PROPOSED PROCEDURE CHANGE (PPC)

Issue Number	IN002/21		
Impacted Jurisdiction(s)	SA and WW&T		
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Affected Gas Market(s)	• Retail	**Date proposal sent to AEMO**	Thursday, 15 July 2021
Short Issue Title	Earliest transfer day change for South Australia		
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VERSION #	PRESENTED TO	DATE
1.0	GRCF	8 March 2022

PROPOSED PROCEDURE CHANGE (PPC) – DETAILED REPORT SECTION

1.   DESCRIPTION OF ISSUE

In the Wagga Wagga and Tamworth (WW&T) and South Australian (SA) gas retail markets, the reading used to perform in-situ transfers for basic-metered delivery points is generally the next scheduled meter reading (i.e., the reading taken as part of the normal quarterly reading cycle is used, instead of arranging for a special meter reading). As per clause 6.2.1 of the Retail Market Procedures (SA), once a transfer request is submitted, it will take effect on the first scheduled meter reading that is on or after the proposed transfer date. Hence, if the proposed transfer date were, for example, 1 April, and the scheduled meter reading occurred on 2 April, then the transfer would take effect on 2 April.

Meter readers use a "best endeavours" approach to undertaking meter read, which can result in a read being undertaken a day or two earlier than the scheduled meter reading date. However, due to the way that clause 6.2.1 (Transfer Request) of the RMP SA is drafted, if the meter reader takes an early meter reading (e.g., in the above example, if the meter reader took a reading on 30 March), the transfer request cannot complete, since the scheduled meter reading is not "on or after" the proposed transfer date. This creates a need for the Network Operator to pursue manual work-around processes (i.e., generating another read with the same index but at a later date so that the transfer can proceed).

In Victoria[1] and Queensland, unlike in South Australia, the period in which meter data may be provided for in-situ transfers begins four business days before the proposed transfer date. For example, if the earliest transfer date were 1 April and the meter reader took an early meter reading on 30 March, then the transfer would be able to proceed on the 30 March reading. This arrangement has been successfully deployed in these jurisdictions for several years.

1.1.   Proposed changes

Australian Gas Networks (AGN) proposes to align the WW&T and SA gas retail markets with existing practice in VIC and QLD by enabling in-situ transfers to occur so long as the read is at most four business days in advance of the proposed transfer date. This involves some minor changes to Chapter 6, which governs the customer transfer process, as well as to several definitions.

Additionally, the RMP (SA) currently refer to the "proposed transfer date" as the "earliest transfer day", since in SA the transfer can currently only occur on or after the proposed transfer date. Since the proposed changes would enable transfers in advance of the "earliest transfer day", it is required to amend all instances of "earliest transfer day" to be "proposed transfer date". AEMO has employed the definition of "proposed transfer date" as given in the RMP (VIC) in its proposed drafting of the new definition.

For the specific proposed RMP changes, please see Attachment A.

1.2.   Pre-consultation outcomes

AGL and Origin Energy submitted feedback to the GMI. Both participants supported the initiative and raised some minor amendments to the RMP changes. AEMO has responded to these in Attachment C.

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[1] By contrast to the RMP (SA), the RMP (VIC) do not employ the concept of an "earliest transfer date" but instead define the "proposed transfer date" (which, "in relation to a transfer request, means the day nominated in that transfer request as the day with effect from which the Market Participant who delivers the transfer request to AEMO is to be registered in the metering register as the FRO for the supply point to which the transfer request relates"). The RMP (VIC) then define the "allowable period" to mean either "(a) in relation to a transfer request lodged without a customer no-change statement, the period commencing on the 10th business day prior to the proposed transfer date and expiring on the fourth business day after the proposed transfer date; or (b) in relation to a transfer request lodged with a customer no-change statement, the period commencing on the fourth business day prior to the proposed transfer date and expiring on the fourth business day after the proposed transfer date".

1.3. Invitation to provide feedback.

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 30 March 2022 and should be e-mailed to grcf@aemo.com.au.

2. REFERENCE DOCUMENTATION

- Retail Market Procedures (SA) version 18.0
- SA/WA Interface Control Document version 5.0[2]

3. OVERVIEW OF CHANGES

The proposed changes are:

- To amend "earliest transfer day" to "proposed transfer date" (adopting the VIC definition for this term).
- To amend "allowable period" to mean the period commencing on the fourth business day prior to the proposed transfer date and expiring 102 days after the lodgement of a transfer request.
- To amend clause 6.8.2(a)(ii) to allow the transfer day to be on, after, or up to four business days before the proposed transfer date.
- Any editorial amendments that follow from the above.

4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

Changes will be required to AEMO's validations on meter reads to enable them to look not only for meter reads which occur on or after the proposed transfer date but also up to four business days before the proposed transfer date. AEMO's total costs should be approximately $15,000.

No system impacts are expected to AGN's or Retailers' systems.

5. IMPACT OF ISSUE NOT PROCEEDING

If this initiative is not progressed, then in-situ transfers with an early transfer read will remain open, which will lead to customer dissatisfaction. Further, Retailer resources may continue to be used following up on incomplete transfers, and Network Operator resources will continue to be used in pursing manual work-around processes.

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

The change will mean that in-situ transfers with an early transfer read are completed on-time, which will improve customers' experience and reduce the need for manual work-around processes by the Network Operator. Currently there are around 2,000 transfers per year impacted by this problem in SA and WW&T.

It will also align SA's processes for customer transfers with those of other east-coast jurisdictions and will therefore facilitate harmonisation between markets. As such, it is expected that the change will facilitate competition by reducing barriers to entry for the SA gas retail market, will increase operational efficiency by enabling the standardisation of business processes across east-coast jurisdictions.

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[2] This reference has been included for context only. No changes are proposed. Section 8.1.3 (CATSChangeRequest Transaction) list the fields contained in a transfer request. Click here to view the ICD.

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

Regarding the changes in east-coast jurisdictions, 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. AEMO also believes that this change is consistent with the National Energy Retail Rules (NERR). Participants will be given an opportunity during this PPC consultation to inform AEMO if they believe there is such an inconsistency.
National Gas Objective	As outlined in Section 6, AEMO's view is that the propose change will help achieve the National Gas Objective through two mechanisms: 1. Improve customers' experience; and 2. Introduce improved processes by reducing manual work-arounds.
Any applicable access arrangements	AEMO's view is that the proposed change is not in conflict with existing Access Arrangements. Participants will be given an opportunity during this PPC consultation to inform AEMO if they believe the proposed change is in conflict with existing Access Arrangements.

8. SUPPORTING DOCUMENTATION

Attachment A   Proposed Changes to RMP SA

Attachment B   PPC Response Template

9. PROPOSED TIMELINES

- Issue PPC on Tuesday 8 March 2022.
- PPC consultation closes on Wednesday 30 March 2022.
- Issue IIR on Friday 8 April 2022.
- IIR consultation closes on Wednesday 11 May 2022.
- Notice of AEMO Decision issued on Friday 27 May 2022.
- Effective date Monday 4 July 2022.

ATTACHMENT A – DOCUMENTATION CHANGES – SA RMP

1.2 Definitions and Interpretation

1.2.1 Definitions

The words and phrases set out below have the meanings set out opposite them when used in these Procedures. Defined terms are intended to be identified in these Procedures by italicising them, but failure to italicise a defined term does not affect its meaning unless otherwise indicated.

Blue underline means add and red strikeout means delete.

⋮

allowable period	In relation to a *transfer request,* the period commencing on the fourth *business day* prior to the *proposed transfer date* and expiring The period of 102 days after the lodgement of a *transfer request* under clause 6.1.4.

⋮

*proposed transfer date*earliest transfer day	In relation to a *transfer request,* means the day nominated in that *transfer request* as the day with effect from which the *User* who delivers the *transfer request* to AEMO is to be registered in AEMO's *metering register* as the *current User* for the supply point to which the *transfer request* relatesThe date specified in a *transfer request* as the earliest day on which the *transfer* may take place (for a *move in*, this would generally be the date the *Customer* is moving into the premises), subject to clause 6.2.3(a)(vii).

⋮

transfer time	The start of the *gas day*:
	(a) during which an *actual meter reading* for a *basic-metered delivery point* for which a transfer is *pending*, was undertaken; or
	(b) that an incoming *User* has specified as the *proposed transfer date*earliest transfer day for an *interval-metered delivery point*.

⋮

4.2.7 Re-energising delivery points

(a) A *Network Operator*:

⋮

(iii) must (subject to law), in response to a deemed request under clause 6.2.2(a), if a *transfer* has been marked as *pending* by *AEMO* under clause 6.6 for a *de-energised delivery point*, re-energise the *delivery point* either:

(A) on the *proposed transfer date*earliest transfer day nominated in the *transfer request* for the *delivery point*, if the *Network Operator* receives notification under clause 6.6(b)(iv) that the *transfer* has been marked as *pending* at least 2 *business days* before the *proposed transfer date*earliest transfer day; or

⋮

6.2 The Transfer Request

6.2.1 Transfer request

(a) A *transfer request* must specify at least the following information:

    (i) the *MIRN*;

    (ii) the *proposed transfer date~~earliest transfer day~~*; and

        Note: Unless a *special meter reading* is requested, the *transfer* of a *basic-metered delivery point* will take effect at the time of the next *scheduled meter reading* which occurs on, ~~or~~ after, or up to four business days before the *proposed transfer date~~earliest transfer day~~*, provided a *validated actual meter reading* is generated at that time.

        Note: Under clause 6.2.3(a)(i), an *proposed transfer date~~earliest transfer day~~* must be no earlier than 5 *business days* after the date on which the *transfer request* is lodged (except where it is for a *move in*) and within the *allowable period*.

        Note: For a *move in*, the *transfer* will take effect on the *move in* date or if there is no *deemed meter reading* or a *special meter reading* cannot be obtained on the *move in* date, it will take effect at the time a *special meter reading* is obtained under clause 6.5.2.

    (iii) whether the requested *transfer* is a *move in*.

(b) By lodging a *transfer request* that is specified to be a *move in*, an *incoming User* represents to *AEMO* that the *transfer request* relates to a *move in*.

(c) An *incoming User* is taken to make the representation in paragraph (b) at the time of lodging the *transfer request* for a *move in* and on each day that the request is *open*.

(d) A *Self Contracting User* may request *AEMO* to:

    (i) lodge a *transfer request* on its behalf in order for the *Self Contracting User* to *transfer* to itself; and

    (ii) accept notices that are required to be in aseXML format under these Procedures on behalf of the *Self Contracting User* in relation to the *transfer request* referred to in sub-paragraph (i).

(e) Upon receiving a request under paragraph (d), *AEMO* must lodge a *transfer request* and accept notices in aseXML format on behalf of a *Self Contracting User* on such terms and conditions as *AEMO* determines.

6.2.2 Transfer request deemed to be a request for certain purposes

By lodging a *transfer request*, the *incoming User* is deemed to have requested the *Network Operator*, as part of the *transfer* process:

(a) if a *basic-metered delivery point* is de-energised — to re-energise it; and

(b) if the *transfer request* is *cancelled* after a *re-energisation* has occurred under clause 4.2.7(a)(iii) — to *de-energise* it again; and

(c) if the *transfer request* is for a *move in* at a *basic-metered delivery point* — to undertake a *special meter reading* under clause 6.5.2(a).

6.2.3 Requirements for transfer request

(a) A *transfer request* is valid only if:

(i)   the *delivery point* exists within *AEMO's metering database*;

(ii)   the *MIRN status* is *energised* or *de-energised*;

(iii)   there is not, in relation to the *delivery point*, an *open transfer request*;

(iv)   there is not, in relation to the *delivery point*, an *open error correction transaction*;

(v)   the *incoming User* is registered as a *User* and has a contract with a *shipper* for the haulage of *gas* to that *delivery point*;

(vi)   if it is for a *move in* — the *delivery point* is *basic-metered*; and

(vii)   the *proposed transfer date**earliest transfer day* is within the *allowable period* and occurs:

    (A)   if the *transfer request* is not for a *move in* — no earlier than 5 *business days* after the date on which the *transfer request* is lodged; and

    (B)   if the *transfer request* is for a *move in* — no earlier than the date on which the *transfer request* is lodged and the start of the *allowable period* is no earlier than the lodgement date.

(b)   Upon receipt of a *transfer request* which is not valid, *AEMO* must reject the *transfer request* and notify the *incoming User* that the *transfer request* has been rejected, specifying the reason why the *transfer request* is not valid.

6.2.4   Response to valid transfer request

(a)   Upon receipt of a valid *transfer request*, *AEMO* must accept the *transfer request* and:

(i)   notify the *incoming User* that the *transfer request* has been accepted, specifying at least the following details:

    (A)   the unique identifier assigned by *AEMO* to the *transfer request*; and

    (B)   the process time of the *transfer request*;

(ii)   notify the *Network Operator* that the *transfer request* has been accepted, specifying at least the following details:

    (A)   the *MIRN*; and

    (B)   the *incoming User*; and

    (C)   the *proposed transfer date**earliest transfer day*; and

    (D)   whether the *transfer request* is for a *move in*; and

    (E)   the process time of the *transfer request*; and

    (F)   the unique identifier assigned by *AEMO* to the *transfer request*;

(iii)   notify the *current User* that the *transfer request* has been accepted, specifying at least the following details:

    (A)   the *MIRN*; and

    (B)   the *proposed transfer date**earliest transfer day*; and

    (C)   whether the *transfer request* is for a *move in*; and

    (D)   the process time of the *transfer request*; and

    (E)   the unique identifier assigned by *AEMO* to the *transfer request*; and

(iv)   if the *transfer request* is not for a *move in*, suspend the *transfer request* until lapse of the *transfer objection resolution period*.

(b)   In normal circumstances *AEMO* will not notify the *current User* of the identity of an *incoming User*, however *AEMO* may do so where it judges, in its absolute discretion, that it is necessary to do so for the purpose of resolving any issue or dispute.

(c)   *AEMO* may also, in its absolute discretion, for the purpose of resolving any issue or dispute in relation to the *transfer request*, provide the *incoming User* with any information *AEMO* receives in writing from the *current User* in relation to the *transfer request*.

(d)   For the purposes of paragraph (c), *AEMO* must provide the *incoming User* with the information *AEMO* receives, in the same format as *AEMO* received the information from the *current User*, provided that it is a format contemplated by these Procedures or the *AEMO Specification Pack*.

6.3   Objection to Transfer (Other than a Move In)

Note: The next step for a *transfer* that is a *move in* appears at clause 6.4.1.

6.3.1   Network Operator may object to transfer other than a move in

(a)   Before the expiry of 2 *business days* after the *process time* notified under clause 6.2.4(a)(iii), if the *transfer request* is not for a *move in*, a *Network Operator* may lodge a *transfer objection* with *AEMO* on the ground that the *incoming User* has not entered into a *haulage contract* in respect of the *delivery point* and its *meter* with the *Network Operator*.

(b)   A *transfer objection* under paragraph (a) must correspond to an *open transfer request*.

(c)   Upon receipt of a *transfer objection* which is not valid, *AEMO* must reject the *transfer objection* and notify the *Participant* that lodged the *transfer objection*, specifying the reason why the *transfer objection* is not valid.

6.3.2   Response to valid transfer objection

Upon receipt of a valid *transfer objection*, *AEMO* must accept the *transfer objection* and notify the *incoming User* and the *Participant* that lodged the *transfer objection* that the *transfer objection* has been accepted, specifying at least:

(a)   details of the *transfer request* to which the *transfer objection* relates; and

(b)   the process time of the *transfer objection*.

6.3.3   Withdrawal of transfer objection

(a)   Before the expiry of 3 *business days* after the *process time* notified under clause 6.3.2, a *Participant* that lodged a *transfer objection* may lodge a *transfer objection withdrawal notice* with *AEMO*.

(b)   A *transfer objection withdrawal notice* lodged by a *Participant* must correspond to the *open transfer objection* previously lodged by that *Participant*.

(c)   Upon receipt of a *transfer objection withdrawal notice* which is not valid, *AEMO* must reject the *transfer objection withdrawal notice* and notify the *Participant* that lodged the *transfer objection withdrawal notice*, specifying the reason why the *transfer objection withdrawal notice* is not valid.

6.3.4   Response to valid transfer objection withdrawal notice

Upon receipt of a *valid transfer objection withdrawal notice, AEMO* must accept the *transfer objection withdrawal notice* and:

(a)   *cancel* the *transfer objection*; and

(b)   notify the *incoming User* and the *Participant* that lodged the *transfer objection withdrawal notice*, specifying the details of the *transfer objection* to which the *transfer objection withdrawal notice* relates.

6.3.5   If transfer objection not withdrawn

If *AEMO*

(a)   receives a valid *transfer objection*; and

(b)   does not receive a valid *transfer objection withdrawal notice* within the time period specified under clause 6.3.3(a),

then *AEMO* must:

(c)   before the start of the next *business day*, *cancel* the *transfer request*; and

(d)   notify the *incoming User*, the *current User* and the *Network Operator* that the *transfer request* has been *cancelled*.

> Note: An *incoming User* wishing to reinitiate a *transfer request* that has been *cancelled* must lodge a new *transfer request*.

6.4   Withdrawal of Transfer Request

6.4.1   Incoming User may withdraw transfer request

(a)   An *incoming User* may withdraw a *transfer request* for a *basic-metered delivery point* at any time before *AEMO* issues a *transfer confirmation* by lodging a *transfer withdrawal notice* with *AEMO*.

(b)   An *incoming User* may withdraw a *transfer request* for an *interval-metered delivery point* at any time up to two *business days* before the *proposed transfer date*~~earliest transfer day~~ specified in the *transfer request* by lodging *a transfer withdrawal notice* with *AEMO*.

(c)   A *transfer withdrawal notice* must correspond to an *open transfer request* previously lodged by the *incoming User*.

(d)   Upon receipt of a *transfer withdrawal notice* which is not valid, *AEMO* must reject the *transfer withdrawal notice* and notify the *Participant* that lodged the *transfer withdrawal notice*, specifying the reason why the *transfer withdrawal notice* is not valid.

6.4.2   Response to valid transfer withdrawal notice

Upon receipt of a valid *transfer withdrawal notice, AEMO* must accept the *transfer withdrawal notice* and:

(a)   *cancel* the *transfer request*; and

(b)   notify the *current User*, the *incoming User* and the *Network Operator*.

6.5 Move Ins Pending

6.5.1 Marking a move in as pending

If *AEMO* receives a valid *transfer request* for a *move in*, *AEMO* must:

(a) mark the *move in* as *pending*; and

(b) notify the *incoming User*, the *current User* and the Network Operator that the *move in* is pending.

6.5.2 Network Operator may be required to undertake special meter reading for a move in

(a) If a *transfer request* is for a *move in* and:

    (i) the *Network Operator* reasonably determines that there is no prospect of determining a *deemed meter reading* under clause 3.1.3, for the *proposed transfer date*~~earliest transfer day~~; and

        Note: The *Network Operator* may make this determination if it determines that there is unlikely to be a *validated scheduled meter reading* or *special meter reading* in the 10 days before the *move in*.

    (ii) no *scheduled meter reading* is scheduled for the *proposed transfer date*~~earliest transfer day~~; and

    (iii) no *special meter reading* has been requested (at least 2 *business days* prior to the *proposed transfer date*~~earliest transfer day~~) by the *User*, for the *proposed transfer date*~~earliest transfer day~~,

    then the *Network Operator* must undertake a *special meter reading*:

    (iv) on the *proposed transfer date*~~earliest transfer day~~; or

    (v) if the *proposed transfer date*~~earliest transfer day~~ is less than 2 *business days* after *AEMO* gives notice under clause 6.5.1(b) that the *transfer* is *pending* — within 2 *business days* after receipt of the notice.

(b) If a *transfer request* is for a *move in* and either:

    (i) a *scheduled meter reading* is scheduled for, or not more than 10 days before, the *proposed transfer date*~~earliest transfer day~~; or

    (ii) a *special meter reading* has been requested (at least 2 *business days* prior to the *proposed transfer date*~~earliest transfer day~~) for, or not more than 10 days before, the *proposed transfer date*~~earliest transfer day~~ by either the *current User* or the *incoming User*; or

    (iii) the *Network Operator* is required to undertake a *special meter reading* under paragraph (a)(iv) or (a)(v);

    and the *Network Operator* fails to obtain a *meter reading* under at least one of sub-paragraphs (i), (ii) or (iii), then the *Network Operator* must notify the *incoming User* of the failure by the end of the next *business day*.

(c) If, within 3 *business days* after notifying the *incoming User* under paragraph (b), the *Network Operator* receives a request from the *incoming User* to undertake a *special meter reading* for the *delivery point* the subject of the *transfer request*, the *Network Operator* must undertake a *special meter reading* as soon as practicable.

(d)　If *AEMO* does not receive an *actual meter reading* or a *substituted meter reading* within ~~7 business days~~ of the ~~the~~ *allowable period* for *proposed transfer date*~~earliest transfer day~~, then *AEMO* must:

　　(i)　*cancel* the *transfer request*; and

　　(ii)　notify the *incoming User*, the *current User* and the *Network Operator* that the *transfer request* has been *cancelled*.

6.6　Oher Transfers Pending

(a)　This clause 6.6 applies if *AEMO* receives a valid *transfer request* that is not for a *move in*.

(b)　If *AEMO*:

　　(i)　does not receive a valid *transfer objection*; or

　　(ii)　receives a valid transfer objection and also a valid transfer objection withdrawal notice,

then *AEMO* must upon the lapse of the *transfer objection resolution period*:

　　(iii)　mark the *transfer request* as *pending*; and

　　(iv)　notify the *incoming User*, the *current User* and the *Network Operator* that the *transfer request* is *pending*.

6.7　Actual Meter Reading for Transfer of Basic-Metered Delivery Points

(a)　If a *transfer request* for a *basic-metered delivery point* is *pending* and *AEMO* receives *metering data* under clause 3.6.1 based on an *estimated meter reading*, *AEMO* must within 24 hours notify the *incoming User* and *current User* that the *transfer* cannot take place until *AEMO* receives *metering data* based on a *validated actual meter reading* for the *delivery point*.

Note: The *Network Operator* may provide *AEMO* with *metering data* for an *actual meter reading* for the *delivery point* at any time. However, if that *meter reading* is taken after the *allowable period* has elapsed, *AEMO* will have already *cancelled* the *transfer request*.

(b)　If a *transfer request* for a *basic-metered delivery point* is pending and *AEMO* does not receive metering data based on an *actual meter reading* for the *delivery point* within the *allowable period*, then within 24 hours of the lapse of the *allowable period* *AEMO* must:

　　(i)　*cancel* the *transfer request*; and

　　(ii)　notify the *incoming User*, the *current User* and the *Network Operator* that the *transfer request* is *cancelled*.

Note: An *incoming User* wishing to reinitiate a *transfer request* that has been *cancelled* must lodge a new *transfer request*.

6.8　Transfer Takes Effect

6.8.1.　Requirements for a transfer confirmation

A *transfer confirmation* must specify at least the following information:

(a)　the *MIRN*;

(b)　the *transfer day*;

(c)   in the notice to the *Network Operator* and the *current User* for that *delivery point*, the identity of the *incoming User*; and

(d)   in the notice to the *incoming User* who delivered the *transfer request* to *AEMO* for that *delivery point*, the identity of the *current User*.

6.8.2.   The transfer

(a)   If a *transfer* is *pending* for a *basic-metered delivery point* and *AEMO* receives *metering data* based on an *actual meter reading* for the *delivery point*:

     (i)   within the *allowable period*; and

     (ii)   which would result in the *transfer day* being on, ~~or~~ after, or up to four *business days* before the *proposed transfer date*~~earliest transfer day~~,

then the *transfer* takes effect as from the *transfer time*, and *AEMO* must give a *transfer confirmation* to the *incoming User*, the *Network Operator* and the *current User* by:

     (iii)   if *AEMO* received the *metering data* before 5.00 pm on a day — before the start of the next *gas day*; and

     (iv)   otherwise — before the start of the second *gas day* after receipt of the *metering data*.

> Note: The *transfer day* is the *gas day* upon which the *actual meter reading* is obtained. The *incoming User* is responsible for all transportation and haulage charges to and all *gas* withdrawals from the *delivery point* from the beginning of the *transfer day*.

> Note: Upon accepting *metering data* under this clause, *AEMO* must update its *metering database*.

(b)   If a *transfer* is pending for an *interval-metered delivery point*, then the *transfer* takes effect as from the *transfer time*, and *AEMO* must give a *transfer confirmation* to the *incoming User*, the *Network Operator* and the *current User* after the transfer time.

(c)   Upon receipt of a *transfer confirmation*, the *Network Operator* must:

     (i)   with effect from the *transfer time*, record the *incoming User* in the *metering database* as the entity which is withdrawing *gas* at the *delivery point*; and

     (ii)   within 24 hours provide to the *incoming User*:

          (A)   the *MIRN standing data* and the *meter standing data*; and

          (B)   for a *basic-metered delivery point* only, the *index reading* from the *metering data AEMO* received for the *delivery point* under clause 3.6.1, as referred to in paragraph (a).

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 Section 3 and attachment A.

Anyone wishing to make a submission to this PPC consultation are to use this response template. Submissions close 23 March 2022 and should be emailed to grcf@aemo.com.au

ATTACHMENT C – FEEDBACK TO GMI

Section 1

Question	Ref #	Participant	Participant Response	AEMO Response (AEMO only)
1. Does your organisation support this initiative?	1	AGL	AGL supports both the specific initiative and the general harmonisation of the various retail gas procedures.	AEMO notes AGL's support for the initiative.
	2	Origin Energy	Yes	AEMO notes Origin Energy's support for the initiative.
2. Does your organisation expect any system impacts as a result of this initiative?	3	AGL	There should be no specific system changes.	AEMO notes that AGL does not expect there to be any system changes.
	4	Origin Energy	Not at this stage as per the initial assessment of proposal	AEMO notes that Origin Energy does not expect there to be any system changes.
3. Do the proposed RMP changes adequately address the requirements of the change?	5	Origin Energy	Yes, based on AEMO's alignment with Victoria	AEMO notes that Origin Energy believes the proposed RMP changes adequately address the requirements of the change.
4. Any other comments on this proposal?	6	AGL	See table below	AEMO has replied to AGL's comments below.

Section 2

Ref #	Participant	Clause #	Issue / Comment	Proposed text ~~Red strikeout~~ means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
7	AGN	Definition Allowable Period	In terms of the time period the original proposal that AGN discussed with AEMO didn't differentiate between types of transfer requests ("move-in" and not a "move in"). Introducing the Victorian "allowable period" definition means the time periods are now different AGN believes that the allowable period for move-ins should be the same as for in-situs, and therefore it should also commence 4 days prior to the proposed transfer date. Whilst move-ins generally transfer on a special read on the transfer date, this would cater for situations where occasionally special reads are done early.	*allowable period* ~~The period of~~ <u>In relation to a *transfer request,* the period commencing the fourth *business day* prior to the *proposed transfer date* and expiring</u> 102 days after the lodgement of a *transfer request* under clause 6.1.4.	AEMO supports AGN proposal to amend the allowable period definition and has made this change.
8	AGL	Definition Allowable Period	The reference to Cl 6.1.4 is unne3cessary as it is already referenced in the definition of transfer request. Delete unnecessary words.	Either: (a) <u>In relation to a *transfer request* that is for a *move in,* the period commencing on the 10th business day prior to the *proposed transfer date* and expiring 102 days after the lodgement of a *transfer request*</u> ~~under clause 6.1.4~~; or <u>(b) In relation to a *transfer request* that is not for a *move in,* the period commencing on the fourth *business day* prior to the *proposed transfer date* and expiring</u> ~~The period of~~ <u>102</u> days after the lodgement of a *transfer request* ~~under clause 6.1.4.~~	See ref#7

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9	AGL	Definition Earliest Transfer Day	Retain definition for future clauses but amend to fir in with new definition of allowable period.	**earliest transfer day** The ~~date specified in a transfer request as the~~ earliest day on which the transfer may take place ~~(for a move in, this would generally be the date the Customer is moving into the premises),~~ subject to clause 6.2.3(a)(vii).	See Ref #10.
10	AGL	4.2.7 (a)(iii)(A)	AGL suggests that the use of proposed transfer date for this clause means that the date nominated in the transfer request would be the energisation date, rather than the date the customer is actually transferred, if the customer transfer is undertaken earlier than the proposed transfer date, which is the aim of this proposal. By retaining an amended definition of earliest transfer date, this clause does not need to be amended.	(A) on the *proposed transfer date* ~~*earliest transfer day*~~ nominated in the *transfer request* for the *delivery point,* if the *Network Operator* receives notification under clause 6.6(b)(iv) that the *transfer* has been marked as *pending* at least 2 *business days* before the *proposed transfer date* ~~*earliest transfer day*~~; or ⋮ Retain as is: (A) on the *earliest transfer day* nominated in the *transfer request* for the *delivery point,* if the *Network Operator* receives notification under clause 6.6(b)(iv) that the *transfer* has been marked as *pending* at least 2 *business days* before *earliest transfer day*; or	AEMO does not believe that the additional complexity to the RMP of retaining "earliest transfer day" is warranted. AGIG has notified AEMO that there is no risk that the transfer would become effective before re-energisation, since AGIG re-energises the site on the effective date of the transfer, and since the RML read is the transfer read (and since the RML service order is automatically initiated upon receipt of a PEN notification), the date of the transfer read is the effective date of the transfer.

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11	AGL	6.2.1	AGL suggests that the description within this note indicates that the cyclic read will be scheduled based on the proposed transfer date, rather than a transfer occurring if the cyclic read occurs within the allowable period.	Note: Unless a *special meter reading* is requested, the *transfer* of a *basic-metered delivery point* will take effect at the time of the next *scheduled meter reading* which occurs on, or after, or up to four business days before the *proposed transfer date* ~~earliest transfer day~~, provided a *validated actual meter reading* is generated at that time. Suggest: Note: Unless a *special meter reading* is requested, the *transfer* of a *basic-metered delivery point* will take effect at the time of the next *scheduled meter reading* ~~which occurs on, or after, or up to four business days before the proposed transfer date earliest transfer day, provided a validated actual meter reading is generated at that time.~~ provided that 1. the scheduled meter reading is within the *allowable period* for the *proposed transfer date*; and 2. a *validated actual meter reading* is generated at that time.	AEMO does not support the proposed change. The clause as it stands reflects the wording in clause 6.8.2 (which is the binding clause from which the note derives its power), and so it is not desirable to have different wordings between the two.
12	AEMO	6.2.3 (a) (vii) (B)	Add further clarity to this clause	(vii) the *proposed transfer date* ~~earliest transfer day~~ is within the *allowable period* and occurs: (A) if the *transfer request* is not for a *move in* — no earlier than 5 *business days* after the date on which the *transfer request* is lodged; and (B) if the *transfer request* is for a *move in* — no earlier than the date on which the *transfer request* is lodged and the start of the *allowable period* is no earlier than the lodgement date.	AEMO has made this change.

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13	AGL	6.4.1	This clause allows a transfer to be withdrawn up to the proposed transfer date. However, under the newly defined allowable period the transfer may occur 10 days before the proposed transfer date. Will the withdrawal trigger a system generated error correction ?		AEMO notes that clause 6.4.1(b), which is the clause that AGL is referring to, only applies to interval-metered delivery points, which are not of concern for this consultation given that their metering data is collected daily as per clause 3.2. Clause 6.4.1(a), which concerns basic meters, only allows the withdrawal of a transfer request up to AEMO's issuing a transfer confirmation, not up to the proposed transfer date.
14	AGL	6.5.2(d)	Under the expanded allowable period a meter reading may have been lodged 10 days prior to the proposed transfer date. As such, clause (d) as it stands would require AEMO to cancel the transfer because a meter reading had not been submitted within the 7 business days this clause nominates. Suggest make the window the allowable period for the transfer date.	Suggest: (d) If *AEMO* does not receive or has not received an *actual meter reading* or a *substituted meter reading* within the *allowable period* for ~~7 business days~~ of the *proposed transfer date* ~~earliest transfer day~~, then *AEMO* must:	AEMO has made the proposed change.

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15	AGL	6.8.2	See note about 6.5.2(d), this clause needs to consider that AEMO may already have received the metering data; Also, the window for the meter reading varied between -10 and -4 depending on whether it is a move in or in-situ. Clause 6.8.2(ii) can be modified slightly using the amended definition of earliest transfer date	**6.8.2. The transfer** (a) If a *transfer* is *pending* for a *basic-metered delivery point* and *AEMO* receives or has received *metering data* based on an *actual meter reading* or a *substituted meter reading* for the *delivery point:* (i) within the *allowable period;* and (ii) which would result in the *transfer day* being on, or after, or up to four *business days* before *proposed transfer date* the *earliest transfer day*,	See Ref #10.