

**Consolidated list of comments with AEMO response**

Review comments submitted by: *Origin*

Date: 23/10/2013

Contact Person: *Malcolm Hempel*

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

Ref # in Attachment "A" of PPC.	Clause / Issue / Comment	Proposed revised RMP text <del>Red-strikeout</del> means delete and <u>blue underline</u> means insert	Rating <sup>1</sup> (H/M/L)	AEMO Response
22 Clause 12A (1) a	subject to clause 12(2), if transmitted by facsimile or delivered by hand before <i>close of business</i> on a the end of the <i>business day</i> , at the time of transmission or on the day of delivery (as applicable), or otherwise, at <i>start of business</i> on the commencement next <i>business day</i> ; or	subject to clause 12(2), if transmitted by facsimile or delivered by hand before <i>close of business</i> on a the end of the <i>business day</i> , at the time of transmission or on the day of delivery (as applicable), or otherwise, at <i>start of business</i> on the commencement <del>of the</del> next <i>business day</i> ; or	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
22 Clause 12A (4) b	otherwise, at <i>start of business</i> on the commencement next <i>business day</i> .	otherwise, at <i>start of business</i> on the commencement <del>of the</del> next <i>business day</i> .	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
22	Before the end of the <i>business day close of business</i> at the expiry of 2 full <i>business days</i>	Before <del>the end of the business day close of business</del> at the expiry of 2 full <i>business</i>	H	AEMO agrees with the change proposed and will include them in

<sup>1</sup> L = Low: - Not critical. Issues / Comments are minor. They add clarity to the document. No major concern if not included in any further revisions  
M = Medium: - Important. Strong case that issue / comments should be consider and an update to the document is desirable, but not critical.  
H = High – Critical. The issue / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

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Clause 36 (1)	<p>after the <i>process time</i> notified under clause 35(b)(ii)D or 35(b)(iii)C, a <i>participant</i> may lodge with AEMO an <i>error correction objection</i> on one or more of the following grounds:</p> <p>Before <del>close of business</del> at the expiry of 3 <i>full business days</i> after the <i>process time</i> notified under clause 38(b)(ii), a <i>participant</i> that lodged an <i>error correction objection</i> may lodge an <i>error correction objection withdrawal notice</i> with AEMO.</p>	<p><i>days</i> after the <i>process time</i> notified under clause 35(b)(ii)D or 35(b)(iii)C, a <i>participant</i> may lodge with AEMO an <i>error correction objection</i> on one or more of the following grounds:</p> <p>Before <del>close of business</del> at the expiry of 3 <i>full business days</i> after the <i>process time</i> notified under clause 38(b)(ii), a <i>participant</i> that lodged an <i>error correction objection</i> may lodge an <i>error correction objection withdrawal notice</i> with AEMO.</p> <p>Suggest the struck out text in clause 39 (1) is also struck out as it is consistent with clause 36 (1).</p>		the IIR consultation.
22 Clause 76 (2)	To avoid doubt, clause 76(1) only requires the <i>network operator</i> to use reasonable endeavours during <del><i>business hours</i></del> <i>day</i> to assist the <i>user</i> to determine a <i>delivery point's discovery address</i> or <i>MIRN</i> to enable the <i>user</i> to lodge a further <i>MIRN discovery request</i> in relation to the <i>delivery point</i> .	To avoid doubt, clause 76(1) only requires the <i>network operator</i> to use reasonable endeavours during <del><i>business hours</i></del> <u><i>the business hours</i></u> <i>day</i> to assist the <i>user</i> to determine a <i>delivery point's discovery address</i> or <i>MIRN</i> to enable the <i>user</i> to lodge a further <i>MIRN discovery request</i> in relation to the <i>delivery point</i> .	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
26 Clause 119	{Note: A <i>network operator's</i> obligation to <i>reconnect</i> a <i>delivery point</i> after receiving a valid request from a <i>user</i> to do so, is also set out in section 3.1 of the Distribution Code as issued by jurisdictional regulator for South Australia <i>ESCOSA</i> .	{Note: A <i>network operator's</i> obligation to <i>reconnect</i> a <i>delivery point</i> after receiving a valid request from a <i>user</i> to do so, is also set out in section 3.1 of the Distribution Code as issued by <del>the</del> <u>jurisdictional</u> regulator for South Australia <i>ESCOSA</i> .	H	AEMO agrees with the change proposed and will include them in the IIR consultation.

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(2)				
4 Definitions	<b>COU move-in meter read register</b> means the register created and maintained by the <del>registry operator</del> AEMO under <b>clause 6.5</b> .	<b>COU move-in meter read register</b> means the register created and maintained by <del>the registry operator</del> AEMO under <b>clause 6.5</b> .	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8 Definitions	for the purposes of <b>clause 6.8</b> , a <i>delivery point</i> at which the prior year's consumption, calculated by the <del>data estimation entity</del> AEMO using a methodology approved by <del>the Rules administrator</del> AEMO, was less than one terajoule. The methodology approved by - AEMO must require the use of historical data stored in the <i>GRMBS</i> .	for the purposes of <b>clause 6.8</b> , a <i>delivery point</i> at which the prior year's consumption, calculated by <del>the data estimation entity</del> AEMO using a methodology approved by <del>the Rules administrator</del> AEMO, was less than one terajoule. The methodology approved by <del>the Rules administrator</del> AEMO must require the use of historical data stored in the <i>GRMBS</i> .	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8 Definitions	if a change of user transaction in respect of a <i>RoLR affected delivery point</i> completes under <b>clause 6.17</b> after the date in paragraph <b>(1)</b> above and before the date on which the <del>registry operator</del> AEMO seeks to transfer the <i>RoLR affected delivery point</i> to the <i>designated RoLR</i> under <b>clause 13.4(1)</b> , the effective date of that change of user transaction under <b>clause 6.17(3)</b> .	if a change of user transaction in respect of a <i>RoLR affected delivery point</i> completes under <b>clause 6.17</b> after the date in paragraph <b>(1)</b> above and before the date on which <del>the registry operator</del> AEMO seeks to transfer the <i>RoLR affected delivery point</i> to the <i>designated RoLR</i> under <b>clause 13.4(1)</b> , the effective date of that change of user transaction under <b>clause 6.17(3)</b> .	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8c	<b>2.3 AEMO to maintain delivery point information immediately accessible</b> The AEMO must ensure that <i>delivery point information</i> for each <i>delivery point</i> included in the <i>delivery point registry</i> is maintained in an immediately accessible format for at least seven	<b>2.3 AEMO to maintain delivery point information immediately accessible</b> <del>The</del> AEMO must ensure that <i>delivery point information</i> for each <i>delivery point</i> included in the <i>delivery point registry</i> is maintained in an immediately accessible format for at least	H	AEMO agrees with the change proposed and will include them in the IIR consultation.

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	years. <b>2.4 AEMO to maintain delivery point information greater than 7 years old</b>  The AEMO must ensure that <i>delivery point information</i> for each <i>delivery point</i> included in the <i>delivery point registry</i> greater than 7 years old is maintained or archived in a format accessible within a reasonable period of time.	seven years. <b>2.4 AEMO to maintain delivery point information greater than 7 years old</b>  <del>The</del> AEMO must ensure that <i>delivery point information</i> for each <i>delivery point</i> included in the <i>delivery point registry</i> greater than 7 years old is maintained or archived in a format accessible within a reasonable period of time.		
8c	(2) As soon as practicable, but in any event not later than one <i>business day</i> after it has amended the <i>delivery point registry</i> under <b>clause 7.7(1)</b> , <del>the registry operator</del> AEMO must provide the transferee, the <i>relevant network operator</i> and <del>the Rules administrator</del> with a report setting out:	(2) As soon as practicable, but in any event not later than one <i>business day</i> after it has amended the <i>delivery point registry</i> under <b>clause 7.7(1)</b> , <del>the registry operator</del> AEMO must provide the transferee, <del>and</del> the transferor, the <i>relevant network operator</i> and <del>the Rules administrator</del> with a report setting out:	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8c	<b>9.5 Objection data to be addressed</b> By <i>day +4</i> , the <i>current user</i> must address each objection with the objecting participant and either: (1) the objecting participant must notify <del>the registry operator</del> AEMO that it withdraws the objection and the <del>registry operator</del> AEMO must:	<b>9.5 Objection data to be addressed</b> By <i>day +4</i> , the <i>current user</i> must address each objection with the objecting participant and either: (1) the objecting participant must notify <del>the registry operator</del> AEMO that it withdraws the objection and <del>the registry operator</del> AEMO must:	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8c	<b>16.3 Registry operator AEMO to provide bulk delivery point information</b> The <del>registry operator</del> AEMO will provide to each <i>market participant</i> on a daily basis, <i>delivery point information</i> for all <i>delivery points</i> for which the <i>market participant</i> is the <i>current user</i> (current as at the time and date that the list is generated by <del>the registry operator</del> AEMO) where there has been a	<b>16.3 Registry operator AEMO to provide bulk delivery point information</b> <del>The</del> <del>registry operator</del> AEMO will provide to each <i>market participant</i> on a daily basis, <i>delivery point information</i> for all <i>delivery points</i> for which the <i>market participant</i> is the <i>current user</i> (current as at the time and date that the list is generated by <del>the registry operator</del>	H	AEMO agrees with the change proposed and will include them in the IIR consultation.

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	change made to the <i>standing data</i> of that <i>delivery point</i> under <b>clause 8.1</b> .	AEMO) where there has been a change made to the <i>standing data</i> of that <i>delivery point</i> under <b>clause 8.1</b> .		
8c	<b>17.6 Statement of compliance with obligations under clause 17</b> (1) Each <i>user</i> (other than a <i>self-contracting user</i> or a <i>user</i> that has not received <i>DPI full listings</i> from the <del>registry operator</del> AEMO at any time during the relevant reporting period) must by 31 August in each year,...	<b>17.6 Statement of compliance with obligations under clause 17</b> (1) Each <i>user</i> (other than a <i>self-contracting user</i> or a <i>user</i> that has not received <i>DPI full listings</i> from <del>the registry operator</del> AEMO at any time during the relevant reporting period) must by 31 August in each year,...	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8a	<b>21.4</b> (3) <del>The data estimation entity</del> AEMO will provide to the <del>Rules administrator</del> prepare a monthly report that sets out by <i>network section</i> for daily metered delivery points; and <i>meter data agent, current user and meter reading frequency</i> for <i>non-daily metered delivery points</i> There is no clause 21.4 (3):	<b>21.4</b> (3) <del>The data estimation entity</del> AEMO will provide to the <i>Rules administrator</i> prepare a monthly report that sets out by <i>network section</i> for daily metered delivery points; and <i>meter data agent, and current user and meter reading frequency</i> for <i>non-daily metered delivery points</i> There is no clause 21.4 (3):	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8b	<b>26. CENTRAL INFORMATION AND FORECASTING</b> <b>26.1</b> By 0800h on each day, the <del>forecasting entity</del> AEMO must prepare and provide to <i>users</i> that have requested <i>forecasting information</i> under <b>clause 26.2(1)</b> as a minimum information and analysis in relation to the <i>market</i> including:  (2) The <del>forecasting entity</del> AEMO must prepare forecasts referred to in <b>clause 26.1(1)(b)</b> in accordance with an algorithm developed by the <del>forecasting entity</del> AEMO, the forecast accuracy of which must be consistent with the limit...	<b>26. CENTRAL INFORMATION AND FORECASTING</b> Delete 'the' before 'forecasting entity' in all clauses. E.g. <b>26.1</b> By 0800h on each day, <del>the forecasting entity</del> AEMO must prepare and provide to <i>users</i> that have requested <i>forecasting information</i> under <b>clause 26.2(1)</b> as a minimum information and analysis in relation to the <i>market</i> including:  (2) <del>The forecasting entity</del> AEMO must prepare forecasts referred to in <b>clause 26.1(1)(b)</b> in accordance with an algorithm developed by	H	AEMO agrees with the change proposed and will include them in the IIR consultation.

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		<del>the forecasting entity</del> AEMO, the forecast accuracy of which must be consistent with the limit...		
8a	<b>27.2 User to notify network operator</b> for the <i>nomination day</i> any <i>user reconciliation adjustment amount</i> that the <del>data estimation entity</del> AEMO has calculated	<b>27.2 User to notify network operator</b> for the <i>nomination day</i> any <i>user reconciliation adjustment amount</i> that <del>the data estimation entity</del> AEMO has calculated	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8a	<b>27.3 User to notify the <del>data estimation entity</del> AEMO of negative forecast requirement</b>	<b>27.3 User to notify <u>the data estimation entity</u> AEMO of negative forecast requirement</b>	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8a	<b>28.2 User to notify network operator</b> (d) for the <i>nomination day</i> any <i>user reconciliation adjustment amount</i> that the <del>data estimation entity</del> AEMO has calculated	<b>28.2 User to notify network operator</b> (d) for the <i>nomination day</i> any <i>user reconciliation adjustment amount</i> that <del>the data estimation entity</del> AEMO has calculated	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8a	<b>28.3 User to notify the <del>data estimation entity</del> AEMO of negative forecast requirement</b>	<b>28.3 User to notify <u>the data estimation entity</u> AEMO of negative forecast requirement</b>  Remove 'the' before ' <u>the data estimation entity</u> ' in all clauses.	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8c	<b>31.18 Existing user may transfer reconciliation account balance</b> The <del>registry operator</del> AEMO and <i>data estimation entity</i> AEMO must provide	<b>31.18 Existing user may transfer reconciliation account balance</b> <del>The registry operator</del> AEMO and <i>data estimation entity</i> AEMO must provide	H	AEMO agrees with the change proposed and will include them in the IIR consultation.
8a	<b>32.3</b>	<b>32.3</b> Delete 'the in 'the data estimation entity' in both subclauses.	H	AEMO agrees with the change proposed and will include them in the IIR consultation.

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50b	<p><b>6.1.4A Update Distributor Database that are not Subject to a Transfer Request</b>            Each <i>Distributor</i> must:            (a) for each <i>MIRN</i> for which the <i>failed Retailer</i> is recorded as the <i>FRO</i> and to which clause 6.1.2 does not apply, each <i>Distributor</i> must amend their database by recording the declared host Retailer as the <i>FRO</i>; and            (b) provide AEMO with a report of the details of each <i>MIRN</i> that has been updated in the database.</p>	<p><b>Suggest the following rewording:</b>  <b>6.1.4A Update Distributor Database that are not Subject to a Transfer Request</b>            Each <i>Distributor</i> must:            (a) <del>each <i>Distributor</i> must</del> amend their database by recording the declared host Retailer as the <i>FRO</i> for each <i>MIRN</i> for which the <i>failed Retailer</i> is recorded as the <i>FRO</i> and to which clause 6.1.2 does not apply; and            (b) provide AEMO with a report of the details of each <i>MIRN</i> that has been updated in the database.</p>	H	AEMO agrees with the change proposed and will include them in the IIR consultation.

Review comments submitted by: *AGL*

Date: 25<sup>th</sup> October 2013

Contact Person: *Sallie Proctor*

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	<p>General Overall Comment:</p> <p>On the basis AEMO has advised 'This is a documentation change only. There should be no system or business process implication for AEMO or Participants'</p> <p>AGL has no dissenting views, however AGL has made some commentary in relation to missed items or minor corrections to proposed changes.</p>			AEMO notes AGL's no dissenting view position on the proposed changes conditional that there should be no system or business process implication for AEMO or Participants.
1	<p>1.3 Definitions</p> <p>AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change.</p>		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business

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H = High – Critical. The issue / comments are fundamental and failure to make necessary changes has the potential to impact consensus.



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				process impact for AGL.
2	(s) plural AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change.		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
3	"monthly reconciliation account balance reduction target" has the meaning given to it in clause 31.13(1)(a).  AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change.		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
4	AEMO means Australian Energy Market Operator Limited (ACN 072 010 327)  AGL is supportive of removal of the defined term from the RMP.		L	AEMO notes AGLs support of the change.
5	contractor means a person performing any of the functions of AEMO under these Procedures from time to time. AGL is supportive of removal of this defined term from the RMP		L	AEMO notes AGLs support of the change.
6	NSW retailer of last resort  AGL is supportive of removal of this defined term from the RMP		L	AEMO notes AGLs support of the change.

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7	participant imbalance manager means AEMO. AGL agrees that the participant imbalance manager means AEMO and is supportive of the amendment.		L	AEMO notes AGLs support of the change.
8	Rules administrator means AEMO AGL agrees that the rules administrator means AEMO and is supportive of the amendment.		L	AEMO notes AGLs support of the change.
8a	data estimation entity means AEMO AGL agrees that the data estimation entity means AEMO and is supportive of the amendment		L	AEMO notes AGLs support of the change.
8b	forecasting entity means AEMO AGL agrees that the forecasting entity means AEMO and is supportive of the amendment		L	AEMO notes AGLs support of the change.
8c	registry operator means AEMO AGL agrees that the registry operator means AEMO and is supportive of the amendment		L	AEMO notes AGLs support of the change.
9	stakeholder means an interested person notified to AEMO under clause 44.  The terms of reference for the GRCF states that it provides a forum for stakeholders to raise and address issues relating to the operation or functionality of the retail market and its interactions with the respective wholesale gas markets.  AGL is concerned that by removal of the defined term from the RMP will potentially remove the ability for 'stakeholders' to attend the GRCF, changing the structure of the forum from a 'consultative forum' to a reference group or working group.	<u>stakeholder means an interested person notified to AEMO under clause 44.</u>	M	AEMO will not alter the proposed deletion as presented in the PPC on the basis that this clause 44 and the term "stakeholder" is essentially a provision that allows interested parties to register to receive notices from AEMO. There is no linkage between this stakeholder reference in the RMPs and the ToR for the GRCF.  The outworking's from the redundant provisions workshop noted that the defined term and

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				the clause was more or less redundant as all AEMO decisions and consultations are publically available.
10	transportation agreement register means the register created and maintained by the registry operator under clause 6.7. AGL is supportive of the removal of this defined term.		L	AEMO notes AGLs support of the change.
11	Note: "Written" has been deleted as Schedule 2 to the National Gas Law addresses the interpretation of different grammatical forms of this word. (note at end of definitions section could go) AGL is supportive of the removal of this Note.		L	AEMO notes AGLs support of the change.
12	30.8(5) (5) The Rules administrator must calculate the amount of divergence in cumulative imbalances under clauses 30.8(1) to 30.8(3) and the correction amounts under clause 30.8(4) using the methodology that it develops for that purpose. The Rules administrator may amend the methodology from time to time. The Rules administrator must obtain the approval of the network operator to the methodology and changes to the methodology to the extent that the methodology places obligations on the network operator.  AGL is supportive of this amendment.		L	AEMO notes AGLs support of the change.

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13	<p>42.2 AEMO to provide monthly report. The basis of PPC IN004/13 'Redundant Provisions' was to review and amend on the basis that there will be no impact on the system or business process as a result of this change. AGL is concerned that the removal of this monthly report may impact systems and/or business process. On this basis AGL does not support the removal of clause 42.2.</p>	<p><u>42.2Reporting</u> <u>The data estimation entity must provide to each user a report each month containing the following information relating to that user, for each network section and for each nomination day in the previous month:</u> <u>(1) total estimated withdrawals;</u> <u>(2) apportionment factor;</u> <u>(3) corrected reconciliation adjustment amount;</u> <u>(4) reconciliation account balance; and</u> <u>(5) total daily withdrawals.</u></p>	M	<p>In a recent AEMO market audit, it was identified that the monthly report as noted in RMP clause 42.2 wasn't being generated by the GRMBS but being generated and sent to participants on a daily basis. At the June GRCF-N/A it was agreed that given the report wasn't being generated as a monthly report RMP clause 42.2 is no longer required and therefore can be included in the consultation for the removal of redundant provisions.</p> <p>AEMO will therefore not alter the proposed deletion as presented in the PPC.</p>
The 14	<p>43.4 AEMO to notify market participant and Rules administrator of its decision  AGL is supportive of this amendment.</p>		L	AEMO notes AGLs support of the change.
15	<p>44. STAKEHOLDERS  As stated in #9.  The terms of reference for the GRCF states that it provides a forum for stakeholders to raise and address issues relating to the operation or functionality of the retail market and its interactions</p>	<p><u>STAKEHOLDERS</u> <u>Requests to become a stakeholder of AEMO</u> <u>(1) Any group or person may by notice to AEMO request to become a stakeholder.</u> <u>(2) A notice referred to in clause 44.1(1) must include:</u> <u>(a) the name of the proposed stakeholder; and</u> <u>(b) the address, telephone number, facsimile</u></p>	M	See AEMO response in item # 9 within AGLs feedback.

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	<p>with the respective wholesale gas markets.</p> <p>AGL is concerned that by removal of the defined term from the RMP will potentially remove the ability for 'stakeholders' to attend the GRCF, changing the structure of the forum from a 'consultative forum' to a reference group or working group.</p> <p>Whilst this does not introduce system changes, this changes the terms of reference of existing gas forums. On this basis AGL does not support the removal fo this section.</p>	<p><u>number and email address of the contact person for the stakeholder.</u></p> <p><u>(3) AEMO must accept a request made under clause 44.1(1) as soon as practicable after receipt of such a request and establish and maintain a register of stakeholders.</u></p>		
16	<p>PART J – NSW RETAILER OF LAST RESORT PROVISIONS</p> <p>AGL agrees that this is no longer required since introduction of NECF in NSW and is supportive of the removal of this section.</p>		L	AEMO notes AGLs support of the change.
16a	<p>38.1 AEMO may appoint impendent auditor</p> <p>AGL notes that inserted audit provisions are very similar to the provisions of Part 19 and Part 20 of the NGR. We consider componenets of Part 20 of the NGR should also be incorporated for completeness.</p> <p>We agree with the new definition, however request the insertion of the additional clause for retention of information.</p>	<p><u>Retention of information</u></p> <p><u>AEMO must retain all information provided for at least 7 years in a form which the information is reasonably accessible.</u></p>	M	<p>AEMO notes AGL agreement for the insert of the market audit provision.</p> <p>AEMO also notes AGL request to consider the inclusion a clause for retention of AEMO information similar to those referred to in part 19 and 20 of the NGR.</p> <p>See also AEMO feedback on market audit changes on page 33.</p>

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16b	1.5 Confidential Information AGL supports the inclusion of the Note		L	AEMO notes AGLs support of the change.
17	Definitions			
18	Access arrangement means an access arrangement made by: (a) ESCOSA under the old access law and Gas Code; or (b) by the AER under the National Gas Law and the Rules  AGL acknowledges that this a term defined in the NGR and is supportive of the removal of this defined term.		L	AEMO notes AGLs support of the change.
19	"active in the market" has the meaning given to it under clause 377B(1).  AGL is supportive of the amendment only on the basis that there will be no impact on the system or business process as a result of this change.		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
20	"appointor" has the meaning given to it under clause 228(2).  AGL is supportive of the amendment only on the basis that there will be no impact on the system or business process as a result of this change.		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.

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21	<p>auditor" means an auditor appointed under Part 7.2.</p> <p>AGL is supportive of the amendment only on the basis that there will be no impact on the system or business process as a result of this change. We note that there are Market Audit and Monitoring provisions in the NRG and request consistency.</p>		L	<p>AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.</p> <p>See also AEMO feedback on market audit changes on page 33.</p>
22	<p>"automated response message" means an email ("reply email") sent automatically, subject to clause 12A(4), upon receipt of an email ("original email"), where the reply email is sent from an addressee's information system to the sender of the original email, acknowledging that the original email has been received by the addressee's information system and containing:</p> <p>(a) the name of the originator of the original email;</p> <p>(b) at least the time, date and subject title of the original email;</p> <p>{Note: The easiest means to record this information may be to include the whole of the original email, preferably excluding attachments, within the reply email.}</p> <p>€ the name of the addressee of the original email;</p> <p>and</p> <p>(d) the date and time the original email was received by the addressee's information system (which in the absence of evidence to the contrary is taken to be the creation date of the reply email).</p> <p>AGL is supportive of the amendment to the</p>		L	<p>AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.</p>

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	definition and the subsequent amendment to clause 12A. Notices by email on the basis that there will be no impact on the system or business process as a result of this change.			
23	<p>"business hours" means the period between start of business and close of business.</p> <p>"start of business" means 0800 hours in South Australia.</p> <p>"close of business" means 1700 hours in South Australia.</p> <p>AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change.</p>		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
24	<p>"claim" includes any claim, legal action or demand.</p> <p>AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change.</p>		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
25	<p>"clause 192(2) notice" has the meaning given to it in clause 192(2).</p> <p>AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change.</p>		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business



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				process impact for AGL.
26	<p>"confidential information" means confidential and proprietary information of a participant, pipeline operator or prescribed person, that:</p> <p>(a) is or might reasonably be expected to be confidential in nature or to be special, unique, proprietary or to give the person a competitive advantage; or</p> <p>(b) is disclosed in circumstances of confidentiality.</p> <p>AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change.</p> <p>We note there is still one italicised 'confidential information' in the document</p>	Remove italicised 'confidential information' in 330 (3)	L	<p>AEMO notes AGL support of the change and the correction to remove the italicised 'confidential information.'</p> <p>AEMO agrees with the proposed change and will include them in the IIR consultation.</p>
27	<p>"dispute" includes any difference, dispute, matter, question, controversy, claim or legal action in connection with or arising out of these Procedures</p> <p>AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change.</p>		L	<p>AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.</p>
28	<p>ESCOSA" has the same meaning as —Commission   has under the Gas Act 1997 (SA). {Note: At the time these Procedures commenced, —Commission means —the Essential Services Commission established under the Essential Services Commission Act 2002.}</p> <p>AGL is supportive of this amendment and the</p>		L	<p>AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.</p>

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	insertion of 'jurisdictional regulator for South Australia' in place of ESCOSA			
29	"exit the market" has the meaning given to it under clause 377B(1). AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change.		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
30	indemnifier" has the meaning given to it in clause 366. AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
31	"indemnifying party" has the meaning given to it under clause 377A(1). AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change.		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
32	"negative assurance audit" means a review with the objective of enabling the auditor to state whether, on the basis of review procedures that do not provide all the evidence that would be required in a standard audit, anything has come to the auditor's attention that indicates (as applicable): (a) AEMO's non-compliance with the clauses set out		L	AEMO notes AGL comment not support the removal of this definition as the revised Market Audit section seems to lessen the audit requirements within the existing procedures.

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	<p>under clause 228(1); or (b) a network operator's non-compliance with the clauses set out under clause 228(1).</p> <p>A negative assurance audit was to cover the following sections of the procedures <b>at least once every 3 years</b> Part 2.1, Part 2.2, Part 2.3, Part 3.1, Part 3.3, Part 3.5, Part 3.6, Part 5.5, Part 5.6, Part 5.7, Part 5.8, Part 5.10, Part 5.11, Part 5.12 in accordance with clause 351(1A) to (3). AGL does not support the removal of this definition as the revised Market Audit section seems to lessen the audit requirements within the existing procedures.</p>			<p>The outworking's from the redundant provisions workshop noted agreement to delete definition, although audit arrangements will be maintained under the framework suggested in item #43 for SA (see also #16a(NSW/ACT), and #50a (VIC)).</p> <p>AEMO can confirm that AEMO will be maintaining the existing market audit arrangements that are operative today. These arrangements cover the parts that AGL has mentioned in their comments therefore AEMO is of the view that the removal of this definition will not alter or lessen the audit requirements at exist today.</p> <p>See also AEMO feedback on market audit changes on page 33.</p>
33	<p>network" means a distribution pipeline within the meaning of the National Gas Law. AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change.</p>		L	<p>AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.</p>

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34	<p>"pipeline" means a pipeline for the transmission of gas to a network. AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change.</p>		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
35	<p>6B. Distribution tariff codes A network operator must publish, including any amendments, and provide on request, the distribution tariff codes applying in each of the network operator's sub-networks.</p>		L	
36	<p>20. AEMO standing data.. (1) € the <i>GBO Identification of the RoLR</i>; and Source column – AEMO (<i>drawing the information from the ROLR scheme</i>) Noting that AEMO review of Procedures after the workshop, AGL is only supportive of this amendment on the basis that there will be no impact on the system or business process as a result of this change.</p>		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
37	<p>20 AEMO standing data. (1) In clause 20(1), "source" means the person responsible for providing the information to AEMO, not necessarily the person who is the originating source of the information.  {Note: If there is no ROLR scheme, then the item of</p>		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.

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	<p>AEMO standing data in clause 20(1)€ will be a dummy GBO identification.}</p> <p>Noting that AEMO review of Procedures after the workshop, AGL is only supportive of this amendment on the basis that there will be no impact on the system or business process as a result of this change.</p>			
38	<p>22. GBO identification</p> <p>AGL is supportive of the removal of the notation under clause reference (b) on the basis that there will be no impact on the system or business process as a result of this change.</p>		L	<p>AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.</p>
39	<p>22. GBO identification</p> <p>The amendment is to remove clause 22(3)(a). This will then leave 22(3)(b) and 22(3)(c). Should these 2 remaining clauses be renumbered?</p>			<p>The existing practice is to not to renumber clauses because this can become problematic if the clause reference that isn't being deleted is reference elsewhere in the RMP. The deleted clause numbering remains but will contain the text "There is no clause 22(3)(a)".</p> <p>AEMO will not alter the numbering as presented in the PPC.</p>
39A	<p>Part 3.2 MIRN DISCOVERY</p> <p>Agree to amendment as correction of a typo.</p>		L	<p>AEMO notes AGL support of the change.</p>

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40	83 Requirements for valid transfer request AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
41	192. If allocation instruction is invalid (3) If AEMO has been required to allocate a <i>user's gas injections</i> for a <i>gas day</i> for a <i>sub-network</i> using the method set out in clause 192(2)(d), then AEMO must <i>immediately notify</i> the <i>network operator</i> and the <b>ROLR administrator</b> that AEMO was required under clause 192(2)(d) to allocate the <i>user's gas injections</i> for the <i>sub-network</i> to <i>shippers</i> which are not listed in the <i>shipper register</i> for the <i>user</i> for the <i>sub-network</i> .		L	
42	248. Calculate user's deemed withdrawals for a pipeline AGL is supportive of the amendment to the definition on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
43	Chapter 7 – Audit AGL notes that inserted audit provisions are very similar to the provisions of Part 19 and Part 20 of the NGR. We consider componenets of Part 20 of the NGR should also be incorporated for completeness.		L	See AEMO response in item # 16a within AGLs feedback  See also AEMO feedback on market audit changes on page 33.

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45	8.2 – confidentiality AGL is supportive of the amendment to this section on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
46	Part 8.6 – Exiting the Market AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
47	Chapter 10 AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
48	Appendix 4 – Auditor’s deed of undertaking AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.  See also AEMO feedback on market audit changes on page 33.

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49	Appendix 9 – Fallback user-shipper agreement AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
50	5.1.1(d) (d) If after five business days AEMO has not received a validated complete customer listing in accordance with clause 5.1.1(b), AEMO may notify the jurisdictional regulator for Victoria of the failure. AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
50a	New Market Audit clause AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change, noting the feedback providing for SA and NSW/ACT is applicable.		L	See AEMO response in item # 16a within AGLs feedback  See also AEMO feedback on market audit changes on page 33.
50b	6.1.3 Update Metering register that are not Subject to a Transfer Request Before the RoLR gas day, for each MIRN for which the failed Retailer is recorded as the FRO and to which clause 6.1.2 does not apply, AEMO must amend the metering register by recording the declared host Retailer for the relevant distribution area as the FRO. Note: By virtue of a licence condition included pursuant to section 51D of the Gas Industry Act 2001 (Vic), declared host Retailers are Retailers of Last Resort in the case of the failure of another		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.



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	Retailer. AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change			
51	Definition of an auditor is redundant AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change		L	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.  See also AEMO feedback on market audit changes on page 33.
52	This is meant to be blank. AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change		L	
	NMISTANDINGDATARESPONSE Data Element = CustomerThersholdCode Usage = Not required where CustomerClassificatioCode is "RES"	Not required where CustomerClassification <u>n</u> Code is "RES"	L	AEMO agrees with the proposed change and will include in the IIR consultation.
A1. aseXML Data Elements	ConsumptionThresholdCode  AGL is of the view that this should have been amended to CustomerThresholdCode	<del>Remove ConsumptionThresholdCode</del> <u>Insert CustomerThresholdCode</u>	L	AEMO used an older version of PBP3 System Interface Definitions document to shows the which had Consumption Threshold

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				incorrectly labeled in the example. The current version of the System Interface Definitions and section A.1 aseXML Data Elements shows the element name as "CustomerThreshold. No further change to the documentation is required but to avoid confusion AEMO will provide an better example in the IIR.
<b>GTPWG ELEMENT NAME</b>	Consumption Threshold Code  AGL is of the view that this should have been amended to CustomerThresholdCode	<del>Remove-ConsumptionThresholdCode</del> <u>Insert CustomerThresholdCode</u>	L	See above response.
ServiceOrderRequest	Required in SA for Service Connection Request <u>and Meter Fix Connections</u> (Job Enquiry Codes = "SCR") or "MFX". Not Required in WA  As advised by AEMO, this is being amended to reflect current business practice. AGL is supportive of the amendment on the basis that there will be no impact on the system or business process as a result of this change		M	AEMO notes AGL support of the change. AEMO is of the opinion these changes are documentation only and they should therefore not result in a system of business process impact for AGL.
<b>27.3</b>	Clause 27.3 User to notify the AEMO of negative forecast requirement	Clause 27.3 User to notify <del>the</del> AEMO of negative forecast requirement	L	AEMO agrees with the proposed change and will include in the IIR consultation.

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

Ref # in Attachment "A" of PPC.	Clause / Issue / Comment	Proposed revised RMP text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	Rating <sup>2</sup> (H/M/L)	AEMO Response
28.7	28.3 User to notify the AEMO of negative forecast requirement	28.3 User to notify <del>the</del> AEMO of negative forecast requirement	L	AEMO agrees with the proposed change and will include in the IIR consultation.
2.3	The AEMO must ensure that <i>delivery point information</i> for each <i>delivery point</i> included in the <i>delivery point registry</i> is maintained in an immediately accessible format for at least seven years.	<del>The</del> AEMO must ensure that <i>delivery point information</i> for each <i>delivery point</i> included in the <i>delivery point registry</i> is maintained in an immediately accessible format for at least seven years.	L	AEMO agrees with the proposed change and will include in the IIR consultation.
2.4	<b>2.4 AEMO to maintain delivery point information greater than 7 years old</b> The AEMO must ensure that <i>delivery point information</i> for each <i>delivery point</i> included in the <i>delivery point registry</i> greater than 7 years old is maintained or archived in a format accessible within a reasonable period of time.	<del>The</del> AEMO must ensure that <i>delivery point information</i> for each <i>delivery point</i> included in the <i>delivery point registry</i> greater than 7 years old is maintained or archived in a format accessible within a reasonable period of time.	L	AEMO agrees with the proposed change and will include n the IIR consultation.

Review comments submitted by: *Lumo Energy*

Date: 24 Oct 2013

Contact Person: *Mark Riley*

<b>***Participants are to complete the relevant columns below in order to record their response.***</b>				
<b>Ref # in Attachment "A" of PPC.</b>	<b>Clause / Issue / Comment</b>	<b>Proposed revised RMP text</b> <del>Red-strikeout</del> means delete and <u>blue underline</u> means insert	<b>Rating<sup>3</sup> (H/M/L)</b>	<b>AEMO Response</b>
	General Overall Comment Lumo has reviewed the PPC for IN004/13 and has no objections to the proposals.			AEMO noted notes Lumo no objection to the proposal

<sup>3</sup> L = Low: - Not critical. Issues / Comments are minor. They add clarity to the document. No major concern if not included in any further revisions  
M = Medium: - Important. Strong case that issue / comments should be consider and an update to the document is desirable, but not critical.  
H = High – Critical. The issue / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

Review comments submitted by: *Energy Australia*

Date: 25 Oct 2013

Contact Person: *Hillary Nguyen*

<b>***Participants are to complete the relevant columns below in order to record their response.***</b>				
<b>Ref # in Attachment "A" of PPC.</b>	<b>Clause / Issue / Comment</b>	<b>Proposed revised RMP text</b> <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	<b>Rating<sup>4</sup> (H/M/L)</b>	<b>AEMO Response</b>
	General Overall Comment Energy Australia have reviewed the changes made as part of IN004/13 and can confirm that we have no system impacts as a result of the changes and therefore support the changes that have been put forward.			AEMO noted notes EAs support for the proposal

<sup>4</sup> L = Low: - Not critical. Issues / Comments are minor. They add clarity to the document. No major concern if not included in any further revisions  
M = Medium: - Important. Strong case that issue / comments should be consider and an update to the document is desirable, but not critical.  
H = High – Critical. The issue / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

Review comments submitted by: *Jemena*

Date: 6 Nov 2013

Contact Person: *Mesh Weerackoon*

***Participants are to complete the relevant columns below in order to record their response.***				
Ref # in Attachment "A" of PPC.	Clause / Issue / Comment	Proposed revised RMP text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	Rating (H/M/L)	AEMO Response
12	<p>Jemena would like to retain clause 30.8(5) wording rather than delete the wording as currently proposed on the basis that the cumulative imbalance methodology has system security implications and as such Jemena must be asked to approve the methodology even if a change is agreed with the market.</p> <p>The RMP is drafted as follows:                      (5) The Rules administrator AEMO must calculate the amount of divergence in cumulative imbalances under clauses 30.8(1) to 30.8(3) and the correction amounts under clause 30.8(4) using the methodology that it develops for that purpose. The Rules administrator AEMO may amend the methodology from time to time after consultation with market participants. The Rules administrator must obtain the approval of the network operator to the methodology and changes to the methodology to the extent that the methodology places obligations on the network operator.</p> <p>Jemena contended that cumulative imbalance methodology has system security implications and as such Jemena must be asked to approve the methodology even if a change is agreed with the</p>	<p>Jemena proposes that the change to the RMP be drafted as follows:</p> <p>(5) <del>The Rules administrator</del> <u>AEMO</u> must calculate the amount of divergence in <i>cumulative imbalances</i> under clauses <b>30.8(1) to 30.8(3)</b> and the correction amounts under <b>clause 30.8(4)</b> using the methodology that it develops for that purpose. <del>The Rules administrator</del> <u>AEMO</u> may amend the methodology from time to time <u>after consultation with market participants</u>. <del>The Rules administration</del> <u>AEMO</u> must obtain the approval of the <i>network operator</i> to the methodology and changes to the methodology to the extent that the methodology places obligations on the <i>network operator</i>.</p>		<p>AEMO has considered Jemena's point regarding system security implications and AEMO has agreed not to delete the last sentence. The IIR will include the proposed revised RMP text.</p>

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	market. AEMO advised that Jemena is welcome to include this feedback during the PPC.			

Review comments submitted by: *AEMO and GRCF*

Date: *25 Oct 2013 and 6 Nov 2013*

Contact Person: *Danny McGowan*

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Participant Build Pack 4: Queensland Specific Build Pack  4.1 Meter Fix Request (Ref No. 87) page 49-52	Discussion between Envestra and AEMO identified that the marked up changes in the PPC incorrectly represented the proposed changes for the fields LoadDetails/PerHour and the LoadDetails/PerAnum. Essentially QLD and VIC need to be the same.			AEMO to rectify the anomaly in the PPC and include the correct QLD markups to reflect that the LoadDetails/PerHour and the LoadDetails/PerAnum are the same as VIC. The IIR will be updated accordingly.

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

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(New) VIC RMPs	<p>AEMO and Origin identified that the definition for "declared host retailer" was removed from the NGR. The definition was <i>"in respect of a declared distribution system, the declared host retailer designated under legislation of the adoptive jurisdiction"</i>.</p> <p>This is an issue that was recently added to the issues/change register (IN023/13)</p> <p>At the GRCF meeting on the 6 Nov, it was agreed that the definition as prescribed in the NGR needs to be included in the RMP-V as part of work package #2 program of work.</p>	<p><u>declared host Retailer means in respect of a declared distribution system, the declared host Retailer designated under the legislation.</u></p>		<p>AEMO will include the proposed changes that were agreed by the GRCF in the IIR.</p>
# 37	<p>The replacement to the RoRL Scheme with RoLR event in the note reference for clause 20 (2) was discussed at the Nov GRCF meeting. The GRCF agreed that the note didn't add any value and therefore should be deleted from the RMP altogether.</p>	<p>Clause 20 (2)</p> <p>In clause 20 (1), "source" means the person responsible for providing the information to AEMO, not necessarily the person who is the originating source of the information.</p> <p><del>{Note: If there is no ROLR scheme, then the item of AEMO standing data in clause 20(1) (e) will be a dummy GBO identification.}</del></p>		<p>AEMO will include the proposed changes that were agreed by the GRCF in the IIR.</p>



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

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16A, 32, 43, 50A and 51	AEMO has further reviewed the proposed market audit changes internally and therefore decided to hold off progressing these market audit changes until this review is complete. AEMO will include market audit RMP changes as a new item on the issues/change register.	Revert all proposed market audit provision RMP changes back to their existing state.		AEMO will not be included the market audit changes in the IIR.  AEMO will also add an item to the issues / change register.