

# PROPOSED PROCEDURE CHANGE (PPC)

<b>Issue Number</b>	Package 1 - 2023 (IN008/19, IN011/15, IN011/22, IN006/22, IN008/22)		
<b>Impacted Jurisdiction(s)</b>	Victoria, Queensland, SA and NSW/ACT		
<b>Proponent</b>	See table in section 3.1	<b>Company</b>	
<b>Proponent e-mail</b>	<a href="mailto:grcf@aemo.com.au">grcf@aemo.com.au</a>	<b>Proponent phone #</b>	
<b>Affected Gas Market(s)</b>	• Retail	<b>Date proposal sent to AEMO</b>	Tuesday, 1 November 2022
<b>Short Issue Title</b>	Minor changes to the Retail Market Procedures (RMP) to introduce flexibility regarding the timing of Customer Own Reads (COR). This PPC also includes other non-controversial initiatives that involve aligning documentation with existing operational processes, remove redundant processes and progress industry’s broader program of work to harmonise the various jurisdictional retail documentation.		

VERSION #	PRESENTED TO	DATE
1	GRCF	23 November 2022



## PROPOSED PROCEDURE CHANGE (PPC) – DETAILED REPORT SECTION

### 1. DESCRIPTION OF ISSUE

The RMPs are currently restrictive with regards to the timing of the provision of Meter Reading Information when provided via a Customer Own Read (COR). IN008/19 intends to address this by allowing retailers and network operators to agree on a time and frequency by which to provide this information. This is driven by an increase in the availability of mechanisms for customers to provide their own meter reading.

In relation to the other initiatives<sup>1</sup> contained in this PPC, AEMO has identified certain RMP provisions that are not properly aligned with operational processes, or the process has become redundant, yet the RMP provisions still mentions this misaligned or redundant process. There is also one initiative whereby a participant has identified that some definitions are inconsistent between each RMPs, with no basis for this.

Section 3 of this PPC contains further information about each of the above issues and a brief explanation of the specific changes. Attachment A of this PPC contains amendments for each of the proposed changes.

#### 1.1. Pre-consultation outcomes

At the Gas Retail Consultative Forum (GRCF) prioritisation session held in September 2019, participants supported AEMO's proposal to add initiative IN008/19 RMP change for Customer Own Read (COR) to a consultation package. This GMI proposes to allow information to be shared by parties at an agreed frequency and was added to the GRCF 2020 work program. In October 2022, a Gas Market Issue (GMI) that provided details about this issue including drafting changes to the RMPs was tabled at the GRCF meeting. No participant opposed the proposed drafting, therefore, AEMO decided to progress this change to the formal consultation stage (PPC). Following the October 2022 GRCF meeting, AEMO decided to include a few miscellaneous non-controversial or compliance resolution changes to this PPC because, like IN008/19, they include changes to east coast RMPs.

#### 1.2. Invitation to provide feedback. Scope of changes.

Anyone wishing to make a submission for this first stage consultation stage are requested to use the response template provided in Attachment B. Submissions close COB 14 December 2022 and should be e-mailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

IMPORTANT: The scope of works is limited to the initiatives described above. The scope does not include WA. The scope maybe expanded to pick up other minor typographical errors that are identified. A more thorough review of the other clauses of the RMPs is out of scope for this consultation.

### 2. REFERENCE DOCUMENTATION

- [Retail Market Procedures \(VIC\) 16.0](#)
- [Retail Market Procedures \(QLD\) 20.0](#)
- [Retail Market Procedures \(NSW-ACT\) 28.0](#)
- [Retail Market Procedures \(SA\) 19.1](#)
- [Register of Weather-Related Information 3.0](#)

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<sup>1</sup> See the table in section 3.1 of this PPC excluding IN008/19.



### 3. OVERVIEW OF CHANGES

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 and compliance-related updates to drafting. It is AEMO’s view that none of these changes significantly alter any of the existing obligations placed on participants. 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 2023 with the proposed amendments to come into effect 31 March 2023 should they be approved by AEMO.

#### 3.1. Proposed changes

The following table indicates which initiative affect which Procedures. The clauses of each document that have been updated have had a colour-coded comment applied to them indicating which initiative is related to which change of drafting.

Change ID	Title	Proponent	Documents affected
IN008/19	Customer Own Reads (COR) Amend RMPs to have alternate timeline	AGL	NSW/ACT RMP SA RMP VIC RMP QLD RMP
IN006/22	Redundant provisions removed from QLD RMP	AEMO	QLD RMP
IN011/22	Compliance resolution. Remove Clause 3.3.2(d) that required AEMO to provide a report to all participants, shippers and transmission pipeline operators	AEMO	SA RMP
IN008/22	Compliance resolution. Update the Register of Weather Related Information to accommodate third party vendors Compliance Resolution	AEMO	Register of Weather Related Information NSW/ACT RMP
IN011/15	Harmonise the definition of Actual Metering with NSW/ACT and SA	Red/Lumo	VIC RMP QLD RMP

The proposed changes are:

COR Amend RMPs to have alternate timeline (IN008/19).

- Adds a new provision to existing RMO timing provision that enables parties to agree such timings.

Harmonise the definition of Actual Metering with NSW/ACT and SA (IN011/15).

- Redefines ‘actual meter reading’ for Victoria RMP, Queensland RMPs to harmonise them.

Redundant provisions removed from QLD RMP (IN006/22).

- Removes reference to ‘sufficient financial standing’ and clause 1.2 ‘Registration with AEMO’ in the Queensland RMP.

Clause 3.3.2(d) Review Compliance Resolution (IN011/22).

- Removes clause 3.3.2 (d) from the SA RMP. The clause required AEMO to provide a report to all participants, shippers and transmission pipeline operators stating the number of days in the month in which estimated gate point metering data was provided under paragraph 3.3.2 (c). This report is not needed by the market.



Update the Register of Weather Related Information to accommodate third party service providers Compliance Resolution (IN008/22). This is a compliance-related matter that ensures the RMP and Guide reflect AEMO's business practices.

- Amended Appendix 2.3 of the NSW RMP to reflect the fact that when there is no physical sensor to obtain sunshine hour values, these are derived from meter and synoptic data based on cloud cover at the specified weather stations(s) for NSW in much the same way as is currently done for the ACT.
- Added a footnote to Section 6 - NSW and ACT Weather Related Information of the Register of Weather Related Information<sup>2</sup> highlighting the fact that AEMO uses a third-party service provider for its weather data, but this data is originally sourced from the Bureau of Meteorology.

See Attachment A for further information about these changes.

#### **4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS**

Inclusion of the proposed Procedure changes will improve compliance and consistency across jurisdictions. This reduction of administrative burdens will allow participants to operate in an effective and efficient manner, which meets the Objectives of the NERR and NGR.

Not making the amendments to the various RMPs is likely to leave participants open to administrative non-compliances in this matter or force excessive data provisions which neither party needs nor wants.

Since all changes with a material impact on AEMO's market or IT systems have been excluded from this consultation, there should be minimal implementation requirements for participants or AEMO as a result of this consultation.

#### **5. IMPACT OF ISSUE NOT PROCEEDING**

Unnecessary processing and delivery of information may be required if procedure changes are not made, or time and energy would be wasted due to management of administrative non-compliances. 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.

#### **6. OVERALL COSTS, 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 noncontroversial. If a participant believes that any of the proposed changes are controversial, this feedback needs to be included in the Attachment B 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.
- Increased readability of the RMPs.

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<sup>2</sup> Register of Weather Related Information is a guide that has its own change process for amendment and is therefore not part of the consultation process described in Part 15B of the National Gas Rules. It is included in this consultation for context.



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

Regarding these changes, AEMO’s preliminary assessment of the proposal’s consistency with the NGR and NGO is:

Consistency with National Gas Law (NGL) and NGR	AEMO’s view is that the proposed change is consistent with the NGL and NGR because the proposed changes properly reflects operational practices and promotes consistency across the four east coast jurisdictions.
National Gas Objective	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.
Any applicable access arrangements	AEMO’s view is that the proposed change is not in conflict with existing Access Arrangements.

If any participant believes that any of the above AEMO views are contentious, this feedback needs to be included in the Attachment B response template.

## 8. SUPPORTING DOCUMENTATION

Attachment A Proposed Changes to Procedures

Attachment B PPC Response Template.

## 9. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO is targeting to implement this change on 31 March 2023.

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

- Issue PPC on 23 November 2022
- Submissions on PPC close 14 December 2022
- Issue Impact and Implementation Report (IIR) on 19 January 2023
- Submission on IIR close 17 February 2023
- Issue AEMO decision 9 March 2023



## ATTACHMENT A – MARKED UP CHANGES (SEE SECTION 3)

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

- Vic RMP.
- SA RMP.
- NSW/ACT RMP<sup>3</sup>.
- QLD RMP.
- Register of Weather Related Information.

## ATTACHMENT B – PPC RESPONSE TEMPLATE

The PPC 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 proposal in Sections 1–9 (i.e., whether AEMO has correctly captured the requirements and surrounding context of the proposal)
- Section 2 seeks feedback on the proposed changes listed in attachment A.

Anyone wishing to make a submission to this PPC consultation are to use this response template. Submissions close COB 14 December 2022 and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

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<sup>3</sup> The NSW/ACT RMP show the mark-ups that relate to the IN011/21 (BL and TSF changes) consultation. These mark-ups are not part of the Package 1 (2023) consultations. A decision on these changes was published on 11/02/22. For further information, see the consultation page [here](#).