

May 2022 Readiness Working Group / 2022 Implementation Forum

Friday, 13 May 2022

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AEMO Competition Law Meeting Protocol

AEMO is committed to complying with all applicable laws, including the Competition and Consumer Act 2010 (CCA). In any dealings with AEMO regarding proposed reforms or other initiatives, all participants agree to adhere to the CCA at all times and to comply with this Protocol. Participants must arrange for their representatives to be briefed on competition law risks and obligations.

Participants in AEMO discussions **must**:

1. Ensure that discussions are limited to the matters contemplated by the agenda for the discussion
2. Make independent and unilateral decisions about their commercial positions and approach in relation to the matters under discussion with AEMO
3. Immediately and clearly raise an objection with AEMO or the Chair of the meeting if a matter is discussed that the participant is concerned may give rise to competition law risks or a breach of this Protocol

Participants in AEMO meetings **must not** discuss or agree on the following topics:

1. Which customers they will supply or market to
2. The price or other terms at which Participants will supply
3. Bids or tenders, including the nature of a bid that a Participant intends to make or whether the Participant will participate in the bid
4. Which suppliers Participants will acquire from (or the price or other terms on which they acquire goods or services)
5. Refusing to supply a person or company access to any products, services or inputs they require

Under no circumstances must Participants share Competitively Sensitive Information. Competitively Sensitive Information means confidential information relating to a Participant which if disclosed to a competitor could affect its current or future commercial strategies, such as pricing information, customer terms and conditions, supply terms and conditions, sales, marketing or procurement strategies, product development, margins, costs, capacity or production planning.

Agenda

Greg Minney



Agenda

#	Time	Topic	Presenter
1	10:00 – 10:05	Welcome and Agenda	Greg Minney
2	10:05 – 10:10	Actions	Greg Minney
3	10:10 - 10:15	GS MCPI Go Live Summary	Greg Minney
4	10:15 – 10:25	November 22 scope and Milestones	Greg Minney / Meghan Bibby
5	10:25 – 10:40	Implementation Forum – TOR and Membership	Meghan Bibby
7	11:10 – 11:25	MSDR Focus Group	Blaine Miner
8	11:25 – 11:30	UFE Focus Group #7 - Update	Greg Minney
9	11:30 – 11:40	Implementation Forum Membership	
10	11:40 – 11:50	Industry Risk and Issues - Industry Risks for 2022 Implementation Forum	Greg Minney
11	11:50 – 11:55	Forward Plan and Other Business Tranche 2 Meters rollout	Greg Minney
12	11:55 – 12:50	Questions	Greg Minney
13	12:00	Meeting Close	Greg Minney

Actions

Greg Minney



Actions

ID	Status	Action	Comment
4.9.2	Open	Tranche 2 metering rollout plans	A consolidated version has been sent out. If a new plan was not received the last available plan was included. Request April rollout update distributed
5.6.1	Closed	Feedback on the NMI submissions	Feedback has been circulated and is also added in the RWG pack.
5.8.1	Closed	Industry Risks and Issues	BUT tool scope delivery has been added to the register, with a new post-May register to be created.
6.8.1	Closed	Cross Boundaries update	PL to provide an update regarding cross boundaries during the week of 25 th April, Further Status Updates will be provided

GS/ MCPI Go-live Summary

Greg Minney



GS/MCPI Go-Live – Deployment Summary

MSATS 47.1, r42 aseXML Schema Software

- Deployed on schedule 27/4
- No exceptions encountered

MCPI / GS procedures effective

- Effective Date of CR procedures 1/5
- Participant management of NMI Create , NMI update during transition period
- Monitoring of NMI creation for date effective prior 1/5 in place

GS “GLOPOOL” Update

- Bulk changes processed 2/5
- 10.8M NMIs updated for with LR = “GLOPOOL” to activate GS processing
- All changes effective as at 1/5

eMDM update completed

- Standing Data updated 3/5
- Metering Data Backlog processed, returned to normal operation 2.00pm

Production and Distribution of “GLOPOOL” Reconciliation reports

- Distribution to registered participants 4th May

First GS settlement invoice

- Week 19 Preliminary due 13th May

GS Go-live Support

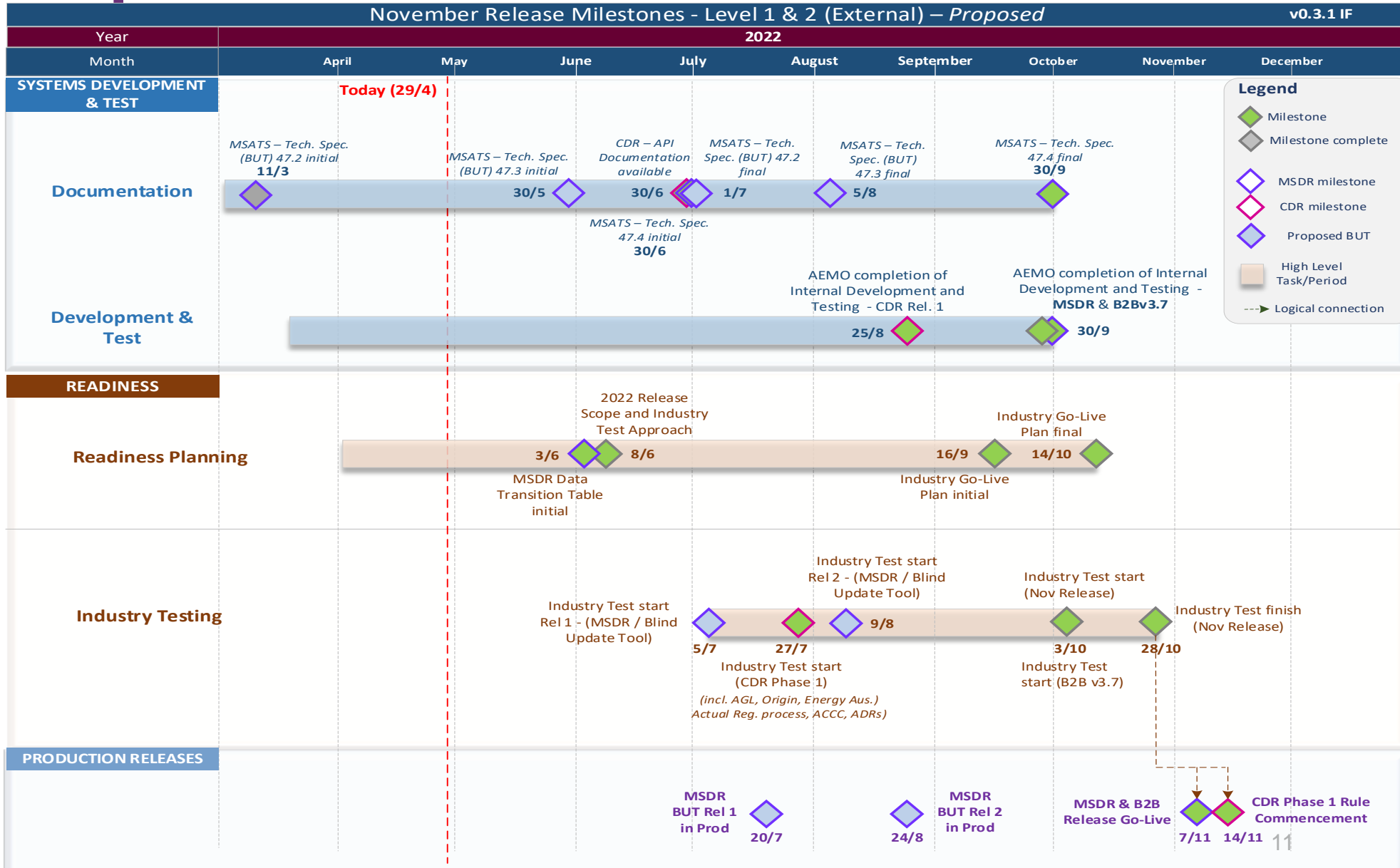
- Successful Execution of Market Trial
 - No Major Defects encountered
 - CR Issues/defects raised during Market Trial were fixed prior to Go-live
 - Settlements issues raised typically related to a lack of understanding of Global Settlement processing and test data alignment
 - Outstanding Defect:
 - Calculation of UFEF in RM43/46 reports has a business workaround, fix to be released to Production ASAP
- Settlements Issues identified post go-live to be addressed via settlement revision process
 - Changes applied, where possible, to be incorporated into subsequent settlement revisions for trading weeks in question
- Industry Engagement re UFE management will continue via the UFE Focus group
 - 18 May session scheduled for Q&A on preliminary invoice
- Production system issues are to be logged through the AEMO service desk using BAU processes
 - Project team is in place to support BAU operations
 - Priority defects will be incorporated into Production releases progressively (e.g., RM43/46)

November 22 Scope and Milestones

Greg Minney / Meghan Bibby



Proposed milestones – Nov 22 release



Nov 2022 release - Approach

- Milestones and staged delivery approaches:
 - To be reviewed and agreed with Implementation Forum, MSDR Focus Group
 - Reflects Immediate roadmap scope
 - Milestones and scope of Implementation Forum to reflect Regulatory Roadmap releases
 - Progressive incorporation into forum scope
- Progressive Deployment for Industry implementation and Testing:
 - BUT Capability
 - CDR Phase 1 APIs
- Data Transition approach to agree migration / update timeframes within compliance windows
- Capability for Nov 7 Release:
 - BUT for Changed Fields
 - BUT for New Fields
 - Blind update Scripts
 - B2B v 3.7 (Browser, EVM)
 - MSDR CR, Browser changes
 - CDR Phase 1
 - Meter Exemptions to be delivered post Nov 7, release date TBD
- Industry Testing (non-Market Trial) currently proposed for all releases (interim and final)
 - ITWG support and timing of industry engagement to be established
 - No Pre-prod refresh prior to Go-Live currently proposed, some releases (e.g. CDR) may require metering data to be set up to support Participant Tests
 - Timing of updates (e.g. Blind Update Scripts) during industry trial periods to reflect planned go-live approaches
- Consolidated Industry GO-Live plan for all initiatives for Nov 7 deployment

Delivery Approach – BUT Deployment – Capability and timing

- BUT Transactions consist of:
 - **BUT CSV Submission (Participant initiated):** Contains a list of NMIs and the value to be blind updated
 - **BUT CSV Response (AEMO initiated):** Contains the same data as the BUT CSV Submission as well as the resulting Response Code and Description to indicate:
 - The submission record has been successfully applied to the CATS Standing data field
- **OR**
- The submission record was rejected due to a validation error, e.g. “This value has illegal characters.”
- To provide value to Participants as soon as possible, AEMO is considering a Minimal Viable Product (MVP) option.
- BUT MVP option:
 - For the population of SharedIsolationPointFlag (SIPF), only
 - **BUT CSV Submission:**
 - Self-service via MSATS Browser (or) API.
 - Where message validations pass:
 - SIPF NMI Standing Data value shall be updated
 - Updated value shall be provided in the CATS C1 report response to Industry
 - **BUT CSV Response:**
 - BUT CSV Response provided to initiating party via a **manual** workaround
 - AEMO to provide BUT CSV Responses as a password-protected ZIP file via AEMO’s SharePoint Participant folders (<https://aemocloud.sharepoint.com>)
 - SLA of 5 business days for the provision of response
 - Industry notified via email when responses are available for download

Delivery Approach – BUT Deployment – Capability and timing

Option	Releases	Supported Self Service Functions	Indicative Timeframes	Pros	Cons
Option 1: For SIPF Transition two stage release of BUT functionality	Release 1: MVP BUT	<ul style="list-style-type: none"> BUT Submission 	<ul style="list-style-type: none"> PRE-PROD 05-JUL-22 PROD 20-JUL-22 	<ul style="list-style-type: none"> 1mth earlier access to BUT submission functionality for MCPI/SIPF 	<ul style="list-style-type: none"> 2 step BUT implementation for AEMO and Participants, including technical specifications, release mgt, testing, etc. Operational overhead to maintain a temporary manual process for BUT Responses
	Release 2: Full BUT	<ul style="list-style-type: none"> BUT Submission BUT Response 	<ul style="list-style-type: none"> PRE-PROD 09-AUG-22 PROD 24-AUG-22 		
Option 2: For SIPF Transition one consolidated release of BUT functionality	Release 1: Full BUT	<ul style="list-style-type: none"> BUT Submission BUT Response 	<ul style="list-style-type: none"> PRE-PROD 09-AUG-22 PROD 24-AUG-22 	<ul style="list-style-type: none"> 1 step BUT implementation for AEMO and Participants, including: technical specifications, release mgt, testing, etc. Full control of submission and response processing 	<ul style="list-style-type: none"> 1mth delay in being able to access BUT functionality for MCPI/SIPF

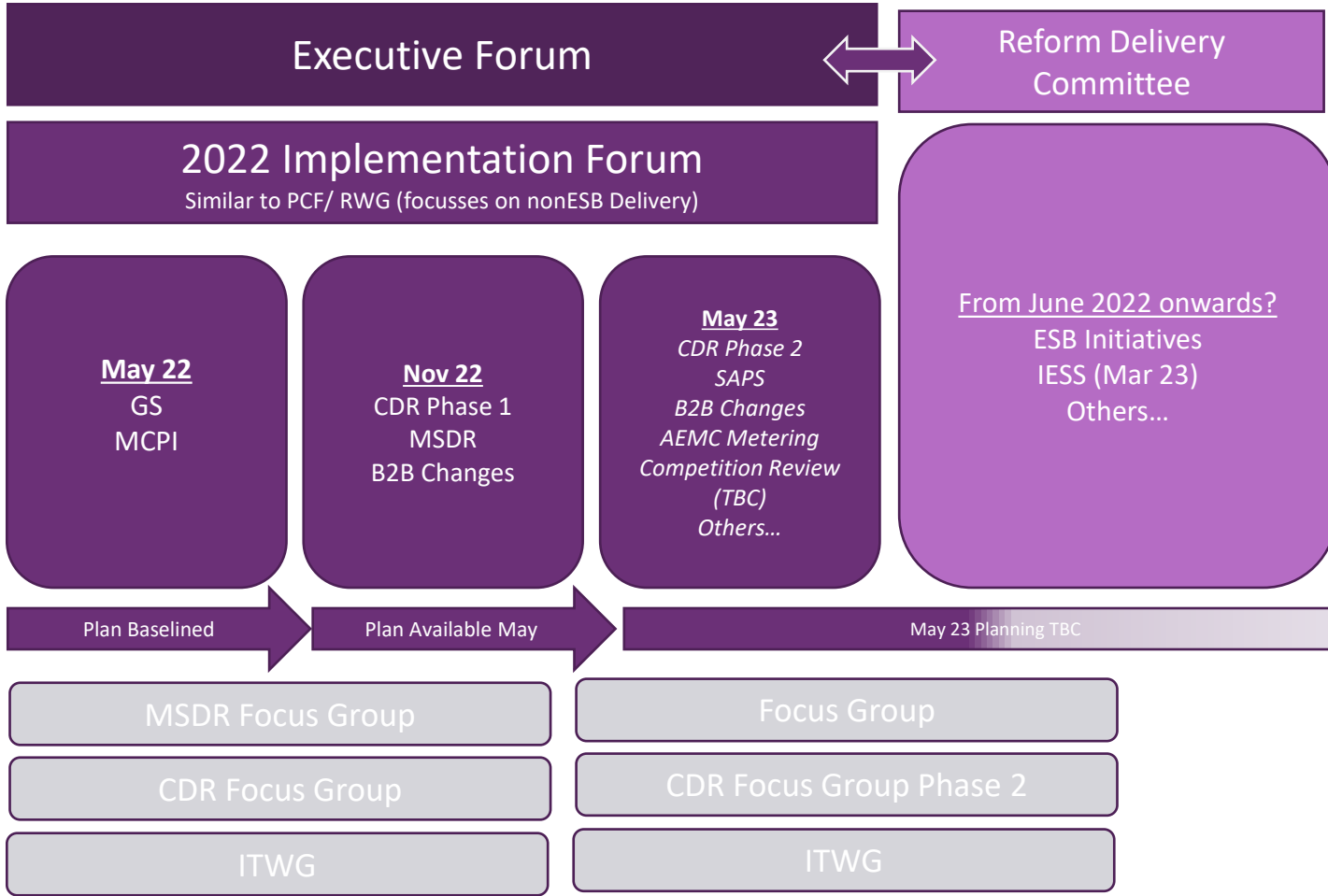
- Would Industry prefer to invest in a 2 step BUT release?
- Initial feedback due to GSMSDR@aemo.com.au **by next Friday 20 May**, for consideration by the MS DR FG on Monday 23 May

Implementation Forum – TOR and Direction

Tui Grant



Engagement Approach 2022



Executive Forum:

Meets as required, senior stakeholder engagement
Purpose: 2022 AEMO Regulatory Implementation

2022 Implementation Forum

Meet Monthly, Initiative Implementation Focus
Purpose:
 Program oversight and co-ordination of all 2022 implementation programs

- Implementation, transition milestones and progress management
- Impact management for changed milestones
- Release Focus with Participant program alignment
- Industry Issue and risk management

Focus Groups:

Meet as Required
Purpose:

- Detail development on specific subject areas e.g., MS DR Data Transition, Industry testing approach

Implementation Forum – Scope and approach

Objective:

- Program oversight of the Business and System implementation of regulatory roadmap and NEM2025 initiatives
- Alignment to Participant implementation alongside AEMO system and process changes
- Initial scope – November 2022 initiatives
 - Expanded to May 23 initiatives as commitment established
- Participant representation
 - Forum to take program level view within Implementation forum
 - Suggested Representation Project Management, Business Sponsor, Implementation Lead
 - Participants to confirm nominations based on upcoming initiatives
- Focus Groups:
 - Specific topic group e.g. MS DR, ITWG
 - Will continue with role expanded as scope of program increases
 - Short term focus groups (e.g. Industry Go-Live Planning) will also be utilised to leverage limited participant technical and business resources

MSDR Focus Group

Blaine Miner



MSDR Focus Group Update

- The MSDR Focus Group is currently finalising the ‘MSDR Data Transition Table’
- The MSDR Data Transition Table contains details associated to the applicable New and Amended MSDR fields effective from 7 Nov 2022, details include:
 - Procedural requirements i.e., Mandatory or Required
 - Compliance Holiday details, if applicable
 - Agreed standing data update mechanisms e.g., CRs, AEMO blind script updates, Blind Update Tool (BUT)
 - BUT configuration, if applicable
 - Industry priority ratings
 - Responsible Party
 - Data Transition End Date
 - Commentary
- A subgroup of the MSDR FG was created last month to support the initial population of the table, for broader FG consideration this month
- Currently targeting 3 June 2022 for the completion of the table
- Next steps:
 - Once the table has been agreed, associated scheduling, coordination and tracking considerations will commence

UFE Focus Group Update

Greg Minney



UFE Focus Group Update

- 7th UFE Focus Group to held 18 May
- Agenda
 - First Preliminary GS Invoice – Q&A
 - Approach to Initial UFE trends report
 - Approach to Ongoing engagement

Industry Risks and Issues Review – November 2022

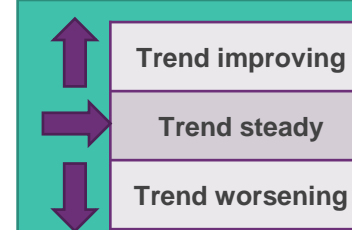
Greg Minney



Approach to the risk review

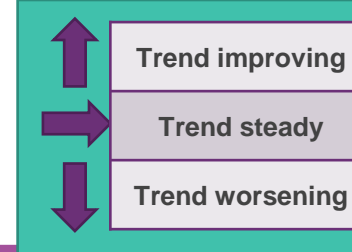
- Review of trends and Risk ratings against key Industry risk and verification of mitigation strategies
- New industry risks noted from previous review
- Initial view of Risk to be considered for November 2022

May 22 Readiness Risks



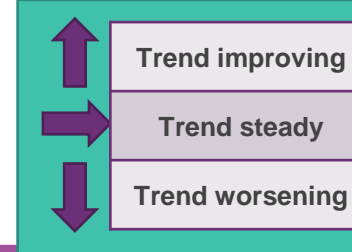
ID	Description	Inherent Rating	Controls/Comments	Residual Rating	Proposed Trend
R1	<p>Small participant readiness Small participants are not adequately engaged due to resource limitations, resulting in small participants not having the ability or the information to execute their programs</p>	<p>Likelihood: Possible Consequence: Minor Rating: Medium</p>	<ul style="list-style-type: none"> AEMO completed a number of rounds of small participant mailouts Relevant FRMPs will have started to see UFE as a line item on their bill and should be aware of the changes Rule commencement does not require a critical mass of participant readiness (No Change) 	<p>Likelihood: Unlikely Consequence: Minor Rating: Low</p>	
R2	<p>Resources Constraints over summer period There is a risk that there will be resource constraints over the summer period, particularly given the impact of covid and the intensity of 5MS, Customer Switching & WDR commencements. This could impact participant delivery plans for 1 May 2022</p>	<p>Likelihood: Possible Consequence: Moderate Rating: Significant</p>	<ul style="list-style-type: none"> Participants to manage their resource schedule and implementation plans Industry Test and Market Trials have been scheduled after the summer period where aligned resource delivery is required Scope of MSDR delivery removed from May release Risk Closed 	<p>Likelihood: Unlikely Consequence: Moderate Rating: Medium</p>	
R3	<p>The AEMO business and operations are not ready for GS and MCPI on 1 May 22 The AEMO business may not be ready to deliver the full extent of the 5MS deliverables by 5MS and GS rule commencement including business processes and resource training, resulting in failure of Go Live for 5MS and GS Program</p>	<p>Likelihood: Possible Consequence: Major Rating: Significant</p>	<ul style="list-style-type: none"> GS rule commencement is incremental to 5MS implementations, Business resources are in place supporting current settlement processes with ongoing engagement approach established AEMO Delivery Program on track with testing underway and Market Trial to commence on schedule AEMO business operations in place for rule commencement 	<p>Likelihood: Unlikely Consequence: Major Rating: Medium</p>	
R4	<p>Risk of AEMO cutover failure There is a risk that AEMO systems will not go-live as scheduled with the planned cutover window resulting in an impact to participants' processes and market operations</p>	<p>Likelihood: Possible Consequence: Major Rating: Significant</p>	<ul style="list-style-type: none"> Cutover Planning including trial transitions to prove expected timings and manage impacts on production operations Transition approaches tested successfully with industry during Market Trial Industry Go-Live Plans to be developed to establish production operation timings and review post execution 	<p>Likelihood: Unlikely Consequence: Major Rating: Medium</p>	
R5	<p>Resource constraints due to volume of market change There is a risk that the key resources needed to focus on the upcoming rule changes are not able to do so due to these ongoing production defects as a result of recent changes including 5MS and re-platforming of AEMO systems.</p>	<p>Likelihood: Possible Consequence: Major Rating: Significant</p>	<ul style="list-style-type: none"> Participants to manage their resource schedule and implementation plans GS and MCPI go-live alignment to minimise overlapping change in 1st ½ of 2022 Tfr risk to 2022 Implementation Forum 	TBC based on industry discussion	

May 22 Industry Risks



ID	Description	Inherent Rating	Controls/Comments	Residual Rating	
R6	Insufficient time for industry development for r42 The industry consultation for r42 will push to beyond 10-Dec-21 and therefore into the end of year shutdown period. There is a (low) risk that the industry will not pick up the final r42 files in time for internal development and testing ahead of market trials	Likelihood: Unlikely Consequence: Minor Rating: Low	<ul style="list-style-type: none"> Functionality testing of new / changed fields beyond Shared Isolation Point Field not required prior November 7 release Data migration has been addressed in line with MSDR timeframes Industry testing for May release completed 	Likelihood: Unlikely Consequence: Minor Rating: Low	↑
R7	There is a risk that the schema cannot be sufficiently tested in May-22 as participants won't be ready to test all fields in the schema as/if a sufficient number of participants by role (FRMP, DNSP, MDP) is not ready to engage in testing. Specific focus needs to also be on 'negative testing', i.e. AEMO to not update fields even if provided	Likelihood: Unlikely Consequence: Minor Rating: Low	<ul style="list-style-type: none"> The only field to be communicated for May-22 is the Shared Isolation Point Field. Other changes will not be activated in B2M process prior to 7th November Changes for May available for Industry test from 24th March 	Likelihood: Unlikely Consequence: Minor Rating: Low	↑
R8	Late changes to the schema or procedural documents may result in rework and put regulatory timeline at risk	Likelihood: Unlikely Consequence: Moderate Rating: Medium	<ul style="list-style-type: none"> R42 schema has undergone extensive consultation through the ASWG and an open industry consultation. It is not expected that there will be additional changes post the final version being issued for the May release Procedure consultations took place in 2019 and a consolidation process is due for completion on 31-Jan-21 Tfr to 2022 Implementation Forum 	Likelihood: Unlikely Consequence: Minor Rating: Low	→
R9	Inconsistencies between schema and procedural documents may cause confusion, delays and rework and put regulatory timeline at risk	Likelihood: Unlikely Consequence: Minor Rating: Low	<ul style="list-style-type: none"> Risk for May is low as only changes is the Shared Isolation Point Flag Risk for November may be higher (Tfr to 2022 Implementation forum) 	Likelihood: Unlikely Consequence: Minor Rating: Low	→
R10	BUT Production availability for participant use Production availability of BUT update capability must provide for sufficient opportunity for participant testing prior to release to address potential impacts to participant operations and May 1 GS / MCPI delivery	Likelihood: Possible Consequence: Minor Rating Low	<ul style="list-style-type: none"> Proposed availability date for BUT / SIFP updates confirmed as post May 1 production release AEMO program to support Industry Test period, including issue resolution, prior to production release Delivery date to be revised- tfr risk to 2022 Implementation Forum and rewrite in context of November delivery 	Likelihood: Possible Consequence: Minor Rating Low	↓

May 22 Industry Risks



ID	Description	Inherent Rating	Controls/Comments	Residual Rating	
R11	<p><u>Scope and Delivery timeframes for BUT are still being established</u> Delays in finalising scope and in the delivery of BUT capability have the potential to compress participant timeframes and delay population of SIPF</p>	To Be Rated	<ul style="list-style-type: none"> Tfr to 2022 implementation forum Risk has moved to issue Timeframes for delivery of BUT to be confirmed 		
R12	<p>Market Update Volumes in 2022/ 1st Half 2023 impact participant processing capacity Volume of market updates for Tranche 2 meters, RTC updates, Net to Register CR updates, MSDR standing data updates combined with lack of visibility to consolidated timings for each activity may result in participant inabilities to support total volume of change</p>		<ul style="list-style-type: none"> Rating and mitigations to be agreed 		



Next Steps

- Industry Risks and Issues Register will be updated and published on the website
- Industry Input requested for specific November 2022 industry risks
- Key risks will be reviewed on a monthly basis with new risks and issues being added as they arise
- Mitigation and rerating session to be arranged or included in next Implementation forum
- RWG to provide any additional feedback on risks to GSMSTR@aemo.com.au

Forward Planning & Other Business

Greg Minney



June Implementation Forum Indicative Topics

- Incorporation of May 2023 initiatives
- Industry Test Approach
- MS DR Data transition summary
- Delivery Milestone (November) review
- Industry Risk Assessment

Upcoming Meetings

JUNE

Su	Mo	Tu	We	Th	Fr	Sa
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JULY

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AUGUST

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NOVEMBER

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WORKING GROUPS
Implementation Forum

FOCUS GROUPS
UFE (UFE FG)
Industry Testing (ITFG)
MSDR (MSDR FG)

OTHER
Q&A session
Industry Testing
National Public Holiday
State Public Holiday
AEMO Holiday Closure
*Relevant state has been marked in a comment for VIC, NSW, QLD & SA only.

Questions

