

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

Issue Number	IN013/17		
Proponent	APA	Date of submission	12/01/2018
Affected gas markets	Queensland Retail Market, STTM	Consultation process (Ordinary or Expedited)	Ordinary
Industry consultative forums used	GRCF	Date industry consultative forums consultation concluded	27/04/2018
Short description of change	Queensland UAFG arrangements for where the Distribution UAFG Provider is a Non-Host Retailer.		
Procedures or documentation impacted	Retail Market Procedures (Queensland) version 14.0 Participant Build Pack 4 (Queensland) version 10.0 Gas Interface Protocol (GIP) (Queensland) version 18.0 Distributors UAFG estimation methodology		
Date I&IR published	8/06/2018	Date consultation under 135EE or 135EF concludes	9/07/2018
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IMPACT & IMPLEMENTATION REPORT – DETAILED REPORT SECTION

ASSESSMENT OF PROPOSAL

1. Rationale for the change and summary of any proposed amendments to Procedures.

(see Attachment A for details of the existing Procedure including draft showing the marked up changes)

Currently the Retail Market Procedures (RMP) for Queensland do not make specific reference to Unaccounted For Gas (UAFG). However as a result of the settlement by difference process, 100% of daily UAFG is effectively allocated to the Host Retailer of each distribution network. Clause 6.3.1 (Determination of Aggregated Consumption) allocates daily consumption for each withdrawal zone and distribution region among Users.

Until recently, the contractual arrangements for the supply of physical UAFG have mirrored these RMP arrangements, with the Host Retailer in each network contracting with the Distributor for the supply of UAFG.

However, the most recent contract for UAFG commencing 1 July 2017 in the Allgas network was won by a Non-Host Retailer. As a result, the contractual and current RMP arrangements for UAFG from 1 July 2017 would have been inconsistent, so an interim arrangement between all parties has been agreed for the first year of the contract.

The changes in this Impact and Implementation Report (RMP) as described in attachment A, B and C proposes a formalised permanent solution.

The proposed amendments to the RMP described in attachment A cover:

- General provisions that describe when the clauses apply and the form in which the information is to be provided;
- The registration of a UAFG provider MIRN;
- The obligation on the Distributor to publish a UAFG estimation methodology which includes requirements that the Distributor must consult on any changes;
- Provisions about the Distributor providing estimated consumed energy for the UAFG MIRN to AEMO;
- Provisions about an annual adjustment of allocated UAFG.

The proposed amendments in attachment C cover the Distributors methodology for the estimation of daily UAFG for allocation to the UAFG MIRN for each withdrawal zone and distribution region.

	In summary, the proposed amendments to the Participant Build Pack 4 (Queensland) in attachment B cover - the transactions to be used for the reconciliation process.
2. Overall Industry Cost/Benefit estimate.	<p>APA have indicated that the costs to implement their system and process changes are under \$10K. AEMO cost to setup a new process and perform UAFG wash-up reconciliation process for QLD on a yearly basis will be under \$5k.</p> <p>In term of benefits, this initiative allows for alternative UAFG providers beyond the Host Retailer, increasing competition.</p>
3.The likely implementation effect of the change(s) on stakeholders	<p>Distributors will need to change its interval metering data reporting system to allocate daily estimated UAFG to Allocated UAFG MIRNs (Interval) for reporting to market.</p> <p>Regular monthly process for the Distributor to nominate the anticipated daily UAFG to the UAFG provider ahead of the month.</p> <p>Additional steps in the wash-up process to reconcile UAFG involving User and AEMO.</p>
4. Recommendation on any testing requirements	Nil
5. AEMO's preliminary assessment of the proposal's compliance with section 135EB:	<p>Consistency with NGL and NGR:</p> <p>AEMO's view is that the proposed RMP changes are consistent with the NGL and cover matters that the RMP may deal with under Section 135EA(1) of the NGR.</p> <p><u>National Gas Objective:</u></p> <p>"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."</p> <p>It is AEMO's view that the proposed changes described in this IIR will assist the efficient operation of the retail gas market, and are in the long-term interests of consumers as it promotes retail competition.</p> <p><u>Applicable Access Arrangements:</u></p> <p>AEMO's view is that the proposed changes in this IIR are not in conflict with existing Access Arrangements. The Distributor</p>

	did not raise concerns with the proposed amendments in relation to their Access Arrangement.
6. Consultation forum outcomes	<p>All clauses were agreed and a couple of new clauses were added. Discussion were had around whether this procedure could be applied to the host and non-host retailer. Feedback on the updated and new clauses as well as the discussion on the concept of host and non-host retailer process being the same is due by 4 June 2018.</p> <p>Procedure now updated to have no differentiation between host and non host retailer as the UAFG provider.</p> <p>Procedure now takes into account the need to register a reconciliation MIRN.</p>

RECOMMENDATION(S)	
7. Should the proposed Procedures be made, (with or without amendments)?	AEMO recommends that the changes to the artefacts be made as drafted in Attachment A, B and C.
8. Proposed effective date for the proposed change(s)	<p>The proposed changes as described in attachment A, B and C are to take effect on 1 September 2018.</p> <p>The key milestones to achieve this effective date are:</p> <ul style="list-style-type: none"> • IIR issued on 8 June 2018 • IIR submission close 9 July 2018 • Notice of decision published 30 July 2018.

ATTACHMENT A – DOCUMENTATION CHANGES (SEE SECTION 3)

Blue represents additions Red and strikethrough represents deletions – Marked up changes

Comments may be used to explain changes to the document

Extract of the Retail Market Procedure (QLD). This extract is to be read in conjunction with the current version 14 of the RMP (QLD). Click [here](#) to view version 14 the RMP

Addition to clause 1.1.2 Definitions.

<i>adjustment period</i>	Period agreed between the <i>Distributor</i> and <i>Users</i> for adjusted energy and or delivery
<i>allocated UAFG</i>	Means the <i>UAFG</i> estimated by the <i>Distributor</i> that is sent to <i>AEMO</i> as described in clause 11.2.2
<i>reconciliation MIRN</i>	Means the <i>MIRN</i> that the <i>Distributor</i> registers with <i>AEMO</i> to cater for reconciliation adjusted gas delivery for both the <i>UAFG provider</i> and <i>host retailer</i>
<i>reconciliation quantity</i>	The amount of gigajoules for each <i>withdrawal zone</i> and <i>distribution</i> region provided to <i>Users</i> to enable them to determine whether <i>UAFG</i> is in surplus or shortfall
<i>Total Consumption</i>	All <i>meter readings</i> for all <i>basic meters</i> and <i>interval meters</i> during the <i>UAFG year</i> . This includes <i>UAFG</i> .
<i>Total Injection</i>	<i>Consumed energy</i> from <i>custody transfer meters</i>
<i>UAFG</i>	See definition for <i>unaccounted for gas</i>
<i>UAFG estimation methodology</i>	Means the methodology referred to in clause 11.3
<i>UAFG MIRN</i>	Means the <i>MIRN</i> that the <i>Distributor</i> registers with <i>AEMO</i> with <i>FRO</i> as the <i>UAFG provider</i> for the relevant <i>distribution area</i> as described in clause 11.2.1 for the purpose of allocating a <i>UAFG</i> value.
<i>UAFG provider</i>	Means the <i>retailer</i> who provides <i>UAFG</i> in a <i>distribution area</i> for a <i>UAFG year</i> .
<i>UAFG year</i>	Means a period for <i>UAFG</i> reconciliation commencing at the start of <i>gas day</i> 1 July in any year and concluding at the end of a <i>gas day</i> 30 June for the following year.
<i>Unaccounted for gas</i>	is the difference between the amount of gas injected into the <i>distribution system</i> at all <i>custody transfer meters</i> and the amount of gas withdrawn from the <i>distribution system</i> at all <i>distribution supply points</i> , including but not limited to leakage or other actual losses, discrepancies due to metering inaccuracies and variations of temperature, pressure and other parameters.

New chapter 11 additions.

11.1 General

- (a) The *Distributor* must notify *AEMO* within 30 *business days* of appointing a *UAFG provider*.

11.2 Registration of the UAFG provider MIRN

- (a) No later than 20 *business days* prior to the *UAFG provider* commencing deliveries of *UAFG* the relevant *Distributor* must register with *AEMO* one *interval meter MIRN* for each *withdrawal zone and distribution region* for which the *UAFG provider* has been appointed.
- (b) The registration of the *UAFG MIRN* referred to in clause 11.2 (a) must follow the process for a new *interval meter* referred to in clause 5.2.3 (b).

11.3 Registration of the UAFG reconciliation MIRN

- (a) No later than 20 *business days* prior to the *UAFG provider* commencing deliveries of *UAFG* the relevant *Distributor* must register with *AEMO* the required number of *interval meter MIRNs* for each *withdrawal zone and distribution region*. One *reconciliation MIRN* must have the *host retailer* as the *FRO*, the other *reconciliation MIRN* must have the *UAFG provider* as the *FRO* if the *UAFG provider* is not the *host retailer*.
- (b) The registration of the *UAFG reconciliation MIRNs* referred to in clause 11.3 (a) must follow the process for a new *interval meter* referred to in clause 5.2.3 (b).

11.4 UAFG estimation methodology

- (a) The *Distributor* must publish its *UAFG estimation methodology* on its website.
- (b) The *Distributor* will use reasonable endeavours to ensure the *UAFG estimation methodology* results in the annual *reconciliation quantity* tending towards zero.
- (c) The *Distributor* prior to implementing changes to the published *UAFG estimation methodology* must
 - (i) provide *Users* and *AEMO* with the proposed change to the *UAFG estimation methodology*; and
 - (ii) allow a reasonable time to receive *Users* and *AEMO* responses to the proposed changes to the *UAFG estimation methodology*.

11.5 Provision of estimated consumed energy for the UAFG MIRN

- (a) For each *gas day* the *Distributor* must apply the *UAFG estimation methodology* to calculate the estimated daily *UAFG* for each *withdrawal zone and distribution region*.
- (b) The *Distributor* must communicate the estimated *UAFG* for each *withdrawal zone and distribution region* for each day to the *UAFG provider* in an agreed time and format.
- (c) At the end of each *gas day* the *Distributor* must allocate the daily *UAFG* amount for each *withdrawal zone and distribution region* to

the associated *UAFG MIRN* which has been agreed with the *UAFG provider*.

- (d) The *Distributor* must provide the daily estimated *UAFG* for the *UAFG MIRN* with the energy data for *interval meters* in accordance with the delivery timeframes set out in clause 5.5.
- (e) *AEMO* must use the data in clause 11.4 (b) for settlement purposes.

11.6 Annual adjustments of allocated UAFG.

11.6.1 AEMO to provide annual injection data

Within 10 *business days* of issuing the nine calendar month revision for June of the *UAFG year*, *AEMO* will provide the *consumed energy* for *custody transfer meters* for the *UAFG year* to the *Distributors*.

11.6.2 Distributor, and Users to agree data.

- (a) Within 25 *business days* having received the data referred to in clause 11.6.1 each *Distributor* must for each *withdrawal zone and distribution region*.
 - (i) provide each *User* with all *meter readings* for all *basic meters* and *interval meters* during the *UAFG year* for which the *User* was the *FRO* during the *UAFG year*;
 - (ii) where the *meter readings* for *basic meters* in clause 11.6.2(a)(i) span two *UAFG years*, the *Distributor* must allocate the *meter reading* between the two *UAFG years* in proportion to the applicable *NSL*; and
 - (iii) send the data referred to in clause 11.6.1 and 11.6.2 (a) (i) to *Users*.
- (b) The data referred to in clause 11.6.2 (a) (i) and (ii), must be agreed between *Distributors* and *Users* within 40 *business days* from the day on which the data was received.
- (c) If the *User* does not agree with the data provided in clause 11.6.2 (a) (i) and (ii), the *User* must resolve the query with the *Distributor* within the time frame set out in 11.6.2(b).
- (d) When the *Distributor* receives agreement from all *Users*, *Distributors* must provide *AEMO* the agreed consumption data within 10 *business days* after the time period referred to in clause 11.6.2 (b) has elapsed.

11.6.3 AEMO to determine reconciliation quantity.

- (a) Within 25 *business days* after receiving the data referred to in clause 11.6.2. (d), *AEMO* must calculate the annual *reconciliation quantity* for each *withdrawal zone and distribution region* in accordance with this clause based on the data provided by the *Distributors*.
- (b) *AEMO* will apply the following formula to calculate the *reconciliation quantity*.

Reconciliation quantity = Total Injection – Total consumption

- (c) Within 10 *business days* after calculating the annual *reconciliation quantity* under clause 11.6.3 (b), which will include an indicator to signify whether the annual *reconciliation quantity* is in surplus or shortfall, AEMO must provide the annual *reconciliation quantity*, to the *Distributor*, *UAFG provider* and the *host retailer*.

11.6.4 Users reconciliation.

- (a) Within 20 *business days* of having received the annual *reconciliation quantity* under clause 11.6.3 (c), the *UAFG provider* and the *host retailer* must agree on the *UAFG* adjusted gas deliveries and timeline to resolve their respective surplus or shortfall position for each *withdrawal zone and distribution region*.
- (b) Within 10 *business days* after agreeing to the *UAFG* adjusted gas deliveries and timeline referred to in clause 11.6.4 (a), the *UAFG provider* must provide the *Distributor* the agreed *UAFG* adjusted gas deliveries and timeline for each *withdrawal zone and distribution region*.
- (c) Daily *reconciliation quantities* must commence from the first day of the next month that is, at least 10 *business days* after the date the total *reconciliation quantity* is agreed, unless otherwise agreed by the *Distributor*, *host retailer* and *UAFG provider*.
- (d) The daily *reconciliation quantity* will be limited to 500GJ per day plus one day at less than 500GJ to ensure the entire annual *reconciliation quantity* is recovered.
- (e) The *Distributor* provides the daily *reconciliation quantity* as energy values to the relevant *reconciliation MIRN*.
- (i) If the daily *reconciliation quantity* was positive (surplus) the agreed daily *reconciliation quantity* is sent to the *UAFG provider reconciliation MIRN* as a positive value (*host retailer* provided some of the *UAFG* as the estimate was too low)
- (ii) If the daily *reconciliation quantity* was negative (shortfall) the agreed daily *reconciliation quantity* is sent to the *host retailer reconciliation MIRN* as a positive value (*UAFG provider* gave too much *UAFG* as the estimate was too high)
- (iii) Otherwise the daily *reconciliation quantity* is zero
- (f) For the avoidance of doubt:
- (i) The responsibilities of the *UAFG provider* extend until the last *gas day* for which a daily *reconciliation quantity* is required for the period they were the *UAFG provider*.
- (ii) The changes apply to all *UAFG years* that end after the effective date of the Procedure (i.e. will include *UAFG year 2018/2019*)

ATTACHMENT B – DOCUMENTATION CHANGES (SEE SECTION 3)

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

Comments may be used to explain changes to the document

Extract of the Participant Build Pack 4 (PBP4) changes (QLD). This extract is to be read in conjunction with the current version 10 the Participant Build Pack (QLD). Click [here](#) to view version 10 of the PBP4.

Additions to section 5 New transactions for Queensland.

5.13 Distribution Unaccounted for gas UAFG

This section details the transactions to be used for the UAFG process described in chapter 11 of the Queensland Retail Market Procedures (RMP).

5.13.1 CTM injection report (T600)

This section describes the transactions by which:

- (i) AEMO provides consumed energy for custody transfer meters to the Distributor under clause 11.5.1 of the RMP;
- (ii) The distributor provides the consumed energy for custody transfer meters to the usages under clause 11.5.2 (a) (ii) of the RMP.

<u>Transaction Definition</u> <u>Table cross-reference</u>	<u>600 CTM Injection Report</u>
<u>Trigger</u>	<u>10 business days of issuing the nine calendar month revision for June of the UAFG year</u>
<u>Pre-conditions</u>	<u>None</u>
<u>Post-conditions</u>	<u>None</u>
<u>Transaction acknowledgment</u> <u>specific event codes</u>	<u>None</u>

The following data elements are to be supplied with the transactions:

<u>Transaction:</u>	<u>600 CTM Injection Report</u>
<u>Received From:</u>	<u>AEMO</u>
<u>Sent To:</u>	<u>Distributor</u>

<u>Data Element</u>	<u>Mandatory/Optional/Not Required</u>	<u>Usage</u>
<u>uafg_year</u>	<u>M</u>	<u>YYYY YY</u> <u>Current UAFG year</u> <u>2018 19</u> <u>2019 20</u>
<u>State</u>	<u>M</u>	<u>QLD</u>
<u>statement_version_id</u>	<u>M</u>	<u>Monthly statement version used for ini_gj</u>
<u>version_from_date</u>	<u>M</u>	
<u>version_to-date</u>	<u>M</u>	
<u>Inj_gj</u>	<u>M</u>	<u>Aggregated Injections by Distributor by Withdrawal Zone for UAFG Year (positive)</u>
<u>Distributor_id</u>	<u>M</u>	
<u>Distributor_name</u>	<u>M</u>	
<u>Wd_zone_id</u>	<u>M</u>	
<u>Wd_zone_name</u>	<u>M</u>	
<u>created_date</u>	<u>M</u>	

5.13.2 Meter readings for basic meters (T605)

This section describes the transactions by which the distributor is to provide the meter readings to users.

<u>Transaction Definition Table cross-reference</u>	<u>605 Meter readings for basic meters</u>
<u>Trigger</u>	<u>Receipt of the T600 CTM Injection Report</u>
<u>Pre-conditions</u>	<u>None</u>
<u>Post-conditions</u>	<u>None</u>
<u>Transaction acknowledgment specific event codes</u>	<u>None</u>

The following data elements are to be supplied with the transactions:

<u>Transaction:</u>	<u>605 Meter readings for basic meters</u>
<u>Received From:</u>	<u>Distributor</u>
<u>Sent To:</u>	<u>Retailer</u>

<u>Data Element</u>	<u>Mandatory/Optional/Not Required</u>	<u>Usage</u>
<u>MIRN</u>	<u>M</u>	
<u>Invoice Number</u>	<u>M</u>	
<u>Transaction Id</u>	<u>M</u>	
<u>Transaction Date</u>	<u>M</u>	
<u>Adjustment Indicator</u>	<u>M</u>	<u>C = Cancelled transaction</u> <u>R = Rebilled transaction</u> <u>N = New transaction</u>
<u>Period</u>	<u>M</u>	
<u>Billing Days</u>	<u>M</u>	
<u>Type of Read</u>	<u>M</u>	<u>A = Actual</u> <u>E = Estimated</u> <u>S = Substituted</u> <u>C = Customer own read</u>
<u>Consumption MJ</u>	<u>M</u>	
<u>Current Read Date</u>	<u>M</u>	
<u>Previous Read Date</u>	<u>M</u>	
<u>Distributor ID</u>	<u>M</u>	
<u>Network Tariff Code</u>	<u>M</u>	
<u>Current NSL Split</u>	<u>O</u>	

5.13.3 Queries on data issues (T610)

This section describes the transactions by which the Users submit queries if they find any issues in the consumption data provided by Distributors.

<u>Transaction Definition Table cross-reference</u>	<u>610 Queries on data issues</u>
<u>Trigger</u>	<u>Receipt meter readings for UAFG year</u>
<u>Pre-conditions</u>	<u>None</u>
<u>Post-conditions</u>	<u>None</u>
<u>Transaction acknowledgment specific event codes</u>	<u>None</u>

The following data elements are to be supplied with the transactions:

<u>Transaction:</u>	<u>610 Queries on data issues</u>
<u>Received From:</u>	<u>Retailer</u>
<u>Sent To:</u>	<u>Distributor</u>

<u>Data Element</u>	<u>Mandatory/ Optional/Not Required</u>	<u>Usage</u>
<u>MIRN</u>	<u>M</u>	
<u>Invoice Number</u>	<u>M</u>	
<u>Transaction ID</u>	<u>M</u>	
<u>Transaction Date</u>	<u>M</u>	
<u>Adjustment Indicator</u>	<u>M</u>	
<u>Period</u>	<u>M</u>	
<u>Billing Days</u>	<u>M</u>	
<u>Type of Read</u>	<u>M</u>	
<u>Consumption MJ</u>	<u>M</u>	
<u>Current Read Date</u>	<u>M</u>	
<u>Previous Read Date</u>	<u>M</u>	
<u>Distributor ID</u>	<u>M</u>	
<u>Network Tariff Code</u>	<u>M</u>	
<u>Current NSL Split</u>	<u>O</u>	
<u>Comments</u>	<u>M</u>	<u>User Comments on Data issues</u>

5.13.4 Reconciliation quantity (T615)

This section describes the transactions by which AEMO will provide the data to the distributor, UAFG Provider and the host retailer.

<u>Transaction Definition Table cross-reference</u>	<u>615 Reconciliation quantity</u>
<u>Trigger</u>	<u>Receipt of the agreed consumption data</u>
<u>Pre-conditions</u>	<u>None</u>
<u>Post-conditions</u>	<u>None</u>
<u>Transaction acknowledgment specific event codes</u>	<u>None</u>

The following data elements are to be supplied with the transactions:

<u>Transaction:</u>	<u>615 Reconciliation quantity</u>
<u>Received From:</u>	<u>AEMO</u>
<u>Sent To:</u>	<u>Distributor/HostRetailer/UAFG Provider</u>

<u>Column Name</u>	<u>Mandatory/Optional</u>	<u>Comment</u>
<u>UAFG Year</u>	<u>M</u>	<u>YYYY YY</u> <u>Current UAFG year</u> <u>2018 19</u> <u>2019 20</u>
<u>consumption</u>	<u>M</u>	<u>GJ</u>
<u>Distributor_id</u>	<u>M</u>	
<u>Distributor_name</u>	<u>M</u>	
<u>Wd_zone_id</u>	<u>M</u>	
<u>Wd_zone_name</u>	<u>M</u>	

New Transactions to be added to Appendix A (Table of Transactions)

Ref No	X Ref	Basic, Interval or Both	GIP NO N-GIP	Category	Procedure Ref	Comment in ref to Procedure	Process Map ID	Trans Type	Trigger	From	To	Purpose	Type	Method	Data Elements - Received	Data Elements - Sent back	Comments
600		Interval	GIP		11.5.1			CTM Injection Report	10 business days of issuing the nine calendar month revision for June of the UAFG year	AEMO	Distributor	Provides consumed energy for customer transfer meters to the Distributor	M2B	Email	uafg_year State statement_version_id version_from_date version_to_date Inj_gj Distributor_id Distributor_name Wd_zone_id Wd_zone_name created_date	N/A	

605		Basic	GIP		11.5.2 (a)(i)			Meter readings for basic meters	Receipt of the T600 CTM Injection Report	Distributor	Users	Provides basic meter data to users			MIRN Invoice_Number Transaction_Id Transaction_Date Adjustment_Indicator Period Billing_Days Type_of_Read Consumption_MJ Current_Read_Date Previous_Read_Date Distributor_ID Network_Tariff_Code Current_NSL_Split	N/A	
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610		Both	GIP		11.5.2 (c)			Queries on data issues	Receipt meter readings for UAFG year	User	Distributor	Queries provided meter data			MIRN Invoice Number Transaction_ID Transaction_Date Adjustment_Indicator Period Billing_Days Type_of_Read Consumption_MJ Current_Read_Date Previous_Read_Date Distributor_ID Network_Tariff_Code	N/A	
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														Current_NSL_Split		
														Comments		
615		Both	GIP		11.5.3			Reconciliation quantity	Receipt of the agreed consumption data	AEMO	Distributor/Users	Provides reconciliation quantity and advises whether it is in surplus or shortfall.		UAFG_Year consumption Distributor_id Distributor_name Wd_zone_id Wd_zone_name		

ATTACHMENT C – DOCUMENTATION CHANGES (SEE SECTION 3)

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

Comments may be used to explain changes to the document

The UAFG estimation methodology referred to in RMP clause 11.3.

The estimation of daily UAFG for allocation to the *UAFG MIRN* for each *withdrawal zone* and *distribution region* is calculated by the *Distributor* and advised to the *UAFG provider* prior to the commencement of each month.

The estimation of daily UAFG for allocation to the *UAFG MIRN* for each *withdrawal zone* and *distribution region* is based on the Moving Annual Total (MAT) UAFG for the previous 12 months, divided by 365 and applied evenly over each day of the following month.