

IMPACT IMPLEMENTATION REPORT (IIR)

Summary Section

| | | | |
|---|--|---|--------------------|
| Issue Number | IN012/17 | | |
| Impacted Jurisdiction(s) | South Australia (SA) | | |
| Proponent | Anthony Boin | Company | APA Group |
| Affected Gas Market(s) | Retail | Consultation process (Ordinary or Expedited) | Ordinary |
| Industry Consultative forum(s) used | Gas Retail Consultative Forum (GRCF) | Date Industry Consultative forum(s) consultation concluded | Monday, 6 May 2019 |
| Short Description of change(s) | Remove requirement to provide a meter read with a MIRN Status Update for Deregistered transactions in SA (Industry Harmonisation) | | |
| Procedure(s) or Documentation impacted | Retail Market Procedures (SA) – V13.0 SA/WA Interface Control Document – version 4.8 FRC B2M Process Flows and Sequence Diagrams ¹ – Version 3.5 | | |
| Summary of the change(s) | <p>Amend relevant clauses in Retail Market Procedures (SA) to remove the requirement to send Meter Data during Deregistration of a MIRN when the meter was previously removed.</p> <p>Amend relevant clauses in SA/WA Interface Control Document to indicate they apply to WA only.</p> <p>Amend FRC B2M Process Flows and Sequence Diagrams to create a new SA version of the flow R6: Permanent Removal and remove steps related to validation check for existence of a meter read and make the sequence diagram R11 applicable to 'WA Only'.</p> <p>Amend system functionality related to MIRN status update for deregistration to remove the validation check for the existence of a meter read transaction.</p> | | |
| I&IR Prepared By | Nandu Datar | Approved By | Michelle Norris |

¹ FRC B2M Process Flows and Sequence Diagrams documentation is part of the AEMO Information Pack suit of documents and therefore is not subject to change process described in Part 15B of the NGR.



Date I&IR published

24 May 2019

**Date Consultation under
135EE or 135EF concludes**

24 June 2019

**Email Address for
Responses**

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**Other key contact
information**



IMPACT & IMPLEMENTATION REPORT

CRITICAL EXAMINATION OF PROPOSAL

1. DESCRIPTION OF AND REASONS FOR CHANGE

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 at the time that the Network Operator sends a GasMeterNotification/MIRNStatusUpdate (Deregistered) transaction for that MIRN.

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

This proposal 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 require a meter reading with a GasMeterNotification/MIRNStatusUpdate transaction, the Network Operator currently is required to retrieve the meter reading from the previous meter remove transaction (GasMeterNotification/MIRNStatusUpdate = "*Decommissioned*").

Note that AEMO and the relevant Retailer would have 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 that the Delivery Point is dismantled (MIRN status updated from *Decommissioned* to *Deregistered*).

This manual process is unnecessarily using resources both within the Network Operator and AEMO. Data analysis indicates that approximately 1,700 reads (annually) are resent manually in the SA market.

Issue 3: RMP inconsistency between jurisdictions

Currently industry RMPs are inconsistent between jurisdictions. The NSW/ACT, VIC and QLD jurisdictions do not require a meter read for GasMeterNotification/MIRNStatusUpdate (Deregistered) transactions, however, 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). In SA, AEMO accepts all transactions before subsequently forwarding a separate cancellation notification email. Consistency between jurisdictions is a desirable outcome.

In SA, 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.

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 be harmonised with changes proposed for SA procedures contained in this proposal.

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: Although there is no need for a transition period, deregistration transactions that are cancelled on the implementation date may still require manual processing.

2. REFERENCE DOCUMENTATION

The following documents are referenced in this IIR:

- Retail Market Procedures (SA) – V13.0
- SA/WA Interface Control Document – version 4.8
- FRC B2M Process Flows and Sequence Diagrams¹ – version 3.5

3. HIGH LEVEL OVERVIEW OF CHANGES

Proposed amendments to the Procedure and Technical Protocols include the following:

- Retail Market Procedure (SA) (Refer to Attachment A for further details):
 - 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. Also, include a subclause that requires the Network Operator to provide a final Meter Read if none was provided previously



- 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
- SA/WA Interface Control Document (Refer to Attachment B for further details):
 - 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 Diagrams¹ are as follows (refer to Attachment C for further details):

- 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
- Indicate the sequence diagram R11 now applies to WA only and amend the timings to bring them in line with the RMP SA

Proposed amendments to systems are as follows:

- Amend AEMO's SA GRMS 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
- AEMO is of the view that there are no system changes for Participants

4. EXPLANATION REGARDING ORDER OF MAGNITUDE OF THE CHANGE

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.



ASSESSMENT OF LIKELY EFFECT OF PROPOSAL

5. OVERALL INDUSTRY COST AND BENEFIT

AEMO has identified the following high-level costs and benefits associated with this IIR:

- The cost of AEMO's IT system changes related to this proposal is in the order of \$6,700. This cost will be higher if AEMO's system does not respond as expected (refer to Section 7)
- There will be a reduction in manual intervention for Network Operators to locate meter data that was previously supplied to AEMO. AEMO estimates that this will save approximately 5 days per month on exception handling for the Network Operator
- Similarly, there will be a reduction in manual intervention required by AEMO to update the MIRN status to *Deregistered*. AEMO estimates that there will be a saving of around 10 person-hours per month
- Harmonisation of gas market procedures and processes between SA, NSW, VIC and QLD jurisdictions that use the FRC Hub for B2B transactions

6. IMPLEMENTATION IMPACTS

As previously identified, these changes will:

- Eliminate the need for the Network Operator to send a meter read while requesting a MIRN Status update to *Deregistered* if it was previously provided during decommissioning of the MIRN, and
- Reduce the manual effort for AEMO in correcting the MIRN status update to *Deregistered*

7. TESTING REQUIREMENTS

Testing of AEMO's IT system will 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.

8. AEMO'S PRELIMINARY ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH SECTION 135EB:

Consistency with the NGL and NGR

AEMO's view is that the proposed RMP changes are consistent with the NGL and cover matters that the RMP may address under Section 135EA(1) of the NGR.

National Gas Objective

"to 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."

As noted in Section 5 of this IIR, the proposal is likely to make the processing of a deregistered site more efficient and less costly both for AEMO and Network Operators. It is therefore 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.



Applicable Access Arrangements

AEMO's view is that the proposed changes in this IIR are not in conflict with existing Access Arrangements. Distributors have not raised concerns with the proposed amendments in relation to their Access Arrangement.

9. CONSULTATION FORUM OUTCOMES

On 15 April 2019, AEMO published a PPC that recommended the changes described in Attachments A to C. Registered participants and interested stakeholders were invited to make submissions by 6 May 2019.

AEMO received submissions from Origin Energy, Energy Australia, APA, AGL and Red/Lumo. The feedback indicated broad support for the proposed changes. Energy Australia, APA, AGL and Red/Lumo proposed further changes. Most of the feedback provided in the submissions related to ensuring that a meter read is sent to AEMO and the User before, or during the deregistration process.

AEMO contacted and spoke with each participant that provided feedback and additionally as a group to arrive at a consensus on the changes to progress within this IIR. These changes are represented in grey shade in Attachments A and C.

All participants issues have now been resolved satisfactorily.

Please refer to Attachment D for participant submissions and AEMO's response to it.



RECOMMENDATION

10. SHOULD THE PROPOSED PROCEDURES AND SYSTEM CHANGES BE MADE?

AEMO recommends that the changes proposed in Attachments A to C be made in accordance with the Consultative Forum outcome. This includes making the necessary systems changes to align with the Procedure and Technical Protocol changes.

11. PROPOSED EFFECTIVE DATE FOR THE PROPOSED CHANGES TO TAKE EFFECT AND JUSTIFICATION FOR THAT TIMELINE

AEMO proposes the following consultation and implementation timelines:

- IIR issued 24 May 2019
- IIR responses due 24 Jun 2019
- Notice of decision – 3 July 2019
- Effective date – 8 August 2019*

Note: The PPC document indicated a proposed effective date of 1 October 2019. Since then further estimates of the timeframe for IT system changes has allowed AEMO to amend the date to 8 August 2019.

*This timeline assumes that no issues are found during testing of AEMO's system.



ATTACHMENT A – DOCUMENTATION CHANGES (SEE SECTION 3)

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

Grey shade represents changes made from PPC to IIR.

- 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 158 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, unless that *meter reading* was previously provided; or
- (iii) if there was no *meter reading* previously provided or available, then provide a final *meter reading*.

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 MORN 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>
</GasMeterNotification>
```

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

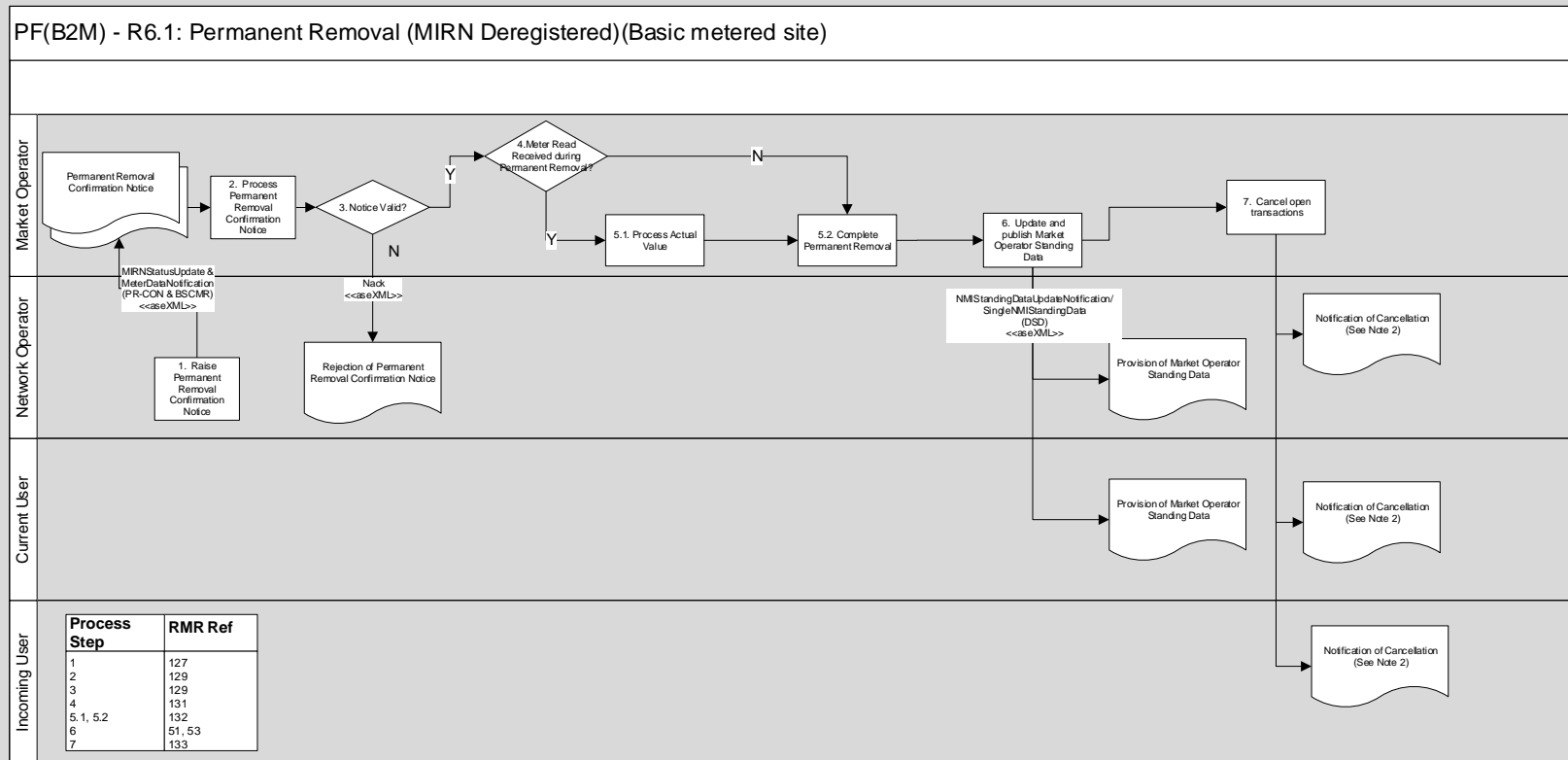



ATTACHMENT C – DOCUMENTATION CHANGES (SEE SECTION 3)

Blue underline represents additions ~~Red~~ and ~~strikeout~~ represents deletions – Marked up changes. Grey shade represents changes made from PPC to IIR.

- FRC B2M Process Flows and Sequence Diagrams¹

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



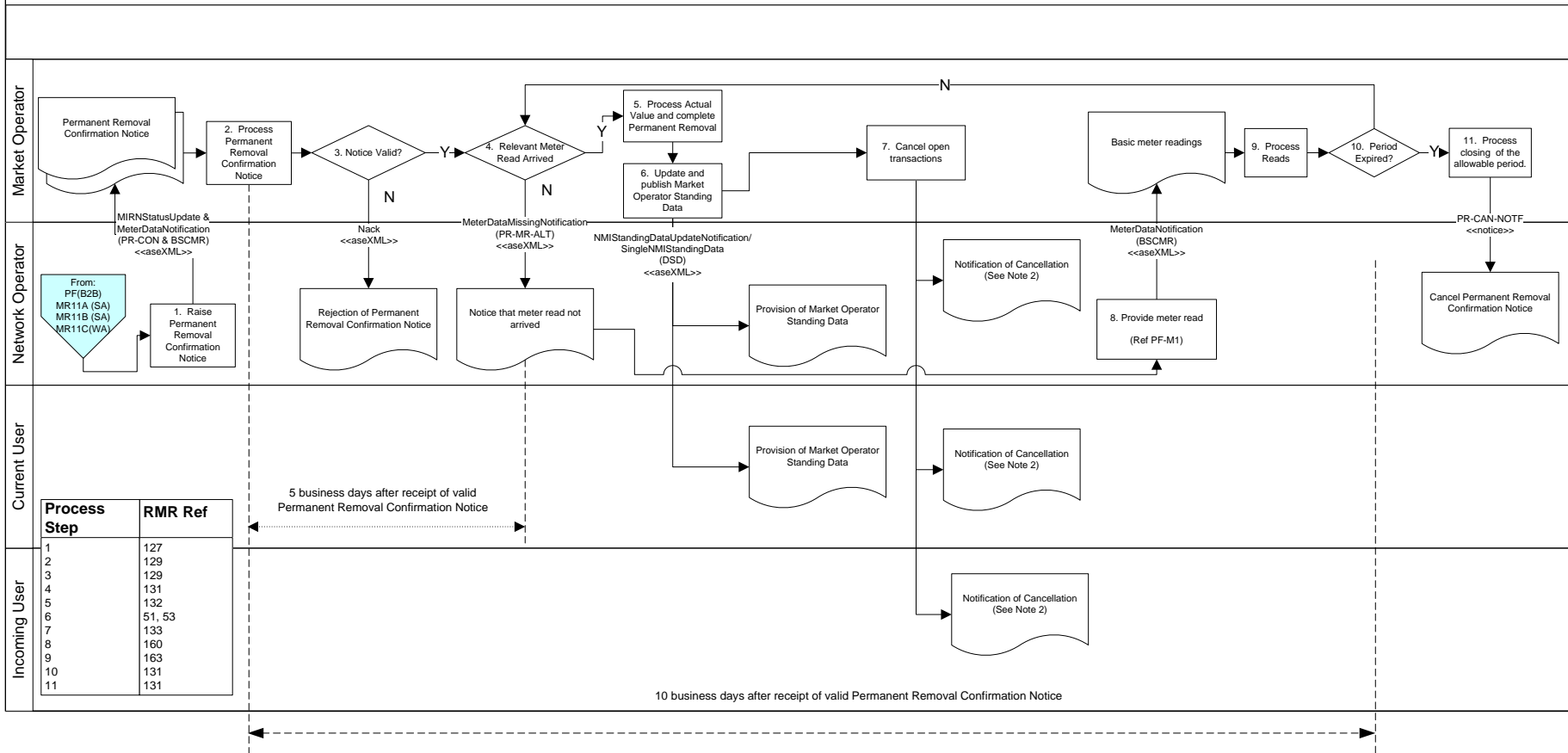
NOTES:

- Does not include meter read validation process.
- Network Operator's internal process to ensure a final meter read is provided to AEMO and User if not already provided
- Future AEMO system change to ensure deregistration only allowed **after** decommission
- Cancellation types:
 - CATSNotification(CANCELLED); TFR-CAN-NOTF; aseXML;
 - CATSNotification(CANCELLED); ECNET-CAN-NOTF; aseXML;

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



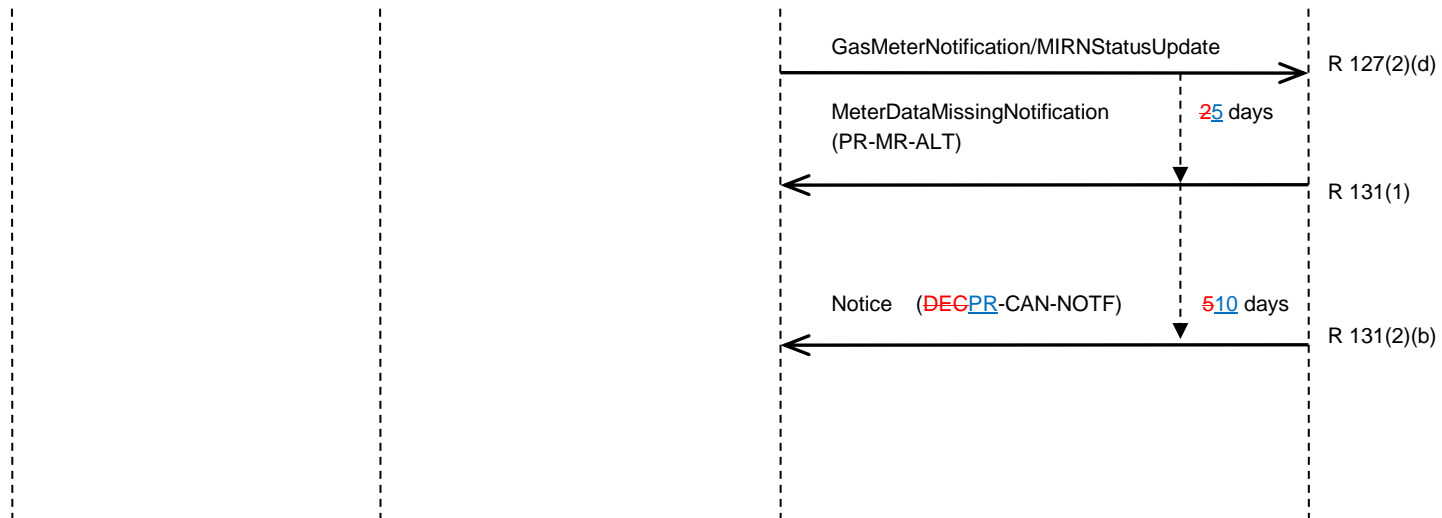
Permanent Removal (Fail to get read) (RMP 127(2)(d) & 131(1))

Incoming
User

Current
User

Network
Operator

AEMO



ATTACHMENT D – SUBMISSIONS RECEIVED FOR CHANGE IN012/17

General Comments on the Proposed Procedure Change

| Topic | Ref# | Company | Please Provide Response Here | AEMO response |
|---|------|------------------|--|--|
| General | 1 | Origin | This proposed change is supported by Origin. | AEMO acknowledges Origin's support |
| Sections 1 to 10 of the PPC sets out details of the proposal. | 2 | APA | Yes | AEMO acknowledges APA's support. |
| Does your organisation support AEMO's assessment of the proposal? | 3 | Energy Australia | <p>The PPC does not account for exceptions where meter data isn't obtained via the disconnection process. In some instances, due to circumstances beyond the retailer's control (e.g. contractors not following the process) the disconnection/permanent removal process occur in practice at the same time and only one service order is sent (either the disconnection or permanent removal "Meter Fix" service order).</p> <p>If the requirement to remove providing the final read is removed completely from the permanent removal process this can create a gap for retailers in the billing process and results in the retailer being unable to bill and close the account on a final read, and potentially ongoing estimated reads.</p> <p>Notwithstanding, we agree with APA and AEMO that unnecessary duplication should be removed and harmonised with other jurisdictions and propose minor wording changes to suggest that a final read is sent in either the disconnection or the permanent removal processes; this ensures that a final read is sent for all instances. We consider these do not have any IT impacts on APA's proposal.</p> | <p>AEMO acknowledges Energy Australia's feedback and advises the following.</p> <p>Most of the submissions related to ensuring that AEMO and the User is provided a meter read before or during the Deregistration process. AEMO interacted with each participant individually and as a group to address participant's concerns and arrived at a consensus on the changes to progress with.</p> <p>There are no dissenting views anymore.</p> <p>Regarding the changes proposed to the SA/WA Interface Control Document, AEMO advises the following.</p> <p>The proposed changes only apply to the deregistration (permanent removal) transaction.</p> |



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| | | | <p>The proposed changes to the SA/WA Interface Control Document indicate that the <i>MeterDataMissingNotification</i> transaction use case for permanent removal is going to be completely removed. As discussed above, a final read might still be needed for exception cases in the permanent removal process where a read has not been obtained via the disconnection process. We recommend either limiting the use case for the transaction during a permanent removal, or a documented manual exceptions process.</p> | |
| | 4 | AGL | <p>AGL considers that the general proposal of requiring a meter read for an upstand removal should not be necessary.</p> <p>However, there is a scenario where the meter is removed, and the DB has no record of the meter removal (either lost paperwork or the result of third party action).</p> <p>If the upstand is removed and there is no final meter reading associated with the abolishment of the connection point, then there is a potential issue for the market.</p> <p>AGL has sought further information from APA on this scenario which is being investigated by APA. AGL believes that this issue needs to be clarified, but still supports further efficiency and harmonisation., noting that this may result in adjustment to other procedures.</p> <p>Regardless, there needs to be clarity that a final meter read is supplied when the site is decommissioned or abolished.</p> | <p>AEMO acknowledges AGL's feedback and advises the following.</p> <p>Most of the submissions related to ensuring that AEMO and the User is provided a meter read before or during the Deregistration process. AEMO interacted with each participant individually and as a group to address participant's concerns and arrived at a consensus on the changes to progress with.</p> <p>There are no dissenting views anymore.</p> |



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| | | | AGL believes that the process can be made efficient, but that there should be a process to request a final meter read, should there be gaps in participant data. | |
| | 5 | Red/Lumo | <p>Red Energy and Lumo Energy (Red and Lumo) do not support the proposed changes to the Retail Market Procedures (RMP) that seek to remove the requirement to provide meter readings at the point of deregistering a MIRN from the market.</p> <p>While we agree with AEMO's assessment that the RMP are inconsistent and in places silent on the abolishment process. Red and Lumo support further initiatives be undertaken to review and harmonise the abolishment process across the RMPs.</p> <p>It is important to note that abolishment of gas supply occurs in two stages, one being the removal of meter (decommission) followed by removal of the upstand (deregistration). In our experience, these can occur independently or concurrently. In order to avoid impacting customers and retailers, it is pertinent that retailers receive an actual removal read from the distributor for the customer's final bill. This is extremely important, as retailers now have obligations to advise customer's that where their bill is based on an estimate, they are able to provide their own reading. This will be impossible for customers who have an upstand but no meter.</p> <p>Should AEMO continue implementing this change, despite our lack of support, we recommend that consequential changes are made to the RMP to clarify that customers (and by virtue retailers) will not be charged post the removal of a meter</p> | <p>AEMO acknowledges Red/Lumo's feedback and advises the following.</p> <p>Most of the submissions related to ensuring that AEMO and the User is provided a meter read before or during the Deregistration process. AEMO interacted with each participant individually and as a group to address participant's concerns and arrived at a consensus on the changes to progress with.</p> <p>There are no dissenting views anymore.</p> |



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| | | | (decommissioning being completed with an actual read). | |
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Feedback on the documentation changes described in Attachment A to C of the PPC.

| ***Participants are to complete the relevant columns below in order to record their response*** | | | | | |
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| Attachment A – Retail Market Procedures (South Australia) | | | | | |
| Participant feedback for this procedure | | | | | |
| Ref # | Company | Clause # | Issue / Comment | Proposed text <i>Red strikeout</i> means delete and <i>blue underline</i> means insert | AEMO Response (AEMO only) |
| 6 | APA | 127(2)(e) | <p>This clause is meant to describe that the network operator must provide AEMO and the user with the meter read taken at the time of permanent removal of the delivery point if there was a meter installed at the time, as per clause 127(1)(c).</p> <p>However, clause 127(2)(e) as currently drafted in the PPC would require the network operator to provide AEMO and the user with the metering data obtained earlier on <u>disconnection</u> under clause 107(2). This is incorrect, the read to be provided is that taken under clause 127(1)(c).</p> | <p>(e) if a <i>meter reading</i> was undertaken under clause 127(1)(c), provide <u>that meter reading to AEMO and the user</u> with the metering data under clause 107(2). From, as applicable:</p> <p>(i) the meter reading undertaken under clause 127(1)(c); or</p> <p>(ii) if there was no meter installed at the delivery point, the meter reading undertaken under clause 107(2) when the meter was removed.</p> | <p>AEMO acknowledges APA's feedback and advises the following.</p> <p>AEMO has amended clause 127(2)(e) (ii) and added subclause (iii) as agreed between AEMO and the participants</p> <p>(ii) <u>if there was no meter installed at the delivery point, the meter reading undertaken under clause 107(2) when the meter was removed, unless that meter reading was previously provided; or</u></p> <p>(iii) <u>if there was no meter reading previously provided or available,</u></p> |

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| | | | | | then provide a final meter reading. |
| 7 | Energy Australia | 127(2)(e) | <p>127(2)(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).</p> <p>As above, this does not account for the scenario if data wasn't obtained via 107(2) (disconnection) but via 127(1)(c) (abolishment service order).</p> <p>The intent of our proposed changes is to ensure that a final meter read is sent regardless, including when a disconnection service order is not sent prior to the abolishment service order, and we are open to alternative wording.</p> | <p>127(2)(e) if a meter reading was undertaken under clause 127(1)(c), provide AEMO and the user with the metering data obtained from either under clause 107(2) or 127(1)(c)</p> | AEMO acknowledges Energy Australia's feedback and requests to refer to response in point 6 above |
| 8 | AGL | 127(2)(e) | <p>The proposed changes to clause 127(2)(e) do not account for a meter reading not previously delivered.</p> <p>Suggest that the clause be amended such that the DB is obliged to ensure that metering data was provided when the meter was removed or when the abolishment occurred.</p> | <p>127(2)(e) ensure that AEMO and the user have been provided with the metering data obtained under clause 127(1)(c) or clause 107(2).</p> | AEMO acknowledges AGL's feedback and requests to refer to response in point 6 above |
| 9 | Red/Lumo | 127 | <p>As outlined in our above response, AEMO's proposed amendments do not allow for the scenario where the meter removal and upstand removal occur at</p> | <p>127(2)(e) if a meter reading was undertaken under clause 127(1)(c) provide AEMO and the user with the metering data under clause 158 from, as applicable:</p> | AEMO acknowledges Red/Lumo's feedback and requests to refer to response in point 6 above |

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| | | | the same time and a final meter reading is required to be undertaken. | <p>8.6.4.3 the meter reading undertaken under clause 127(1)(e); or</p> <p>(ii) if there was no meter installed at the delivery point, the meter reading undertaken under clause 107(2) when the meter was removed.</p> <p>(f) If the MIRN status is deenergised and there was no meter installed at the delivery point, provide the user with the meter reading undertaken under clause 107(2) and 158 when the meter was removed.</p> | |
| 10 | Red/Lumo | 131 | Red and Lumo do not support the removal of this clause as 127(2) allows for the distributor to obtain a meter read if the meter is onsite at the point of deregistration. AEMO should retain the ability | <p>If AEMO does not receive valid metering data</p> <p>(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.</p> <p>(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:</p> <p>(a) as soon as practicable cancel the permanent removal confirmation notice; and</p> | AEMO acknowledges Red/Lumo's feedback and advises that resolution agreed with clause 127(2)(e) also resolves this issue with clause 131. |

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| | | | | <p>(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.</p> <p>{Note: A network operator wishing to reinitiate a permanent removal confirmation notice that has been cancelled must lodge a new permanent removal confirmation notice.}</p> | |
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| ***Participants are to complete the relevant columns below in order to record their response*** | | | | | |
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| Attachment B – SA/WA Interface Control Document | | | | | |
| Participant feedback for this procedure | | | | | |
| Ref # | Company | Clause # | Issue / Comment | Proposed text <i>Red-strikeout</i> means delete and <i>blue underline</i> means insert | AEMO Response (AEMO only) |
| 11 | Energy Australia | SA/WA ICD 8.6.1 | MeterDataMissingNotification (WA Only) As discussed above, the transaction still needs to be used in cases described above where the abolishment and disconnection have been carried out as one process. Therefore, we seek to clarify that the <i>MeterDataMissingNotification</i> can still be used in these exception cases. An alternative would be a documented manual exception process given volumes are expected to be low, however this is not preferred. | MeterDataMissingNotification (WA Only) <u>This transaction must only be used in SA if it is not possible to use the transaction in 8.4.4.</u> | AEMO acknowledges Energy Australia's feedback and advises the following. The proposed changes apply to deregistration (permanent removal) transaction only and hence will apply to WA only. |
| 12 | Energy Australia | SA/WA ICD 8.6.4 | 8.6.4.4 MeterDataMissingNotification Transaction (WA Only) See above | 8.6.4.5 MeterDataMissingNotification Transaction (WA Only) | AEMO acknowledges Energy Australia's feedback and requests to refer to response in point 11 above |
| 13 | Energy Australia | SA/WA ICD 8.6.4.2 | 8.6.4.6 Data flow Definition: No Permanent Removal Meter | 8.6.4.7 Data flow Definition: No Permanent Removal | AEMO acknowledges Energy Australia's feedback and requests |

| | | | Reading Alert (PR-MR-ALRT) | Meter Reading Alert (PR-MR-ALRT) | |
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| | | | See above. The intent is to limit the use case for the transaction in Permanent Removal scenarios. | This transaction must only be used in SA if it is not possible to use the transaction in 8.4.4. | to refer to response in point 11 above |
| 14 | AGL | SA/WA ICD 8.6.4 | AGL does not support the limitation of the transaction to the WA market only. There are always cases where data is not provided due to system or process problems. Therefore, AGL believes that the <i>MeterDataMissingNotification</i> transaction should be retained. | Delete the additions – “WA only” | AEMO acknowledges AGL’s feedback and requests to refer to response in point 11 above |

Participants are to complete the relevant columns below in order to record their response

Attachment C – FRC B2M Process Flows and Sequence Diagrams

Participant feedback for this procedure

| Ref # | Company | Clause # | Issue / Comment | Proposed text Red strikeout means delete and <u>blue underline</u> means insert | AEMO Response (AEMO only) |
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| 1 | APA | PF(B2M) – R6.1 | <p>Re-number process flow steps as suggested in embedded diagram to align Incoming User Process Step/RMR Ref table in diagram (last swim lane) to keep consistent with previous SA and new WA process flow diagrams.</p> <p>Consider adding a Notes section on bottom of page as indicated on embedded diagram.</p> |  PF(B2M) R6.1 20190503.pdf | AEMO acknowledges APA's feedback and has amended the process flow PF(B2M) – R6.1 and sequence diagram SD(B2M) – R11 as per APA's suggestion since it adds further clarity. |
| 2 | APA/AEMO | SD(B2M) – R11 | While discussing APA's feedback AEMO was advised that changes may be required to the sequence diagram SD(B2M) – R11. | The sequence diagram now applies to WA Only. | AEMO acknowledges APA's feedback and has amended the sequence diagram SD(B2M) – R11. AEMO has also amended the timings since they were not in line with the RMP SA. |