GAS MARKET ISSUE (GMI)

Summary Section
For Proponent or AEMO to complete. Template focuses on issue identification and impact.

Issue Number	IN008/19		
Version #	1		
Impacted Jurisdiction(s)	Victoria, Queensland, SA and NSW/ACT		
Proponent	Mark Riley	**Company**	AGL
Proponent e-mail	mriley@agl.com.au	**Proponent phone #**	0475 805 262
Affected Gas Market(s)	• Retail	**Date lodged with AEMO.**	Monday, 8 April 2019
Short Issue Title	Customer Own Reads – Delivery of Data		

Other key contact information

VERSION #	PRESENTED TO	DATE
1	GRCF	18 October 2022

GAS MARKET ISSUE – DETAILED REPORT SECTION

1. DESCRIPTION OF ISSUE

The Retail Market Procedures require the retailer and network operator to use reasonable endeavours to share a Customer Own Reads (CoRs) by 5.00 pm the business day following the day the CoR is received.

With the increased availability of mechanisms for customers to provide their own meter reading, it has been identified that a reasonable portion of customers are submitting CoRs very frequently (eg daily, weekly etc.).

As such, the various procedural obligations to share these CoRs becomes an unnecessary burden on both the retailer and distributor to manage the larger number of meter data reads.

This issue was first raised in April 2019 as part of the IN006/17 (Amend the SA RMP to be more aligned with east coast jurisdictions) consultation. See attachment 3 for further details.

[Following section added by AEMO]

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.

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2. REFERENCE DOCUMENTATION

Retail Market Procedures VIC, QLD, SA and NSW-ACT

3. PRIORITISATION AND TIMELINES

These proposed changes can be included when the various procedures are being consulted on for other matters.

AGL proposes that for efficiency, once the IIR has completed, the amendments be bundled with other changes, unless there is a likely significant delay.

[Following section added by AEMO]

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

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4. SPECIFIC PROPOSAL

AGL proposes to leave the current obligations for the delivery of Customer Own Reads between Network and Retailer as the minimum requirement but include an additional clause in these obligations that allows the information to be shared between the parties at an agreed frequency (eg 1 read / month).

5. IMPACTS OF CHANGE

Not making the amendments to the various Retail Market Procedures is likely to leave participants open to administrative non-compliances in this matter or force excessive data provisions which neither party needs nor wants.

6. LIKELY BENEFITS

Inclusion of the proposed procedural change will eliminate any consideration of an administrative non-compliance and allow participants to operate in an effective and efficient manner, which meets the Objectives of the NERR.

7. IMPACT OF ISSUE NOT PROCEEDING

Unnecessary processing and delivery of information may be required if procedure changes were not made or time and energy wasted due to management of administrative non-compliances.

8. SUPPORTING DOCUMENTATION

Refer to Attachment 1, 2 and 3

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GAS MARKET ISSUE – RELEVANT ATTACHMENT(S)

ATTACHMENT 1 – PROCEDURE AMENDMENTS

Victorian RMP Proposed Amendments

2.1.5 Provision of Meter Reading Information

……..

(iiib) where the *Distributor* has been provided a *customer-own read* by the *FRO* and the *Distributor* reasonably considers the *customer own read* to be accurate, the *Distributor* must use its reasonable endeavours to provide the *FRO* with the following information;

(A) the day on which the *meter* was read; and

(B) the *validated meter reading* for that *meter*,

by 5.00 pm on the first *business day* following the day on which the *customer-own read* was received by the *Distributor*, or at a time and frequency agreed by the parties.

……

(vi) where details of a *customer-own read* are provided by the *customer* in writing to the Distributor, the *Distributor* must use its reasonable endeavours to provide those details to the FRO by 5.00 pm on the first *business day* following the day on which the Distributor received those details, or at a time and frequency agreed by the parties, and must identify the details as relating to a customer-own read;

and

…….

2.2.3 Customer provided Meter Readings

If, following the failure by a *Distributor* to read a meter, the *customer* of a *Retailer* provides the *Retailer* with details of a *customer-own read*, the *Retailer* must use its reasonable endeavours to provide those details to the *Distributor* by 5.00 pm on the first *business day* following the day on which it receives those details from the *customer*, or at a time and frequency agreed by the parties.

Qld RMP Proposed Amendments

2.2.3 Provision of Meter Reading Information

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(v) where the *Distributor* has been provided a *Customer-own read* by the *FRO* and the Distributor reasonably considers the Customer-own read to be accurate, the Distributor must use its reasonable endeavours to provide the *FRO* with the following information:

(A) the day on which the *meter* was *read*; and

(B) the *validated meter reading* for that *meter*,

by 5.00 pm on the first *business day* following the day on which the *Customer-own read* was received by the *Distributor* or at a time and frequency agreed by the parties;

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(viii) where details of a *Customer-own read* are provided by the *Customer* in writing to the *Distributor*, the *Distributor* must use its reasonable endeavours to provide those details to the *FRO* by 5.00 pm on the first *business day* following the day on which the *Distributor* received those details or at a time and frequency agreed by the parties and must identify the details as relating to a *Customer-own read*;

and

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2.2.4 Customer provided Meter Readings

If, following the failure by a *Distributor* to *read* a *meter*, the *Customer* of a *User* provides the *User* with details of a *Customer-own read*, the *User* must use its reasonable endeavours to provide those details to the *Distributor* by 5.00 pm on the first *business day* following the day on which it receives those details from the *Customer*, or at a time and frequency agreed by the parties.

NSW/ACT RMP Proposed Amendments

3.1.3 Customer Provided Meter Reading

If, following the failure by a *Network Operator* to *read* a *meter*, 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*, or at a time and frequency agreed by the parties.

(b) to the *Network Operator*, the *Network Operator* must process the Customer-own read in accordance with clauses 3.5 and 3.6.

3.5 Provision of Meter Reading Information

3.5.1 General Meter Readings

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(f) Unless the *Network Operator* has been provided with a *Customer-own read (Actual)* where the *Network Operator* has been provided a *Customer-own read* by the *FRO* or the *Customer,* and the *Network Operator* reasonably considers the *Customer-own read* to be accurate, the *Network Operator* must use its reasonable endeavours to provide the *FRO* with the following information:

(i) the day on which the *meter* was *read*;

(ii) the next *scheduled read date*;

(iii) the *validated meter reading* for that ~~meter~~ *meter*; and

(iv) a flag indicating that the *reading* was a *Customer-own read,*

by 5.00 pm on the next *business day* after the day on which the *Customer-own read* for a *gas meter* was validated by the *Network Operator* or by 5.00 pm on the 5th *business day* after the day on which the *Customer-own read* for a *hot water meter* was received by the *Network Operator*, or at a time and frequency agreed by the parties.

Note: For the purpose of the *Gas Interface Protocol*, Participant Build Pack 5, the *meter reading* under (f) will be assigned the value of "C" for the purpose of the field "Type_of_Read" in the Meter Data Notification (MDN) transactions

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SA Proposed Amendments

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*, or at a time and frequency agreed by the parties.

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

ATTACHMENT 2 - EXAMPLE OF IMPLEMENTATION OF PROPOSED PROCEDURE CHANGE

The obligations regarding delivery of CoRs between retailers and DBs were originally included in the retail gas procedures when a Customer Own Read (CoR) might be delivered as a result of the DB trying to undertake its normal cyclic meter reading activity. For example, in NSW the gas network left a CoR Card when it didn't obtain access to the customer meter.

Under the current obligations the party who receives the CoR must provide it to the other party by 5 pm the next business day. So, if no agreement is struck, then the CoRs will continue to be provided each day.

However, retailers and networks are developing mobile apps which allow customers to read their meters as often as they wish. The result is that a retailer or DB may receive a CoR from a customer daily or weekly.

Experience is showing that when so many CoRs are received, daily provision of the CoRs may create system problems for the other party.

The proposed procedure change would allow the parties bilaterally to limit the number of CoRs to be transacted.

An example might be to only provide the first CoR received each month. So, if a customer is providing more than one CoR per month, the receiving party would record those CoRs but only provide the first one received each month to the other party.

This would allow the customer to continue to deliver CoRs as frequently as they wish. The CoRs would be stored, but only the first one received each month would be sent to the other party.

So, if a customer is only providing one read per quarter, that read would be passed on each quarter. If they delivered one each month, that read would be passed on. CoRs delivered any more frequently would be limited to the frequency agree.

ATTACHMENT 3 – AGL'S ISSUE/COMMENT DURING IN006/17 (AMEND THE SA RMP TO BE MORE ALIGNED WITH EAST COAST JURISDICTIONS) CONSULTATION.

IMPACT & IMPLEMENTATION REPORT (IIR)
ISSUE No: 006/17

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

Ref #1 – SA Retail Market Procedures (RMP)

Ref	Company	RMP Clause #	Issue / Comment	Proposed text ~~Red strikeout~~ means delete and blue underline means insert	AEMO Response (AEMO only)
13	AGL	3.1.4	Customer Own Reads (CoR) There are customers delivering CoRs daily and, in general, the receiving party only needs one CoR a month, not daily CoRs. The suggested amendment would allow this reduction in CoR data delivery to be agreed by the relevant parties whilst still retaining the current obligation as a minimum position. AGL suggest an amendment to the all the procedures for CoR meter data provisions be commenced to remove an unnecessary / potential non-compliance of an obligation imposed on either the network or the retailer – refer to AGL GMI.	2. **3.1.4. Customer-own reads** 3. If, following the failure by a Network Operator to read a meter, 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 or at a time and frequency agreed by the parties. (b) to the Network Operator, the Network Operator must process the Customer-own read in accordance with clauses 3.4 to 3.7 or at a time and frequency agreed by the parties.	AEMO notes AGLs point that there is an existing GMI (IN008/19) to review the wording of Customer Own Reads. The scope of this GMI includes SA. AGL provided the same proposed drafting in the 4th round SA RMP feedback. The response that AEMO provided in the 4th round feedback remains unchanged in that AGLs suggested changes can be considered under GMI IN008/19. It should be noted that the priorities for 2020 have been agreed with the GRCF back in Sept 2019. The GRCF decided not to include IN008/19 in the 2020 program of work, therefore this initiative will don't be reviewed till 2021. If AGL or any other participants feels IN008/19 is a priority, they are welcome to raise the matter with the GRCF and put forward reasons why it needs to be a priority in 2020.