

## GAS RETAIL CONSULTATION FORUM (GRCF)

FOR DISCUSSION	
SUBJECT:	IN003/20W – PRIVACY ADD CDN AND CDR.
PAPER#:	3
CONTACT:	ARJUN PATHY
DATE:	THURSDAY, 25 JUNE 2020

### 1. Purpose

The purpose of this paper is to

- (i) review the Retailer feedback (see attachment A) in relation to privacy and whether a head of power exists for the provision of customer information to ATCO; including AEMO's recommendation and
- (ii) review the participant feedback (see attachment B) in relation to the Gas Market Issue (GMI – IN003/20W (add CDN and CDR transaction); including AEMO's recommendation and
- (iii) discuss next steps and timing that AEMO would like the Gas Retail Consultative Form (GRCF) to consider.

### 2. Background

Currently the lack of an automated transactional-based customer contact details information exchange between ATCO and Retailers means that ATCO cannot easily query a gas retailer to check customer details, which results in manual requests for information and in spreadsheets<sup>1</sup> being shared between businesses. ATCO are responsible for undertaking works including reconnections, planned and unplanned interruptions, and meter replacement works. These works generally require the network to communicate with customers and frequently the network is unsure of the details they have or wishes to recheck those details. This frequently results in ATCO asking retailers to manually produce customer information and re-send it to them to support communications to customers. In particular, this becomes a substantial burden when dealing with unplanned outages and very short time frames

ATCO have proposed that the WA gas retail market adopt the CustomerDetailsNotification (CDN) and CustomerDetailsRequest (CDR) transactions which will require all Retailers, ATCO and AEMO to make IT system changes. Those participants that use the FRC Hub will also need to modify their system accommodate an uplift of the aseXML schema version from r13 to r38<sup>1</sup>. A similar proposal is being considered in the east coast gas retail markets.

These transactions were enhanced in February 2019 and were applied to r38 of the aseXML schema version r38. East coast retail gas market participants will likely transition to schema version r38 in Q4 2021, and this offers an opportunity for the WA gas retail market to integrate into that program of work.

### 3. Discussion

Attachment A contains the feedback that was received in relation to privacy and whether a head of power exists for the provision of customer information to ATCO. The following is an overall summary of the responses received:

- All respondents except for Simply Energy expressed that the provision of customer information to ATCO Gas for meter replacement purposes would meet retailers' privacy obligations.

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<sup>1</sup> If the initiative for IN002/15W (add new JEC) is approved, then whatever version of the aseXML schema include the new JEC that version (beyond r38) will be adopted.

- All respondents except for Simply Energy and Synergy expressed that their supply contracts with customers allow for the transmission of customer information to ATCO Gas for meter replacement purposes.

Attachment B contains the feedback that was received in relation to the desirability of the changes. The following is an overall summary of the responses received:

- All respondents supported the initiative.
- No respondent disagreed with AEMO's proposal to bundle the changes proposed here with the east coast's Gas Life Support (IN003/20) system changes.

Given that the majority of participants supported this initiative, AEMO recommends that this proposal now move into a formal procedure consultation, which will involve issuing a Procedure Change Request (PCR) request on Monday 6 July 2020. Given that the current GMI contains well-formed requirements, participants should now undertake a more detailed assessment on the costs and benefits in order to ascertain if the benefits outweigh the costs. Given consistent GRCF feedback that the implementation of CDN/CDR should be bundled with Gas Life Support (IN003/20) changes, cost and benefit estimates should be incremental on the changes required for gas life support (e.g. efficiency benefits that would already be delivered as part of the Gas Life Support changes should not also be reported as benefits here, and IT development costs that would already be required as part of the Gas Life Support changes should not be reported as costs here). This information needs to be included in the PPC feedback due 3 August 2020.

AEMO notes that several participants raised questions about whether a head of power exists for the provision of customer information to ATCO Gas for meter replacement purposes. As such, AEMO does not believe it would be appropriate for the Technical Protocols to mandate (e.g. "must" provide the transaction) the use of CDN and CDR transactions for this purpose; instead, AEMO proposes to make the use of such transactions optional (e.g. "may" provide the transaction) in the Technical Protocols such that participants can seek their own legal advice regarding the transactions' use.

AEMO further notes in response to participant feedback that consultation IN003/20W will **not** address any industry-agreed guides for CSV data transmission. Such a guideline concerns neither the Retail Market Procedures nor the Technical Protocols and as such falls outside of AEMO's and the GRCF's remit. If WA gas retail market participants do decide on an agreed guideline, AEMO is willing to publish this guideline on the AEMO website on behalf of industry for ease of access, but this guideline would remain outside the suite of AEMO-authorised guidelines and procedures.

#### 4. Matters for the GRCF to consider

AEMO seeks feedback from the GRCF at the 25 June meeting on the following:

- (1) Given the lack of consensus regarding whether a head of power exists for the provision of customer information to ATCO Gas for meter replacement purposes, does the GRCF agree with AEMO's recommendation to make the use of CDN and CDR transactions optional (eg "may" provide the transaction) in the proposed Technical Protocols?
- (2) Does the GRCF agree that there is sufficient consensus on the initiative to warrant AEMO's proceeding with a PCR for the change?
- (3) Assuming there is a consensus on (1) and (2), does the GRCF agree with AEMO's recommendation to issue a PCR by 6 July 2020?

**Attachment A** - Consolidated feedback on the questions put forward on to privacy and whether a head of power exists for the provision of customer information to ATCO.

Question	Company	Participant Response
1. Does the provision of customer information to ATCO Gas for meter replacement purposes meets retailers' privacy obligations?	AGL	Yes, the exchange of customer information for these purposes is contemplated under AGL's privacy policy.
	Agora Retail	Agora Retail believes that there is data transmitted that would meet the definition of personal information pursuant to the Privacy Act.
	Alinta	Yes. Alinta Energy's Privacy Policy allows us to disclose the information in the Customer Details Notification (CDN) transaction (including, for each MIRN, the information outlined in the FRC B2B System Interface Definitions document) if the purpose of providing this information is for the purposes of providing gas services to the customer.
	Origin Energy	Yes, the provision of customer information to ATCO Gas for meter replacement purposes meets retailers' privacy obligations.
	Simply Energy	There is no prescriptive answer to this as Simply Energy believes that Clause 21 'Confidentiality and Information Exchange' of the ATCO Gas Access Arrangement as well as with the obligations set out in the Energy Coordination (Customer Contracts) Regulations 2004 does not clearly articulate the intent to provision confidential information, where the request for customer data is intended to be used for the purpose of maintaining network devices (exchanging, removing, maintaining, etc.).
	Synergy	<p>Synergy has reviewed its operations and procedures and considers the provision of customer details to ATCO under the Retail Market Procedures is consistent with our privacy obligations. Synergy's privacy obligations are outlined in its privacy policy which can be found at the following link <a href="https://www.synergy.net.au/privacy">https://www.synergy.net.au/privacy</a>. Under Synergy's privacy policy, Synergy may disclose customer details to parties who are part of Synergy's processes to deliver services, for the purposes referred to in the privacy policy. This includes providing customers with gas supply services (they have requested) and to assist customers by providing them support.</p> <p>The parties that Synergy may disclose customer details to include network operators such as ATCO. Synergy will only disclose a customer's personal information to these (third) parties:</p> <ul style="list-style-type: none"> <li>• for the purposes set out in Synergy's privacy policy or any agreement Synergy has with the customer;</li> <li>• in circumstances permitted by the Australian Privacy Principles;</li> <li>• if Synergy is otherwise required or authorised by law; or</li> </ul>

Question	Company	Participant Response
		<ul style="list-style-type: none"> <li>if the disclosure is made with the customer's consent.</li> </ul>
	Wesfarmers Kleenheat	Yes. KH's privacy policy and collection of information statement (COIS) specifies that Kleenheat may from time to time provide personal information collected from customers to the natural gas distributor, i.e. ATCO.
2. If the provision of customer information meets retailers' privacy obligations, retailers are to confirm that their supply contracts with their customers allow for this exchange of customer information to ATCO gas	AGL	Yes, the exchange of customer information for this purpose is allowed.
	Agora Retail	Agora Retail believes that its current retail contract clauses permit this disclosure and is seeking further legal advice to ensure that it is fully compliant with the requirements of the National Privacy Principles.
	Alinta	Yes. Both Alinta Energy's standard form and non-standard contracts include a statement that a customer's personal information will only be disclosed in accordance with relevant legislation and with our Privacy Policy.
	Origin Energy	Yes. Origin Energy's Terms & Conditions provide that the Distributor is responsible for the distribution and supply of gas and will do what is required in that respect. Origin Energy will provide personal information of the customer to the distributor for the carrying out of the distributor's role.
	Simply Energy	Under the published Market Ts and Cs, Simply Energy is required to keep confidential information in accordance with relevant regulations unless a disclosure is required to comply with any legal or regulatory requirement.
	Synergy	<p>Synergy understands the only customer details that ATCO is seeking is:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Email</li> <li>Mobile phone number</li> </ul> <p>Therefore, Synergy considers its privacy policy and supply contracts allow for this exchange of information to ATCO gas.</p> <p>Note – Given Synergy responds made reference only a sub set on the fields described in GMI attachments e-mailed on the 22nd May, AEMO ask Synergy the following question. For the CDN transaction the following fields are noted in the GMI attachments - NMI, NMI Check, Customer Name, Business Name, Business Contact Name, Postal Address, Deliver Point Identifier Phone1, Phone2,emailaddress, SensitiveLoad, Movement Type and Last Modified date, noting the fields above, does the last sentences "Therefore, Synergy considers its privacy policy and supply</p>

Question	Company	Participant Response
		<p>contracts allow for this exchange of information to ATCO gas" response provided as feedback still stand or do you want to changes your feedback to something else</p> <p>Synergy's response is contained below :</p> <p>Thanks for your email and the opportunity for Synergy to clarify its position. Our feedback only relates to situations where the network operator needs to directly contact a customer to give effect to a network (covered) service for the customer.</p> <p>Our technology team is still reviewing the proposed build pack changes (including the mandatory and optional data fields and the r38 schema uplift) from a technical and operational perspective; and are still consulting with internal stakeholders.</p> <p>R38 schema uplift, build pack and retail market procedure – using customer data</p> <p>However, we recognise the build pack cannot be inconsistent with the applicable laws that apply in a particular state. In our view the build pack, in itself, cannot create or force a regulatory obligation. The impact of the additional information below (outlined in the build pack as part of the r38 schema uplift) was not readily apparent in the GMI (and questionnaire) - in relation to the extent WA participants have a regulatory obligation to collect, maintain, keep accurate and disclose the information to the network operator for:</p> <ul style="list-style-type: none"> <li>- Postal address</li> <li>- Sensitive load (and life support)</li> </ul> <p>It is also not clear in the GMI how the network operator (under the Retail Market Procedures) is permitted to use this information. The information below also appears to correspond to electricity transactions (Eg. reference in the build pack to NMI, sensitive load and life support) in WA and the NEM. In addition, the WA Retail Market Procedure (RMP) may not align with the NEM gas regulations in relation to these matters. Therefore, our view is that it should not be mandatory to disclose such information in WA and the applicable build pack data fields for WA should be marked as "optional" or "not applicable" – in relation to the schema uplift to r38.</p> <p>This additional data, for electricity, is regulated and coordinated separately (from privacy legislation) in WA under the WA Metering Code, Network Supply Reliability Code and Small Use Customer Code of Conduct. For example, the Metering Code requires "postal address" to be disclosed specifically for (network operator) outage notification purposes in accordance with the Network Supply Reliability Code and cannot be used for any other purpose. The electricity legislation in WA also provides a head of power that requires this type of information to be collected, maintained in a timely manner, disclosed and kept accurate.</p>

Question	Company	Participant Response
		<p>Please note “postal address” is also used in the WA electricity market for the network operator to notify customers of a network curtailment. However, I think curtailment of the gas distribution networks in WA may follow a different process.</p> <p>Therefore, our questionnaire feedback does not cover these additional matters which are not regulated under the RMP (or do not have a head of power under the RMP). In particular, Synergy would need to understand what constitutes “sensitive load” (or life support) and how it works under the gas RMP and the provision of a (covered) network service. We would also need to understand how “postal address” will be used by the network operator under the RMP. That is, whether it is required for outage notification, curtailment and/or correspondence with the customer. Therefore, our feedback does not apply to this additional information – that is in particular information in relation to:</p> <ul style="list-style-type: none"> <li>- Postal address</li> <li>- Sensitive load</li> </ul> <p>We also note that “street address” already forms part of the data in the registry for the MIRN which the network operator has access too.</p> <p>Scope of our feedback and interim guideline</p> <p>Therefore, our feedback relates to disclosing only the necessary information to the network operator for the network operator to directly contact a customer to give effect to a network (covered) service for the customer (Eg. connections, disconnections, meter change, meter read, meter test... etc). It is not clear to us how and when the network operator will use data in relation to “postal address” and “sensitive load” and the retailers obligation to collect, maintain and ensure this data is accurate. WA electricity regulations and operational processes around registering, updating and using (life support) sensitive load data is substantial.</p> <p>We note the additional customer information has also been included in the interim guideline.</p> <p>Please note our view of the guideline is that it is an interim voluntary guide in relation to disclosing information to the network operator – to the extent it is consistent with Synergy’s privacy policy and applicable regulations. We will be adding this feedback to our response on the guideline due this Friday.</p> <p>I understand the IN003/20W is evolving from its original scope of assisting the network operator with MIRN connections and disconnections – where the network operator needs to directly contact the customer. Therefore, we consider it is important to understand and align the regulatory, operational and technical requirement for each item of data. We expect this will normally occur as the IN003/20W and r38 schema uplift progresses through the various consultation stages.</p>

Question	Company	Participant Response
	Wesfarmers Kleenheat	Yes. Both our small and large use contracts specifies that the network operator may replace metering equipment/meters. This, read in conjunction with the privacy policy and COIS, in our view enables an exchange of personal information to operate between ATCO and Kleenheat's customer base.
3. Any other comments on the topic of provision of customer information pertaining to this initiative	AGL	<p>The Template Service Agreement between ATCO and users provides a contractual basis for the disclosure, exchange and protection of confidential information. See Appendix A for a relevant extract of the agreement.</p> <p>Any customer information provided by a user to ATCO must be treated as confidential information in accordance with the definition of this term and as set out in clause 21.1(a)(i). Further noting the obligations in clause 21.3 to comply with any privacy requirements in relation to information exchanged.</p> <p>As detailed by Alinta, the format for the exchange of information between ATCO and users must comply with clause 21.4. Also noting that any confidential information must only be used in connection with the exercise of a party's right or performance of its obligation under the agreement (clause 21.1(a)(i)(B)).</p>
	Agora Retail	No further comments.
	Alinta	<p>A "head of power" for the provision of customer data by the retailer to the network operator is not immediately obvious.</p> <p>Clause 3.5.2.1(i) of the AGA Code infers a distributor would have the relevant customer information needed to contact a customer if required:</p>

Question	Company	Participant Response
		<p>undertake inspections, repairs, testing or maintenance of the <i>distribution system</i> at the <i>supply address</i>, shall give the <i>customer</i> at that <i>supply address</i> notice of its intention.</p> <p>Clause 33(3) of the <i>Energy Coordination (Customer Contracts) Regulations 2004</i> includes:</p> <p>(3) A standard form contract must include provisions that have the same effect as clause 3.5.2 of the AGA Code.</p> <p>Note for this regulation:</p> <p>Clause 3.5.2 of the AGA Code sets out notice and identification requirements to be observed when access to a supply address is sought.</p> <p><b>3.5.2 Obligations on a Supplier or a Distributor</b></p> <p>3.5.2.1 (i) Except in the case of an <i>emergency</i>, suspected illegal use, or routine <i>meter</i> replacements, or the <i>customer</i> consenting to a shorter time, a <i>supplier</i> or <i>distributor</i> intending to</p> <p>It should be noted that the Customer Contracts Regulations were under review by the PUO (now EPWA) in 2019 and amendments have not yet been finalised. If a head of power is still being sought it may be worth raising with EPWA whether a suitable amendment can be included here.</p> <p>-</p>
	Origin Energy	<p>Origin Energy seek clarification on the manner in which the information will be disclosed and stored. In addition, will the appropriate IT Security and Risk assessments be undertaken?</p> <p>Who will be providing this assurance i.e. AEMO or ATCO?</p>
	Simply Energy	<p>The market contract terms has an obligation on customer in relation to 'Meters and gas supply equipment', that in order to allow the supply of gas to the premises, customer must give their retailer, distributor and other relevant people (including any meter service provider), who provide their official identification if requested, safe, convenient, easy and unrestricted access to the premises, the gas supply equipment, the distribution network and the meter at the premises including to read the meter, to install gas supply equipment, to inspect or work on your equipment or the gas supply equipment, or for any other reason relating to the supply of gas at their premises.</p>



Question	Company	Participant Response
		In absence of a clear obligation on retailers to provide customer data to the distributor for the purposes mentioned above, Simply Energy suggests that ATCO may want to raise a 'variation' to the current template service agreement (Access Arrangement), and include the 'provisioning of customer data', for specific reasons, as a binding obligation instead of seeking interpretational responses from individual retailers.
	Synergy	<p>Cyber security considerations – CDN lifecycle</p> <p>In addition, to the procedural consideration (discussed above) Synergy considers that we should not lose sight of the technology risks or implications for the end-to-end CDN process. Synergy understand that, if approved, the CDN transaction will form part of the build pack and all participants would be subject to the confidentiality provision in the Retail Market Procedure (Part 8.2) and Access Contract between Synergy and ATCO. However, Synergy notes that Part 8.2 does not expressly discuss cyber security requirements.</p> <p>Therefore, Synergy considers it would be good to have more information on ATCO's cyber security mechanisms. For example, how and where the information will be stored and managed (and disposed where required). Synergy's privacy policy requires Synergy to store customer information securely, so we need to make sure that the (end-to-end) CDN process and lifecycle is consistent with our policy.</p>
	Wesfarmers Kleenheat	Yes. KH's privacy policy and collection of information statement (COIS) specifies that Kleenheat may from time to time provide personal information collected from customers to the natural gas distributor, i.e. ATCO.

## Attachment B - Consolidated feedback on the questions put forward on IN003/20W – (Add CDN and CDR)

Question	Company	Participant Response
1. In terms of the overall technical design of this proposal (see section 4 of the GMI – e.g. moving to a non-Comma-Separated Values (CSV) file in the aseXML payload and adding the CDR aseXML transaction to suit of gas retail transactions), does your organisation support the proposal as it is described in the GMI? If not, what changes need to be made in order to gain your support?	AGL	AGL supports this proposed change
	Agora Retail	Agora Retail supports the approach as proposed in the GMI.
	Simply Energy	Simply Energy would agree to make CDN/CDR transaction from csv to xml, when harmonised with other Gas jurisdictions, to avoid bespoke-build requirements for WA Gas.
	Alinta	Alinta Energy supports the overall technical design to:  1. Replace the existing version of the CDN transaction with an aseXML-payload version that does not contain the CSV file format;  2. Add the CDR transaction to the suit of aseXML transactions to allow the network operator to request confirmation of customer information from the user; and  3. Upgrade the existing schema from the current version r13 to r38
	Origin Energy	In terms of overall technical design of this proposal, Origin Energy support moving to a non-Comma-Separated Values (CSV) file in the aseXML payload.  Origin Energy understand a CDR is currently being proposed for the East Coast market and if accepted across all jurisdictions will support the CDR aseXML transaction for WA.  This is because Origin Energy believe this proposal is best bundled with various other gas market changes i.e. life support, CDN/CDR for East Coast.
	Kleenheat	Yes, Kleenheat are supportive of the proposed technical design.
	Synergy	Synergy understands the proposed design will involve a schema uplift to r38. Implementation is proposed for Q4 2021. Synergy supports this technical design.  In the meantime Synergy understands that it is proposed participants implement a voluntary and manual process for exchanging CDR and CDN data using emails and CSV files.  In relation to security Synergy considers that there are two elements that will need to be considered:  • How the data is transmitted or delivered; and

Question	Company	Participant Response
		<ul style="list-style-type: none"> <li>How the data will be stored and used at the destination.</li> </ul> <p>Synergy does not support the proposed interim (email) approach to delivery, as we believe this introduces significant cyber security risk. Synergy would support a method such as sftp to transmit CDR and CDN csv files, which provides a more secure framework for data transfer.</p>
	ATCO	ATCO supports the technical design proposed in section 4 of the GMI
2. In terms of the prioritisation and timeline (see section 3 of the GMI – e.g. most cost effective and efficient means to implement the changes set out in the GMI would be to include the change in the east coast gas life support (GLS) program of work), does your organisation support the idea of bundling these changes with the east coast GLS program of work (if this program of work goes ahead)? If not, what changes need to be made in order to gain your support? .	AGL	AGL sees benefit and efficiencies in aligning this change with other similar changes
	Agora Retail	Agora Retail has no issue with the timing of the proposed changes an inclusion with the eastern states life support program of work but would not support the change to XML payload (and consequential schema change) if this initiative was only required to support the convergence to life support processes in the eastern jurisdictions
	Simply Energy	Yes, Simply Energy supports this proposal
	Alinta	<p>Alinta Energy supports the proposal to align the recommended changes with the east coast gas life support program of work so as to reduce the associated costs.</p> <p>The proposed timeframe of Q4 (Dec) 2021 may pose a few challenges to our business due to the planned implementation of new internal systems and processes.</p>
	Origin Energy	<p>As per response to Question 1, Origin Energy supports this change if bundled with other East Coast and WA changes. This will also mean that testing for all transactions can be done at the same time creating efficiency.</p> <p>In terms of timeline, Origin Energy recommend AEMO implement this GMI post Q4 2021 due to several Retail initiatives currently being prioritised. Q4 2022 is the optimum time to implement all gas changes.</p> <p>The deferral of 5MS is proposed for 1 July 2022. Should this rule change take affect this presents a risk to deliver Gas market changes prior to 1 July 2022. Compounding this are other initiatives, such as Wholesale Demand Response, Energy Consumer Rights, MSATS Standing Data Review (including Planned Interruption) and Customer Switching are proposed to be delivered 2021 or spill into 2022. Therefore, Q4, 2022 or later presents the least risk and optimal time to deliver for CDN/CDR for WA.</p>

Question	Company	Participant Response
	Kleenheat	<p>Kleenheat is unable to provide an estimation as to how this work would be prioritized by our business. Our timeline is heavily influenced by</p> <p>a) whether this proposal became mandatory for retailers to implement; and</p> <p>b) what the planned implementation date would be.</p> <p>Kleenheat would like at least 6 months' notice from the planned implementation date</p>
	Synergy	<p>Synergy recognises that other industry participants (on the high volume interface) may benefit from this system change. Therefore, Synergy considers, if the change is widely supported, it would be sensible to coordinate the schema uplift in WA with the GLS program of work - to Synergy recognises that other industry participants (on the high volume interface) may benefit from this system change. Therefore, Synergy considers, if the change is widely supported, it would be sensible to coordinate the schema uplift in WA with the GLS program of work - to the extent it creates efficiencies in system integration testing with participants and the efficient resolution of defects.</p> <p>Given this Synergy supports the above position on bundling.</p>
	ATCO	<p>ATCO proposed the introduction of the transactions in WA gas retail market to support its obligations for ATCO to manage customer details. ATCO believes the inclusion of this proposal into the east coast r38 program would be an effective means to implement the changes.</p>
3. In terms of the likely benefits (see section 6 of the GMI), does your organisation agree with the points raised in this section? Also does your organisation expect that the benefits will outweigh the costs?	AGL	AGL agrees with the benefits
	Agora Retail	<p>Agora Retail agrees that the benefits are likely to outweigh the costs in a scenario where there is a clear driver to move from CSV email attachments to embedded XML, but do not agree that this is warranted in the WA jurisdiction without a life support requirement. Should other initiatives necessitate a schema change in WA, Agora Retail would support the change.</p>
	Simply Energy	<p>Simply Energy is fairly aligned with the benefits, however not when WA Gas changes are assessed in isolation.</p>
	Alinta	<p>In the longer term, the benefits of implementing this proposal will outweigh the costs by reducing the issues associated with manual data transactions.</p>

Question	Company	Participant Response
	Origin Energy	In addition to the benefits outlined in section 6 of the GMI, the implementation of an automated exchange does reduce the manual effort required to provide this information. There is also benefit in uplifting all jurisdictions to the same schema. However, our analysis revealed the cost to implement outweighs the benefits from a Retailer perspective, as most benefits are intangible.
	Kleenheat	There are no tangible benefits for Kleenheat itself in terms of cost savings etc however we can see the benefit flowing to customers of this proposal
	Synergy	Synergy uses the low volume interfaces and has previously advised that it considers that there is likely to be material costs involved with implementing a schema uplift. Therefore, given Synergy's low level of disconnection service requests. Synergy does not consider it will realise any material benefits or reduced operational costs from implementing this change.
	ATCO	ATCO agrees there are benefits to introducing these transactions in WA gas market. As noted in section 6 of this includes improvement to customer data quality and management to support ATCO's safe and reliable provision of delivery point reconnections, planned interruptions for maintenance and dealing with unplanned interruptions.
4. Any other comments on this proposal?	AGL	No further comment
	Agora Retail	No further comments.
	Simply Energy	
	Alinta	As noted above, the timing of new system implementations may present some challenges concerning the required schema upgrade, however we would be happy to work through these with AEMO. One option may be. that we continue our current work around with ATCO until we transition to our new system.
	Origin Energy	
	Kleenheat	
	Synergy	R38 schema uplift, build pack and retail market procedure – using customer data

Question	Company	Participant Response
		<p>Synergy considers the build pack outlines the detailed technical specifications (file formats, protocols and timeframes) as to how data and information communication is to be implemented between participants for business-to-business communication. Including how the necessary information systems are to be designed and developed.</p> <p>Therefore, Synergy considers the build pack cannot be inconsistent with the applicable laws that apply in a particular jurisdiction. In our view the build pack, in itself, cannot create or force a regulatory obligation. The impact of the additional information below (outlined in the build pack as part of the r38 schema uplift) needs to be considered within the WA regulatory framework:</p> <ul style="list-style-type: none"> <li>• Postal address</li> <li>• Sensitive load (and life support)</li> </ul> <p>For example, in relation to the extent WA participants have a regulatory obligation to collect, maintain, keep accurate and disclose this information to the network operator. There also needs to be regulatory certainty in relation to how the network operator is permitted to use this information under the WA retail market scheme.</p> <p>The WA Retail Market Procedure (RMP) may not provide sufficient regulatory certainty or align with the NEM gas regulations in relation to these matters. Therefore, our view is that it should not be mandatory to disclose such information in WA and the applicable build pack data fields for WA should be marked as “optional” or “not applicable” – in relation to the schema uplift to r38.</p> <p>This type of additional data, for electricity, is regulated and coordinated in WA under the WA Metering Code, Network Supply Reliability Code and Small Use Customer Code of Conduct. For example, the Metering Code requires “postal address” to be disclosed specifically for (network operator) outage notification purposes in accordance with the Network Supply Reliability Code and cannot be used for any other purpose. The electricity legislation in WA also provides a head of power that requires this type of information to be collected, maintained in a timely manner, disclosed and kept accurate.</p> <p>Please note “postal address” is also used in the WA electricity market for the network operator to notify customers of a network curtailment. However, I think curtailment of the gas distribution networks in WA may follow a different process.</p> <p>In particular, WA participants would need to understand what constitutes “sensitive load” (or life support) and how it works under the gas RMP and the provision of a (covered) network service. Participants would also need to understand how “postal address” will be used by the network operator under the RMP. That is, whether it is required for outage notification, curtailment and/or correspondence with the customer. Noting that “street address” already forms part of the data in the registry for the MIRN which the network operator has access too. Therefore, our feedback</p>

Question	Company	Participant Response
		<p>relates to disclosing only the necessary information to the network operator for the network operator to directly contact a customer to give effect to a network (covered) service for the customer (Eg. connections, disconnections, meter change, meter read, meter test... etc). It is not clear to us how and when the network operator is permitted to use data in relation to “postal address” and “sensitive load” and the retailers obligation to collect, maintain and ensure this data is accurate. WA electricity regulations and operational processes around registering, updating and using (life support) sensitive load data is substantial.</p> <p>We note this additional customer information has also been included in the interim guideline. Our view of the guideline is that it is an interim voluntary guide in relation to disclosing information to the network operator – to the extent it is consistent with Synergy’s privacy policy and applicable regulations. We understand IN003/20W is evolving. Therefore, we consider it is important to understand and align the regulatory, operational and technical requirement for each item of data.</p>
	ATCO	<p>ATCO has no further comments on this specific proposal, however we also note and support the industry guide that is being developed ahead of the potential introduction of IN003/20W.</p>

## Attachment B-

### Ref 1 – Gas Market Issue (GMI) – IN011/20 (CDN and CDR)



GMI -IN011-20 CDN CDR v3.pdf

### Ref 2 – Participant Build Pack 3 - Interface Definitions (marked up changes)



Participant Build Pack 3 B2B System Interface Definitions v3.7 (Marked up - includes IN011-20).pdf