



---

# AEMO GAS RETAIL MARKET COMPLIANCE QUARTERLY REPORT GAS RETAIL MARKET PROCEDURES

---

PREPARED BY: AEMO

---

# Introduction

## ROLE OF AEMO

For New South Wales (NSW), Australian Capital Territory (ACT), South Australia (SA), Victoria (VIC) and Queensland (QLD) gas retail markets, section 91MB(3) of the National Gas Law (NGL) requires that, if AEMO has reasonable grounds to suspect a breach of the Retail Market Procedures (Procedures), it must, after making such inquiries and investigations as it considers appropriate, make a decision as to whether the breach is a material breach. AEMO must publish that decision and its reasons. AEMO is required to assess the materiality of breaches of the Procedures and if it determines that the breach is material may direct a person suspected of a breach to take remedial action. AEMO is not required to undertake this assessment for breaches of the NGL and National Gas Rules (NGR).

For Western Australia (WA) gas retail market, Chapter 6 of the WA Retail Market Procedures deals with Compliance and Interpretation and places a number of obligations on AEMO. AEMO's role under Chapter 6 of the WA Retail Market Procedures includes:

- To create a Compliance Panel and support that panel<sup>1</sup>.
- To make determinations on whether to refer Procedure compliance and interpretation matters to the Compliance Panel.

The Compliance Panel makes all decisions under Chapter 6, except that it may delegate authority to AEMO to make determinations on whether a Procedure breach is material<sup>2</sup>.

## PURPOSE

This report includes immaterial breaches identified in the last quarter, i.e. between March and May 2021. Breaches that have a material impact on market participants, the market as a whole, or end use customers are reported separately.

For WA gas retail market, any breaches that are referred to the Economic Regulation Authority (ERA) or have material impact on any other market participants, the market as a whole, or end use customers are reported separately and are included as a line item in this report for completeness.

## VERSION CONTROL

Version	Release date	Changes
1.0	11 June 2021	Initial version

<sup>1</sup> The Compliance Panel has established the "WA Gas Retail Market Compliance Panel Guidelines" to set out its governance and administrative arrangements, as required by clause 338 of the Procedures. The WA Gas Retail Market Compliance Panel Guidelines are available on the AEMO website ([www.aemo.com.au](http://www.aemo.com.au)), and should be read in conjunction with the WA Gas Retail Market Compliance Guidelines.

<sup>2</sup> Clause 343(3) of the WA Retail Market Procedures.

## QUARTERLY REPORT – IMMATERIAL BREACHES

Date of breach	Market	AEMO/Market participant	Procedures and clause	Summary	Impact
18 and 19 March 2021	WA	AEMO	14(1)(b) of WA RMP	<p><u>Description</u></p> <p>Between 10.24am (AEST) on 18 March 2021 and 4.30pm on 19 March, WA GRMS gateway connectivity to Gas FRC Hub was lost. WA gas retail market system (GRMS) was not able to send aseXML messages to the Gas FRC Hub or receive aseXML messages from the Gas FRC Hub.</p> <p>On 19 March 9.05am, AEMO identified that aseXML messages had not been processed in WA GRMS since 10.24am on 18 March. AEMO investigated the issue and found that the connectivity between WA GRMS gateway and Gas FRC Hub was affected. AEMO notified the participants of the incident at 12.30pm. AEMO continued to investigate the cause of the connectivity issue and identified a problem with name resolution provided by an Optus public DNS server (not owned and operated by AEMO). At 4.25pm, the connectivity issue was resolved and the connectivity between WA GRMS gateway and Gas FRC Hub was restored. At 5pm, AEMO notified the participants that the incident had been resolved. All on-hold aseXML messages in WA GRMS were processed and successfully sent to the market. (Note: participants did not receive aseXML message acknowledgements until the issue was resolved on 19 March and so should be aware that the aseXML messages were not processed prior to the issue was resolved.)</p> <p>This is a breach of clause 14(1)(b) of the WA RMP which requires AEMO to comply with the FRC Hub Operational Terms and</p>	<p>Immaterial</p> <p>On 19 April 2021, AEMO requested participants to provide their feedback on this breach by 3 May.</p> <p>AEMO received feedback from AGL confirming no further issues with the delays caused by the outage.</p> <p>After having regard to the other matters in clause 329(1) of the WA RMP, AEMO has determined that the breach was not material and resolved. AEMO to take no further action in relation to this matter.</p>

Date of breach	Market	AEMO/Market participant	Procedures and clause	Summary	Impact
				<p>Conditions. Section 3.3.4 of the FRC Hub Operational Terms and Conditions specifies the availability of the FRC Hub message delivery service provides by AEMO. FRC Hub means the information system provided by AEMO for the transmission of aseXML messages under the jurisdictional RMP. For the month of March 2021, the business hours availability of WA GRMS was 95.13% which is below the 99.6% uptime requirement. The non-business hours availability of WA GRMS was 96.77% which is below the 98% uptime requirement.</p> <p><u>Cause</u></p> <p>AEMO identified that an Optus public DNS resolver was serving an outdated DNS record that resolved the disaster recovery IP address rather than the production IP address. This was likely due to an excessively long TTL (time to live) configured for the WA GRMS DNS record.</p> <p><u>Actions</u></p> <p>On 19 March at 4.25pm, AEMO changed the priority given to the Optus DNS server in the public resolver pool. This resolved the connectivity issue and the connectivity between WA GRMS gateway and Gas FRC Hub was restored.</p> <p>AEMO implemented an additional alert that will run at defined intervals during the business day. The alert will be raised if there have been no messages from the Gas FRC Hub in a previous time window. AEMO will also investigate to significantly decrease the TTL configured for the WA GRMS DNS record used to receive aseXML messages from the Gas FRC Hub.</p>	

Date of breach	Market	AEMO/Market participant	Procedures and clause	Summary	Impact
1 June 2020 and 26 October 2020	WA	AGL Sales Pty Ltd	72(1) and 74A(4) the WA RMP	<p><u>Description</u></p> <p>As part of AGL’s third party monitoring program, it has been identified that Connectnow (a third-party moving service who arranges connections for customers on behalf retailers) did not obtain complete explicit informed consent required for the access and use of the complete MIRN listing from 1 June 2020 to 26 October 2020. Over this period, 1346 customers who signed up with AGL via the Connectnow call centre were impacted.</p> <p>This is a non-compliance with clause 72(1) and 74A(4) of the WA RMP relating to obtaining explicit informed consent to access and use the complete MIRN listing.</p> <p><u>Cause</u></p> <p>Through AGL’s third-party monitoring program which assesses calls on a monthly basis, AGL identified that Connectnow agents did not read the scripting relevant to clause 72(1) and 74A(4) of the WA RMP to WA customers. The monthly assessments were provided to Connectnow. Connectnow investigated and identified that the root cause was due to an update to the scripting on 1 June 2020. As part of this update, the relevant wording was intended to be moved to a different section of the script, however as a result of human error the wording was inadvertently omitted from the scripting.</p> <p><u>Actions</u></p> <p>Connectnow updated the scripting on 26 October 2020 to reinstate the relevant wording. All 1346 customers provided explicit informed consent to the transfer of their accounts to AGL (as required under clause 79(1) of the WA RMP) and all other</p>	<p>Immaterial</p> <p>On 31 March 2021, AEMO requested participants to provide their feedback on this breach by 14 April.</p> <p>AEMO did not receive any feedback from participants.</p> <p>After having regard to the other matters in clause 329(1) of the WA RMP, AEMO has determined that the breach was not material and resolved. AEMO to take no further action in relation to this matter.</p>

Date of breach	Market	AEMO/Market participant	Procedures and clause	Summary	Impact
				<p>mandatory terms and conditions were also provided and agreed to. As such, AGL believes that there was minimal customer impact.</p> <p>In addition to the corrective actions taken to reinstate the scripting mentioned above, Connectnow and AGL have taken the following preventative actions:</p> <ul style="list-style-type: none"> <li>• AGL will be provided with calls for each variation of state / fuel / energy plan as part of all change management requests to ensure that any omissions of mandatory scripting are identified immediately.</li> <li>• As part of AGL's third-party monitoring program, AGL will continue to review and monitor monthly sales across all states to ensure vendor adherence with mandatory AGL scripting.</li> </ul>	
09 April 2021	QLD	AEMO	6.10.2(a) of QLD RMP	<p><u>Description</u></p> <p>On 9 April 2021, the provision of the network allocation daily (NAD) file for gas day 8 April for the QLD gas retail market to the STTM system was delayed by 1 hour and 10 minutes.</p> <p>This caused a non-compliance with the QLD RMP relating to the timely provision of the NAD file to the STTM system.</p> <p><u>Cause</u></p> <p>On 8 April, AEMO scheduler server was rebooted as part of a site transfer of server failover around 4.40PM (AEST).</p> <p>On 9 April, basic meter profile (BMP) job failed to complete in the morning because the workflow processing was stalled due to the DWGM server that runs the BMP job (SSIS server) became</p>	<p>Immaterial</p> <p>AEMO's non-compliance with clause 6.10.2(a) of the QLD RMP on 09 April 2021 had no material impact on any other market participants, the market as a whole, or end use customers.</p> <p>There was no impact on the STTM daily prudential calculations and processing as the NAD file was delivered prior</p>

Date of breach	Market	AEMO/Market participant	Procedures and clause	Summary	Impact
				<p>unreachable. An alert for the unsuccessful completion of data import was received at 10.12AM.</p> <p><u>Actions</u></p> <p>On 9 April 10:45AM, the SSIS server was rebooted. The SSIS server was back online and reachable after the reboot. The BMP job completed successfully and the NAD file processing job was re-triggered and completed at 11.40AM.</p> <p>AEMO has reviewed and updated the maintenance procedure to include step to test the SSIS server to ensure the SSIS server connects to the scheduler server. AEMO has set up an alert to detect any disconnection between the SSIS server and the scheduler server.</p>	<p>to the processing of the STTM daily prudential.</p>
23 April 2021	NSW-ACT	AEMO	8.11.15(a)(ii) of NSW-ACT RMP	<p><u>Description</u></p> <p>The NAF file for March 2021 for the NSW-ACT gas retail market was late by three business days, delivered to the STTM system on 28 April.</p> <p>This is a breach of clause 8.11.15(a)(ii) of the NSW-ACT RMP relating to timely provision of the NAF file to the STTM system (on 15<sup>th</sup> business day after the end of a month).</p> <p><u>Cause</u></p> <p>The generation of the NSW NAF file is a manual procedure. In the execution of the operational procedure an incorrect date was entered resulting in the generation of a NAF file for February 2021 rather than for March 2021.</p> <p><u>Actions</u></p>	<p>Immaterial</p> <p>AEMO's non-compliance with clause 8.11.15(a)(ii) of the NSW-ACT RMP on 23 April 2021 had no material impact on any other market participants, the market as a whole, or end use customers.</p> <p>There was no impact on the STTM March 2021 Final settlement calculations and processing as the NAF file was delivered prior to the processing of the STTM March 2021 settlement run.</p>

Date of breach	Market	AEMO/Market participant	Procedures and clause	Summary	Impact
				<p>The NSW NAF file for March 2021 was delivered to the STTM system on 28 April 2021 prior to the STTM settlement run for March 2021 Final settlement.</p> <p>AEMO will review the operational procedure for the generation of the NAF file. The review will consider the following options:</p> <ul style="list-style-type: none"> <li>Automation of the generation of the NAF file, removing the need to enter a date.</li> <li>The addition of checks to confirm successful delivery of the scheduled NAF file.</li> </ul>	
20 April 2021	SA	AEMO	7.1(c) of SA RMP	<p><u>Description</u></p> <p>The processing of 8 SA complete Customer listing files was late by 4 business days, validated on 26 April 2021.</p> <p>This is a breach of clause 7.1(c) of the SA RMP which requires AEMO to validate the complete Customer listing files by the 12th business day after the end of a month.</p> <p><u>Cause</u></p> <p>On 29 March 2021, CGI changed the password for logins on the MIBB server but did not update the password in the property file on the SA GRMS FTP server. As a result, 8 SA complete Customer listing files were not picked up from the MIBB by SA GRMS between 29 March and 26 April 2021.</p> <p><u>Actions</u></p> <p>The 8 SA complete Customer listing files were processed on 26 April 2021.</p>	<p>Immaterial</p> <p>AEMO's non-compliance with clause 7.1(c) of the SA RMP on 20 April 2021 had no material impact on any other market participants, the market as a whole, or end use customers.</p>

Date of breach	Market	AEMO/Market participant	Procedures and clause	Summary	Impact
				AEMO will review and update the operational procedure for the password update.	