found [here](#)

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

### 6.1. Retailer and Distributor cost benefit evaluation

As described in section 1.1 of this PPC, the pre-consultation review process included an indicative evaluation assessment to determine if the overall benefits outweighed the overall costs.

**Benefits identified** during pre-consultation were:

For **IN004/22: Proposed Improvements to Network Tariff B2B Notification – NSW/ACT**

- a) Improve efficiency of the operation of the gas market via more accurate retailer quotation and billing.
- b) Improve price and quality outcomes for consumers by minimising the frustration from bills based on an incorrect distribution tariff which is not readily pre-discoverable before quoting and churn.
- c) Uplift Distribution Tariff enumerations from the aseXML schema into a non-versioned enumeration file (GasEnumerations) for ease of future updates. This is a broader benefit for both East Coast and WA participants as changes will mitigate the need to deploy a new aseXML schemas versions which is costly exercises.

For **IN002/22: Gas Scheduled Read Est Sub Codes and Special Read No Access Enumerations:**

- a) New and updated estimation / substitution codes and enumerations will enable networks and retailers to more efficiently identify issues arising from events outside their control (pandemic and weather) and assist in managing expectations with customers and regulators.
- b) Providing detailed Substitution and Estimation Usage descriptions will drive consistent use by networks leading to improved customer service and information quality to retailers and clearer understanding of estimation / substitution cause between network and retailers.
- c) Uplift of Special Read Response Substitution/Estimation enumerations from the aseXML schema into a non-versioned enumeration file (GasEnumerations) for ease of future updates. This change will mitigate the need to deploy a new aseXML schemas versions which is costly exercises.

In relation to IN005-24, the benefits mentioned below were provided in the GMI that was circulated to the GRCF in February 2024<sup>14</sup>.

**For IN005/24 - Inclusion of Contract MDQ in Gas RoLR Transaction Customer and Site Details from FRB to RoLR (T1010) – East Coast matter only:**

- a) The provision of this specific information will make establishing the supply contracts by the RoLR for the larger customers of the failed east coast retailer substantially easier and saving these customers' higher costed gas.

In relations **costs**, in September 2024 AEMO circulated a questionnaire to the GRCF inviting their participants to provide feedback about various aspect of the 2024 Package 1 program of work. One of the questions invited participants to comment on whether they expected the overall benefits of proposed changes<sup>15</sup> will outweigh the overall costs to implement the changes.

In terms of participants that participate in the **east coast** retail markets, most organisation supported the view that they anticipated that benefits would outweigh costs<sup>16</sup>. This outcome resulted in east coast retail markets participants recommending the proposal proceed to the formal consultation phase.

In terms organisation that participate in the **WA**, the position was less convincing because a couple of organisations felt that the costs would outweigh benefits. Not receiving a submission from the Network Operator complicated the evaluation process in respect to determine whether the proposal from a WA perspective was favourable in terms of benefits outweighing cost and whether the proposal proceed to the formal consultation phase. Having discussed these complexities pertaining to non-support and not receiving feedback at the GRCF November 2025 meeting, AEMO put forward a recommendation that the proposal proceed to the formal consultation phase noting if the current unfavourable position whereby the costs outweigh benefits prevailed the proposal would not proceed to the next consultation stage<sup>17</sup>. No participant opposed this recommendation.

## 6.2. AEMO's cost benefit evaluation

An indicative cost and benefit analysis in terms of the AEMO implementation has been undertaken. Costs are estimated to be \$0.75M to \$2.5M. There are no benefits from an AEMO perspective.

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<sup>14</sup> See GRCF Meeting 157 meeting pack which can be found [here](#)

<sup>15</sup> Proposed changes included IN004/22, IN002/24 and IN001/24

<sup>16</sup> It is important to note the favourable factor increased when initiative IN001/24 (Updates to Gas Retail Address field lengths & Enumerated values) was withdrawn by the proponent.

<sup>17</sup> For WA the next stage involves AEMO preparing an Impact and Implementation Report (IIR). See clause 382 of the WA RMP which can be found [here](#)

### 6.3. Magnitude of the changes

AEMO has deemed this change to be **material** because of the change to IT systems and the industry coordination effort required to uplift the aseXML schema to a schema version beyond r40. AEMO’s determination of a magnitude of material, is consistent with the 2021 gas B2B changes that also involved an aseXML schema change<sup>18</sup>.

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

Regarding the changes in east-coast jurisdictions, AEMO’s preliminary assessment of the proposal’s consistency with the NGR and NGO is:

Requirement	AEMO’s Preliminary Assessment
<b>1. Consistency with National Gas Law (NGL) and NGR</b>	AEMO’s view is that the proposed changes are consistent with the NGL and NGR because the proposed changes improve operational practices and promotes consistency across the jurisdictions.
<b>2. National Gas Objective (NGO)</b>	As outlined in Section 6, it is AEMO’s view that this change would facilitate efficient operation of the retail gas market by providing a cost-effective and improve business processes across east coast jurisdictions and is in the long-term interests of consumers.
<b>3. Any applicable access arrangements</b>	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 A 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
<b>1. Ensure that the retail gas market operates and is governed in a manner that is,</b> <ul style="list-style-type: none"> <li>• open and competitive;</li> <li>• efficient; and</li> <li>• fair to participants and their customers</li> </ul>	Based on the information that AEMO received during the pre-consultation process AEMO’s view is that the proposal hasn’t furnished sufficient evidence that demonstrates the proposal will delivery operational efficiency like those described in section 7 (requirement 2) for east coast participants and, on that basis, AEMO would not progress these changes. If the PPC feedback that AEMO receives reveals that benefits outweigh costs it is likely those delivery operational efficiencies described in section 7 (requirements 2) would be realised for WA.
<b>2. Ensure compliance with all applicable laws</b>	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.
<b>3. Ensure effective consultation occurs and gives stakeholder’s opportunities to provide</b>	In relation to timeline described in section 10 of this PPC, at the GRCF meeting held in November 2024 no participants opposed this timeline. AEMO’s view is that this PPC consultation, will provide adequate

<sup>18</sup> Information about the 2021 gas B2B changes can be found [here](#)

Requirement	AEMO's Preliminary Assessment
feedback of the proposed changes	opportunities for participants to provide feedback on the proposed changes.

It is important that WA participants note AEMO's assessment for requirement 1. If any WA participant believes that any of the above AEMO views are contentious, this feedback needs to be included in the Attachment A response template.

## 9. Supporting Documentation

Refer to attachment C for change-marked TPs and attachment D for Schema Manifest providing aseXML changes since version r40.

## 10. Proposed timelines

### 10.1. Consultation

Subject to all necessary approvals, AEMO is targeting to implement this change in Q2 (April - June) 2026

In order to achieve this timeline, AEMO proposes the following key milestones:

- PPC issued 6<sup>th</sup> December 2024
- PPC feedback closes 10<sup>th</sup> January 2025
- Impact and Implementation Report (IIR) issued 24<sup>th</sup> January 2025
- IIR feedback closes 21<sup>st</sup> February 2025
- For east-coast changes AEMO decision issued 11<sup>th</sup> April 2025
- For WA changes, Economic Regulation Authority (ERA) submission issued (TBA)
- ERA expected decision (TBA)

For east-coast changes AEMO proposes to issue a notice of effective date by the Q1 (Jan – Mar) 2026.

For WA changes, AEMO will work with ERA on the process to set an effective date for these changes.

### 10.2. Preparation for the system change.

As per previous gas changes that have required an uplift of the aseXML schema version, AEMO plans to hold an industry information session<sup>19</sup> with participants. The attendees for this session are made up of GRCF representative from each of the impacted organisations (Retailers and Distributor) and a technical lead from each of the impacted organisations (Retailers and Distributors) who is familiar with AEMO's TPs and the systems that interfaces with AEMO's FRC Hub. This timing of this session is anticipated to take place in Q3 (July – September) 2025.

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<sup>19</sup> Click [here](#) to view the 2021 industry information session that required an uplift of the aseXML schema version in relation to gas.

## Attachment A – PPC Response Template

The PPC response template has been attached separately to this document.

There are two sections in the template:

- Section 1 seeks feedback on AEMO’s examination of the proposed changes.
- Section 2 seeks feedback on the marked-up changes to the TP described in Attachments B.

Anyone wishing to make a submission to this PPC consultation are to use this response template.

Submissions close **COB Friday 10th January 2025** and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au)

## Attachment B – Technical Protocol reference documentation

The following table lists Technical Protocol (TP) documents that need to be amended. The table also contains a summary of the changes. Attachment C contains a draft version of the TPs showing tracked changes between the current version and the proposed changes.

Ref#	Technical Protocol	Initiative			Jurisdiction				
		IN004/22 (Net Tar)	IN002/22 (Sub/Est)	IN005/24 (RoLR) <sup>20</sup>	VIC	QLD	NSW/ACT	SA	WA
1	Participant Build Pack 1 – Process Flow Table of transactions		✓		✓	✓	✓	✓	✓
2	Participant Build Pack 1 - CSV Data Format Specifications		✓	✓	✓	✓	✓		
3	Participant Build Pack 2 – System Interface Definitions		✓		✓	✓	✓		
4	Participant Build Pack 3- B2B System Interface Definitions		✓		✓	✓	✓		
5	Gas Interface Protocol (Victoria)		✓	✓	✓				
6	Gas Interface Protocol (Queensland)		✓	✓		✓			
7	Participant Build Pack 5 - NSW-ACT	✓	✓				✓		
8	Gas Interface Protocol (NSW/ACT)	✓	✓	✓			✓		
9	FRC B2B System Interface Definitions (SA/WA)		✓	✓				✓	✓
10	Specification Pack Usage Guide (SA and WA)	✓	✓	✓				✓	✓

<sup>20</sup> East Coast only



Ref#	Technical Protocol	Current Ver #	Summary of changes
<b>The document below applies to all jurisdiction (For SA and WA its only new tab “Sched&amp;Special Codes&amp; Enum’ that applies)</b>			
1	Participant Build Pack 1 – Process Flow Table of transactions <i>Marked up showing differences between current version. See Attachment C</i>	4.0	<ol style="list-style-type: none"> <li>In relation to the “Element tab” in row 103 Estimation/Substitution Reason Code - remove all valid codes and add the text “ref to ‘Sched&amp;Special Codes&amp;Enum’ tab”. Note this change relates to IN002/22 (Sub/Est).</li> <li>In relation to the “Element tab” in row 248, ‘Reason for No Access by Meter Reader’ - remove all valid codes and add the text “ref to ‘Sched&amp;Special Codes&amp;Enum’ tab. Note this change relates to IN002/22 (Sub/Est).</li> <li>Create new tab in the spreadsheet called ‘Sched&amp;Special Codes&amp;Enum’. See Attachment C ref 1 for further details about the new codes. Note this change relates to IN002/22 (Sub/Est).</li> <li>In ‘Address Elements’ tab, new clarification the Address elements specified are the only aseXML address fields allowable in Retail Gas Markets.</li> </ol>
<b>The documents below applies to Vic, Qld and NSW/ACT</b>			
2	Participant Build Pack 1 - CSV Data Format Specifications <i>Marked up showing differences between current version. See Attachment C</i>	3.8	<ol style="list-style-type: none"> <li>In relation to section 7 (Data Dictionary) for the CSV Data Element Name ‘Estimation_Substitution_Reason_Code’ – Remove Allowed values and refer to new ‘Sched&amp;Special Codes&amp;Enum’ tab in PBP1 - Table of Transactions. Note this change relates to IN002/22 (Sub/Est).</li> <li>In relation to section 6.19 (Customer and Site Details from FRB to RoLR (T1010)) in Transaction 1010 ‘Customer and Site Details from FRB to RoLR’, add new field: <ul style="list-style-type: none"> <li>Field Name: Contract MDQ</li> <li>Mandatory/Optional: O</li> <li>Comment: Required if available</li> </ul> <p>Note this change relates to IN005/24 (RoLR).</p> </li> <li>In relation to section 7 (Data Dictionary) in Data Dictionary, add new field: <ul style="list-style-type: none"> <li>CSV Data Element Name: Contract MDQ</li> <li>Attribute/Format: Numeric</li> <li>Length/Decimal Places: 11,2</li> </ul> <p>Allowed Values/Comments: The agreed Maximum Daily Quantity of gas in Giga Joules (GJ) the Retailer needs to make available for sale to a customer, and the maximum quantity a customer can purchase per day at the customer’s contracted rates.</p> <p>Note this change relates to IN005/24 (RoLR).</p> </li> </ol>
3	Participant Build Pack 2 – System Interface Definitions <i>Marked up showing differences between current version. See Attachment C</i>	3.6	<ol style="list-style-type: none"> <li>In relation to section A2. (CSV Elements) for the CSV Column Designator ‘Estimation_Substitution_Reason_Code’ – Remove Allowed values and refer to new ‘Sched&amp;Special Codes&amp;Enum’ tab in PBP1 - Table of Transactions. Note this change. Note this change relates to IN002/22 (Sub/Est).</li> </ol>
4	Participant Build Pack 3- B2B System Interface Definitions	4.0	<ol style="list-style-type: none"> <li>In relation to section A1. (aseXML Data Elements) for the aseXML Element Name ‘ReasonForNoAccess’- Remove Allowed Value (i.e. enumerations) and refer to new</li> </ol>

Ref#	Technical Protocol	Current Ver #	Summary of changes
	<i>Marked up showing differences between current version. See Attachment C</i>		<p>'Sched&amp;Special Codes&amp;Enum' tab in PBP1 - Table of Transactions. Note this change relates to IN002/22 (Sub/Est).</p> <p>2. In relation to A2. (CSV Elements) for the CSV Element 'Estimation_Substitution_Reason_Code - Remove Allowed Value (i.e. enumerations) and refer to new 'Sched&amp;Special Codes&amp;Enum' tab in PBP1 - Table of Transactions. Note this change relates to IN002/22 (Sub/Est).</p>
<b>The document below applies to Vic</b>			
5	Gas Interface Protocol (Victoria) <i>Marked up showing differences between current version. See Attachment C</i>	29.0	<p>1. Update the version number for the changed artefacts mentioned above.</p> <p>2. Update the aseXML schema version beyond r44 (TBC).</p> <p>3. Updated the GasEnumerations.xsd version (TBC).</p>
<b>The document below applies to QLD</b>			
6	Gas Interface Protocol (Queensland) <i>Marked up showing differences between current version. See Attachment C</i>	27.0 <sup>21</sup>	<p>1. Update the version number for the changed artefacts mentioned above.</p> <p>2. Update the aseXML schema version beyond r44 (TBC).</p> <p>3. Updated the GasEnumerations.xsd version (TBC).</p>
<b>The documents below applies to NSW/ACT</b>			
7	Participant Build Pack 5 - NSW-ACT <i>Marked up showing differences between current version. See Attachment C</i>	8.0 <sup>22</sup>	<p>1. In relation to section 5.1 (Meter Reads – Energy and Consumption (Non Daily Read meters)) for the Element 'Estimation_Substitution_Reason_Code' – Remove reference to 'For NSW/ACT, this may include: 18 Customer bad read'. Note this change relates to IN002/22 (Sub/Est).</p> <p>2. In relation to section 12. Appendix – F (Table of Transactions – Elements) for the Element 'Estimation/Substitution Reason Code - Remove 'If Code Valid Values are:' Value (i.e. enumerations) and refer to new 'Sched&amp;Special Codes&amp;Enum' tab in PBP1 - Table of Transactions. Note this change relates to IN002/22 (Sub/Est).</p> <p>3. In relation to Appendix D (NSW/ACT Data Dictionary – ASEXML Elements) include reference to existing aseXML field 'DistributionTariff':</p> <ul style="list-style-type: none"> <li>• .aseXML Element Name: DistributionTariff</li> <li>• Table of Transactions Element Name: Distribution Tariff</li> <li>• Description: Part of the retailer request for standing data from the distributor</li> <li>• Attributes/Format: String</li> <li>• Length/Decimal Places: 20</li> <li>• Allowed Values/Comments: "Volume", "Demand"</li> </ul>

<sup>21</sup> The versioning numbers for this artefact will be updated on 3 March 2025 because of the 2023 Package 4 program of work

<sup>22</sup> The versioning numbers for this artefact will be updated on 3 March 2025 because of the 2023 Package 4 program of work

Ref#	Technical Protocol	Current Ver #	Summary of changes
			<p>For NSW/ACT only, additional values:</p> <p>“Volume High” – Customer with consumption of 200 GJ per annum or more</p> <p>“Volume Boundary” – customer with Volume Boundary gas meter</p> <p>Note1 - The inclusion of new row in this table is artefact remediation only. Only the 2 new NSW/ACT additional values are subject to schema change.</p> <p>Note2 - This change relates to IN004/22 (Network Tariff).</p>
8	Gas Interface Protocol (NSW/ACT) <i>Marked up showing differences between current version. See Attachment C</i>	15.0 <sup>16</sup>	<ol style="list-style-type: none"> <li>1. Update the version number for the changed artefacts mentioned above.</li> <li>2. Update the aseXML schema version beyond r44 (TBC).</li> <li>3. Updated the GasEnumerations.xsd version (TBC).</li> </ol>
<b>The documents below applies to SA and WA</b>			
9	FRC B2B System Interface Definitions (SA/WA) <i>Marked up showing differences between current version. See Attachment C</i>	5.2 <sup>17</sup>	<ol style="list-style-type: none"> <li>1. In relation to Appendix A. Data Dictionary, aseXML Data Elements aseXML Element Name ‘ReasonForNoAccess’- Remove Allowed Value (i.e. enumerations) and refer to new ‘Sched&amp;Special Codes&amp;Enum’ tab in PBP1 - Table of Transactions. Note this change relates to IN002/22 (Sub/Est).</li> <li>2. In relation to Appendix A. Data Dictionary, CSV Data Elements for CSV Element ‘Estimation_Substitution_Reason_Code - Remove Allowed Value (i.e. enumerations) and refer to new ‘Sched&amp;Special Codes&amp;Enum’ tab in PBP1 - Table of Transactions. Note this change relates to IN002/22 (Sub/Est).</li> <li>3. This is SA only change. In relation to appendix G (RoLR Process (SA only)) for transaction 1010 ‘Customer and Site Details from FRB to RoLR’, add new field: <ul style="list-style-type: none"> <li>• Field Name: Contract MDQ</li> <li>• Mandatory/Optional: O</li> <li>• Comment: Required if available</li> </ul> <p>Note this change relates to IN005/24 (RoLR).</p> </li> <li>4. This is SA only change. In relation to appendix A (CSV Data Elements) In Data Dictionary, add new field: <ul style="list-style-type: none"> <li>• CSV Field Name: Contract MDQ</li> <li>• Description: The agreed Maximum Daily Quantity of gas in Giga Joules (GJ) the Retailer needs to make available for sale to a customer, and the maximum quantity a customer can purchase per day at the customer’s contracted rates.</li> <li>• Attribute/Format: Numeric</li> <li>• Logical Length/Decimal Length: 11,2</li> <li>• Allowed Values: The agreed Maximum Daily Quantity of gas in Giga Joules (GJ) the Retailer needs to make available for sale to a customer, and the maximum quantity a customer can purchase per day at the customer’s contracted rates.</li> </ul> <p>Note this change relates to IN005/24 (RoLR).</p> </li> </ol>
10	Specification Pack Usage Guide (SA and WA)	8.8 <sup>17</sup>	<ol style="list-style-type: none"> <li>1. Update the version number for the changed artefacts mentioned above.</li> </ol>

Ref#	Technical Protocol	Current Ver #	Summary of changes
	<i>Marked up showing differences between current version. See Attachment C</i>		<ol style="list-style-type: none"><li>2. Update the aseXML schema version beyond r44 (TBC).</li><li>3. Updated the GasEnumerations.xsd version (TBC).</li></ol>

## Attachment C – Documentation Changes

Draft versions of the TPs showing tracked changes between the current version and the proposed changes are attached separately to this document. Blue underline means addition and ~~red-strikeout~~ means delete.

Please note a comment has been inserted and highlighted as per the following colour coding:

- **IN002/22: Gas Scheduled Read Est Sub Codes and Special Read No Access Enumerations**
- **IN004/22: Proposed Improvements to Network Tariff B2B Notification – NSW/ACT**
- **IN005/24 - Inclusion of Contract MDQ in Gas RoLR Transaction Customer and Site Details from FRB to RoLR (T1010)**

## **Attachment D – Schema Manifest r41 to r44**

The Schema Manifest r41 to r44 document (draft) has been attached separately to this document.

## Attachment E – Impacted transactions

Having undertaken a holistic review of all retail market technical protocol artefacts, the following is a list containing impacted transactions. No B2M transactions are impacted.

Please note that this is AEMOs preliminary assessment only. Given these transactions are B2B in nature, Participants should undertake their own due diligence of all retail market technical protocol artefacts to determine the accuracy of this list.

### List of transactions for IN002/22, IN004/22 and IN005/24:

IN002/22 - Gas Scheduled Read Est Sub Codes & Special Read No Access Enumerations			
Trans#	Transaction Name	Delivery method	B2B or B2M
6	Special Read Request No Access Advice	aseXML	B2B
9	Energy Flow for Special Read (Not Customer Transfer)	aseXML (CSV file embedded)	B2B
13	Energy Flow for Special Read for a Customer Transfer	aseXML (CSV file embedded)	B2B
17	Energy Flow for Disconnection Read	aseXML (CSV file embedded)	B2B
31A	Energy Flow for Customer Own Read	aseXML (CSV file embedded)	B2B
41	Energy Flow for Schedule or Special Read	aseXML (CSV file embedded)	B2B
46	Energy History Response	CSV	B2B
50	Energy Flow for missing reads	aseXML (CSV file embedded)	B2B
51	Energy Flow for an Estimate Read	aseXML (CSV file embedded)	B2B
53	Energy Flow for a Substituted Read	aseXML (CSV file embedded)	B2B
246	Energy Flow Adjustment for RB	aseXML (CSV file embedded)	B2B
995	Estimated Energy Flow which is for 2nd Tier Site that has been transferred as a result of a RoLR event	aseXML (CSV file embedded)	B2B
2310	Non-daily Energy flow	aseXML (CSV file embedded)	B2B

IN004/22 (NSW/ACT)- Proposed Improvements to Network Tariff B2B Notification			
Trans#	Transaction Name	Delivery method	B2B or B2M
T281	NMIDiscoveryResponse	aseXML	B2B
T284	NMIStandingDataResponse	aseXML	B2B

IN005/24 - Inclusion of Contract MDQ in Gas RoLR Transaction Customer and Site Details from FRB to RoLR (T1010) - East Coast matter only			
Trans#	Transaction Name	Delivery method	B2B or B2M
T1010	Customer and Site Details from FRB to RoLR	CSV	B2B

### List of aseXML transactions for R42 'LocationDescriptor' (LD)

Refer to Schema Manifest r41 to r44, Attachment A.

## Attachment F – Proposed aseXML schema updates

The following table provides overview of proposed aseXML schema updates pertaining to Gas that AEMO with submit to the ASWG chair for their consideration.

Please note that this is AEMOs preliminary assessment only. Participants should undertake their own due diligence of the proposed changes to the retail market technical protocol to determine the accuracy of this list.

item#	Change description	Change type	IN#
1	Remove existing Special Read No Access (element name "ReasonForNoAccess") enumerations from aseXML Gas_r44 schema file	Enhancement	IN002/22
2	Remove existing DistributionTariff (element name "DistributionTariff") enumerations from aseXML Gas_r44 schema file	Enhancement	IN004/22
3	Insert existing Special Read No Access (element name "ReasonForNoAccess") enumerations removed from Gas_r40 schema file into GasEnumerations.xsd (Version 1.0)	Enhancement	IN002/22
4	Insert existing 'DistributionTariff' (element name "DistributionTariff") enumerations removed from Gas_r40 schema file into GasEnumerations.xsd (Version 1.0)	Enhancement	IN004/22
5	Update existing Special Read No Access (element name = "ReasonForNoAccess") enumerations: <ul style="list-style-type: none"> <li>Change "Locked and No Answer" to 'Locked Premises'</li> <li>Change "Savage Dog" to 'Dog on Premises'</li> <li>Change "'Can't Locate Meter'" to 'Cannot Locate Meter'</li> </ul>	Enhancement	IN002/22
6	Create new Special Read No Access (element name = "ReasonForNoAccess") enumerations: <ul style="list-style-type: none"> <li>Communications Fault</li> <li>Extreme Weather Conditions</li> <li>Hi/Low Failure Meter Capacity Failure</li> <li>Meter high / ladder required</li> <li>Operational System Condition</li> <li>Quarantined Premises</li> <li>Remote Read Device Out of Alignment</li> <li>Remote Read Device Not Registering</li> <li>Resource Limitations</li> <li>Unsafe equipment / location</li> <li>Unable to Locate Premise</li> <li>Vacant Premise</li> </ul>	Enhancement	IN002/22
7	Create new 'DistributionTariff' (element name "DistributionTariff") enumerations: <ul style="list-style-type: none"> <li>Volume High</li> <li>Volume Boundary</li> </ul>	Enhancement	IN004/22