

PPC response template for IN011/20 (modify CDN and add CDR) – Responses to be emailed to grcf@aemo.com.au by due **12 June 2020**.

Review comments submitted by: *Simply Energy*

Date: *12 June 2020*

Contact Person: *Aakash Sembey*

Please complete sections 1 and 2. Section 3 is optional.

Section 1 - General Comments on the Proposed Procedure Change

Topic	Please Provide Response Here
<p>Sections 1 to 9 of the PPC sets out details of the proposal.</p> <p>Does your organisation supports AEMO' s assessment of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO's assessment (include PPC section reference number) of the proposal and include information that supports your organisation rational why you do not support AEMO's assessment.</p>	<p>Simply Energy understands that this initiative will proceed only if initiative IN003/20 proceeds (Gas Life Support) so that the costs of implementing CDN / CDR do not include the cost of upgrading to r38. However, the cost of schema upgrade is not as material as compared to the cost of a new transaction, i.e. CDR. As with any new transaction, new event/rejection codes need to be implemented and which require manual intervention via exception management. This adds to the on-going cost of implementation, significantly.</p> <p>Consistent with Simply Energy's earlier feedback provided for the GMI, Simply Energy do not support the proposal, due to the following:</p> <ul style="list-style-type: none"> • the transactions do not necessarily need to be mirrored with electricity markets where it can be simplified for gas; • CDN is already in place for the gas markets and, based on our assessment, it works, regardless of it being csv file based;

- to simplify and reduce the overall cost of implementation across the industry, Simply Energy believes there is no benefit to pursue the changes suggested in the PPC for CDR;
- Gas processes are different to Electricity and we do not need to mimic transactions that are not required and as such, we see no benefit to 'fully align' the transactions used in gas and electricity retail markets.

Moreover, we understand that Gas Life Support initiative IN003/20 can be dealt in isolation to this PPC. In Electricity Retail Market, CDN/CDR was not changed due to the introduction on LSN/LSR and as such, we see no reason to change the existing CDN logic in Gas, in order to implement LSN/LSR in Gas Retail Market.

In summary, Simply Energy believes that this would be a 'cost-only' exercise in implementing this PPC and the cost outweighs the benefit due to:

- additional cost of implementing new processes;
- additional cost of implementing ase-xml logic instead of csv logic;
- additional cost of implementing CDR transactions, and underlying system validations;
- additional cost of handling for CDR transactions, exception management, agent training, etc.

Section 2 - Feedback on the documentation changes in the Attachments of the PPC.

Victoria

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

Participant Build Pack 1 - Table of Transactions, Table of Elements, List of Job Enquiry Codes, Address Elements and MIRN and Meter states.

RMP Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Participant Build Pack 3 - Interface Definitions

Gas Interface Protocol – Victoria

Queensland

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

Gas Interface Protocol – Qld

RMP Clause #	Issue / Comment	Proposed text Red strik means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

NSW/ACT

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

NSW/ACT specific Participant Build Pack 5.

RMP Clause #	Issue / Comment	Proposed text Red strik means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

NSW/ACT Wagga Wagga and Tamworth specific Participant Build Pack 6

Gas Interface Protocol – NSW/ACT

SA

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

AEMO Specification Pack - FRC B2B System Interface Definitions

RMP Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

AEMO Specification Pack- Specification Pack Usage Guidelines

Section 3¹ – Additional feedback that is not part of this consultation but warrants further investigations / discussions.

Topic	Please Provide Response Here
Does your organisation have any feedback / suggestions that closely relate to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please included your feedback / suggestions.	

¹ Note - This feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process