

PROPOSED PROCEDURE CHANGE (PPC)

Summary Section

Issue Number	IN012/17		
Impacted Jurisdiction(s)	South Australia (SA)		
Proponent	Anthony Boin	Company	APA Group
Proponent e-mail	retailgasmarkets@apa.com.au	Proponent phone #	(03) 8533 2142
Affected Gas Market(s)	• Retail	Date proposal sent to AEMO	Tuesday, 12 September 2017
Short Issue Title	Remove requirement to provide a meter read with a MIRN Status Update for Deregistered transactions in SA (Industry Harmonisation)		
Other key contact information	grcf@aemo.com.au		

VERSION #	PRESENTED TO	DATE
1.0	GRCF	15 April 2019



PROPOSED PROCEDURE CHANGE (PPC)

1. DESCRIPTION OF CHANGES AND REASONS FOR CHANGES

Original Proposal Submitted by APA

Following the permanent removal of a Delivery Point (service pipe/upstand), AEMO's South Australian (SA) Gas Retail Market System (SA GRMS) requires a meter read to be provided in conjunction when the Network Operator sends a GasMeterNotification/MIRNStatusUpdate (Deregistered) transaction for that MIRN.

APA has proposed a change whereby provision of the meter read would no longer be required thus harmonising SA practices with those of NSW, ACT, Victoria and Queensland.

This PPC has been raised to address the following issues with the existing process and presents further opportunities for harmonisation.

Issue 1: Gas meter not present on upstand on day Delivery Point dismantled

If the removal of a gas meter occurred prior to the day of the dismantling of a Delivery Point, taking a meter read is not possible. It is common for the removal of a meter to have occurred weeks, months or years prior to the dismantling of the Delivery Point. As the SA procedures state a meter reading is required with a GasMeterNotification/MIRNStatusUpdate transaction, the Network Operator would need to retrieve the meter reading from the previous meter remove transaction (GasMeterNotification/MIRNStatusUpdate = "*Decommissioned*"). Note that AEMO and the relevant Retailer would have previously received the meter reading when the meter was decommissioned.

Issue 2: Manually resend meter reads

Div. 4.4.3 Clause 158 of the SA Retail Market Procedures (RMP) requires that prior to the dismantling of the delivery point, the meter read corresponding to the meter removal that resulted in a MIRN status update to *Decommissioned*, is provided to AEMO (GRMS).

Where the gas meter is not physically on site on the day of the dismantling of the Delivery Point, the previously provided read (as referred above) is resent manually by the Network Operator to AEMO for the date when the Delivery Point is dismantled (MIRN status updated from *Decommissioned* to *Deregistered*).

This manual process is using resources from both the Network Operator and AEMO. Data analysis indicates that approximately 1700 reads (annually) are resent manually in the SA market.

Issue 3: RMP inconsistency between jurisdictions

The industry RMPs are inconsistent between jurisdictions. The NSW/ACT, VIC and QLD jurisdictions do not require a meter read for GasMeterNotification/MIRNStatusUpdate (Deregistered) transactions whereas a meter read is required in SA. Consistency across all jurisdictions is desirable and provides a harmonisation opportunity.

Issue 4: Inconsistent AEMO acknowledgement notifications between NSW/ACT/VIC/QLD and SA

In SA, AEMO sends the Network Operator a GasMeterNotification/MIRNStatusUpdate transaction confirming the MIRN Status as *Deregistered* and a transaction acknowledgement indicating the transaction was *Accepted*. However, where a meter read could not be provided with the MIRN Status Update transaction, a notification is sent to the Network Operator advising that the *Deregistered* MIRN status update was cancelled in AEMO's system.

In NSW/ACT, VIC and QLD operations using the FRC HUB, a validation check for the existence of a meter read is not performed and the transaction acknowledgement provided by AEMO will either be an 'Accept' (meaning the MIRN status was successfully loaded) or 'Reject' (including the reason for rejection), rather



than accepting all transactions before subsequently forwarding a separate cancellation notification email. Consistency between jurisdictions would be desirable.

Following permanent removal of the meter and service pipe/upstand, the MIRN Status in APA/AGN system is updated to 'Deregistered'. The APA/AGN team responsible for service orders has identified that as the Deregistered GasMeterNotification/MIRNStatusUpdate transactions are being cancelled by AEMO where no read has been simultaneously provided, the MIRN statuses are out of sync between APA/AGNL and the Retailers/AEMO.

Workshop Outcome

A workshop attended by APA and AEMO internal stakeholders including AEMO's IT provider, CGI was held on 21 February 2019 to discuss the issues. The agreed outcome of the workshop was for AEMO to amend the proposal to reflect the specific changes required in Retail Market Procedures (RMP) SA and the relevant artefacts of the Specification Pack and resubmit to APA and AEMO internal stakeholders for review.

It was agreed unanimously that following review of the proposal by AEMO and APA, AEMO will proceed with this Proposed Procedure Change (PPC) consultation with GRCF participants.

Harmonisation of Western Australia (WA) Procedures

There are similarities between SA and WA procedures with both jurisdictions sharing the artefacts of the Specification Pack. AEMO investigated harmonising WA procedures with the proposed changes to SA procedures. Following discussions with the WA Network Operator ATCO, it was apparent that the business process of deregistering MIRNs in WA differs to that in SA. In WA the meter is only removed during the deregistration process and the subsequent deregistration transaction sent to AEMO always includes a meter read taken at that time. AEMO's help desk therefore does not receive requests for metering information for deregistering MIRNs from WA, unlike the requests from SA.

AEMO has concluded that the WA procedures cannot not be harmonised with changes proposed for SA procedures contained in this PPC.

Note:

Deregistration of a MIRN in the market marks the time when GRMS no longer estimates meter readings for that MIRN. AEMO notes that closer the alignment of the deregistration date of the MIRN, to the date that there is no longer gas drawn at the MIRN, the more accurate will be the basic meter reading estimations.

Transition Period: Following implementation of this proposal there would be a transition period for Deregistration transactions that are in flight. The Impact and Implementation Report will include details of the transition process for these transactions.

2. REFERENCE DOCUMENTATION

- Retail Market Procedures (SA) – V13.0
- SA/WA Interface Control Document – version 4.8
- FRC B2M Process Flows and Sequence Diagrams – version 3.5

3. HIGH LEVEL OVERVIEW OF THE CHANGES TO THE EXISTING PROCEDURES

Proposed amendments to the Retail Market Procedure (SA) are as follows;

- Amend clause 127(2)(e) so that a meter reading is required to be provided only when the meter is read during the permanent removal process.
- Remove clause 131 which cancels the update of MIRN status when meter data is not received.
- Amend clause 132 to remove all references to the receipt of metering data.



Proposed amendments to the SA/WA Interface Control Document are as follows;

- Amend clause 8.6.1 - Transaction Mapping to indicate the Physical Transaction '*MeterDataMissingNotification*' now applies to WA only.
- Amend clause 8.6.2 – Code Summary to indicate the Identifier 'PR-MR-ALT' now applies to WA only.
- Indicate the clause 8.6.4 – MeterDataMissingNotification Transaction now applies to WA only.

Proposed amendments to the FRC B2M Process Flows and Sequence Diagrams are as follows;

- Create a new SA version of the process flow 'PF(B2M) – R6: Permanent Removal (MIRN Deregistered) (Basic metered site)' by removing the process steps related to availability of meter read and redundant 'Notes' at the bottom of the diagram.
- Indicate that the existing process flow mentioned above now applies to WA only.

AEMO recommends amending the SA GRMS system functionality related to MIRN status update for deregistration to remove the validation check for the existence of a meter read transaction before updating the status in standing data.

See attachments A to C for further details.

4. CONSEQUENCES FOR MAKING OR NOT MAKING THE CHANGES

If this initiative is not implemented, then the Network Operator will need to continue to manually send the meter read data that was previously provided while decommissioning the MIRN. This is an unnecessary task and that effort could be used elsewhere.

- For the period January 2019 to March 2019, it has taken AEMO approximately 30 hours to manually update the status for 455 MIRNs in SA GRMS.

Ongoing manual work around by APA/AGN will be required to provide the meter read for the *Deregistration* of the MIRN in AEMO's system.

There would continue to be a risk of database misalignment of MIRN status information between the Network Operator and AEMO if exceptions are not resolved as per the details below:

- Between September 2018 and January 2019, there were approximately 820 MIRN Status Updates for *Deregistered* status that required manual intervention.
- This takes APA approximately 5 minutes to resolve each exception.
- The above equates to approximately 8 weeks per year worth of exception handling work that could be directed into other activities.

5. EXPLANATION REGARDING THE ORDER OF MAGNITUDE OF THE CHANGES

AEMO's assessment in terms of the order of magnitude is that the proposed changes are *non-substantial*.

This proposal requires minor RMP and Specification Pack changes. The proposal also requires minor system changes to remove the validation process which checks for the existence of the meter data transaction before updating the status to deregistered.

6. LIKELY BENEFITS FOR INDUSTRY AS A WHOLE

- Reduction in manual intervention required by the Network Operator to locate meter data that was previously supplied to AEMO.



- Reduction in manual intervention required by AEMO IT to update status to *Deregistered*.
- Harmonisation of gas market procedures and processes between SA, NSW, VIC and QLD jurisdictions that use the FRC Hub for B2B transactions.

7. IMPLEMENTATION IMPACTS

These changes will:

- Remove the need for the Network Operator to send a meter reading while requesting a MIRN Status update to '*Deregistered*'; and
- Reduce the manual effort from AEMO in correcting the MIRN status update to *Deregistered*.

8. TESTING REQUIREMENTS

Testing by AEMO would be required to ensure a GasMeterNotification/MIRNStatusUpdate transaction is not cancelled when a Meter Data transaction was not provided.

Testing by the Network Operator will be required to ensure a MIRN status can be successfully updated to *Deregistered* without providing the final meter data.

9. SUPPORTING DOCUMENTATION

Refer to Attachment A (Proposed amendments to the RMP SA)

Refer to Attachment B (Proposed amendments to SA/WA Interface Control Document)

Refer to Attachment C (Proposed amendments to FRC B2M Process Flows and Sequence Diagrams)

10. PROPOSED EFFECTIVE DATE FOR THE PROPOSED CHANGED PROCEDURES TO TAKE EFFECT

AEMO proposes the following consultation timeline:

- Issue PPC on 15 April 2019.
- Submission on PPC closes 6 May 2019.
- Issue IIR on 16 May 2019.
- Submissions on IIR close 17 June 2019.
- AEMO decision on 28 June 2019.
- Targeted Effective date 1 October 2019



ATTACHMENT A – DOCUMENTATION CHANGES (SEE SECTION 3)

Blue underline represents additions **Red** and ~~strikeout~~ represents deletions – Marked up changes

- Retail Market Procedures (South Australia)

Part 3.6– Removing Delivery Points And Deregistering MIRNs

Division 3.6.1 – Permanent Removal by network operator

125. Permanently removing delivery points

- (1) *A network operator:*
 - (a) may *permanently remove a delivery point* when required to, or if not prevented, by *law* or a contract other than these *Procedures*; and
 - (b) must (subject to *law*) *permanently remove a delivery point* if required to under this clause 125.
- (2) Subject to clause 125(3), a *user* may at any time lodge a *permanent removal request* with the *network operator*.
- (3) A *user* must not lodge a *permanent removal request* more than 20 *business days* before the date on which the *user* requires the *delivery point* to be *permanently removed*.
- (4) *A permanent removal request:*
 - (a) must specify at least the following information:
 - (i) the *MIRN*; and
 - (ii) the *user's GBO identification*; and
 - (iii) the earliest date that the *delivery point* can be *permanently removed*; and
 - (b) if the *user* chooses — may specify the *service order reference*.
- (5) *A permanent removal request* is valid only if:
 - (a) the *MIRN status* is *energised* or *de-energised*; and
 - (b) it relates to a *delivery point* in the *network operator's sub-network*; and
 - (c) it is lodged by the *current user*; and
 - (d) it is lodged within the time period allowed under clause 125(3).



- (6) If a *permanent removal request* was not lodged on a *business day*, then the *network operator* must respond to the *permanent removal request* no later than on the next *business day* as if the *permanent removal request* was lodged on that *business day*.

126. If permanent removal request is not valid

Upon receipt of a *permanent removal request* which is not valid, subject to clause 125(6), a *network operator* must *immediately*:

- (a) reject the *permanent removal request*; and
- (b) *notify the participant* that lodged the *permanent removal request* that the *permanent removal request* has been rejected and provide the reason why the *permanent removal request* is not valid.

{Note: A user wishing to reinitiate a *permanent removal request* that has been *cancelled* must lodge a new *permanent removal request*.}

127. If permanent removal request is valid

- (1) Upon receipt of a valid *permanent removal request*, subject to clause 125(6), a *network operator* must (subject to *law*):

- (a) forthwith accept the *permanent removal request*; and
- (b) *immediately notify* the user that the *permanent removal request* has been accepted; and
- (c) *permanently remove* the *delivery point* and, if there is a *meter* installed at the *delivery point*, at the same time undertake a *meter reading* of, and obtain the *meter reading data* for, the *delivery point*, on the later of:
- (i) the date requested by the user under clause 125(4)(a)(iii); or
- (ii) 5 *business days* after receiving the *permanent removal request*.

{Note: The reason that there may not be a *meter* installed at the *delivery point* is that it may previously have been removed in the course of a disconnection.}

- (2) As soon as practicable after a *delivery point* has been *permanently removed* under clause 125(1) or clause 127(1)(c), and in any event within 5 *business days*, the *network operator* must:

- (a) calculate the *actual value* for the *delivery point* using the information obtained under clause 127(1)(c); and
- (b) change the *MIRN status* to *deregistered*; and
- (c) *notify the user* that the *delivery point* has been *permanently removed*; and
- (d) lodge a *permanent removal confirmation notice* with AEMO; and
- (e) if a *meter reading* was undertaken under clause 127(1)(c), provide AEMO and the user with the *metering data* under clause 107(2). ~~from, as applicable:~~



- ~~(i) the meter reading undertaken under clause 127(1)(c); or~~
- ~~(ii) if there was no meter installed at the delivery point, the meter reading undertaken under clause 107(2) when the meter was removed.~~

Division 3.6.2 – Permanent Removal Confirmation Notice to AEMO

128. Permanent removal confirmation notice

A *permanent removal confirmation notice* must specify at least the following information:

- (a) the *MIRN*; and
- (b) the *GBO identification* of the *network operator* lodging the *notice*; and
- (c) the date on which the *delivery point* was *permanently removed*.

129. Requirements for valid permanent removal confirmation notice

A *permanent removal confirmation notice* is valid only if:

- (a) the *delivery point* exists within the *AEMO registry*; and
- (b) it is lodged by the *network operator* who has an *active GBO identification*; and
- (c) the *MIRN status* is *energised* or *de-energised*;
- (d) the date on which the *notice* is received is on or after the date on which the *delivery point* was *permanently removed*; and
- (e) the date the *delivery point* was *permanently removed* did not occur more than 425 days before the date the *permanent removal confirmation notice* was lodged.

130. If permanent removal confirmation notice is not valid

Upon receipt of a *permanent removal confirmation notice* which is not valid, AEMO must *immediately*:

- (a) reject the *permanent removal confirmation notice*; and
- (b) *notify* the *network operator* that lodged the *permanent removal confirmation notice* that the *permanent removal confirmation notice* has been rejected and provide the reason why the *permanent removal confirmation notice* is not valid.

{Note: A *network operator* wishing to reinitiate a *permanent removal confirmation notice* that has been rejected must lodge a new *permanent removal confirmation notice*.}



131. There is no clause 131

~~131— If AEMO does not receive valid metering data~~

~~(1) If AEMO does not receive valid metering data in accordance with clause 127(2)(e) within 5 business days of receiving a valid permanent removal confirmation notice lodged under clause 127(2)(d) in respect of the same delivery point, AEMO must notify the network operator of this fact.~~

~~(2) If AEMO does not receive valid metering data referred to in clause 127(2)(e) within 10 business days of the date the valid permanent removal confirmation notice is received by AEMO, then AEMO must:~~

~~(a) as soon as practicable cancel the permanent removal confirmation notice; and~~

~~(b) promptly notify the network operator that lodged the permanent removal confirmation notice that the permanent removal confirmation notice has been cancelled and the reason for the cancellation.~~

~~{Note: A network operator wishing to reinitiate a permanent removal confirmation notice that has been cancelled must lodge a new permanent removal confirmation notice.}~~

132. **If permanent removal confirmation notice is valid and valid metering data has been received**

Upon receipt of **both** a valid permanent removal confirmation notice lodged under clause 127(2)(d) ~~and valid metering data in accordance with clause 127(2)(e)~~, AEMO must:

(a) forthwith accept the permanent removal confirmation notice; and

(b) promptly notify the network operator that the permanent removal confirmation notice has been accepted.

{Note: Upon accepting a valid permanent removal confirmation notice under clause 132 ~~and receiving valid metering data in accordance with clause 127(2)(e)~~, AEMO must update the AEMO registry under clause 51(d) by changing the MIRN status to deregistered and provide the user and network operator with the AEMO standing data for the delivery point under clause 53.}

Division 3.6.3 – Deregistering MIRNs

133. **Effect of permanent removal**

(1) Upon accepting a valid permanent removal confirmation notice under clause 132, AEMO must:

(a) forthwith cancel all open transactions in respect of the delivery point; and

(b) promptly notify all affected parties of the cancellation.



- (2) Subject to Division 2.2.3, a *MIRN* with a *MIRN status* of *deregistered* must never be given another *MIRN status*.

{Note: Clause 133(2) renders irreversible the process of removing a *delivery point* and *deregistering* a *MIRN*, except if a valid *error correction notice* has been accepted by AEMO under clause 35(a) in respect of an incorrect *permanent removal confirmation notice*. If no valid *error correction notice* has been accepted by AEMO, then if *gas* supply is to be recommenced at the *delivery address*, a new *MIRN* must be assigned.}

ATTACHMENT B – DOCUMENTATION CHANGES (SEE SECTION 3)

[Blue underline](#) represents additions ~~Red~~ and ~~strikeout~~ represents deletions – Marked up changes

- SA/WA Interface Control Document

8.6. Decommissioning Delivery Points

8.6.1 Transaction Mapping

Physical Transaction	Variation	Logical Flow Short Name	From	To	Transaction Type	Transaction Group	RMR Ref:	BS Ref.
<i>GasMeterNotification/MIRNStatus Update</i>		PR-CON	Network Operator	The <i>Registry</i>	AseXML	SORD	127	3.6.3
<i>MeterDataMissingNotification</i> (WA Only)		PR-MR-ALT	The <i>Registry</i>	Network Operator	AseXML	MDMT	131	3.6.7

8.6.2 Code Summary

This table is a complete list of those codes used within the *Decommission* process to uniquely identify each particular flow.

Identifier	Data Flow Name
PR-CON	Permanent Removal Confirmation Notice
PR-MR-ALT (WA Only)	No Permanent Removal Meter Reading Alert

8.6.3 GasMeterNotification/MIRNStatusUpdate Transaction

8.6.3.1 Physical Transaction

NOTE: The Network Operator GBO ID will be available in the message header.

NOTE: The DateServiceOrderCompleted will always be the date that the MIRN status changed.

GasMeterNotification/MIRNStatusUpdate:

Data Element	Format	Usage	Usage/ Comments	AseXML		
				Occurs	Element Path	Data Type
NMI	String(10)	Mandatory	The MIRN	1..1	NMI	xsd:string length="10"
Checksum	Integer(1)	Mandatory	The MIRN Checksum	Use="optional"	@checksum	xsd:integer" minInclusive="0"maxInclusive="9"
MIRNStatus	String(Enum) "Registered" = a service inlet has been installed at the delivery point "Commissioned"=Commissioned and not decommissioned or permanently removed (including after the delivery point has been reconnected) "Decommissioned"= disconnected (temporary) "Deregistered"= Permanently Removed	Mandatory	The MIRN status must be "Deregistered"	0..1	MasterData/MIRNStatus	An enumerated list of xsd:string values: "Registered", "Commissioned", "Decommissioned", "Deregistered"
DateServiceOrderCompleted	Date (10) ccyy-mm-dd	Mandatory	Provides the date on which the MIRN Status was changed, that is when the MIRN was disconnected.	1..1	DateServiceRequestCompleted	xsd:date

8.6.3.2 Data flow Definition: Permanent Removal Confirmation Notice (PR-CON)

This flow is notification from the network operator that a MIRN has been deregistered.

8.6.3.2.1 AseXML Example Transaction

```

<GasMeterNotification version="r9">
<MIRNStatusUpdate version="r13">
  <NMI checksum="3">5000000002</NMI>
  <MasterData>
    <MIRNStatus>Deregistered</MIRNStatus>
  </MasterData>
</MIRNStatusUpdate>
<DateServiceOrderCompleted>2004-07-01</DateServiceOrderCompleted>
</GasMeterNotification>
  
```

8.6.3.2.2 Event Codes

Event Code Number
202,3013,3018,3400,3407,3410,3411

Note: In all cases the severity of each event will be “Error”.

8.6.4 MeterDataMissingNotification Transaction [\(WA Only\)](#)

8.6.4.1 Physical Transaction

The physical flow for this data interface is captured under section 8.4.4.1

8.6.4.2 Data flow Definition: No Permanent Removal Meter Reading Alert (PR-MR-ALRT)

This is the means to notify the network operator that valid meter data has not been received to action the decommission within the required period.

8.6.4.2.1 AseXML Example Transaction

```

<MeterDataMissingNotification version="r9">
  <CSVMissingMeterData>
  
```

 PROPOSED PROCEDURE CHANGE (PPC)
IN012/17: REMOVE REQUIREMENT TO PROVIDE A METER READ WITH A MIRN STATUS UPDATE FOR
TRANSACTIONS IN SA (INDUSTRY HARMONISATION)

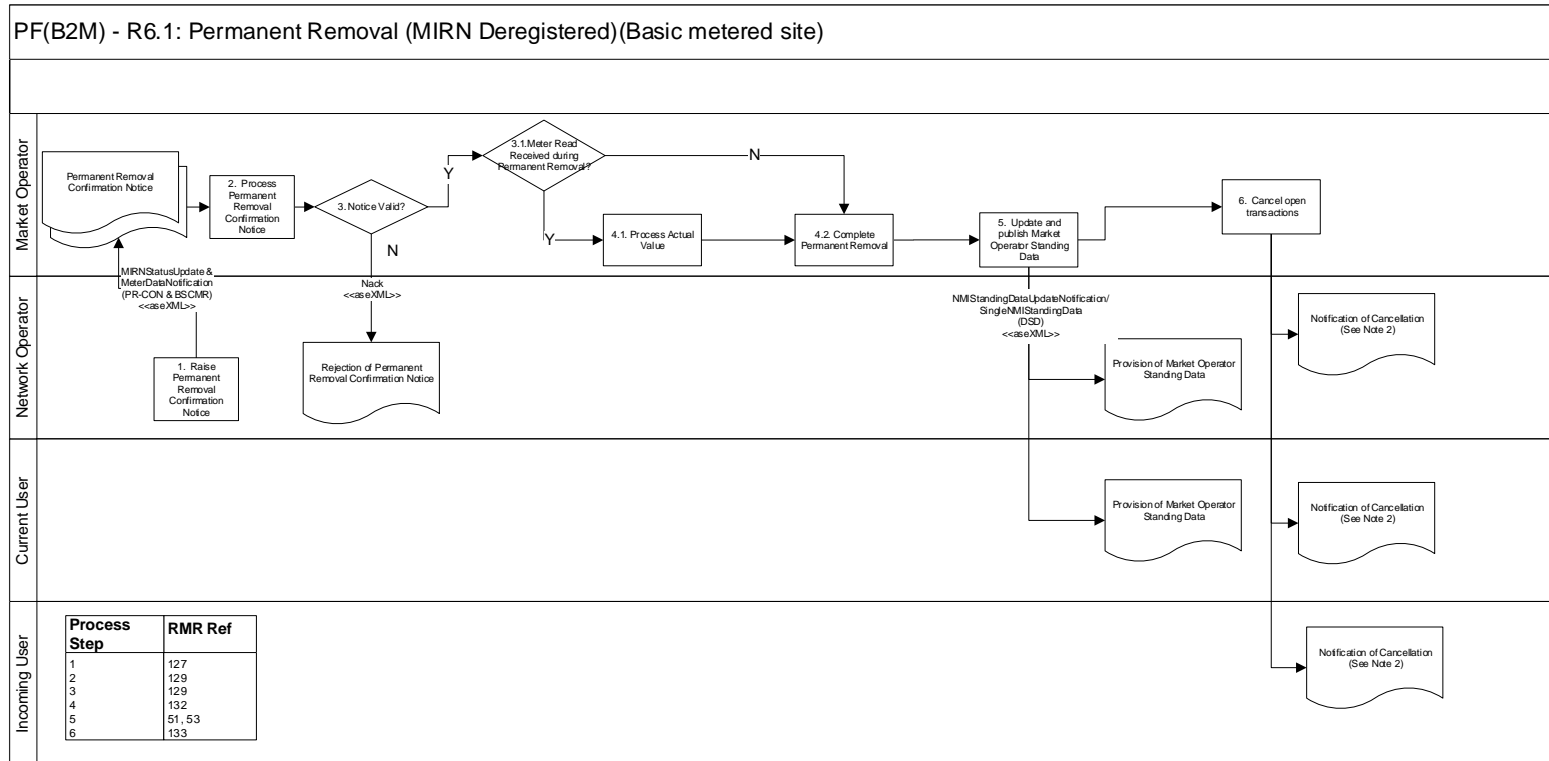


```
<RecordCount>1</RecordCount>  
<CSVData>NMI,NMI_Checksum,Last_Read_Date  
5000000007,2,2004-02-09</CSVData>  
</CSVMissingMeterData>  
</MeterDataMissingNotification>
```

Blue underline represents additions Red and strikeout represents deletions – Marked up changes

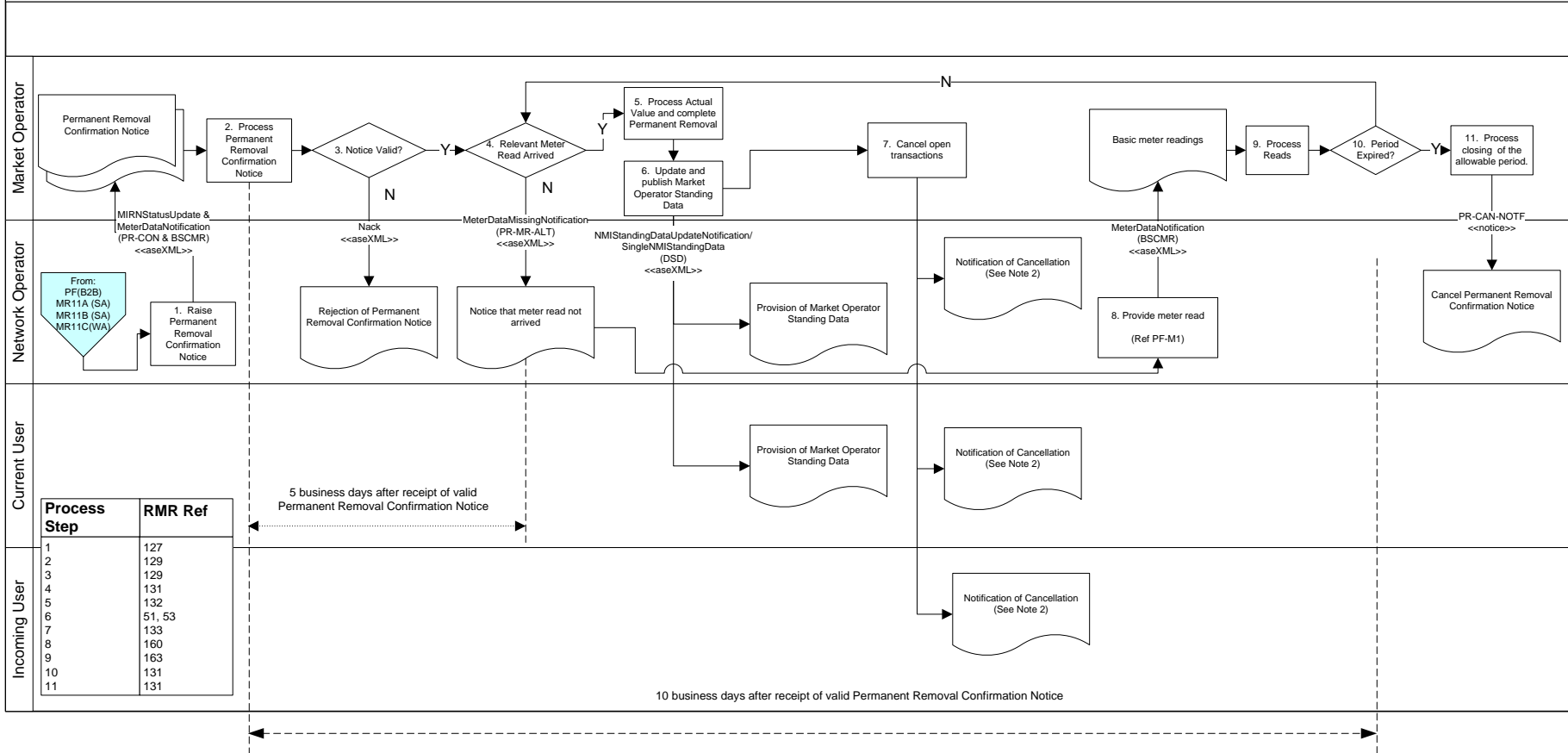
- FRC B2M Process Flows and Sequence Diagrams

PF(B2M) - R6.1: Permanent Removal (South Australia)



Project Information Pack	Page 1	Prepared by Market Operator	Date 14/09/2005
Process Permanent Removal (Basic Metered Site)		Approved by Pending	Date Pending

PF(B2M) - R6: Permanent Removal (MIRN Deregistered)(Basic metered site)



Project Information Pack	Page 1	Prepared by Market Operator	Date 14/09/2005
Process Permanent Removal (Basic Metered Site)		Approved by Pending	Date Pending

- NOTES:**
- (1) Does not include meter read validation process.
 - (2) Four cancellation types:
 - (i) CATSNotification(CANCELLED); TFR-CAN-NOTF; aseXML;
 - (ii) CATSNotification(CANCELLED); ECNET-CAN-NOTF; aseXML;
 - (iii) DIS-CAN-NOTF; Notice;
 - (iv) REC-CAN-NOTF; Notice.