GAS MARKET ISSUE (GMI)

Summary Section

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Issue Number	IN001-22		
Version #	1.0		
Impacted Jurisdiction(s)	South Australia		
Proponent	Danny McGowan	**Company**	AEMO
Proponent e-mail	grcf@aemo.com.au	**Proponent phone #**	
Affected Gas Market(s)	• Retail	**Date lodged with AEMO.**	Thursday, 28 October 2021
Short Issue Title	Minor changes to the SA RMPs that involving adding further clarity to Customer Own Read process.		

Other key contact information

VERSION #	PRESENTED TO	DATE
1	GRCF	18 October 2022

GAS MARKET ISSUE – DETAILED REPORT SECTION

1. DESCRIPTION OF ISSUE

Background

The South Australian Retail Market Procedures (SA SMP) provided very little information about Customer Own Reads (COR) prior to 2020. In 2019 in collaboration with participants, AEMO completed a full review of the SA RMP with a view towards harmonising the SA RMP with the other gas retail market jurisdictions. This review resulted in substantial rewording of many of the existing definitions and clauses within the SA RMP, including providing information about Customer Own Reads. The scope of these changes was not to alter any of the existing obligations placed on participants or AEMO. The updated SA RMP came into effect in February 2020.

Issue

AEMO recently reviewed the SA RMP and identified that the current wording pertaining to Customer Own Reads could be improved with a minor change to one of the existing definitions and the inclusion of a note in clause 3.5.2. See section 4 of the GMI for further details. These changes are very minor but add further clarity to the SA RMP and do not alter any of the existing obligations or IT processor.

Matters for the Gas Retail Consultative Forum (GRCF) to consider.

AEMO seeks feedback from the GRCF at the 18 October meeting on whether changes described in this GMI raises any material issues that should be considered before AEMO commences the formal consultation process.

If no material issues are raised, the changes described in this GMI will proceed to the formal consultation stage.

IMPORTANT: In relation to this initiative, the scope of works to amend the SA RMP is limited to the issue described above.

2. REFERENCE DOCUMENTATION

South Australian Retail Market Procedures ver 19.0

3. PRIORITISATION AND TIMELINES

The GRCF endorsed IN001/22 as an item for the 2022 program of work in the 2022 GRCF Prioritisation Session in October 2021[1]. As such, IN001/22 is to be addressed in 2022.

If the pre-consultation does not raise any material issues, then the proposed tentative timeline is as follows:

- PPC issued early November 2022
- PPC feedback late November 2022
- IIR issued early December 2022
- IIR feedback closes early January 2023
- AEMO Decision issued early February 2023
- Effective date on 31 March 2023

[1] Please see minutes from the 28 October 2021 GRCF meeting - https://aemo.com.au/consultations/industry-forums-and-working-groups/list-of-industry-forums-and-working-groups/gas-retail-consultative-forum

4. SPECIFIC PROPOSAL

To improve the readability of the SA RMPs, the proposal involves:

a) Add a note in clause 3.5 (Calculation of Metering Data) that indication CORs are processed in accordance with these sub clauses, which is consistent with the clause 3.1.4 (b) (Customer Own Read).

b) Delete the reference to Customer Own Read in the definition of estimated meter reading.

Attachment A shows the above changes in track-change mode.

5. IMPACTS OF CHANGE

There are no process or IT system impacts as the changes are documentation only.

6. LIKELY BENEFITS

The benefits are intangible in nature. The changes will improve that readability of the RMP and add further clarity in terms of the customer own read process.

7. IMPACT OF ISSUE NOT PROCEEDING

If the changes identified in this GMI do not proceed, the benefit of improving the readability of the RMP and adding further clarity to customer own read process will not be attained.

8. SUPPORTING DOCUMENTATION

See attached.

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GAS MARKET ISSUE – ATTACHMENT A

Blue underline means addition and ~~red strikeout~~ means delete

SA RMP changes for COR (IN001-22) - Extracts

estimated meter reading	An estimate of an *actual meter reading* made under clause 3.5.3 in accordance with an *approved estimation methodology* ~~or a *Customer-own read*~~. Except in clause 3.5.4, it does not include an *estimated meter reading* designated to be a *substituted meter reading*.

3.1.4. Customer-own reads

If, following the failure by a *Network Operator* to read a meter, or for any other reason consistent with applicable laws, the Customer of a *Retailer* provides a *Customer-own read*:

(a) to its *Retailer*, the *Retailer* must use its reasonable endeavours to provide the *Customer-own read* to the *Network Operator* by 5.00 pm on the next *business day* after the day on which it was received from the *Customer*.

(b) to the *Network Operator*, the *Network Operator* must process the *Customer-own read* in accordance with clauses 3.4 to 3.7.

3.4. Validation of Meter Readings

A *Network Operator* must *validate* a *meter reading* for the purposes of these Procedures in accordance with an *approved validation methodology*, before providing *metering data* to a *User* or *AEMO*.

3.5. Calculation of Metering Data

3.5.1. Consumed energy

A *Network Operator* must calculate the *consumed energy* for a *metering period* in accordance with clauses 3.5.2 to 3.5.4, before providing *metering data* to a *User* or *AEMO*.

3.5.2. Actual meter readings

A *Network Operator* must use an *actual meter reading* to calculate *consumed energy* if:

(a) the *Network Operator* has obtained an *actual meter reading* for the *delivery point* since the previous *meter reading* of the *delivery point*; and

(b) the *Network Operator* is able to validate the *actual meter reading*; and

(c) the *Network Operator* does not otherwise reasonably suspect an error in the *actual meter reading*, the *heating value* or other associated data.

Note: For the avoidance of doubt, as described in clause 3.1.4 (b), the *Customer-own read* will be processed in accordance with this clause, and if the *Network Operator* is not able to validate the *actual meter reading*, then the process described in 3.5.3 will be applied.

3.5.3. Estimated meter readings

(a) A *Network Operator* must calculate an *estimated meter reading* in accordance with an *approved estimation methodology* if any one or more of the following applies in relation to a *scheduled meter reading*:

(i) the *Network Operator* has not obtained an *actual meter reading* for the *delivery point* since the previous *meter reading* of the *delivery point*; or

(ii) the *Network Operator* is unable to validate an *actual meter reading*; or

(iii) the *Network Operator* otherwise suspects an error in the *actual meter reading*, the *heating value* or other associated data.

(b) If the *Network Operator* calculates the *consumed energy* for a *delivery point* based on an *estimated meter reading*, then:

(i) the *Network Operator*, acting reasonably, may replace the *estimated meter reading* with:

(A) a *substituted meter reading*;

(B) a *Customer-own read*; or

(C) if the *Network Operator* reasonably determines that it has grounds for calculating a more accurate *estimated meter reading* — the further *estimated meter reading*; and

(ii) for the purposes of paragraph (b)(i)(A), the *Network Operator* must consider any reasonable request from a *current User* for an *estimated meter reading* to be changed.

3.5.4. Substituted meter readings