

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

(For AEMO to complete and administer)

<b>Procedure Change Number</b>	IN003/17W		
Impacted jurisdiction(s)	Western Australia		
Proponent	Alex Penter	Company	Kleenheat
Industry consultative forum(s) used	Procedure Change Committee ("PCC")	Date concluded by Procedure Change Committee ("PCC")	18 October 2017
Procedure change ranking (as per Chapter 9): <ul style="list-style-type: none"> <li>▪ Non-substantial</li> <li>▪ Low impact</li> <li>▪ High impact</li> </ul>	Low Impact		
Short description of change(s)	Amendments to identify previous retailer of transfer request		
Procedure(s) or documentation impacted	Retail Market Procedures (WA) ver 2.0 Specification Pack (SA/WA) SAWA Interface Control Document ver 4.6		
Summary of the change(s)	<p>Amend CATSNotification to include Participant id of current Market Participant (MP) in the transaction sent to MP who raised the transfer request and vice versa during the PEN and COM stages of the transfer process.</p> <p>Attachment A contains the revised clause 102 of the RMP and Attachment B contains amendments to section 8.1 of the SAWA Interface Control Document.</p> <p>This IIR has been prepared in accordance with clause 397 of the Retail Market Procedure (RMP) and is raised for consideration by gas retail market participants as a low impact procedure change. As per clause 399A (1) (a) (ii) AEMO now seeks submissions on the proposed changes which can be e-mail to <a href="mailto:pccwa@aemo.com.au">pccwa@aemo.com.au</a>.</p>		
I&IR prepared by	Nandu Datar	Approved by	Ruth Guest
Date IIR published	20 December 2017	Date consultation concludes	15 January 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			

## IMPACT & IMPLEMENTATION REPORT (WA) – DETAILED REPORT SECTION

### CRITICAL EXAMINATION OF PROPOSAL

<p>1. Description of change(s) and reasons for change(s)</p>	<p>The proposed changes contained in this IIR were developed by AEMO and raised for discussion as a Proposed Procedure Change (“PPC”) at the Procedure Change Committee (PCC) meeting on 18 October 2017. At that meeting, the PCC endorsed the proposed amendments as described in attachment A and B as a low impact procedure change and in accordance with clause 394(4) of the RMP (WA) recommends that AEMO accept the proposed changes.</p> <p><b>Reasons why the proposed changes are needed:</b></p> <p>Identification of the MP who has raised a request and the previous MP in customer transfer transactions.</p> <p>This information will enable MPs, who win a customer in error or mistakenly raise a customer transfer request, to rectify the transfer.</p> <p><b>Description of the proposed changes:</b></p> <p>Using the existing CATSNotification, AEMO systems will be modified to populate the Participant field in the transaction with:</p> <ul style="list-style-type: none"> <li>• the Participant id of the MP who raised the transfer for transactions sent to the current MP.</li> <li>• the Participant id of the current MP for transactions sent to the MP who raised the transfer request</li> </ul> <p>CATSNotifications sent during the following stages will contain the details as stated above</p> <ul style="list-style-type: none"> <li>• PEN</li> <li>• COM</li> </ul> <p>The detail in the CATSNotification sent to the Distributor is not changing.</p>
<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 2.0</p> <p>Specification Pack (SA/WA) SAWA Interface Control Document version 4.6</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>The precise amendments are detailed in Attachment A and B.</p>
<p>4. Explanation regarding the order of magnitude of the change (e.g. material, non-material or non-substantial)</p>	<p>AEMO's own assessment of the systems and process changes is that they are not complex and do not involve any aseXML schema changes. They are considered minor in nature.</p> <p>Market Participant's systems may also require changes. The magnitude of this change is yet to be determined however Market Participants agreed with AEMO's assessment that this change to be non-material.</p> <p>The impact of the proposed amendments as described in this PPC are considered by AEMO to be '<b>low impact</b>' because the amendments:</p> <ul style="list-style-type: none"> <li>• Do not materially impact the information technology systems of AEMO, participants, pipeline operators or prescribed persons;</li> <li>• Do not materially alter consumer protection mechanisms under the Procedures; and</li> <li>• Do not have a material commercial impact on AEMO, participants, pipeline operators or prescribed persons.</li> </ul>

ASSESSMENT OF LIKELY EFFECT OF PROPOSAL	
<p>5. Overall Industry cost/benefit analysis (tangible / intangible / risk) and/or cost estimates</p>	<p>AEMO will need to make IT system changes and recertify transactions impacted by this change. The overall cost to AEMO is approximately \$12,000. There is no ongoing cost associated with this proposal.</p> <p>AEMO considers that the likely benefits will result in:</p> <ul style="list-style-type: none"> <li>• Reduced labour and time in identifying the previous Market Participant for incorrectly transferred customers and savings related to avoiding ombudsman cases.</li> <li>• Improved communication between impacted Market Participants.</li> <li>• Reduction in delayed service response times currently experienced by customers and follow up customer queries.</li> <li>• ability to identify and make direct contact with relevant participant to follow an escalation process.</li> </ul>

<p>6. The likely effect of the change(s) on stakeholders (e.g. industry or end-users)</p>	<p>Minor changes to AEMO and Market Participants' systems in order to capture and distribute the required information.</p> <p>Market Participant's systems may also require changes. The magnitude of this change is yet to be determined however Market Participants agreed with AEMO's assessment that this change to be non-material.</p>
<p>7. Testing requirements</p>	<p>AEMO is required to test the system changes and perform recertification</p> <p>Market Participants will be required to test any system changes, recertify and participate in industry testing.</p>
<p>8. Consideration of the recommended Procedure change by AEMO under Rule 399.</p> <p>AEMO must either:</p> <ul style="list-style-type: none"> <li>▪ endorse the recommended Procedure change; or</li> <li>▪ reject the recommended Procedure change</li> </ul>	<p>In accordance with clause 394(5) AEMO has considered the proposed amendment and determined to accept the PCC recommendation. In accordance with clause 396(5) AEMO agrees with the PCC assessment that this change is a low impact procedure change.</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>At the meeting on 18 October 2017, the PCC discussed the PPC developed by AEMO that outlined the proposed amendments. The PCC unanimously agreed to recommend the proposed changes to AEMO as a low impact procedure change.</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 clause 378 to 402 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>

11. Should the proposed Procedure change be made, (with or without amendments)?	AEMO recommends that the proposed amendments as described in this IIR should be made without further amendments
12. If applicable, a proposed effective date for the proposed Procedure change(s) to take effect and justification for that timeline.	The proposed amendments are to be published in a new version 3.0 of the RMP and version 4.7 of the SAWA Interface Control Document that is targeted for an effective date of 30 April 2018.

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

## 102. Requirements for a transfer confirmation

A transfer confirmation must specify at least the following information:

- (a) the MIRN; ~~and~~
- (b) the transfer day;
- (c) in relation to the network operator and the current user, the GBO identification of the incoming user, and
- ~~(b)~~(d) in relation to the incoming user who delivered the transfer request to AEMO, the GBO identification of the current user.

## ATTACHMENT B – SPECIFICATION PACK CHANGES (SEE SECTION 3)

Note: The changes highlighted here already exist in the document Interface Control Document (ICD). The history change log for the ICD notes CR119 – IN012/11 Identify Previous FRO changes applicable to SA only.

### 8.1 Transfer and Change of Standing Data (Erroneous Transfer Correction)

The Transfer section of the [RMR] deals with the transfer of customers from one user (current user) to another user (incoming user). Since the customer is assigned a delivery point this is equivalent to transferring gas deliveries at a delivery point from the current user to the incoming user.

When looking for a candidate aseXML transaction to support a required Transfer logical flow the approach will be to try and re-use a suitable transaction from the CATS (CustomerTransfer) application. Where technically feasible this will be the CATS transaction as used in the Victorian gas market for a similar data exchange.

An ‘erroneous transfer correction’ is a request initiated by the user that was previously associated with a delivery point. This is a request to correct a transfer that may have occurred in error. The process that follows this request is precisely the same as that for a transfer.

Throughout this section reference is made to the ‘previous’ user. Such a user is conceptually the same as the incoming user, as referred to in the transfer process.

#### 8.1.8 CATSNotification Transaction – “PENDING” Variant

##### 8.1.8.1 Physical Transaction

##### *CATSNotification*

Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
Role	String(4) “USER” – User “NO” – Network operator	Mandatory	The role assigned to the recipient. Either: <ul style="list-style-type: none"> <li>“USER” or “NO” to support TFR-PEND-MI-NOTF</li> <li>“USER” or “NO” to support TFR-PEND-NOTF</li> <li></li> </ul>	1..1	Role	xsd:string xsd:maxLength =”4”

Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
RoleStatus	String(Enum) “N” = New (incoming) “C” = Current	Mandatory	For TFR-PEND-MI-NOTF, TFR-PEND-NOTF and ECNET-PEND-NOTF - “C” for the Network operator and Current User and “N” for the incoming user.	1..1	RoleStatus	Enumerated list of xsd:string “N”, ”C”



Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
Participant	String (10)	Mandatory	<p>If 'Role' = "NO" then:</p> <ul style="list-style-type: none"> <li>Contains the GBO Id of the incoming user that initiated the transfer when sent to the Network Operator.</li> </ul> <p>If 'Role' = "USER" or "ROLR" then:</p> <ul style="list-style-type: none"> <li><a href="#">(1) contains the GBO Id of the current user when sent to the incoming user that initiated the transfer</a>  <a href="#">(2) contains the GBO Id of the incoming user that initiated the transfer when sent to the current user</a>  <del>We do not communicate the incoming users identity to the current user. Set this to xsi:nil="true" in this case.</del></li> </ul>	1..1	ChangeRequest/Participant	xsd:string
RequestID	Numeric (10)	Mandatory	The unique ID assigned by the Market Operator to the Transfer Request or error correction	1..1	ChangeRequest/RequestID	xsd:positiveIntegermaxInclusive ="9999999999"

Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
ChangeStatusCode	String (4) REQ = Requested PEN = Pending OBJ = Objection COM = Completed CAN = Cancelled [SA ONLY CODES] RCA = RoLR Cancelled RCO = RoLR Completed	Mandatory	For TFR-PEND-MI-NOTF, TFR-PEND-NOTF and ECNET-PEND-NOTF:  Current status of the Change Request. In this case, "PEN"	1..1	ChangeRequest/ChangeStatusCode	xsd:string xsd:maxLength="4"
ChangeReasonCode	String (4) 0001 = Prospective transfer, in-situ 0002 = Prospective transfer, move in 0003 = Correction of Transfer	Mandatory	One of: <ul style="list-style-type: none"> <li>• "0002" (move in) to support TFR-PEND-MI-NOTF</li> <li>• "0001" to support TFR-PEND-NOTF</li> <li>• "0003" to support ECNET-PEND-NOTF</li> </ul>	1..1	ChangeRequest/ChangeData/ChangeReasonCode	xsd:string xsd:maxLength="4"

Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
ProposedDate	Date (10) Cyy-mm-dd	Mandatory	For TFR-PEND-NOTF and TFR-PEND-NOTF: The Earliest Change Date supplied in the original transfer request or error correction.  For ECNET-PEND-NOTF: The transfer date of the original transfer transaction to be corrected.	1..1	ChangeRequest/ChangeData/ProposedDate	xsd:date
NMI	String(10)	Mandatory	For TFR-PEND-NOTF and TFR-PEND-NOTF: The MIRN in the original Change Request  For ECNET-PEND-NOTF: The MIRN in the original transfer transaction to be corrected.	0..1	ChangeRequest/ChangeData/NMI	xsd:string length="10"
Checksum	Integer(1)	Mandatory	An attribute of NMI	use="optional"	@checksum	xsd:integer"minInclusive="0"maxInclusive="9"

#### 8.1.11 CATSNotification Transaction – “COMPLETED” Variant

##### 8.1.11.1 Physical Transaction

##### *CATSNotification*

Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
Role	String(4) “USER” – User “NO” – Network operator	Mandatory	The role assigned to the recipient. In this case either “USER” or “NO”	1..1	Role	xsd:string xsd:maxLength =”4”
RoleStatus	String(Enum) “N” = New (incoming) “C” = Current	Mandatory	For TFR-CONF-NOTF, “C” for the Network operator and Current User and “N” for the incoming user.  For ECNET-CONF-NOTF, “C” for the Network operator and Current User and for the Previous user “N”, since this user can be considered to be the incoming user in this process.	1..1	RoleStatus	Enumerated list of xsd:string “N”, “C”.

Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
Participant	String (10)	Mandatory	<p>For TFR-CONF-NOTF and ECNET-CONF-NOTF:</p> <ul style="list-style-type: none"> <li>contains the GBO Id of the incoming user that initiated the transfer when sent to the Network Operator.</li> </ul> <p><del>We do not communicate the incoming users identity to the current user. Set this to xsi:nil = "true".</del></p> <ul style="list-style-type: none"> <li><a href="#">(1) contains the GBO Id of the current user when sent to the incoming user that initiated the transfer</a></li> <li><a href="#">(2) contains the GBO Id of the incoming user that initiated the transfer when sent to the current user</a></li> </ul>	1..1	ChangeRequest/Participant	xsd:string
RequestID	Numeric (10)	Mandatory	The unique ID assigned by the Market Operator to the Transfer Request or error correction	1..1	ChangeRequest/RequestID	xsd:positiveIntegermaxInclusive = "9999999999"

Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
ChangeStatusCode	String (4) REQ = Requested PEN = Pending OBJ = Objection COM = Completed CAN = Cancelled [SA ONLY CODES] <u>RCA = RoLR Cancelled</u> <u>RCO = RoLR Completed</u>	Mandatory	Current status of the Change Request. In this case, "COM"  For accelerated transactions in a RoLR event, the allowable value is "RCO".	1..1	ChangeRequest/ChangeStatusCode	xsd:string xsd:maxLength="4"
ChangeReasonCode	String (4) 0001 = Prospective transfer, in-situ 0002 = Prospective transfer, move in 0003 = Correction of Transfer	Mandatory	Either: <ul style="list-style-type: none"> <li>"0001" or "0002" (for a move-in) to support TFR-CONF-NOTF</li> <li>"0003" to support ECNET-CONF-NOTF</li> </ul> It's value will be the same ChangeReasonCode from the original transfer request.	1..1	ChangeRequest/ChangeData/ChangeReasonCode	xsd:string xsd:maxLength="4"

Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
ActualChangeDate	Date (10) ccyy-mm-dd	<b>Mandatory</b> for TFR- CONF- NOTF  <b>Mandatory</b> for ECNET- CONF- NOTF	For a transfer, this is the date when the transfer completes. This is the meter read date provided by the network operator.  For error correction, this is the date when the transfer which is being corrected was completed.	1..1	ChangeRequest/ChangeData/ActualChangeDate	xsd:date
NMI	String(10)	Mandatory	The MIRN in the original Change Request	0..1	ChangeRequest/ChangeData/NMI	xsd:stringlength="10"
Checksum	Integer(1)	Mandatory	An attribute of NMI	use="optional"	@checksum	xsd:integer" minInclusive="0"maxInclusive="9"