

PROCEDURE CHANGE REQUEST (PCR)

Summary Section

Issue Number	IN004/18W		
Impacted Jurisdiction(s)	Western Australia		
Proponent	Nandu Datar	Company	AEMO
Proponent e-mail	Nandu.datar@aemo.com.au	Proponent phone #	03 9609 8851
Date proposal (GMI) sent to AEMO	NA	Date PCR issued/received	Friday, 8 March 2019
Short Issue Title	Complete MIRN Listing – Version 2		

Other key contact information grcf@aemo.com.au

VERSION #	PRESENTED TO	DATE
1.0	GRCF	29 August 2018
2.0	GRCF – Post ERA determination on Version 1.0	8 March 2019



PROCEDURE CHANGE REQUEST (PCR) – DETAILED REPORT SECTION

1. DESCRIPTION OF CHANGE(S) AND REASONS FOR CHANGE(S)

Original Proposal

AEMO first commenced a PCR consultation with WA gas retail participants to implement the Complete MIRN Listing facility on 29 August 2018. The Impact an Implementation Report (IIR) consultation with participants concluded on 12 November 2018.

AEMO made a submission to the Economic Regulation Authority (ERA) on 27 November 2018. The submission requested an approval from ERA by 25 January 2019.

ERA notified AEMO on 22 February 2019 of its decision to not approve the proposed implementation of IN004/18W Complete MIRN Listing (Version 1.0). Please refer below to ERA's assessment of the proposal and the reason for not approving it.

The following is an extract from section 1.2.4.3 of the ERA's Decision which covered Gas Retail Market Scheme Procedure Change Proposals IN002/18W, IN003/18W, IN004/18W and IN005/18W.

ERA's Assessment of Original IN004/18W Proposal

'The ERA also notes that, while the amendment in IN004/18W contains clauses requiring that the complete MIRN listing is accessed and used solely to confirm customer address and MIRN details, and that explicit informed consent is obtained from the customer, there is no requirement for audit of this process.

Without the need for audit of this process, as prescribed for other clauses requiring users to obtain explicit informed consent in the Retail Market Procedures, there is no regulatory oversight to ensure that there are no negative consequences for customers or that competition in the market is not adversely affected.

In approving an amendment to a retail market scheme, the ERA must be satisfied that if the amendment is made, the provisions of the scheme will comply with the Act and ensure that the retail gas market that is supplied through that system is regulated and operates in a manner that is open and competitive, efficient and fair to gas market participant and their customers. For the reasons set out above, the ERA is not satisfied that the requirements under the Act have been met for proposal IN004/18W.

Where an amendment to the scheme is submitted to the ERA, the ERA can approve it, request that it be changed and approve it in a changed form, or refuse to approve it. The ERA has chosen to refuse procedure change proposal IN004/18W in its current form.

Given the benefits of implementing access to users of a complete MIRN listing, the ERA requests that AEMO revisits the Retail Market Procedures to ensure that all customer protection mechanisms are updated to reflect the requirements in the new procedure 74A and that competition is safeguarded, before resubmitting the proposal to the ERA for approval.'

ERA did not raise any further matters in relation to IN004/18W.

Proposed Changes to Address Issues Raised by ERA

AEMO has amended the original proposal to include an audit requirement of customer Explicit Informed Consent (EIC) relating to accessing and using the Complete MIRN Listing.

Appendix A details the original changes proposed to Retail Market Procedures (RMP) WA and the additional changes proposed (shown in grey highlight) under this revised proposal.

PCR participant feedback timelines



Noting that there was broad support for the original proposal, this PCR invites stakeholders to provide feedback on the additional changes relating to an audit of IEC. As noted previously, these additional changes are shown in grey highlight.

Feedback is to be sent to grcf@aemo.com.au by COB 22 March 2019.

2. REFERENCE DOCUMENTATION

The following documentation is relevant to this consultation:

- Retail Market Procedures (WA).
- FRC B2B System Interface Definition.
- Specification Pack User Guide.
- The original consultation documents are available [here](#) on AEMO's website.
- The ERA Decision Notice is available [here](#) on ERA's website.

3. HIGH-LEVEL DETAILS OF THE CHANGE TO THE EXISTING PROCEDURES

This PCR consultation pack includes:

- A comparison of the existing operation of the Procedures to the proposed change to the operation of the Procedures, and
- A marked-up version of the Procedure change (see Attachment A).

The changes proposed by IN004/18W to the Complete MIRN Listing were previously detailed in the original IIR. In addition, the following additional changes are proposed:

- Insert the clause reference 74A to clauses 350(2) and Appendix 6(i) in Retail Market Procedures (WA).
- Amend the following text under the section 'Complete MIRN Listing (T299)' in FRC B2B System Interface Definition:

from,

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.

to,

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 irrespective of whether the data field is designated as O (optional) in the table for T299.

4. CONSEQUENCES FOR MAKING OR NOT MAKING THE CHANGE(S)

In addition to the details provided in the original PCR, this change will ensure that there is regulatory oversight to ensure that there are no negative consequences for customers, or that competition in the market is not adversely affected.

5. EXPLANATION REGARDING THE ORDER OF MAGNITUDE OF THE CHANGE(S) (EG: MATERIAL, NON-MATERIAL OR NON-SUBSTANTIAL)

There is no change to the order of magnitude of 'Non-Substantial' stated in the original IIR.



6. LIKELY BENEFITS FOR INDUSTRY AS A WHOLE

In addition to the details provided in the original PCR, this change will ensure provisions of the scheme will comply with the Act and ensure that the retail gas market that is supplied through that system is regulated and operates in a manner that is open and competitive, efficient and fair to gas market participant and their customers.

7. THE LIKELY IMPLEMENTATION EFFECT OF THE PROPOSAL ON INDUSTRY IN GENERAL AND/OR ANY IDENTIFIED PARTIES (E.G. END-USERS)

There is no change to the original likely implementation effect of the proposal stated in the original PCR.

8. TESTING REQUIREMENTS

AEMO's assessment of the additional changes set out in this PCR do not require any changes to the original testing scope. The original testing scope is:

- Network Operator generating the list and transferring to their existing designated folder on GRMS.
- AEMO's automated process transferring the list to all Retailers existing designated folders on GRMS
- Retailers confirming receipt of the list.

9. SUPPORTING DOCUMENTATION

Refer to the attachments to this PCR.

10. A PROPOSED EFFECTIVE DATE FOR THE PROPOSED CHANGED PROCEDURES TO TAKE EFFECT AND JUSTIFICATION FOR THAT TIMELINE

AEMO proposes the following consultation timeline:

- AEMO issues Procedure Change Request (PCR) 8 March 2019.
- PCR responses due to AEMO 22 March 2019.
- Impact and Implementation (IIR) issued 28 March 2019.
- IIR responses due to AEMO 18 April 2019.
- AEMO provides submission to ERA29 April 2019.
- Effective date – TBA.



ATTACHMENT A – DOCUMENTATION CHANGES (SEE SECTION 3)

Retail Market Procedures (WA)

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

Grey highlight represents additional changes to the original proposal.

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.

Part 7.2– Audit

350 Audit of explicit informed consent

- (1) There is no Clause 350(1).
- (2) For each calendar year, a user must appoint an auditor, having regard to clause 353, to undertake a *negative assurance audit* of the user's compliance during the year with clauses 55A, 72(1), 72(4), 74A, 79(1), 79(4), 166A and 349.



Appendix 6– Requirements for explicit informed consent

Requirements for explicit informed consent

A *customer's* consent will be *explicit informed consent* if the consent is given:

- (a) expressly; and
- (b) orally or in writing; and
- (c) after the *user* has in plain language appropriate to that *customer* disclosed all matters materially relevant to the giving of the consent, including each specific purpose for which the consent will be used; and
- (d) by a person competent or authorised to give it on the *customer's* behalf.

Records of explicit informed consent

A *user* must:

- (e) create a record of each *explicit informed consent* received.
- (f) *maintain* the record for a period of at least 2 years from the date of the *explicit informed consent*.
- (g) provide a copy of the record to *AEMO* within 10 *business days* after *AEMO* requests it.

A record under clause (e) must:

- (h) be in a form capable of examination by *AEMO* under clause 75 and of audit under clause 350;
- (i) include such information as enables *AEMO* or the auditor to verify the *user's* compliance with clauses 55A, 72(1), 72(4), [74A](#), 79(1), 79(4), 166A and 349 and this Appendix 6.



ATTACHMENT B – DOCUMENTATION CHANGES (SEE SECTION 3)

FRC B2B System Interface Definition

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

Grey highlight represents additional changes to the original proposal.

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.

Transaction number	Transaction Type Description	CSV File Name / e-Mail Subject Component Name
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
299	Complete MIRN Listing	distributor_ccyymmddhhmiss.zip
330	Notification of Planned Outage	SERVICERENEWAL
333	Meter Range Updates	METERRANGEUPDATE
	Interval Meter Data	INTERVALMETERDATA

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 \(T299\) \(For WA\)](#)

[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 irrespective of whether the data field is designated as O \(optional\) in the table for T299.](#)

[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>StreetName2</u>	<u>O</u>	
<u>StreetType1</u>	<u>O</u>	
<u>StreetType2</u>	<u>O</u>	
<u>StreetSuffix1</u>	<u>O</u>	
<u>StreetSuffix2</u>	<u>O</u>	
<u>PostalDeliveryType</u>	<u>O</u>	
<u>PostalDeliveryNumberPrefix</u>	<u>O</u>	
<u>PostalDeliveryNumberValue</u>	<u>O</u>	
<u>PostalDeliveryNumberSuffix</u>	<u>O</u>	
<u>SiteAddressCity</u>	<u>O</u>	
<u>SiteAddressState</u>	<u>O</u>	
<u>SiteAddressPostcode</u>	<u>O</u>	



<u>Transaction 299</u>		
<u>Heading/Column designator</u>	<u>Mandatory/Optional</u>	<u>Comment</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.