GAS MARKET ISSUE (GMI)

Summary Section

For Proponent or AEMO to complete. Template focuses on issue identification and impact.

Issue Number	IN003/20W		
Version #	2.0..		
Impacted Jurisdiction(s)	WA		
Proponent	Joe Sanches	**Company**	ATCO Gas Australia
Proponent e-mail	joe.sanches@atco.com	**Proponent phone #**	0417030319
Affected Gas Market(s)	• WA Retail Gas	**Date lodged with AEMO.**	Thursday, 28 November 2019
Short Issue Title	Customer Contact Details Process for WA Gas		

Other key contact information

VERSION #	PRESENTED TO	DATE
1.0	GRCF	28 November 2019
2.0	GRCF	21 January 2020

GAS MARKET ISSUE – DETAILED REPORT SECTION

1. DESCRIPTION OF ISSUE

ATCO is the owner and operator of the WA gas distribution systems that delivers gas to over 750,000 customers through more than 14,000km of pipeline.

Key deliverables from ATCO's operations include delivery point reconnections, planned interruptions for maintenance and dealing with unplanned interruptions. Each instance requires direct engagement with customers to ensure site access with the customers and ATCO relies predominantly on email exchanges with retailers for the receipt of customer contact details needed to enable the safe completion of services.

Below is a description of the key issues raised in this GMI:

- Delivery point reconnection (excluding meter lock removals)

  ATCO reconnects delivery points when directly requested by the current retailer (e.g. after customer has settled account) or when a deemed request is evident due to a customer churn request (i.e. the incoming retailer is deemed to have requested a reconnection). In the former instance, the current retailer usually provides customer contact details via the service order they submit.

  However, in the latter instance ATCO will raise a reconnection request on behalf of the incoming retailer and will subsequently exchange emails with that retailer to obtain customer contact details. This process can be time consuming, causing delays with customer churns and result in poor customer experience.

  ATCO estimates approximately 10% of customer reconnections are related to customer churns.

- Planned interruptions

  For the annual routine meter change (RMC) and PVC replacement programmes ATCO currently notifies customers of planned interruption by letter/post to the "occupier" at the premises concerned. These notices can go unnoticed by the customer and will result in ATCO not having access to complete maintenance. In this instance ATCO has to follow up and obtain customer contact details from retailers.

  ATCO estimates approximately 3% of initial RMC notices will require follow up with retailers.

- Unplanned interruptions

  ATCO typically notifies customers of an unplanned interruption by door knocking (face to face) or via social media. Retailers are also notified of certain unplanned interruptions by email and telephone communications.

  The restoration of an unplanned interruption relies on door knocking as ATCO restores supply.

The reliance on emails (and spreadsheet attachments) to exchange customer details or for the notification of unplanned interruptions with multiple retailers is no longer ideal. ATCO is seeking alternative methods of information exchange with retailers to better support operations and improve upon customer experience.

As previously discussed at the GRCF, the Customer Details Notification (CDN) process which exists in East jurisdictions is an option for participants to consider introducing in the WA market. If proceeded this could provide a customer focussed mechanism for the network operator to notify customers by electronic means, such as email or SMS, when customer engagement is needed during site attendance.

Email or SMS are commonly adopted notification methods in various companies, including other network operators such as Western Power and NBN Co. It is ATCO's expectation that customers may prefer these electronic messages over traditional postal notifications.

In addition to seeking the introduction of a market IT/B2B solution, ATCO is separately enhancing its website to provide customer self-service information on interruptions.

[AEMO's preliminary assessment feedback]

In relation to the current process of e-mailing customer contact details, how are Retailers addressing the issue of lawfully providing customer contact to the Distributor?

2. REFERENCE DOCUMENTATION

Procedure Reference

~~TBC~~ Not Applicable.

GIP/Specification Pack Reference

~~Section 4.6 of the Victorian Participant Build Pack 3 (B2B System Interface Definitions).~~ FRC B2B System Interface Definition V4.5 – Amend section 4.6 to include WA CDN requirements.

Specification Pack Usage Guideline v8.0 – Update version numbers for documents

Schema version r13 suite or transaction currently in place in Western Australia

Other Reference

[AEMO's preliminary assessment feedback]

Changes to Specification Pack artefact as specified above. These are WA only changes.

3. SPECIFIC PROPOSAL

Gas retailers have an ongoing relationship with end-use customers and have access to the most up-to-date contact information.

This GMI seeks the introduction of a new procedure in the WA gas retail market that allows the systematic capture of customer contacts details in a structured, secured and controlled manner, to enable ATCO in notifying customer notifications by electronic means such as email or SMS, of maintenance activities and interruptions (both planned and unplanned).

The CDN transaction appears to be the most efficient and effective B2B mechanism available to use in this new procedure, where for each MIRN, retailers would at minimum be required to provide:

- Contact Name
- Email
- Mobile Phone Number

[AEMO's preliminary assessment feedback]

Currently the CDN transaction operates in all east coast jurisdiction. The delivery method, format and trigger process used in South Australia is described in the AEMO Specification Pack document titled FRC B2B System Interface Definitions. See section 4.6 Customer Details Information. Click here to view.

The transaction comprises an aseXML transaction known as CustomerDetailsNotification which contains a Comma-Separated Values (CSV) file. This aseXML transaction was introduced in the r13 version of the schema and has remained in every subsequent schema version.

The transaction initiated by the Retailer and sent to the Distributor to maintain the most up to date Customer Contact Information.

In the interest of maintaining consistency across all jurisdictions and minimising the system impact for Retailers and AEMO, AEMO recommends that the CSV field names remain the same. The existing CSV file used in east coast jurisdiction doesn't contain a field called "Email". If WA participants agree that the e-mail address is required, then the "Email" field would be added to the file and that "Email" field would be positioned at the end of the csv file after the field "Movement_ Type".

From a broad system implementation perspective, given CDN currently exists in the current suite of transaction defined in the R13 schema, there is no requirement to adopt a different version of the schema.

For AEMO changes will involve:

- From a system perspective, changes to the AEMO's r13 certification responder to include CDN and the WA Low Volume Interface (LVI) will need to be modified to include the CDN transaction.
- From a regulatory perspective and noting points 1 and 2 below, if a unanimous support position emerges whereby WA retailers and ATCO agree to adopt the CDN transaction including the format of the CSV file and a target implementation window (See section 9 for ATCO proposed timeline which is before 2021) can also be agree between the impacted parties (including AEMO) formal consultation process (as per chapter 9 of the RMP) will commence. At the conclusion of the formal consultation and if AEMO approves the proposal, a submission will be sent to ERA for approval.

For Retailer and the Network Operator, changes will involve:

- From a system perspective, for the Retailers modify their gateways to send and receive CDN transaction. Internal systems will need to be configuring to trigger the sending of the CDN to Network Operator the details of which will described in the FRC B2B System Interface Definitions. As a guide please refer to the section 4.6 Customer Details Information of the FRC B2B System Interface Definitions which contains the SA requirements for the CDN transaction. Click here to view. Because CDN is a new transaction for WA, all Retailers and the Network Operator must complete the necessary certification requirements prior to implementing the change. Click here to view the WA certification document.

Couple of things to note and discuss at the January GRCF meeting:

1. The CDN process is a single push process from the Retailer to the Network Operator and this proposal doesn't include a process for the Network Operator to request an update of customer contact details from the Retailer. There is a current Gas Market Issue (GMI) (IN011/20) being considered that was recently raised that proposes adding the CustomerDetailsRequest (CDR) transaction to the suite of transactions used in east coast jurisdiction. In the interest of harmonisation of all gas retail markets, WA gas retail market participants should consider including the CDR transaction either as part of this GMI or as part of the IN011/20 consultation. An important thing to note for a WA gas retail market perspective is it will alter the implementation effort because it will require WA to adopt different version of the aseXML schema beyond R13 version. This is because the CDR transaction is not part of the R13 suite of transaction. Migrating to an uplift of the aseXML version requires a co-ordinated cut-over approach which typically occurs on

the weekly schedule Sunday outage window allowing the deployment of the aseXML version to formally take effect on the Monday.

In terms of migrating to a different version of the aseXML schema, from an east coast perspective, there is a Proposed Process Change (PPC) (IN003/19) consultation that will commence shortly that also requires an uplift on the aseXML schema version. This PPC recommends that the uplift of the aseXML schema version take effect sometime in Q4 (Oct – Dec) 2021. Participants in the WA gas retail market may want to consider the same timeline as IN003/19 as it is likely to results in cost savings if a single uplift of the aseXML schema was to occur as opposed to a multiple uplift.

At the January 2020 GRCF meeting, WA participants need to be prepared to discuss the points raised above with a view of making a firm decision about whether to adopt the CDR transaction and if so, whether it be included as part of this GMI or part of the IN011/20 GMI and a timeline for the deployment of an uplift of the aseXML version.

2. In the east coast gas retail markets, the technical protocols refer to either the National Energy Retail Rules (NERR) or distribution Access Arrangements that Retailers are to supply customer contact details to Distributors. In the WA electricity market, it is AEMO view that the Electricity Industry (Metering) Code 2012 contains a provision that requires Retailers to provide customer contact details to Distributors. It is AEMO view that in a WA gas market context, there doesn't appear an equivalent existing head of power that obligates Retailers to provide customer contact information to the Distributor. If there is no head of power as AEMO has suggested, then Retailers will need to obtain legal advice as to whether they can lawfully provide customer contact information to the Distributor.

   In terms of establishing an equivalent WA head of power for gas market, perhaps either the distribution Access Arrangements or Compendium of gas Customer Licence Obligations be amended to include the requirement to provide customer information to the Distributor.

   At the January 2020 GRCF meeting, WA participants need to be prepared to discuss the points raised above in terms of Retailers obtaining their own legal advice and the appropriateness of amending either the distribution Access Arrangements or Compendium of gas Customer Licence Obligations as a way of establishing a means of lawfully provide customer information to a distributor.

4. CONSEQUENCES

If customers do not receive targeted and timely notifications of ATCO's maintenance activities, customers will experience delays in gas supply restoration, customers will complain of the perceived bad service and ATCO can potentially be at risk of non-compliance with the Gas Standards due to maintenance not completing as required (by the Gas Standards.

[AEMO's preliminary assessment feedback]

As identified by the proponent

5. LIKELY BENEFITS FOR INDUSTRY AS A WHOLE

Benefits will include:

- that customers will have immediate access to important information and can take steps to prepare and assist in the safe completion of ATCO maintenance activities;
- that retailers and ATCO have an efficient and effective method of electronic customer data exchange, thereby avoiding manual handling and reducing the need to send letters to customers by post customers;
- that the WA gas retail market adopts best practice communication methods, as is the case in other energy markets, thereby helping to reduce customer complaints and improve customer satisfaction; and
- that ATCO mitigates the risk of non-compliance with the Gas Standards.

[AEMO's preliminary assessment feedback]

As identified by the proponent.

6. PROCESS IMPACT

This GMI introduces a new Procedure where:

- ATCO develops and implements an IT system capability to capture and securely store customer data it receives from retailers;
- retailers implement an IT system capability to provide up-to-date customer data to ATCO; and
- existing customer data information exchange by email and telephones is eradicated

[AEMO's preliminary assessment feedback]

As noted in the feedback in section 3.

7. IMPACT OF ISSUE NOT PROCEEDING

This issue affects ATCO, retailers and end-use customers. If not proceeding, gas retail market participants will continue to rely on manual processes to exchange customer data, expending time on chasing up outstanding responses and affected customers will incur negative experience resulting in customer complaints and a bad reflection on the gas retail market.

[AEMO's preliminary assessment feedback]

As identified by the proponent

8. SUPPORTING DOCUMENTATION

N/A

9. ANY CRITICAL TIMELINES TO CONSIDER?

This GMI anticipates a new procedure implementation by end of 2020.

[AEMO's preliminary assessment feedback]

Once the two key issues (inclusion of the CDR transaction and Retailers legal advice on providing customer contact information to the Distributor) noted in section 3 are addressed and the requirements in this GMI are agreed by the GRCF, AEMO will prepare a timeline for the procedure change consultation.

AEMO will also coordinate with,

- All participants to develop an indicative timeline to ensure implementation of system changes is aligned.

GAS MARKET ISSUE – RELEVANT ATTACHMENT(S)