

Notice to all Participants,

29 March 2016

Notice of
AEMO decision to amend the
NSW/ACT Retail Market Procedures (RMP)

This notice advises Gas Market Registered Participants that consultation under the ordinary Procedure change consultative process prescribed under Rule 135EE of the National Gas Rules (**NGR**) concluded on 25th February 2016 for:

- **IN032/15 NSW-ACT RMP changes for NSW-ACT Retail Gas Project (NARGP) “Transitional Provisions”.**

Prior to commencing the ordinary consultation process, this proposal was actively considered by the NARGP working groups in accordance with the “Approved Process” under rule 135EC.

As required under rule 135EE of the NGR, Gas Market Registered Participants and other interested parties were invited to submit comments to AEMO on the Impact and Implementation Report (IIR) for this proposal, including draft amendments to the NSW-ACT RMP and other associated documentation which forms part of the new transitional provisions as described in the new part H of the RMP.

Having considered each proposal, AEMO has approved the proposed amendments attached to this notice and has set the effective date for the changes to be **19 April 2016**.

Marked-up and unmarked copies of the new versions of the Retail Market Procedures pertaining to the changes described in Attachment A and other associated documents described will be published prior to 19 April 2016 on the AEMO website.

Attachment B is a consolidated list of the feedback provided during the IIR and AEMO responses to each of the points raised.

Should you require any further information please contact Danny McGowan (03) 9609 8447.

Attachment A – RMP changes

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

Part H TRANSITIONAL PROVISIONS

50.1 Definitions

In this Part:

- (1) *transition* means the activities to be undertaken to allow AEMO, network operators and users to transition from the market arrangements and obligations under the Procedures applicable immediately before the transition period to the market arrangements and obligations under the Procedures applicable immediately after the transition time as a result of the amendments to the Procedures and Gas Interface Protocol for the NSW/ACT Gas Retail Market Project (NARGP).
- (2) *transition plan* means,
 - (a) for the networks sections operated by Jemena and ActewAGL the plan described in Part 2 of Attachment B and section 3.3.2 of attachment D of the NARGP Industry Transition, Cutover and Controlled Production Start Plan for the transition and the provision of certain information established by AEMO in consultation with users and network operators and published on AEMO's website;
 - (b) for the Wagga Wagga and Tamworth network sections operated by Australian Gas Network Limited and APA group respectively, the plan described in (a) above as amended by Attachment C of the NARGP Industry Transition, Cutover and Controlled Production Start Plan for the transition and the provision of certain information established by AEMO in consultation with users and network operators and published on AEMO's website.
- (3) *transition time* means the time when the amendments to the Procedures and Gas Interface Protocol for the NSW/ACT Gas Retail Market Project (NARGP) become effective as determined by AEMO and specified in the notice of effective date published by AEMO.
- (4) *transition period* means the period for the transition, ending immediately before the transition time, to be determined by AEMO and specified in a notice published by AEMO on the AEMO website.

50.2 Transition

- (1) During the transition period:
 - (a) AEMO, users and network operators must use reasonable endeavours to cooperate with each other to facilitate the transition;
 - (b) to the extent that the provision, delivery or receipt of information, notices, documents, requests or reports or other transactions contemplated by the Procedures is provided for in the transition plan, the provisions in the transition plan relating to that matter will apply instead of those in the Procedures and the Gas Interface Protocol; and
 - (c) to the extent that the provision, delivery or receipt of information, notices, documents, requests or reports or other transactions contemplated by the Procedures is not provided for in the transition plan, the Procedures (including the Gas Interface Protocol) will continue to apply in respect of that matter.

Attachment B - Consolidated list of the participant feedback

Item #	Participant	Clause/ Section ref	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response	Final decision outcome
1.	AEMO	RMP clause 51.1(2) a	Participants have requested a Production Verification Testing (PVT) using a small sample size of "live data" be undertaken before the new Procedures take effect. In consultation with Participants, AEMO has made further changes to the version of the Procedures that were issued as part of the IIR. These changes were presented a workshop held •	51.1(2) (a) the plan described in Part 2 of Attachment B <u>and Section 3.3.2 of attachment D</u> of the NARGP Industry Transition, Cutover and Controlled Production Start Plan for the transition and the provision of certain information established by AEMO in consultation with users and network operators and published on AEMO's website;	The further changes (highlighted in blue) to the IIR version of the Clause 51 to provide the regulatory relief for the PVT was discussed at a workshop held 5 th Feb. No Participants opposed the inclusion of these further changes.	RMP changed as per AEMO response.
2.	AEMO	RMP clause 51.1(2) a	For completeness the Transaction Plan isn't limited to just the Jemena network section. It includes ActewAGL network hence this entity should be added.	51.1(2) (a) for the <i>networks sections</i> operated by <i>Jemena</i> <u>and ActewAGL</u> the plan described in Part 2 of Attachment B.....		RMP changed as per AEMO proposed text
3.	EA	RMP Clause 50.1 (2) (b)	Suggest adding in APA/AGNL as the network operator. Maintains consistency with (2) (a) and also makes it clear who the network operator is for the Wagga Wagga Tamworth network section.	For the Wagga Wagga and Tamworth network sections , <u>operated by APA/AGNL</u> , the plan described in	AEMO in part supports the changes but proposes that the proper company names are used. For the Wagga Wagga and Tamworth network sections , <u>operated by Australian Gas Network Limited and APA group respectively</u> , the plan described in ...	RMP changed as per EA's response subject to use of the company names.

4.	Jemena	RMP Clause 50.1(1) definition of transition	<p>In lines 2 to 4 of this definition refer to market arrangements and obligations under the RMPs applicable “immediately before the transition time”. Query whether this should be “immediately before the start of the transition period”.</p> <p>Reason: the transition time will be 2 May, and if these transitional provisions are made, then some market arrangements and obligations will be switched off in the period leading up to 2 May. Therefore the correct description of market arrangements here is to the point in time immediately before the transitionals kick in.</p>		<p>AEMO agrees with Jemena’s point that a text change is required to correctly reflect that the transition is from the market arrangements immediately before the transition period commences.</p> <p>Therefore this clause should be :</p> <p><i>transition</i> means the activities to be undertaken to allow AEMO, <i>network operators</i> and <i>users</i> to transition from the market arrangements and obligations under the <i>Procedures</i> applicable immediately before the transition time <i>period</i> to the market arrangements and obligations under the <i>Procedures</i> applicable immediately after the <i>transition time</i> as a result of the amendments to the <i>Procedures</i> and <i>Gas Interface Protocol</i> for the NSW/ACT Gas Retail Market Project (NARGP).</p>	RMP changed as per Jemena response
5.	Jemena	RMP Clause 50.2(1)(c)	<p>Query whether this provision is needed at all. If AEMO’s view is that it is needed, then the wording might need adjustment – clause 50.2(1)(b) gives the transition plan the status of retail market procedures, for the duration of the transition period. Therefore, clause 50.2(1)(c) should refer to the <i>Procedures</i> – absent the transition plan modification – as continuing to apply.</p>		<p>AEMO’s view is the change is not required. The procedures incorporating the transition plan modification will form version 14.1 of the Retail Market Procedures during the transition period. AEMO considers that clause 50.2(1)(c) is clear that if the provision, delivery or receipt of information, notices, documents, requests or reports or transactions is not provided for in the transition plan modification, then by definition the transition plan modification won’t apply.</p>	No change to the RMP

6.	Jemena	RMP Clause 50.2(1)(b)	Suggested minor wording change: Reason: didn't read quite right to refer to the provision, delivery or receipt of "transactions".	to the extent that the provision, delivery, or receipt of information, notices, documents, requests or reports or other transactions contemplated by the Procedures	<p>AEMO agrees that it is more appropriate to refer to transactions separately from the provision, delivery or receipt of information, notices etc.</p> <p>Therefore this clause should be:</p> <p>During the <i>transition period</i>:</p> <p>(2) AEMO, <i>users</i> and <i>network operators</i> must use reasonable endeavours to co-operate with each other to facilitate the <i>transition</i>;</p> <p>(3) to the extent that the provision, delivery or receipt of information, notices, documents, requests, or reports or other transactions contemplated by the <i>Procedures</i> is provided for in the <i>transition plan</i>, the provisions in the <i>transition plan</i> relating to that matter will apply instead of those in the <i>Procedures</i> and the <i>Gas Interface Protocol</i>; and</p> <p>(4) to the extent that the provision, delivery or receipt of information, notices, documents, requests, or reports or other transactions contemplated by the <i>Procedures</i> is not provided for in the <i>transition plan</i>, the</p>	RMP changed as per Jemena response
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					Procedures (including the Gas Interface Protocol) will continue to apply in respect of that matter.	
7.	AEMO	<p>Transition Plan</p> <p>1)- Attachment C (Industry Plans for transitioning off existing NSWACT function matrix – AGNL/APA Networks) of the NARGP Industry Transition, Cutover and Controlled Production Start Plan.</p> <p>2) – Section 5.2.3. (ITCCPS) plan didn't include the AGNL/APA outage window.</p>	<p>Two workshops were held with Participants on the specific transitional plans for the AGNL/APA network after the IIR was issued. The changes made to the IIR version were developed in consultation with Participants. This updates were reviewed by Participants seeking further feedback by 26th Feb. AEMO received no objections to the updated changes.</p>	<p>1) See embedded word doc that list the specific changes for Attachment C.</p>  <p>FW NARGP AGNL APA Transition Plan</p> <p>2) The following changes to section 5.2.3 are suggested:</p> <p><i>For this version of the NARGP Industry Transition, Cutover and Controlled outage windows for the AGNL/APA is unknown. Determining AGNL/APA topic of discussion in mid-December 2015 as part of the development of</i></p> <p>5.2.3 AGN/APA Outage window <i>For the Tamworth network section, the same outage window described in section</i></p> <p><i>For the Wagga Wagga network section, the following applies:</i> For a 06:30 'go-live' date of Monday 2 May 2016, AGN will from:</p> <ul style="list-style-type: none"> (i) 17:00 on Friday 22 April 2016 stop processing inbound B2B to stop processing inbound B2M transfers from Users. (ii) 17:00 on Wednesday 27 April 2016 stop sending outbound B2M to Users. (iii) Continue sending outbound B2M transactions (ERFT) as per <p><i>For the Wagga Wagga network sections the following applies</i> o-2</p>	<p>Feedback sort from Participants on the said changes raised no issues therefore AEMO supports.</p>	<p>Transition Plan changed as per AEMO response.</p>
8.	APA/AGN		<p>The following comments/clarifications relate to NSW/ACT RETAIL GAS PROJECT (NARGP) – INDUSTRY TRANSITION, CUTOVER AND CONTROLLED PRODUCTION START PLAN</p>			

			Version 4.0 issued 17/2/2016			
9.	APA/AGN	3.6	<p>Approach to develop the Industry Cutover Plan mentions “ Subject to AGNL endorsing the above approach”</p> <p>Needs to be updated to reflect APA/AGN’s involvement</p>		AEMO agrees and the word “APA: has been added	Update made to Industry Transition, Cutover and Controlled Production Start Plan (ITCCPSP).
10.	APA/AGN	4	3rd paragraph is a grammatical change the word take should be taken		AEMO agrees.	Update made to ITCCPSP.
11.	APA/AGN	Attachment C Section 1 Wagga Wagga and Tamworth network sections	Include Part 1 2D.2 SRA is not applicable in WWT.		AEMO isn’t fully across the application of SRA. AEMO has taken the view that APA/AGN is correct in point out this change.	Update made to attachment C as proposed by APA/AGN.
12.	APA/AGN	Attachment C Section 2 Tamworth network Rows 3, 4 & 6	Document references AGN in details column. This needs to be changed to reference APA as the owner of the Tamworth network		AEMO isn’t fully across the particulars in relation this section of the document. AEMO has taken the view that APA/AGN is correct in point out this change.	Update made to attachment C as proposed by APA/AGN.
13.	APA/AGN	Attachment C Section 3 Wagga Wagga network section	Typo: The wording should be “In relation to Wagga Wagga network section” Not Tamworth network section.		AEMO agrees. This is a minor typo	Update made to attachment C as proposed by APA/AGN.
14.	APA/AGN	Attachment C Section 3 Wagga Wagga network section	Part 1 2A.1 & 2A.2 Add comment “Stockpile & if critical raise via BAU ie ring NRC, perform field work & raise as DB SO post go-live.”		AEMO isn’t fully across the particulars in relation this section of the document. AEMO has taken the view that APA/AGN is correct in point out this change.	Update made to attachment C as proposed by APA/AGN.

15.	APA/AGN	Attachment C Section 3 Wagga Wagga network section	2B.2 Change to "Cancel open SO on 24 April" i.e. not 22 April		AEMO isn't fully across the particulars in relation this section of the document. AEMO has taken the view that APA/AGN is correct in point out this change.	Update made to attachment C as proposed by APA/AGN.
16.	APA/AGN	Attachment C Section 3 Wagga Wagga network section	3.1 Basic Meter Reads. Note that AGNL will be reading meters on May 2 in Wagga Wagga		AEMO isn't fully across the particulars in relation this section of the document. AEMO has taken the view that APA/AGN is correct in point out this change.	Update made to attachment C as proposed by APA/AGN.
17.	APA/AGN	Attachment C Section 3 Wagga Wagga network section	3.2 Interval Meter Reads. BAU until COB Sunday 1 May, new format as at Monday 2 May.		AEMO isn't fully across the particulars in relation this section of the document. AEMO has taken the view that APA/AGN is correct in point out this change.	Update made to attachment C as proposed by APA/AGN.
18.	OE	Section 5.2.3	Update 6.2.1 to 5.2.1 as the Tamworth outage will be in line with the Jemena outage.		Agree	Update made to ITCCPSP.
19.	OE	Attachment C High Priority Orders	Please mention in the transition plan that emergency calls for High priority orders post go-live for the Tamworth area will be routed to Envestra – Wagga Wagga (AGNL).		AEMO isn't fully across the particulars in relation this section of the document. AEMO has taken the view that OE is correct in point out this change	Update made to attachment C as proposed by OE.
20.	AEMO	Transition Plan Updates to Attachment B – Industry Plans for transitioning off existing NSWACT function matrix – Jemena Networks Att B Part 2 - 1.A.1	Change log items 1 to 6.  ITCCPS Plan Change Log for NARGP.xlsx		These are items approved by the TCWG at meeting held 11 th Jan and 22 nd Feb	Transition Plan changed as per AEMO response.

		<p>Att B Part 2 - 3A.4, 3A.5 and 3A.6</p> <p>Att B Part 1, Section 2, Sub Section G, 2G.21</p> <p>Att B Part 2 - Sub sec 2A.5 – Meter Readings from NWO to AEMO</p> <p>Att B Part 2 - Sub sec 2A.1 to 2A.5 and 2B.3 to 2B.5 and 3A.1</p> <p>Att B Part 2 - Sub ref 1.B.1</p>				
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