



# Impact & Implementation Report (IIR)

<b>Ref# (if applicable)</b>	2023 Package 6 – WA minor changes (IN009/20W, IN002/22W, IN002/23W and IN001/24W)		
<b>Impacted jurisdiction(s)</b>	Western Australia (WA)		
<b>Proponent</b>	AEMO	<b>Company</b>	AEMO
<b>Proponent email</b>	<a href="mailto:grcf@aemo.com.au">grcf@aemo.com.au</a>		
<b>Affected Gas Market(s)</b>	WA Retail	<b>Consultation process (ordinary or expedited)</b>	Ordinary
<b>Industry consultative forum(s) used</b>	GRCF	<b>Date industry consultative forum(s) consultation concluded</b>	26 April 2024
<b>Short issue title</b>	Minor non-controversial changes to the WA Retail Market Procedure (RMP) and Technical Protocol (TP) to provide further clarity to various clauses, address potential gaps and update details so that they reflect current situation.		
<b>Procedure(s) or Documentation impacted</b>	Please refer to section 2		
<b>IIR prepared by</b>	Nandu Datar	<b>Approved by</b>	Meghan Bibby
<b>Date IIR published</b>	6 May 2024	<b>Date consultation concludes</b>	3 June 2024
<b>Other key contact information</b>			

## [aemo.com.au](http://aemo.com.au)

New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia  
Australian Energy Market Operator Ltd ABN 94 072 010 327

## Impact & Implementation Report (IIR) – Detailed Report Section

### Critical Examination of Proposal

#### 1. Description of issue

This Impact and Implementation Report (IIR) proposes amendments to the documentation<sup>1</sup> that are minor in nature. Section 3 of this IIR contains further information about each of the issues and a brief explanation of the specific changes. Attachment A of this IIR contains amendments for each of the proposed changes. If approved these changes will provide further clarity to some of the clauses, address potential gaps and update details so that they reflect current business process in the WA retail gas market.

##### 1.1. Background.

At the Gas Retail Consultative Forum (GRCF) prioritisation session held in November 2022, participants supported AEMO's proposal of bundling of like for like initiatives for 2023. Package 6 is centred around providing further clarity to some of the RMP clauses and updates to reflect current business process in relation to WA. Further analysis of initiatives on the register identified another initiative that require fixing of minor errors in the TP documents.

##### 1.2. How to make a submission

Anyone wishing to make a submission to this second stage consultation are requested to use the response template provided in Attachment B. Submissions close **COB 3 June 2024** and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

**IMPORTANT:** The scope of works is limited to the initiatives described above. The scope maybe expanded to pick up other minor typographical errors that are identified. A more thorough review of the other sections of the RMP or TPs is out of scope for this consultation.

#### 2. Reference documentation

- Retail Market Procedures (WA) Ver 8.0
- B2B Service Order Specifications (WA Only) – Part 1 Ver 2.5
- FRC B2B System Interface Definitions Ver 5.1
- Specification Pack Usage Guide Ver 8.7

---

<sup>1</sup> See section 2 for details on which document are impacted by these changes.

### 3. Overview of changes

The following proposals and the document/s impacted are summarised in the table below, and detailed in the following sections:

ID	Title	Participant System Impact	Documentation Impact
IN009/20W	Typographical error in 'Auditor's deed of undertaking'	No	Retail Market Procedures (WA)
IN002/22W	Issue with WA participant deregistration	No	Retail Market Procedures (WA)
IN001/24W	Fix clause numbering in Appendix 2 of RMP WA	No	Retail Market Procedures (WA)
IN002/23W	Fix minor documentation errors in WA Technical Protocol	No	FRC B2B System Interface Definitions B2B Service Order Specifications (WA Only) – Part 1

#### 3.1. IN009/20W - Typographical error in 'Auditor's deed of undertaking'

AEMO is the proponent of this change. Clause 9 in Appendix 4 of the RMP WA relates to the Covenantor having to provide a Report to the Covenantee. It refers to clause 359 of the RMP WA for the Report required. Clause 359 refers to the 'Level of Audit' whereas the Report required is referred in clause 358.

Also, clause 9 in Appendix 4 specifies a period of 2 months within which the report should be provided to AEMO. The business practice has always required the WA participants to provide the report within 3 months after the end of the year.

The IIR proposes amending:

- clause 9 in Appendix 4 to refer to clause 358 instead of 359; and
- the period to 3 months instead of current 2 months.

Please refer to Attachment A for the proposed changes.

#### 3.2. IN002/22W - Issue with WA participant deregistration

AEMO is the proponent of this change. During the APT Facility Management deregistration, AEMO identified a potential gap in the requirement of clause 377B(2)(b)(i) of the RMP WA. The purpose of this clause is to cover the reconciliation period and should include the allocation of User's Reconciliation Adjustment Amount (URAA) or Swing Service Repayment Quantity (SRQ). The clause covers the reconciliation period but not the allocation of URAA (as per clause 245 of WA RMP) or SRQ (as per clause 298 of WA RMP).

The IIR proposes making a minor change to clause 377B(2)(b)(i). The change involves adding 3 days to calculate and pay the URAA and SRQ. This would allow for URAA allocated for any reconciliation amount generated in the 425 day reconciliation period since the user ceased to be active (i.e. be a FRO) and any SRQ repayment. Please refer to Attachment A for the proposed change.

[aemo.com.au](http://aemo.com.au)

New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia  
Australian Energy Market Operator Ltd ABN 94 072 010 327

### 3.3. IN001/24W - Fix clause numbering in Appendix 2 of RMP WA

The proponent for this change is AEMO. While determining the changes for a separate initiative IN002/21W (Anticipated annual consumption for basic meters), AEMO identified minor issues with clause 16 and Appendix 2 of RMP WA. The minor issues were as follows:

- Incorrect title for clause 16.
- Clause numbering missing in Appendix 2.

The version of the RMP WA that AEMO inherited from the previous market operator REMCo had these minor issues which were not identified when the transition occurred.

AEMO has proposed the changes required to clause 16 and reintroduction of numbering in Appendix 2 of RMP WA to rectify the issues identified above. The original title of clause 16 was **'Rule change procedure does not apply to amending and updating appendices.'** AEMO is proposing to change this title to **'Chapter 9 (Procedure change process) does not apply to amending and updating Appendices'** which reflects the current terminology in use. Please refer to Attachment A for the proposed changes.

### 3.4. IN002/23W – Fix minor documentation errors in WA Technical Protocol

AEMO is the proponent of this change. This change corrects a minor discrepancy between TP documents:

- B2B Service Order Specifications (WA Only) – Part 1; and
- FRC B2B System Interface Definitions that was first raised with AEMO in mid-2023.

It related to LoadDetails/PerAnnum field in the Service Order Request (SOR) information Retailers send to the Distributor ATCO.

This minor discrepancy exists in the TP documents that AEMO inherited from previous market operator REMCo. ATCO provided the following corrections to the discrepancies.

- The LoadDetails/PerAnnum field is 'Required' in FRC B2B System Interface Definitions and 'Optional' in B2B Service Order Specifications for new connection service orders with codes 'SCR/CLT/ECO' and for meter/pressure upgrades with code 'UMS'. The Distributor ATCO has confirmed that they need to be 'Required' in both documents.
- Replace one of the duplicate occurrences of the code 'CLT' with 'SCR' and the invalid code 'SCF' with 'TCR' in the FRC B2B System Interface Definitions.

The IIR proposes amending the LoadDetails/PerAnnum field in the 2 TP documents to remove the discrepancies noted above. Please refer to Attachment A for the proposed changes.

## 4. Likely implementation requirements and effects

AEMO has determined that the proposed changes in this IIR are mainly documentation changes and may require very minor process changes.

### IN009/20W

No impact on any participant. The changes will give more clarity and align the procedure with on-going business practice of providing the audit report to AEMO within 3 months instead of 2 months.

**IN002/22W**

No impact on any participant. For AEMO there is a minor process change which will ensure the last allocation of URAA and SRQ is covered before the deregistered participant exits the market.

**IN001/24W**

No impact on any participant. This change will fix the documentation errors and provide clarity to procedure change requests processed by AEMO.

**IN002/23W**

Minor process changes for participants so that correct service order request code is used in service orders.

## 5. Overall cost and benefits

AEMO expects there will be negligible implementation costs since none of the changes proposed in this IIR require substantial process changes.

Inclusion of the proposed Technical Protocol and Procedure changes will eliminate any consideration of an administrative non-compliance and allow participants and AEMO to operate in an effective and efficient manner.

The benefits are likely to be realised as follows:

- Enable consistency between business practice and procedure about when an audit report must be provided by a participant.
- Ensure a deregistered participant exits the market after all URAA and SRQ has been allocated.
- Ensure service orders are raised with correct service order request code.
- Fix typographical errors and give more clarity to future procedure change consultations involving changes to the appendices in the RMP WA.

## 6. Magnitude of the changes

AEMO expects there will be negligible implementation costs since none of the changes proposed in this IIR require substantial process changes and considers the magnitude of this change to be **non-material**. If a participant believes that any of the proposed changes are material, this feedback needs to be included in the Attachment B response template.

## 7. AEMO'S preliminary assessment of the proposal's compliance with clause 378 of the RMP

Regarding the changes in WA, AEMO's preliminary assessment of the proposal's compliance with clause 378 of the RMP (WA) is:

Requirement	AEMO's Preliminary Assessment
Ensure that the retail gas market operates and is governed in a manner that is: <ul style="list-style-type: none"> <li>(i) open and competitive;</li> <li>(ii) efficient; and</li> <li>(iii) fair to participants and their customers.</li> </ul>	AEMO's view is that the proposed changes will continue to promote competition, properly reflects operational practices, and will not disadvantage participants or their customers.
Ensure compliance with all applicable laws.	AEMO's view is that the proposed changes are consistent with the applicable laws, and participants will be given an opportunity during this IIR consultation to inform AEMO if they believe the proposed change is in conflict with any applicable laws.
Ensure effective consultation occurs and gives stakeholder's opportunities to provide feedback of the proposed changes.	AEMO's view is that this IIR consultation and the previous PPC consultation, in addition to the discussions at the GRCF, has provided adequate opportunities for participants to provide feedback on the proposed changes.

If any participant believes that any of the above AEMO views are contentious, this feedback needs to be included in the Attachment B response template.

## 8. Consultation forum outcomes

The PPC was issued on 11 April 2024 and submissions in response to it were due by COB 26 April 2024.

AGL, Alinta, ATCO, Origin and Synergy submitted feedback to the PPC indicating their support for the proposed changes and raised no further issues or changes. Participant feedback and AEMO's response to the feedback has been included in Attachment C.

## Impact & Implementation Report – Recommendation(s)

### 9. Should the proposed procedures be made?

AEMO recommends making the changes proposed in Attachment A.

### 10. Proposed timelines

Subject to all necessary approvals including an approval by ERA, AEMO is targeting to implement this change by mid September 2024.

In order to achieve this timeline, AEMO proposes the following key milestones:

- IIR issued 6 May 2024
- IIR feedback closes 3 June 2024
- ERA submission issued end June 2024
- ERA decision expected end August 2024
- Proposed effective date of Procedures to be mid September 2024 subject to approval by ERA

## Attachment A – Marked up Changes (see section 3)

Blue underline represents additions ~~Red~~ and ~~strikeout~~ represents deletions – Marked up changes.  
**Green** shaded refers to changes following GMI consultation.

### Retail Market Procedures (WA) proposed amendments.

Commented [ND1]: For IN001/24W

16. ~~Identification of sub-networks, gas zones and gate points~~ Chapter 9 (Procedure change process) does not apply to amending and updating Appendices

(1) → An amendment to:

(a) → Appendix 1; and

{Note: The process for amending Appendix 1 is set out in clause 15.}

(b) → Appendix 2 (excluding sub-appendix 2.3, ~~“Estimation of Data for Basic Meters”~~); and

(c) → Appendix 7; and

(d) → Appendix 8; and

is not a procedure change **under and** Chapter 9 does not apply to the amendment.

(2) → For the avoidance of doubt, sub-appendix 2.3, ~~“Estimation of Data for Basic Meters”~~, is subject to Chapter 9.



## Part 8.6 – Exiting the market

### 377B. Exiting the market

(1) → In this clause 377B:

(a) → “**active in the market**”:

(i) → for a *user* for a *sub-network*— means that a *user* is the *current user* for one or more *delivery points* in the *sub-network*; and

(ii) → for a *shipper*— means that the *shipper* is listed in the *shipper register*; and

(iii) → for a *swing service provider*— means that the *swing service provider* is a party to a *SSPUD*.

(b) → “**exit the market**” means cease compliance with these *procedures*.

(2) → A *user* may not exit the market in respect of a *sub-network*:

(a) → while it is *active in the market* in the *sub-network*; and

(b) → until the earlier of:

(i) → the day that is 425 + X + 3 days after the *user* ceases to be *active in the market* in the *sub-network*, where “X” has the value given to it in clause 243(4); and

[Note: the time periods in clause 377B\(2\)\(b\)\(i\) are to allow time for all URAA and SRQ to be allocated and repaid.](#)

(ii) → the day that the *user* demonstrates to AEMO’s satisfaction that the *user* has an agreement with another person to fulfil the *user’s* obligations under Chapter 5 in respect of any future URAA or SRQ calculated for the *user* for the *sub-network*.

Commented [ND2]: For IN002/22W

The following extracts are examples of reintroduction of numbering in Appendix 2

Commented [ND3]: For IN001/24W

## Appendix 2 – Estimation and Verification Methodology

### Sub-appendix 2.1 – ATCO Gas Australia's Estimation and Verification Methodology for Basic and Interval Meters

#### 2.3.12.1.1 → Verification methodology for Basic Meters

There are two steps in the ATCO Gas Australia basic meter validation; Validation of the meter reader's data input and a trend check against historical consumption:

##### 2.1.1.1 → Validation of the meter readers data input

The Meter readers Handheld Unit (MHU) is loaded with upper and lower limits for the index reading. These limits are calculated from the previous index reading and the estimated consumption for the time period since that last meter reading. The estimated consumption is determined using the same algorithms as those used for estimating consumption in case a meter reading cannot be obtained.

The Hi-/Lo-limits allow for gas usage since the last reading ranging from 50% to 175% of estimated usage. If readings exceed this range the meter reader is required to acknowledge the error alert and re-enter the meter index reading. Only if both readings are the same is the meter reader able to store the reading.

##### 2.1.1.2 → Trend check Against Historical data

#### 2.1.2 → Verification methodology for Interval Meters

ATCO Gas Australia uses three types of verification checks:

#### 2.1.3 → Estimation of Data for Basic Meters

##### 2.1.3.1 → Type 1 Estimation Methodology ("Same Time Last Year")

ATCO Gas Australia uses this estimation methodology where the distribution supply point in respect of which the estimated value is to be calculated has at least 12 months consumption history. Where consumption is to be estimated the process is as follows:

#### 2.1.4 → Estimation of Data for Interval Meters

##### 2.1.4.1 → Dual Device Sites

When there is no validated primary data then an estimate will be based on using a copy of validated secondary data for the same period. If there is no validated secondary data available then an estimate will be made using the "same time last week" approach.

2.1.5 → Anticipated Annual Consumption¶

Anticipated annual consumption is determined in accordance with the following table by having regard to the size of the meter installed at the delivery point:¶

Meter Size¶	Anticipated Annual Consumption¶
- → For an AL6 meter:¶	100 MJ/d¶
- → For an AL12 meter:¶	550 MJ/d¶
- → Other Basic Meters:¶	Based on the nominal annual usage for that particular consumer¶

[Sub-appendix 2.2](#) -- There is no [Sub-appendix 2.2](#)¶

[Sub-appendix 2.4](#) [Sub-appendix 2.3](#) -- AEMO's Estimation Methodology for Gate Point Data, Net System Load and Interval Meters¶

Estimation of Data for Interval Meters¶

In relation to estimates for a time interval of the 'Substitution Day' for net system load and interval meters, AEMO is to create an estimate of the data using the *like day*.

## Appendix 4– Auditor’s deed of **undertaking**

Commented [ND4]: For IN009/20W

9. The Covenantor agrees to provide a Report to the Covenantee within **23** months after the end of the year to which the Audit relates, which contains the information and content as set out in clause ~~359~~**358** of the Retail Market *Procedures*.



## FRC B2B System Interface Definitions

Commented [ND5]: For IN002/23W

### Transaction Data Elements

<b>Transaction:</b>	ServiceOrderRequest	
<b>Received From:</b>	User	
<b>Sent To:</b>	Network Operator	
Data Element	Vic/SA Mandatory / Optional / Not Required	Usage
LoadDetails/PerAnnum	O	<p>In SA, required where CustomerCharacterisation is a business customer (eg "Metropolitan Business" "Non Metropolitan Business") (and optional where CustomerCharacterisation is a residential customer):</p> <p>Service Connection Request (Job Enquiry Code = "SCR")</p> <p>Basic Meter Fix (Job Enquiry Code = "MFX")</p> <p>Optional for:</p> <p>Basic Meter Change (Job Enquiry Code = "MCH")</p> <p>Service Upgrade (Job Enquiry Code = "USR")</p> <p>Meter Size Upgrade (Job Enquiry Code = "UMS")</p> <p>Downgrade Meter (Job Enquiry Code = "DMS")</p> <p>In WA required for Job Enquiry Codes "CLTSCR", "ECO", "CLT", "UMS".</p> <p>In WA Optional for "RML", "MFX", "SGFTCR" "MTN" and "RSD".</p> <p>Otherwise Not Required in SA or WA.</p> <p>For compliance with the schema, if a PlumberLicenceNumber is provided, then LoadDetails/PerHour must be populated. For new installations, the LoadDetails/PerHour shall reflect the actual requirement. For re-instatement of service after a period greater than 730 days, the LoadDetails/PerHour shall be populated with '0'.</p>

## B2B Service Order Specifications (WA Only) – Part 1

Service Order Request Elements - Western Australia		Meter & Service Connection Request Cluster Development	Upgrade Meter and or Service Request	Apply Meter Lock Regulator Removal Request Disconnect Service in Street	Remove Meter Lock Regulator Reinstall Request	Permanent Service Disconnection Request	Meter Retake and Test	Disatisfied Customer	Other
<b>Data Elements</b>	<b>General Usage Notes</b>	SCR CLT ECO	UMS	AML* MRM* DSD* TCI*	RML MTN RSD TCR	SDR	MRT	DFC	OTH
SORDSpecialComments/CommentLine	Required for DFC to provide detail of complaint (ore reference to email, etc.), optional for all other SO, field may be populated at the CSR discretion	O	O	O	O	O	O	R	R
CustomerCharacterisation	Not used in WA	NR	NR	NR	NR	NR	NR	NR	NR
LoadDetails/PerHour	This value must be populated for JobEnquiryCode SCR, ECO, CLT and UMS. The value used must be the anticipated maximum hourly load in MJ. For compliance with the schema, if a PlumberLicenceNumber is provided, then LoadDetails/PerHour must be populated. For new installations, the LoadDetails/PerHour shall reflect the actual requirement. for re-instatement of service after a period greater than 730 days, the LoadDetails/PerHour shall be populated with '0'.	R	R	NR	O	NR	NR	NR	NR
LoadDetails/PerAnnum				NR	NR	NR	NR	NR	NR
MeterInletPressure	This value must be populated for JobEnquiryCode SCR, ECO, CLT and UMS. The value used must be the required meter inlet pressure which will be defaulted to 2.75 kPa or (1.25 kPa in low pressure areas).	R	R	NR	NR	NR	NR	NR	NR

## Attachment B – IIR RESPONSE TEMPLATE

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

- Section 1 seeks general feedback on AEMO's examination of the proposal in sections 1–9 of this IIR.
- Section 2 seeks feedback on the proposed changes listed in Attachment A.

Anyone wishing to make a submission to this IIR consultation are to use this response template. Submissions close **COB 3 June 2024** and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

## Attachment C – Proposed Procedure Change (PPC) collated responses for Package 6 WA Minor changes.

### Section 1 - General Comments on the Proposed Procedure Change

Sections 1 to 9 of the PPC sets out details of the proposal.

Does your organisation support AEMO's assessment 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 why you do not support AEMO's assessment.

IN#	Ref	Respondent	Participant Response	AEMO Response
IN009/20W	1	AGL	AGL supports this change	AEMO notes AGL's support for the proposed change.
	2	Alinta	Alinta Energy agrees with the proposed amendments and has no further comments.	AEMO notes Alinta's support for the proposed change.
	3	ATCO	ATCO supports AEMO's assessment of proposal IN009/20W	AEMO notes ATCO's support for the proposed change.
	4	Origin Energy	Origin supports AEMO's assessment of the proposal	AEMO notes Origin's support for the proposed change.
	5	Synergy	Synergy supports the proposed change.	AEMO notes Synergy's support for the proposed change.



IN#	Ref	Respondent	Participant Response	AEMO Response
IN002/22W	6	AGL	AGL supports this change	AEMO notes AGL's support for the proposed change.
	7	Alinta	Alinta Energy agrees with the proposed amendments and has no further comments.	AEMO notes Alinta's support for the proposed change.
	8	ATCO	ATCO supports AEMO's assessment of proposal IN002/22W	AEMO notes ATCO's support for the proposed change.
	9	Origin Energy	Origin supports AEMO's assessment of the proposal	AEMO notes Origin's support for the proposed change.
	10	Synergy	Synergy supports the proposed change.	AEMO notes Synergy's support for the proposed change.
IN001/24W	11	AGL	AGL supports this change	AEMO notes AGL's support for the proposed change.
	12	Alinta	Alinta Energy agrees with the proposed amendments and has no further comments, noting that AEMO has accepted further minor amendments to clause 16(1) and Appendix 2 as proposed by Alinta Energy in its response to the GMI.	AEMO notes Alinta's support for the proposed change.
	13	ATCO	ATCO supports AEMO's assessment of proposal IN001/24W	AEMO notes ATCO's support for the proposed change.

IN#	Ref	Respondent	Participant Response	AEMO Response
	14	Origin Energy	Origin supports AEMO's assessment of the proposal	AEMO notes Origin's support for the proposed change.
	15	Synergy	Synergy supports the proposed change.	AEMO notes Synergy's support for the proposed change.
IN002/23W	16	AGL	AGL supports this change	AEMO notes AGL's support for the proposed change.
	17	Alinta	Alinta Energy agrees with the proposed amendments and has no further comments.	AEMO notes Alinta's support for the proposed change.
	18	ATCO	ATCO supports AEMO's assessment of proposal IN002/23W	AEMO notes ATCO's support for the proposed change.
	19	Origin Energy	Origin supports AEMO's assessment of the proposal	AEMO notes Origin's support for the proposed change.
	20	Synergy	Synergy supports the proposed change.	AEMO notes Synergy's support for the proposed change.

## Section 2 - Feedback on the documentation changes in the Attachments B.

Retail Market Procedures (Western Australia)					
Ref #	Organisation	Clause #	Issue / Comment	Proposed text Red <del>strikeout</del> means delete and blue <u>underline</u> means insert	AEMO Response (AEMO only)
21	AGL		No further comment		
22	ATCO	16	ATCO agrees with the proposed changes		AEMO notes ATCO's agreement with the proposed change.
23	ATCO	377B	ATCO agrees with the proposed changes		AEMO notes ATCO's agreement with the proposed change.
24	ATCO	Appendix 2 and Appendix 4	ATCO agrees with the proposed changes		AEMO notes ATCO's agreement with the proposed change.
25	Synergy		Synergy has no further comment.		
FRC B2B System Interface Definitions					
Ref #	Organisation	Clause #	Issue / Comment	Proposed text Red <del>strikeout</del> means delete and blue <u>underline</u> means insert	AEMO Response (AEMO only)
26	AGL		No further comment		

27	ATCO	LoadDetails/PerAnnum	ATCO agrees with the proposed changes		AEMO notes ATCO's agreement with the proposed change.
28	Synergy		Synergy has no further comment.		
<b>B2B Service Order Specification (WA only) – Part 1</b>					
Ref #	Organisation	Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
29	AGL		No further comment		
30	ATCO	LoadDetails/PerAnnum	ATCO agrees with the proposed changes		AEMO notes ATCO's agreement with the proposed change.
31	Synergy		Synergy has no further comment.		