

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

Issue Number	IN007/17		
Impacted Jurisdiction (s)	South Australia		
Proponent	Nandu Datar	Company	AEMO
Affected Gas Markets(s) <ul style="list-style-type: none"> ▪ Retail ▪ Wholesale ▪ Bulletin Board ▪ STTM 	Retail Gas	Consultation process (Ordinary or Expedited)	Ordinary
Industry Consultative forum(s) used	GRCF	Date Industry Consultative forum(s)consultation concluded	27 March 2018
Short Description of change(s)	Changes to weather observation station.		
Procedure(s) or Documentation impacted	Refer to documents listed in section 2 of this Impact and Implementation Report (IIR).		
Summary of the change(s)	Modify the Retail Market Procedure (RMP) to remove specific references to weather observation station and include a new clause that places an obligation on AEMO to maintain and consult on a separate register of weather related information. See section 1 and 9A of this IIR for further detail on these changes.		
I&IR Prepared By	Nandu Datar	Approved By	Danny McGowan
Date I&IR published	15 June 2018	Date Consultation under 135EE or 135EF concludes	12 July 2018
Contact address for written responses	Nandu Datar, Australian Energy Market Operator, GPO Box 2008, Melbourne VIC 3001		
Email Address for Responses	grcf@aemo.com.au		
Other key contact information	Nandu.datar@aemo.com.au		

IMPACT & IMPLEMENTATION REPORT – DETAILED REPORT SECTION

CRITICAL EXAMINATION OF PROPOSAL

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

Rationale:

AEMO has received advice that the Kent Town weather observation station will no longer be the official observation and forecast location for the city of Adelaide. From the 14 June 2017 the West Terrace weather observation station became Adelaide’s official observation and forecast location. The two observation stations have been operating in tandem for some months. The Kent Town station is earmarked to close in mid 2018.

The changes described in this Impact and Implementation Report (IIR) proposes that the Retail Market Procedures (RMP) SA be amended to remove specific weather observation station locations and insert a new clause that places an obligation on AEMO maintaining and publishing on its website a register of weather observation station locations and seek responses from Users and the Network Operator before making a change to the register.

The benefit of maintaining a register as opposed to “hard coding” weather observation station locations in the RMPs is it will provide AEMO with the flexibility to respond to any future changes made by the Bureau of Meteorology (BoM) in a timely manner without having to run a RMP consultation which can be unnecessarily costly and time consuming.

Summary of proposed amendments:

Appendix 11 (Heating Degree Day for South Australia) of the RMP (SA) specifies that for the Adelaide Heating Degree Day (HDD) zone, the weather data from the Kent Town weather observation station is to be used. Given Kent Town is no longer the official observation and forecast location for Adelaide the RMP will need to be amended.

Given that the weather observation station locations can change with minimal advance notice from the BoM, AEMO proposes to remove the “hard coding” of specific weather observation station location in the RMPs, and instead, maintain and publish separate register of weather observation station locations (See attachment B). Prior to implementing any changes to this register, AEMO will notify Users and the Network Operator of the proposed changes and allow them to provide feedback to AEMO.

AEMO also proposes to amend the RMP to remove specific references to weather observation stations and include a new clause that places an obligation on AEMO to maintain and consult on a register (See attachment A).

<p>2. Reference documentation</p> <ul style="list-style-type: none"> ▪ Procedure Reference ▪ GIP/Specification Pack Reference ▪ Other Reference 	<p>Retail Market Procedures (SA) – V11</p> <p>Register of Weather Observation Stations (New document)</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"> ▪ A comparison of the existing operation of the Procedures to the proposed change to the operation of the Procedures ▪ A marked up version of the Procedure change (see Attachment A) 	<p>Amend Appendix 11 (Heating Degree Day for South Australia) of the RMP (SA) to remove reference to weather observation station 'Kent Town' and specify that weather observation station for Adelaide Heating Degree Day (HDD) zone will be obtained from the new document 'Register of Weather Observation Stations'. See Attachment A for further details.</p> <p>Create a new document Register of Weather Observation Stations containing a list of weather observation station locations. See Attachment B 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 and creating a separate register containing a list of weather observation stations.</p> <p>AEMO considers the order of magnitude of this change is 'non-material'.</p>

ASSESSMENT OF LIKELY EFFECT OF PROPOSAL

<p>5. Overall Industry Cost / benefit (tangible / intangible / risk) analysis and/or cost estimates</p>	<p>Creating a separate register of weather observation stations will allow AEMO to quickly respond to changes made by the BoM.</p> <p>Section 9 of this IIR describes the consultation steps undertaken by AEMO prior to issuing this IIR. During the PPC consultation period, no participant raised any concerns in relation to cost impacts to industry or the benefits identified. AEMO has therefore concluded that there are no significant costs to implement the proposed changes and that the above benefits should be realised over time.</p>
<p>6. The likely implementation effect of the change(s) on stakeholders</p> <p>(e.g. Industry or end-users)</p>	<p>Implementation of this initiative will not require any changes to the systems or processes for SA participants. AEMO will need to make a configuration change to its system.</p>

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"> - consistency with NGL and NGR, - regard to national gas objective - regard to any applicable access arrangements 	<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 6 March 2018 AEMO published on its website a Proposed Procedure Change (PPC) that recommended minor documentation changes as described in attachment A and B. Registered participants and interested stakeholders were invited to make submissions which closed on 27 March 2018.</p> <p>AEMO received submissions from AGL, Origin Energy, and Red/Lumo supporting the proposal (Refer to Attachment C). Further changes proposed by AGL will be considered as part of the SA Harmonisation program of work (IN006/17).</p> <p>AEMO identified a need to make a minor change to section 3 of the register to remove a superfluous sentence.</p>
<p>9A – Supplementary information that has emerged post the closing date (9 May 2018) of the original IIR for further consideration</p>	<p>Outcome of initial IIR consultation</p> <p>On 11 April 2018 AEMO published on its website the initial IIR that recommended minor documentation changes as described in attachments A and B. Registered participants and interested stakeholders were invited to make submissions which closed on 9 May 2018.</p> <p>AEMO received submissions from AGL, Origin Energy and Red/Lumo supporting the proposal (Refer to Attachment D).</p> <p>The feedback that was provided and AEMO’s further investigation highlighted some complex matters, such as:</p> <ul style="list-style-type: none"> i. a request to also include the HDD coefficients in the new Register.

- ii. BOM advised that the changeover from Kent Town to West Terrace weather station is now scheduled for mid 2019.
- iii. BOM does not provide actual sunshine hours any more. They only provide forecast sunshine hours now.

Because of these, AEMO has made further amendments to the original proposal and will need to consult on those further amendments before AEMO making a decision. AEMO issued a Notice of Time Limit Extension on 16 May 2018 notifying the participants that the AEMO decision will now be published on 1 August 2018

In relation to points (i) and (ii) further amendments have been made to attachments A and B in this IIR. These are:

- Changing the weather station back to Kent Town for Adelaide Region and Adelaide Metropolitan zones in the new Register of Weather Related Information.
- Moving the coefficients for HDD calculations from RMP (SA) to the new register.
- Renaming the register as “Register of Weather Related Information”.

Registered participants and interested stakeholders are now invited to provide feedback on these further amendments to attachment A and B by COB 12 July 2018.

In relation to the BOM discontinuing provision of actual sunshine hours, AEMO has raised a new issue (IN004/18) for changes to the SA RMP clause 177(5) (Calculation of heating degree day) to accommodate forecast sunshine hours.

RECOMMENDATION(S)	
10. Should the proposed Procedures be made, (with or without amendments)?	AEMO recommends that the changes be made as proposed in attachment A and B with amendments as per the consultation forum outcome (see item 9 and 9A 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 change on 3 September 2018.</p> <p>To achieve this AEMO proposes the following timeline:</p> <ul style="list-style-type: none"> • Reissue IIR on 15 Jun 2018 • Submissions on IIR close 12 July 2018 • AEMO decision 1 August 2018 • Effective date 3 September 2018.

ATTACHMENT A

Proposed changes: Retail Market Procedures – South Australia

~~Red strikeout~~ means delete and
blue underline means insert

2. Definitions

“**Register of Weather Related Information**”, is an industry guideline document that specifies the following,

For South Australia it specifies,

- (a) For a given *HDD zone*, which weather station data must be used, and
- (b) Coefficients for *heating degree day* calculations

Appendix 11 HEATING DEGREE DAY FOR SOUTH AUSTRALIA

Sub appendix 11.1 – HDD zones

(A1)

(a) AEMO must maintain and publish a Register of Weather Related Information used to measure weather data.

(b) At least 10 business days prior to making any amendment to the list of weather observation stations and HDD Coefficients described in section 4, AEMO must inform the Gas Retail Consultative Forum (GRCF) of the change.

(1) For the purposes of clause **Error! Reference source not found.**, South Australia contains the following *positive HDD zones*:

- (a) Northern *HDD zone* ~~—for which the weather data for Ceduna must be used;~~
- (b) Adelaide Region *HDD zone* ~~—for which the weather data for Adelaide (Kent Town weather station) must be used;~~
- (c) Riverland *HDD zone* ~~—for which the weather data for Mildura must be used;~~ and
- (d) Mount Gambier *HDD zone* ~~—for which the weather data for Mount Gambier must be used.~~

The designated weather observation station for the HDD zone described in sub clause (a) to (d) are published in the register described in clause A1

(2) For the purposes of clause **Error! Reference source not found.**, South Australia contains the following *negative HDD zones*:

- (a) Adelaide Metropolitan *HDD zone* ~~—for which the weather data for Adelaide (Kent Town weather station) must be used.~~

The designated weather observation station for the HDD zone described in sub clause (a) is published in the register described in clause A1

Sub appendix 11.2 – Coefficients for heating degree day calculations

AEMO must use the value published in the register described in clause A1 set out below for each coefficient in its calculations under clause **Error! Reference source not found.**:

The numbering has been corrected below. This amendment has been confirmed by SA instructions of 30/01/09.

~~(a) — C₁ — = 0.62;~~

~~(b) — C₂ — = 0.2;~~

~~(c) — C₃ — = 0.18;~~

~~(d) — C₄ — = 1;~~

~~(e) — C₅ — = 0.44;~~

(f) ~~$C_6 = -0.385$~~ ;

(g) ~~$C_7 = 0.38$~~ ; and

(h) ~~$C_8 = 0.11$~~ .



¶

□

REGISTER OF WEATHER-RELATED INFORMATION

□

□

¶

PREPARED BY: AEMO/Markets/Market Enhancement
DOCUMENT REF: □
VERSION: 1.0
EFFECTIVE DATE: 3 September 2018
STATUS: DRAFT

□

□

□

□

□

□

□

Approved for distribution and use by:

□

APPROVED BY: Peter Geers
TITLE: Executive General Manager, Markets

□

□

□

□

□

DATE: 30/09/2018

□

¶ Section Break (Next Page)



¶

Australian Energy Market Operator Ltd ABN 94 072 010 327

..

www.aemo.com.au info@aemo.com.au

NEW SOUTH WALES • QUEENSLAND • SOUTH AUSTRALIA • VICTORIA • AUSTRALIAN CAPITAL TERRITORY • TASMANIA • WESTERN AUSTRALIA



VERSION RELEASE HISTORY

Version	Effective Date	Summary of Changes
1.0	03/09/2018	First Issue

¶

.....Page Break.....¶

¶
¶
¶

■ CONTENTS¶

1. → PURPOSE AND SCOPE	→	4¶
2. → RELATED DOCUMENTS	→	4¶
3. → CHANGE PROCESS TO AMEND THIS REGISTER.	→	5¶
4. → SOUTH AUSTRALIAN WEATHER RELATED INFORMATION.	→	5¶
4.1. → Weather Observation Stations	→	5¶
4.2. → HDD Coefficients	→	5¶

¶

■ TABLES¶

Table 1 → Weather Observation Stations	→	5¶
¶..... Section Break (Next Page)		

1. → PURPOSE AND SCOPE

¶

National Gas Rules (NGR) allow for AEMO to make Retail Market Procedures (RMP). RMPs are the approved regulatory standards that place fundamental obligations on AEMO, Distributors and Retailers. The RMPs describe various obligations that facilitate interaction between parties in the market.

In relation to meter data, the RMPs contain obligations that apply if meter data is not available or unable to be obtained. These obligations often set out requirements to produce an estimated read. Weather data is often used in the calculation of an estimated read.

This document contains weather related information applicable for each jurisdiction where they are not prescribed in the RMP.

2. → RELATED DOCUMENTS

¶

Reference	Title	Location
Ref #1	Retail Market Procedures (RMP) South Australia	Published on AEMO website
=	=	=
=	=	=
=	=	=
=	=	=

¶

.....Page Break.....¶

¶

3. → CHANGE PROCESS TO AMEND THIS REGISTER.¶

AEMO is responsible for maintaining weather-related information described in this document.¶

At least 10 business days prior to making any amendment to weather-related information below, AEMO must inform the Gas Retail Consultative Forum (GRCF) of the change.¶

4. → SOUTH AUSTRALIAN WEATHER-RELATED INFORMATION.¶

4.1. → Weather Observation Stations¶

The following is a list of the weather observation stations applicable to Appendix 11 (Heating Degree Day for South Australia) of the Retail Market Procedures (RMP) (SA) (Ref#1).¶

¶

Table 1 → Weather Observation Stations¶

Heating Degree Day (HDD) zone¶	Service Provider¶	Observation station¶
Northern¶	Australian Government Bureau of Meteorology¶	Ceduna¶
Adelaide Region¶	Australian Government Bureau of Meteorology¶	Kent Town / Ngayindarra ¶
Riverland¶	Australian Government Bureau of Meteorology¶	Mildura¶
Mount Gambler¶	Australian Government Bureau of Meteorology¶	Mount Gambler¶
Adelaide Metropolitan¶	Australian Government Bureau of Meteorology¶	Kent Town / Ngayindarra ¶

¶

4.2. → HDD Coefficients¶

The following is a list of HDD Coefficients applicable to Appendix 11 (Heating Degree Day for South Australia) of the RMP (SA) (Ref#1)¶

The numbering has been corrected below. This amendment has been confirmed by SA instructions of 30/01/09.¶

- (a) → C₁ → =0.62;¶
- (b) → C₂ → =0.2;¶
- (c) → C₃ → =0.18;¶
- (d) → C₄ → =1;¶
- (e) → C₅ → =0.44;¶
- (f) → C₆ → =-0.385;¶
- (g) → C₇ → =0.38; and¶
- (h) → C₈ → =0.11.¶

¶

¶

ATTACHMENT C – Consolidated List of Stakeholder Feedback to Proposed Procedure Change

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT RED STRIKEOUT MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
AGL	11.1 (1)	Suggest that the specific HDD zones also be removed from the RMPs, and included in the same document as the weather stations	(a) ... <u>maintain and publish a register of weather observation station locations and associated HDD zones</u>	AEMO acknowledges AGL's proposed change and advises that this change will be considered as part of the SA Harmonisation program of work (IN006/17).
AGL	Draft Register	Noting that Adelaide Metropolitan is a negative HDD there should be relevant commentary in an updated register to identify this fact.	<u>Suggest comment in table 1 of register.</u>	AEMO acknowledges AGL's proposed change and advises that this change will be considered as part of the SA Harmonisation program of work (IN006/17).
AGL	RMP CI 177 APP 11 FRC B2B System Interface Definitions	SA CI 177 requires recalculation of various co-efficients associated with Heating Degree Day and must recalculate when a weather station changes. It is suggested that these co-efficients are also published within the register of weather stations and be removed from the RMPs as appendix 11.	(2) AEMO must, ...update to Appendix 11 <u>the register of Weather Observation Station Locations specifying</u>	AEMO acknowledges AGL's proposed change and advises that this change will be considered as part of the SA Harmonisation program of work (IN006/17).

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT RED STRIKEOUT MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
AGL	App 11	For the same reasons it is also suggested that the remaining information within Appendix 11 (cl (3)) also be relocated to the weather station listing.		AEMO acknowledges AGL's proposed change and advises that this change will be considered as part of the SA Harmonisation Program of work (IN006/17).
AGL	App 3	Appendix 3 (Calculation of MIRN checksum) could also be relocated to the AEMO generic MIRN document		AEMO acknowledges AGL's proposed change and advises that this change will be considered as part of the SA Harmonisation Program (IN006/17).
Origin Energy	General	Changes are acceptable to Origin		AEMO acknowledges Origin Energy's support
Red/Lumo	Sub appendix 11.1 (A1)	Red and Lumo suggest it is imperative that AEMO define the term <i>reasonable time</i> . We propose AEMO gives Users and Network Operators 10 Business days' time notice of changes to the published register of weather station locations.	i. Allow a reasonable time <u>10 business days' notice</u> to receive Users and Network operators responses to the proposed register of weather observation stations locations	AEMO does not support Red/Lumo's proposal. AEMO has similar obligation set out in notifying changes to Energy Value Validation Ranges (CI 3.6.10 of NSW/ACT RMP) or FCLP Amount Calculation Methodology (CI 8.6.7 g of NSW/ACT RMP) where a timeframe in number of days is not specified.

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT RED STRIKEOUT MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
		It is only in a rare event of unforeseen circumstances that this notice period is to be waived. AEMO receives advanced notice of changes to weather stations and therefore it is not unrealistic to expect AEMO advises market within a timeframe that allows the necessary changes be made where applicable.		
AEMO	Section 3 of the register of weather observation stations used in gas retail markets	The document contains a superfluous statement indicating that AEMO receives changes to weather observation stations from Bureau of Meteorology.	AEMO (CGI) receives any changes to weather observation stations from the BoM.	AEMO has removed the sentence.

ATTACHMENT D – Consolidated List of Stakeholder Feedback to initial Impact & Implementation Report

SUBMISSIONS RELATING TO THE IIR 11 APR 2018 TO 9 MAY 2018 – ORIGINAL CONSULTATION PERIOD				
DATE	PARTICIPANT	ISSUE / COMMENT	PROPOSED TEXT	AEMO COMMENTS
1	9 May 2018	AGL	<p><u>In relation to Sections 1 to 4 of the IIR – IN007/17</u></p> <p>AGL believes that AEMO’s assessment of the proposed change is not complete at this point in time.</p> <p>The benefit of this proposed changes specified by AEMO was to simplify the process for a change in weather station:</p> <p>However, as provided in the AGL PPC feedback there are additional changes that result from the change of a weather station. RMP SA Cl 177 requires various Heating Day coefficients to be recalculated following a change in weather station. These coefficients are also hard coded into the procedures (Appendix 11.2) and will require a consultation to amend.</p> <p>Changes to these coefficients should also be efficiently managed without the need for procedure change.</p> <p>AGL is concerned that the change in weather station will lead to different weather data supplied to the market. The impact of this weather data on the retail market is represented</p>	<p><u>In relation to Sections 1 to 4 of the IIR – IN007/17</u></p> <p>AEMO has extended the time limit for this consultation in view of participant feedback to extend the scope of new Register of Heating Degree Day Zone Details.</p> <p>AEMO has also raised a new issue (IN004/18) for changes to the SA RMP clause 177(5) (Calculation of heating degree day) to accommodate forecast sunshine hours</p>

SUBMISSIONS RELATING TO THE IIR 11 APR 2018 TO 9 MAY 2018 – ORIGINAL CONSULTATION PERIOD

	DATE	PARTICIPANT	ISSUE / COMMENT	PROPOSED TEXT	AEMO COMMENTS
			<p>by the coefficients calculated per cl 177 which are currently set for the current weather station.</p> <p>AGL would like clarity from AEMO on the next steps to recalculate the coefficients and their application to the SA market.</p>		
2	9 May 2018	AGL	<p><u>In relation to Sections 5 to 9 of the IIR – IN007/17</u></p> <p>The proposal as it stands will meet the IIR intention but flow on effects from the change of weather station also need to be dealt with.</p>		<p><u>In relation to Sections 5 to 9 of the IIR – IN007/17</u></p> <p>AEMO acknowledges AGL’s support</p>
3	9 May 2018	AGL	<p><u>In relation to Sections 10 of the IIR – IN007/17</u></p> <p>AGL supports this proposed change but believes that more work is needed to gain the greatest efficiency from the proposal.</p>		<p><u>In relation to Sections 10 of the IIR – IN007/17</u></p> <p>AEMO acknowledges AGL’s support</p>
4	9 May 2018	AGL	<p><u>In relation to SA RMP Cl 177, App 11</u></p> <p>SA Cl 177 requires recalculation of various coefficients associated with Heating Degree Day and these must be recalculated when a weather station changes.</p>	<p>(2) AEMO must,update to Appendix 11 the register of Weather Observation Station Locations specifying.....</p>	<p><u>In relation to SA RMP Cl 177, App 11</u></p> <p>AEMO has moved the coefficients from RMP SA to the new Register.</p>

SUBMISSIONS RELATING TO THE IIR 11 APR 2018 TO 9 MAY 2018 – ORIGINAL CONSULTATION PERIOD

	DATE	PARTICIPANT	ISSUE / COMMENT	PROPOSED TEXT	AEMO COMMENTS
			It is suggested that these coefficients are published within the register of weather stations and removed from the RMPs as appendix 11 to make the process consistent.		AEMO has also raised a new issue (IN004/18) for changes to the SA RMP clause 177(5) (Calculation of heating degree day) to accommodate forecast sunshine hours.
5	9 May 2018	AGL	<u>In relation to SA RMP App 11</u> For the same reasons it is also suggested that the remaining information within Appendix 11 (cl (3)) also be relocated to the weather station listing.		<u>In relation to SA RMP App 11</u> AEMO acknowledges AGL's proposed change and advises that this change requires further analysis and hence will be considered as part of the SA Harmonisation Program of work (IN006/17).
6	9 May 2018	AGL	<u>In relation to SA RMP App 3</u> Appendix 3 (Calculation of MIRN checksum) could also be relocated to the AEMO generic MIRN document		<u>In relation to SA RMP App 3</u> AEMO notes AGL's feedback and wishes to advise that this request has already been fulfilled. Please refer to the MIRN Structure Document from AEMO website.
7	8 May 2018	Origin Energy	<u>In relation to Sections 1 to 4 of the IIR – IN007/17</u>		<u>In relation to Sections 1 to 4 of the IIR – IN007/17</u> AEMO has extended the time limit for this consultation in

SUBMISSIONS RELATING TO THE IIR 11 APR 2018 TO 9 MAY 2018 – ORIGINAL CONSULTATION PERIOD

	DATE	PARTICIPANT	ISSUE / COMMENT	PROPOSED TEXT	AEMO COMMENTS
			<p>Yes. Origin supports the register of weather observations stations.</p> <p>In review of the IIR and attachment C (Consolidated list of stakeholder feedback), Origin observes that it would benefit to shift the co-efficient values hardcoded into Appendix 11 to a register.</p> <p>We acknowledge this may not be in scope for the IIR but strongly recommend this be part of the SA harmonisation program.</p>		<p>view of participant feedback to extend the scope of new Register of Heating Degree Day Zone Details.</p> <p>AEMO has also raised a new issue (IN004/18) for changes to the SA RMP clause 177(5) (Calculation of heating degree day) to accommodate forecast sunshine hours</p>
8	8 May 2018	Origin Energy	<p><u>In relation to Sections 5 to 9 of the IIR – IN007/17</u></p> <p>Yes</p>		<p><u>In relation to Sections 5 to 9 of the IIR – IN007/17</u></p> <p>AEMO acknowledges Origin Energy’s support</p>
9	8 May 2018	Origin Energy	<p><u>In relation to Sections 10 of the IIR – IN007/17</u></p> <p>Yes</p>		<p><u>In relation to Sections 10 of the IIR – IN007/17</u></p> <p>AEMO acknowledges Origin Energy’s support</p>
10	9 May 2018	Red/Lumo	<p><u>In relation to Sections 1 to 4 of the IIR – IN007/17</u></p> <p>Red and Lumo Energy supports the proposal and agree with the assessment undertaken by</p>		<p><u>In relation to Sections 1 to 4 of the IIR – IN007/17</u></p> <p>AEMO acknowledges Red and Lumo’s support.</p>

SUBMISSIONS RELATING TO THE IIR 11 APR 2018 TO 9 MAY 2018 – ORIGINAL CONSULTATION PERIOD

	DATE	PARTICIPANT	ISSUE / COMMENT	PROPOSED TEXT	AEMO COMMENTS
			AEMO as outlined in the Impact & Implementation Report (IIR).		
11	9 May 2018	Red/Lumo	<p><u>In relation to Sections 5 to 9 of the IIR – IN007/17</u></p> <p>Red and Lumo support AEMO’s assessment and agree that the magnitude of this change is considered ‘non-material’.</p>		<p><u>In relation to Sections 5 to 9 of the IIR – IN007/17</u></p> <p>AEMO acknowledges Red and Lumo’s support</p>
12	9 May 2018	Red/Lumo	<p><u>In relation to Sections 10 of the IIR – IN007/17</u></p> <p>Red and Lumo Energy supports AEMO’s recommendation to support the procedure changes. However, we note that there are further improvement opportunities to the SA RMP that directly relate to the procedure changes outlined in this IIR that should be considered. In particular the recalculation of various co-efficients associated with Heating Degree Day or a weather station change, and the potential inclusion of the related Appendix to AEMO’s proposed Weather Station Listing document.</p>		<p><u>In relation to Sections 10 of the IIR – IN007/17</u></p> <p>AEMO acknowledges Red and Lumo’s support</p> <p>AEMO has extended the time limit for this consultation in view of participant feedback to extend the scope of new Register of Heating Degree Day Zone Details.</p>