

For NSW/ACT, QLD, SA, and VIC: Notice to all Registered Participants under the NGR

For NSW/ACT, QLD, SA, and VIC, this Notice is to advise Participants on AEMO's decision to approve amendments to the:

- Participant Build Pack 1 Table of Transaction
- Gas Interface Protocol - Victoria
- Gas Interface Protocol - Queensland
- NSW/ACT specific Participant Build Pack 5
- Gas Interface Protocol – NSW/ACT
- B2B Service Order Specifications – Part 2
- B2B Service Order Specifications – Part 1
- AEMO Specification Pack - Specification Pack Usage Guidelines

This Notice advises Gas Market Registered Participants that consultation under the ordinary Procedure Change Consultative Process prescribed under Rule 135EE of the National Gas Rules (NGR) concluded on 20 October 2020 for:

- IN026/15 (New JECs)

Prior to commencing the ordinary consultation process, AEMO published the Proposed Procedure Change (PPC) on the AEMO website as described in rule 135ED of the NGR. The Gas Retail Consultative Forum (GRCF) was invited to examine the PPC. AEMO received submissions from AGL, Australian Gas Networks, Alinta Energy, Jemena Gas Networks, Multinet Gas Networks, Origin Energy, Red and Lumo Energy, and Simply Energy. These submissions supported the majority of AEMO's proposed changes and suggested a number of minor editorial changes to the draft Technical Protocol (TP) documents. AEMO incorporated most of these suggested changes into the draft TP documents issued alongside the Impact and Implementation Report (IIR).

As required under Rule 135EE of the NGR, Gas Market Registered Participants and other interested parties were invited to submit comments to AEMO on this IIR. Submissions closed on 20 October 2020. AEMO received submissions from AGL, Australian Gas Networks, Multinet Gas Networks, Origin Energy, and Red and Lumo Energy, all of which supported the proposal and some of which proposed a number of additional minor editorial amendments.

Attachment B of this Notice sets out the consolidated feedback relating to the proposed amendments that AEMO received during this consultation phase. This attachment includes stakeholder comments, AEMO responses and, based on those responses, an indication where respondent feedback resulted in further amendments to the TP documents mentioned above.

Having considered the feedback provided by each respondent, AEMO has approved the proposed amendments (Attachment A) of this Notice. The date on which these changes will take effect will be published in a separate notice (Notice of Effective Date). AEMO proposes to issue

that notice by the end of March 2021. The target effective date for these changes is Q4 (Oct-Dec) 2021.

Updated versions of the documents mentioned in Attachment A will be published on the AEMO website prior to the effective date.

Should you require any further information please contact Arjun Pathy on (03) 9609 8983.

For WA, Notice to all Registered Participants in accordance with clause 383(3) of the RMP WA

For WA, this Notice is to advise Participants on AEMO's decision to submit amendments on the following to the Economic Regulation Authority (ERA):

- B2B Service Order Specifications – Part 2
- B2B Service Order Specifications – Part 1
- AEMO Specification Pack - Specification Pack Usage Guidelines

This Notice advises Gas Market Registered Participants that consultation under the ordinary Procedure change consultative process prescribed under clause 383 of the Retail Market Procedures (RMP) WA concluded on 20 October 2020 for:

- IN002/150W (New JECs for WA)

Prior to commencing the ordinary consultation process, AEMO published the Proposed Procedure Change (PPC) on the AEMO website as described in clause 380(2) of the RMP WA. As required under clause 381(2) the Gas Retail Consultative Forum (GRCF) were invited to examine the PPC. The majority of submissions supported the proposal, and a number of minor editorial changes were proposed to the proposed Technical Protocol (TP) documents. AEMO incorporated most of these suggested changes into the draft RMP WA issued alongside the Impact and Implementation Report (IIR).

As per clause 383(1) of the RMP WA, AEMO published on its website a consultation notice inviting participants, pipeline operators, prescribed persons and interested persons to submit written comments on the IIR, which provided details about the proposed change including a draft identifying the amendments with marked up changes. Submissions closed on 20 October 2020. AEMO received submissions from AGL, Alinta Energy, and Origin Energy supporting the proposal and proposing a number of additional minor editorial amendments.

Having considered feedback to the PPC consultation and given the unanimous support to the IIR consultation, AEMO has decided to submit an application for approval of the proposed amendments for IN003/20W to the Economic Regulation Authority (ERA). These proposed amendments will incorporate several of the additional editorial amendments proposed in response to the IIR.

AEMO intends to submit the amendments for IN003/20W to the ERA with three other proposals (IN002/15W, IN009/19W and IN010/20W). AEMO will publish the application for approval at the time it is submitted to the ERA.

Should you require any further information please contact Arjun Pathy on (03) 9609 8983 or at grcf@aemo.com.au.

ATTACHMENT A – DOCUMENTATION CHANGES

Draft versions of the technical protocols showing tracked changes between the current and amended versions are attached separately to this document.

ATTACHMENT B – FEEDBACK TO THE IIR

Section 1 - General Comments on the Impact and Implementation Report (IIR).

Topic	Item#	Who	Response Received	AEMO response
General Comments on the Impact and Implementation Report for WA (IN002/15W).				
Sections 1 to 9 of the IIR sets out details of the proposal. In respect of the changes proposed for WA, does your organisation supports AEMO's assessment of the proposal? If no, please specify areas in which your organisation disputes AEMO's assessment (include IIR section reference number) of the proposal and include information that supports your organisation's rationale for not supporting AEMO's assessment.	1	AGL	AGL supports the assessment undertaken by AEMO and supports the proposal to move the JECs to an enumerated non-schema list.	AEMO notes AGL's support for the proposal in respect of the WA retail gas market.
	2	Alinta Energy	Alinta Energy supports the proposed changes set out in the IIR to: <ul style="list-style-type: none"> • Add new Job Enquiry Codes (JECs) for the installation and removal of the new trailer air coupling device (TCI and TCR respectively); • Add a fourth optional character to existing JECs for AML (attach meter lock),DSD (disconnect in street), MRM (regulator removal request) and TCI to specify a sub-code that identifies the reason for the JEC; and • Move the JECs to a non-versioned aseXML enumerations list. We acknowledge that to achieve the above, WA gas retail market participants will need to implement system changes to uplift the current aseXML schema version r13 to a version beyond r38, with a target date of Oct-Dec 2021.	AEMO notes Alinta Energy's support for the proposal in respect of the WA retail gas market.
	3	Origin Energy	Origin has assessed the IIR and acknowledge the value to introduce the 2 new JEC values into the WA gas market: <ul style="list-style-type: none"> • TCI - Install Trailer Air Coupling to stop supply of gas 	AEMO notes Origin Energy's acknowledgement of the value of the proposal in respect of the WA retail gas market.

			<ul style="list-style-type: none"> TCR - Remove Trailer Air Coupling to allow gas to flow <p>Origin conveyed within the PPC that there was no direct benefit for our organisation to add the fourth character to the AML Job Enquiry Code. We however note and observe AEMO's response that the proposed TP documents do not obligate a retailer to use the four-character version of the JEC enumeration and the retailer can continue to send only the "AML" transaction.</p>	
General Comments on the Impact and Implementation Report for WA (IN026/15).				
<p>Sections 1 to 9 of the IIR sets out details of the proposal.</p> <p>In respect of the changes proposed in east-coast jurisdictions, does your organisation supports AEMO's assessment of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO's assessment (include IIR section reference number) of the proposal and include information that supports your organisation's rationale for not supporting AEMO's assessment.</p>	4	AGL	AGL supports the assessment undertaken by AEMO and supports the proposal to move the JECs to an enumerated non-schema list.	AEMO notes AGL's support for the proposal in respect of east-coast retail gas markets.
	5	AGN	Yes	AEMO notes AGN's support for the proposal in respect of east-coast retail gas markets.
	6	MGN	Multinet Gas Supports the assessment.	AEMO notes Multinet Gas Networks' support for the proposal in respect of east-coast retail gas markets.
	7	Origin Energy	As per above	AEMO notes Origin Energy's support for the proposal in respect of east-coast retail gas markets.
	8	Red and Lumo Energy	Red Energy and Lumo Energy (Red and Lumo) continue to support AEMOs assessment of the proposal to introduce new JECs in line with the IIR published.	AEMO notes Red and Lumo Energy's support for the proposal in respect of east-coast retail gas markets.

Comments on the proposal to move JECs to a non-versioned list in the aseXML schema.				
<p>Section 1.3 of the IIR sets out AEMO’s proposal to move JECs to a non-versioned list in the aseXML schema.</p> <p>Assuming that the changes to JECs are adopted, does your organisation support AEMO’s proposal to move JECs to a non-versioned list?</p> <p>If no, please specify areas in which your organisation disputes AEMO’s assessment (include IIR section reference number) of the proposal and include information that supports your organisation’s rationale for not supporting AEMO’s assessment.</p>	9	AGL	AGL supports the assessment undertaken by AEMO and supports the proposal to move the JECs to an enumerated non-schema list.	AEMO notes AGL’s support for adopting a non-versioned list for JECs.
	10	AGN	<p>In relation to the JECs moving to a non-versioned enumeration list, whilst we accept the benefits in being more nimble and able to move to include new reason linked JECs to enable expected future new regulatory reporting requirements to be met, we also see some financial risk in this.</p> <p>Implementation costs of new JECs for distributors are very significant, as our cost estimates for the new JECs currently proposed have revealed.</p> <p>We acknowledge that any future new JEC proposals, like any other change proposal, will be subject to a full industry consultation, where the change would only be recommended by AEMO if there was a clear net industry benefit. Any contentious proposals must be subjected to a full industry cost/benefit analysis with input from all participants.</p> <p>However we remain concerned that the non-versioned list could potentially increase the risk that some ‘nice to have’ JECs get up,</p>	<p>AEMO notes AGN’s concerns regarding the cost of future changes. As noted at the September GRCF meeting, any future changes to JECs would have to undergo a full industry consultation process. In particular, this means that any future changes would have to meet the National Gas Objective. As such, AEMO would only be able to implement any future changes to JECs if those changes represented an “efficient investment in... natural gas services... with respect to price”¹. Hence, if a future change represents a substantial cost to distributors without representing a commensurate or greater benefit to the rest of the market, AEMO would not proceed with the change.</p>

¹ The full text of the NGO, as stated in the National Gas Law, is “to 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.”.

			rather than only those that have broad industry support. New JECs are expensive for distributors to implement, and any future proposals should be carefully considered and potentially limited to those that meet new regulatory requirements, unless there is an obvious benefit to all participants.	
	11	Alinta Energy	Alinta Energy supports moving the JECs to a non-versioned aseXML enumerations list ("GasEnumerations.xsd") so that new JECs can be added in the future without a schema change.	AEMO notes Alinta Energy's support for adopting a non-versioned list for JECs.
	12	Origin Energy	Origin supports the proposal to move JECs to a non-versioned list in the aseXML schema.	AEMO notes Origin Energy's support for adopting a non-versioned list for JECs.
	13	Red and Lumo Energy	Red and Lumo provide in principle support to AEMO to move JEC enumerations to a non-versioned aseXML enumerations list to allow changes in the future without the need for a full schema change. We believe that there needs to be clear controls around the associated documentation and specifically the need for clear version control across jurisdictions on all documentation. Red and Lumo are concerned that without these clear documentation records the move to a non-versioned list in the aseXML will risk confusion amongst participants on which versions they are expected to follow. To address this Red and Lumo propose that the current Gas Interface Protocol (GIP) (or jurisdictional equivalent) be updated to provide a single reference point that	AEMO notes Red and Lumo Energy's in-principle support for adopting the JEC enumerations in a non-versioned aseXML list. As provided in Attachment C, a row has been added to the GIP documents (or jurisdictional equivalents) listing the version number of the GasEnumerations.xsd file that participants are to follow. Regarding version controls for all existing enumerated lists, this falls outside the scope of the present consultation and therefore will not be considered by AEMO at this time.

		<p>confirms the current version across all jurisdictions.</p> <p>Red and Lumo also propose that this change be expanded to include version controls for all existing enumerated lists which currently exist. Red and Lumo would support the move to a non-versioned list in the aseXML schema only where there are clear documented controls for all participants to avoid the risks above.</p>	
--	--	---	--

Section 2 - Feedback on the documentation changes.

Participant Build Pack 1 - Table of Transactions, Table of Elements, List of Job Enquiry Codes, Address Elements and MIRN and Meter states. (Note: This is an east coast document)					
Item #	Who	Row # Column # in spreadsheet	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
14	AGN		Ref# 1A document is missing from Attachment C.		References to Ref #1A, #4A, and 9 are a drafting error from an earlier version of the IIR. No changes are in fact proposed to those documents, so the Technical Protocols as reflected in Attachment C correctly reflect AEMO's proposed changes. This was an administration oversight and AEMO does not believe it will have any impact on the consultation itself.
NSW/ACT specific Participant Build Pack 5					
Item #	Who	Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
15	Red/Lumo	13. Appendix – G (Table of Transactions – Job Enquiry Codes)	NSW COMMENTS & For relevant Enquiry Codes, successful completion will result in the following MIRN and Meter status changes sections in the table incomplete for AML	The table has been listed as Same Comments as AML for NSW Comments and Same a AML for relevant enquiry codes. However even though the comments match the existing responses for AML as they are separate transactions they must clearly list the comments and MIRN and Meter Status changes in each field NSW Comments - Distributor will use the most appropriate method to stop the flow of gas. successful completion will result in the following MIRN and Meter status changes. - MIRN status = Decommissioned, Meter status = Plugged. Meter physically plugged or locked,	Red / Lumo Energy provided this feedback in response to the PPC, and AEMO provided reasons for not adopting the changes in its response (see Ref #15 in the PPC). Given that Red / Lumo Energy has not provided a new rationale in its IIR feedback, AEMO maintains its earlier position of not accepting the proposed change.
16	Red / Lumo Energy	13. Appendix – G (Table of	NSW COMMENTS & For relevant Enquiry Codes, successful completion will result in the following	The table has been listed as Same Comments as DSD for NSW Comments and Same as DSD ML relevant enquiry codes. However even though the comments match the existing responses for AML as they are separate transactions they must	Red / Lumo Energy provided this feedback in response to the PPC, and AEMO provided reasons for not adopting the changes in its response (see Ref #16 in the PPC). Given that Red / Lumo Energy has not provided a

		Transactions – Job Enquiry Codes)	MIRN and Meter status changes sections in the table incomplete for DSD	<p>clearly list the comments and MIRN and Meter Status changes in each field</p> <p>NSW Comments -Distributor will have operational choice to endeavour to stop gas from flowing, via whatever means applicable up to total disconnection. If multiple delivery points (multiple MIRNs) connected to a service, expect a not complete Service Order response, advising why the job could not be completed.</p> <p>NOTE: In order to resume supply after a successful DSD, a new connection request will need to be initiated.</p> <p>successful completion will result in the following MIRN and Meter status changes. - MIRN status = Deregistered, Meter Status = No Meter</p>	new rationale in its IIR feedback, AEMO maintains its earlier position of not accepting the proposed change.
17	Red / Lumo Energy	13. Appendix – G (Table of Transactions – Job Enquiry Codes)	NSW COMMENTS & For relevant Enquiry Codes, successful completion will result in the following MIRN and Meter status changes sections in the table incomplete for MRM	<p>The table has been listed as Same Comments as DSD for NSW Comments and Same as DSD ML relevant enquiry codes. However even though the comments match the existing responses for AML as they are separate transactions they must clearly list the comments and MIRN and Meter Status changes in each field</p> <p>NSW Comments -MRM is accepted to remove a meter, where there is more than one meter at the MIRN. If there is only one meter onsite, will result in Closed Not complete, and say SDR required.</p> <p>NOTE 1: A SDR MUST accompany the MRM in this case. The matched pair of SDR/MRM must be issued on the same calendar day. Otherwise, the DB will not complete the request and send a Service Order Response with a Job Completion Code that no matched MRM/SDR was provided in the special comments.</p> <p>successful completion will result in the following MIRN and Meter status changes. -MIRN Status = Commissioned, Meter Status (for the removed meter) = No meter. Meter is physically removed from premises.</p>	Red / Lumo Energy provided this feedback in response to the PPC, and AEMO provided reasons for not adopting the changes in its response (see Ref #17 in the PPC). Given that Red / Lumo Energy has not provided a new rationale in its IIR feedback, AEMO maintains its earlier position of not accepting the proposed change.

Gas Interface Protocol – NSW/ACT

Item #	Who	Section #	Issue / Comment	Proposed text	AEMO Response (AEMO only)
				Red-strikeout means delete and <u>blue underline</u> means insert	
18	AGN		Ref# 4A document missing from Attachment C. The table in Appendix B of the IIR for Ref#4 refers to appendix A of PBP 5 but appendix A is not Data Dictionary it is table of transactions. Unable to find reference to asEnumerations.xsd file.		See AEMO response for item #14.

B2B Service Order Specifications – Part 2 (Note: This is a SA and WA document)

Item #	Who	Section #	Issue / Comment	Proposed text	AEMO Response (AEMO only)
				Red-strikeout means delete and <u>blue underline</u> means insert	
19	Alinta	Rows 48-51 Column M	Suggest removing "This is to be used when a Retailer has followed regulatory requirements..." from all MRM enquiry codes. Additional commentary does not add anything to the definition.	This is to be used when a Retailer has followed regulatory requirements and <u>Used to request regulator removal where</u> a customer has not paid their account.	AEMO agrees with Alinta's proposed changed. The deleted references are a copy from the east coast section of the document and dovetail into east coasts broader regulatory instruments. AEMO will make this change to the B2B Service Order Specifications – Part 2 document and Participant Build Pack 1 - Table of Transactions, Table of Elements, List of Job Enquiry Codes document.
20	Alinta	Row 50 Column M	Descriptor for MRMB is incorrect	This is to be used when a Retailer has followed regulatory requirements and a customer has not contacted the customer to set up an account. <u>Used to request regulator removal where there is a breach of contract by the customer.</u>	Same as item #19.
21	Alinta	Row 69-73 Column M	Incorrect description	Used to request a Trailer Air Coupling to be installed to stop the flow of gas. NO may also initiate for safety reasons and then provides the TCI Service Order Response to the Current user. The successful completion of this service order is: regulator-physically-removed <u>Trailer Air Coupling device installed</u> , MIRN Status = Decommissioned	AEMO agrees with Alinta's proposed changed. AEMO will make this change to the B2B Service Order Specifications – Part 2 document and Participant Build Pack 1 - Table of Transactions, Table of Elements, List of Job Enquiry Codes document.

22	Alinta	Row 74 Column M	Incorrect description.	Used to request a Trailer Air Coupling to be removed to restore supply. NO may also initiate for safety reasons and then provides the TCI Service Order Response to the Current user. The successful completion of this service order is: Trailer Air Coupling device removed , MIRN Status = Decommissioned Commissioned	Same as item #21.
23	AGN		In the IIR Attachment B, Ref #6 and Ref# 7 comments have been mixed up. Ref #6 is Part 1 and Ref #7 is part 2.		AEMO notes AGN's comment that referencing were mixed up. This was an administration oversight and should not have any impact on the consultation itself.
24	AGN		Unable to see marked up change related to child and parent comment for Ref#6 document.		For SA, the marked-up change pertaining to "Add a new note about "parent" and "child" JEC for SA" reference is in the B2B Service Order Specifications, Pt 1 document. See Note 2 on page 5, last row in the table. See also item #12.

B2B Service Order Specifications - Part 1 (Note: This is a SA and WA document)

Item #	Who	Row # Column # in spreadsheet	Issue / Comment	Proposed text Red-strikeout means delete and blue underline means insert	AEMO Response (AEMO only)
25	Alinta	Page 8	Amend note for clarity.	Note: * means that this is a parent JEC and this this JEC has with four character child JEC <u>s</u> .	AEMO agrees with Alinta's proposal and will make this change to page 8 and 5.
26	AGL		AGL notes that while the SO types for DMS (Downgrade Meter) and PRE (Pressure Change) are not clearly listed in this document in the SO Elements tables.		The DMS and PRE are to be used in SA. AEMO will add this issue to the IN018/20 (Residual changes related to the bundled release program of work) consultations. This will ensure that SA participants will have the opportunity to comment how these JECs should be listed in this document in the SA SO Elements tables.

AEMO Specification Pack- Specification Pack Usage Guidelines (Note: This is a SA and WA document)

Item #	Who	Section #	Issue / Comment	Proposed text Red-strikeout means delete and blue underline means insert	AEMO Response (AEMO only)
27	AGN		Ref# 9 document missing from Attachment C.		See AEMO response for item # 14