

**IMPACT & IMPLEMENTATION REPORT (WA) – SUMMARY SECTION**

(For AEMO to complete and administer)

<b>Procedure Change Number</b>	IN004/18W		
Impacted jurisdiction(s)	Western Australia		
Proponent	Nandu Datar	Company	AEMO
Industry consultative forum(s) used	Procedure Change Committee (“PCC”)	Date concluded by Procedure Change Committee (“PCC”)	27 September 2018
Chapter 9 Consultation process (Ordinary or Expedited)	Ordinary		
Short description of change(s)	Complete MIRN Listing		
Procedure(s) or documentation impacted	Retail Market Procedures (WA) ver 4.0		
Summary of the change(s)	<p>Add new clause 74A to RMP WA that places an obligation on, (refer Attachment A):</p> <ul style="list-style-type: none"> <li>• The Network Operator to generate the list each month;</li> <li>• AEMO to provide the list to each registered Retailer in that market; and</li> <li>• The Retailer to ensure that they access the list only for confirming a customer’s address and MIRN details and only when they have received the explicit informed consent from the customer.</li> </ul> <p>Modify FRC B2B System Interface Definition to include new transaction type T299 (Complete MIRN Listing) in Appendix E – Non-Automated Electronic Files and add new sections to describe the generation and transfer of the MIRN listing and exchange process of the password protection of the MIRN listing.</p> <p>This IIR has been prepared in accordance with clause 382 of the RMP and is raised for consideration by gas retail market participants. As per clause 383 AEMO considers that an ordinary process is applicable and seeks submissions on the proposed changes which can be e-mailed to <a href="mailto:pccwa@aemo.com.au">pccwa@aemo.com.au</a>.</p>		
I&IR prepared by	Nandu Datar	Approved by	Michelle Norris
Date IIR published	12 October 2018	Date consultation under clause 383 or 384 concludes	12 November 2018
Contact address for written responses	GPO Box 2008, Melbourne VIC 3001		
Email address for responses	<a href="mailto:pccwa@aemo.com.au">pccwa@aemo.com.au</a>		



Other key contact information	
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**IMPACT & IMPLEMENTATION REPORT (WA) – DETAILED REPORT SECTION**

**CRITICAL EXAMINATION OF PROPOSAL**

<p>1. Description of change(s) and reasons for change(s)</p>	<p>Retail gas markets, unlike the National Electricity Market, do not have a central MIRN database which allows immediate identification of a MIRN and associated address.</p> <p>The matching of a MIRN and associated address required the submission of a MIRN Discovery Request Transaction to the gas Distribution Network (Network) with the associated transaction response timeframe and process.</p> <p>As such, it is not possible for a retailer to immediately cross check the information provided by the customer. Depending on the relevant information and discovery response, this may require multiple conversations with the customer.</p> <p>This issue was resolved some years ago in retail gas markets of VIC, QLD, SA and NSW/ACT with the provision of a Complete MIRN Listing (list). Each Network Operator generates a list of all MIRNs and addresses every month within their distribution area and provide to AEMO for distribution to Retailers registered within that market.</p> <p>WA Gas Procedure Change Committee (PCC) deferred discussion of this topic in 2014 until there was greater retail activity within the WA market.</p> <p>That retail activity has now arrived with the registration of AGL, Origin Energy and Simply Energy in the WA gas retail market.</p> <p>This proposal will require:</p> <ul style="list-style-type: none"> <li>• Retail Market Procedure (RMP) WA changes to include a new clause that places an obligation on: <ul style="list-style-type: none"> <li>○ The Network Operator to generate the list each month;</li> <li>○ AEMO to provide the list to each registered Retailer in that market; and</li> <li>○ The Retailer to ensure that they access the list only for confirming a customer’s address and MIRN details and only when they have received the explicit informed consent from the customer.</li> </ul> </li> <li>• Specification pack changes to describe format of the MIRN listing and how the list is generated and provided to the Retailers;</li> <li>• The Network Operator in WA gas retail market, ATCO to amend their system to generate this list at the end of each month and send to AEMO via an agreed transfer method; and</li> <li>• AEMO to provide a file transfer facility for the Network Operator to submit the list and develop an automated</li> </ul>
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	process that will transfer the list to the designated area of each registered Retailer.
<p>2. Reference documentation</p> <ul style="list-style-type: none"> <li>▪ Retail Market Procedure (the “Procedures”);</li> <li>▪ AEMO Business/Information Specification Pack Reference; and/or</li> <li>▪ Other Reference.</li> </ul>	<p>Retail Market Procedures (WA) version 4.0            FRC B2B System Interface Definition version 4.3; and            Specification Pack User Guide version 4.7.</p>
<p>3. The high-level details of the change(s) to the existing Procedure            This includes:</p> <ul style="list-style-type: none"> <li>▪ a comparison of the existing operation of the Procedure to the proposed change to the operation of the Procedure; and</li> <li>▪ a marked up version of the proposed Procedure changes (see Attachment A)</li> </ul>	<p>Add new clause 74A to RMP WA that places an obligation on, (refer Attachment A):</p> <ul style="list-style-type: none"> <li>• The Network Operator to generate the list each month;</li> <li>• AEMO to provide the list to each registered Retailer in that market; and</li> <li>• The Retailer to ensure that they access the list only for confirming a customer’s address and MIRN details and only when they have received the explicit informed consent from the customer.</li> </ul> <p>Modify FRC B2B System Interface Definition to include new transaction type T299 (Complete MIRN Listing) in Appendix E – Non-Automated Electronic Files and add new sections to describe the generation and transfer of the MIRN listing and exchange process of the password protection of the MIRN listing (refer Attachment B).</p>
<p>4. Explanation regarding the order of magnitude of the change            (e.g. material, non-material or non-substantial)</p>	<p>The Network Operator will need to make system changes to generate the list and submit to their existing designated folder on GRMS.</p> <p>AEMO will need to develop an automated process to transfer the list from the Network Operator’s folder to all registered Retailers existing designated folders on GRMS.</p> <p>AEMO considers the order of magnitude of this change is ‘non-substantial’.</p>

**ASSESSMENT OF LIKELY EFFECT OF PROPOSAL**

<p>5. Overall Industry cost/benefit analysis (tangible / intangible / risk) and/or cost estimates</p>	<p>With multiple retailers in the WA market vying for customers, the number of MIRN requests submitted to the Network Operator will increase over time and stay at elevated levels, without the provision of a complete MIRN listing.</p> <p>While this will not remove the need for some MIRN discovery requests to be issued, the number of requests will be substantially lower than current numbers.</p>
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	<p>The impact of failed MIRN discovery requests has an impact on the following stakeholders:</p> <p>Network Operator</p> <ul style="list-style-type: none"> <li>• Network Operator resource in analysing and responding to the failed request.</li> </ul> <p>Retailers</p> <ul style="list-style-type: none"> <li>• Retailer resource in reviewing and re-requesting the necessary data;</li> <li>• Retailer resource in undertaking additional customer contact; and</li> <li>• Allow retailer processes to move to the next step in most instances.</li> </ul> <p>Customers</p> <ul style="list-style-type: none"> <li>• Delays in consumer transactions while transactions are responded to and information is completed.</li> </ul>
<p>6. The likely effect of the change(s) on stakeholders (e.g. industry or end-users)</p>	<p>Network Operator</p> <ul style="list-style-type: none"> <li>• Substantially reduced resources for generating responses;</li> <li>• One-off cost of developing the full MIRN discovery report and delivering it to AEMO; and</li> <li>• The cost of sending a file to AEMO each month (can be automated).</li> </ul> <p>Retailers</p> <ul style="list-style-type: none"> <li>• Eliminate majority of wait time for MIRN discovery, allowing retailer resources to manage the next stage in the process directly; and</li> <li>• Reduced resources in managing MIRN discovery and discovery failures for retailers.</li> </ul> <p>Customers</p> <ul style="list-style-type: none"> <li>• Improved customer service through reduced unnecessary contacts and faster retailer switches.</li> </ul>
<p>7. Testing requirements</p>	<p>Testing will involve:</p> <ul style="list-style-type: none"> <li>• Network Operator generating the list and transferring to their existing designated folder on GRMS;</li> <li>• AEMO's automated process transferring the list to all Retailers existing designated folders on GRMS; and</li> <li>• Retailers confirming receipt of the list.</li> </ul>

<p>8. AEMO's preliminary assessment of the proposal's compliance with clause 378 of the RMP</p>	<p><u>Ensure that the retail gas market operates and is governed in a manner that is, (i) open and competitive; (ii) efficient; and (iii) fair to participants and their customers.</u></p> <p>AEMO's view is that the proposed change will continue to promote competition, is not unreasonably costly to implement and doesn't disadvantage participants and their customers.</p> <p><u>Ensure compliance with all applicable laws.</u></p> <p>AEMO's view is that the proposed changes are consistent with the applicable laws.</p> <p><u>Ensure effective consultation occurs and gives stakeholder's opportunities to provide feedback of the proposed changes.</u></p> <p>AEMO's view is that the stakeholders have already provided feedback to the PCR and are invited to provide feedback as part of this round of consultation.</p>
<p>9. Consultation forum outcomes (e.g. the conclusions made on the change(s), whether there was unanimous approval, any dissenting views)</p>	<p>On 29 August 2018 AEMO published on its website a PCR that recommended minor documentation changes as described in Attachment A and B. Registered participants and interested stakeholders were invited to make submissions which closed on 27 September 2018.</p> <p>AEMO received submissions from AGL and Origin Energy proposing further amendments to Transaction 299. AEMO has addressed the feedback by adding a statement to the description of transaction Complete MIRN Listing (T299). Please refer to Attachment C for the participant feedback.</p>
<p>10. Authorisation review:</p> <ul style="list-style-type: none"> <li>▪ does this Procedure change impact the ACCC authorisation?</li> </ul>	<p>The Australian Competition and Consumer Commission (ACCC) granted Authorisations to REMCo to operate Chapter 5 (Allocation, Reconciliation and Swing) and Chapter 6 (Compliance and Interpretation) of the RMPs and associated ancillary deeds. The ACCC approved variations to the Authorisations to enable REMCo to transfer administration to AEMO.</p> <p>Authorisation is a process where the ACCC may grant protection from legal action for anti-competitive conduct that might otherwise breach the Competition and Consumer Act 2010 (the CCA) where there is an offsetting public benefit from the conduct.</p> <p>Changes to the RMP Chapters and ancillary deeds covered by the Authorisations must be assessed to determine whether the change impacts the Authorisation.</p> <p>Because clauses 378 to 387 inclusive are provisions that are not part of Chapters 5 or 6 of the RMPs or ancillary deeds covered by the Authorisations, a review of the ACCC Authorisations is not required.</p>
<p>11. Should the proposed Procedure change be made, (with or without amendments)?</p>	<p>AEMO recommends that the proposed procedure changes as described in this IIR should be made with suggested amendments.</p>

<p>12. If applicable, a proposed effective date for the proposed Procedure change(s) to take effect and justification for that timeline.</p>	<p>The proposed procedure changes are to be published in a new version 5.0 of the RMP that is targeted for an effective date of late March 2018.</p>
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**ATTACHMENT A – DOCUMENTATION CHANGES (SEE SECTION 3)**

**Retail Market Procedures (WA)**

All amendments to the Procedure are change marked, where underlining (blue) represents an addition, and ~~strike (red)~~ through represents a deletion.

**74A ~~There is no clause 74A~~ Complete MIRN Listing**

- (a) Each network operator must use its best endeavours to update, format and deliver a new complete MIRN listing in accordance with the AEMO Specification Pack which is to be made available to AEMO by 5pm on the fifth business day after the end of the calendar month or as otherwise agreed from time to time by all relevant parties.
- (b) AEMO must make each complete MIRN listing available to all users after it is received from the network operator.
- (c) The user must ensure that the complete MIRN listing is accessed and used solely to confirm the relevant discovery address/MIRN details of the customer.
- (d) The user must ensure that the customer has provided explicit informed consent to access and use the complete MIRN listing to confirm the relevant discovery address/MIRN details of the customer in relation to the delivery point.

**ATTACHMENT B – DOCUMENTATION CHANGES (SEE SECTION 3)**

**FRC B2B System Interface Definition**

**Appendix E Non Automated Electronic Files**

**Overview**

The following sections specify the format of those B2B ‘electronic file’ transactions (not aseXML) which use CSV components. The CSV component will be incorporated into a file, compressed and then communicated via an e-mail or on a disk.

The CSV file name shall be constructed as described in the CSV File Format Specification Document. If the CSV file is attached to an e-mail, the subject line must be constructed as defined in CSV File Format Specification Document. The transaction name must be taken from the table below.

This document covers CSV details for the following transactions.

<b>Transaction number</b>	<b>Transaction Type Description</b>	<b>CSV File Name / e-Mail Subject Component Name</b>
45	Energy History Request	ENERGYHISTORYREQUEST
45A	Bulk Basic-Metered Energy History Request	BULKBASICHISTORYREQUEST
46	Energy History Response	ENERGYHISTORYRESPONSE
	Interval Meter Energy History Response	INTERVALHISTORYRESPONSE
71	Amend Customer Details	AMENDCUSTOMERDETAILS
74	Annual Meter Reading Schedule	METERREADINGSCHEDULE
75	Meter Reading Route Change	READINGROUTECHANGE
136	Time Expired Meters Notification	TIMEEXPIREDMETERS
289	Standing Data Change From DB	STANDINGDATACHANGE
298	Refresh of New Street Listing for MIRN Discovery	NEWSTREETLISTING
<a href="#">299</a>	<a href="#">Complete MIRN Listing</a>	<a href="#">distributor_ccyymmddhhmiss.zip</a>
330	Notification of Planned Outage	SERVICERENEWAL
333	Meter Range Updates	METERRANGEUPDATE

	Interval Meter Data	INTERVALMETERDATA
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Note, the order of columns designators/headers in CSV files described by this document is fixed and is as defined in this specification.

### Complete MIRN Listing (T299)

The Network Operator must make available to Users a listing of all distribution metering supply points that have a MIRN assigned and a MIRN status of either Registered (up stand installed), Commissioned (meter installed) or Decommissioned (meter removed). The Network Operator must ensure that all data fields as per Transaction 299 that are available in their database are transferred to the Complete MIRN Listing.

The Network Operator must ensure that the complete MIRN listing file is encrypted and compressed (see section 4.4 for allowable compression formats) in a way that when the User retrieves the file it can be decrypted and uncompressed using the “WinZip” utility.

The Network Operator will utilise the CSV fields and formats consistent with the fields and formats that are used in the aseXML schema applicable for a MIRN Discovery response which is defined in FRC B2B Systems Interface Definitions, section 4.3.2.3 (NMIDiscoveryResponse).

The Complete MIRN Listing is to be refreshed after the end of the calendar month by the Network Operator and the Network Operator must FTP the refreshed files to their existing designated folder on GRMS. AEMO will transfer the Complete MIRN Listing to the existing designated folder for each User on GRMS.

The following file naming convention is to be used:

  \_distributor\_ccyymmddhhmiss.zip

Note: Reference to “Network Operator” and “User” refer to the Hub participant ID.

<u>Transaction 299</u>		
<u>Heading/Column designator</u>	<u>Mandatory/Optional</u>	<u>Comment</u>
<u>MIRN</u>	<u>M</u>	<u>Must be present</u>
<u>MIRNChecksum</u>	<u>M</u>	<u>Must be present</u>
<u>FlatOrUnitType</u>	<u>O</u>	
<u>FlatOrUnitNumber</u>	<u>O</u>	
<u>FloorOrLevelType</u>	<u>O</u>	
<u>FloorOrLevelNumber</u>	<u>O</u>	
<u>BuildingOrPropertyName1</u>	<u>O</u>	
<u>BuildingOrPropertyName2</u>	<u>O</u>	
<u>LocationDescriptor</u>	<u>O</u>	
<u>HouseNumber1</u>	<u>O</u>	
<u>HouseNumber2</u>	<u>O</u>	
<u>HouseNumberSuffix1</u>	<u>O</u>	
<u>HouseNumberSuffix2</u>	<u>O</u>	
<u>LotNumber</u>	<u>O</u>	
<u>StreetName1</u>	<u>O</u>	

<u>Transaction 299</u>		
<u>Heading/Column designator</u>	<u>Mandatory/Optional</u>	<u>Comment</u>
<u>StreetName2</u>	<u>0</u>	
<u>StreetType1</u>	<u>0</u>	
<u>StreetType2</u>	<u>0</u>	
<u>StreetSuffix1</u>	<u>0</u>	
<u>StreetSuffix2</u>	<u>0</u>	
<u>PostalDeliveryType</u>	<u>0</u>	
<u>PostalDeliveryNumberPrefix</u>	<u>0</u>	
<u>PostalDeliveryNumberValue</u>	<u>0</u>	
<u>PostalDeliveryNumberSuffix</u>	<u>0</u>	
<u>SiteAddressCity</u>	<u>0</u>	
<u>SiteAddressState</u>	<u>0</u>	
<u>SiteAddressPostcode</u>	<u>0</u>	
<u>SiteAddressDPID</u>	<u>0</u>	
<u>GasMeterNumber</u>	<u>0</u>	
<u>Address1</u>	<u>0</u>	
<u>Address2</u>	<u>0</u>	
<u>Address3</u>	<u>0</u>	

Refer Appendix A Data Dictionary – CSV Data Elements for the description of the address elements from the table above

### Password exchange process

The complete MIRN listing password exchange process is as follows:

- User to nominate an email address to send password. These details are sent to Network Operators;
- Password to change each 90 days; and
- Network Operators to email password details to user prior to it being used.



**ATTACHMENT C – Consolidated List of Participant Feedback to Procedure Change Request**

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT <del>RED STRIKEOUT</del> MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
AEMO	File transfer solution option	Original proposal of using the MIBB facility (described in the PCR) to receive and send Complete MIRN Listing has been changed to using participants designated folders on GRMS		AEMO evaluated various solution option and has concluded that the proposed option to use GRMS is the most cost effective and can be implemented quickly. The relevant text in IIR reflects the new solution option
AGL	General comment	AGL prepared this submission and supports the proposal.		AEMO acknowledges AGL's support.
AGL	General comment	As a matter of course, AGL would like to see this proposal delivered as quickly as possible to minimise customer transfer issues.		AEMO acknowledges AGL's comment and wishes to advise that we aim to deliver the proposal as quickly as possible.

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT <del>RED STRIKEOUT</del> MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT		AEMO RESPONSE														
AGL	Appendix E – Transaction 299	<p>AGL notes that the majority of fields in the T299 transaction are listed as Optional.</p> <p>AGL suggests that these should be ‘Required’, that is, the information should be provided if available.</p> <p>It may be necessary to update this specification elsewhere for consistency, but AGL understands that other networks provide the information if it is available.</p>			AEMO acknowledges AGL’s comment and has amended the description for transaction ‘Complete MIRN Listing (T299)’ under Appendix E of FRC B2B System Interface Description.														
Origin Energy	Attachment B of PCR	<p>The fields mentioned in Attachment B – File Specification for Complete MIRN Listing outlines that the only fields that are ‘Mandatory’ are the MIRN and MIRN Checksum.</p> <p>When retail frontline staff use the MIRN listing they also require additional information re:</p>	<table border="1"> <thead> <tr> <th data-bbox="1142 981 1518 1043">Heading/Column designator</th> <th data-bbox="1518 981 1800 1043">Mandatory/Optional</th> </tr> </thead> <tbody> <tr> <td data-bbox="1142 1043 1518 1094">MIRN</td> <td data-bbox="1518 1043 1800 1094">M</td> </tr> <tr> <td data-bbox="1142 1094 1518 1145">MIRNChecksum</td> <td data-bbox="1518 1094 1800 1145">M</td> </tr> <tr> <td data-bbox="1142 1145 1518 1197">FlatOrUnitType</td> <td data-bbox="1518 1145 1800 1197"><del>O</del><u>R</u></td> </tr> <tr> <td data-bbox="1142 1197 1518 1248">FlatOrUnitNumber</td> <td data-bbox="1518 1197 1800 1248"><del>O</del><u>R</u></td> </tr> <tr> <td data-bbox="1142 1248 1518 1299">FloorOrLevelType</td> <td data-bbox="1518 1248 1800 1299"><del>O</del><u>R</u></td> </tr> <tr> <td data-bbox="1142 1299 1518 1332">FloorOrLevelNumber</td> <td data-bbox="1518 1299 1800 1332"><del>O</del><u>R</u></td> </tr> </tbody> </table>		Heading/Column designator	Mandatory/Optional	MIRN	M	MIRNChecksum	M	FlatOrUnitType	<del>O</del> <u>R</u>	FlatOrUnitNumber	<del>O</del> <u>R</u>	FloorOrLevelType	<del>O</del> <u>R</u>	FloorOrLevelNumber	<del>O</del> <u>R</u>	AEMO acknowledges Origin Energy’s comment and wishes to advise that the suggested value of ‘R’ is not allowed. The values can only be ‘M’ or ‘O’. AEMO has addressed this request by amending
Heading/Column designator	Mandatory/Optional																		
MIRN	M																		
MIRNChecksum	M																		
FlatOrUnitType	<del>O</del> <u>R</u>																		
FlatOrUnitNumber	<del>O</del> <u>R</u>																		
FloorOrLevelType	<del>O</del> <u>R</u>																		
FloorOrLevelNumber	<del>O</del> <u>R</u>																		

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT <del>RED STRIKEOUT</del> MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT		AEMO RESPONSE
		site address details. As such we request the remaining fields be changed from 'Optional' to 'Required' so if the information is available it is provided.	BuildingOrPropertyName1	<del>○</del> <u>R</u>	the description for transaction 'Complete MIRN Listing (T299)' under Appendix E of FRC B2B System Interface Description.
			BuildingOrPropertyName2	<del>○</del> <u>R</u>	
			LocationDescriptor	<del>○</del> <u>R</u>	
			HouseNumber1	<del>○</del> <u>R</u>	
			HouseNumber2	<del>○</del> <u>R</u>	
			HouseNumberSuffix1	<del>○</del> <u>R</u>	
			Heading/Column designator	Mandatory/Optional	
			HouseNumberSuffix2	<del>○</del> <u>R</u>	
			LotNumber	<del>○</del> <u>R</u>	
			StreetName1	<del>○</del> <u>R</u>	
			StreetName2	<del>○</del> <u>R</u>	
			StreetType1	<del>○</del> <u>R</u>	
			StreetType2	<del>○</del> <u>R</u>	
			StreetSuffix1	<del>○</del> <u>R</u>	
			StreetSuffix2	<del>○</del> <u>R</u>	
			PostalDeliveryType	<del>○</del> <u>R</u>	
			PostalDeliveryNumberPrefix	<del>○</del> <u>R</u>	
			PostalDeliveryNumberValue	<del>○</del> <u>R</u>	
			PostalDeliveryNumberSuffix	<del>○</del> <u>R</u>	



STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT <del>RED STRIKEOUT</del> MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT		AEMO RESPONSE
			SiteAddressCity	<del>Q</del> <u>R</u>	
			SiteAddressState	<del>Q</del> <u>R</u>	
			SiteAddressPostcode	<del>Q</del> <u>R</u>	
			SiteAddressDPID	<del>Q</del> <u>R</u>	
			GasMeterNumber	<del>Q</del> <u>R</u>	
			Address1	<del>Q</del> <u>R</u>	
			Address2	<del>Q</del> <u>R</u>	
			Address3	<del>Q</del> <u>R</u>	