

27 November 2018



Ms Nicola Cusworth
Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

10 Eagle Street
Brisbane QLD 4122
T 07 3347 3100

Dear Ms Cusworth

Approval of amendment to the Retail Market Scheme – Procedure Changes IN002/18W, IN003/18W, IN004/18W and IN005/18W.

Under section 11ZOL of the *Energy Coordination Act 1994* (the “Act”), the members of an approved retail market scheme may prepare an amendment to its Retail Market Scheme (the “Scheme”) and submit the amendment to the Economic Regulation Authority (ERA) for approval.

The framework provided for the ERA to review and approve amendments to the Scheme are provided in section 11ZOM of the Act. The Scheme is defined to include, amongst other things, Australian Energy Market Operator (AEMO), Retail Market Procedures (RMP) Western Australia (WA), AEMO Specification Pack and FRC Hub Operational Terms and Conditions. AEMO as the formal entity for the Scheme is applying to ERA on behalf of the members for four amendments to the Scheme as described in Attachments A-B.

Background

The RMP WA sets out the procedure change process that AEMO must follow before submitting changes to the ERA. AEMO has applied this process which assisted AEMO and relevant stakeholders develop the four amendments proposed in this application. These amendments were finalised by AEMO on behalf of stakeholders when it published the final Impact and Implementation Reports (IIRs) for each amendment on its website on the 12 October 2018.

The consultation that underpins the procedure change process determined that two of the amendments (IN002/18W and IN005/18W) were “Non-material”, whilst the remaining two amendments (IN003/18W and IN004/18W) were determined to be “Non-substantial” in the proposed amendments:

- (i) do not have a material impact on the information technology systems of AEMO, participants, pipeline operators or prescribed persons; or
- (ii) do not materially alter consumer protection mechanisms under the RMP; or
- (iii) do not have a material commercial impact on AEMO, participants, pipeline operators or prescribed persons.

As per clause 384(1) of the RMP WA, it was determined that an ‘Expedited’ process for making *procedures* was applicable for IN002/18W and IN005/18W. As per clause 384(3) of the RMP WA each participant, pipeline operator, prescribed person and interested person was invited to submit written comments to the proposed amendments for IN002/18W and IN005/18W. Submissions closed on 26 October 2018 with no objections received.

As per clause 383(1) of the RMP WA each participant, pipeline operator, prescribed person and interested person was invited to submit written comments to the proposed amendments for

APPLICATION TO ERA RE PROCEDURE CHANGES (IN002-18W IN003-18W IN004-18W AND IN005-18W)

IN003/18W and IN004/18W. Submissions closed on 12 November 2018 with no objections received.

AEMO has decided to submit the four amendments to ERA for approval as endorsed procedure changes. Please refer to Attachments C to F for the four IIRs and Attachment G for the spreadsheet of WA address attributes.

Amendments to the Scheme for ERA consideration

Attachment A contains a summary of each amendment and includes a description on what artefact under the Scheme is changing; the actual change (in “track change” mode); and any additional relevant information that is not covered in the IIR.

Section 11ZOO (1) and (2) of the Act specifies the criteria that the ERA is to consider in determining whether to approve an amendment to the Scheme. AEMO believes the details contained in this application; the final IIRs; and further amendments based on participant feedback to the IIRs as described in Attachment B satisfies the criteria and will enable the ERA to consider the amendments.

In accordance with clause 384(5) of the RMP WA for IN002/18W and IN005/18W and clause 383(4) of the RMP WA for IN003/18W and IN004/18W, AEMO must provide information to stakeholders about how to make submissions to the ERA on endorsed procedure changes, including a closing date for any ERA submissions. Dr Natalie Robins from the ERA has provided AEMO with this information which includes advice that submissions to the ERA will close on **8 January 2019**.

Upon sending this application, AEMO will publish on its website this application and the information about making submissions to the ERA.

Should the ERA approve the four endorsed procedure changes, AEMO proposes to implement the changes related to IN002/18W and IN005/18W to take effect on **25 January 2019**, and the changes related to IN003/18W and IN004/18W to take effect on **29 March 2019**. These dates meet the timing desired by the market and aligns with the targeted implementation date for system changes related to IN003/18W and IN004/18W to take effect. AEMO request that the ERA consider, approve, and publish the approval for these changes in the *Gazette* so that the proposed implementation dates can be met.

If you require any further information or if have any questions in relation to this application, please contact Nandu Datar on 03 9609 8851.

Yours sincerely



Mr Peter Geers
Executive General Manager Markets
Australian Energy Market Operator.

ATTACHMENT A – Summary of Amendments

IN002/18W – Minor Change to Clause 323A

1. This proposed change involves amending clause 323A of RMP WA that places an obligation on the Compliance Panel (CP) to meet annually.
2. The Scheme document that requires the amendment is the RMP WA.

3. Following is an extract from the RMP showing the changes in “track change” mode with ~~red strikeout~~ meaning “delete” and blue underline meaning “insert”

Part 6.2 – Functions and powers of compliance panel

322 Independence of compliance panel

- (1) Except as provided in clause 1(2), the *compliance panel* is independent of direction or control by *AEMO* or any *participant*, *pipeline operator* or *prescribed person* in the performance of its functions.
- (2) *AEMO* may give written directions to the *compliance panel* chairperson to the extent allowed by clause 1(3), and the *compliance panel* chairperson must give effect to any such direction.
- (3) Directions under clause 1(2) —
 - (a) may relate only to general policies to be followed by the *compliance panel* in matters of administration, including financial administration; and
 - (b) cannot constrain the *compliance panel* with respect to the performance of any function referred to in clause (a)a(1)1.323.
- (4) If a direction is given under clause 1(2), then *AEMO* must give a copy of the direction to each *participant*, *pipeline operator* or *prescribed person*, and to any other *interested person* who requests a copy.

323 Functions of the compliance panel

The functions of the *compliance panel* are to hear and make determinations on matters referred to it by *AEMO* or a *participant* regarding:

2. alleged breaches of the *procedures*; or
3. the interpretation of the *procedures*; or
4. any other matter that can be referred to the *compliance panel* under these *procedures*.

323A. ~~Annual Meeting~~

- (1) The *compliance panel* must meet: if *AEMO*, a *scheme participant*, *pipeline operator* or *prescribed person* informs the Chair of the *compliance panel* in writing that they wish to bring a matter before the *compliance panel* for discussion.
 - ~~(a) at least once in each calendar year; and~~
 - ~~(b) more frequently if *AEMO* or a *Scheme participant* informs the Chair of the *compliance panel* in writing that they wish to bring a matter before the *compliance panel* for discussion.~~
- (2) The meetings of the compliance panel are to:
 4. There is no additional information to submit with this application.

IN005/18W – Notification of Error by Previous User

1. The proposed change involves amending clause 32 of the procedures so that the current user is required to follow a formal process in the event a previous user notifies that there may be a transfer error.
2. The Scheme document that requires amendment is the RMP WA.
3. Following is an extract from the RMP showing the changes in “track change” mode with **red strikethrough** meaning “delete” and **blue underline** meaning “insert”

32. Error correction notice

- (1) If a *current user* becomes aware of an error or inaccuracy in an item of the *AEMO standing data* as the result of:
 - (a) lodging an incorrect *transfer request* with *AEMO*, then the *current user* must as soon as practicable and in any event within 10 business days notify the *previous user* of this fact. ~~If the current user does not know the identity of the previous user then:~~
 - (i) There is no clause 32(1)(a)(i)
 - (i) ~~the current user must as soon as practicable and in any event within 10 business days notify AEMO and request AEMO to notify it of the identity of the previous user. The current user's request must include the following details:~~
 - A. ~~the MIRN for the relevant delivery point;~~
 - B. ~~the GBO identification of the person lodging the notice;~~
 - C. ~~the date the transfer request was completed (being the transfer day on which the transfer was purported to have occurred);~~
 - (ii) within one *business day* of receiving a *notice* under clause 32(1)(a)(i) ~~(i)~~ *AEMO* must confirm that:
 - A. the person lodging the notice is the *current user*;
 - B. the *delivery point* exists within the *AEMO Registry*; and
 - C. a *transfer* was completed on the day referred to in the *notice*; and
 - (i) if *AEMO* is able to confirm these matters, *notify* the *current user* of the identity of the *previous user*; or
if *AEMO* is not able to confirm the matters in clause 32(1)(a)(ii), then within one *business day* of receiving a *notice* under clause 32(1)(a) ~~(i)~~ *AEMO* must notify the *current user*.
 - (ii) As soon as practicable after receiving a *notice* under clause 32(1)(a)(ii), the *current user* must *notify* the *previous user* that it has become aware of an error or inaccuracy in an item of *AEMO standing data* as a result of lodging an incorrect *transfer request*;
 - (a) the *network operator* having lodged an incorrect *delivery point transaction* with *AEMO* in respect of *new connection confirmation notice* or *permanent removal confirmation notice* — the *current user* must as soon as practicable and in any event within 10 business days notify the *network operator* of this fact.
 - (b) the previous user notifying the current user of the error or inaccuracy, then the current user must investigate the error or inaccuracy and notify the previous user of the outcome as soon as practicable and in any event within 10 business days.
 - (2) If a *previous user* is notified under clause 32(1)(a) or clause 32(1)(c) it may as soon as practicable and in any event within 10 business days lodge an *error correction notice* for the *delivery point* with *AEMO*.
4. There is no additional information to submit with this application.

IN003/18W – Address Attributes

1. This proposed change involves WA jurisdiction adopting the streamlined process described in section 2.1.2 of the aseXML Standards Working Group (ASWG) Change Management Process document and publishing the WA list of prescribed address attributes on AEMO website.
2. The Scheme documents requiring amendment are the RMP WA and FRC B2B System Interface Definition.
3. Following are extracts from the RMP WA and FRC B2B System Interface Definition showing the changes in “track change” mode with **red strikethrough** meaning “delete” and **blue underline** meaning “insert”

Retail Market Procedures (WA) changes are:

2. Definitions

"address based identifiers" in relation to the address standard specified in the AEMO Specification Pack, the attributes that make up the address based identifiers are street type, street suffix, flat or unit type, floor or level type and postal delivery type.

14 Other instruments

- (1) Each person required to comply with these *procedures*, must also comply with the following documents (as applicable):
 - (a) the *AEMO Specification Pack*, but not the portions of the *AEMO Specification Pack* that apply only in South Australia; and
 - (b) *FRC Hub Operational Terms and Conditions*.
- (2) For the avoidance of doubt, Chapter 9 and the *procedure* change process under these *procedures* do apply to any amendment made to the documents listed in clause 2(1)(a), but not to the document listed in 14(1)(b) or to the portions of the *AEMO Specification Pack* that apply only in South Australia.
- (3) In the event of any inconsistency between the provisions of these *procedures* and either of the documents listed in clause 2(1), the inconsistency is to be resolved by giving precedence to these *procedures* and then each of the other documents shall be read in the order of precedence as listed in clause 2(1).
- (4) AEMO must publish the *AEMO Specification Pack* and the *FRC Hub Operational Terms and Conditions*, as amended from time to time.
- (5) If a User or Network Operator or AEMO becomes aware of an addition to the aseXML Schema enumerated address based identifiers, as soon as practicable after becoming aware of the change the relevant User or Network Operator or AEMO must:
 - (a) Ensure that this new address based identifier is added to the aseXML Schema enumerated address based identifiers using the rapid change process as set out in the ASWG Change Management Process as published on the AEMO website; and
 - (b) Where there has been an update to the aseXML Schema enumerated address based identifiers, provide a notice via the FRC Hub broadcast email distribution list that an addition to the list has been implemented; and
 - (c) Where a User or Network Operator or AEMO has received a notice as set out in clause 14(5)(b), AEMO, all Users and Network Operators must use reasonable endeavours to implement the updated enumerations file within 10 business days but no later than 35 business days.

FRC B2B System Interface Definition changes are:

Appendix A. Data Dictionary

CSV Data Elements

CSV Element Name	Element Name	Description	Attributes /Format	Logical Length/ Decimal Length	Allowed Values
Flat_Or_Unit_Type	Flat Or Unit Type (Address Elements)	Defines the type of flat or unit as per Australian Standard AS4590	String	4	For SA See aseXML data element address For WA "APT", "CTGE", "DUP", "FY", "F", "HSE", "KSK", "MSNT", "MP", "OFF", "PTHS", "RM", "SHED", "SHOP", "SITE", "SL", "STU", "SE", "TNHS", "U", "VLLA", "WARD", "WE"
Floor_Or_Level_Type	Floor Or Level Type (Address Elements)	Defines the floor or level type as per Australian Standard AS4590	String	2	For SA See aseXML data element address For WA "B", "FL", "G", "L", "LG", "M", "UG"
Street_Suffix_1 Street_Suffix_2	Street Suffix (Address Elements)	Defines the street suffix as per Australian Standard AS4590	String	2	For SA See aseXML data element address For WA "CN", "E", "EX", "LR", "N", "NE", "NW", "S", "SE", "SW", "UP", "W" Note: Street_Suffix_2 is not used in WA.
Street_Type_1 Street_Type_2	Street Type (Address Elements)	Defines the street type as per Australian Standard AS4590	String	4	See aseXML data element address. Note: Street_Type_2 is not used in WA.

Appendix A. Data Dictionary

aseXML Data Elements¹

aseXML Element Name	Element Name	Description	Attributes /Format	Length/ Decimal Places	Allowed Values
Address	Address	Supply Point address in aseXML structured format. The allowed values and formats for address elements are contained within the aseXML Schema (in "Enumerations.xsd" and "ClientInformation.xsd").			For WA, details about what address attributes to apply, please refer to the WA list of address attributes spreadsheet published on AEMO website
AdjustmentReasonCode	Adjustment Reason Code	A code that the Network Operator provides to the	String	Enum	"Under Read"

WA List of Address Attributes

The attached spreadsheet is version 1.0 of the WA list of address attributes that will take effect once the RMP changes are approved. The spreadsheet shows comparison between Enumerations V 6.0 and schema R13 currently used by WA LVI. It shows the attributes that need to be added to schema R13.

The WA list of address attributes will be published on AEMO webpage that contains Information pack (SA/WA) documents

- There is no additional information to submit with this application.

IN004/18W – Complete MIRN Listing

- This proposed change involves Implementing the Complete MIRN Listing feature for the WA gas retail market.
- The Scheme documents requiring amendment are the RMP WA and FRC B2B System Interface Definition.
- Following are extracts from the RMP WA and FRC B2B System Interface Definition showing the changes in “track change” mode with ~~red-strikeout~~ meaning “delete” and blue underline meaning “insert”

Retail Market Procedures (WA) changes are:

74A ~~There is no clause 74A~~ Complete MIRN Listing

- (a) Each network operator must use its best endeavours to update, format and deliver a new complete MIRN listing in accordance with the AEMO Specification Pack which is to be made available to AEMO by 5pm on the fifth business day after the end of the calendar month or as otherwise agreed from time to time by all relevant parties.
- (b) AEMO must make each complete MIRN listing available to all users after it is received from the network operator.
- (c) The user must ensure that the complete MIRN listing is accessed and used solely to confirm the relevant discovery address/MIRN details of the customer.
- (d) The user must ensure that the customer has provided explicit informed consent to access and use the complete MIRN listing to confirm the relevant discovery address/MIRN details of the customer in relation to the delivery point.

FRC B2B System Interface Definition changes are:

Appendix E Non Automated Electronic Files

Overview

The following sections specify the format of those B2B 'electronic file' transactions (not aseXML) which use CSV components. The CSV component will be incorporated into a file, compressed and then communicated via an e-mail or on a disk.

The CSV file name shall be constructed as described in the CSV File Format Specification Document. If the CSV file is attached to an e-mail, the subject line must be constructed as defined in CSV File Format Specification Document. The transaction name must be taken from the table below.

This document covers CSV details for the following transactions.

Transaction number	Transaction Type Description	CSV File Name / e-Mail Subject Component Name
45	Energy History Request	ENERGYHISTORYREQUEST
45A	Bulk Basic-Metered Energy History Request	BULKBASICHISTORYREQUEST
46	Energy History Response	ENERGYHISTORYRESPONSE
	Interval Meter Energy History Response	INTERVALHISTORYRESPONSE
71	Amend Customer Details	AMENDCUSTOMERDETAILS
74	Annual Meter Reading Schedule	METERREADINGSCHEDULE
75	Meter Reading Route Change	READINGROUTECHANGE
136	Time Expired Meters Notification	TIMEEXPIREDMETERS
289	Standing Data Change From DB	STANDINGDATACHANGE
298	Refresh of New Street Listing for MIRN Discovery	NEWSTREETLISTING
<u>299</u>	<u>Complete MIRN Listing</u>	<u>distributor_ccyymmddhhmiss.zip</u>
330	Notification of Planned Outage	SERVICERENEWAL

333	Meter Range Updates	METERRANGEUPDATE
	Interval Meter Data	INTERVALMETERDATA

Complete MIRN Listing (T299) (For WA)

The Network Operator must make available to Users a listing of all distribution metering supply points that have a MIRN assigned and a MIRN status of either Registered (up stand installed), Commissioned (meter installed) or Decommissioned (meter removed). The Network Operator must ensure that all data fields as per Transaction 299 that are available in their database are transferred to the Complete MIRN Listing.

The Network Operator must ensure that the Complete MIRN Listing file is encrypted and compressed (see section 4.4 for allowable compression formats) in a way that when the User retrieves the file it can be decrypted and uncompressed using the "WinZip" utility.

The Network Operator will utilise the CSV fields and formats consistent with the fields and formats that are used in the aseXML schema applicable for a MIRN Discovery Response which is defined in FRC B2B Systems Interface Definitions, section 4.3.2.3 (NMIDiscoveryResponse).

The Complete MIRN Listing is to be refreshed after the end of the calendar month by the Network Operator and the Network Operator must FTP the refreshed files to their existing designated folder on GRMS. AEMO will transfer the Complete MIRN Listing to the existing designated folder for each User on GRMS.

The following file naming convention is to be used:

distributor ccyymmddhhmiss.zip

Note: Reference to "Network Operator" and "User" refer to the Hub participant ID.

<u>Transaction 299</u>		
<u>Heading/Column designator</u>	<u>Mandatory/Optional</u>	<u>Comment</u>
<u>MIRN</u>	<u>M</u>	<u>Must be present</u>
<u>MIRNChecksum</u>	<u>M</u>	<u>Must be present</u>
<u>FlatOrUnitType</u>	<u>O</u>	
<u>FlatOrUnitNumber</u>	<u>O</u>	
<u>FloorOrLevelType</u>	<u>O</u>	
<u>FloorOrLevelNumber</u>	<u>O</u>	
<u>BuildingOrPropertyName1</u>	<u>O</u>	
<u>BuildingOrPropertyName2</u>	<u>O</u>	
<u>LocationDescriptor</u>	<u>O</u>	
<u>HouseNumber1</u>	<u>O</u>	
<u>HouseNumber2</u>	<u>O</u>	
<u>HouseNumberSuffix1</u>	<u>O</u>	
<u>HouseNumberSuffix2</u>	<u>O</u>	
<u>LotNumber</u>	<u>O</u>	
<u>StreetName1</u>	<u>O</u>	
<u>StreetName2</u>	<u>O</u>	
<u>StreetType1</u>	<u>O</u>	
<u>StreetType2</u>	<u>O</u>	
<u>StreetSuffix1</u>	<u>O</u>	

StreetSuffix2	0	
PostalDeliveryType	0	
PostalDeliveryNumberPrefix	0	
PostalDeliveryNumberValue	0	
PostalDeliveryNumberSuffix	0	
SiteAddressCity	0	
SiteAddressState	0	
SiteAddressPostcode	0	
SiteAddressDPID	0	
GasMeterNumber	0	
Address1	0	
Address2	0	
Address3	0	

[Refer Appendix A Data Dictionary – CSV Data Elements for the description of the address elements from the table above](#)

[Password exchange process](#)

[The Complete MIRN Listing password exchange process is as follows:](#)

- [User to nominate an email address to send password. These details are sent to Network Operators;](#)
- [Password to change each 90 days; and](#)
- [Network Operators to email password details to user prior to it being used.](#)

4. There is no additional information to submit with this application.

ATTACHMENT B – SUBMISSIONS RECEIVED FOR CHANGE

SUBMISSION relating to the IIR IN002/18W – Minor Change to Clause 323A

General Comments on the IIR

Sections 1 to 4 of the IIR sets out AEMOs critical examination of the proposal. Does your organisation support AEMO's examination of the proposal?

	Date	Participant	Issue / Comment		AEMO Comment
1	10 Oct 2018	AGL	<p>In the context of the requirement of the Compliance Panel to meet annually, this assessment is valid.</p> <p>However, as a general comment, there is currently some debate and uncertainty about compliance obligations with respect to the WA Retail Gas Market, in particular the obligation to report a breach of the procedures under s325 of the Retail Market Procedures (RMP). AGL recommends that a broader review of the compliance process under Chapter 6 of the RMP be undertaken by AEMO, including the requirement of submitting compliance breach reports to AEMO.</p>		AEMO acknowledges AGL's support and notes the recommendation for broader review of the compliance process.
2	25 Oct 2018	Origin Energy	Origin Energy support this proposal.		AEMO acknowledges Origin Energy's support
3	10 Oct 2018	Alinta	Alinta Energy supports the proposed rule change IN002/18W to require the Compliance Panel to meet only when		AEMO acknowledges Alinta Energy's support

APPLICATION TO ERA RE PROCEDURE CHANGES (IN002-18W IN003-18W IN004-18W AND IN005-18W)

SUBMISSION relating to the IIR IN002/18W – Minor Change to Clause 323A					
			requested by AEMO or a scheme participant.		
Sections 5 to 10 of the IIR sets out AEMO’s assessment of likely effect of proposal. Does your organisation support AEMO’s assessment of likely effect of proposal.?					
#	Date	Participant	Issue / Comment		AEMO Comment
4	10 Oct 2018	AGL	As above. AGL supports the assessment but considers that the broader compliance process needs consideration.		AEMO acknowledges AGL’s support and notes the recommendation for broader review of the compliance process.
5	25 Oct 2018	Origin Energy	Origin Energy support this proposal.		AEMO acknowledges Origin Energy’s support
Section 11 of the IIR set out AEMOs recommendation. Does your organisation support AEMO position to recommend the procedures changes?					
#	Date	Participant	Issue / Comment		AEMO Comment
6	10 Oct 2018	AGL	As above AGL supports the change but recommends that a broader view of compliance management be considered.		AEMO acknowledges AGL’s support and notes the recommendation for broader review of the compliance process.
7	25 Oct 2018	Origin Energy	Origin Energy support this proposal.		AEMO acknowledges Origin Energy’s support
Specific comments regarding RMPs and GIP/SP					
#	Date	Participant	Issue / Comment	Proposed Text	AEMO Comment
8	10 Oct 2018	AGL	The Compliance Panel can only be called by AEMO and scheme participants. However, the compliance panel covers compliance with the WA retail Market Procedures, which ‘govern the interactions between participants, pipeline operators, prescribed persons and AEMO in the Western Australian gas retail market’ (WA Retail Procedures , p17).	Modify 323A to: If AEMO, a scheme participant, pipeline operator or prescribed person informs	AEMO has made the change proposed by AGL since it adds further clarity.

SUBMISSION relating to the IIR IN002/18W – Minor Change to Clause 323A

			<p>AGL notes that pipeline operators and prescribed persons are not included in the list of parties who can request the compliance panel to meet. Therefore, AGL suggests they be included in the list.</p>		
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SUBMISSION relating to the IIR IN005/18W – Notification of Error by Previous User

General Comments on the IIR

Sections 1 to 4 of the IIR sets out AEMOs critical examination of the proposal. Does your organisation support AEMO’s examination of the proposal?

	Date	Participant	Issue / Comment		AEMO Comment
1	25 Oct 2018	Origin Energy	Origin Energy support this proposal. General comment. Current informal process is a handshake between retailers to minimize impacts however timeliness is an issue. Agree with the 10 business days however it would be beneficial to have the work flow mapped out so each participant understands the process.		AEMO acknowledges Origin Energy’s support and notes the general comment.
2	10 Oct 2018	Alinta	Alinta Energy supports the proposed rule change IN005/18W which will require a current user to investigate an error or inaccuracy, if notified by a previous user, within 10 business days.		AEMO acknowledges Alinta Energy’s support

Sections 5 to 10 of the IIR sets out AEMO’s assessment of likely effect of proposal. Does your organisation support AEMO’s assessment of likely effect of proposal.?

	Date	Participant	Issue / Comment		AEMO Comment
3	25 Oct 2018	Origin Energy	Origin Energy support this proposal.		AEMO acknowledges Origin Energy’s support

Section 11 of the IIR set out AEMOs recommendation. Does your organisation support AEMO position to recommend the procedures changes?

	Date	Participant	Issue / Comment		AEMO Comment
4	25 Oct 2018	Origin Energy	Origin Energy support this proposal.		AEMO acknowledges Origin Energy’s support

Specific comments regarding RMPs and GIP/SP

#	Date	Participant	Issue / Comment	Proposed Text	AEMO Comment
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SUBMISSION relating to the IIR IN005/18W – Notification of Error by Previous User

5	25 Oct 2018	Origin Energy	<p>RMP Clause 32. (1)(a) Error Correction Notice</p> <p>The Current User can determine Previous User on a Customer Win “pending” transaction. Current User would not be the initiating majority due to Previous User most likely receiving customer contact when final bills are sent.</p>	<p>(a) lodging an incorrect <i>transfer request</i> with AEMO, then the <i>current user</i> must as soon as practicable <u>and in any event within 10 business days</u> notify the <i>previous user</i> of this fact. If the current user does not know the identity of the previous user then:</p> <p>(i) the current user must as soon as practicable and in any event within 10 business days notify AEMO and request AEMO to notify it of the identity of the previous user. The current user’s request must include the following details:</p> <p>A. the MIRN for the relevant delivery point;</p> <p>B. the GBO identification of the person lodging the notice;</p> <p>C. the date the transfer request was completed (being the transfer day on which the transfer was purported to have occurred).</p>	<p>AEMO has made the change proposed by Origin Energy since it adds further clarity.</p>
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SUBMISSION relating to the IIR IN003/18W – Address Attributes**General Comments on the IIR****Sections 1 to 4 of the IIR sets out AEMOs critical examination of the proposal. Does your organisation support AEMO's examination of the proposal?**

	Date	Participant	Issue / Comment		AEMO Comment
1	25 Oct 2018	AGL	AGL supports the concept of a fast track ASWG process but does not believe that AEMO has adequately examined the comments made by AGL in the PPC and considered the obligations the proposed drafting was placing on users.		AEMO acknowledges AGL's support and regarding additional comment, advises that AEMO does not support AGL's proposed change in view of keeping the wording of the new subclause 14(5) consistent with other jurisdictions. AEMO has since held discussion with AGL to explain the need to consider a holistic view of the issue raised by AGL. This issue will be added to the future program of work for all jurisdictions. AGL noted that the process used in other jurisdictions works and is supportive of holistic review. On that basis AGL agree not to go forward with the revised wording put forward in their IIR response.
2	9 Nov 2018	Origin Energy	Origin Energy's preferred option is option 1 as this creates a uniform position across all jurisdictions. As such Origin Energy are in support of the		AEMO acknowledges Origin Energy's support and wishes to advise that option 4 which includes

SUBMISSION relating to the IIR IN003/18W – Address Attributes					
			rapid change process described in the ASWG Change Management Process Guide.		option 1 and the need to satisfy obligations of statutory authority Landgate.
Sections 5 to 10 of the IIR sets out AEMO’s assessment of likely effect of proposal. Does your organisation support AEMO’s assessment of likely effect of proposal.?					
	Date	Participant	Issue / Comment		AEMO Comment
3	25 Oct 2018	AGL	<p>AGL does not agree with some outcomes of AEMO’s assessment. AGL supports the implementation of the fast track process to provide updates to the address enumeration list but rejects the current drafting to achieve this goal. AGL notes that while this drafting is used in other markets, it does not support the drafting as it stands, as it places an obligation on AGL as a User, which AGL cannot meet.</p> <p>The current market process is for a participant to identify the need for a new enumeration, raise a change request to the ASWG to discuss and agree that enumeration and for the ASWG to publish the update and advise the market of an update to the enumeration list.</p> <p>AGL provided feedback in the PPC that the drafting placed obligations on ‘User or Network Operator or AEMO’ to amend the enumeration and advise the market of that amendment, which is not the correct process.</p> <p>A legal review of the drafting by AGL considers that the obligations rest on AGL as a user if AGL identify a new</p>		<p>AEMO acknowledges AGL’s support and regarding additional comment, advises that AEMO does not support AGL’s proposed change in view of keeping the wording of the new subclause 14(5) consistent with other jurisdictions. AEMO has since held discussion with AGL to explain the need to consider a holistic view of the issue raised by AGL. This issue will be added to the future program of work for all jurisdictions. AGL noted that the process used in other jurisdictions works and is supportive of holistic review. On that basis AGL agree not to go forward with the revised wording put forward in their IIR response.</p>

SUBMISSION relating to the IIR IN003/18W – Address Attributes

			<p>address not listed in the current schema, then AGL must as soon as <u>practicable</u>:</p> <ol style="list-style-type: none"> 1. Add it to the schema using the rapid change process; and 2. Notify through the FRC broadcast hub to the distribution list. <p>The obligation then rests of the distribution list to implement the change to ensure the address in question can be supplied with gas.</p> <p>In the PPC AGL provided amendments to the drafting which met the intended outcome of PPC (ie to use the ASWG to fast track changes as required) but clarified each parties obligations within that process and aligned it to the process as is.</p> <p>AGL strongly suggests AEMO review the drafting prior to the final decision.</p>		
4	9 Nov 2018	Origin Energy	Origin Energy supports AEMO’s assessment of likely effect of proposal.		AEMO acknowledges Origin Energy’s support
<p>Section 11 of the IIR set out AEMOs recommendation. Does your organisation support AEMO position to recommend the procedures changes?</p>					
	Date	Participant	Issue / Comment		AEMO Comment
5	25 Oct 2018	AGL	<p>AGL supports the need to make the necessary changes to ensure that new enumerations are processed quickly to the market.</p> <p>However, AGL does not believe that the drafting is appropriate as it places incorrect and untenable obligations on</p>		<p>AEMO acknowledges AGL’s support and regarding additional comment, advises that AEMO does not support AGL’s proposed change in view of keeping the wording of the new</p>

SUBMISSION relating to the IIR IN003/18W – Address Attributes					
			AGL and other parties which they are unable to meet.		subclause 14(5) consistent with other jurisdictions. AEMO has since held discussion with AGL to explain the need to consider a holistic view of the issue raised by AGL. This issue will be added to the future program of work for all jurisdictions. AGL noted that the process used in other jurisdictions works and is supportive of holistic review. On that basis AGL agree not to go forward with the revised wording put forward in their IIR response.
6	9 Nov 2018	Origin Energy	Origin Energy supports AEMO position to recommend the procedures changes		AEMO acknowledges Origin Energy's support
Specific comments regarding RMPs and GIP/SP					
#	Date	Participant	Issue / Comment	Proposed Text	AEMO Comment
7	9 Nov 2018	Origin Energy	RMP Clause 14(5)(a) When the User, Network Operator or AEMO become aware of an addition to the aseXML Schema enumerated address based identifiers they should advise the ASWG chair. The ASWG through their working group will then make the decision.	(a) Ensure that this new address based identifier is added to the ASWG is advised of an addition to the aseXML Schema enumerated address based identifiers <u>for inclusion in the rapid change process as set out in the ASWG Change Management Process as published on the AEMO website: and</u>	AEMO does not support Origin Energy's proposed change in view of keeping the wording of the new subclause 14(5) consistent with other jurisdictions. AEMO advises the need to consider a holistic view of the issue raised by Origin Energy. This issue will be added to the future program of work for all jurisdictions.

SUBMISSION relating to the IIR IN003/18W – Address Attributes					
8	25 Oct 2018	AGL	RMP Clause 14(5) Grammar / Context AGL believes that the trigger is a need to add an enumeration.	(5) If a User or Network Operator or AEMO becomes aware of an addition needed to the aseXML Schema enumerated address based identifiers, as soon as practicable after becoming aware of the change the relevant User or Network Operator or AEMO must:	AEMO acknowledges AGL's support and regarding additional comment, advises that AEMO does not support AGL's proposed change in view of keeping the wording of the new subclause 14(5) consistent with other jurisdictions. AEMO has since held discussion with AGL to explain the need to consider a holistic view of the issue raised by AGL. This issue will be added to the future program of work for all jurisdictions. AGL noted that the process used in other jurisdictions works and is supportive of holistic review. On that basis AGL agree not to go forward with the revised wording put forward in their IIR response.
9	25 Oct 2018	AGL	RMP Clause 14(5)(a) AGL believes that the obligation is not for the identifying participant to add the enumeration, but rather to advise to the ASWG to investigate and add the enumeration if warranted using the rapid change process.	ensure that this new address based identifier is advised to the ASWG for inclusion through added to the aseXML Schema enumerated address based identifiers using the rapid change process as set out in the ASWG Change Management Process as published on the AEMO website: and	AEMO acknowledges AGL's support and regarding additional comment, advises that AEMO does not support AGL's proposed change in view of keeping the wording of the new subclause 14(5) consistent

SUBMISSION relating to the IIR IN003/18W – Address Attributes

					with other jurisdictions. AEMO has since held discussion with AGL to explain the need to consider a holistic view of the issue raised by AGL. This issue will be added to the future program of work for all jurisdictions. AGL noted that the process used in other jurisdictions works and is supportive of holistic review. On that basis AGL agree not to go forward with the revised wording put forward in their IIR response.
10	25 Oct 2018	AGL	<p>RMP clause 14(5)(b)</p> <p>AGL Notes that while there is an obligation to publish a notice of change for the schema enumerated list, its not clear in the rules that there is an obligation to publish the enumerated list on the AEMO website (in these Retail Rules).</p>	<p>(b) where there has been an update to the aseXML Schema enumerated address based identifiers.</p> <p>(i) Publish the amended enumeration list on its website; and</p> <p>(ii) provide a notice via the FRC Hub broadcast email distribution list that an addition to the list has been implemented together with its web address.</p>	<p>AEMO acknowledges AGL’s support and regarding additional comment, advises that AEMO does not support AGL’s proposed change in view of keeping the wording of the new subclause 14(5) consistent with other jurisdictions. AEMO has since held discussion with AGL to explain the need to consider a holistic view of the issue raised by AGL. This issue will be added to the future program of work for all jurisdictions. AGL</p>

SUBMISSION relating to the IIR IN003/18W – Address Attributes

					noted that the process used in other jurisdictions works and is supportive of holistic review. On that basis AGL agree not to go forward with the revised wording put forward in their IIR response.
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SUBMISSION relating to the IIR IN004/18W – Complete MIRN Listing

General Comments on the IIR

Sections 1 to 4 of the IIR sets out AEMOs critical examination of the proposal. Does your organisation support AEMO’s examination of the proposal?

	Date	Participant	Issue / Comment		AEMO Comment
1	5 Nov 2018	Origin Energy	Origin Energy support AEMO’s critical examination of the proposal.		AEMO acknowledges Origin Energy’s support
2	25 Oct 2018	AGL	AGL supports AEMOs review of the proposal.		AEMO acknowledges AGL’s support

Sections 5 to 10 of the IIR sets out AEMO’s assessment of likely effect of proposal. Does your organisation support AEMO’s assessment of likely effect of proposal.?

	Date	Participant	Issue / Comment		AEMO Comment
3	5 Nov 2018	Origin Energy	Origin Energy support AEMO’s assessment of likely effect of proposal.		AEMO acknowledges Origin Energy’s support
4	25 Oct 2018	AGL	AGL supports AEMOs review of the proposal.		AEMO acknowledges AGL’s support

Section 11 of the IIR set out AEMOs recommendation. Does your organisation support AEMO position to recommend the procedures changes?

	Date	Participant	Issue / Comment		AEMO Comment
5	5 Nov 2018	Origin Energy	Origin Energy support AEMO’s recommendation.		AEMO acknowledges Origin Energy’s support
6	25 Oct 2018	AGL	AGL supports AEMOs review of the proposal.		AEMO acknowledges AGL’s support

Specific comments regarding RMPs and GIP/SP

#	Date	Participant	Issue / Comment	Proposed Text		AEMO Comment
7	5 Nov 2018	Origin Energy	Attachment B The fields mentioned in Attachment B – File Specification for Complete MIRN Listing outlines that the only fields that are ‘Mandatory’ are the MIRN and MIRN Checksum. When retail frontline staff use the MIRN listing they also require additional	Heading/Column designator	Mandatory/O ptional	AEMO does not support Origin Energy’s proposed change and wishes to advise that the suggested value of ‘R’ is not allowed. The values can only be ‘M’ or ‘O’. AEMO has already addressed this request by amending the description
				MIRN	M	
				MIRNChecksum	M	
				FlatOrUnitType	O -R	
				FlatOrUnitNumber	O -R	

SUBMISSION relating to the IIR IN004/18W – Complete MIRN Listing

information re: site address details. As such we request the remaining fields be changed from 'Optional' to 'Required' so if the information is available it is provided.

FloorOrLevelType	O <u>R</u>
FloorOrLevelNumber	O <u>R</u>
BuildingOrPropertyName1	O <u>R</u>
BuildingOrPropertyName2	O <u>R</u>
LocationDescriptor	O <u>R</u>
HouseNumber1	O <u>R</u>
HouseNumber2	O <u>R</u>
HouseNumberSuffix1	O <u>R</u>
HouseNumberSuffix2	O <u>R</u>
LotNumber	O <u>R</u>
StreetName1	O <u>R</u>
StreetName2	O <u>R</u>
StreetType1	O <u>R</u>
StreetType2	O <u>R</u>
StreetSuffix1	O <u>R</u>
StreetSuffix2	O <u>R</u>
PostalDeliveryType	O <u>R</u>
PostalDeliveryNumberPrefix	O <u>R</u>
PostalDeliveryNumberValue	O <u>R</u>
PostalDeliveryNumberSuffix	O <u>R</u>
SiteAddressCity	O <u>R</u>

for transaction 'Complete MIRN Listing (T299)' under Appendix E of FRC B2B System Interface Description

SUBMISSION relating to the IIR IN004/18W – Complete MIRN Listing

				<table border="1"> <tr> <td>SiteAddressState</td> <td>O-R</td> </tr> <tr> <td>SiteAddressPostcode</td> <td>O-R</td> </tr> <tr> <td>SiteAddressDPID</td> <td>O-R</td> </tr> <tr> <td>GasMeterNumber</td> <td>O-R</td> </tr> <tr> <td>Address1</td> <td>O-R</td> </tr> <tr> <td>Address2</td> <td>O-R</td> </tr> <tr> <td>Address3</td> <td>O-R</td> </tr> </table>	SiteAddressState	O -R	SiteAddressPostcode	O -R	SiteAddressDPID	O -R	GasMeterNumber	O -R	Address1	O -R	Address2	O -R	Address3	O -R	
SiteAddressState	O -R																		
SiteAddressPostcode	O -R																		
SiteAddressDPID	O -R																		
GasMeterNumber	O -R																		
Address1	O -R																		
Address2	O -R																		
Address3	O -R																		
8	25 Oct 2018	AGL	In respect to the completeness of the data AGL notes the amendment by AEMO but suggests the wording could be clearer	The Network Operator must ensure that all data fields as per Transaction 299 that are available in their database are transferred to the Complete MIRN Listing irrespective of whether the data field is designated as O (optional) in the table for T299.	AEMO acknowledges AGL’s proposed change and advises that the description has been amended to reflect the request from this change														
9	25 Oct 2018	AGL	Minor edits	<ul style="list-style-type: none"> 2nd para - The Network Operator must ensure that the Complete MIRN Listing file.... 3rd para, 2nd line : MIRN Discovery Response which is defined 	AEMO has made the change proposed by AGL since it adds further clarity.														