

IMPACT & IMPLEMENTATION REPORT (IIR)

Issue number	IN005/21		
Impacted jurisdiction(s)	New South Wales/Australian Capital Territory (NSW/ACT)		
Proponent	Carol Poon	Company	Australian Energy Market Operator (AEMO)
Affected gas market(s)	Retail	Consultation process (ordinary or expedited)	Ordinary
Industry consultative forum(s) used	GRCF	Date industry consultative forum(s) consultation concluded	Wednesday, 9 March 2022
Short description of change(s)	Remove NSW/ACT Lost Gas Customer Service Protocol (LGCSP)		
Procedure(s) or documentation impacted	Retail Market Procedures (NSW and ACT).		
Summary of the change(s)	Amend Retail Market Procedures NSW/ACT to remove Chapter 10 to end the formal Lost Gas Customer Service Protocol (LGCSP) process.		
IIR prepared by	Nandu Datar	Approved by	Meghan Bibby
Date IIR published	23 March 2022	Date consultation concludes	22 April 2022
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IMPACT & IMPLEMENTATION REPORT

CRITICAL EXAMINATION OF PROPOSAL

1. DESCRIPTION OF ISSUE

According to the Chapter 10 of the Retail Market Procedure (RMP) NSW/ACT, AEMO may provide a service that enables a customer to find out the identity of the current FRO of the delivery point at which that customer is supplied with gas (“lost *gas* customer service”). The lost gas customer service must be provided in accordance with a protocol LGCSP.

As per the current process, a gas customer can contact any Retailer or the Energy and Water Ombudsman NSW (EWON) to find out the identity of their current retailer within one business day. This formalised process ensures that a NSW/ACT gas customer is never placed in a position where they do not know the identity of their current Retailer for a sustained period of time.

In situations where the gas delivery point identifier is known, the customer’s Retailer can be identified by querying the AEMO’s NSW/ACT Gas Retail Market Business System (GRMBS).

Where the delivery point identifier is not known but the street address of the property with the gas connection is known, the customer’s Retailer may be identified either by interrogating the relevant Network Operator’s on-line system (where such access is available) or liaising directly with the relevant Network Operator.

Initially, AEMO requested feedback on the following proposal in Gas Market Issue (GMI) consultation.

1. Formalising the temporary work around: Due to the termination of access to NSW/ACT Network Operator’s online system in 2016, AEMO implemented a temporary workaround to overcome this issue by accessing the Complete MIRN listing provided by the relevant Network Operator. To formalise the workaround AEMO must update the LGCSP. Updating the LGCSP must be agreed by the EWON and GRCF participants.
2. Removing the requirement for GRCF Consultation when amending the LGCSP: AEMO consulted with internal stakeholders and proposed that any future changes to the LGCSP will not require to undergo a formal GRCF consultation. Any future proposed changes will be reviewed and agreed via a circular resolution between AEMO and EWON. AEMO proposed to remove the requirement for formal GRCF consultation from the Retail Market Procedures (RMP) NSW/ACT.
3. Removing Chapter 10 of RMP NSW/ACT: The changes proposed in this initiative make requirements in Chapter 10 of the RMP NSW/ACT redundant.

Feedback from the participants proposed removing the LGCSP process. EWON could seek resolution of a query from a lost gas customer from the relevant Network Operator.

The changed proposal seeks approval from EWON and the GRCF participants for the following:

- Delete Chapter 10 from RMP NSW/ACT to remove the formal LGCSP process; and
- Remove LGCSP process.

AEMO discussed the suggested change to the original solution covered by the GMI with EWON and the Network Operators, Jemena and AGIG.

EWON indicated they had no objections in principle to removing the protocol. They also noted that in practice they are most likely to contact the Network Operator anyway. AEMO responded that the National Energy Retail Law (NERL) clause 85 covers the obligation on the Network Operator to provide details of a customer’s Retailer when requested by EWON.



Jemena and AGIG indicated that they are generally supportive of the proposal. Jemena also noted that they anticipate that this initiative would create minimal in-practice change, given the very low volumes of EWON requests.

1.1. Invitation to provide feedback.

Anyone wishing to make a submission for this IIR consultation is requested to use the response template provided in Attachment A. Submissions close 22 April 2022 and should be e-mailed to grcf@aemo.com.au.

2. REFERENCE DOCUMENTATION

- Retail Market Procedures (NSW and ACT) v27.0

3. OVERVIEW OF CHANGES

The proposed change involves:

1. deleting Chapter 10 from the RMP NSW/ACT;
2. discontinuing the use of LGCSP. Under National Energy Retail Law (NERL) (section 85), the EWON can approach the Network Operator on behalf of the customer for the purpose of identifying their Retailer; and
3. EWON adopt the practice of contacting the Network Operator.

4. OVERALL COST AND BENEFITS

Implementation of this initiative is expected to deliver the following benefits:

- Speed up the resolution of a lost gas customer query.
- Eliminate duplication of processes, where EWON approaches AEMO and in some cases AEMO may need to approach the Network Operator to determine the customer's Retailer.
- Harmonise with other east coast jurisdictions since the protocol only exists in NSW/ACT.

AEMO considers this initiative will require the minor process change for EWON where resolution of lost gas customer queries will be sought from the Network Operator instead of AEMO.

There are no anticipated system changes for AEMO or participants because of this proposed change.

5. MAGNITUDE OF THE CHANGES

Given that the change requires no system changes for any Network Operator or AEMO, AEMO believes the magnitude of this change to be "non-material".

6. CONSISTENCY WITH NATIONAL GAS RULES (NGR) AND NATIONAL GAS OBJECTIVE (NGO)

As part of the first-round consultation (PPC), AEMO put forward the following assessment regarding compliance with section 135EB of the National Gas Rules:



Consistency with National Gas Law (NGL) and NGR	AEMO's view is that the proposed change is consistent with the NGL and NGR. No participant raised any objections during the consultations listed in Section 1.1 and participants will be given an opportunity during this PPC consultation to inform AEMO if they believe there is such an inconsistency.
National Gas Objective	As outlined in Section 4 and 5, AEMO's view is that the proposed change will help achieve the National Gas Objective through two mechanisms: <ol style="list-style-type: none"> 1. Improving the efficiency of the operation of the gas market by speeding up the resolution of query. 2. Achieve harmony with other east coast jurisdictions.
Any applicable access arrangements	AEMO's view is that the proposed change is not in conflict with existing Access Arrangements. Participants will be given an opportunity during this IIR consultation to inform AEMO if they believe the proposed change is in conflict with existing Access Arrangements.

No participant submitted any opposing views in relation to AEMO's assessment during the first-round consultation. AEMO therefore maintains its assessment as described above.

7. CONSULTATION FORUM OUTCOMES

There were six submissions to the PPC consultation from AGL, Alinta, Origin, Red and Lumo Energy, Jemena and EWON. All submissions supported the proposed changes and requested no further amendments. Jemena and Red/Lumo provided additional comments.

8. SUPPORTING DOCUMENTATION

Refer to:

- Attachment B Proposed amendments to the RMP NSW/ACT.
- Attachment C Responses given to PPC.

9. SHOULD THE PROPOSED PROCEDURES BE MADE?

AEMO recommends the changes proposed in Attachment B to progress. No further changes were proposed in the participant feedback to the PPC.

10. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO proposes the following timeframe:



- Issue IIR on 23 March 2022.
- IIR consultation closes on 22 April 2022.
- Notice of AEMO Decision issued 11 May 2022.
- Notice of Effective Date issued by mid-June 2022.
- Target effective date Monday 4 July 2022.



ATTACHMENT A – IIR RESPONSE TEMPLATE

The IIR response template has been attached separately to this document. There are two sections in the template:

- Section 1 seeks feedback on AEMO’s examination of the proposal in Sections 1–9 (i.e. whether AEMO has correctly captured the requirements and surrounding context of the proposal).
- Section 2 seeks feedback on the proposed RMP changes themselves (i.e., whether the drafted RMP changes accurately reflect the proposal in the IIR).

Anyone wishing to make a submission to this IIR consultation are to use this response template.

Submissions close 22 April 2022 and should be emailed to grcf@aemo.com.au.



ATTACHMENT B – DOCUMENTATION CHANGES

Changes are shown against v26.0 of the RMP (NSW/ACT). Blue underline means addition and ~~red-strikeout~~ means delete.

Extract from Retail Market Procedures (NSW/ACT)

1.1.2 Wagga Wagga and Tamworth

- (c) The following provisions of these Procedures apply to *Network Operators* in respect of the Wagga Wagga and Tamworth *network sections*:
- (i) this clause 1.1.2;
 - (ii) clause 1.2.1 (Definitions) – the definitions of *business day*, *gas day*, *hot water meter* and all other defined terms necessary to give meaning and effect to this clause 1.1.2, including any provision specified in this paragraph (c);
 - (iii) clause 1.2.2 (Interpretation);
 - (iv) clause 3.6.4 (Calculation of energy data – hot water meters), consistent with the calculation in example 5 of clause 1.2.2(g) and as if the *common factor* were the water conversion factor as defined in that example;
 - (v) clause 4.2(b) (De-energising or disconnecting basic meters by Users);
 - (vi) clause 4.3 (Meter upgrade or downgrade), provided that the time by which the *Network Operator* is to provide information under paragraphs (c) and (d) is 5.00 pm on the 2nd *business day* before the relevant *meter* is to be upgraded or downgraded (as applicable), not the 2nd *business day* afterwards;
 - (vii) Chapters 6 and 11 (Customer transfer process and Customer transfer error correction process), subject to paragraph (f);
 - (viii) There is no clause 1.1.2 (c) (viii)
 - ~~(viii) Chapter 10 (Lost gas customer process); and~~
 - (ix) Attachment 4 (Wagga Wagga and Tamworth information);

CHAPTER 10. THERE IS NO CHAPTER 10

~~CHAPTER 10.LOST GAS CUSTOMER PROCESS~~

~~10.1 Lost Gas Customer Service Protocol~~

- ~~(a) AEMO may provide a service that enables a Customer to find out the identity of the current FRO of the delivery point at which that Customer is supplied with gas ("lost gas customer service").~~
- ~~(b) The lost gas customer service must be provided in accordance with a protocol ("Lost Gas Customer Protocol").~~



10.1.1 Amendment

~~The Lost Gas Customer Protocol may only be amended by AEMO when such amendments are agreed with the recognised energy industry ombudsman for New South Wales and after undertaking one of the following consultative processes:~~

- ~~(a) — the ordinary process for making Procedures under section 135EE of the Rules; or~~
- ~~(b) — the expedited process for making Procedures under section 135EF of the Rules.~~

10.1.2 Publication

~~AEMO must publish the Lost Gas Customer Protocol as amended from time to time.~~

10.1.3 Effect

~~Network Operators, Retailers and AEMO must comply with, and are bound by, the Lost Gas Customer Protocol in respect of the provision of information, giving of notice, delivery of notices or documents and making of requests, and the receipt of information, notices and documents or requests.~~

ATTACHMENT C – FEEDBACK GIVEN TO PPC

Section 1 - General Comments on the Proposed Procedure Change

Topic	Ref #	Participant	Response	AEMO Response
Sections 1 to 9 of the PPC sets out details of the proposal.	1	AGL	AGL agrees with AEMO that the Lost Gas Customer Process can be retired. The requirements have reached a small number and this will align the issue to processes in other gas markets.	AEMO notes AGL's support of the proposal.
Does your organisation support AEMO's assessment of the proposal?	2	Alinta	Yes. Alinta Energy supports the proposal.	AEMO notes Alinta's support of the proposal.
If no, please specify areas in which your organisation disputes AEMO's assessment (include PPC section reference number) of the proposal and include information that supports your organisation's rationale for not supporting AEMO's assessment.	3	Origin	Origin supports AEMO's assessment based on participant feedback to delete chapter 10 and alternative method for EWON to request lost gas customer information	AEMO notes Origin's support of the proposal.
	4	Jemena	<p>JGN is supportive of the proposal on the basis of:</p> <ul style="list-style-type: none"> • anticipated low annual request volumes; • no identified conflict with Access Arrangements; and • no anticipated case charges being applied by EWON onto Jemena for these requests. <p>National Energy Retail Law (NERL) clause 85 covers the obligation on Retailers and Network Operators to provide details of a customer's Retailer when requested by EWON.</p> <p>National Energy Retail Rules (NERR) Rule 101 (1) provides for a shared customer to obtain assistance to resolve an enquiry.</p> <p>There is a very low probability of the Network Operator record of the current FRO being temporarily not aligned with AEMO's records at points in time e.g.</p>	AEMO notes Jemena's comments and support of the proposal.

Topic	Ref #	Participant	Response	AEMO Response
			<p>error correction transfer in-flight, transfers in-flight or COM transactions not received or not processed.</p> <p>AEMO's registry is the market source of truth for the MIRN to FRO relationship. B2B transactions, retailer and network operator systems and processes follow this primacy.</p> <p>There may be circumstances relating to EWON requests (albeit very low volume) where the Network Operator needs to confirm with AEMO the current FRO or the FRO history. There is an established email request to AEMO Support Hub process to cover these circumstances.</p> <p>Based on the above, AEMO's ongoing (albeit indirect) support of this process will reduce considerably, however may not out-turn to be zero.</p> <p>The efficacy of the process can be improved if the requesting customer/EWON can also provide a meter number in addition to sole reliance on premises address.</p>	
	5	Red Energy and Lumo Energy	<p>In supporting AEMO's assessment of the proposal, Red Energy and Lumo Energy (Red and Lumo) recognise that discontinuing the use of the Lost Gas Customer Service Protocol (LGCSP) removes a documented avenue of communication between AEMO and the Energy and Water Ombudsman of NSW (EWON).</p> <p>In the interests of transparency, Red and Lumo request that, should AEMO establish a Memorandum of Understanding for any ongoing relationship between AEMO and EWON, it be published on the AEMO website and shared with the GRCF.</p>	AEMO notes Red and Lumo's comments and support of the proposal.
	6	EWON	We're fine with the proposal.	AEMO notes EWON's support of the proposal.