

IMPACT IMPLEMENTATION REPORT (IIR)

Summary Section

Issue Number	IN004/18W		
Impacted Jurisdiction(s)	Western Australia		
Proponent	Nandu Datar	Company	AEMO
Affected Gas Market(s)	<ul style="list-style-type: none"> • Retail 	Consultation process (Ordinary or Expedited)	Ordinary
Industry Consultative forum(s) used	Gas Retail Consultative Forum (GRCF)	Date Industry Consultative forum(s) consultation concluded	Friday, 22 March 2019
Short Description of change(s)	Complete MIRN Listing – Version 2		
Procedure(s) or Documentation impacted	Retail Market Procedures (WA) ver 6.0		
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"> • The Network Operator to generate the complete MIRN list each month; • AEMO to provide the complete MIRN list to each registered Retailer in that market; and • The Retailer to ensure that they only access the complete MIRN list for the purpose of confirming a customer’s address and only when they have received the customer’s explicit informed consent <p>Include new clause 74A reference to clause 350(2) related to the audit of explicit informed consent.</p> <p>Include new clause 74A reference to Appendix 6(i) related to the verification of records of explicit informed consent held by retailers.</p> <p>Modify FRC B2B System Interface Definition to include new transaction type T299 (Complete MIRN Listing) in Appendix E – Non-Automated Electronic Files. In addition, include new content to describe the generation and transfer of the complete MIRN</p>		

listing and exchange process of the password protection of the complete MIRN listing.

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(1)(b) AEMO seeks submissions on the proposed changes.

I&IR Prepared By	Nandu Datar	Approved By	Michelle Norris
Date I&IR published	10 May 2019	Date Consultation under clause 383 or 384 concludes	7 June 2019
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IMPACT & IMPLEMENTATION REPORT

CRITICAL EXAMINATION OF THE PROPOSAL

1. DESCRIPTION AND REASONS FOR CHANGES

Original Proposal

AEMO first commenced a Procedure Change Request (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).

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 and the reason for not approving IN004/18W.

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.



IIR participant feedback timelines

Noting that there was broad support for the original proposal, this IIR invites stakeholders to provide feedback on the additional changes relating to an audit of EIC. As noted previously, these additional changes are shown in grey (changes from version 1 of the IIR) and yellow highlight (changes made as a result of feedback to the version 2 of the PCR consultation).

Anyone wishing to make a submission for this final stage consultation before AEMO submits the proposed changes to ERA are to use the response template that will be available on AEMO website when this IIR is published. Submissions close 7 June 2019 and should be emailed to grcf@aemo.com.au.

2. REFERENCE DOCUMENTATION

The following documentation is relevant to this consultation:

- Retail Market Procedures (WA) version 6.0.
- FRC B2B System Interface Definition.
- Specification Pack User Guide.
- The original consultation documents are available [here](#) on AEMO's website.
- The ERA Decision Notice document 'Decision on Gas Retail Market Scheme Procedure Change Proposals IN002/18W, IN003/18W, IN004/18W and IN005/18W' is available [here](#) on ERA's website.

3. HIGH LEVEL OVERVIEW OF THE CHANGES TO THE EXISTING PROCEDURES

This IIR 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. ORDER OF MAGNITUDE OF THE CHANGE

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



ASSESSMENT OF LIKELY EFFECT OF PROPOSAL

5. OVERALL INDUSTRY COSTS AND BENEFITS

In addition to the details provided in the original IIR, 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; and
- Efficient and fair to gas market participant and their customers.

6. IMPLEMENTATION IMPACTS

There is no change to the original likely implementation effect of the proposal stated in the original IIR, which included the following assessment.

Network Operator

- Substantially reduced resources for generating responses;
- One-off cost of developing the full MIRN discovery report and delivering it to AEMO; and
- The cost of sending a file to AEMO each month (can be automated).

Retailers

- Eliminate majority of wait time for MIRN discovery, allowing retailer resources to manage the next stage in the process directly; and
- Reduced resources in managing MIRN discovery and discovery failures for retailers.

Customers

- Improved customer service through reduced unnecessary contacts and faster retailer switches.

7. TESTING REQUIREMENTS

AEMO's assessment of the additional changes set out in this IIR (Attachment A and highlighted in grey) do not require any changes to the original testing scope. The original testing scope included the following three key elements:

- i. A Network Operator is to generate the MIRN list and transfer into their existing designated folder on Gas Retail Market System (GRMS).
- ii. AEMO's automated process is to transfer the MIRN list to all Retailers existing designated folders on GRMS.
- iii. Retailers to confirm receipt of the MIRN list.

8. AEMO'S PRELIMINARY ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH THE CLAUSE 378 OF THE RMP

There is no change to the original preliminary assessment of the proposal's compliance with the clause 378 of the RMP stated in the original IIR. This is summarised in the following table.



<p>Ensure that the retail gas market operates and is governed in a manner that is,</p> <ul style="list-style-type: none"> (i) open and competitive; (ii) efficient; and (iii) fair to participants and their customers 	<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 or their customers.</p>
<p>Ensure compliance with all applicable laws</p>	<p>AEMO's view is that the proposed changes are consistent with the applicable laws</p>
<p>Ensure effective consultation occurs and gives stakeholder's opportunities to provide feedback of the proposed changes</p>	<p>AEMO's view is that the stakeholders have already provided feedback to the PCR and are invited to provide additional feedback as part of this round of consultation</p>

9. CONSULTATION FORUM OUTCOMES

On 8 March 2019 AEMO published on its website a PCR that recommended minor documentation changes as described in Attachment A and B which included the additional changes highlighted in grey (changes from version 1 of the IIR). Registered participants and interested stakeholders were invited to make submissions which closed on 22 March 2019.

AEMO received submissions from Alinta, AGL, Kleenheat and ATCO supporting the proposal. ATCO proposed further amendments to Transaction 299. AEMO and ATCO discussed ATCO's feedback and have agreed on the revised wording for the amendment to Transaction 299.

The changes made after the PCR consultations are highlighted in yellow (changes made as a result of feedback to the version 2 of the PCR consultation) in Attachment A. AEMO discussed and responded to Kleenheat's feedback, which was accepted by Kleenheat. Please refer to Attachment C for all submissions and AEMO's responses to respondents. There are no dissenting views.

10. AUTHORISATION REVIEW

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.

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.

Changes to the RMP Chapters and ancillary deeds covered by the Authorisations must be assessed to determine whether the change impacts the Authorisation.

Because clauses 74A, 350 and Appendix 6 are provisions that are not part of Chapters 5 or 6 of the RMP or ancillary deeds covered by the Authorisations, a review of the ACCC Authorisations is not required.



RECOMMENDATIONS

11. SHOULD THE PROPOSED PROCEDURES BE MADE?

AEMO recommends that the changes as described in Attachments A and B of this IIR should be made with suggested amendments as described in Attachment C.

12. IF APPLICABLE, A PROPOSED EFFECTIVE DATE FOR THE PROPOSED CHANGES TO TAKE EFFECT AND JUSTIFICATION FOR THAT TIMELINE

The changes are to be published in a new version 7.0 of the RMP that is targeted for an effective date of September 2019, subject to receiving approval from ERA.



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.

Yellow highlight represents additional changes post the PCR consultation.

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 \(meter removed installed but delivery point is disconnected\). 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.](#)

ATTACHMENT C – SUBMISSIONS RECEIVED FOR PROCEDURE CHANGE REQUEST IN004/18W

Stakeholder	Clause/Section ref.	Issue/Comment	Proposed Text Red-Strikeout means Delete and <u>Blue Underline</u> means Insert	AEMO Response
Alinta	General comment	I have reviewed PCR IN004/18W – Complete MIRN Listing and agree with the amendments such that reference to new clause 74A is included in clause 350 and Appendix 6 so that clause 74A will be subject to the audit of explicit informed consent.		AEMO acknowledges Alinta’s support.
Kleenheat	RMP – 74A(c) and 350(2)	<p>AEMO has proposed to include a new clause 74A which, amongst other requirements, requires users under subclause (c) to ensure that the complete MIRN listing is accessed and used solely to confirm the relevant discovery address/MIRN details of the customer.</p> <p>Kleenheat fully supports the intention of subclause (c) however our concern is how it interacts with the EIC audit provision in cl. 350.</p> <p>Kleenheat would like to know how, in practice an auditor would be expected to audit retailers against cl. 74A(c)?</p>		<p>AEMO acknowledges Kleenheat’s feedback and provides the following response.</p> <p>Each Retailer is responsible for designing control mechanisms around accesses to the Complete MIRN Listing and an Auditor will review controls put in place by the Retailer to ensure their compliance with the Procedures.</p>

Stakeholder	Clause/Section ref.	Issue/Comment	Proposed Text Red-Strikeout means Delete and <u>Blue Underline</u> means Insert	AEMO Response
		At the very least Kleenheat would expect there to be some guidance around how compliance with subclause (c) would be assessed.		
Kleenheat	RMP - 350	<p>Kleenheat notes that there is currently no AEMO requirement to carry out an annual EIC audit in the RMPs in other States, for example, VIC.</p> <p>Kleenheat would like some clarity from AEMO as to how retailers in other states in Australia are being audited on their EIC requirements, especially in relation to the complete MIRN listing, and if it differs from the intended approach in WA, why this is the case.</p>		<p>AEMO acknowledges Kleenheat’s feedback and provides the following response.</p> <p>As per the Retail Market Procedures of VIC, QLD, SA and NSW/ACT the Retailers are not required to provide a report of annual EIC audit to AEMO. These Retailers may still be organising an internal audit of the EICs as a good compliance practice.</p>
AGL	RMP - 350(2)	Noted		AEMO acknowledges AGL’s support.
AGL	RMP - Appendix 6(i)	Noted		AEMO acknowledges AGL’s support.
AGL	FRC B2B System Interface Definition – Appendix E, Complete	Noted		AEMO acknowledges AGL’s support.

Stakeholder	Clause/Section ref.	Issue/Comment	Proposed Text Red-Strikeout means Delete and <u>Blue Underline</u> means Insert	AEMO Response
ATCO	MIRN Listing (T299) (For WA) FRC B2B System Interface Definition – Appendix E, Complete MIRN Listing (T299) (For WA)	Incorrect wording: “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 make available to Users <u>AEMO</u> 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 <u>installed but delivery point is disconnected</u>).	AEMO acknowledges ATCO’s feedback to the PCR and provides the following response. AEMO agrees to change from ‘meter removed’ to ‘meter installed but delivery point is disconnected’ as it adds further clarity. This minor change is highlighted in yellow in Attachment B. AEMO advises that the change from ‘Users’ to ‘AEMO’ be not made as the listing is made available to the Users. An automated process run by AEMO forwards the listing to registered users after it is received from the Network Operator. AEMO does not access this listing. ATCO has accepted AEMO’s response.