

PROPOSED PROCEDURE CHANGE (PPC) – SUMMARY SECTION
(For Proponent or AEMO to complete. Template focuses on solution identification)

Issue Number	IN039/16		
Impacted Jurisdiction(s)	All		
Proponent	Nandu Datar	Company	AEMO
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Affected Gas Market(s) <ul style="list-style-type: none"> ▪ Retail ▪ Wholesale ▪ Bulletin Board ▪ STTM 	Retail	Date proposal sent to AEMO	17 Jan 2017
Short Title	Harmonisation of Password Protection on Customer and Site Details file T900		
Other key contact information	grcf@aemo.com.au		

PROPOSED PROCEDURE CHANGE (PPC) – DETAILED REPORT SECTION

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 describes 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.

Anyone wishing to make a submission for this initial stage consultation is to use the response template provided in attachment D. Submissions close **19 June 2017** and should be e-mailed to grcf@aemo.com.au.

The amendments described in this Proposed Procedure Change (PPC) 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.
- For AEMO,

	<ul style="list-style-type: none"> ○ Modify IT system to remove the test to validate password protection on a T900 file for Victoria and Queensland. ○ Modify IT system by the service provider to only accept a compressed T900 file for South Australia. ● For AEMO amend the TP documentation that places the obligation on Retailers and AEMO IT systems.
<p>2. Reference documentation</p> <ul style="list-style-type: none"> ▪ Procedure Reference ▪ GIP/Specification Pack Reference ▪ Other Reference 	<p>Participant Build Pack 1 – CSV Data Format Specifications v3.3</p> <p>Participant Build Pack 1 – Process Flow Diagrams v3.4</p> <p>FRC B2B System Interface Definitions v4.1</p> <p>Gas Interface Protocol (Victoria) v19.0</p> <p>Specification Pack Usage Guide v6.4</p>
<p>3. The high level details of the change to the existing Procedures</p> <p>This includes:</p> <ul style="list-style-type: none"> ▪ A comparison of the existing operation of the Procedures to the proposed change to the operation of the Procedures. ▪ A marked up version of the Procedure change (see Attachment A). 	<p>In terms of the TP the following is proposed:</p> <ul style="list-style-type: none"> ● 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> ● 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> ● 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>
<p>4. Consequences for making or not making the change(s)</p>	<p>If current process is maintained, the different protection formats will continue to create overheads for retailers and AEMO. Also, manually removing any incorrectly password protected file creates a risk of error for AEMO.</p>
<p>5. Explanation regarding the order of magnitude of the change(s) (eg: material, non-material or non-substantial)</p>	<p>A discussion paper on this proposal was issued to the Gas Retail Consultative Forum (GRCF) at the meeting held on 21 March 2017.</p> <p>Participants were invited to indicate their preference for which option to implement along with an impact analysis by 31 March 2017. AEMO received responses from AGL, Origin Energy, Lumo/Red Energy and M2 Energy. AGL indicated their preference for password protection, Origin Energy and Lumo/Red Energy indicated their preference for no password protection and M2 Energy indicated that they were happy to go with any option but supported a consistent approach.</p> <p>Weighing up the responses received and the fact that retailers place the T900 files onto AEMO’s Marketnet, secure encrypted channel which is restricted only to the retailer that posted the file</p>

	<p>AEMO is of the view that password protection is not warranted. The removal of the password protection is also supported by AEMO's internal IT security, architecture and legal teams.</p> <p>Implementation of this option will require AEMO, its IT service provider and Retailers to make minor system changes. For AEMO at the time of preparing this PPC, the indicative cost to implement this change is not significant.</p> <p>Some Retailers may also need to make an IT system change. At the time of preparing this PPC, it is AEMO's view that the indicative cost to retailers to implement this change is not significant, however if a retailer has evidence that this is not the case, they should include this information in their submission to AEMO as part of the PPC consultation.</p>
<p>6. Likely benefits for industry as a whole</p>	<p>Harmonised process across all jurisdictions reducing the overhead for retailers.</p> <p>Reduction in performing additional steps linked to inclusion of password protection.</p>
<p>7. The likely implementation effect of the proposal on Industry in general and/or any identified parties (e.g. 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 September 2017 (to be confirmed). A transition period is proposed following implementation of changes by AEMO.</p> <ul style="list-style-type: none"> • AEMO to implement the agreed harmonisation changes in September 2017 following which the transition period for current retailers will commence. • A new retailer joining the market will be required to deliver the T900 file in compressed CSV format and no password protection. • AEMO to implement manual or system processes to manage inconsistencies in password protection during the transition period. • The transition period to end September 2018.
<p>8. Testing requirements</p>	<p>Test receipt of compressed T900 files without password protection for Victoria and Queensland by AEMO.</p> <p>Test receipt of compressed T900 files for South Australia by CGI.</p> <p>Test processing T900 files during the transition period by AEMO and CGI.</p> <p>Test sending compressed T900 files without password protection for Victoria and Queensland by Retailers.</p> <p>Test sending compressed T900 files for South Australia by Retailers.</p>

<p>9. Supporting Documentation</p> <p>(attach if necessary)</p>	<p>See attachments A, B, C and D.</p>
<p>10. If applicable, a proposed effective date for the proposed changed Procedures to take effect and justification for that timeline.</p>	<p>Subject to all necessary approval's AEMO is targeting to implement this around September 2017 noting that there will be a transition period of 12 months.</p> <p>To achieve this AEMO proposes the following timeline:</p> <ul style="list-style-type: none"> • Issue PPC 26 May 2017 • Submission on PPC close 19 June 2017 • Issue IIR on 30 June 2017 • Submission on IIR close 28 July 2017 • AEMO decision before 15 August 2017 • Effective date around September 2017 with a transition period end date of 31 August 2018.

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 <effective date of new procedures> the provisions described in (B) does 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) 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.

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

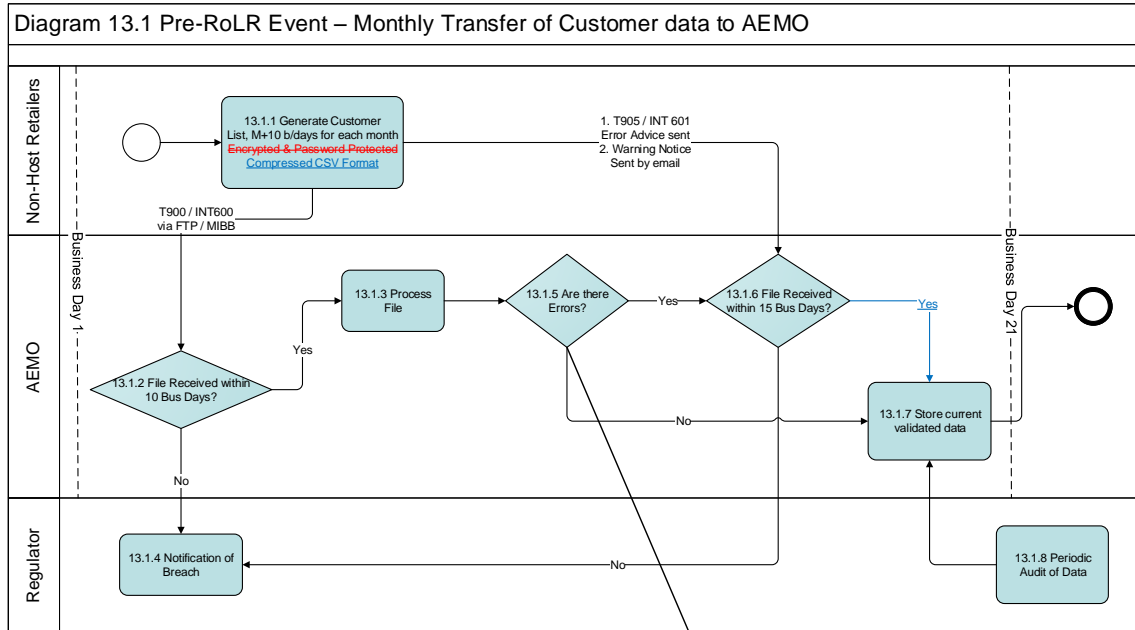
Note: Reference to "all non-Declared Host Retailer" refer to the Hub participant ID.

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



Errors include

- Validation against AEMO Meter Register to match MIRNs in AEMO Meter Register = <warning>
- Field contents where required / mandatory = <error>
- Archive old file as new file delivered and validate with no error
- For the avoidance of doubt – AEMO maintains current file in database only

ATTACHMENT C

Proposed changes: FRC B2B SYSTEM INTERFACE DEFINITIONS

~~Red strikeout~~ means delete and
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 <effective date of new procedures> the provisions described in (B) does 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) For a Retailer that registered before <effective date of new procedures> the file may be provided to AEMO in an uncompressed CSV format 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).

The following file naming convention is to be used:

SAGAS_CUSTOMERSITEDetailsMONTHLY_OriginatorID_RecipientID_CCYYMMDDHHm
mSS

ATTACHMENT D

PPC response template

The PPC response template has been attached separately to this document