

8 September 2022

For SA: Notice to all Registered Participants under the NGR

For SA, this Notice is to advise Participants on AEMO's decision to approve amendments to the:

- Retail Market Procedures (SA)

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 18 August 2022 for:

- IN002/21 (SA Proposed Date Change)

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, AGN, Alinta Energy, Origin Energy, and Red Energy / Lumo Energy. These submissions supported the majority of AEMO's proposed changes and suggested a number of minor changes to the draft Retail Market Procedure (RMP) documents for the purpose of clarifying the intent of the proposal.

The submissions received from AGL and Red and Lumo Energy raised issues of sufficient magnitude or complexity that additional consultation was warranted. As such, on 13 April 2022 AEMO issued a Notice of Time Limit Extension to allow for consideration of this feedback. AEMO incorporated most of these suggested changes into the draft RMP 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 the IIR. Submissions closed on 18 August 2022. AEMO received submissions from AGL, Origin Energy and Red and Lumo Energy (Red/Lumo). Each of these submissions were supportive of the proposal, with some additional amendments suggested by AGL and Red/Lumo.

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 documents mentioned above.

Having considered the feedback provided by each respondent, AEMO has approved the proposed amendments (Attachments A) of this Notice and has set the effective date for the changes to be 10 October 2022.

The updated version of the RMP will be published on the AEMO website prior to the effective date.

Should you require any further information please contact Jordan Daly on 0422 572 874.

ATTACHMENT A – DOCUMENTATION CHANGES

Changes are shown against v19.0 of the RMP (SA). Blue underline means addition and ~~red-strikeout~~ means delete. **Highlighted** changes are those that have been made between the IIR stage and publication of AEMO’s decision.

allowable period

~~In relation to a transfer request, the period commencing on the business day prior to the proposed transfer date and expiring~~ **The period of 102 days after the lodgement of a transfer request under clause 6.1.46.1.4.**

~~proposed transfer date
earliest transfer day~~

In relation to a transfer request, means the day nominated in that transfer request as the day with effect from which the User who delivers the transfer request to **AEMO** is to be registered in **AEMO’s metering register** as the current User for the supply point to which the transfer request relates. The date specified in a transfer request as the earliest day on which the transfer may take place (for a move in, this would generally be the date the Customer is moving into the premises), subject to clause 6.2.3(a)(vii).

proposed transfer date

In relation to a transfer request, means the day nominated in that transfer request as the day with effect from which the User who delivers the transfer request to **AEMO** is to be registered in **AEMO’s metering database** as the current User for the supply point to which the transfer request relates (for a move in, this would generally be the date the Customer is moving into the premises), subject to clause 6.2.3(a)(vii).

transfer time

The start of the gas day:

- (a) during which an actual meter reading for a basic-metered delivery point for which a transfer is pending, was undertaken; or
- (b) that an incoming User has specified as the proposed transfer date ~~earliest transfer day~~ for an interval-metered delivery point.

4.2.7. Re-energising delivery points

- (a) A Network Operator:
 - (i) may re-energise a *delivery point* when required to, or if not prevented, by law or a contract other than these Procedures; and
 - (ii) must (subject to law) re-energise a *delivery point* if required to under clause 4.2.8; and
 - (iii) must (subject to law), in response to a deemed request under clause 6.2.2(a), if a *transfer* has been marked as *pending* by AEMO under clause 6.6 for a *de-energised delivery point*, re-energise the *delivery point* either:
 - (A) on the *proposed transfer date earliest transfer day* nominated in the *transfer request* for the *delivery point*, if the Network Operator receives notification under clause 6.6(b)(iv) that the *transfer* has been marked as *pending* at least 2 *business days* before *proposed transfer date earliest transfer day*, or
 - (B) otherwise, within 2 *business days* after the Network Operator receives notification under clause 6.6(b)(iv) that the *transfer* has been marked as *pending*.

6.2. The Transfer Request

6.2.1. Transfer request

- (a) A *transfer request* must specify at least the following information:
 - (i) the *MIRN*;
 - (ii) the *proposed transfer date earliest transfer day*, and

Note: Unless a *special meter reading* is requested, the *transfer* of a *basic-metered delivery point* will take effect at the time of the next *scheduled meter reading* which occurs on, ~~or after~~ **or** for a *transfer that is not a move in transfer*, up to four *business days* before the *proposed transfer date earliest transfer day*, for a *transfer that is not a move in transfer* provided a *validated actual meter reading* is generated at that time.

Note: Under clause 6.2.3(a)(i), ~~the~~ *proposed transfer date earliest transfer day* must be no earlier than 5 *business days* after the date on which the *transfer request* is lodged (except where it is for a *move in*) and within the *allowable period*.

Note: For a *move in*, the *transfer* will take effect on the *move in date* or if there is no *deemed meter reading* or a *special meter reading* cannot be obtained on the *move in date*, it will take effect at the time a *special meter reading* is obtained under clause 6.5.2.

- (iii) whether the requested *transfer* is a *move in*.
- (b) By lodging a *transfer request* that is specified to be a *move in*, an *incoming User* represents to AEMO that the *transfer request* relates to a *move in*.

6.2.3. Requirements for transfer request

- (a) A *transfer request* is valid only if:
 - (i) the *delivery point* exists within AEMO's *metering database*;
 - (ii) the *MIRN status* is *energised* or *de-energised*;
 - (iii) there is not, in relation to the *delivery point*, an *open transfer request*;
 - (iv) there is not, in relation to the *delivery point*, an *open error correction transaction*;
 - (v) the *incoming User* is registered as a *User* and has a contract with a *shipper* for the haulage of *gas* to that *delivery point*;
 - (vi) if it is for a *move in* — the *delivery point* is *basic-metered*; and
 - (vii) the *proposed transfer date*~~*earliest transfer day*~~ is within the *allowable period* and occurs:
 - (A) if the *transfer request* is not for a *move in* — no earlier than 5 *business days* after the date on which the *transfer request* is lodged; and
 - (B) if the *transfer request* is for a *move in* — no earlier than the date on which the *transfer request* is lodged and the start of the allowable period is no earlier than the lodgement date.
- (b) Upon receipt of a *transfer request* which is not valid, AEMO must reject the *transfer request* and notify the *incoming User* that the *transfer request* has been rejected, specifying the reason why the *transfer request* is not valid.

6.2.4. Response to valid transfer request

- (a) Upon receipt of a valid *transfer request*, AEMO must accept the *transfer request* and:
 - (i) notify the *incoming User* that the *transfer request* has been accepted, specifying at least the following details:
 - (A) the unique identifier assigned by AEMO to the *transfer request*; and
 - (B) the process time of the *transfer request*;
 - (ii) notify the *Network Operator* that the *transfer request* has been accepted, specifying at least the following details:
 - (A) the *MIRN*; and
 - (B) the *incoming User*; and
 - (C) the *proposed transfer date*~~*earliest transfer day*~~; and

- (i) whether the *transfer request* is for a *move in*; and
- (E) the process time of the *transfer request*; and
- (F) the unique identifier assigned by AEMO to the *transfer request*;
- (iii) notify the *current User* that the *transfer request* has been accepted, specifying at least the following details:
 - (A) the *MIRN*; and
 - (B) the *proposed transfer date*~~*earliest transfer day*~~; and
 - (C) whether the *transfer request* is for a *move in*; and
 - (D) the process time of the *transfer request*; and
 - (E) the unique identifier assigned by AEMO to the *transfer request*; and
- (iv) if the *transfer request* is not for a *move in*, suspend the *transfer request* until lapse of the *transfer objection resolution period*.

6.4. Withdrawal of Transfer Request

6.4.1. Incoming User may withdraw transfer request

- (a) An *incoming User* may withdraw a *transfer request* for a *basic-metered delivery point* at any time before AEMO issues a *transfer confirmation* by lodging a *transfer withdrawal notice* with AEMO.
- (b) An *incoming User* may withdraw a *transfer request* for an *interval-metered delivery point* at any time up to two *business days* before the ~~*proposed transfer date*~~*earliest transfer day* specified in the *transfer request* by lodging a *transfer withdrawal notice* with AEMO.
- (c) A *transfer withdrawal notice* must correspond to an *open transfer request* previously lodged by the *incoming User*.

6.5.2. Network Operator may be required to undertake special meter reading for a move in

- (a) If a *transfer request* is for a *move in* and:
 - (i) the *Network Operator* reasonably determines that there is no prospect of determining a *deemed meter reading* under clause 3.1.3, for the ~~*proposed transfer date*~~*earliest transfer day*; and
Note: The *Network Operator* may make this determination if it determines that there is unlikely to be a *validated scheduled meter reading* or *special meter reading* in the 10 days before the *move in*.
 - (ii) no *scheduled meter reading* is scheduled for the ~~*proposed transfer date*~~*earliest transfer day*; and
 - (iii) no *special meter reading* has been requested (at least 2 *business days* prior to the ~~*proposed transfer date*~~*earliest transfer day*) by the *User*, for the ~~*proposed transfer date*~~*earliest transfer day*;then the *Network Operator* must undertake a *special meter reading*:
 - (iv) on the ~~*proposed transfer date*~~*earliest transfer day*; or
 - (v) if the ~~*proposed transfer date*~~*earliest transfer day* is less than 2 *business days* after AEMO gives notice under clause 6.5.1(b) that the *transfer* is *pending* — within 2 *business days* after receipt of the notice.
- (b) If a *transfer request* is for a *move in* and either:
 - (i) a *scheduled meter reading* is scheduled for, or not more than 10 days before, the ~~*proposed transfer date*~~*earliest transfer day*; or
 - (ii) a *special meter reading* has been requested (at least 2 *business days* prior to the ~~*proposed transfer date*~~*earliest transfer day*) for, or not more than 10 days before, the ~~*proposed transfer date*~~*earliest transfer day* by either the *current User* or the *incoming User*; or

- (iii) the *Network Operator* is required to undertake a *special meter reading* under paragraph (a)(iv) or (a)(v);

and the *Network Operator* fails to obtain a *meter reading* under at least one of sub-paragraphs (i), (ii) or (iii), then the *Network Operator* must notify the *incoming User* of the failure by the end of the next *business day*.

- (c) If, within 3 *business days* after notifying the *incoming User* under paragraph (b), the *Network Operator* receives a request from the *incoming User* to undertake a *special meter reading* for the *delivery point* the subject of the *transfer request*, the *Network Operator* must undertake a *special meter reading* as soon as practicable.
- (d) If AEMO does not receive an *actual meter reading* or a *substituted meter reading* within ~~7~~ *business days of the 7 days of the proposed transfer date*~~earliest transfer day~~, then AEMO must:
 - (i) cancel the *transfer request*; and
 - (ii) notify the *incoming User*, the *current User* and the *Network Operator* that the *transfer request* has been cancelled.

6.8.2. The transfer

- (a) If a *transfer* is *pending* for a *basic-metered delivery point* and AEMO receives *metering data* based on an *actual meter reading* for the *delivery point*:
 - (i) within the *allowable period*; and
 - ~~(ii)~~ which would result in the *transfer day* being on, ~~or after, or, for a transfer that is not a move in transfer, up to four business days before, the proposed transfer date for a transfer that is not a move in transfer~~ *earliest transfer day*;
 - ~~(iii)~~(ii) then the *transfer* takes effect as from the *transfer time*, and AEMO must give a *transfer confirmation* to the *incoming User*, the *Network Operator* and the *current User* by:
 - ~~(iv)~~(iii) if AEMO received the *metering data* before 5.00 pm on a day — before the start of the next *gas day*; and
 - ~~(iv)~~(iv) otherwise — before the start of the second *gas day* after receipt of the *metering data*.

Note: The *transfer day* is the *gas day* upon which the *actual meter reading* is obtained. The *incoming User* is responsible for all transportation and haulage charges to and all *gas* withdrawals from the *delivery point* from the beginning of the *transfer day*.

Note: Upon accepting *metering data* under this clause, AEMO must update its *metering database*.

ATTACHMENT B – Consolidated Feedback

Consolidated feedback for IN002/21 Impact and Implementation Report (IIR) (SA Proposed Date Change)

Section 1 - General Comments on the Impact and Implementation Report

Topic	Item #	Who	Response Received	AEMO's response
<p>Sections 1 to 8 of the IIR sets out details of the proposal.</p> <p>Does your organisation support 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 why you do not support AEMO's assessment.</p>	1.	AGL	<p>AGL generally agrees with AEMO's assessment of the proposal and supports making transfers in SA more efficient.</p> <p>The scope of this proposal was to speed up in-situ transfers, not all transfers and AGL does note that the proposed drafting has unintended consequences for move-in transfers versus in-situ transfers.</p>	<p>AEMO notes AGL's support for the proposal.</p> <p>With regards to AGL's note, please see item #8.</p>
	2.	Origin	<p>Origin supports AEMO's assessment of the proposal.</p> <p>We understand that AEMO have been in recent discussions with other gas participants to potentially improve the procedure drafting. Consequently, we support AEMO to evaluate any new drafting that may help clarify that this procedure change applies to in-situ transfer only.</p>	<p>AEMO notes Origin's support for the proposal and AGL's proposed drafting.</p>

	3.	Red/Lumo	<p>Red Energy and Lumo Energy (Red and Lumo) support the proposed changes to the Retail Market Procedures (SA) (RMP (SA)) on the condition that where the requested transfer is a move in, The transfer continues to take effect from the move in date (RMP6.2.1) and not up to four business days before the proposed transfer date. Should a move in transfer complete for a date prior to the move in date Retailers may not have sufficient injections in place to support the withdrawals of their customer as required by RMP 8.2.1 and may arguably not have a contract in place as required by NERR 57(1)(b). Furthermore a move in date four business days before the proposed transfer date is likely to have a detrimental effect on customer experience. Consumers are unlikely to understand or accept billing periods which begin before they have requested connection or moved into their property. Red and Lumo are concerned that this potential issue would actually risk countering one of the stated benefits of the proposal; improved customer experience for non-move in customers.</p> <p>RMP (SA)</p> <p>8.2. User Obligations for Non-STTM Sub-networks</p> <p>8.2.1. Injections to match required withdrawals</p>	<p>AEMO notes Red and Lumo’s support for the proposal. With regards to move-in transfers, please see AEMO’s response given in Ref #8.</p>
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			<p>(a) For each sub-network for each gas day, a User must procure the injection into the subnetwork of an amount of gas equal to its good faith estimate of its likely User's required withdrawals for the sub-network for the gas day</p> <p>NERR57 Retailer obligations in relation to customer transfer</p> <p>(1) A retailer must not submit a request for the transfer of a small customer under the relevant Retail Market Procedures unless:</p> <p>(b) the retailer has a customer retail contract in place to enable the sale of energy to the customer at their premises.</p>	
Section 9 and 10 of the IIR set out AEMO's recommendation and timeframes. Does your organisation supports AEMO position to recommend the procedures changes and the timeline for those procedures change to take effective?	4.	AGL	AEMO generally supports the proposed procedure change but with some specific reservations and proposals to remove the early transfer issue associated with move-in transfers, but retain the current processes for move-in transfers.	AEMO notes AGL's support for the proposal. With regards to AGL's note, please see item #8.
	5.	Origin	Yes	AEMO notes Origin's support for the proposal.
	6.	Red/Lumo	Red and Lumo in principle support the changes however further amendment to the SARMP is required to ensure a move in transfer continues to take effect	AEMO notes Red and Lumo's support for the proposal. With regards to

			<p>from the move in date and not up to four business days before the proposed transfer date. Red and Lumo also note that there has been a potential solution (6.8.2) proposed by AGL (shared with the GRCF on 16/AUG/22) which would limit this.</p>	<p>AGL's note, please see item #8.</p>
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Section 2 – (Optional) Feedback on the documentation changes in the Attachments of the IIR.

Retail Market Procedures (SA)					
Item #	Who	RMP Clause #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response
7.	Red/Lumo	3.1.3	An alternative approach to consider might have been to make a change to the Deemed meter readings which would not require a change to earliest transfer day. This change would presumably not have impacted Retailers or AEMO, though it may have required a system change by AGN.	<p>3.1.3. Deemed meter readings</p> <p>(a) If an actual meter reading for a basic-metered delivery point was undertaken no more than 10 days before the date of move in, then(subject to paragraph (b)) on the date of move in:</p> <p>(i) the Network Operator must determine a “deemed meter reading” which is a meter reading deemed to have occurred on the day of the move in; and</p> <p>(ii) provide the metering data from the deemed meter reading to AEMO.</p> <p><u>(b) The deemed meter reading is the most recent index reading from a validated actual meter reading which occurred no more than 10 days before the move in.</u></p> <p><u>(c) If an actual meter reading for a basic-metered delivery point was undertaken no more than 4 days before the earliest transfer</u></p>	AEMO notes Red/Lumo’s response. This alternative approach has been made redundant by AGL’s suggestion (see Ref #8). As such, AEMO will not reflect this proposal in the RMP

				<p><u>day, then(subject to paragraph (d)) on the earliest transfer day:</u></p> <p><u>(i) the Network Operator must determine a “deemed meter reading” which is a meter reading deemed to have occurred on the earliest transfer day; and</u></p> <p><u>(ii) provide the metering data from the deemed meter reading to AEMO.</u></p> <p><u>(b) The deemed meter reading is the most recent index reading from a validated actual meter reading which occurred no more than 4 days before the earliest transfer day.</u></p>	
8.	AGL	6.2.1	<p>Adjust so that the application of the -4 b/days applies to in-situ transfers only per scope of change. include the words: <u>for a transfer that is not a move in transfer</u></p>	<p>6.2.1. Transfer request (a) A transfer request must specify at least the following information: (i) the MIRN; (ii) the <u>proposed transfer date</u> earliest transfer day; and Note: Unless a special meter reading is requested, the transfer of a basic-metered delivery point will take effect at the time of the next scheduled meter reading which occurs on, or after <u>or, for a transfer that is not a move in transfer, up to four business days before the proposed transfer date</u> earliest transfer day, provided a validated actual meter reading is generated at that time. Note: Under clause 6.2.3(a)(i), on a proposed transfer date <u>earliest transfer date</u> must be no</p>	<p>AEMO notes AGL’s response. This amendment is consistent with the intent of the proposal and clarifies the drafting without introducing additional obligations. The RMP have been updated to reflect this.</p>

				<p>earlier than 5 business days after the date on which the transfer request is lodged (except where it is for a move in) and within the allowable period.</p> <p>Note: For a move in, the transfer will take effect on the move in date or if there is no deemed meter reading or a special meter reading cannot be obtained on the move in date, it will take effect at the time a special meter reading is obtained under clause 6.5.2.</p>	
9.	AGL	6.8.2	<p>Adjust so that the application of the -4 b/days applies to in-situ transfers only. Include the words:</p> <p><u>for a transfer that is not a move in transfer</u></p>	<p>6.8.2. The transfer</p> <p>(a) If a transfer is pending for a basic-metered delivery point and AEMO receives metering data based on an actual meter reading for the delivery point:</p> <p>(i) within the allowable period; and</p> <p>(ii) which would result in the transfer day being on, or after <u>or, for a transfer that is not a move in transfer, up to four business days before the proposed transfer date</u> earliest transfer day,</p> <p>.....</p>	<p>AEMO notes AGL's response. Please see Ref #8.</p>