

PROPOSED PROCEDURE CHANGE (PPC)

Issue Number	IN004/17		
Impacted Jurisdiction(s)	NSW/ACT, Qld, SA and Vic		
Proponent		Company	AEMO
Proponent e-mail	grcf@aemo.com.au	Proponent phone #	
Affected Gas Market(s)	<ul style="list-style-type: none"> Retail 	Date proposal sent to AEMO	Tuesday, 18 April 2017
Short Issue Title	Minor changes to the Retail Market Procedures (RMP) and Technical Protocols (TP) to progress industry's broader program of work to harmonise the various jurisdictional retail documentation wherever possible.		
Other key contact information			

VERSION #	PRESENTED TO	DATE
Eg. 1.0	GRCF	20 January 2021



PROPOSED PROCEDURE CHANGE (PPC)

1. DESCRIPTION OF ISSUE

The changes proposed in this Proposed Procedure Change (PPC) mostly involve minor rewording of some existing clauses within the Retail Market Procedures (RMP) so that they align with other east coast jurisdictions. It is AEMO's view that none of these changes significantly alter any of the existing obligations placed on participants. Some participants may need to make minor process changes.

These changes contribute to AEMO's and industry's long-term aim to increase consistency between the regulatory frameworks and create efficiency for those participants operating in multiple east coast gas retail markets.

The following is a list of 15 existing initiatives that shape the scope of works for this consultation.

- IN002/18 - Add a provision that describes that AEMO can lodge a transfer on behalf of a Self Contracting Users (SCU) as per SA RMP. This was raised by AEMO as part of SA RMP harmonisation (IN006/17).
- IN004/17 - Add a downgrade process to the RMPs. This was raised by AGL as part of minor changes to the gas RMP to support to harmonisation (IN027/14).
- IN004/19 - The NSW/ACT RMP should be updated to reference number of hours "from the start of the gas day" like the other jurisdictions. This was raised by AGL as part of the gas day harmonisation consultation (IN002/16).
- IN005/19 - Remove redundant transitional provision in Chapter 12A. This was raised by AGL as part of the gas day harmonisation consultation (IN002/16).
- IN005/20 - Review of RMPs address based identifiers process to determine if the WA change needs to be applied to other jurisdictions. This was raised by AGL and OE as part of adding an address attribute change process in WA (IN003/18).
- IN007/19 – NSW/ACT RMP Clause 7.2.1 does not have a clear time for the cancelled or accelerated transfer actions to occur whereas the other jurisdictions do. This was raised by AGL as part of the gas day harmonisation consultation (IN002/16).
- IN008/18 - All jurisdiction RMPs state that AEMO can submit a Meter Installation Registration Number (MIRN) discovery request however the method and format isn't specified in any Technical Protocol (TP). This was raised by AEMO.
- IN009/15 - Include defined terms for National Energy Retail Law (NERL) if they are mentioned in RMPs. This was raised by AGL as part of New South Wales / Australian Capital Territory Retail Gas Project (NARGP).
- IN009/17 and IN015/15 - Add a clause 4.2A (Re-energisation of Distribution Supply Points) to align with Qld and Vic. See Qld clause 2.9.5A. This was raised by Red/Lumo as part of minor changes to the gas RMP to support harmonisation (IN027/14).
- IN009/20 - Appendix D (The Low Volume Interface) of the FRC B2M-B2B Hub System Specifications need to be amended to say, "WA only". This was raised by AEMO.
- IN010/15 - Recommend removal of the word 'calendar' before 'day' as it causes confusion about the definition of 'day' which is currently undefined. This was raised by Red/Lumo and Energy Australia as part of NARGP.
- IN013/15 - AEMO introduced the defined term "Prospective FRO (Financially Responsible Organisation)" in NSW/ACT. This is a term not used in other jurisdictions. For consistency AEMO



proposed to also add this definition in VIC and QLD. This was raised by Red/Lumo and Energy Australia as part of NARGP.

- IN016/20 - The old version of the SA RMP clauses 220(2), 221, 222 and 223(1) contained formulas however these formulas haven't been included clauses 8.6.2(b), 8.6.3, 8.6.4 and 8.6.5(a). This was raised by AEMO.
- IN003/21 – Further minor changes identified during the pre-consultation stage for IN004/17. These minor changes and involve harmonising the following definitions: Discovery Address; MIRN; MIRN Discovery; MIRN Discovery Response; and Pressure Correction Factor. Further changes includes deleting the transitional provisions for gas day harmonisation and including a sentence that explains when a version of the RMP is applicable.

Anyone wishing to make a submission for this first stage consultation stage are requested to use the response template provided in Attachment A. Submissions close Monday 8 February 2021 and should be e-mailed to grcf@aemo.com.au.

IMPORTANT: The scope of works is limited to the 15 initiatives described above. The scope does not include WA. The scope maybe expanded to pick up other minor typographical errors that are identified. A holistic review of all clauses for every jurisdiction's RMP is out of scope for this consultation.

2. REFERENCE DOCUMENTATION

Attachment A is combined information / participant response template. For each of the initiatives described in section 1 of this PPC, the following information is provided in Attachment A:

- Issue number and a brief description of the proposed change and if applicable, includes the participant organisation that raised this proposal and the originating consultation that identified the issue.
- If applicable, the specific jurisdiction's RMP that AEMO used as baseline to prepare the proposed changes to harmonise with the other jurisdictions. This also includes a reference to the clause / section number.
- A list of which RMPs or TPs that have been amended. This also includes a reference to the clause / section number.
- For each RMP or TP that are proposed to be amended, a participant response / comment section is included. This section is shaded in **yellow**. Participants are requested to provide their feedback on each of the proposed changes in this section.
- The feedback AEMO received from participants during the Gas Market Issue (GMI) consultation stage. This also includes AEMO responses to any feedback that was received. This section is shaded in **Blue**.
- If applicable, a background section has been included containing information on the originating consultation.
- At the end of Attachment A, there is a general comments section for any additional feedback.

Attachment B contains track-changed for each of the identified RMPs and TPs, which detail all changes (editorial and otherwise). A comment to indicate which Issue Number (IN) the changes pertain to is also provided. The following documents are included in this attachment:

- Ref 1 - Retail Market Procedure (SA) version 18 (marked up)
- Ref 2 - Retail Market Procedure (NSW/ACT) version 26 (marked up)
- Ref 3 - Retail Market Procedure (QLD) version 20 (marked up)



- Ref 4 - Retail Market Procedure (VIC) version 16 (marked up)
- Ref 5 - Retail Market Procedure (WA) version 8¹
- Ref 6 - Participant Build Pack 1 - Table of Transactions version 3.6 (marked up)²
- Ref 7 - Participant Build Pack 1 - CSV Data Format Specifications version 3.4 (marked up)
- Ref 8 - Participant Build Pack 5 - NSW-ACT version 6 (marked up)²
- Ref 9 - Participant Build Pack 6 - NSW-ACT ver 4.0 - (marked up)²
- Ref 10 - FRC B2B System Interface Definitions v4.8 (marked up)²
- Ref 11 - Specification Pack - FRC B2M-B2B Hub System Specifications version 3.9 (marked up)

3. OVERVIEW OF CHANGES

At the Gas Retail Consultative Forum (GRCF) prioritisation session held in September 2019, participants supported AEMO's proposal to collate several minor amendments to the east coast RMPs and TPs into a single consultation. This single consultation initiative (IN004/17) was added to the GRCF 2020 work program. In mid-November 2020, AEMO issued a Gas Market Initiative (GMI) that invited participants to provide feedback by mid-December 2020. A summary of the feedback is noted below.

As outlined in Section 1, this PPC is made up of several existing initiatives, each having their own specific change as described in Attachment A. The changes are mostly minor rewording of some existing clauses so that they use language/terms consistent with that used in other east coast RMPs. It is AEMO's view that none of these changes significantly alter any of the existing obligations placed on participants. Some participants may need to make minor process changes.

It is envisaged that the above should contribute to AEMO's and industry's long-term aim to increase consistency between the regulatory frameworks for all east coast retail gas markets. AEMO is targeting to have the formal consultation processes concluded in early 2021 with the proposed amendments to come into effect May 2021.

GRCF feedback on the GMI was supportive. Multinet, AGL, Red/Lumo, Origin Energy, AGN and Alinta provided feedback. Multinet, AGL, and AGN's feedback contained additional suggestions to further improve the redrafting of specific clauses and in one instance the participant expressed a view that the timing provision was problematic. See Attachment A for further information on the feedback received and AEMO's response to any specific issues or suggestions that were raised.

4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

Since all changes with a material impact on the market or IT system have been excluded from this consultation, there should be minimal implementation requirements for participants or AEMO as a result of this consultation. Some participants may need to make minor process changes.

5. IMPACT OF ISSUE NOT PROCEEDING

If the changes identified in this PPC do not proceed, then process improvements to harmonise the east coast RMP will not be attained, and as such, the benefit of clearer and more streamlined procedures will not be realised.

¹ This is a reference only. There are no changes proposed in the RMPs for WA.

² These documents do not include the changes that are part of the Q4 2021 bundled release program of work



6. OVERALL COST, BENEFITS AND MAGNITUDE OF THE CHANGES

AEMO expects there will be negligible implementation costs since none of the changes proposed in this PPC require system changes or substantial process changes and considers this change to be non-controversial. If a participant believes that any of the proposed changes are controversial, this feedback needs to be included in the Attachment A response template.

The benefits are intangible in nature and are likely to be realised as follows:

- increased consistency within the retail gas regulatory framework;
- more uniform RMP across all jurisdictions will reduce the complexities normally associated with entering gas retail markets, particularly for those retailers wanting to operate in more than one jurisdiction; and
- increased readability of the RMPs.

7. CONSISTENCY WITH NATION GAS RULES (NGR) AND NATIONAL GAS OBJECTIVE (NGO)

Consistency with National Gas Law (NGL) and NGR	<p>AEMO’s view is that the proposed change is consistent with the NGL and NGR because the proposed change promotes consistency across the four east coast jurisdictions.</p> <p>No participant raised any objections during the pre-consultation process to the proposal’s consistency with any of these documents.</p>
National Gas Objective	<p>As outlined in Section 6, it is AEMO's view that this change removes any costs associated with unnecessary differences in process and procedures and is in the long-term interests of consumers as it promotes clarity and consistency for gas retail market participants.</p>
Any applicable access arrangements	<p>AEMO’s view is that the proposed change is not in conflict with existing Access Arrangements.</p> <p>No participant raised any objections during the pre-consultation regarding the proposal’s consistency with any existing Access Arrangements.</p>

8. SUPPORTING DOCUMENTATION

See Attachments A and B.

9. PROPOSED TIMELINES

Subject to all necessary approval's AEMO is targeting to implement this change in early May 2021.

In order to achieve this timeline, AEMO proposes the following key milestones:

- Issue PPC on 20 January 2021
- Submission on PPC close 8 February 2021
- Issue Impact and Implementation Report (IIR) on 26 February 2021
- Submission on IIR close 29 March 2021
- Issue AEMO decision 6 April 2021



ATTACHMENT A - INFORMATION / PARTICIPANT RESPONSE TEMPLATE

A response template has been attached separately to this document. This template also included feedback received during the pre-consultation stage. Anyone wishing to make a submission to this first stage consultation are to use this response template. Submissions close Monday 8 February 2021 and should be emailed to grcf@aemo.com.au.

ATTACHMENT B - DOCUMENTATION CHANGES

Draft versions of the RMPs and TPs showing tracked changes between the current version and the proposed changes are attached separately to this document. Blue underline means addition and ~~red strikethrough~~ means delete.