

9 November 2020



Ms Nicola Cusworth
Economic Regulation Authority
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PERTH BC WA 6849

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Dear Ms Cusworth

Approval of amendment to the Retail Market Scheme – Procedure Changes IN003/20W, IN002/15W, IN009/19W, and IN010/20W.

Under section 11ZOL of the *Energy Coordination Act 1994* (the “Act”), the members of an approved Retail Market Scheme may prepare an amendment to their Retail Market Scheme (the “Scheme”) and submit the amendment to the Economic Regulation Authority (“ERA”) for approval.

The framework for the ERA to review and approve amendments to the Scheme is provided in section 11ZOM of the Act. The Scheme is defined to include, amongst other things, the Australian Energy Market Operator (“AEMO”), Retail Market Procedures Western Australia (“RMP WA”), AEMO Specification Pack and Full Retail Competition (FRC) Hub Operational Terms and Conditions. As the formal entity for the Scheme, AEMO is applying to the ERA on behalf of the members for three amendments to the Scheme as described in **Attachment A**.

Background

The RMP WA set out the procedure change process that AEMO must follow before submitting changes to the ERA. AEMO has applied this process, which assisted AEMO and relevant stakeholders in developing the three amendments:

- IN003/20W (CustomerDetailsNotification and CustomerDetailsRequest)
- IN002/15W (New Job Enquiry Codes)
- IN009/19W and IN010/20W (Add Meter Status to WA)

These amendments were finalised by AEMO on behalf of stakeholders when it published the final Impact and Implementation Reports (“IIRs”) on 13 August 2020 for IN003/20W and on 22 September 2020 for IN002/15W, IN009/19W, and IN010/20W.

The consultation that underpins the procedure change process determined that the amendments for all three changes were “material” given that they require IT-system changes for participants and for AEMO.

As per clause 383(1) of the RMP WA, each participant, pipeline operator, prescribed person and interested person was invited to submit written comments on the proposed amendments. Submissions closed on 10 September 2020 for IN003/20W and on 20 October 2020 for IN002/15W, IN009/19W and IN010/20W. All submissions supported all the proposed changes.

AEMO has decided to submit the three amendments to the ERA for approval as endorsed procedure changes. Please refer to **Attachment D** for the three IIRs.

Amendments to the Scheme for ERA consideration

Attachment A contains a summary of each amendment and includes a description on what artefact under the Scheme is changing; the actual changes (in “track change” mode); and any additional relevant information that is not covered in the IIR.

Section 11ZOO (1) and (2) of the Act specifies the criteria that the ERA is to consider in determining whether to approve an amendment to the Scheme. Refer to **Attachment B** for the rationale regarding the proposals’ meeting Scheme change requirements under the Act. AEMO believes that no further amendments are required based on participant feedback to the IIRs as described in **Attachment C**. Further, AEMO believes that the details contained in this application satisfy the criteria under Section 11ZOO that will enable the ERA to consider the amendments.

In accordance with clause 383(4) of the RMP WA, AEMO must provide information to stakeholders about how to make submissions to the ERA on endorsed procedure changes, including a closing date for any ERA submissions. Ms. Lipakshi Dhar from the ERA has provided AEMO with this information, which includes advice that submissions to the ERA will close on 18 December 2020.

Upon sending this application, AEMO will publish this material on its website and include information on how to make submissions to the ERA.

Should the ERA approve the three endorsed procedure changes, AEMO proposes to implement the changes related to IN003/20W, IN002/15W, IN009/19W, and IN010/20W to take effect in the October–December 2021 period. AEMO requests that the ERA consider, endorse, and publish the approval for these changes by 16 February 2021 with an effective date in October–December 2021, which will enable AEMO to publish the amended RMP WA and WA Participants to implement information technology and/or business process changes. As discussed with Ms. Dhar, AEMO will provide a specific effective date following discussion with Scheme participants by the end of March 2021 for gazettal.

If you require any further information or if have any questions in relation to this application, please contact Arjun Pathy at arjun.pathy@aemo.com.au.

Yours sincerely

Mr Peter Geers
Chief Strategy and Markets Officer

ATTACHMENT A – Summary of Amendments

IN003/20W – CustomerDetailsNotification and CustomerDetailsRequest

1. This proposed change involves an amendment to the Technical Protocol (TP) documents to adopt the CustomerDetailsNotification and CustomerDetailsRequest transactions in the interests of efficiently communicating customer information.
2. The Scheme documents requiring amendment are the:
 - FRC B2B System Interface Definitions
 - Specification Pack Usage Guide

IN002/15W – New Job Enquiry Codes

1. This proposed change involves an amendment to the Technical Protocol (TP) documents to add new Job Enquiry Codes. This enables retailers to better communicate the precise nature of the work that is to be done when they request the Distributor to perform work on a customer's meter.
2. The Scheme documents requiring amendment are the:
 - B2B Service Order Specifications - Part 1
 - B2B Service Order Specifications - Part 2
 - Specification Pack Usage Guide

IN009/19W and IN010/20W – Add Meter Status to WA gas retail transactions

1. This proposed change involves an amendment to the Technical Protocol (TP) documents to provide information in a number of transactions regarding the status of the meter (i.e. whether the meter is "turned on", "turned off", and so on). This reduces the need for manual communication between the Distributor and Retailer and therefore improves efficiency and reliability.
2. The Scheme documents requiring amendment are the:
 - FRC B2B System Interface Definitions
 - Specification Pack Usage Guide

ATTACHMENT B – Rationale for proposals IN003/20W, IN002/15W, IN009/19W, IN010/20W meeting the requirement for RMP changes under the Act

IN003/20W

Section	Requirement	AEMO Comment
11ZOO(1)	The Authority may approve an amendment to the Scheme if it is satisfied that:	
	(a) if the amendment is made, the provisions of the Scheme:	
	(i) will comply with the Act; and	The Scheme, in its initial form, was approved by the Minister for Energy; and all amendments to the Scheme since its initial approval have been approved by the Authority, in accordance with the Act. As a result, the Scheme, in its current form, clearly complies with the Act. AEMO's assessment in the IIR was that the changes do not contravene any applicable laws (including the Act), and no participant disputed this assessment in their feedback to the IIR. AEMO is therefore of the view that the Rules will continue to comply with the Act if the procedure change proposal IN003/20W is approved.
	(ii) be suitable for the purposes of section 11ZOB;	Section 11ZOB indicates that the purpose of the Scheme is to ensure that the retail gas market is regulated and is operated in a manner that is: (a) open and competitive; (b) efficient; and (c) fair to gas market participants and their customers. Procedure change proposal IN003/20W proposes the addition of two new transactions to enable participants to more efficiently share customer contact information, which will improve customer experience and minimise labour intensiveness when the Distributor performs works on a customer's meter. As such, AEMO believes the proposal will allow more efficient operation of the market. Further, since the proposal applies equally to all WA gas retail market participants, AEMO's assessment in the IIR was that the proposal is fair to gas market participants and their customers and does not impede openness competition. No participant disputed this assessment in their feedback to the IIR. As such, AEMO believes that the proposal is suitable for the purposes of section 11ZOB.
(b) any other principle, criterion, or requirement that is prescribed for the purposes of this paragraph has been met.	AEMO is not aware of any regulations under section 11ZOO(b), so this section of the Act is not applicable.	

Section	Requirement	AEMO Comment
11ZOO(2)	<p>The Authority may approve an amendment to the Scheme under section 11ZOM only if it is satisfied that the consultation required by section 11ZOL(3) has taken place and:</p> <p>(a) each person required to be consulted has agreed to the amendment; or</p> <p>(b) if any person required to be consulted has not so agreed, that person has been given a reasonable opportunity in the course of consultation to provide reasons for not agreeing, and any reasons so provided have been considered.</p>	<p>The proposed amendment to the Scheme has been consulted in accordance with procedure change process of the RMP WA.</p> <p>AEMO commenced consultation for IN003/20W by publishing the Procedure Change Request (PCR) and inviting registered participants and interested stakeholders to make submissions. AEMO received submissions from AGL, Alinta Energy, Origin Energy, Simply Energy, and Synergy. All submissions supported the proposal and some submissions requested a number of minor editorial changes, most of which AEMO adopted. AEMO subsequently published the Impact and Implementation Report (IIR) requesting further submissions. AEMO received submissions from AGL, Alinta Energy, ATCO Gas, Origin Energy, and Simply Energy. All submissions supported the proposal and some submissions requested a number of minor editorial changes, most of which AEMO adopted (more information on AEMO's responses to these editorial changes can be found in Attachment C).</p> <p>As a result, AEMO submits that it has met all consultation requirements for the amendments proposed in IN003/20W and that each person required to be consulted with has agreed to the amendment.</p>

IN002/15W

Section	Requirement	AEMO Comment
11ZOO(1)	The Authority may approve an amendment to the Scheme if it is satisfied that:	
	(a) if the amendment is made, the provisions of the Scheme:	
	(i) will comply with the Act; and	<p>The Scheme, in its initial form, was approved by the Minister for Energy; and all amendments to the Scheme since its initial approval have been approved by the Authority, in accordance with the Act. As a result, the Scheme, in its current form, clearly complies with the Act.</p> <p>AEMO’s assessment in the IIR was that the changes do not contravene any applicable laws (including the Act), and no participant disputed this assessment in their feedback to the IIR. AEMO is therefore of the view that the Rules will continue to comply with the Act if the procedure change proposal IN002/15W is approved.</p>
	(ii) be suitable for the purposes of section 11ZOB;	<p>Section 11ZOB indicates that the purpose of the Scheme is to ensure that the retail gas market is regulated and is operated in a manner that is:</p> <ul style="list-style-type: none"> (a) open and competitive; (b) efficient; and (c) fair to gas market participants and their customers. <p>Procedure change proposal IN002/15W proposes new functionality for existing transactions that will enable the Distributor to more efficiently use new technologies in meter works and will increase efficiency by automating existing manual processes. Further, since the proposal applies equally to all WA gas retail market participants, AEMO’s assessment in the IIR was that the proposal is fair to gas market participants and their customers and does not impede openness competition.</p> <p>No participant disputed this assessment in their feedback to the IIR. As such, AEMO believes that the proposal is suitable for the purposes of section 11ZOB.</p>
11ZOO(2)	(b) any other principle, criterion, or requirement that is prescribed for the purposes of this paragraph has been met.	<p>AEMO is not aware of any regulations under section 11ZOO(b), so this section of the Act is not applicable.</p> <p>The proposed amendment to the Scheme has been consulted in accordance with procedure change process of the RMP WA.</p> <p>AEMO commenced consultation for IN003/20W by publishing the Proposed Procedure Change (PPC) and inviting registered participants and interested stakeholders to make submissions. AEMO received submissions from</p>

Section	Requirement	AEMO Comment
	<p>(a) each person required to be consulted has agreed to the amendment; or</p> <p>(b) if any person required to be consulted has not so agreed, that person has been given a reasonable opportunity in the course of consultation to provide reasons for not agreeing, and any reasons so provided have been considered.</p>	<p>AGL, Alinta Energy, ATCO Gas, Origin Energy, Simply Energy, and Synergy. All submissions except for Synergy's supported the proposal (more information is provided on Synergy's objections in the following paragraph), and some submissions requested a number of minor editorial changes, most of which AEMO adopted. AEMO subsequently published the Impact and Implementation Report (IIR) requesting further submissions. AEMO received submissions from AGL, Alinta Energy, and Origin Energy. All submissions supported the proposal, and some submissions requested a number of minor editorial changes, most of which AEMO accepted (more information on AEMO's responses to these editorial changes can be found in Attachment C).</p> <p>Synergy argued in their feedback to the PPC that the benefits listed by AEMO in the PPC had not been substantiated during consultation and that Synergy did not have a sufficient volume of meter disconnection requests to warrant the changes proposed. AEMO responded that all other WA retailers had supported AEMO's assessment of the benefits, and that as such the list of benefits provided by AEMO in the PPC had been substantiated. Synergy did not provide a response to the IIR (and therefore did not dispute AEMO's response), so AEMO considers that the list of benefits has been substantiated across the market as a whole. Further, seeing as all submissions to the IIR (and all submissions to the PPC other than Synergy's) supported the proposal, AEMO considers that the benefit to the market as a whole is sufficient to warrant proceeding with the change.</p> <p>AEMO therefore submits that each person required to be consulted who has not agreed has been given a reasonable opportunity in the course of consultation to provide reasons for not agreeing, and that AEMO has considered these reasons. As such, AEMO considers that it has met all consultation requirements for the amendments proposed in IN012/15W.</p>

IN009/19W and IN010/20W

Section	Requirement	AEMO Comment
11ZOO(1)	The Authority may approve an amendment to the Scheme if it is satisfied that:	
	(a) if the amendment is made, the provisions of the Scheme:	
	(i) will comply with the Act; and	<p>The Scheme, in its initial form, was approved by the Minister for Energy; and all amendments to the Scheme since its initial approval have been approved by the Authority, in accordance with the Act. As a result, the Scheme, in its current form, clearly complies with the Act.</p> <p>AEMO’s assessment in the IIR was that the changes do not contravene any applicable laws (including the Act), and no participant disputed this assessment in their feedback to the IIR. AEMO is therefore of the view that the Rules will continue to comply with the Act if the procedure change proposals IN009/19W and IN010/20W are approved.</p>
	(ii) be suitable for the purposes of section 11ZOB;	<p>Section 11ZOB indicates that the purpose of the Scheme is to ensure that the retail gas market is regulated and is operated in a manner that is:</p> <ul style="list-style-type: none"> (a) open and competitive; (b) efficient; and (c) fair to gas market participants and their customers. <p>Procedure change proposals IN009/19W and IN010/20W will reduce delays in customer disconnections and reconnections and thereby serve to make the market more efficient. Further, since the proposal applies equally to all WA gas retail market participants, AEMO’s assessment in the IIR was that the proposal is fair to gas market participants and their customers and does not impede openness competition.</p> <p>No participant disputed this assessment in their feedback to the IIR. As such, AEMO believes that the proposal is suitable for the purposes of section 11ZOB.</p>
	(b) any other principle, criterion, or requirement that is prescribed for the purposes of this paragraph has been met.	AEMO is not aware of any regulations under section 11ZOO(b), so this section of the Act is not applicable.
11ZOO(2)	The Authority may approve an amendment to the Scheme under section 11ZOM only if it is satisfied that the consultation required by section 11ZOL(3) has taken place and:	<p>The proposed amendment to the Scheme has been consulted in accordance with procedure change process of the RMP WA.</p> <p>AEMO commenced consultation for IN009/19W and IN010/20W by publishing the Proposed Procedure Change (PPC) and inviting registered participants and interested stakeholders to make submissions. AEMO received</p>

Section	Requirement	AEMO Comment
	<p>(a) each person required to be consulted has agreed to the amendment; or</p> <p>(b) if any person required to be consulted has not so agreed, that person has been given a reasonable opportunity in the course of consultation to provide reasons for not agreeing, and any reasons so provided have been considered.</p>	<p>submissions from AGL, Alinta Energy, ATCO Gas, Origin Energy, Simply Energy, and Synergy. All submissions supported the proposal and some submissions requested a number of minor editorial changes, most of which AEMO adopted. AEMO subsequently published the Impact and Implementation Report (IIR) requesting further submissions. AEMO received submissions from AGL, Alinta Energy, ATCO and Origin Energy. All submissions supported the proposal and some submissions requested a number of minor editorial changes, most of which AEMO adopted (more information on AEMO's responses to these editorial changes can be found in Attachment C).</p> <p>As a result, AEMO submits that it has met all consultation requirements for the amendments proposed in IN009/19W and IN010/20W and that each person required to be consulted with has agreed to the amendment.</p>

ATTACHMENT C – SUBMISSIONS TO IIR FOR IN003/20W, IN012/15W, IN009/19W, AND IN010/20W

SUBMISSIONS RECEIVED FOR IN002/15W

Please note: consultation IN002/15W was conducted simultaneously with a related change for east-coast jurisdictions. Responses to the east-coast consultation have been removed; as such, the item numbers for the responses are not in order.

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

Topic	Item#	Who	Response Received	AEMO response
Sections 1 to 9 of the IIR sets out details of the proposal.	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.
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.	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	AEMO notes Alinta Energy’s support for the proposal in respect of the WA retail gas market.

			version beyond r38, with a target date of Oct-Dec 2021.	
	3	Origin Energy	<p>Origin has assessed the IIR and acknowledge the value to introduce the 2 new JEC values into the WA gas market:</p> <ul style="list-style-type: none"> • TCI - Install Trailer Air Coupling to stop supply of gas • 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>	AEMO notes Origin Energy's acknowledgement of the value of the proposal in respect of the WA retail gas market.
Section 1.3 of the IIR sets out AEMO's proposal to move JECs to a non-versioned list in the aseXML schema.	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.
Assuming that the changes to JECs are adopted, does your organisation support AEMO's proposal to move JECs to a non-versioned list?	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.
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.	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.

Section 2 - Feedback on the documentation changes.

Ref #6 – B2B Service Order Specifications – Part 2					
Item #	Who	Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
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 <u>Coupling</u> 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: <u>Trailer Air Coupling device removed</u> , MIRN Status = Decommissioned <u>Commissioned</u>	Same as item #21.

Ref #7 – B2B Service Order Specifications - Part 1

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)
25	Alinta	Page 8	Amend note for clarity.	<hr/> Note: * means that this is a parent JEC and this this JEC has <u>with four</u> character child JECs.	AEMO agrees with Alinta's proposal and will make this change to page 8 and 5.

SUBMISSIONS RECEIVED FOR IN009/10W AND IN010/20W

Section 1 – General comments on the proposed procedure change

Topic	Item#	Who	Response Received	AEMO response
<p>Sections 1 to 9 of the IIR sets out AEMO’s critical examination of the proposal. Does your organisation support AEMO’s examination of the proposal? If no, please specify areas in which your organisation disputes AEMO’s examination of the proposal and include information that supports your organisation’s rationale for not supporting AEMO’s examination.</p>	1	AGL	AGL believes that AEMO has reviewed the issue appropriately.	AEMO acknowledges that AGL believes AEMO has reviewed the issue appropriately.
	2	Alinta Energy	Alinta Energy supports the overall proposal to adopt the Customer Details Notification (CDN) and Customer Details Request (CDR) transactions in aseXML schema version r38.	AEMO acknowledges Alinta Energy’s support for the proposal.
	3	ATCO Gas	ATCO supports AEMO’s examination of the proposal. The uplift to schema r38 will require significant effort by ATCO to implement, we note the net benefits are likely derived by this initiative being included within AEMO’s consolidated program of works for 2021.	AEMO acknowledges ATCO Gas’s support for AEMO’s examination.
	4	Origin Energy	The IIR was reviewed and the Origin business have no further feedback.	Given Origin Energy’s support for the proposal in response to the PPC, AEMO acknowledges that Origin Energy’s position has not changed and therefore that Origin Energy continues to support the changes.
	5	Simply Energy	In line with Simply Energy’s submission for IN011/20, Simply Energy supports the proposal,	AEMO acknowledges Simply Energy’s support for the proposal, contingent on the proposal’s being implemented

			acknowledging the proposal's concurrent implementation with other proposed initiatives with schema impacts. In relation to the feedback provided by Simply Energy, for transaction T71 and terminology changes (MC, etc.), Simply Energy understands that it's been added to the "residual tidy-up" consultation for all east-coast schema initiatives and will consider Simply Energy's feedback as part of that consultation.	alongside other initiatives proposed for Q4 2021.
Sections 10 and 11 of the IIR sets out AEMO's recommendation. Does your organisation support AEMO's position to recommend the procedure changes?	6	AGL	AGL supports AEMO's proposed position.	AEMO acknowledges AGL's support for the initiative.
	7	Alinta Energy	We support including this work in the Q4 2021 east/west bundled program of work to ensure the most cost effective and efficient outcome for both AEMO and market participants	AEMO acknowledges Alinta Energy's support for the initiative.
	8	ATCO Gas	ATCO supports AEMO's position to recommend a procedure change to the ERA.	AEMO acknowledges ATCO Gas's support for the initiative.
	9	Simply Energy	Yes	AEMO acknowledges Simply Energy's support for the initiative.

Section 2 – Specific comments regarding RMP

Ref # 1 - AEMO Specification Pack - FRC B2B System Interface Definitions					
Ref	Participant	RMP Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
10	AGL	4.6.2	Minor editorial to clarify usage of CDN and CDR Responses.	<p><u>In SA, under the National Energy Retail Rules, the Retailer should</u></p> <ul style="list-style-type: none"> (i) <u>Initiate a CustomerDetailsNotification when customer details change; and</u> (ii) <u>Provide a CustomerDetailsNotification in response to a valid CustomerDetailsRequest</u> <p>under the National Energy Retail Rules, changes to Customer Contact details are to be supplied to the Network Operator.</p> <p>In SA, the Retailer must provide a CustomerDetailsNotification in response to a valid CustomerDetailsRequest.</p> <p>In WA, the Retailer may provide a CustomerDetailsNotification only in response to a valid CustomerDetailsRequest, <u>but should not initiate a CustomerDetailsNotification when customer details change.</u> See section 4.6.3 for further details on CustomerDetailsRequest.</p>	Given that this consultation is for WA, AEMO cannot consider changes that affect South Australia. AEMO will therefore add the proposed SA changes to the “residual tidy-up” consultation (IN018/20). Regarding the WA changes, AEMO considers that AGL’s proposal is implied by the existing text—i.e. if customer details change but no CDR has been submitted, then the clause as-proposed in the IIR would mean that the Retailer should not send a CDN. As such, AEMO believes this amendment is unnecessary and will not be adopting it.
11	AEMO	4.6.2	Minor editorial to align with the first paragraph in 6.2.1.	<u>In relation to the first paragraph in section 4.6.2 insert the words “planned works” after the words “in terms of handling”</u>	AEMO support this change.
12	AGL	4.6.2.1	Trigger	This interface is triggered	AEMO will make the proposed change but will add the following words

Ref # 1 - AEMO Specification Pack - FRC B2B System Interface Definitions

				<p>(i) when a Retailer makes a change to a MIRN's Customer details (for SA only); and</p> <p>(ii) In response to a CustomerDetailsRequest from the Network Operator</p>	<p>“(for WA only) after the words “from the network operators” in point (ii). Given that this consultation is for WA, AEMO cannot consider changes in (ii) that affect South Australia. AEMO will therefore add the proposed SA changes to the “residual tidy-up” consultation (IN018/20).</p>
13	AGL	4.6.3	<p>The CDR transaction has reason as Mandatory, but the enumerated reasons are listed; for clarity these reasons should be listed in the CDR table.</p> <p>The values provided have been sourced from the Electricity B2B Customer and Site Details. Alternatively, the Gas Procedures could point to the Electricity B2B procedures for these details.</p>	<p>Allowed values</p> <ul style="list-style-type: none"> • Returned Mail • Missing Customer Details • Confirm Life Support • No response to rejected CDN • Transfer Complete, no CDN Received • New Connection, no CDN Received • Data Quality Issue • Other • Rec – confirm no SensitiveLoad (Reconciliation only) (obsolete, no longer used for CDR) <p>Notes regarding the allowed values</p> <p>“Returned Mail” means the DNSP/MC/MPB has received returned mail with the current PostalAddress held by the DNSP/ MC/MPB.</p> <p>“Missing Customer Details” means the DNSP/ MC/MPB reasonably believes the customer details have changed</p>	<p>AEMO does not support this change. The allowable values are listed in Appendix A (Data Dictionary), as for other enumerated fields (such as “Reason for Read” in the MeterDataNotification transaction). To remain consistent with the rest of the document, therefore, AEMO will leave the allowable values listed only in Appendix A.</p>

Ref # 1 - AEMO Specification Pack - FRC B2B System Interface Definitions

				<p><u>and the Retailer has not provided a Notification of the Changes (e.g. move-in has occurred).</u></p> <p><u>“Confirm Life Support” means the MC/MPB requires confirmation of whether the Connection Point has a Life Support requirement or not. Only to be used if agreed between parties. Life support should be confirmed between a Retailer and DNSP using the LifeSupportRequest process in 4.6.</u></p> <p><u>“No response to rejected CDN” means that a DNSP/ MC/MPB has rejected a previous CDN where it was reasonably expected the Retailer would send through a new CDN with updated/corrected information, which has not yet been received.</u></p> <p><u>“Transfer Complete, no CDN Received” means a transfer has completed for the NMI and the DNSP/ MC/MPB believes a CDN has not yet been received within the allowed timeframe.</u></p> <p><u>“New Connection, no CDN Received” means a new connection has completed for the NMI and the DNSP/ MC/MPB believes a CDN has not yet been received within the allowed timeframe. The DNSP/ MC/MPB must provide which specific data they are querying in the SpecialNotes field.</u></p> <p><u>“Data Quality Issue” means that although the data may be technically correct, it may not be fit for purpose (e.g. phone number is 9999999). The DNSP/MC/MPB must provide which specific data they are querying in the SpecialNotes field.</u></p> <p><u>“Other” must only be used for scenarios not covered by the specified allowed values. The DNSP/ MC/MPB must provide the details of the reason in the SpecialNotes field.</u></p>	
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Ref # 1 - AEMO Specification Pack - FRC B2B System Interface Definitions					
				"Rec - confirm no SensitiveLoad" means the DNSP/ has a NMI is flagged for Life Support, but it was not included in the CustomerDetailsReconciliation transaction(s) provided by the Retailer.	
Ref # 2 - AEMO Specification Pack- Specification Pack Usage Guidelines					
14	AGL		Noted. Suggest that the final schema version for WA may be greater than r38.		AEMO notes AGL's comment and will amend the schema version number if the changes pursuant to IN002/15W, IN009/19W or IN010/20W proceed.

SUBMISSIONS RECEIVED FOR IN009/10W AND IN010/20W

Section 1A - General Comments on the IIR - Network Operator to provide meter status information in 4 existing transactions (IN009/19W).

Topic	Item#	Who	Response Received	AEMO response
<p>Sections 1 to 9 of the IIR sets out <u>AEMOs critical examination of the proposal</u>. Does your organisation supports AEMO's examination of the proposal? If no, please specify areas in which your organisation disputes AEMO examination proposal and include information that supports your organisation rational why you do not support AEMO examination.</p>	1	Alinta	<p>Alinta Energy supports the proposed changes set out in the IIR (for IN009/19W) to include the Meter Status field in the following network operator transactions:</p> <ul style="list-style-type: none"> • NMIDiscoveryResponse • NMIStandingDataResponse • MeterDataNotification / CSVConsumptionData • CSVHistoryResponseData 	AEMO acknowledges Alinta Energy's support for the proposal.
	2	AGL	AGL supports the review undertaken by AEMO	AEMO acknowledges AGL support of AEMO's review.
	3	OE	Origin agrees with AEMO's assessment of this initiative.	AEMO acknowledges that Origin agrees with AEMOs assessment.
	4	ATCO	ATCO supports AEMO's examination of the IN009/19W proposal as set out in Sections 1-9.	AEMO acknowledges ATCOs support for AEMO's examination.
<p>Section 10 and 11 of the IIR set out <u>AEMOs recommendation and timeframes</u>. Does your organisation supports AEMO position to recommend the procedures changes and the timeline for those procedures change to take effective?</p>	5	Alinta	Alinta Energy agrees with the changes proposed in the IIR for IN009/19W and with the proposal to bundle this program of work with the other programs of work noted for both the west and east coasts to ensure the most cost effective and efficient outcome for both AEMO and market participants	AEMO acknowledges Alinta's support for the proposal and that the proposal's being implemented alongside other initiatives proposed for Q4 2021.

	6	AGL	AGL supports these changes being 'bundled' with other system changes scheduled for Q4 2021.	AEMO acknowledges AGLs support for the proposal and that the proposal's being implemented alongside other initiatives proposed for Q4 2021.
	7	OE	Origin supports to bundle this change with the east coast Gas Life Support (GLS) changes (IN003/20) and with the east and west coast CustomerDetailsRequest (CDR) and CustomerDetailsNotification (CDN) transactions changes (IN011/20 and IN003/20W). Origin understands IN002/15W and IN026/15 (New JECs) is also incorporated with this bundled work package.	AEMO acknowledges Origin Energy's support for the proposal and that the proposal's being implemented alongside other initiatives proposed for Q4 2021.
	8	ATCO	ATCO supports the recommended procedure change and its inclusion into AEMO's consolidated programme of works planned to take effect in Q4 2021.	AEMO acknowledges ATCOs support for the proposal and that the proposal's being implemented alongside other initiatives proposed for Q4 2021.

Section 1B - Section 1B General Comments on the IIR - Add two new meter statuses to the existing enumeration list (IN010/20W)

Topic	Item#	Who	Response Received	AEMO response
Sections 1 to 9 of the IIR sets out <u><i>AEMOs critical examination of the proposal.</i></u> Does your organisation supports AEMO's examination of the proposal? If no, please specify areas in which your organisation disputes AEMO examination proposal and include information that supports your organisation rational why you do not support AEMO examination.	9	A;inta	Alinta Energy supports the proposed changes set out in the IIR (for IN010/20W) to add two additional codes to the Meter Status field: <ul style="list-style-type: none"> • Trailer AC (Trailer Air Coupling device installed) • No Reg (Regulator removed from meter) 	AEMO acknowledges Alinta Energy's support for the proposal.
	10	AGL	AGL supports AEMO's examination of this process.	AEMO acknowledges AGL support of AEMO's examination of the proposal.

	11	OE	See item #3	See item #3.
	12	ATCO	ATCO supports AEMO's examination of the IN010/20W proposal as set out in Sections 1-9.	AEMO acknowledges ATCOs support for AEMO's examination.
<p>Section 10 and 11 of the IIR set out <u>AEMOs recommendation and timeframes</u>.</p> <p>Does your organisation supports AEMO position to recommend the procedures changes and the timeline for those procedures change to take effective?</p>	13	Alinta	Alinta Energy agrees with the changes proposed in the IIR for IN010/20W and with the proposal to include the changes in the bundled east/west program of work.	AEMO acknowledges Alinta's support for the proposal and that the proposal's being implemented alongside other initiatives proposed for Q4 2021.
	14	AGL	AGL supports these changes being 'bundled' with other system changes scheduled for Q4 2021.	AEMO acknowledges AGLs support for the proposal and that the proposal's being implemented alongside other initiatives proposed for Q4 2021.
	15	OE	See item #7	See item #7.
	16	ATCO	ATCO supports the recommended procedure change and its inclusion into AEMO's consolidated programme of works planned to take effect in Q4 2021.	AEMO acknowledges ATCOs support for the proposal and that the proposal's being implemented alongside other initiatives proposed for Q4 2021.

ATTACHMENT D – IIRs for IN003/20W, IN002/15W, IN009/19W, and IN010/20W

Enclosed with this application.

ATTACHMENT E – Track-changed version of Scheme documents

Enclosed with this application.