

IMPACT & IMPLEMENTATION REPORT (IIR)

Summary Section

Issue Number	IN003/20W		
Impacted Jurisdiction(s)	Western Australia (WA)		
Proponent	Joe Sanches	Company	ATCO Gas
Affected Gas Market(s)	<ul style="list-style-type: none"> Retail 	Consultation process (Ordinary or Expedited)	Ordinary
Industry Consultative forum(s) used	GRCF	Date Industry Consultative forum(s) consultation concluded	24 July 2020
Short Description of change(s)	WA CDN and CDR		
Procedure(s) or Documentation impacted	WA Technical Protocols		
Summary of the change(s)	Update the gas retail market business processes, IT systems, and underpinning technical protocols to incorporate the following two aseXML transactions - CustomerDetailsNotification (CDN) and CustomerDetailsRequest (CDR) in the WA market.		
IIR Prepared By	Arjun Pathy	Approved By	Michelle Norris
Date IIR published	13 August 2020	Date Consultation under 135EE or 135EF concludes	10 September 2020
Email Address for Responses	grcf@aemo.com.au		
Other key contact information	arjun.pathy@aemo.com.au		



CRITICAL EXAMINATION OF PROPOSAL

1. DESCRIPTION OF ISSUE

As the network operator, ATCO Gas is responsible for undertaking works, including reconnections, planned and unplanned interruptions, and meter replacements. These works generally requires the network operator to communicate with customers, and the network operator is frequently uncertain of the accuracy of the details they have or wishes to verify customer details. This frequently results in ATCO Gas's asking Users to manually produce customer information and re-send it to them to support communications to customers. This becomes a substantial burden when dealing with unplanned outages for potentially large numbers of customers and very short time frames.

To resolve this cumbersome process, ATCO Gas has proposed that the WA gas retail market adopt the CustomerDetailsNotification (CDN) and CustomerDetailsRequest (CDR) transactions in aseXML schema version r38.

East coast gas retail market participants are also considering adopting the same transactions as part of their broader schema uplift in Q4 2021 as part of [consultation IN011/20](#).

2. REFERENCE DOCUMENTATION

2.1. Technical Protocol (TP) documentation

Please refer to Attachment B which provides a detailed summary of the changes to each of the Technical Protocol (TP) documents.

2.2. Schema Release documentations

Click [here](#) to view the index of Schema Releases from r13 to r38 inclusive.

3. OVERVIEW OF CHANGES

All Users and the Network Operator will need to make IT system changes, which will include incorporating the CDN and CDR transactions into WA gas retail market systems and modifying gas gateways to send and receive r38 transactions (see section 4 of the IIR for further information on IT system requirements).

The changes that AEMO will need to make include modification to the:

- WA gas retail market pre-production/certification environment responders to support r38 transactions.
- WA gas gateways to support sending and receiving r38 transactions. This includes ensuring that the WA Low Volume Interface (LVI) system supports the sending and receiving transactions in the r38 format.

As indicated in section 1 of this IIR, a change of this nature will mean that AEMO, the network operator and all Users must migrate to schema version r38 concurrently¹. AEMO will therefore undertake a co-ordinated release program, which will include recertifying any modified transactions. For further details on the technical aspects of this change, please refer to section 4 of this IIR.

¹ AEMO is aware that GRFC participants are considering uplifts past aseXML schema version r38 as part of consultations IN002/15W and IN026/15 for WA and east-coast jurisdictions respectively. Since the requirements for this consultation only necessitate a move to aseXML schema version r38, the track-changes Technical Protocol documents for this consultation only indicate r38. AEMO will indicate any incremental schema version in consultation documents for IN002/15W.



AEMO proposes a number of amendments to the TP documents for IT systems changes needed to adopt the CDN and CDR transactions and uplift the aseXML schema version to r38. A summary of the proposed TP amendments is presented in Attachment B. The tracked changes between the current version and the proposed changes are presented in Attachment E.

4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

Below is a summary of what AEMO envisages will be the impact on AEMO, users, and the network operator. This change will not impact a self-contracting user² (SCU). No participant indicated that the below summary was inaccurate in feedback to the PCR.

4.1. Effect on user and the network operator

The implementation effect across industry will see the introduction of a secure reliable system to manage customer information. For this to be achieved, all Users and the Network Operator will need to make the following IT system changes:

- Modify gas gateways to send and receive transactions in aseXML schema version r38.
- Incorporate the gas CDN and CDR transactions into gas retail market systems.
- One month prior to the implementation date, complete a recertification process on all impacted transactions in accordance with process described in the Connectivity Testing and Technical Certification³ document.

4.2. Effect on AEMO

4.2.1. FRC Hub changes

AEMO will need to ensure that r38 transactions can pass through the FRC Hub. For this to be achieved AEMO will need to make the following IT system changes:

- Modify AEMO's gas gateways (including those managed by CGI, AEMO's outsourced service provider for WA gateways) so they have the capability to send and receive r38 transactions.
- Modify the pre-production/certification environment responders to support the r38 CDN and CDR transactions.
- One month prior to the implementation date, complete a recertification process on all impacted transaction in accordance with process described in the Connectivity Testing and Technical Certification document.

In addition to these technical changes, AEMO will prepare a schema manifest document that summarises each schema version change and will also facilitate the coordinated release program, as it has done for prior gas retail market aseXML schema uplift changes.

4.2.2. Implementation timeframes

In terms of an implementation timeframe, as noted in section 1 of this PRC, bundling these WA changes with the east coast r38 program of work in Q4 2021 would be a cost-effective means to implement the changes. No participant opposed this bundling in feedback to the PCR.

² Clause 2 (Definition) of the WA Retail Market Procedures defines the term "self-contracting user" as: "means a user that withdraws gas from a sub-network for the sole purpose of supply to a customer that is either itself or a related body corporate"

³ The current published version of the Connectivity Testing and Technical Certification document can be found clicking [here](#).



5. OVERALL COSTS, BENEFITS, AND MAGNITUDE OF THE CHANGES

The benefits identified as part of pre-consultation include:

- WA gas retail market participants’ increased ability to manage their regulatory obligations.
- Efficiencies for users when generating responses to ad-hoc requests for customer information.
- Improved timeframes for providing customer information.
- Ensuring that the network operator has up-to-date customer contact information.
- Efficiencies for users who operate in WA and the east coast, since all markets will be on the same schema.

At the time of preparing this IIR, AEMO is yet to obtain estimated costs to implement this change. Given the implementation is leveraging the program of works for the east coast initiatives - IN003/20 (Gas Life Support) and potentially IN011/20 (east coast CDN and CDR), AEMO envisages that the cost to implement this change will not be substantive. There is no direct benefit for AEMO.

The estimated cost for WA gas retail market participants to implement this change will vary for each organisation and depend on several factors, including but not limited to, the complexity of IT system changes for that organisation.

All respondents to the Procedure Change Request (PCR) supported the proposal (i.e. indicated that the benefits outweigh the costs; see Attachment C).

As such, AEMO believes that the change represents a net benefit for the WA gas retail market as a whole.

6. MAGNITUDE OF THE CHANGES

AEMO has deemed this change to be material because of the change to IT systems and the industry coordination effort required to uplift the aseXML schema to schema version r38.

7. AEMO'S PRELIMINARY ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH CLAUSE 378 OF THE RMP

As part of the first-round consultation (PCR), AEMO put forward the following assessment regarding compliance with clause 378 of the Retail Market Procedures (RMP).

<p>Ensure that the retail gas market operates and is governed in a manner that is,</p> <ul style="list-style-type: none"> (i) open and competitive; (ii) efficient; and (iii) fair to participants and their customers 	<p>AEMO’s view is that the proposed change will continue to promote competition, is not unreasonably costly to implement and does not disadvantage participants or their customers.</p>
<p>Ensure compliance with all applicable laws</p>	<p>The proposed changes described in the IIR set the usage of this transaction as optional for participants. On that basis, AEMO’s view is that the proposed changes do not contravene applicable laws.</p>
<p>Ensure effective consultation occurs and gives stakeholder’s opportunities to provide feedback of the proposed changes</p>	<p>AEMO’s view is that the PCR and IIR rounds of this consultation will have provided stakeholders with</p>



	opportunities to provide feedback on the proposed changes.
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No participant put forward any opposing views in relation to AEMO assessment during the first-round consultation therefore AEMO maintains its original assessment described in the previous points as noted above.

8. CONSULTATION FORUM OUTCOMES

All participants supported the initiative, contingent on it being incorporated with the other schema change initiatives under consideration by the Gas Retail Consultative Forum (GRCF) (e.g. IN003/20). Some participants gave technical feedback on the draft TP documents; this feedback and AEMO's response thereto is provided in Attachment D.

9. AUTHORISATION REVIEW

The Australian Competition and Consumer Commission (ACCC) granted Authorisations to REMCo to operate Chapter 5 (Allocation, Reconciliation and Swing) and Chapter 6 (Compliance and Interpretation) of the RMPs and associated ancillary deeds. The ACCC approved variations to the Authorisations to enable REMCo to transfer administration to AEMO.

Authorisation is a process where the ACCC may grant protection from legal action for anti-competitive conduct that might otherwise breach the Competition and Consumer Act 2010 (the CCA) where there is an offsetting public benefit from the conduct.

Changes to the RMP Chapters and ancillary deeds covered by the Authorisations must be assessed to determine whether the change impacts the Authorisation.

Because this proposal requires no changes to any of the clauses in Chapters 5 and 6 of the RMP or ancillary deeds covered by the Authorisations, a review of the ACCC Authorisations is not required.



IMPACT & IMPLEMENTATION REPORT - RECOMMENDATIONS

10. SHOULD THE PROPOSED PROCEDURES BE MADE?

AEMO recommends that the proposed changes to the RMP WA as described in this IIR be made.

11. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO will implement the changes described in this PCR targeted to take effect sometime between Q4 (Oct-Dec) 2021 and Q2 (Mar-Jun) 2022. In order to achieve this timeline, AEMO proposes the following key milestones:

- IIR issued 13 August 2020.
- IIR submissions close 10 September 2020.
- AEMO recommendation to the Economic Regulation Authority issued Q4 2020.



ATTACHMENT A – PCR RESPONSE TEMPLATE

The PCR response template has been attached separately to this document. There are two sections in the template:

- Section 1 seeks feedback on AEMO’s examination of the proposed changes.
- Section 2 seeks feedback on the marked-up changes to the TP described in Attachments E.

Anyone wishing to make a submission to this IIR consultation are to use this response template.

Submissions close Monday 10 September 2020 and should be emailed to grcf@aemo.com.au.



ATTACHMENT B – TECHNICAL PROTOCOL REFERENCE DOCUMENTATION (SEE SECTION 2)

The following table lists TP documents that need to be amended. Since initiative IN011/20 (CDN and CDR changes for east coast gas retail markets) already proposes the implementation of the CDN and CDR transactions for the South Australian gas retail market, the changes to the Specification Pack documents are shown as incremental on those proposed in the IN011/20 IIR.

Ref#	Title of document and any notes.	Current Ver #	Summary of the changes between proposed procedures and the version proposed as part of IN011/20 IIR
1	<p>AEMO Specification Pack - FRC B2B System Interface Definitions</p> <p>Marked up showing differences between current version and version proposed as part of IN011/20 IIR</p>	4.6	<ol style="list-style-type: none"> Updated version history table. Amended sections 4.6 and 4.7 to refer to both WA and SA, instead of just SA.
2	<p>AEMO Specification Pack- Specification Pack Usage Guidelines</p> <p>Marked up showing differences between current version and version proposed as part of IN011/20 IIR</p>	8.1	<ol style="list-style-type: none"> Updated version history table. Amended WA aseXML schema version to be r38.



ATTACHMENT C – GENERAL FEEDBACK GIVEN TO PCR

Topic	Ref #	Company	Response	AEMO Response
Sections 1 to 9 of the PCR sets out details of the proposal.	1	AGL	AGL believes that AEMO has assessed the proposal appropriately.	AEMO acknowledges AGL's support for AEMO's assessment.
Does your organisation supports AEMO's assessment of the proposal? If no, please specify areas in which your organisation disputes AEMO's assessment (include PCR section reference number) of the proposal and include information that supports your organisation's rationale for not supporting AEMO's assessment.	2	Alinta Energy	Alinta Energy supports the overall proposal to adopt the Customer Details Notification (CDN) and Customer Details Request (CDR) transactions in the aseXML schema. We understand that to achieve this, the current aseXML schema version r13 will need to be upgraded to a schema version beyond r38 and we support bundling this program of work with the other programs of work scheduled for both the west and east coasts. This will ensure a more cost effective and efficient outcome for both AEMO and market participants.	AEMO acknowledges Alinta Energy's overall support for the proposal and for the bundling of the change with other IT changes.



Topic	Ref #	Company	Response	AEMO Response
	3	Origin Energy	<p>Origin Energy supports this change if bundled with other East Coast and WA gas market changes. This would be beneficial from a cost and efficiency perspective as testing and development of transactions will be done at the same time.</p> <p>In terms of the timeline outlined in section 1.2 (Q4 2021), Origin Energy recommend that due to several other initiatives the market has scheduled for Q4 2021 i.e. 5 Minute Settlements, B2B Procedures for Electricity, that all gas market changes be moved to 2022 to alleviate the risks associated with multiple market changes occurring within a short timeframe.</p>	<p>AEMO acknowledges Origin Energy's support for the proposal, contingent on their concurrent implementation with the other proposed gas retail market changes.</p> <p>Regarding the implementation date, AEMO notes that a number of other consultations—including consultations already finished, such as IN003/20 (Gas Life Support)—rely on this Q4 2021 implementation date, and both AEMO and participants have provided costs and benefits for that date. As such, in this consultation IN003/20W, AEMO will proceed with a Q4 2021 proposed implementation date. A movement away from the Q4 2021 implementation date would have to be considered holistically, by both east- and west-coast participants for all consultations with schema impacts.</p>



Topic	Ref #	Company	Response	AEMO Response
	4	Simply Energy	<p>Simply Energy supports AEMO’s assessment of the proposal, provided the implementation is a part of the holistic program of works for the east coast initiatives IN003/20 (Gas Life Support) as well as IN011/20 (east coast CDN and CDR),</p> <p>As Simply Energy indicated earlier, Simply Energy would agree to make WA market’s CDN/CDR transaction from csv to xml, as well as inclusion of CDR transaction, when harmonised with other Gas jurisdictions, to avoid bespoke-build requirements for WA Gas.</p>	AEMO notes Simply Energy’s support for AEMO’s assessment of the proposal, contingent on the proposal’s concurrent implementation with other proposed initiatives with schema impacts.
	5	Synergy	Yes, Synergy supports the AEMO’s assessment of the proposal	AEMO notes Synergy’s support for AEMO’s assessment of the proposal.

ATTACHMENT D – TECHNICAL FEEDBACK GIVEN TO PCR

Ref # 1 - AEMO Specification Pack - FRC B2B System Interface Definitions					
Ref \$	Organisation	RMP Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
6	AGL		AGL notes that there is no process diagram for CDR and suggest that one be included clarifying that a CDN is sent in response to a CDR.		AEMO has included a process diagram for use of the CDR in WA.
7	AGL		AGL notes that there is a different usage of the CDN for SA versus WA. In SA, the Retailer will automatically send a CDN to a network when the customer details change, whereas in WA, the CDN will only be sent in response to a CDR. The information in the Specification pack should show this clearly.		AEMO has amended the wording in section 4.6.2 to reflect the WA-specific usage.
8	Origin Energy	4.6.1 – Process Diagram (p172)	This process flow requires an update to make it WA specific i.e. CDN publishing only in response to CDR, or can AEMO confirm if the CDN is sent in all scenarios i.e. new customer, update to customer details?		Please see AEMO's response to Ref #6.
9	Origin Energy	4.6.2.1 CustomerDetailsNotification	For WA, the proposal is for the Retailer to issue CDN only in response to CDR. On page 173 of FRC B2B System Interface		Please see AEMO's response to Ref #7.



			Definitions document, no such precondition is documented. This seems to refer to East Coast process. Should this pre-condition be outlined clearly in this document?		
10	Origin Energy	4.6.2.1 Transaction Data Elements	CDN transaction details on page 174 should include details on 'Usage' of below elements. E.g. for 'Sensitive Load' – should this be populated as 'None' for WA?		Usage information is detailed in Appendix A and as such will not be replicated in Section 4.6.2.1. Regarding use of specific fields, such as "Sensitive Load", AEMO considers that consultation IN003/20W is intended to provide WA participants with the r38 versions of the CDN and CDR transactions, as opposed to prescribing specifically how these transactions should be used. AEMO therefore considers the use of the "Sensitive Load" field to be a matter for WA participants to determine.
11	Origin Energy	4.6.2.1	General Comment: CDR and CDN examples provided in document refer to CSV files. These need to be replaced with aseXML sample transactions		AEMO has provided sample transactions.



12	Simply Energy	Transaction T 71	Since T 71 is also a transaction under AMENDCUSTOMERDETAILS, the data elements proposed for the newly created T 70 should be mapped against the current T 71 and harmonized accordingly, while T 71 can stay as csv file.		AEMO notes in the first instance that T71 is not used in WA (i.e. is an SA-only transaction) and on that basis cannot consider amendments to T71 as part of this consultation. However, AEMO appreciates the need for participants to have the CDN structures mirrored between the standard transaction (T70) and the six-monthly reconciliation transaction (T71). AGL has already raised feedback to this effect as part of IN011/20 (see Ref #12 in the IIR feedback section), specifically suggesting that the T71 transaction be deleted. AEMO agreed in feedback to AGL to add this initiative to a “residual tidy-up” consultation for all east-coast schema initiatives and will therefore consider Simply Energy’s feedback as part of that residual consultation.
13	Simply Energy	E.g. Page 202	The abbreviations such as ‘MC’, ‘MPB’ etc. are defined in electricity markets however have been copied in the Reason field of CDR/CDN transactions. These texts need to be		AEMO recognises that this terminology needs to be updated for gas retail markets; however, since the allowable values for



			reviewed and amended according to the gas markets terminology.		the Reason field affect both SA and WA, AEMO is unable to make the change for both jurisdictions as part of this consultation. AEMO will make Simply Energy's recommended changes for WA only as part of this consultation, and AEMO will add this problem for SA to the residual tidy-up consultation.
14	Synergy	Reason field 'Missing Customer Details'	Synergy considers that the 'Other' value on the 'Customer Details Request' should not be included as an option to be sent for requesting information. It leaves room for interpretation as to why the request was sent which will require manual intervention to be analysed, reviewed and addressed. Synergy considers that a clearly specified list of reasons with their corresponding definitions should be permitted so that these requests can be addressed in a timely manner.	"Other" must only be used for scenarios not covered by the specified allowed values. The Retailer or Distributor must provide the details of the reason in the SpecialNotes field	AEMO and the GRCF agreed to take up the CDR transaction as it exists in r38
15	Synergy	Reason field 'Missing Customer Details'	Synergy considers that the 'Missing Customer Details' value should be renamed to 'Out of Date Customer Details' to more accurately reflect the definition provided. This will provide clearer automation opportunities to	"Missing Customer Details" "Out of Date Customer Details" means the DNSP/ MC/MPB reasonably believes the customer details have changed and the Retailer has not provided a Notification of the Changes (e.g. move-in has occurred)	The allowable values for the Request field are enumerated in the aseXML schema (see the CustomerDetails_r38.xsd file in the latest schema).



			provide a full update of all the customer information, rather than the current naming which could mean that there are only particular missing customer values.		As such, no renaming of the field will be considered. Participants are welcome, however, to determine by bilateral arrangements that the "Missing Customer Details" reason code should only be used for when customer details are out of date.
Ref # 2 - AEMO Specification Pack- Specification Pack Usage Guidelines					
		No comments			



ATTACHMENT E – DOCUMENTATION CHANGES (SEE SECTION 3)

Draft versions of the TPs are attached separately to this document.