

**IMPACT & IMPLEMENTATION REPORT – SUMMARY SECTION**  
*(For AEMO to complete and administer)*

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|---|---|--|-----------------|
| <b>Issue Number</b>   | IN001/18  |  |                 |
| <b>Impacted Jurisdiction (s)</b>  | New South Wales/Australian Capital Territory (NSW/ACT), Victoria (VIC) and Queensland (QLD)   |  |                 |
| <b>Proponent</b>  | Emille Kueh and Nandu Datar   | <b>Company</b>   | Jemena and AEMO |
| <b>Affected Gas Markets(s)</b><br><ul style="list-style-type: none"> <li>▪ Retail</li> <li>▪ Wholesale</li> <li>▪ Bulletin Board</li> <li>▪ STTM</li> </ul> | Retail Gas  | <b>Consultation process (Ordinary or Expedited)</b>              | Ordinary        |
| <b>Industry Consultative forum(s) used</b>  | GRCF  | <b>Date Industry Consultative forum(s)consultation concluded</b> | 22 June 2018    |
| <b>Short Description of change(s)</b>   | Retail Market Procedure (RMP) changes to resolve the issue of confidentiality breach when meter data is provided to the previous retailer following a transfer. |  |                 |
| <b>Procedure(s) or Documentation impacted</b>   | Refer to documents listed in section 2 of this Impact and Implementation Report (IIR).  |  |                 |
| <b>Summary of the change(s)</b>   | See section 1 of this IIR for further detail on these changes.  |  |                 |
| <b>I&amp;IR Prepared By</b>   | Nandu Datar   | <b>Approved By</b>   | Michelle Norris |
| <b>Date I&amp;IR published</b>  | 20 July 2018  | <b>Date Consultation under 135EE or 135EF concludes</b>          | 17 August 2018  |
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## IMPACT & IMPLEMENTATION REPORT – DETAILED REPORT SECTION

### CRITICAL EXAMINATION OF PROPOSAL

1. Description of change(s) and reasons for change(s)

In early January 2018 Jemena submitted a Gas Market Issue (GMI) that proposed both Retail Market Procedure (RMP) and IT systems changes that proposed to alter the timing pertaining to the customer transfer process. The driver for Jemena raising this GMI were concerns relating to potential confidentiality breach by the Network Operator under the National Gas Rules (NGR) (part 16, rule 137) when meter data is provided to the previous retailer following completion of a customer transfer.

#### Issue description as described in the original GMI

If a customer transfer request is submitted 5 business days or less from the transfer effective date (proposed transfer date in the CATS notification transaction), the COM notification is delivered to Jemena after midnight of the 5<sup>th</sup> business day.

Where a notification is received after close of business (COB) of the day before a weekend or public holiday, Jemena may not have staff available to respond to the COM notifications. For interval meters the meter reads continue to be sent to the previous retailer until Jemena takes action on the transfer notification on the next business day.

Where a request is submitted with more than 5 business days from the transfer effective date, the COM notification is delivered to Jemena by 6 AM on the transfer effective date. If the transfer effective date is a weekend or a public holiday, Jemena will action the transfer notification on the first business day following the weekend or public holiday. Meter reads will continue to be delivered to the previous retailer during this intervening period.

#### Potential discrepancy between AEMO systems and RMP NSW/ACT

As per the NSW/ACT RMP, AEMO is required to register the transfer after the expiration of the *data provision period* which is on the midnight of 11<sup>th</sup> day from the transfer effective date or proposed transfer date (the day after the end of the *allowable period*).

If a valid meter reading for the transfer has already been received, the system currently registers the transfer immediately after the objection period (5 business days) is over and sends the registration notification, which sometimes can be after COB of the day before a weekend or public holiday. AEMO's system does not wait until the *data provision period* has expired to process the registration, as indicated by clause 6.7.1.

#### Jemena's original proposed solution

Jemena's original proposal suggested that the current prescribed timings for when transfer and objection notices need to be lodged should be modified. Changes of this nature would affect AEMO's delivery of CATS transactions to a number of market participants. In addition, the Network Operator objection timeframe would also

be impacted, giving them less time to object and withdraw objections.

#### AEMO review of Jemena's proposal

In late April 2018 AEMO undertook a detailed review of the proposal which included a legal and IT system impact assessment. At the conclusion of this assessment, AEMO noted that:

- Jemena's proposal would require significant AEMO system changes in addition to system changes that would be required by Jemena and retailers; and
- This issue as described also exists in Victoria and Queensland jurisdictions<sup>1</sup>.

Having completed its assessment, AEMO formed a view that no confidentiality breach can arise where meter reading data is provided to the FRO that is currently registered for a delivery point / supply point / distribution supply point, even if the data is provided after the effective date of a customer transfer.

AEMO acknowledges there may be some risk in respect of data sent in the period between the Network Operator / Distributor receiving notice of change of registration and acting to change the FRO in the Network Operator/Distributor's systems.

Given the nature of the risk was considered to be immaterial by AEMO, it was determined that the most effective way forward was to provide further clarity to the transfer timing provision within RMPs. It was determined that this approach would adequately address the Jemena issue and that IT system changes would not be required.

#### AEMO's Proposed Solution

AEMO proposes to amend:

- The clause related to registration of customer transfer to address the identified discrepancy where the AEMO system does not wait for the expiry of the data provision period. Instead AEMO proposes to make a change that registers the customer transfer once all requirements are fulfilled (see **Attachments A to C** for further details); and
- The clause related to provision of energy data to clarify that the Network Operator / Distributor must cease sending meter reading data to the previous FRO (for periods after the transfer date) once it receives the registration notification, or on the next business day if notification is received after close of business on a business day (see **Attachments A to C** for further details).

The above proposal was tabled with Jemena in early May 2018. Jemena subsequently agreed with AEMO's proposed solution as described in Attachment A to C.

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<sup>1</sup> The issue doesn't impact South Australia because the timing provisions ensure there is no confidentiality breach

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| <p>2. Reference documentation</p> <ul style="list-style-type: none"> <li>▪ Procedure Reference</li> <li>▪ GIP/Specification Pack Reference</li> <li>▪ Other Reference</li> </ul>  | <p>Retail Market Procedures (NSW/ACT) – V18</p> <p>Retail Market Procedures (VIC) – V13</p> <p>Retail Market Procedures (QLD) – V14</p>   |
| <p>3. The high level details of the change(s) to the existing Procedures</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>▪ A comparison of the existing operation of the Procedures to the proposed change to the operation of the Procedures</li> <li>▪ A marked up version of the Procedure change (see Attachment A)</li> </ul> | <p>Amend RMP NSW/ACT to:</p> <ul style="list-style-type: none"> <li>• Modify the paragraph after clause 6.7.1 (d) to exclude the condition for expiration of the data provision period and inclusion of meeting all applicable conditions;</li> <li>• Add sub-clause (d) to clause 3.6.5 that requires the Network Operator to act on the registration of a customer transfer immediately on the next business day; and</li> <li>• Amend the cross reference in clause 6.2.1 (c)(iii) from (a) to (b).</li> </ul> <p>Amend RMP VIC and RMP QLD to:</p> <ul style="list-style-type: none"> <li>• Modify the paragraph after clause 4.6.1 (f) to exclude the condition for expiration of the data provision period and inclusion of meeting all applicable conditions; and</li> <li>• Add subclause (e) to clause 2.6.2 that requires the Distributor to act on the registration of a customer transfer immediately on the next business day.</li> </ul> <p>See Attachments A to C for further details.</p> |
| <p>4. Explanation regarding the order of magnitude of the change</p> <p>(eg: material, non-material or non-substantial)</p>   | <p>This initiative will require minor RMP changes in NSW/ACT, VIC and QLD. It is a documentation change only.</p> <p>There are no impacts on gas retail market participants.</p> <p>AEMO considers the order of magnitude of this change as ‘non-material’.</p>   |

### ASSESSMENT OF LIKELY EFFECT OF PROPOSAL

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| <p>5. Overall Industry Cost / benefit (tangible / intangible / risk) analysis and/or cost estimates</p> | <p>Section 9 of this IIR describes the consultation steps undertaken by AEMO prior to issuing this IIR. During the Proposed Procedure Change (PPC) consultation period, no participant raised any concerns in relation to the cost impacts to industry or the benefits identified. AEMO has therefore concluded that there are no significant costs for gas retail market participants to implement the proposed changes. The benefits identified for this change should be realised immediately.</p> |
| <p>6. The likely implementation effect of the change(s) on stakeholders</p>                             | <p>Implementation of this initiative will not require any changes to the either systems or processes for gas retail market participants.</p>  |

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| (e.g. Industry or end-users)   |  |
| 7. Testing requirements  | Not applicable   |
| <p>8. AEMO’s preliminary assessment of the proposal’s compliance with section 135EB:</p> <ul style="list-style-type: none"> <li>- consistency with NGL and NGR,</li> <li>- regard to national gas objective</li> <li>- regard to any applicable access arrangements</li> </ul> | <p><u>Consistency with NGL and NGR:</u></p> <p>AEMO’s view is that the proposed RMP changes are consistent with the NGL and cover matters that the RMP may deal with under Section 135EA(1) of the NGR.</p> <p><u>National Gas Objective</u></p> <p><i>“Promote efficient investment in, and efficient operation and use of, natural gas services for the long term interests of consumers of natural gas with respect to price, quality, safety, reliability and security of supply of natural gas.”</i></p> <p>It is AEMO’s view that the proposed changes described in this IIR will assist the efficient operation of the retail gas market, and are in the long-term interests of consumers as it promotes retail competition.</p> <p><u>Applicable Access Arrangements</u></p> <p>AEMO’s view is that the proposed changes in this IIR are not in conflict with existing Access Arrangements. The Distributor did not raise concerns with the proposed amendments in relation to their Access Arrangement.</p> |
| <p>9. Consultation Forum Outcomes</p> <p>(e.g. the conclusions made on the change(s) whether there was unanimous approval, any dissenting views)</p>   | <p>On 8 June 2018 AEMO published on its website a PPC that recommended minor documentation changes as described in <b>Attachments A, B and C</b>. Registered participants and interested stakeholders were invited to make submissions which closed on 22 June 2018.</p> <p>AEMO received submissions from Jemena, APA/AGN, AGL, Origin Energy, and Red/Lumo. The submissions raised a small number of issues regarding AEMO’s proposed solution. AEMO has since resolved all issues raised in participant submissions. In addition, AEMO has included a small number of minor amendments that provide further clarity within the procedures.</p> <p>AEMO has also included changes related to a minor cross reference issue in clause 6.2.1 of the NSW/ACT RMP raised by AGL.</p>   |

| <b>RECOMMENDATION(S)</b>  |  |
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| 10. Should the proposed Procedures be made, (with or without amendments)?   | <b>AEMO recommends</b> that the changes to the RMPs be made as proposed in Attachment A, B and C with amendments as per the consultation outcomes (refer to Item 9 above).   |
| 11. If applicable, a proposed effective date for the proposed change(s) to take effect and justification for that timeline. | <p>Subject to all necessary approvals AEMO is targeting to implement this initiative on 28 September 2018.</p> <p>To achieve this implementation date, AEMO proposes the following timeline:</p> <ul style="list-style-type: none"> <li>• Issue IIR on 20 July 2018;</li> <li>• Submissions on IIR close 17 August 2018;</li> <li>• AEMO decision on 29 August 2018; and</li> <li>• Effective date 28 September 2018.</li> </ul> |

**ATTACHMENT A**  
**Proposed changes: Retail Market Procedures – NSW/ACT**  
~~Red strikeout~~ means delete and  
blue underline means insert

### 6.7.1 Registration

Where:

- (a) a *User* has delivered to *AEMO* a *transfer request* in relation to a *delivery point* which complies with clause 6.2.1; and
- (b) the *Network Operator* for the *delivery point* to which the *transfer request* relates:
  - (i) has not delivered an *objection notice* in accordance with clause 6.4.1; or
  - (ii) has delivered such an *objection notice* but subsequently delivered to *AEMO* an *objection withdrawal notice* in accordance with clause 6.4.2; and
- (c) the *Network Operator* has delivered the relevant information referred to in clause 3.5.2 to *AEMO* prior to the expiry of the *data provision period*; and
- (d) the *User* who delivered the *transfer request* to *AEMO* remains a *User*, and has not delivered a *transfer withdrawal notice* pursuant to clause 6.6.1,

*AEMO* must, as soon as is practicable ~~after the expiration of the data provision period~~, register that *User* in the *AEMO metering database* as the *FRO* for the *delivery point* to which the *transfer request* relates.

### 3.6.5 Provision of Energy Data to FRO

- (a) Subject to clause 3.1.7(c) and clause 4.1 in relation to the period within which such information must be provided, a *Network Operator* must use its reasonable endeavours to provide to the *FRO* for the *delivery point* to which a *meter* relates (unless the *reference reading* was obtained from a *special read* of the *meter* requested by a person other than the *FRO* for that *delivery point*):
  - (i) the *MIRN* for the *delivery point*;
  - (ii) the *meter type* (*gas meter* or *hot water meter*);
  - (iii) the *meter number* for the *meter*;
  - (iv) the *flow* used to calculate the *consumed energy*, together with:
    - (A) the *reference reading* and the *base reading* used to calculate the *flow* (identified as being *actual meter readings*, *estimated meter readings* or *substituted meter readings* as the case may be); and
    - (B) the dates on which those *meter readings* were obtained or made;
  - (v) the *pressure correction factor*, the *common factor* (if applicable) and the *average heating value* used to calculate the *consumed energy*; and



(vi) the *consumed energy*,

by the applicable time below:

(A) where the *meter reading* was a *validated meter reading* by the *Network Operator*, 5.00 pm on the next *business day* after the day on which a *gas meter* was read or 5.00 pm on the 4th *business day* after the day on which a *hot water meter* was read; or

(B) where the *meter reading* was a *validated meter reading* provided by the *FRO* to the *Network Operator*, 5.00 pm on the next *business day* after the day on which the *FRO* provided a *gas meter reading*, or 5.00 pm on the 4th *business day* after the *FRO* provided a *hot water meter reading*; or

(C) where the *Network Operator* has been unable to obtain a *validated meter reading* in accordance with a *scheduled read date*, 5.00 pm on the 2<sup>nd</sup> *business day* after that *scheduled read date* for a *gas meter* or 5:00 pm on the 5<sup>th</sup> *business day* after that *scheduled read date* for a *hot water meter*; or

(D) where the *meter reading* was an *estimated meter reading* or a *substituted meter reading*, 5.00 pm on the 2<sup>nd</sup> *business day* after the *scheduled read date* for a *gas meter* or 5.00 pm on the 5<sup>th</sup> *business day* after that *scheduled read date* for a *hot water meter*.

(b) Where *AEMO* delivers a *registration notice* in respect of a *delivery point* under clause **Error! Reference source not found.** or clause 11.7 to the relevant *Network Operator*, that *Network Operator* must use its reasonable endeavours to:

(i) provide to the *User* that has been registered as the *FRO* for the *delivery point* the information referred to in paragraph (a) (excluding *base reading*, *flow*, *consumed energy* and the *average heating value* used to calculate the *consumed energy*) in respect of the *validated meter reading* referred to in 3.5.2, which *validated meter reading* is the *reference reading* for the purposes of this clause 3.6.5 (whether that *reading* was obtained from a *special read* of the *meter* or as a result of a *read* conducted on a *scheduled read date*); and

(ii) in relation to a *registration notice* under clause 6.8 only, provide to the person who was the *FRO* for that *delivery point* immediately prior to the registration of the new *FRO* the information referred to in paragraph (a) in respect of the *validated meter reading* referred to in clause 3.5.2(b), which *validated meter reading* is the *reference reading* for the purposes of this clause 3.6.5 (where that *reading* was obtained from a *special read* of the *meter*),

by 5.00 pm on the next *business day* after the day on which the *Network Operator* receives the *registration notice*.

(c) Where the *Network Operator* has provided any of the information referred to in paragraphs (a) or (b) to the *FRO* for a *delivery point* pursuant to clause 3.5, the *Network Operator* will have satisfied the relevant obligation under this clause 3.6.5 by providing the corresponding information under clause 3.5.

(d) Where *AEMO* delivers a *registration notice* in respect of a *delivery point* under clause 6.8 or clause 11.7 to the relevant *Network Operator*, the previously registered *FRO* will cease to be entitled to receive energy data under clause 3.6.5(a) in respect of any period after the effective date of the relevant registration from the later of:



- i. the end of the *business day* on which the *registration notice* was received by the *Network Operator*, and
- ii. if the *registration notice* was received after 5.00 pm on a *business day*, 9.00 am on the next *business day*.

## 6.2 Initiation of Transfer

### 6.2.1 Transfer Request

- (a) A *prospective FRO* for any *delivery point* that:
  - (i) has an existing *metering installation* in place; and
  - (ii) is currently assigned in the *AEMO metering database* to another *FRO*,  
must deliver a *transfer request* to *AEMO* in accordance with this clause 6.2.
- (b) A *transfer request* must specify a *proposed transfer date* that falls within the *permitted prospective period* for that *transfer request*.
- (c) A *transfer request* must include the following information in respect of the *delivery point* to which that *transfer request* relates:
  - (i) the *MIRN*;
  - (ii) the *network receipt point*;
  - (iii) the *proposed transfer date* (see paragraph (a**b**)); and
  - (iv) if applicable, a statement that the current *Customer* at the *delivery point* intends to purchase *gas* at that *delivery point* from the *prospective FRO* following registration of that *User* in the *AEMO metering database* as the *FRO* for that *delivery point* (a *Customer no-change statement*).
- (d) A *transfer request* must also contain the name of the *prospective FRO* who delivered the *transfer request* to *AEMO*.

**ATTACHMENT B – DOCUMENTATION CHANGES (SEE SECTION 3)**  
**Proposed changes: Retail Market Procedures – VIC**  
Blue represents additions Red and strikeout represents deletions – Marked up changes

#### 4.6.1 Registration

Where:

- (a) a *Market Participant* has delivered to AEMO a *transfer request* in relation to a *supply point* which complies with clause 4.1.1;
- (b) the *proposed transfer date* nominated in the *transfer request* is a *prospective transfer date* which complies with clause 4.1.2(a);
- (c) the *FRO* for the *supply point* to which the *transfer request* relates:
  - (i) has not delivered to AEMO, by midnight on the fifth *business day* after the day on which AEMO delivered to it the *transfer request notification* in relation to the *transfer request*, an *objection notice* in relation to the *transfer request* pursuant to clause 4.3.1; or
  - (ii) has delivered such an *objection notice* but has subsequently delivered to AEMO an *objection withdrawal notice* in relation to the *transfer request* pursuant to clause 4.3.2; and
- (d) if the *supply point* to which the *transfer request* relates is a *distribution supply point* and the *meter* which relates to that *supply point* is a *basic meter*, the following information has been delivered to AEMO, prior to the expiration of the *data provision period*, by the *Distributor* in whose *distribution area* the *supply point* is located:
  - (i) the day to which a *validated meter reading* (other than an *estimated meter reading*) referred to in clause 2.1.5(b) pertains, such day being within the *allowable period*, and closest to, or on the *proposed transfer date*, and
  - (ii) the information referred to in clause 2.6.2(b) in relation to that *validated meter reading* (which *validated meter reading* is the *reference reading* for the purposes of clause 2.6.2),

then, unless the *Market Participant* who delivered the *transfer request* to AEMO:

- (e) is no longer a *Market Participant*; or
- (f) has delivered to AEMO a *transfer withdrawal notice* in relation to the *transfer request* pursuant to clause 4.5.1,

AEMO must ~~at expiration of the data provision period~~, as soon as is practicable, register that *Market Participant* in the AEMO *metering register* as the *FRO* for the *supply point* to which that *transfer request* relates.

## 2.6.2 Provision of Energy Data

- (a) Except as otherwise provided in clause 2.9 in relation to the period within which such information must be provided, a *Distributor* must use its reasonable endeavours to provide to the *FRO* for the *distribution supply point* to which a *meter* relates (unless the *reference reading* was obtained from a *special read* of the *meter* requested by a person other than the *FRO* for that *distribution supply point*):
- (i) the *MIRN* for the *distribution supply point*;
  - (ii) the *meter number* for the *meter*;
  - (iii) the *flow* used to calculate the *consumed energy*, together with:
    - (A) the *reference reading* and the *base reading* used to calculate the *flow* (identified as being *actual meter readings*, *estimated meter readings* or *substituted meter readings* as the case may be); and
    - (B) the dates on which those *meter readings* were obtained or made;
  - (iv) the *pressure correction factor* and the *average heating value* used to calculate the *consumed energy*; and
  - (v) the *consumed energy*,
- by
- (1) 5.00pm on the first *business day* after the day on which the *meter* was read where the *meter reading* was a *validated meter reading*; or
  - (2) by 5:00 pm on the first *business day* after the day on which a *meter read* was provided by the *FRO* where the *meter reading* was a *validated meter reading*, or
  - (3) where the *Distributor* has been unable to obtain a *validated meter reading* in accordance with a *meter reading schedule*, by 5:00 pm on the second *business day* after the *scheduled read date*; or
  - (4) where the *meter reading* was an *estimated meter reading* or a *substituted meter reading* by 5:00pm on the second *business day* after the *scheduled read date*.
- (b) Except as otherwise provided in clause 2.9 in relation to the period within which such information must be provided, a *Distributor* must also use its reasonable endeavours to provide to AEMO in relation to each *distribution supply point* which is a *second tier supply point*:
- (i) the *MIRN* for the *distribution supply point*;
  - (ii) the *consumed energy*;

- (iii) the dates on which the *reference reading* and *base reading* for the *consumed energy* were obtained or made; and
- (iv) information as to whether the readings used to calculate the *flow* are *actual meter readings*, *estimated meter readings* or *substituted meter readings*,

by

- (1) midnight on the first *business day* after the day on which the *meter* was read where the *meter reading* was a *validated meter reading*; or
  - (2) by midnight on the first *business day* after the day on which a *meter read* was provided by the *FRO* where the *meter reading* was a *validated meter reading*, or
  - (3) where the *Distributor* has been unable to obtain a *validated meter reading* in accordance with a *meter reading schedule*, by midnight on the second *business day* after the *scheduled read date*; or
  - (4) where the *meter reading* was an *estimated meter reading* or a *substituted meter reading* by midnight on the second *business day* after the *scheduled read date*.
- (c) Where, pursuant to clause 4.8, AEMO delivers a *registration notice* in respect of a *distribution supply point* to the *Distributor* in whose *distribution area* that *distribution supply point* is located, that *Distributor* must use its reasonable endeavours to:
- (i) provide to the *Market Participant* that has been registered as the *FRO* for the *distribution supply point* the information referred to in clause 2.6.2(a) (excluding *base reading*, *flow*, *consumed energy* and *the average heating value* used to calculate the *consumed energy*) in respect of the *validated meter reading* referred to in clause 2.1.5(b)(i), 2.1.5(b)(ia), 2.1.5(b)(ib) or 2.1.5(b)(ii), which *validated meter reading* is the *reference reading* for the purposes of this clause 2.6.2 (whether that reading was obtained from a *special read* of the *meter* or as a result of a read conducted in accordance with a *meter reading schedule*); and
  - (ii) where the *proposed transfer date* nominated in the *transfer request* is a *prospective transfer date*, provide to the person who was the *FRO* for that *distribution supply point* immediately prior to the registration of the new *FRO* for that *distribution supply point* the information referred to in clause 2.6.2(a) in respect of the *validated meter reading* referred to in clause 2.1.5(b)(i), 2.1.5(b)(ia) or 2.1.5(b)(ib), which *validated meter reading* is the *reference reading* for the purposes of this clause 2.6.2 (where that reading was obtained from a *special read* of the *meter*),

by 5.00 pm on the first *business day* following the day on which the *Distributor* receives the *registration notice*.

- (d) Where, pursuant to clause 2.1.5, the *Distributor* has provided:
- (i) to the *FRO* for a *distribution supply point* any of the information referred to in clause 2.6.2(a); or
  - (ii) to AEMO any of the information referred to in clause 2.6.2(b),  
the *Distributor* will have satisfied its obligations under clause 2.6.2(a) or 2.6.2(b) (as applicable) with respect to the information provided under clause 2.1.5.

(e) Where AEMO delivers a registration notice in respect of a supply point under clause 4.8 to the relevant Distributor, the previously registered FRO will cease to be entitled to receive energy data under clause 2.6.2(a) in respect of any period after the effective date of the relevant registration from the later of:

- i. the end of the business day on which the registration notice was received by the Distributor, and
- ii. if the registration notice was received after 5.00 pm on a business day, 9.00 am on the next business day.

**ATTACHMENT C – DOCUMENTATION CHANGES (SEE SECTION 3)**  
**Proposed changes: Retail Market Procedures – QLD**  
Blue represents additions **Red** and **strikeout** represents deletions – Marked up changes

#### 4.6.1 Registration

Where:

- (a) a *User* has delivered to *AEMO* a *transfer request* in relation to a *distribution supply point* which complies with clause 4.1.1;
- (b) the *proposed transfer date* nominated in the *transfer request* is a *prospective transfer date* which complies with clause 4.1.2(a);
- (c) the *FRO* for the *distribution supply point* to which the *transfer request* relates:
  - (i) has not delivered to *AEMO*, by midnight on the fifth *business day* after the day on which *AEMO* delivered to it the *transfer request notification* in relation to the *transfer request*, an *objection notice* in relation to the *transfer request* pursuant to clause 4.3.1; or
  - (ii) has delivered such an *objection notice* but has subsequently delivered to *AEMO* an *objection withdrawal notice* in relation to the *transfer request* pursuant to clause 4.3.2; and
- (d) the following information has been delivered to *AEMO*, prior to the expiration of the *data provision period*, by the *Distributor* in whose *distribution region* the *distribution supply point* is located:
  - (i) the day to which a *validated meter reading* (other than an *estimated meter reading*) referred to in clause 2.2.3(b) pertains, such day being within the *allowable period*, and closest to, or on the *proposed transfer date*; and
  - (ii) the information referred to in clause 2.6.2(b) in relation to that *validated meter reading* (which *validated meter reading* is the *reference reading* for the purposes of clause 2.6.2),

then, unless the *User* who delivered the *transfer request* to *AEMO*:

- (e) is no longer a *User*; or
- (f) has delivered to *AEMO* a *transfer withdrawal notice* in relation to the *transfer request* pursuant to clause 4.5.1,

*AEMO* must ~~at expiration of the data provision period~~, as soon as is practicable, register that *User* in the *AEMO metering register* as the *FRO* for the *distribution supply point* to which that *transfer request* relates.

#### 2.6.2 Provision of Energy Data

- (a) Except as otherwise provided in clause 2.9 in relation to the period within which such information must be provided, a *Distributor* must use its reasonable endeavours to provide to the *FRO* for the *distribution supply point* to which a *meter* relates (unless the *reference reading* was obtained from a *special read* of the *meter* requested by a person other than the *FRO* for that *distribution supply point*):
  - (i) the *MIRN* for the *distribution supply point*;

- (ii) the *meter number* for the *meter*;
  - (iii) the *flow* used to calculate the *consumed energy*, together with:
    - (A) the *reference reading* and the *base reading* used to calculate the *flow* (identified as being *actual meter readings*, *estimated meter readings* or *substituted meter readings* as the case may be); and
    - (B) the dates on which those *meter readings* were obtained or made;
  - (iv) the *pressure correction factor* and the *average heating value* used to calculate the *consumed energy*; and
  - (v) the *consumed energy*,
- by
- (1) 5.00 pm on the first *business day* after the day on which the *meter* was read where the *meter reading* was a *validated meter reading*; or
  - (2) 5:00 pm on the first *business day* after the day on which a *meter read* was provided by the *FRO* where the *meter reading* was a *validated meter reading*, or
  - (3) where the *Distributor* has been unable to obtain a *validated meter reading* in accordance with a *meter reading schedule*, 5:00 pm on the second *business day* after the *scheduled read date*; or
  - (4) where the *meter reading* was an *estimated meter reading* or a *substituted meter reading*, 5:00 pm on the second *business day* after the *scheduled read date*.
- (b) Except as otherwise provided in clause 2.9 in relation to the period within which such information must be provided, a *Distributor* must also use its reasonable endeavours to provide to AEMO in relation to each *distribution supply point* which is a *second tier supply point*:
- (i) the *MIRN* for the *distribution supply point*;
  - (ii) the *consumed energy*;
  - (iii) the dates on which the *reference reading* and *base reading* for the *consumed energy* were obtained or made; and
  - (iv) information as to whether the readings used to calculate the *flow* are *actual meter readings*, *estimated meter readings* or *substituted meter readings*,
- by
- (1) midnight on the first *business day* after the day on which the *meter* was read where the *meter reading* was a *validated meter reading*; or
  - (2) midnight on the first *business day* after the day on which a *meter read* was provided by the *FRO* where the *meter reading* was a *validated meter reading*, or
  - (3) where the *Distributor* has been unable to obtain a *validated meter reading* in accordance with a *meter reading schedule*, midnight on the second *business day* after the *scheduled read date*; or
  - (4) where the *meter reading* was an *estimated meter reading* or a *substituted meter reading*, midnight on the second *business day* after the *scheduled read date*.
- (c) Where, pursuant to clause 4.8, AEMO delivers a *registration notice* in respect of a *distribution supply point* to the *Distributor* in whose *distribution region* that *distribution supply point* is located, that *Distributor* must use its reasonable endeavours to:
- (i) provide to the *User* that has been registered as the *FRO* for the *distribution supply point* the information referred to in clause 2.6.2(a) (excluding *base reading*, *flow*, *consumed energy* and the *average heating value* used to calculate the *consumed*



energy) in respect of the *validated meter reading* referred to in clause 2.2.3(b), which *validated meter reading* is the *reference reading* for the purposes of this clause 2.6.2 (whether that reading was obtained from a *special read* of the meter or as a result of a read conducted in accordance with a *meter reading schedule*); and

- (ii) where the *proposed transfer date* nominated in the *transfer request* is a *prospective transfer date*, provide to the person who was the *FRO* for that *distribution supply point* immediately prior to the registration of the new *FRO* for that *distribution supply point* the information referred to in clause 2.6.2(a) in respect of the *validated meter reading* referred to in clause 2.2.3(b)(i), which *validated meter reading* is the *reference reading* for the purposes of this clause 2.6.2 (where that reading was obtained from a *special read* of the meter),

by 5.00 pm on the first *business day* following the day on which the *Distributor* receives the *registration notice*.

- (d) Where, pursuant to clause 2.2.3, the *Distributor* has provided:

- (i) to the *FRO* for a *distribution supply point* any of the information referred to in clause 2.6.2(a); or
- (ii) to *AEMO* any of the information referred to in clause 2.6.2(b),

the *Distributor* will have satisfied its obligations under clause 2.6.2(a) or 2.6.2(b) (as applicable) with respect to the information provided under clause 2.2.3.

(e) Where AEMO delivers a *registration notice* in respect of a *distribution supply point* under clause 4.8 to the relevant *Distributor*, the previously registered *FRO* will cease to be entitled to receive energy data under clause 2.6.2(a) in respect of any period after the effective date of the relevant registration from the later of:

- i. the end of the *business day* on which the *registration notice* was received by the *Distributor*, and
- ii. if the *registration notice* was received after 5.00 pm on a *business day*, 9.00 am on the next *business day*.

## ATTACHMENT D – Consolidated List of Stakeholder Feedback to Proposed Procedure Change

| STAKEHOLDER | CLAUSE/SECTION REF.     | ISSUE/COMMENT   | PROPOSED TEXT<br><del>RED STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT | AEMO RESPONSE   |
|-------------|-------------------------|---|--|---|
| Jemena      | NSW/ACT Clause 1.7.1    | Should be 6.7.1   |  | AEMO acknowledges Jemena’s comment and advises that the typo has been corrected.  |
| Jemena      | NSW/ACT Clause 3.6.5(d) | Jemena does not believe that this clause will absolve Jemena’s obligation to the NGR. Jemena would like AEMO to consider instead of delivering the registration notification by 5pm on a business day, to deliver the notification by noon on a business day. This would allow the distributor time to register the notification and ensure that the incorrect data is not delivered to the outgoing FRO. |  | <p>AEMO acknowledged Jemena’s comment and following further analysis effort by both AEMO and Jemena, the proposed wording of the new clause 3.6.5(d) was amended as follows,</p> <p>Clause 3.6.5(d) states,</p> <p><u>(d) Where AEMO delivers a registration notice in respect of a delivery point under clause 6.8 or clause 11.7 to the relevant Network Operator, the previously registered FRO will cease to be entitled to receive energy data under clause 3.6.5(a) in respect of any period after the effective date of the relevant registration from the later of:</u></p> |

| STAKEHOLDER | CLAUSE/SECTION REF. | ISSUE/COMMENT  | PROPOSED TEXT<br><del>RED-STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT | AEMO RESPONSE   |
|-------------|---------------------|--|--|---|
|             |                     |  |  | <ul style="list-style-type: none"> <li>i. <u>the end of the business day on which the registration notice was received by the Network Operator, and</u></li> <li>ii. <u>if the registration notice was received after 5.00 pm on a business day, 9.00 am on the next business day.</u></li> </ul> |
| AGL         |                     | <p>General comments</p> <p>The drafting does not change the issue that Jemena sought to rectify.</p> <p>If the network raises an objection, which is subsequently withdrawn, the transfer should complete for the requested date with the requested reading.</p> <p>Depending on the data provision cycle, more data would be delivered to the FRO</p> |  | <p>AEMO acknowledges AGL's comment and advises that the compliance issue applies when data is sent to the previous FRO after AEMO has registered the transfer.</p>  |

| STAKEHOLDER | CLAUSE/SECTION REF. | ISSUE/COMMENT   | PROPOSED TEXT<br><del>RED STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT | AEMO RESPONSE  |
|-------------|---------------------|---|--|--|
|             |                     | <p>who is registered for that site, prior to the transfer being enabled for a past date.</p> <p>In summary, we don't believe that the proposed changes address the issue the GMI sought to resolve, and may in fact create other unintended consequences.</p>   |  |  |
| AGL         | 3.6.5(d)            | <p>General Comment</p> <p>The addition of this clause should be unnecessary and is potentially like to cause mismatches between existing obligations for the provision of data.</p> <p>Its not clear within the current drafting how the clause (d) operates in respect to the provision of energy data for the period the retailer was the FRO for a site – e.g. update from CoR to actual meter read. E.g. Cl 3.3 in particular, should require the network to adjust</p> |  | <p>AEMO acknowledges AGL's comment and advises the following, Clause 3.6.5(d) states,</p> <p><u>(d) Where AEMO delivers a registration notice in respect of a delivery point under clause 6.8 or clause 11.7 to the relevant Network Operator, the previously registered FRO will cease to be entitled to receive energy data under clause 3.6.5(a) in respect of any period after the effective date of the relevant registration from the later of:</u></p> <ul style="list-style-type: none"> <li><u>i. the end of the business day on which the</u></li> </ul> |

| STAKEHOLDER | CLAUSE/SECTION REF. | ISSUE/COMMENT   | PROPOSED TEXT<br><del>RED-STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT | AEMO RESPONSE   |
|-------------|---------------------|---|--|---|
|             |                     | <p>data with both the current and previous FRO.<br/>It is also unclear how relevant meter data would be provided if there was a mismatch of timing between receipt of the registration notice and provision by the network of valid data to the FRO for a valid period.<br/>There are various other clauses which specify the obligations of data provision from the network to FRO, and include the provision of updated and historical data – e.g. Ch 3, so it is unclear if this clause provides clarity or in fact, creates subsequent issues.<br/>AGL recommends deleting this clause.</p> |  | <p><u>registration notice was received by the Network Operator, and</u></p> <p>ii. <u>if the registration notice was received after 5.00 pm on a business day, 9.00 am on the next business day.</u></p> <p>It only relates to data provision under clause 3.6.5(a). Clause 3.6.5(b) relates to providing data related to error correction request and clause 3.6.5(d) does not apply to it.</p> <p>AEMO included this clause only to cover potential confidentiality issue where the transfer has been registered and data continues to be sent to the previous FRO.</p> |
| AGL         | 6.7.1               | Drafting has an incorrect clause number (1.7.1 not 6.7.1) and errored cross references within the text  |  | AEMO acknowledges AGL’s proposed change and advises that this will be rectified in the IIR.   |

| STAKEHOLDER | CLAUSE/SECTION REF. | ISSUE/COMMENT  | PROPOSED TEXT<br><del>RED STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT  | AEMO RESPONSE   |
|-------------|---------------------|--|---|---|
| AGL         | 6.7.1               | <p>Removal of the 'data provision period' from clause 6.7.1 has a number of impacts.</p> <ol style="list-style-type: none"> <li>1. It removes the concept of the 'allowable period' which establishes the period in which a meter read is valid for a transfer.<br/><br/>Under the current drafting a customer could potentially be transferred with a meter reading from any period – eg -20 to +20 days</li> <li>2. CI 6.7.2 – The obligations and timings to issue a 'read failure' statement still exists –</li> <li>3. CI 6.7.3 - What timing is now set for 'an alternative transfer date' ?</li> <li>4. CI 6.7.4 – Does the transfer cancellation timing still exist</li> </ol> | <p>As the precondition for registering a transfer occur within the preceding elements of clause 6.7.1. the final paragraph can be simplified to:</p> <p><i>AEMO must, as soon as is practicable, <del>after the expiration of the data provision period</del> register that User in the AEMO metering database as the FRO for the <i>delivery point</i> to which the <i>transfer request</i> relates.</i></p> <p>This drafting would require the transfer to be registered for the applicable date when all conditions are met.</p> <p>AGL notes that if there is an objections, which is subsequently withdrawn, then AGL would expect the transfer to be registered for the originally scheduled date, which would be a past date, and within</p> | <p>AEMO acknowledges AGL's proposed change and advises the following.</p> <p>The PPC also covered the issue of '<u>Potential discrepancy between AEMO systems and RMP NSW/ACT</u>'. The removal of data provision period from 6.7.1 is to align the RMP with AEMO systems only in relation to registering the transfer. There is no change to providing data.</p> <p>You have requested removal of the addition of text '<u>all applicable conditions under this clause have been met</u>'. This text was added to provide further clarity but AEMO has accepted your suggestion to simplify the paragraph.</p> <p>All conditions under clauses 6.7.2, 6.7.3 and 6.7.4 still exist.</p> <p>In relation to objections, the compliance issue exists when data is sent to the previous FRO after AEMO has registered the transfer.</p> |

| STAKEHOLDER | CLAUSE/SECTION REF. | ISSUE/COMMENT   | PROPOSED TEXT<br><del>RED STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT | AEMO RESPONSE   |
|-------------|---------------------|---|--|---|
| AGL         | 6.2.1               | <p>Note clause 6.2.1(c) (iii) refers to clause 6.2.1 (a), however, cl 6.2.1(a) does not reference a transfer date</p> <p><b>6.2.1</b><br/>(c) A <i>transfer request</i> must include the following information in respect of the <i>delivery point</i> to which that <i>transfer request</i> relates:</p> <ul style="list-style-type: none"> <li>(i) the <i>MIRN</i>;</li> <li>(ii) the <i>network receipt point</i>;</li> <li><u>(iii) the <i>proposed transfer date</i> (see paragraph (a))</u>; and</li> <li>(iv) if applicable, a statement that the current <i>Customer</i> at the <i>delivery point</i> intends to purchase <i>gas</i> at that <i>delivery point</i> from the <i>prospective FRO</i> following registration of that <i>User</i> in the <i>AEMO metering database</i> as the <i>FRO</i> for that <i>delivery point</i> (a <i>Customer no-change statement</i>).</li> </ul> | that period, data may have been provided to the original FRO.                                    | AEMO acknowledges AGL's comment and advises that the reference 'see paragraph (a)' has been changed to 'see paragraph (b)' and included in this consultation. |



| STAKEHOLDER   | CLAUSE/SECTION REF.        | ISSUE/COMMENT  | PROPOSED TEXT<br><del>RED-STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT | AEMO RESPONSE  |
|---------------|----------------------------|--|--|--|
|               |                            | <p>(a) A prospective FRO for any delivery point that:</p> <p>(i) has an existing <i>metering installation</i> in place; and</p> <p>(ii) is currently assigned in the <i>AEMO metering database</i> to another FRO, must deliver a <i>transfer request</i> to AEMO in accordance with this clause 6.2.</p>  |  |  |
| Origin Energy | NSW – new clause 3.6.5 (d) | This new clause has been inserted to address a compliance matter where meter data is delivered to an outgoing Retailer. The wording of this specifies, “that Distributor must cease providing energy data to the previously registered FRO under clause 2.6.2(a) immediately after receipt of the registration notice”. It’s ambiguous how the proposed wording change addresses the compliance matter where meter |  | <p>AEMO acknowledges Origin Energy’s comment and advises the following</p> <p>Clause 3.6.5(d) states,</p> <p>(e) <u>Where AEMO delivers a registration notice in respect of a delivery point under clause 6.8 or clause 11.7 to the relevant Network Operator, the previously registered FRO will cease to be entitled to receive energy data under clause 3.6.5(a) in respect of any period after the effective</u></p> |

| STAKEHOLDER   | CLAUSE/SECTION REF.               | ISSUE/COMMENT  | PROPOSED TEXT<br><del>RED-STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT | AEMO RESPONSE   |
|---------------|-----------------------------------|--|--|---|
| Origin Energy | VIC and QLD – new clause 2.6.2(e) | data is processed and delivered after the completion of the transfer and prevents data that may legitimately need to be sent after the registration to the outgoing FRO. Ie. Revised data. |  | <p><u>date of the relevant registration from the later of:</u></p> <ul style="list-style-type: none"> <li><u>i. the end of the business day on which the registration notice was received by the Network Operator, and</u></li> <li><u>ii. if the registration notice was received after 5.00 pm on a business day, 9.00 am on the next business day.</u></li> </ul> <p>It only relates to data provision under clause 3.6.5(a). Clause 3.6.5(b) relates to providing data related to error correction request and clause 3.6.5(d) does not apply to it.</p> <p>AEMO included this clause only to cover potential confidentiality issue where the transfer has been registered and data continues to be sent to the previous FRO.</p> <p>As above</p> |

| STAKEHOLDER | CLAUSE/SECTION REF.  | ISSUE/COMMENT  | PROPOSED TEXT<br><del>RED STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT  | AEMO RESPONSE   |
|-------------|----------------------|--|---|---|
| Red/Lumo    | NSW/ACT Clause 3.6.5 | <p>We do not believe there should be any references to business timings, as this is not consistent with other RMP clauses. It would be prudent to align the timing of any We believe this should be in line with the reference to Gas day timings only.</p> <p>We also question the impact this may have on transfers.</p> | <p>d) Where AEMO delivers a registration notice in respect of a delivery point under clause 6.8 or clause 11.7 to the relevant Network Operator, that Network Operator must cease providing energy data to the previously registered FRO under clause 3.6.5(a) immediately after receipt of the registration notice or, <del>if the registration notice was received after 5.00 pm on a business day, from 9.00 am on the next business day.</del> <u>by the following gas day.</u></p> | <p>AEMO does not support Red/Lumo's proposal.</p> <p>AEMO included this clause only to cover potential confidentiality issue where the transfer has been registered and the network operator received the notice after the end of business day before a weekend or public holidays. In this situation the data may continue to be sent to the previous FRO. Hence the need for including the timeframe.</p> <p>Red/Lumo's suggestion to remove the timeframe and include the text '<u>by the following gas day</u>' may also mean that the network operator can process the transfer by the following gas day even when the notice was received during a business day and could be processed.</p> |
| Red/Lumo    | VIC Clause 2.6.2     | <p>We do not believe there should be any references to business timings, this is not inline with in other RMP clauses where</p>  | <p>e) Where AEMO delivers a registration notice in respect of a supply point under clause 4.8 to the relevant Distributor, that</p>   | <p>As above</p>   |

| STAKEHOLDER | CLAUSE/SECTION REF. | ISSUE/COMMENT  | PROPOSED TEXT<br><del>RED STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT   | AEMO RESPONSE |
|-------------|---------------------|--|--|---------------|
|             |                     | timing is used. We believe this should be in line with the reference to gas day timings only.  | Distributor must cease providing energy data to the previously registered FRO under clause 2.6.2(a) immediately after receipt of the registration notice or, <del>if the registration notice was received after 5.00 pm on a business day, from 9.00 am on the next business day.</del> <u>by the following gas day.</u>   |               |
| Red/Lumo    | QLD Clause 2.6.2    | We do not believe there should be any references to business timings, this is not inline with in other RMP clauses where timing is used. We believe this should be in line with the reference to gas day timings only. | e) Where AEMO delivers a registration notice in respect of a distribution supply point under clause 4.8 to the relevant Distributor, that Distributor must cease providing energy data to the previously registered FRO under clause 2.6.2(a) immediately after receipt of the registration notice or, <del>if the registration notice was received after 5.00 pm on a business day, from 9.00 am on the next business day.</del> <u>by the following gas day.</u> | As above      |

| STAKEHOLDER | CLAUSE/SECTION REF. | ISSUE/COMMENT   | PROPOSED TEXT<br><del>RED STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT | AEMO RESPONSE   |
|-------------|---------------------|---|--|---|
| Red/Lumo    | General Comment     | <p>Red and Lumo make the following additional comments regarding the general nature of the issue that has led to this change:</p> <ol style="list-style-type: none"> <li><u>We question the nature of this issue being labelled as a market issue requiring retail market procedure change</u></li> </ol> <p>Jemena’s initial GMI and PPC both state the description of issue is around receiving completion of transfer notifications outside business hours due to their systems and/or process limitations requiring Jemena staff to manually action these the following business day. This is clearly not a market issue and therefore do not believe that retail market procedures should be amended based on the limitations of a participants systems or processes. We are also awaiting the completion of</p> |  | <p>AEMO acknowledges Red/Lumo’s comment about a participant’s systems or processes.</p> <p>The original proposal required significant system changes by the industry. AEMO identified that by adding further clarity to the relevant clauses of the RMP is sufficient to resolve the issue.</p> |

| STAKEHOLDER | CLAUSE/SECTION REF. | ISSUE/COMMENT  | PROPOSED TEXT<br><span style="color: red;">RED-STRIKEOUT</span> MEANS DELETE AND<br><span style="color: blue; text-decoration: underline;">BLUE UNDERLINE</span> MEANS INSERT | AEMO RESPONSE   |
|-------------|---------------------|--|---|---|
| Red/Lumo    | General Comment     | <p>an action from the GRCF on 20 February, where Jemena agreed to provide advice they have received from any audit findings or regulator that has labelled this as a confidentiality breach. In the absence of this information, it increases the difficulty in accurately assessing the need for this procedure change.</p> <p>2. <u>The current drafting does not address the issue raised by the proponent (Jemena)</u></p> <p>The proposed changes to the procedures do not solve the issue raised by Jemena, in particular as we do not believe the changes is warranted. Red and Lumo consider that this change does not add any benefits to industry or is in the long term interests of consumers.</p> |   | <p>AEMO acknowledges Red/Lumo’s comment and advises the following.</p> <p>AEMO considers that there may be a confidentiality issue where the transfer has been registered in AEMO systems and the data continues to be sent to the previous FRO. The confidentiality issue does not apply to error corrections.</p> |

| STAKEHOLDER | CLAUSE/SECTION REF. | ISSUE/COMMENT                                    | PROPOSED TEXT<br><del>RED-STRIKEOUT</del> MEANS DELETE AND<br><u>BLUE UNDERLINE</u> MEANS INSERT | AEMO RESPONSE                        |
|-------------|---------------------|--|--|--------------------------------------|
| APA/AGN     | General Comment     | The proposed changes to VIC and QLD RMP are fine |  | AEMO acknowledges APA/AGN's support. |