

PROPOSED PROCEDURE CHANGE (PPC)

Issue Number IN009-21, IN007-20, IN006-21, IN011-18 and IN010-22

Impacted Jurisdiction(s) SA, Vic, NSW/ACT and Qld.

Proponent **Company** AEMO

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Affected Gas Market(s) • Retail **Date proposal sent to AEMO** Monday, 12 April 2021

Short Issue Title Several minor documentation changes to the Technical Protocol (TP) that involve aligning documentation with existing operational processes, removing documentation duplication and minor rewording of some existing TP provision to harmonise with other jurisdictions.

Other key contact information

VERSION #	PRESENTED TO	DATE
1.0	GRCF	25 July 2022

PROPOSED PROCEDURE CHANGE (PPC)

1. DESCRIPTION OF ISSUE

The changes proposed in this PPC mostly involve aligning the documentation with existing operational processes. The changes involve minor rewording of some sections of the east coast Technical Protocols (TP) documents. Majority of the changes were raised during the implementation phase of the November 2021 Gas Retail Business-to-Business (B2B) system changes. There are also other changes, and these include removing documentation duplication and minor rewording of some existing provisions to harmonise with other jurisdictions. None of these changes alter any IT systems or any of the existing TP obligations placed on participants or AEMO.

Section 3 of this PPC contains a brief explanation of the specific changes. Attachment A of this PPC contains an extract of the TP showing the “marked up” amendments for each of the proposed 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 Thursday 11 August 2022 and should be e-mailed to grcf@aemo.com.au.

IMPORTANT: The scope of works is limited to the 5 initiatives described in section 3 of this PPC. The scope does not include WA. The scope may be expanded to pick up other minor typographical errors that are identified. A holistic review of all sections for every jurisdiction’s Technical Protocol (TP) is out of scope for this consultation.

2. REFERENCE DOCUMENTATION

- FRC B2B System Interface Definitions v4.9
- B2B Service Order Specification Part 1 v2.4
- B2B Service Order Specification Part 2 v3.4
- SA/WA Interface Control Document (ICD) v5.0
- Specification Pack Usage Guide v8.4
- Participant build pack 1 - Process flow table of transactions v3.8
- Participant build pack 1 - CSV format specifications v3.6
- Participant build pack 3 - B2B System Interface Definitions v3.8
- Participant build pack 5 - NSW-ACT v7.0
- Participant build pack 6 - NSW WW and T v5.0.

3. OVERVIEW OF CHANGES

At the Gas Retail Consultative Forum (GRCF) prioritisation session held in October 2021, participants supported AEMO’s proposal to collate several minor amendments to the east coast TPs into a single consultation. This single consultation initiative (IN009/21) was added to the GRCF 2022 work program.

The following is a brief explanation of each change, and the precise amendments are described in attachments A of this PPC.

- IN009/21 (Minor corrections following 29 November 2021 release). During the implementation phase of the gas retail business-to-business (B2B) system changes, several minor TP documentation errors were identified. In May 2021 a GRCF workshop was held whereby the GRCF compiled a list of



“workarounds” to some anomalies in the TP documents. A list of these documentation anomalies and the industry-agreed workarounds can be found [here](#). The document errors for items # 1, 2, 4, 5, 6, 7, 10 and 11 are changes proposed in this PPC that will result in aligning the documentation with existing operational processes that were originally implemented as industry-agreed workarounds.

- IN007/20 (Add further clarity to the description of the T299 (Complete MIRN Listing) file). This proposal was raised by AGL as part of South Australia (SA) Retail Market Procedure (RMP) harmonisation changes (IN006/14). AGL suggested that for consistency the obligation to provide data fields is made consistent with the Western Australian drafting.
- IN006/21 (Remove SA documentation duplication in Specification Pack (SP) and Participant Build Pack (PBP)). This proposal was raised by AEMO. It was during the design phase of the 2021 gas retail market business-to-business (B2B1) system change and aseXML schema uplift project (IN18/20), that AEMO identified that some SA sections of the SP B2B Service Order Specifications (Parts 1 and 2) document are replicated in other Technical Protocol (TP) documentation such as the FRC B2B Systems Interface Definitions and the Participant Build Pack 1 Process flow Table of Transactions / Job Enquiry Code tab. This proposal was discussed at the June 2022 GRCF meeting whereby it was noted that no material issues were raised by participants and therefore AEMO determined that it would bundle these minor changes with other minor TP changes.
- IN011/18 (Remove unnecessary “quotations marks” from the NSW/ACT Participant Build Pack). This proposal was raised by Red and Lumo as part of the SA RMP harmonisation changes (IN006/14). Red and Lumo suggested that the quotation at beginning and end of sentence that signifies NSW/ACT differences in Participant Build Pack 1, 2 and 3 are unnecessary as the blue coloured text already does this. Also, the “quotations marks” aren’t applied consistently.
- IN010/22 (Add the “Two Wells” farm-tap identification code in the Interface Control Document and RMP SA)¹. AEMO has identified that the RMP and SA/WA Interface Control Document (ICD) are out of sync with AEMO’s systems. These documents need to be updated to include the Two Wells farm tap sub-net (id# 2161) so the documentation reflects our SA systems.

See attachment A of this PPC for details about the tracked changes between the current version and the proposed changes.

4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

This is a documentation change only. There should be no system or business process implication for AEMO or Participants. The effect of implementation of these changes is:

- the documentation aligns with existing operational processes;
- enhances consistency between the regulatory frameworks for all retail gas markets; and
- further first step towards simplifying the TP by removing duplication.

5. IMPACT OF ISSUE NOT PROCEEDING

If the changes identified in this PPC do not proceed, it means that the documentation is out of sync with existing operational processes. Also, operational process improvements such as removing duplicated documentation and harmonising the documentation will not be attained, and as such, the benefit of clearer and more streamlined TP will not be realised.

¹ It is AEMO view that adding a sub-network to Heating Degree Day (HDD) zone or adding a gas zones code to a new farm tap sub-network does not require AEMO to follow the consultation process described in Part 15B of the Nation Gas Rule.



6. OVERALL COST, BENEFITS AND MAGNITUDE OF THE CHANGES

These changes are non-material as they are they are documentation only and should be non-controversial, particularly the change to do with IN009/21 as they have been previously discussed and agreed by the GRCF. 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:

- the documentation that properly reflects operational practices;
- increased consistency within the retail gas regulatory framework;
- reduced costs in terms of AEMO having to spend less time maintaining the same information in multiple documents;
- 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	AEMO’s view is that the proposed change is consistent with the NGL and NGR because the proposed change that properly reflects operational practices and promotes consistency across the four east coast jurisdictions.
National Gas Objective (NGO)	As outlined in Section 6, it is AEMO's view that this change removes any costs associated with unnecessary duplication. Also having uniform TPs across all jurisdictions 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

See Attachment A.

9. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO is targeting to implement this change in late October 2022.

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

- Issue Proposed Procedure Change (PPC) on Monday 25 July 2022



- Submission on PPC close Thursday 11 August 2022
- Issue Impact and Implementation Report (IIR) on 19 August 2022
- Submission on IIR close Friday 16 September 2022
- Issue AEMO decision Friday 7 October 2022



ATTACHMENT A – MARKED UP CHANGES (SEE SECTION 3)

Draft versions of the TPs and 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.

ATTACHMENT B - PARTICIPANT RESPONSE TEMPLATE

A response template has been attached separately to this document. Anyone wishing to make a submission to this first stage consultation are to use this response template. Submissions close Thursday 11 August 2022 and should be emailed to grcf@aemo.com.au.