

**IMPACT & IMPLEMENTATION REPORT – SUMMARY SECTION**  
*(For AEMO to complete and administer)*

<b>Issue Number</b>	IN039/16		
Impacted Jurisdiction (s)	All		
Proponent	Nandu Datar	Company	AEMO
Affected Gas Markets(s) <ul style="list-style-type: none"> <li>▪ Retail</li> <li>▪ Wholesale</li> <li>▪ Bulletin Board</li> <li>▪ STTM</li> </ul>	Retail Gas	Consultation process (Ordinary or Expedited)	Ordinary
Industry Consultative forum(s) used	GRCF	Date Industry Consultative forum(s)consultation concluded	19 June 2017
Short Description of change(s)	Harmonisation of Password Protection on Customer and Site Details file T900		
Procedure(s) or Documentation impacted	Refer to documents listed in section 2 of this Impact and Implementation Report (IIR).		
Summary of the change(s)	Modify IT systems to remove the application of file password protection and to apply a consistent approach to file compression. See section 1 of this IIR for further detail on these changes.		
I&IR Prepared By	Nandu Datar	Approved By	Ruth Guest
Date I&IR published	30 June 2017	Date Consultation under 135EE or 135EF concludes	28 July 2017
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## IMPACT & IMPLEMENTATION REPORT – DETAILED REPORT SECTION

### CRITICAL EXAMINATION OF PROPOSAL

1. Description of change(s) and reasons for change(s)

The Retail Market Procedures (RMP) place an obligation on Retailers to provide AEMO with customer and site information each month. The technical protocols (TP) that underpin the RMP describe the fields, format (including protection formats) and method of delivery for the customer and site details file (T900).

Currently the delivery method is via AEMO’s Market Information Bulletin Board (MIBB) for all jurisdictions but the application of the protection format is not consistent across jurisdictions.

The table below shows the current and proposed protection format for each jurisdiction:

JURISDICTION	CURRENT PROTECTION	PROPOSED PROTECTION
Victoria (VIC)	Zipped and Password protected	Zipped only
Queensland (QLD)	Zipped and Password protected	Zipped only
New South Wales (NSW/ACT)	Zipped and no password	Zipped only
South Australia (SA)	Not Zipped and no password	Zipped only

Having different protection formats creates an overhead for retailers as it requires them to perform different processes prior to sending the T900 file to AEMO for each jurisdiction. The AEMO check if a password protection format is applied is an additional overhead.

AEMO has weighed up various “pros” and “cons” on the best way to resolve the above inconsistency and have concluded that password protection should be removed and file compression formatting retained. This is the approach adopted by NSW/ACT. This position was put to Participants during the Proposed Procedure Change (PPC) consultation. None of the Participants have raised any objection to the above approach.

The amendments described in this Impact & Implementation Report (IIR) are as follows:

- For Retailer,
  - Modify IT system so that the application of a password protected T900 file for Victoria and Queensland is removed.
  - Modify IT system so that the T900 file for South Australia is compressed before submission.

	<ul style="list-style-type: none"> <li>• For AEMO, <ul style="list-style-type: none"> <li>○ Modify IT system to remove the test to validate password protection on a T900 file for Victoria and Queensland.</li> <li>○ Modify IT system by the service provider to only accept a compressed T900 file for South Australia.</li> <li>○ There is no IT system change for NSW/ACT participant. There is only minor documentation changes for NSW/ACT.</li> <li>○ Amend the TP documentation that places the obligation on Retailers and AEMO IT systems.</li> </ul> </li> </ul>
<p>2. Reference documentation</p> <ul style="list-style-type: none"> <li>▪ Procedure Reference</li> <li>▪ GIP/Specification Pack Reference</li> <li>▪ Other Reference</li> </ul>	<p>Gas Interface Protocol (Victoria) v20.0 and Gas Interface Protocol (Qld) v17.0, including</p> <ul style="list-style-type: none"> <li>• Participant Build Pack 1 – CSV Data Format Specifications v3.3</li> <li>• Participant Build Pack 1 – Process Flow Diagrams v3.4</li> </ul> <p>Gas Interface Protocol (NSW/ACT) v 1.0, including</p> <ul style="list-style-type: none"> <li>• NSW-ACT PBP5 – Process Flow Diagrams v1.0</li> </ul> <p>Specification Pack Usage Guide v 6.4, including</p> <ul style="list-style-type: none"> <li>• FRC B2B System Interface Definitions v4.1</li> </ul>
<p>3. The high level details of the change(s) to the existing Procedures</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>▪ A comparison of the existing operation of the Procedures to the proposed change to the operation of the Procedures</li> <li>▪ A marked up version of the Procedure change (see Attachment A)</li> </ul>	<p>In terms of the TP the following is proposed:</p> <ul style="list-style-type: none"> <li>• Amend Participant Build Pack 1 – CSV Data Format Specifications to include requirement of compressing the T900 CSV file before sending to AEMO. <i>See attachment A for further details.</i></li> <li>• Amend Participant Build Pack 1 – Process Flow Diagrams to include requirement of compressed CSV format for monthly customer data and remove the requirement of encrypting and password protecting. <i>See attachment B for further details.</i></li> <li>• Amend FRC B2B System Interface Definitions to include requirement of compressing the T900 CSV file before sending to AEMO. <i>See Attachment C for further details.</i></li> <li>• Amend Participant Build Pack 5 – Process Flow Diagrams to include requirement of compressed CSV format for monthly customer data (this is done to make the process flow in PBP5 consistent with PBP1). <i>See attachment D for further details.</i></li> </ul>
<p>4. Explanation regarding the order of magnitude of the change</p> <p>(eg: material, non-material or non-substantial)</p>	<p>An explanation regarding the order of magnitude of the change formed part of the Proposed Procedure Change (PPC) proposal. At the time of preparing the PPC it was AEMO’s view that the indicative cost to retailers to implement this change is not significant. The PPC was issued to the Gas Retail Consultative Forum (GRCF) with an invitation to provide feedback on the order of magnitude. None of the feedback received opposed AEMO view that the changes are not significant. AEMO therefore has</p>

	concluded that this is a non-substantial change.
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<b>ASSESSMENT OF LIKELY EFFECT OF PROPOSAL</b>	
<p>5. Overall Industry Cost / benefit (tangible / intangible / risk) analysis and/or cost estimates</p>	<p>As noted in section 4 of this IIR, at the time of preparing the PPC it was AEMO’s view that the indicative cost to retailers to implement this change is not significant. AEMO and its IT service provider’s costs are expected to be around \$20,000.</p> <p>The implementation of this initiative is expected to provide the following benefits.</p> <ul style="list-style-type: none"> <li>• Harmonised process across all jurisdictions reducing the overhead for retailers.</li> <li>• Reduction in performing additional steps linked to inclusion of password protection.</li> </ul> <p>Section 9 of this IIR describes the consultation steps undertaken by AEMO prior to issuing this IIR. During the PPC consultation period, no participant raised any concerns in relation to cost impacts to industry or the benefits identified. AEMO has therefore concluded that there are no significant costs to implement the proposed changes and that the above benefits should be realised over time.</p>
<p>6. The likely implementation effect of the change(s) on stakeholders  (e.g. Industry or end-users)</p>	<p>Retailers can use the harmonised process to submit T900 files in all jurisdictions.</p> <p>Reduction in additional and non-necessary steps performed by AEMO.</p> <p>Some retailers indicated that their resources are committed to the Power of Choice program and hence will not be in a position to implement changes related to this work before September 2018. AEMO’s proposed implementation timeframe is February 2018. A transition period is proposed following implementation of changes by AEMO.</p> <ul style="list-style-type: none"> <li>• AEMO to implement the agreed harmonisation changes in February 2018 following which the transition period for current retailers will commence.</li> <li>• A new retailer joining the market will be required to deliver the T900 file in compressed CSV format with no password protection.</li> <li>• AEMO to implement manual or system processes to manage inconsistencies in password protection during the transition period.</li> <li>• The transition period to end September 2018.</li> </ul>

<p>7. Testing requirements</p>	<p>The following is AEMO's proposed testing approach:</p> <p>Retailers can provide AEMO the following for Vic, Qld and SA:</p> <ul style="list-style-type: none"> <li>• A compressed T900 files without password protection to test receipt of a file ;</li> <li>• A compressed T900 files with password protection to test that the file is rejected;</li> <li>• An uncompressed T900 files without password protection to test that the file is rejected;</li> <li>• An uncompressed T900 files with password protection to test that the file is rejected</li> </ul>
<p>8. AEMO's preliminary assessment of the proposal's compliance with section 135EB:</p> <ul style="list-style-type: none"> <li>- consistency with NGL and NGR,</li> <li>- regard to national gas objective</li> <li>- regard to any applicable access arrangements</li> </ul>	<p><u>Consistency with NGL and NGR:</u></p> <p>AEMO's view is that the proposed RMP changes are consistent with the NGL and cover matters that the RMP may deal with under Section 135EA(1) of the NGR.</p> <p><u>National Gas Objective</u></p> <p><i>"Promote efficient investment in, and efficient operation and use of, natural gas services for the long term interests of consumers of natural gas with respect to price, quality, safety, reliability and security of supply of natural gas."</i></p> <p>It is AEMO's view that the proposed changes described in this IIR will assist the efficient operation of the retail gas market, and are in the long-term interests of consumers as it promotes retail competition.</p> <p><u>Applicable Access Arrangements</u></p> <p>AEMO's view is that the proposed changes in this IIR are not in conflict with existing Access Arrangements. The Distributor did not raise concerns with the proposed amendments in relation to their Access Arrangement.</p>
<p>9. Consultation Forum Outcomes</p> <p>(e.g. the conclusions made on the change(s) whether there was unanimous approval, any dissenting views)</p>	<p>On 26 May 2017 AEMO published on its website a Proposed Procedure Change (PPC) that recommended minor system changes and documentation changes as described in attachment A, B and C. Registered participants and interested stakeholders were invited to make submissions which closed on 19 June 2017. AEMO received submissions from AGL, Jemena, Momentum, Origin Energy, Energy Australia and Red/Lumo supporting the proposal. Further changes proposed by AGL and Red/Lumo have been incorporated, these are highlighted in the attachments below.</p> <p>Energy Australia (EA) requested an extended transitional period lasting until September 2019 which is inconsistent the GRCF agreed position of a September 2018. AEMO is of the view that a further 12 month transition is not warranted considering the only change EA needs to make is compressing of the T900 file for South Australia.</p>

<b>RECOMMENDATION(S)</b>	
10. Should the proposed Procedures be made, (with or without amendments)?	AEMO recommends that the changes be made as proposed in attachment A, B, C and D with amendments as per the consultation forum outcome (see item 9 above).
11. If applicable, a proposed effective date for the proposed change(s) to take effect and justification for that timeline.	<p>Subject to all necessary approvals AEMO is targeting to implement this change in February 2018.</p> <p>To achieve this AEMO proposes the following timeline:</p> <ul style="list-style-type: none"> <li>• Issue IIR on 30 June 2017</li> <li>• Submissions on IIR close 28 July 2017</li> <li>• AEMO decision 15 August 2017</li> <li>• Effective date end of September 2017 with a transition period end date of 31 August 2018.</li> </ul>

## ATTACHMENT A

### Proposed changes: PARTICIPANT BUILD PACK 1 – CSV DATA FORMAT SPECIFICATIONS

~~Red strikeout~~ means delete and  
blue underline means insert

#### 6.14 Customer and Site Details (Monthly – Non Host update) (T900)

In order to manage the 'transfer' and customer set up following a RoLR event, all non-Declared Host Retailers are to provide to AEMO, on a monthly basis, a list of MIRNS and associated details for which they are the FRO.

The Customer and Site Details (Monthly) listing is to be refreshed after the end of the calendar month by the non-Declared Host Retailers and the non-Declared Host Retailers must FTP the refreshed files to AEMO.

(A) For a Retailer that registers after September 2017 the provisions described in (B) ~~does~~ do not apply. Instead the file must be provided to AEMO in a compressed CSV format (refer to chapter 4 Compression Format in this document) and without any password protection.

(B) File Format Transitional Requirement

For a Retailer that registered before <effective date of new procedures> the file may be provided to AEMO in a compressed CSV format (refer to chapter 4 Compression Format in this document) and with password protection until 1 September 2018. After 1 September 2018, the file must be provided to AEMO in a compressed CSV format (refer to chapter 4 Compression Format in this document) and without any password protection. The requirement to provide the file in the format described in (A) above does not apply to retailers registered before September 2017 until 1 September 2018. For the avoidance of doubt all retailers must provide the file to AEMO in a compressed CSV format after this date (refer to chapter 4 Compression Format in this document).

AEMO will provide a secure location for each file that enables only all non-Declared Host Retailers to directly place the file in a secure location to which the relevant all non-Declared Host Retailer has Market Information Bulletin Board (MIBB) access privileges that require a username and password.

The following file naming convention is to be used:

VICGAS\_CUSTOMERSITEDETAILSMONTHLY\_OriginatorID\_RecipientID\_CCYYMMDDHH  
mmSS

Note: Reference to "all non-Declared Host Retailer" refer to the Hub participant ID.

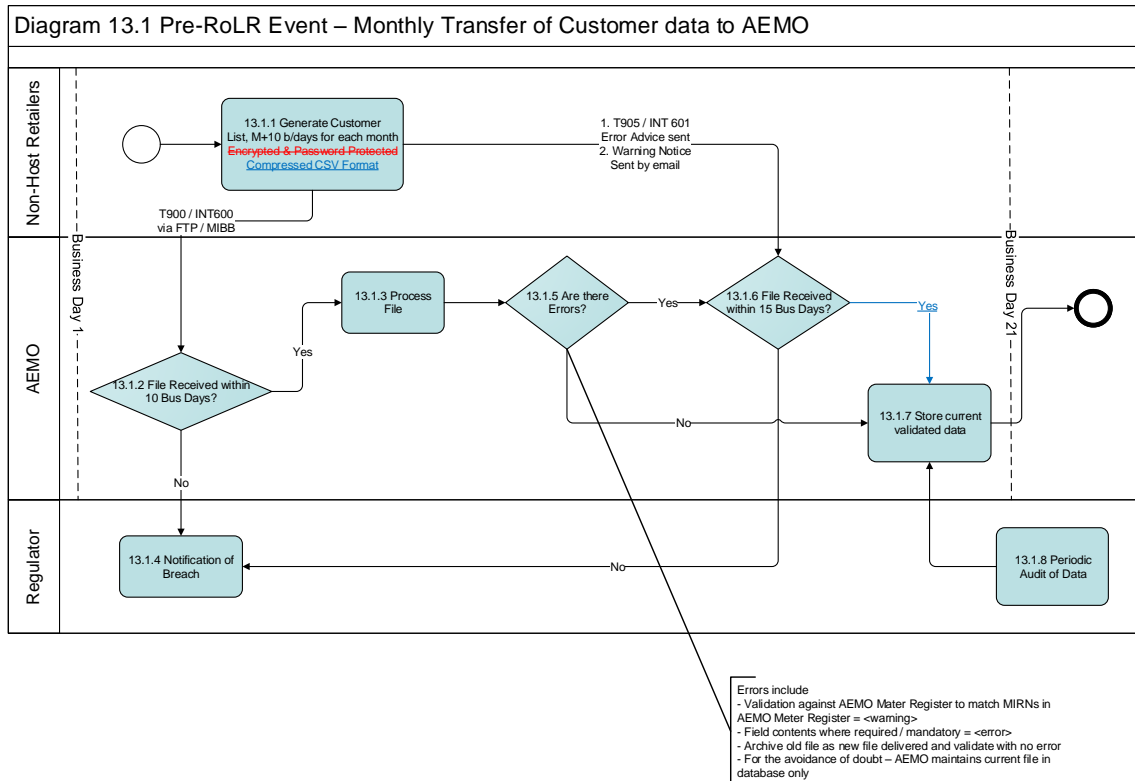
## ATTACHMENT B

### Proposed changes: PARTICIPANT BUILD PACK 1 – PROCESS FLOW DIAGRAMS

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blue underline means insert

### 2.1 DIAGRAM 13.1 – PRE-ROLR EVENT – MONTHLY TRANSFER OF CUSTOMER DATA TO AEMO





## ATTACHMENT C

### Proposed changes: FRC B2B SYSTEM INTERFACE DEFINITIONS

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blue underline means insert

## Appendix G RoLR Process (SA Only)

### 1. Customer and Site Details (Monthly update) (T900)

In order to manage the 'transfer' and customer set up following a RoLR event, all Users are to provide to AEMO, on a monthly basis, a list of MIRNS and associated details for which they are the current user.

The Customer and Site Details (Monthly) listing is to be refreshed after the end of the calendar month by Users. Users must FTP the refreshed files to AEMO. AEMO will provide a secure location for each file that enables Users to directly place the file in a secure location to which the relevant all Users has Market Information Bulletin Board (MIBB) access privileges that require a username and password.

~~This file is to be provided in CSV format~~

(A) For a Retailer that registers after September 2017 the provisions described in (B) ~~does~~ do not apply. Instead the file must be provided to AEMO in a compressed CSV format (refer to chapter 4 Compression Format in this document).

(B) File Format Transitional Requirement

For a Retailer that registered before <effective date of new procedures> the file may be provided to AEMO in a compressed CSV format (refer to chapter 4 Compression Format in this document) and with password protection until 1 September 2018. After 1 September 2018, the file must be provided to AEMO in a compressed CSV format (refer to chapter 4 Compression Format in this document) and without any password protection. The requirement to provide the file in the format described in (A) above does not apply to retailers registered before September 2017 until 1 September 2018. For the avoidance of doubt all retailers must provide the file to AEMO in a compressed CSV format after this date (refer to chapter 4 Compression Format in this document).

The following file naming convention is to be used:

SAGAS\_CUSTOMERSITEDTAILSMONTHLY\_OriginatorID\_RecipientID\_CCYYMMDDHHm  
mSS

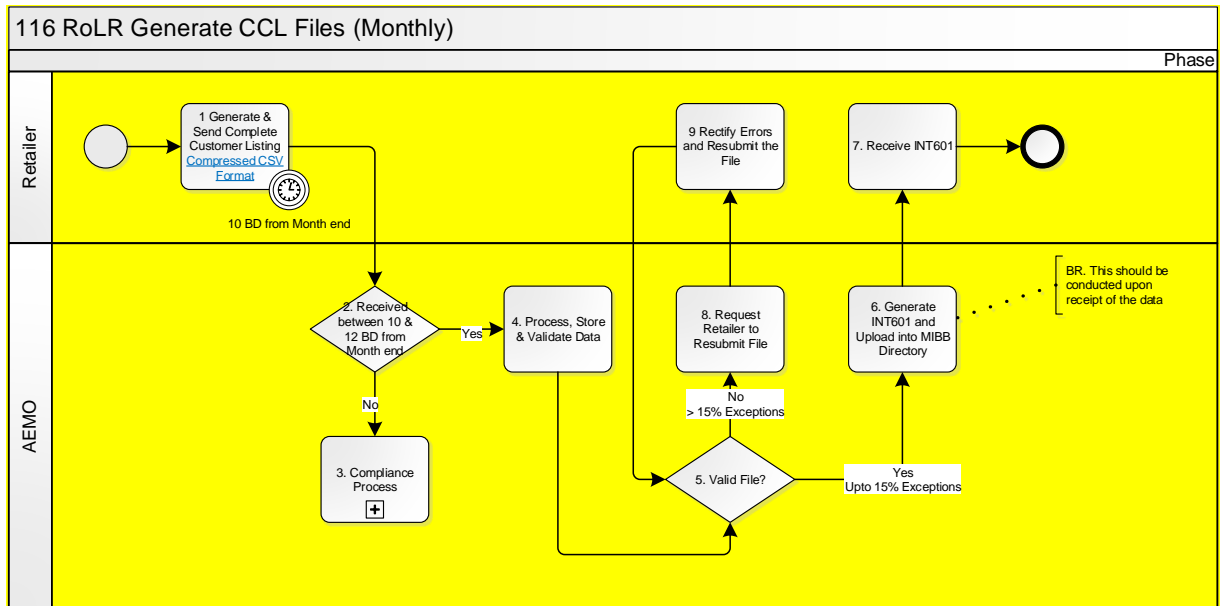
## ATTACHMENT D

### Proposed changes: NSW-ACT PBP5 – PROCESS FLOW DIAGRAMS

~~Red~~ ~~strikeout~~ means delete and

blue underline means insert

#### 10.1 Diagram 116 – RoLR Generate CCL Files (Monthly)



## ATTACHMENT E – Consolidated List of Stakeholder Feedback to Proposed Procedure Change

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT <del>RED STRIKEOUT</del> MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
AGL	General Comment	AGL supports the concept of harmonising processes across the various gas markets wherever possible as this is a more efficient outcome for industry and customers.		AEMO acknowledges AGL's support of the proposed changes.
AGL	Participant Build Pack 1 – CSV Data Format Specification  Clause 6.14	Grammar	Change <b>does to do</b> ... the provisions described in (B) <b>does</b> not apply.	AEMO agrees that AGL's feedback adds further clarity to the text and has amended the clause accordingly.
AGL	Participant Build Pack 1 – CSV Data Format Specification and  FRC B2B System Interface Definitions	Clause B – change Structure so that the subsequent clause can be deleted after 1 Sep 2018.  Suggested drafting should achieve the proposed goals. The transitional requirement can be deleted at the subsequent revision of the procedures.	<u>Change to:</u> <a href="#">Customer and Site Details File Format</a>  The file must be provided to AEMO in a compressed CSV format (refer to chapter 4 Compression Format in this document) and without any password protection.	AEMO agrees that AGL's feedback adds further clarity to the text and has amended the clause accordingly.

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT <del>RED STRIKEOUT</del> MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
			<p><b>File Format Transitional Requirement</b></p> <p>The requirement to provide the file in the format described above does not apply to retailers registered prior to &lt;procedure date&gt; until 1 Sep 2018.</p> <p>For the avoidance of doubt all retailers must provide the file in this format after this date.</p>	
Jemena	General Comment	This is not applicable to Jemena and AAD as the distributors so we have no feedback to provide on this PPC.		AEMO acknowledges Jemena's response.
Momentum	General Comment	Yes, Momentum Energy supports the proposed procedure change and AEMO's assessment of likely		AEMO acknowledges Momentum's support of the proposed changes.

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT <del>RED STRIKEOUT</del> MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
		<p>effect of proposal.</p> <p>Momentum currently does not zip the T900 file or password protection for Victoria, NSW and South Australia. The business process for uploading the file on a monthly basis is manual and there will be no IT System modification consequently.</p>		
Origin Energy	General Comment	Yes, agree with proposal		AEMO acknowledges Origin Energy's support of the proposed changes.
Energy Australia	General Comment	<p>EnergyAustralia supports the proposal to harmonise state specific T900 files, acknowledging that this action will benefit the industry moving forward.</p> <p>Whilst EnergyAustralia supports this proposal, we also ask that the transition period is extended by 6 – 12 months to cater for IT related Power of Choice impacts.</p>		<p>AEMO acknowledges Energy Australia's support of the proposed changes.</p> <p>AEMO also requests Energy Australia to reconsider their position.</p>

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT <del>RED STRIKEOUT</del> MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
		Our change calendar for the remainder of 2017 is locked for Power of Choice, and 2018 is locked for items which have been on hold due to Power of Choice, we are unsure whether this change will be scheduled prior to September 2018.		
Energy Australia	Proposed Procedure Change Section 7	EA requests the transition period increase by 6 – 12 months. This proposal will require an IT change, and our change calendar for the remainder of 2017 is locked for Power of Choice, resulting in a number of other IT requests being put on hold till 2018, we can't confirm whether this change will be scheduled prior to September 2018.	<p><del>The transition period to end September 2018.</del></p> <ul style="list-style-type: none"> <li><u>The transition period to end September 2019.</u></li> </ul>	During the PPC stage all participants agreed to the transition period ending by September 2018. AEMO is of the view that a further 12 month transition is not warranted considering the only change EA needs to make is compressing of the T900 file for South Australia.
Red/Lumo	General Comment	Red & Lumo support AEMO's examination of the proposal detail in sections 1 to 10 of the PPC. However, we have provided some additonal comments as part of the PPC Appendix items that relate to further amendments to be		AEMO acknowledges Red/Lumo's support of the proposed changes.

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT <del>RED STRIKEOUT</del> MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
		considered across other jurisdiction's related documents. Red & Lumo agree with AEMO's assessment of the likely effect of implementation of the proposal and we strongly support a transition period for existing market retailers to transition format and delivery of T900 files until date 1 <sup>st</sup> September 2018.		
Red/Lumo	NSW-ACT PBP5 – Process Flow Diagrams - Clause 10.1	Include similar changes made to VIC BP1 Process flow diagram that states compressed CSV Format	1 Generate & Send Complete Customer Listing <u>Compressed CSV Format</u>	AEMO agrees that Red/Lumo's feedback adds further clarity to the text and has amended the process diagram accordingly.
Red/Lumo	Participant build pack 4 – QLD (4.6)	Harmonisation of RMP should be considered, can we not include and amend other jurisdictions specific Build packs to also include similar process flows adopted in NSW (10.1 BP5) & VIC (2.1 BP1)		AEMO acknowledges Red/Lumo's feedback. The process flow for QLD is covered by VIC PBP1 and for South Australia AEMO a new issue (IN008/17) has been added to the issue register to include RoLR process flows in the technical protocol documentation.