

# PROPOSED PROCEDURE CHANGE (PPC)

**Issue Number** IN006-17

**Impacted Jurisdiction(s)** South Australia

**Proponent** AEMO **Company** AEMO

**Proponent e-mail** grcf@aemo.com.au

**Affected Gas Market(s)** Retail **Date proposal sent to AEMO** Thursday, 1 June 2017

**Short Issue Title** Amend the South Australian (SA) Retail Market Procedures (RMP) so that they more aligned with the other east coast jurisdictions.

**Other key contact information**

VERSION #	PRESENTED TO	DATE
Eg. 1.0	GRCF	1 July 2009



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

### 1. DESCRIPTION OF ISSUE

Currently the South Australian (SA) Retail Market Procedures (RMP) are written very differently compared to other east coast jurisdictions.

In mid-2017, SA participants approached AEMO to undertake a review to harmonise the SA RMP with the other gas retail market jurisdictions. With the support of the Gas Retail Consultation Forum (GRCF), this initiative was added to the GRCF program of work and a set of guiding principles (see Attachment A) were developed and agreed. In late 2017 a sub group of subject matter experts was formed comprising GRCF representatives from organisations that are registered in the SA Retail Market to assist AEMO progress this initiative.

The first draft of the harmonised SA RMPs was issued to the sub group in early 2018 inviting feedback. In identifying opportunities to harmonise the SA RMPs, several changes to other procedures and technical protocols were identified (see Section 2 for further details). In developing the draft harmonised SA RMPs detailed in this PPC, four earlier drafts of the harmonised SA RMPs, procedures and technical protocols were reviewed by the GRCF sub group. Feedback from the sub group on the fourth and final draft of the SA RMP concluded on 30 August 2019 with AEMO making further changes which were minor in nature.

Given the earlier drafts and substantively reduced feedback from the sub group in the final draft, AEMO has decided to commence the formal consultation process.

The changes proposed in this PPC involve aligning the SA RMPs with RMPs in other jurisdictions which involves substantive rewording of many of the existing definitions and clauses. None of these changes are intended to alter any of the existing obligations placed on participants or AEMO.

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

Anyone wishing to make a submission for this first stage consultation are to use the response template provided in Attachment B. Submissions close Friday 1<sup>st</sup> November 2019 and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

### 2. REFERENCE DOCUMENTATION

Attachment C is the Reference Documentation which provides a detailed summary of the changes across each of the SA RMPs, other procedures and technical protocol.

### 3. OVERVIEW OF CHANGES

As noted in Section 1 of this PPC, the proposed changes focus on harmonising the SA RMPs with the other jurisdictions. The harmonised versions of the SA RMPs, other procedures and technical protocol changes are included in Attachment D.

As noted in Section 2 of this PPC, the table in Attachment C provides a summary of changes across each of the SA RMPs, other procedures and technical protocol. All changes in described in Attachment D are documentation changes only and have no IT system or material business process impact on participants.

### 4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

For participants the proposed changes represent documentation changes only and participants will not be required to make any modifications to their existing systems or business processes.



For AEMO these change predominantly represent documentation changes, however there is a small IT system change to AEMO SA system required to remove the functionality of maintaining the Small Use Customer Indicator.

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

Not proceeding with changes proposed in the PPC will mean SA will continue to have RMPs that are inconsistent with other jurisdictions. This means that additional complexities will continue for retailers wanting to operate in SA, which may act as a barrier to entry for new gas market retail participants.

## **6. OVERALL COST, BENEFITS AND MAGNITUDE OF THE CHANGES**

Since these changes have not identified any market impacts, AEMO does not expect there to be any participant costs as a result of executing them. AEMO will incur a minor cost estimated to be around \$10,000 to make minor IT system changes to remove the functionality of maintaining the Small Use Customer Indicator and changes to Specification Pack artefacts that AEMO outsources to its IT service provider to maintain.

Given there should be no participant costs and minimal AEMO costs, AEMO has assessed this change to be non-material.

In terms of benefits, there are no tangible benefits however the following intangible benefits are likely to be realised:

- Increased consistency within the retail gas regulatory framework for the east coast jurisdictions;
- More uniform RMPs across all jurisdictions will reduce the complexities normally associated with entering gas retail markets, particularly for those retailers wanting to operate in SA; and
- Clear and easy to understand RMPs, which (in addition to ensuring clarity for existing participants) will lower barriers to entry for new participants.

## **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 promotes consistency across the four east coast jurisdictions.

National gas objective:

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.

Applicable access arrangements:

AEMO's view is that the proposed change is not in conflict with existing Access Arrangements.

## **8. SUPPORTING DOCUMENTATION**

Please refer to Section 2.



## 9. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO is targeting to implement this initiative in late January 2020. In order to achieve this timeline, AEMO proposes the following key milestones:

- Issue Proposed Procedure Change (PPC) on Monday 14<sup>th</sup> October;
- Submission on PPC closes Friday 1<sup>st</sup> November 2019;
- Issue Impact and Implementation Report (IIR) on Friday 15<sup>th</sup> November 2019;
- Submissions on IIR close Friday 13<sup>th</sup> December 2019;
- AEMO decision on Monday 30<sup>th</sup> December 2019; and
- Effective date late January 2020.



## ATTACHMENT A – GUIDING PRINCIPLES TO HARMONISE THE SA RMPs

The following is the agreed set of guiding principles established by the GRCF to harmonise the SA RMPs:

- a) No change to existing substantive obligations, and no new obligations added.
- b) Where obligations are substantially the same, the wording contained in the NSW/ACT procedure clauses will be used as the foundation to update SA procedures where this can readily be achieved without potentially changing the obligation.
- c) There will be sets of obligations that are similar and may be capable of further harmonisation (e.g. detailed meter reading/metering data, allocation/reconciliation), but identifying any necessary differences will require detailed analysis by all participants and as such is excluded from scope. A further harmonisation stage will likely be required.
- d) Matters of detail concerning notices, services orders and other communications/transactions that are covered by the Gas Interface Protocol (GIP) in other jurisdictions should generally be addressed by the AEMO Specification Pack in SA and removed from the SA RMPs.
- e) If an equivalent or superior head of power for an obligation exists elsewhere within the regulatory framework (example National Gas Rules (NGR), Law, jurisdictional regulation, etc), such provisions will not be replicated in the SA RMP. Any inconsistencies will need to be resolved.
- f) Matters that are not consistent with the nature of the RMPs as contemplated under the NGL regime should be removed or modified as appropriate (e.g. provisions of a contractual nature, enforcement matters).
- g) Due to the number of changes, moved clauses, changed numbering conventions and deletions, a marked-up version showing the differences between the current version and the revised harmonised SA RMP will not be provided.



## **ATTACHMENT B – PPC RESPONSE TEMPLATE**

The PPC response template has been attached separately to this document. There are two sections within the template:

- Section 1 seeks feedback on the on the PPC; and
- Section 2 seeks feedback on the individual changes within each of the procedures.

Anyone wishing to make a submission for this first stage consultation are to use this response template. Submissions close 1 November 2019 and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

## ATTACHMENT C – REFERENCE DOCUMENTATION (SEE SECTION 2)

The rows in the table below that are shaded in yellow (Reference # 1 to 8 inclusive) are documents that need to follow the RMP consultation process.

The rows that are not shaded (Reference # 9 to 10 inclusive) are reference material only.

Ref#	Title of document and any notes.	Ver #	Summary of the change
1	SA RMPs.  Clean version.  Includes comments that references old clause number	17.0	<ol style="list-style-type: none"> <li>1. Old clause - clause 2 (Definitions) New clause 1.2.1 <ul style="list-style-type: none"> <li>• Lots of rewording and removal of definitions that are no longer required or covered in AEMO Spec Pack (FRC B2M B2B Hub System Specifications, SA/WA Interface Control Document (ICD), FRC B2B System Interface Definitions) and additional definition added.</li> </ul> </li> <li>2. Part 1.3 Old Clauses 8 to 12 (Notices) <ul style="list-style-type: none"> <li>• Moved across or already covered in to AEMO Spec Pack documents (Example section 2.5.5 of the "FRC B2M B2B Hub System Specifications covers notices despatched for aseXML transaction (immediately or promptly)).</li> </ul> </li> <li>3. Part 1.4 (These Procedures and other instruments) <ul style="list-style-type: none"> <li>• Old Clause 14B (FRC HUB Operating Terms and Conditions). New clause 1.3.4 <ul style="list-style-type: none"> <li>◦ Applying the Gas FRC B2B Connectivity Testing and System Certification approach which applies in Vic, QLD and NSW/ACT to SA.</li> </ul> </li> </ul> </li> <li>4. Part 2.1 (The AEMO Registry) <ul style="list-style-type: none"> <li>• Old clause 20 (AEMO standing data). New clause 2.3.1. <ul style="list-style-type: none"> <li>◦ The reference to information source for each attribute is removed. The reference to small use customer indicator is gone. This indicator no longer needs to be maintained.</li> </ul> </li> <li>• Old clause 21B (Readiness certification). New clause 1.3.4. <ul style="list-style-type: none"> <li>◦ See dot point 3. Certification of FRC transactions routed via the GRMS FTP Gateway is a mandatory activity for Retailers but optional for Self-Contracting Users (SCU). See section 5 of updated Gas FRC B2B Connectivity Testing and System Certification</li> </ul> </li> <li>• Old clause 23 (AEMO to provide bulk AEMO standing data). <ul style="list-style-type: none"> <li>◦ Deleted as Standing Data requirements including the timing provision in a centralised location such as the ICD (section 8.7.3 and 8.7.4).</li> </ul> </li> </ul> </li> </ol>



Ref#	Title of document and any notes.	Ver #	Summary of the change
			<p>5. Part 2.2 (Changing the AEMO Registry)</p> <ul style="list-style-type: none"> <li>• Old Div 2.2.1 (Obligation to Keep AEMO Registry Accurate) and 2.2.2 (Data Change Notices) old clause 24 to 31. <ul style="list-style-type: none"> <li>◦ Removed. Covered in the AEMO Spec Pack therefore doesn't need to be in RMP as well.</li> </ul> </li> <li>• Old Div 2.2.3 (Error correction notice). Old Clause 32 to 48. New clause 9.1.1 to 9.1.13. <ul style="list-style-type: none"> <li>◦ Scope only relates to transfers which is the same as NSW/ACT.</li> </ul> </li> <li>• Old Div 2.2.5 (Updating AEMO Registry and Provision of AEMO Standing Data). Old clause 49 to 53. <ul style="list-style-type: none"> <li>◦ Removed. Covered in the AEMO Spec Pack (ICD) therefore doesn't need to be in RMP as well. Part 2.1 (The AEMO Registry)</li> </ul> </li> </ul> <p>6. Part 3.1 (New Connections)</p> <ul style="list-style-type: none"> <li>• Old clauses 63 to 69. New clause 2.1 and 4.1. <ul style="list-style-type: none"> <li>◦ Largely rewritten.</li> </ul> </li> </ul> <p>7. 7. Part 3.3 (Transfers)</p> <ul style="list-style-type: none"> <li>• Old clauses 77 to 103. New clause 6.1 to 6.8 <ul style="list-style-type: none"> <li>◦ The "if the transfer is "not validated" / valid" has been simplified.</li> </ul> </li> </ul> <p>8. Part 3.5 (Disconnection and Reconnection of Delivery Points)</p> <ul style="list-style-type: none"> <li>• Old clauses 105 to 124. New clause 4.2 <ul style="list-style-type: none"> <li>◦ Some definitional changes (eg "Disconnection notice" becomes "de energisation request"). Removal of confirmation notices as these are covered in AEMO Spec Pack.</li> </ul> </li> </ul> <p>9. Part 3.6 (Removing Delivery Points and Deregistering MIRNs)</p> <ul style="list-style-type: none"> <li>• Old clauses 125 to 133. New clause 4.4 to 4.5 <ul style="list-style-type: none"> <li>◦ Some definitional changes (eg "Permanent removal request" becomes "deregistration request"). Removal of confirmation notices as these are covered in AEMO Spec Pack. Largely unchanged.</li> </ul> </li> </ul> <p>10. Part 4.1 (Metering Equipment), Part 4.2 (Meter Reading Requirements), Part 4.3 (Gate Point Metering Data), Part 4.4 (Metering Data), Part 4.5 (Heating Value Data)</p> <ul style="list-style-type: none"> <li>• Old clauses 134 to 171. New clause 3.1 to 3.9</li> </ul>





Ref#	Title of document and any notes.	Ver #	Summary of the change
			<ul style="list-style-type: none"> <li>○ Some definitional changes (eg “energy value” becomes “consumed energy”). Largely unchanged.</li> <li>11. Chapter 5 (Allocation and Reconciliation),               <ul style="list-style-type: none"> <li>• Old clauses 171A to 308. New clause 8.1 to 8.10.</li> <li>○ Largely unchanged.</li> </ul> </li> <li>12. Chapter 6 (Compliance and Interpretation),               <ul style="list-style-type: none"> <li>• Old clauses 309 to 348.</li> <li>○ Deleted.</li> </ul> </li> <li>13. Chapter 7 (Reporting and Audits),               <ul style="list-style-type: none"> <li>• Old clauses 349 to 361A. New clause 1.5, 7.1</li> <li>○ Largely unchanged</li> </ul> </li> <li>14. Chapter 8 (Administration),               <ul style="list-style-type: none"> <li>• Old clauses 362 to 377B. New clause 1.4.</li> <li>○ Only old clause 363 is retained. The rest is deleted including clause 373B (AEMO to determine the small use customer indicator.</li> </ul> </li> <li>15. Chapter 11 (Retailer of Last Resort),               <ul style="list-style-type: none"> <li>• Old clauses 408 to 418. New clause 7.1 to 7.2.</li> <li>○ Largely unchanged.</li> </ul> </li> <li>16. Appendix 1 (Coding of Zones),               <ul style="list-style-type: none"> <li>• Old sub appendix 1.2.1 to 1.2.2.</li> <li>○ Largely unchanged but moved into section 2.3.2 of the ICD.</li> </ul> </li> <li>17. Appendix 2 (Estimation and Verification Methodology),               <ul style="list-style-type: none"> <li>• Old Sub appendix 2.2 to 2.3. New Appendix A.</li> <li>○ Largely unchanged.</li> </ul> </li> <li>18. Appendix 3 (Calculation of the MIRN checksum),               <ul style="list-style-type: none"> <li>• Old Sub appendix 3.1.</li> <li>○ Deleted. Covered in MIRN Structure document.</li> </ul> </li> <li>19. Appendix 4 (Auditor’s Deed of Undertaking)               <ul style="list-style-type: none"> <li>• Old Sub appendix 4.1.</li> <li>○ Deleted.</li> </ul> </li> <li>20. Appendix 5 (Calculations, Rounding and Units)</li> </ul>



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Ref#	Title of document and any notes.	Ver #	Summary of the change
			<ul style="list-style-type: none"> <li>• OLD Sub appendix 5.1. New clause 1.2.2.               <ul style="list-style-type: none"> <li>◦ Some changes.</li> </ul> </li> <li>21. Appendix 11 (Heating Degree Day)               <ul style="list-style-type: none"> <li>• Old Sub appendix 11.1. New Appendix B.                   <ul style="list-style-type: none"> <li>◦ Some changes.</li> </ul> </li> </ul> </li> </ul>
2	SA/WA Interface Control Document (ICD)  Marked up showing differences between current version	5.0	<ol style="list-style-type: none"> <li>1. New section added (2.1.1) that explains the assignment of GBO ids.</li> <li>2. New section added (2.3) that explains gas zones and gate points.</li> <li>3. Placed the technical validation rules that were in the RMP into section 8 for some transaction.</li> <li>4. Update old RMP clause reference with new RMP clause reference. .</li> </ol>
3	FRC B2B System Interface Definitions  Marked up showing differences between current version	4.6	<ol style="list-style-type: none"> <li>1. Update old RMP clause reference with new RMP clause reference.</li> <li>2. Update Appendix E (Non-Automated Electronic Files) to include the existing Complete MIRN Listing transaction</li> <li>3. Update Appendix F (Unstructured Transactions) to include transaction that existed in the Non-IT RMR Communications document.</li> </ol>
4	Connectivity Testing and Technical Certification  Marked up showing differences between current version	3.7	<ol style="list-style-type: none"> <li>1. Update this document so it is WA only. The Gas FRC B2B Connectivity Testing and System Certification document will govern certification.</li> </ol>
5	Readiness Criteria  Marked up showing differences between current version	2.3	<ol style="list-style-type: none"> <li>1. Update this document so it is WA only.</li> </ol>
6	Gas FRC B2B Connectivity Testing and System Certification  Marked up showing differences between current version	1.9	<ol style="list-style-type: none"> <li>1. Add SA as a jurisdiction to adopt this document</li> </ol>



PROPOSED PROCEDURE CHANGE (PPC)

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Ref#	Title of document and any notes.	Ver #	Summary of the change
7	NSW/ACT RMP  Marked up showing differences between current version	24.0	1. Clause 1.1.2 (d) to (f) (Wagga Wagga and Tamworth). Update old RMP clause reference with new RMP clause reference.
8	Participant Build Pack 6 (NSW/ACT – Wagga Wagga and Tamworth)  Marked up showing differences between current version	3.0	1. Minor changes such as old RMP clause reference with new RMP clause reference. 2. Placed the Wagga Wagga Tamworth (WWT) Gas Zone Codes from NSW/ACT RMPs into section 11.6 of the ICD. (Note This may move to Participant Build Pack 6 (covering the Wagga Wagga and enviros, and Tamworth networks) as a separate Appendix
9	SA RMPs.  Current version with comments added showing cross reference new clause number in ver 17.0	16.0	Not applicable
10	Clause cross reference mapping between SA RMP ver 16 and 17	Not applicable	Not applicable



## **ATTACHMENT D – DOCUMENTATION CHANGES (SEE SECTION 3)**

Blue represents additions Red and ~~strikeout~~ represents deletions – Marked up changes

The draft versions of the Retail Market Procedures are attached separately to this document.

Draft version of the technical protocols showing tracked changes between the current version and the proposed changes is attached separately to this document.