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| **IMPACT & IMPLEMENTATION REPORT – SUMMARY SECTION**  ***(For AEMO to complete and administer)*** |

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| **Issue Number** | IN017/13, IN039/12, IN008/14, IN003/14, IN002/14, IN004/14 and IN005/14 | | | | |
| Impacted  Jurisdiction (s) | VIC, NSW/ACT, QLD and SA | | | | |
| Proponent | Tim Sheridan | | Company | AEMO | |
| Affected Gas Markets(s) | Retail | | Consultation process (Ordinary or Expedited) | Expedited | |
| Industry Consultative forum(s) used | GRCF | | Date Industry Consultative forum(s)consultation concluded | 23 May 2014 | |
| Short Description of change(s) | Retail Market Procedure (RMP) Changes 2014 (Package 2) | | | | |
| Procedure(s) or Documentation impacted | Refer to artefacts listed in section 2 of this Impact and Implementation Report (I&IR) | | | | |
| Summary of the change(s) | The proposed amendments are non-material documentation only changes that remove redundant provisions and increase consistency in the RMPs and technical supporting documents for each of the retail gas markets. | | | | |
| I&IR Prepared By | Tim Sheridan | Approved By | | | Fiona Savage |
| Date I&IR published | 2 May 2014 | Date Consultation under 135EE or 135EF concludes | | | 23 May 2014 |
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| **IMPACT & IMPLEMENTATION REPORT –**  **DETAILED REPORT SECTION** | |
| **CRITICAL EXAMINATION OF PROPOSAL** | |
| 1. Description of change(s) and reasons for change(s) | The proposed changes in this IIR are based on a series of non-material amendments to the RMPs and technical protocol documents to enhance consistency between:   * Each of the jurisdictional RMPs; * The RMPs, the National Gas Law, and National Gas Rules; * The technical protocols in each jurisdiction (e.g. Gas Interface Protocol (GIP) and Specification Pack).   AEMO’s long term objective is to enhance consistency between the regulatory frameworks for all retail gas markets. The proposed changes in this IIR remove redundant provisions and increase consistency in the RMPs and technical supporting documents for each of the gas retail markets.  The proposed effective date for these changes is **1 July 2014**.  In summary, proposed changes are as follows:   1. **IN028/13 (Harmonising of Audit Provisions)**   This is a documentation only change to the provisions relating to market audits in the RMPs for each jurisdiction.  The purpose of this change is to simplify and align the audit provisions in each of the gas retail markets.  Refer to **Attachment A** for the marked-up amendments associated with this change.   1. **IN017/13 (Service Order Road Map Amendments)**   This is a documentation only change. The RBPWG was assigned the task of developing the methodology and timetable for standardisation of business processes. A ‘Top 3’ list was agreed, which included Service Orders and the objective of the review was to:   * Identify if business processes are currently aligned across VIC, QLD and SA retail gas markets; * Assess whether there are inconsistencies that can be addressed over time; and * Identify any documentation changes required to match the existing business practice associated with the business process   The Service Order review concluded in February 2014. The key findings of the review revealed:   1. The process between VIC, QLD and SA at a high level was largely consistent; 2. The documentation supporting these processes varied slightly. The workshop recommended consistent wording where possible; 3. The SA Service Order process flows contain more detail and it was recommended that this level of detail should be implemented across other jurisdiction with minor amendments; and 4. The process flow stencil used to depicted electricity process flow was the preferred stencil.   Using the information obtained during the workshops, AEMO has made proposed amendments to the GIP and Specification Pack documents that reflected the decisions made by the RBPWG.  Refer to **Attachment B** for the marked-up RMP amendments associated with this change.   1. **IN039/12 (MHA and MRT Service Orders)**   This is a documentation only change to establish a single industry agreed process in VIC, QLD and SA for the management of meter high account compliant (MHA) and meter retake and test (MRT) service requests/responses.  The purpose of this change is to eliminate duplicate processes and confusion for how MHA and MRT service orders are raised and responded to in these jurisdictions.  Refer to **Attachment C** for the marked-up amendments associated with this change.   1. **IN008/14 (Error Correction Changes)**   This is a documentation only change to remove ambiguity in the wording of the RMP-NA clause 11.5(2) and 11.5(3). This change would align the business process with the clause wording where all the impacted parties are notified of a cancellation of an error correction transaction, i.e. the current user, relevant network operator and, in the case of a correction to a change of user transaction, the previous user.  Refer to **Attachment D** for the marked-up amendments associated with this change.   1. **IN003/14 (NSW/ACT Gas Interface Protocol)**   This is documentation only change for the introduction of a GIP in NSW/ACT.  The purpose of this administrative change is to establish a framework for organising all technical supporting documents in one location for NSW/ACT and to use consistent wording across jurisdictions. This change would make it easier for participants to locate technical documentation relevant for each jurisdiction, if consistent terminology is used. Initially the NSW/ACT GIP would include the current GRMBS Interface Control Document (ICD). AEMO’s intention is to expand the GIP in future to include the relevant Build Packs and other associated documentation, with the proposed move to structured business to business (B2B) system processes and protocols in NSW/ACT, as and when these changes are implemented.  Refer to **Attachment E** for the marked-up amendments associated with this change.   1. **IN002/14 – Specification Pack Update for T900 File**   This is a documentation only change to specify the file format that is to be used for the T900 file referred to in the FRC System Interface Definitions in SA.  The purpose of this change is the remove any confusion relating to the RoLR provisions of the T900 file in SA.  Refer to **Attachment F** for the marked-up amendments associated with this change.   1. **IN004/14 (Build Pack Change to Remove Standard for Process Flows)**   This is a documentation only change to all of the RMPs in each jurisdiction.  The decision by industry to adopt the electricity process flow stencil for the Service Order diagrams has resulted in the UML Activity diagram notation stencil being superseded. As a result it is proposed to remove reference to the UML legend from the Usage Guide.  Refer to **Attachment G** for the marked-up amendments associated with this change   1. **IN025/13 (Removal of Obligation to Publish SA Profiling Guideline)**   This is a documentation only change to the RMP-S to remove a redundant provision (clause 209(2)) which requires AEMO to publish a guideline that sets out the principles on which profiled pipeline nominations and profiled sub-network nominations are calculated.  The purpose of this change is to remove a redundant provision that requires AEMO to publish a guideline that provides no value to participants.  Refer to **Attachment H** for the marked-up amendments associated with this change.   1. **IN005/14 (VIC Customer Characterisation Reference)**   This is a documentation only change to the definition of ‘customer characterisation’ in the RMP-V.  The purpose of this change is to update the reference to the VIC Government agency that is responsible for maintaining the list of municipal boundaries in Melbourne.  Refer to **Attachment I** for the marked-up amendments associated with this change.   1. **IN009/14 (SA Disconnection by User)**   This is a documentation only change to remove a redundant provision (clause 111) in the RMP-S which allows a User to disconnect a basic meter, and makes provision for the User to take a disconnection meter read and provide it to the network operator.  In 2009, similar clauses allowing disconnection by the User were removed from the RMPs in VIC and QLD. However, these provisions were retained in SA.  Currently, Envestra’s Access Arrangement does not permit a User to perform disconnection of a basic meter.  Furthermore, the *Gas Act 1997* in SA prohibits a User from disconnecting a basic meter (see sections 51 and 81 below).  Section 51 states that proper authority to disconnect a gas supply is required:  **51—Entry to disconnect supply**  If a gas officer has proper authority to disconnect a gas supply to a place, the gas officer may, at any reasonable time, enter and remain in the place to disconnect the gas supply to the place.  Section 81 covers unlawful disconnection without proper authority:  **81—Unlawful interference with distribution system or gas installation**  A person must not, without proper authority—  (a) attach a gas installation or other thing, or make any connection, to a distribution system; or  (b) disconnect or interfere with a supply of gas from a distribution system; or  (c) damage or interfere with gas infrastructure or a gas installation in any other way.  Maximum penalty: $10 000 or imprisonment for 2 years.  It should also be noted that under Part 6 of the National Energy Retail Rules (NERR), retailers can only ‘arrange’ for a disconnection, and they cannot perform this work themselves.  Therefore, Envestra proposes that clause 111 is removed from RMP-S in its entirety. Refer to **Attachment J** for the marked-up amendments associated with this change.  **In relation to the following changes:**   * **IN028/13 (Harmonising of Audit Provisions);** * **IN025/13 (Removal of Obligation to Publish SA Profiling Guideline); and** * **IN009/14 (SA Disconnection by User)**   **AEMO has decided to extend the time period of consultation. As a result, these changes will be moved into a separate procedure change package.**  **See section 9 for further details.** |
| 2. Reference documentation   * Procedure Reference * GIP/Specification Pack Reference * Other Reference | * RMPs for VIC, QLD and NSW/ACT * Participant Build Pack 1:   + Process Flow Diagrams   + Process Flow Table of Transactions * Participant Build Pack 3:   + B2B System Interface Definitions * SA/WA Information Pack:   + B2B Process Flows |
| 3. The high level details of the change(s) to the existing Procedures  This includes:   * A comparison of the existing operation of the Procedures to the proposed change to the operation of the Procedures * A marked up version of the Procedure change | As noted in section 1, the proposed amendments in this IIR are documentation only changes that increase consistency and remove redundant provisions in the RMPs and technical supporting documents for each of the gas retail markets. |
| 4. Explanation regarding the order of magnitude of the change  (eg: material, non-material or non-substantial) | These changes are non-material as they are documentation changes only. |

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| **ASSESSMENT OF LIKELY EFFECT OF PROPOSAL** | |
| 5. Overall Industry Cost / benefit (tangible / intangible / risk) analysis and/or cost estimates | As prescribed in the “Approved Process”, registered participants and interested stakeholders were requested to complete submissions to the PPC. Submissions closed on 16 April 2014. AEMO received submissions from AGL, Alinta, Energy Australia, Envestra, Lumo and Origin.  Using the Gas Retail Consultative Forum (GRCF) participants and stakeholders were asked to complete and submit Stakeholder Assessment Forms (SAFs) to provide AEMO with cost benefit data that AEMO will use, in summarised form, to develop the IIR.  In terms of costs, no Participant submitted a SAF. AEMO did receive feedback on the proposed changes and none of the comments raised any concerns in relation to any cost impacts to industry. AEMO has therefore concluded that there are no Participant costs for implementing any of the proposed changes.  For AEMO, these are documentation changes only and therefore there are no costs to implement.  In terms of benefits, there are no tangible benefits. However, the following intangible benefits are likely to be realised:   * Harmonisation and greater consistency within the retail gas regulatory framework. * A platform for future convergence of gas markets. * Improved clarity of RMPs and greater understanding of what arrangements apply in each jurisdiction. * The removal of redundant provisions with the RMPs. |
| 6. The likely implementation effect of the change(s) on stakeholders (e.g. Industry or end-users) | The implementation effect of this change enhances consistency between the regulatory frameworks for all retail gas markets. These changes support simplifying the RMPs by removing redundant provisions and introducing consistent administrative arrangements for a number of AEMO’s functions. |
| 7. Testing requirements | Nil. |
| 8. AEMO's preliminary assessment of the proposal's compliance with section 135EB:  - consistency with NGL and NGR,  - regard to national gas objective  - regard to any applicable access arrangements | Consistency with NGL and NGR:  AEMO’s view is that the proposed changes are consistent with the NGL and NGR. The proposed changes promote clarity and consistency across four jurisdictions.  National gas objective  *"Promote efficient investment in, and efficient operation and use of, natural gas services for the long term interests of consumers of natural gas with respect to price, quality, safety, reliability and security of supply of natural gas."*  It is AEMO's view that each of the proposed changes will assist to facilitate the efficient operation of each of the retail gas markets, and are in the long-term interests of consumers as it promotes clarity and consistency.  Applicable access arrangements  With the exception of the proposed changes in IN009/14 (SA Deregistration by User), AEMO’s view is that the proposed changes are not in conflict with existing Access Arrangements. No Distributor raised concerns with the proposed amendments in relation to their Access Arrangement. |
| 9. Consultation Forum Outcomes  (e.g. the conclusions made on the change(s) whether there was unanimous approval, any dissenting views) | On 11 March 2014, AEMO circulated a draft copy of the Proposed Procedure Changes (PPC) to the GRCF for review. Submissions to the draft PPC closed on 28 March 2014. AEMO received comments from AGL, Energy Australia, Envestra, Jemena, Lumo, Multinet and Origin Energy.  AEMO made changes to the PPC based on this initial feedback from participants, and on 2 April 2014, AEMO published the PPC for consultation under the Approved Process.  Submissions to the PPC closed on 16 April 2014. AEMO received comments from AGL, Alinta Energy, Energy Australia, Envestra, Lumo, and Origin Energy.  *Note: on 7 April 2014, AEMO facilitated a teleconference with the GRCF to discuss the proposed changes for IN009/14 (SA Disconnection by User).*  Participants supported the majority of the proposed changes.  **IN017/13 (Service Order Road Map Amendments)**  Feedback was received that provided suggested further minor changes that, in AEMO’s opinion, added further clarity to the proposed changes. AEMO has decided to update the original proposed changes that were contained in the PPC. In summary the further changes are:  *Participant Build Pack 1 – Process Flow Diagrams (Version 3.4)*   * + Delete the SA cross reference (MIRN1.1 Part 1) in VIC diagram 103.   *SA/WA Information Pack – B2B Process Flows (Version 3.4)*   * + Add the drawing convention to the introduction section,   + Reword the heading on diagram PF (B2B) MIRN 1 New Connection – Service Connections   + Delete VIC cross reference in diagram MIRN 1.1 Part 1.   + Delete the word “only” from the heading on the following diagrams     - PF(B2B) – MR7A – Address Change from User (WA)     - PF(B2B) – MR7A – Address Change from User (WA)     - PF(B2B) –REQ5A Service Order General (WA)     - REQ5B Det – Service Order Transaction Table     - PF(B2B) –REQ6B DB Varied Service Orders (WA)   + Delete the word “Required” from the heading on the diagram Process Flow REQ7: Retailer Initial Service Orders Cancellation   Several issues were raised regarding the proposed changes for IN028/13 (Harmonisation of Audit Provisions), IN025/13 (Removal of Obligation to Publish SA Profiling Guideline) and IN009/14 (SA Deregistration by User).  Below is a summary of the participant feedback received by AEMO to each of these proposed changes.  **IN028/13 (Harmonisation of Audit Provisions)**  AGL and Lumo questioned the basis for conducting biannual audit reviews across each of the retail gas markets and indicated that this is not consistent with the wholesale requirements which require annual audit reviews.  AGL noted that the proposed changes were previously consulted on in March 2012 and that previously it was proposed that audit reviews be conducted annually. AGL indicated that there is no basis for adopting biannual reviews and that AEMO needs to provide an understanding on its change in position since 2012.  AGL noted that previously, the term “delivery point registry” was a defined term in the audit provisions for NSW/ACT and that where “Participant” is not a defined term, AEMO has not proposed the introduction of a new term. AGL suggested the proposed drafting be reviewed to correctly reflect the defined terms for each jurisdiction, or that new definitions be created that are common to each jurisdiction.  AGL noted that in SA the current timeframe to obtain the auditor’s final report is 3 months after the end of period to which the audit relates. AGL requested the same timeframe be adopted across all jurisdictions.  Lumo indicated that in the interests of transparency, audit reports should be published to industry rather than provided to participants on request.  Finally, AGL and Lumo suggested a requirement be added to the proposed changes for the auditor to consider AEMO’s compliance with the audit clause.  **IN025/13 (Removal of Obligation to Publish SA Profiling Guideline)**  AGL and Lumo did not support the proposed change.  Lumo indicated that clause 209(2) should being retained in the event that another sub-network is established in SA. If this were to occur, then AEMO would be required determine the necessary profiles for this new sub-network. Therefore, AEMO should publish the guideline outlining the process for how it prepares these profiles.  AGL sought confirmation on whether AEMO has developed and published a policy on the retention and management of profiles referred to in clause 209(2)(c).  **IN009/14 (SA Deregistration by User)**  AEMO received comments from AGL, Envestra and Alinta Energy to the proposed change.  AGL indicated that it did not support the proposed change for the following reasons:   * Not all aspects of the retailer’s and distributor’s obligations are established in the RMP’s or the distributor’s Access Arrangements. There is a hierarchy of retailer and distributor obligations (i.e. the SA Gas Act 1997, the NGL, the NGR, the NERR, distributor’s Access Arrangements and retail and distribution licensing arrangements). * The RMP’s should align to the distributor’s Access Arrangement and the Gas Act. Part 4 Division 1 if the Gas Act does permit disconnection to occur by a retailer, stating that ‘a gas entity, subject to conditions determined by the Minister, may appoint a gas officer’. If the Minister were to determine the accreditation criteria for an alternative service provider, then the NERR would support this process. * AGL’s view is that Industry has not undertaken due diligence in assessing this change as being a redundant provision in the RMPs. * The retention of clause 111 would ensure that the RMPs align to the Gas Act. Therefore, AGL does not consider clause 111 to be a redundant provision within the RMPs. Nor does AGL consider the removal of clause 111 as a non-material change to the RMP.   Alinta Energy indicated it did not oppose the proposed change. However, Alinta Energy did raise the following issues:   * The proposed change appears to have been fast tracked and the shortened period of consultation and limited supporting information is a concern, particularly in terms of creating a precedent for future reviews. * The proposed change creates a potential divergence between the RMP and the SA Gas Act 1997 which in certain circumstances allows the appointing of a “Gas Officer” allowing a retailer self-managed disconnections . Consideration should be given in terms of the overriding legislation that governs relevant activities and ensuring the RMP is aligned to this. * There are questions around the need for the proposed change at this time. In practice the existing provisions are not currently being utilised by retailers, and hence not creating a significant issue. * The proposed change will enshrine the monopoly position by the networks in carrying out disconnection services. Whilst in theory this is not a significant issue, retailers do bear the financial risk when a disconnection service is not completed or carried out within the required timeframe.   Envestra indicated that it supported the proposed change for following reasons:   * Envestra has a blanket national policy of not allowing any other party to physically interfere with any of its meters. * There is currently no law or contract that permits a User to perform disconnections of basic meters in SA. The Envestra Access Arrangement has no provision for this. The Gas Act 1997 prohibits this by limiting the parties which have proper authority to do so. * If a retailer were to seek to obtain proper authority to undertake disconnections by relying on the Gas Act, subject to conditions determined by the Minister, both of ESCOSA and the Office of the Technical Regulator would need to endorse the proposal. Envestra would oppose any such proposal and believes that it would be highly unlikely to be approved. * Envestra acknowledges that within the NSW/ACT RMPs there is a clause which allows disconnection by User. There is also a clause in Jemena’s Access Arrangement Reference Services Agreement under which…’The User may enter into an agreement with the Service Provider (Jemena) to permit the User to perform disconnections…’. There is no such clause in Envestra’s Access Arrangement for the Wagga networks however, and there are no agreements in place.   AEMO notes the feedback received from participants to the proposed changes for IN028/13, IN025/13 and IN009/14. In light of this feedback, AEMO considers that more time is required to consider to the issues raised by participants.  Therefore, in accordance with Rule 135EG of the NGR, AEMO has decided to extend the time limit for consultation on the proposed changes for IN028/13, IN025/13 and IN009/14. AEMO will now publish the IIR for these proposed changes by 29 August 2014.  The target effective date for these three proposed changes is still to be determined and will be detailed in the IIR. The time extension notice for these proposed changes will be published by AEMO on 9 May 2014.  AEMO intends to continue the consultation for the remaining procedure changes contained in the RMP Changes 2014 (Package 2) and the proposed effective date of 1 July 2014 remains unchanged. |

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| **RECOMMENDATION(S)** | |
| 10. Should the proposed Procedures be made, (with or without amendments)? | AEMO recommends that the changes be made as drafted for the procedure changes for:   * IN017/13 (Service Order Road Map Amendments) * IN039/12 (MHA and MRT Service Orders) * IN008/14 (Error Correction Changes) * IN003/14 (NSW/ACT Gas Interface Protocol) * IN002/14 (Specification Pack Update for T900 File) * IN004/14 (Build Pack Change to Remove Standard for Process Flows) * IN005/14 (VIC Customer Characterisation Reference)   The proposed effective date for these changes is 1 July 2014.  As noted in section 9, AEMO recommends a n extension of time to consult on the proposed changes for:   * IN028/13 (Harmonisation of Audit Provisions) * IN025/13 (Removal of Obligation to Publish SA Profiling Guideline) * IN009/14 (SA Disconnection by User).   This time extension is required to fully consider to the issues that have been raised by participants. AEMO now intends to publish the IIR on the proposed changes for IN028/13, IN025/13 and IN009/14 by 29 August 2014. |
| 11. If applicable, a proposed effective date for the proposed change(s) to take effect and justification for that timeline. | With exception of IN028/13, IN025/13 and IN009/14, AEMO proposes an effective date of 1 July 2014 for the proposed changes. |

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| **ATTACHMENT A – PROPOSED RETAIL MARKET PROCEDURE CHANGES**  **IN028/13 – Harmonisation of Audit Provisions**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

**Extract from Version 12.0 of the RMP-N/A**

**Amend the definitions in clause 1.3 as follows:**

***review*** means an examination in accordance with the standard (as varied from time to time) for a review specified in Auditing Standard ASAE 3000 (Explanatory Framework for Standards on Audit and Audit Related Services) prepared by the Auditing and Assurance Standards Board of the Australian Accounting Research Foundation.

**Amend clause 38 as follows:**

**38. AUDIT OF AEMO'S FUNCTIONS UNDER THE PROCEDURES**

**38.1 There is no clause 38.1.**

**38.2 There is no clause 38.2.**

**38.3 There is no clause 38.3.**

**38.4 There is no clause 38.4.**

**38.5 Market Audit**

1. AEMO must undertake a *Review* at least every two years.
2. In undertaking a *Review*, AEMO must appoint a Market Auditor who in AEMO’s reasonable opinion is independent and suitably qualified to conduct a *Review*.

(c) A *Review* must examine compliance by AEMOwith its processes and the effectiveness and appropriateness of systems utilised in the operation of any activities as set out in or contemplated by the *Procedures*,including but not limited to:

(i) AEMO's compliance processes and compliance with the *Procedures*;

(ii) IT Controls, including software management and business continuity;

(iii) integrity of the AEMOmeter register;

(iv) profiling and allocation processes and systems; and

(v) retail billing and information systems.

(d) AEMO will determine, in consultation with participants, the extent and scope of the *Review* to be undertaken.

(e) AEMOmust ensure that the person who conducts the *Review* prepares a report in which the results of the *Review* are set out.

(f) The report prepared by the Market Auditor in accordance with clause (e) must be made available by AEMO to Participants on request.

**Extract from Version 7.0 of the RMP-V**

**Amend the definitions in clause 1.1.1 as follows:**

***review*** means an examination in accordance with the standard (as varied from time to time) for a review specified in Auditing Standard ASAE 3000 (Explanatory Framework for Standards on Audit and Audit Related Services) prepared by the Auditing and Assurance Standards Board of the Australian Accounting Research Foundation.

## 1.7 Market Audit

1. AEMO must undertake a *Review* at least every two years.
2. In undertaking a *Review*, AEMO must appoint a Market Auditor who in AEMO’s reasonable opinion is independent and suitably qualified to conduct a *Review*.

(c) A *Review* must examine compliance by AEMOwith its processes and the effectiveness and appropriateness of systems utilised in the operation of any activities as set out in or contemplated by the *Procedures*,including but not limited to:

(i) AEMO's compliance processes and compliance with the *Procedures*;

(ii) IT Controls, including software management and business continuity;

(iii) integrity of the AEMOmeter register;

(iv) profiling and allocation processes and systems; and

(v) retail billing and information systems.

(d) AEMO will determine, in consultation with participants, the extent and scope of the *Review* to be undertaken.

(e) AEMOmust ensure that the person who conducts the *Review* prepares a report in which the results of the *Review* are set out.

(f) The report prepared by the Market Auditor in accordance with clause (e) must be made available by AEMO to Participants on request.

**Extract from Version 9.0 of the RMP-Q**

**Amend the definitions in clause 1.1.1 as follows:**

*Review*Means an examination in accordance with the standard (as varied from time to time) for a review specified in Auditing Standard ASAE 3000 (Explanatory Framework for standards on Audit and Audit Related Services) prepared by the Auditing and Assurance Standards Board of the Australian Accounting Research Foundation.

**1.7 Market audit**

(a) *AEMO* must undertake a *Review* at least every two years.

(b) In undertaking a *Review*, *AEMO* must appoint a Market Auditor who in *AEMO’s* reasonable opinion is independent and suitably qualified to conduct the required *Review*.

(c) A *Review* must examine compliance by *AEMO* with its processes and the effectiveness and appropriateness of systems utilised in the operation of any activities as set out in or contemplated by the *Procedures*, including but not limited to:

1. *AEMO's* compliance processes and compliance with the *Procedures*;
2. IT Controls, including software management and business continuity;
3. integrity of the *AEMO* meter register;
4. profiling processes and systems; and
5. retail billing and information systems.

(d) *AEMO* will determine, in consultation with participants, the extent and scope of the *Review* to be undertaken.

(e) *AEMO* must ensure that the person who conducts the *Review* prepares a report in which the results of the Review are set out.

(f) The report prepared by the Market Auditor in accordance with clause 1.7(e) must be made available by *AEMO* to *Participants* on request.

**Extract from Version 6.0 of the RMP-S**

**Amend the definitions in clause 2 as follows:**

**“review”** means an examination in accordance with the standard (as varied from time to time) for a review specified in Auditing Standard ASAE 3000 (Explanatory Framework for Standards on Audit and Audit Related Services) prepared by the Auditing and Assurance Standards Board of the Australian Accounting Research Foundation.

**Part 7.2– Audit**

**350. There is no clause 350.**

**351. Market audit**

1. AEMO must undertake a *Review* at least every two years.
2. In undertaking a *Review*, AEMO must appoint a Market Auditor who in AEMO’s reasonable opinion is independent and suitably qualified to conduct a *Review*.
3. A *Review* must examine compliance by AEMOwith its processes and the effectiveness and appropriateness of systems utilised in the operation of any activities as set out in or contemplated by the *Procedures*,including but not limited to:
4. AEMO's compliance processes and compliance with the *Procedures*;
5. IT Controls, including software management and business continuity;
6. integrity of the AEMOmeter register;
7. profiling and allocation processes and systems; and
8. retail billing and information systems.
9. AEMO will determine, in consultation with participants, the extent and scope of the *Review* to be undertaken.
10. AEMOmust ensure that the person who conducts the *Review* prepares a report in which the results of the *Review* are set out.
11. The report prepared by the Market Auditor in accordance with clause (e) must be made available by AEMO to Participants on request.

**352. There is no clause 352.**

**353. There is no clause 353.**

**354. There is no clause 354.**

**355. There is no clause 355.**

**356. There is no clause 356.**

**357. There is no clause 357.**

**358. There is no clause 358.**

**359. There is no clause 359.**

**360. There is no clause 360.**

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| **ATTACHMENT B – RETAIL MARKET PROCEDURE CHANGES**  **IN017/13 – Service Order Road Map Amendments**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

Below is a summary of the proposed changes to the GIP documents for VIC and QLD based Service Order Process Flow updates as agreed by the RBPWG.

Attached separately to this document are draft versions of the GIP documents which show the proposed amendments in track change mode.

**Participant Build Pack 1 – Process Flow Diagrams (Version 3.4)**

In summary, the changes are:

* Delete the existing Service Order Process Flow for diagrams 5.1 to 5.5, 99.3 and 99.4
* Add new Service Order Process Flow diagrams 100 to 107.

<See Attachment B1 for a marked-up copy Process Flow Diagrams v3.4 >

**Participant Build Pack 1 - Process Flow Table of Transactions (Version 3.3)**

In summary, the changes are:

* Updating the Process Flow reference column to reflect the new Process Flow diagram numbers.
* Add the new Interval Downgrade to Basic transactions (ref# 127 to 131)
* Add a new column that maps the Transaction id to the section of the Interface Definition document for the Service Order transactions.
* Replace the existing Job Enquiry Code tab with new Job Enquiry Code tab that is the same as the SA Job Enquiry Code tab.

Note: the changes in dot points 1 to 3 have been highlighted in yellow to show the update changes only.

<See Attachment B2 for a marked-up copy Process Flow Table of Transactions v3.3 >

**Participant Build Pack 3 – B2B System Interface Definitions (Version 3.4)**

In summary, the changes are:

* Delete the existing Service Order Process Flow for diagrams in section 4.2.2 and add the new diagram and reference to the Process Flow Diagram in PBP1.

<See Attachment B3 for a marked-up copy B2B System Interface Definitions v3.4 >

**SA/WA Information Pack – B2B Process Flows (Version 3.4)**

Attached separately to this document are the proposed changes to the B2B Process Flows for SA (a document contained in the Information Pack) based on the Service Order Process Flow updates as agreed by the RBPWG.

<See Attachment B4 for a marked-up copy B2B Process Flows v3.4>

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| **ATTACHMENT C – PROPOSED RETAIL MARKET PROCEDURE CHANGES**  **IN039/12 – MHA and MRT Service Orders**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

**Extract from Participant Build Pack 1: Process Flow Table of Transactions (Version 3.2); List of Job Enquiry Codes**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| MHA | Meter High Account Complaint | "Used to conduct a high account investigation i.e.: meter tested to see if falls within allowable limits.  NOTE: REQUIRE'S INDUSTRY AGREED MHA/MRT REQUEST TEMPLATE TO BE SENT TO DISTRIBUTOR IN CONJUCTION WITH SERVICE ORDER REQUEST  NOTE: APA/ENVESTRA REMOVE THE METER FOR TESTING UPON RECEIPT OF MHA REQUEST. APPLIES IN ALL JURISDICTIONS. The meter being tested is NOT returned to the property after testing. | K | M | Current FRO |
| MRT | Meter Retake and Test | Used to conduct a high account investigation i.e.: meter tested to see if it falls within allowable limits. Meter taken away for lab test.  A new meter will be installed to allow the existing meter to be laboratory tested. The meter being tested is NOT returned to the property after testing.  NOTE: REQUIRE'S INDUSTRY AGREED MHA/MRT REQUEST TEMPLATE TO BE SENT TO DISTRIBUTOR IN CONJUCTION WITH SERVICE ORDER REQUEST | K | M | Current FRO |

**Extract from Participant Build Pack 1: Process Flow Table of Transactions (Version 3.2); Process Flow Tables**



**Extract from Specification Pack: Version 3.6 of the FRC B2B System Interface Definitions**

**Amendment Appendix F (Unstructured Transactions) as follows:**

The following transactions have been identified for the process of a user advising a network operator to undertake a Meter High Accounts (MHAs) or Meter Retake and Test (MRT) investigation.

This Unstructured Transaction is in addition to the B2B Service Order Request MHA or MRT.

|  |  |
| --- | --- |
| **Transaction number** | **Transaction Type Description** |
| 357 | Meter High Accounts (MHAs) or Meter Retake and Test (MRT) Investigation, Initiate Request |

The format of this transaction is via e-mail or fax using a standard form called “MHA / MRT Request Template” which is published on the AEMO website.

The following transactions have been identified for the process of a network operator advising a user of the outcome of a Meter High Accounts (MHAs) or Meter Retake and Test (MRT) investigation.

|  |  |
| --- | --- |
| **Transaction number** | **Transaction Type Description** |
| 358 | Meter High Accounts (MHAs) or Meter Retake and Test (MRT) Investigation Report |

The format of this transaction is via e-mail or fax using a standard form called “MHA / MRT Request Template” which is published on the AEMO website.

**MHA / MRT Request template**

For completeness embedded in this document is the MHA/MRT Field Investigation Repot template that is to be used.



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| **ATTACHMENT D – PROPOSED RETAIL MARKET PROCEDURE CHANGES**  **IN008/14 – Error Correction Changes**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

**Extract from Version 12.0 of the RMP-N/A**

**Amend clause 11.5(3) as follows:**

## 11.5 Objection data to be addressed

By day +4, the *current user* must address each objection with the objectingparticipant and either:

(1) the objecting participant must notify AEMO that it withdraws the objection and AEMO must:

(a) if an objection withdrawal made under **clause 11.5(1)** is valid, *acknowledge* to the objecting participant and notify the *current user*; or

(b) if an objection withdrawal made under **clause 11.5(1)** is not valid, *acknowledge* to the objectingparticipant, informing them of the reason why the withdrawal is not valid by *day* +4. The bases on which AEMOmay determine that the objection withdrawal is not valid are:

1. the *delivery point* specified in the objection does not match that specified in the transaction initiated under **clause 11.1**;
2. the time period allowed under **clause 11.5** for the lodgement of objection withdrawals, has elapsed; or
3. the objecting participant has not notified AEMO of an objection in relation to the relevant correction transaction;

(2) if all objections are not withdrawn under **clause 11.5(1)**, AEMO must cancel and end the correction transaction, and notify the *current user*, *relevant network operator* and, in the case of a correction to a change of user transaction, the *previous user*, that the correction transaction for the *delivery point* is cancelled by *day* +5; and

### (3) If the *current user* wishes to resubmit the transaction, it must initiate a new transaction under clause 11.

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| **ATTACHMENT E – PROPOSED RETAIL MARKET PROCEDURE CHANGES**  **IN003/14 – NSW/ACT Gas Interface Protocol**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

**Extract from Version 12.0 of the RMP-N/A**

**Amend the definitions in clause 1.3 as follows:**

***Gas Interface Protocol*** means the protocol which governs the manner and form in which information is to be provided, notice given, notices or documents delivered and requests made as contemplated by these *Procedures*.

***Interface Control Document*** as contained in the *Gas Interface Protocol*.

**Amend clause 45.2 as follows:**

**45.2 These Procedures and Other Instruments**

1. **Other Instruments**

(a) each person required to comply with these *Procedures*, must also comply with the *Gas Interface Protocol*

(b) in the event of any inconsistency between the provisions of these *Procedures* and either of the documents listed in clause 45.2(1), the inconsistency is to be resolved by giving precedence to these *Procedures*

(c) AEMO must publish the *Gas Interface Protocol*, as amended from time to time.

1. **Amendment**

The *Gas Interface Protocol* may only be amended by AEMO undertaking one of the following consultative procedures:

(a) the ordinary process for making *Procedures* under rule 135EE of the Rules.

(b) the expedited process for making *Procedures* under rule 135EF of the Rules.

**(3) Effect**

(a) There is no clause 45.2(3)(a).

(b) In relation to the communications contemplated in the *Gas Interface Protocol*, subject to AEMO*'s* discretion, a *self-contracting user* that is a *current user* for *delivery points* that are not located in a *STTM network section* or a *no OBA network section* or an *OBA network section* may communicate directly with a *relevant network operator* outside of the requirements of the *Gas Interface Protocol* in a manner that is otherwise consistent with the *Procedures*.

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| **ATTACHMENT F – PROPOSED RETAIL MARKET PROCEDURE CHANGES**  **IN002/14 – Specification Pack Update for T900 File**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

**Extract from Version 3.6 of the FRC B2B System Interface Definitions**

**Amend Appendix G as follows:**

# Appendix G RoLR Process (SA Only)

1. **Customer and Site Details (Monthly update) (T900)**

In order to manage the ‘transfer’ and customer set up following a RoLR event, all Users are to provide to AEMO, on a monthly basis, a list of MIRNS and associated details for which they are the current user.

The Customer and Site Details (Monthly) listing is to be refreshed after the end of the calendar month by Users. Users must FTP the refreshed files to AEMO. AEMO will provide a secure location for each file that enables Users to directly place the file in a secure location to which the relevant all Users has Market Information Bulletin Board (MIBB) access privileges that require a username and password.

This file is to be provided in CSV format. The following file naming convention is to be used:

SAGAS\_CUSTOMERSITEDETAILSMONTHLY\_OriginatorID\_RecipientID\_CCYYMMDDHHmmSS

Note:

1. Reference to Default RoLR as described below, is as appointed by the Australian Energy Regulator, in accordance with Part 6 of the NERL.

| **Transaction 900** | | |
| --- | --- | --- |
| Heading/Column designator | Mandatory / Optional | Comment |
| NMI | M | Must be present |
| NMI\_Checksum | M | Must be present |
| Person\_Name\_Title | O | Contains customer’s title |
| Person\_Name\_Given | O | Contains customer’s first name |
| Person\_Name\_Family | O | Contains customer’s surname if Business-Name is not populated |
| Business\_Name | O | Contains company or business name, required if Person\_Name\_Family is not populated |
| Building\_OrProperty\_Name\_1 | O | Defines the building or Property name as per the Australian Standard AS4590 |
| Building\_OrProperty\_Name\_2 | O | Defines the building or Property name as per the Australian Standard AS4590 |
| ContactDetail\_PersonName | O | Contains contact’s mailing name or company name |
| Flat\_Or\_Unit\_Type | O | This relates to the site of the MIRN |
| Flat\_Or\_Unit\_Number | O | This relates to the site of the MIRN |
| Floor\_Or\_Level\_Type | O | This relates to the site of the MIRN |
| Floor\_Or\_Level\_Number | O | This relates to the site of the MIRN |
| Location\_Description | O | This relates to the site of the MIRN |
| House\_Number\_1 | O | This relates to the site of the MIRN |
| House\_Number\_2 | O | This relates to the site of the MIRN |
| House\_Number\_Suffix\_1 | O | This relates to the site of the MIRN |
| House\_Number\_Suffix\_2 | O | This relates to the site of the MIRN |
| Lot\_Number | O | This relates to the site of the MIRN |
| Street\_Name\_1 | M | This relates to the site of the MIRN |
| Street\_Name\_2 | O | This relates to the site of the MIRN |
| Street\_Type\_1 | M | This relates to the site of the MIRN |
| Street\_Type\_2 | O | This relates to the site of the MIRN |
| Street\_Suffix\_1 | O | This relates to the site of the MIRN |
| Street\_Suffix\_2 | O | This relates to the site of the MIRN |
| Site\_Address\_City | M | This relates to the site of the MIRN |
| Site\_Address\_State | M | This relates to the site of the MIRN |
| Site\_Address\_Postcode | M | This relates to the site of the MIRN |
| Mail\_Address\_Line\_1 | O | Contains formatted postal address details |
| Mail\_Address\_Line\_2 | O | Contains formatted postal address details |
| Mail\_Address\_Line\_3 | O | Contains formatted postal address details |
| Suburb\_Or\_Place\_Or\_Locality | O | Contains formatted postal address details |
| State\_Or\_Territory | O | Contains formatted postal address details |
| Postcode |  | Contains formatted postal address details |
| ContactDetail\_PhoneNumber\_1 | O | Contains contact’s primary phone number |
| ContactDetail\_PhoneNumber\_2 | O | Contains contact’s secondary phone number |
| Rebate\_Code | O | Allowed Codes:  Nil. |
| Pensioner\_Or\_HealthCare\_CardNumber | O | 10 – string Nine Numeric and one alpha unique identifier as issued by the Dept. of Social Security or Veterans’ Affairs |
| From\_Date | O | Effective date at which the card is valid |
| To\_Date | O | Date at which the card expires |
| Date\_Of\_Birth | O | Customer’s date of Birth |
| Customer\_Identification | O | 12 – string. Contains Customer’s Driver’s license |
| RoLR | M | Default RoLR |

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| **ATTACHMENT G – PROPOSED RETAIL MARKET PROCEDURE CHANGES**  **IN004/14 – Build Pack Change to Remove Standard for Process Flows**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

**Extract from Version 3.0 of the Participant Build Pack 2 – Usage Guidelines**

**3. Interpretation Guidelines**

**3.1 There is no section 3.1.**



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| **ATTACHMENT H – PROPOSED RETAIL MARKET PROCEDURE CHANGES**  **IN025/13 – Removal of Obligation to Publish SA Profiling Guideline**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

**Extract from Version 6.0 of the RMP-S**

**Amend clause 209(2) as follows:**

**209. AEMO determines profiles**

(1) AEMO may determine from time to time, as a *reasonable and prudent person*, the *profiles* to be used in this Division 5.4.2.

(2) There is no clause 209(2).~~AEMO must, from time to time, publish guidelines which set out:~~

~~(a) the principles on which the~~ *~~profiles~~* ~~referred to in clause 209(1) are based; and~~

~~(b) the principles which AEMO applies in the selection of a~~ *~~profile~~* ~~for a~~ *~~gas day~~*~~; and~~

~~(c) AEMO’s policy on the retention and management of the~~ *~~profiles~~* ~~referred to in clause 209(1) in a~~ *~~profile~~* ~~library.~~

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| **ATTACHMENT I – PROPOSED RETAIL MARKET PROCEDURE CHANGES**  **IN005/14 – VIC Customer Characterisation Reference**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

**Extract from Version 7.0 of the RMP-V**

**Amend the definitions in clause 1.1.1 as follows:**

***customer characterisation***, in relation to a *Customer*, means whether the *Customer* is:

1. metropolitan or non‑metropolitan (where “metropolitan” refers to the Melbourne metropolitan area), as published by the Victorian Department of Transport, Planning and Local Infrastructure (or its successor); and
2. residential or business, where residential means the primary use of the *consumed energy* is for household purposes and business means the primary use of the *consumed energy* is for commercial type purposes as determined by the retail business for customer billing.

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| **ATTACHMENT J – PROPOSED RETAIL MARKET PROCEDURE CHANGES**  **IN009/14 – SA Disconnection by User**  **Blue represents additions Red and strikeout represents deletions – Marked up changes** |

**Extract from Version 6.0 of the RMP-S**

**Amend clause 111 as follows:**

**111. There is no clause 111.**

(1) **There is no clause 111(1).**

(2) **There is no clause 111(2).**

(3) **There is no clause 111(3).**

(4) **There is no clause 111(4).**

(5) **There is no clause 111(5).**

(6) **There is no clause 111(6).**

(7) **There is no clause 111(7).**