

IMPACT & IMPLEMENTATION REPORT (WA) – SUMMARY SECTION

(For AEMO to complete and administer)

Procedure Change Number	IN003/18W		
Impacted jurisdiction(s)	Western Australia		
Proponent	Nandu Datar	Company	AEMO
Industry consultative forum(s) used	Procedure Change Committee (“PCC”)	Date concluded by Procedure Change Committee (“PCC”)	27 September 2018
Chapter 9 Consultation process (Ordinary or Expedited)	Ordinary		
Short description of change(s)	Proposed changes to resolve a minor inconsistency with the FRC B2B System Interface Definition documentation.		
Procedure(s) or documentation impacted	Retail Market Procedures (WA) ver 4.0		
Summary of the change(s)	<p>Modify the RMP WA to include a definition for ‘address based identifiers’. Update clause 14 to describe a process to be followed for adding an address-based identifier (refer Attachment A).</p> <p>Modify FRC B2B System Interface Definition to remove specific reference to address attributes (refer Attachment B).</p> <p>This IIR has been prepared in accordance with clause 382 of the RMP and is raised for consideration by gas retail market participants. As per clause 383 AEMO considers that an ordinary process is applicable and seeks submissions on the proposed changes which can be e-mailed to pccwa@aemo.com.au.</p>		
I&IR prepared by	Nandu Datar	Approved by	Michelle Norris
Date IIR published	12 October 2018	Date consultation under clause 383 or 384 concludes	12 November 2018
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IMPACT & IMPLEMENTATION REPORT (WA) – DETAILED REPORT SECTION

CRITICAL EXAMINATION OF PROPOSAL

1. Description of change(s) and reasons for change(s)

Issue:

In February 2018, ATCO and Synergy raised an enquiry with AEMO about transactions being rejected that contained a flat or unit type value of 'BLDG'. Upon investigation, AEMO identified that 'BLDG' is not one of the current list of allowable values in one of AEMO's WA IT systems known as the Low Volume Interface (LVI). AEMO's WA IT system has been configured to align with the flat or unit types specified in the FRC B2B System Interface Definition document (see Attachment A). 'BLDG' is not specified as a unit or flat type in this document.

AEMO has had discussions with ATCO and CGI about this issue. Those discussions revealed that in 2016/2017, there was an industry wide clean-up of the street types including the flat or unit type. At that time WA participants, updated their IT systems with the schema file enumerations 6.0. It appears that the then WA scheme administrator (REMCo) was unaware that the clean-up process introduced additional valid flat types. Consequently, the WA scheme documentation was not updated and therefore not in sync with participants systems¹. It also appears that REMCo's (now AEMO's) IT service provider (CGI) was not advised to make the change to the WA IT system.

Proposal:

To resolve this issue, AEMO initially proposed 3 options as follows:

- Option 1 – Remove the specific attribute from the interface document, and instead adopt the concept used in other jurisdictions. This concept uses the rapid change process described in the ASWG Change Management Process Guide.
- Option 2 - Update the FRC B2B system interface document with the new attribute. A Procedure Change Consultation will be required for any changes.
- Option 3 - Removing the “hardwiring” of technical attributes from the AEMO Specification Pack and replace with AEMO publishing on its website a note advising that WA has elected to use Enumerations.xsd version 6.0 for address enumeration values.

Most participants supported Option 1.

¹ Whilst not conclusive AEMO believes that Alinta, AGL and OE have their IT systems aligned with the FRC B2B System Interface Definition document rather than ver 6 of the Enumeration file.

	<p>Option 1 proposed that the WA jurisdiction adopt the streamlined process described in section 2.1.2 of the aseXML Standards Working Group (ASWG) Change Management Process document. Click here to view this document. This process permits any participant to raise a change request for the addition of any new address type attributes.</p> <p>The address type attributes are:</p> <ul style="list-style-type: none"> • AustralianStreetType; • AustralianStreetSuffix; • AustralianFlatOrUnitType; • AustralianFloorOrLevelType; and • AustralianPostalDeliveryType. <p>ASWG is a committee that approves any addition to the address attributes. Click here to view the ASWG terms of reference.</p> <p>The Network Operator ATCO did not support aligning WA's address attributes with AEMO's current version of the enumerations. ATCO's view was that addressing the standards set by the statutory authority of the Western Australian Land Information Authority (Landgate) must be adhered to. ATCO's view was that including a new addressing attribute (added in another jurisdiction which isn't prescribed by Landgate), cannot be added into WA because it would jeopardise the WA standard.</p> <p>AEMO proposed a forth option (Option 4) that included Option 1 RMP changes and also included details about publishing the WA list of prescribed address attributes on AEMO website. (Refer Attachment C).</p> <p>AEMO has proposed to implement Option 4 to ensure it complies with WA standards.</p>
<p>2. Reference documentation</p> <ul style="list-style-type: none"> ▪ Retail Market Procedure (the "Procedures"); ▪ AEMO Business/Information Specification Pack Reference; and/or ▪ Other Reference. 	<p>Retail Market Procedures (WA) version 4.0 FRC B2B System Interface Definition version 4.3; and Specification Pack User Guide version 4.7.</p>
<p>3. The high-level details of the change(s) to the existing Procedure This includes:</p> <ul style="list-style-type: none"> ▪ a comparison of the existing operation of the Procedure to the proposed change to 	<p>Modify the RMP WA to include a definition for 'address based identifiers'. Update clause 14 to describe a process to be followed for adding an address-based identifier (refer Attachment A). Modify FRC B2B System Interface Definition to remove specific reference to address attributes (refer Attachment B).</p>

<p>the operation of the Procedure; and</p> <ul style="list-style-type: none"> ▪ a marked up version of the proposed Procedure changes (see Attachment A) 	
<p>4. Explanation regarding the order of magnitude of the change (e.g. material, non-material or non-substantial)</p>	<p>AEMO will require minor system changes to incorporate the attributes currently not in schema R13 and recertify. Participants who haven't applied enumeration file version 6.0 will need to make IT system changes and recertification if required. AEMO considers the order of magnitude of this change is 'non-substantial'.</p>

ASSESSMENT OF LIKELY EFFECT OF PROPOSAL

<p>5. Overall Industry cost/benefit analysis (tangible / intangible / risk) and/or cost estimates</p>	<p>Transactions that have address attribute fields can be processed without hindrance as the validation criteria will be in sync with the documentation. This change will allow customers to be serviced expediently as the technical issues will be resolved.</p>
<p>6. The likely effect of the change(s) on stakeholders (e.g. industry or end-users)</p>	<p>The preferred option will make it easier to add a new address attribute without going through a Chapter 9 consultation process. AEMO and potentially some participants will need to make minor IT system changes.</p>
<p>7. Testing requirements</p>	<p>Recertification by AEMO and participants</p>
<p>8. AEMO's preliminary assessment of the proposal's compliance with clause 378 of the RMP</p>	<p><u>Ensure that the retail gas market operates and is governed in a manner that is, (i) open and competitive; (ii) efficient; and (iii) fair to participants and their customers.</u> AEMO's view is that the proposed change will continue to promote competition, is not unreasonably costly to implement and doesn't disadvantage participants and their customers.</p> <p><u>Ensure compliance with all applicable laws.</u> AEMO's view is that the proposed changes are consistent with the applicable laws.</p> <p><u>Ensure effective consultation occurs and gives stakeholder's opportunities to provide feedback of the proposed changes.</u> AEMO's view is that the stakeholders have already provided feedback to the PCR and are invited to provide feedback as part of this round of consultation.</p>

<p>9. Consultation forum outcomes (e.g. the conclusions made on the change(s), whether there was unanimous approval, any dissenting views)</p>	<p>On 29 August 2018 AEMO published on its website a PCR that recommended minor documentation changes as described in Attachment A and B. Registered participants and interested stakeholders were invited to make submissions which closed on 27 September 2018.</p> <p>AEMO received submissions from AGL and Origin Energy suggesting further amendments to clause 14(5). AEMO does not support the suggested amendments in view of keeping the wording consistent with RMP (VIC). Please refer to Attachment D for the participant feedback.</p>
<p>10. Authorisation review:</p> <ul style="list-style-type: none"> ▪ does this Procedure change impact the ACCC authorisation? 	<p>The Australian Competition and Consumer Commission (ACCC) granted Authorisations to REMCo to operate Chapter 5 (Allocation, Reconciliation and Swing) and Chapter 6 (Compliance and Interpretation) of the RMPs and associated ancillary deeds. The ACCC approved variations to the Authorisations to enable REMCo to transfer administration to AEMO.</p> <p>Authorisation is a process where the ACCC may grant protection from legal action for anti-competitive conduct that might otherwise breach the Competition and Consumer Act 2010 (the CCA) where there is an offsetting public benefit from the conduct.</p> <p>Changes to the RMP Chapters and ancillary deeds covered by the Authorisations must be assessed to determine whether the change impacts the Authorisation.</p> <p>Because clauses 378 to 387 inclusive are provisions that are not part of Chapters 5 or 6 of the RMPs or ancillary deeds covered by the Authorisations, a review of the ACCC Authorisations is not required.</p>
<p>11. Should the proposed Procedure change be made, (with or without amendments)?</p>	<p>AEMO recommends that the proposed procedure changes as described in this IIR should be made without suggested amendments.</p>
<p>12. If applicable, a proposed effective date for the proposed Procedure change(s) to take effect and justification for that timeline.</p>	<p>The proposed procedure changes are to be published in a new version 5.0 of the RMP that is targeted for an effective date of late March 2018.</p>

ATTACHMENT A – DOCUMENTATION CHANGES (SEE SECTION 3)

Retail Market Procedures (WA)

All amendments to the Procedure are change marked, where underlining (blue) represents an addition, and **strike (red)** through represents a deletion.

2. Definitions

“address based identifiers” in relation to the address standard specified in the AEMO Specification Pack, the attributes that make up the address based identifiers are street type, street suffix, flat or unit type, floor or level type and postal delivery type.

14 Other instruments

- (1) Each person required to comply with these *procedures*, must also comply with the following documents (as applicable):
 - (a) the *AEMO Specification Pack*, but not the portions of the *AEMO Specification Pack* that apply only in South Australia; and
 - (b) *FRC Hub Operational Terms and Conditions*.
- (2) For the avoidance of doubt, **Error! Reference source not found.** and the *procedure* change process under these *procedures* do apply to any amendment made to the documents listed in clause 2(1)(a), but not to the document listed in 14(1)(b) or to the portions of the *AEMO Specification Pack* that apply only in South Australia.
- (3) In the event of any inconsistency between the provisions of these *procedures* and either of the documents listed in clause 2(1), the inconsistency is to be resolved by giving precedence to these *procedures* and then each of the other documents shall be read in the order of precedence as listed in clause 2(1).
- (4) *AEMO* must publish the *AEMO Specification Pack* and the *FRC Hub Operational Terms and Conditions*, as amended from time to time.
- (5) If a User or Network Operator or AEMO becomes aware of an addition to the aseXML Schema enumerated address based identifiers, as soon as practicable after becoming aware of the change the relevant User or Network Operator or AEMO must:
 - (a) Ensure that this new address based identifier is added to the aseXML Schema enumerated address based identifiers using the rapid change process as set out in the ASWG Change Management Process as published on the AEMO website; and



- (b) Where there has been an update to the aseXML Schema enumerated *address based identifiers*, provide a notice via the *FRC Hub* broadcast email distribution list that an addition to the list has been implemented; and
- (c) Where a *User or Network Operator or AEMO* has received a notice as set out in clause 14(5)(b), *AEMO*, all *Users* and *Network Operators* must use reasonable endeavours to implement the updated enumerations file within 10 *business days* but no later than 35 *business days*.

ATTACHMENT B – DOCUMENTATION CHANGES (SEE SECTION 3)

FRC B2B System Interface Definition

Appendix A. Data Dictionary

CSV Data Elements

CSV Element Name	Element Name	Description	Attributes /Format	Logical Length/Decimal Length	Allowed Values
Flat_Or_Unit_Type	Flat Or Unit Type (Address Elements)	Defines the type of flat or unit as per Australian Standard AS4590	String	4	<p>For SA See aseXML data element address</p> <p>For WA "APT", "CTGE", "DUP", "FY", "F", "HSE", "KSK", "MSNT", "MB", "OFF", "PTHS", "RM", "SHED", "SHOP", "SITE", "SL", "STU", "SE", "TNHS", "U", "VLLA", "WARD", "WE"</p>
Floor_Or_Level_Type	Floor Or Level Type (Address Elements)	Defines the floor or level type as per Australian Standard AS4590	String	2	<p>For SA See aseXML data element address</p> <p>For WA "B", "FL", "G", "L", "LG", "M", "UG"</p>
Street_Suffix_1	Street Suffix (Address Elements)	Defines the street suffix as per Australian Standard AS4590	String	2	<p>For SA See aseXML data element address</p> <p>For WA "CN", "E", "EX", "LR", "N", "NE", "NW", "S", "SE", "SW", "UP", "W"</p> <p>Note: Street_Suffix_2 is not used in WA.</p>
Street_Suffix_2					
Street_Type_1	Street Type (Address Elements)	Defines the street type as per Australian Standard AS4590	String	4	<p>See aseXML data element address.</p> <p>Note: Street_Type_2 is not used in WA.</p>
Street_Type_2					

Appendix A. Data Dictionary

aseXML Data Elements¹

aseXML Element Name	Element Name	Description	Attributes /Format	Length/Decimal Places	Allowed Values
Address	Address	Supply Point address in aseXML structured format. The allowed values and formats for address elements are contained within the aseXML Schema (in 'Enumerations.xsd' and 'ClientInformation.xsd').			<p>For WA, details about what address attributes to apply, please refer to the WA list of address attributes spreadsheet published on AEMO website</p>
AdjustmentReasonCode	Adjustment Reason Code	A code that the Network Operator provides to the	String	Enum	"Under Read"

ATTACHMENT C – DOCUMENTATION CHANGES (SEE SECTION 3)

WA List of Address Attributes

The attached spreadsheet is version 1.0 of the WA list of address attributes that will take effect once the RMP changes are approved. The spreadsheet shows comparison between Enumerations V 6.0 and schema R13 currently used by WA LVI. It shows the attributes that need to be added to schema R13.



WA address
attributes version 1



ATTACHMENT D – Consolidated List of Participant Feedback to Procedure Change Request

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT RED STRIKEOUT MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
AGL	Att A, 14(5)	Grammar / Context AGL believes that the trigger is a need to add an enumeration.	<u>(5) If a User or Network Operator or AEMO becomes aware of an addition needed to the aseXML Schema enumerated address based identifiers, as soon as practicable after becoming aware of the change the relevant User or Network Operator or AEMO must:</u>	AEMO does not support AGL's proposed change in view of keeping the wording of the new subclause 14(5) consistent with subclause 1.2.2(b) of RMP (VIC).
AGL	14(5)(a)	AGL believes that the obligation is not for the identifying participant to add the enumeration, but rather to advise to the ASWG to investigate and add the enumeration if warranted using the rapid change process.	<u>(a) ensure that this new address based identifier is advised to the ASWG for inclusion through</u> added to the aseXML Schema enumerated address based identifiers using the rapid change process as set out in the ASWG Change Management Process as published on the AEMO website: and	AEMO does not support AGL's proposed change in view of keeping the wording of the new subclause 14(5) consistent with subclause 1.2.2(b) of RMP (VIC).
AGL	14(5)(b)	AGL Notes that while there is an obligation to publish a notice of	<u>(b) where there has been an update to the aseXML</u>	AEMO does not support AGL's proposed change in view of keeping the wording of the new

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT RED STRIKEOUT MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
		change for the schema enumerated list, its not clear in the rules that there is an obligation to publish the enumerated list on the AEMO website (in these Retail Rules).	<u>Schema enumerated address based identifiers.</u> (i) <u>Publish the amended enumeration list on its website; and</u> (ii) <u>provide a notice via the FRC Hub broadcast email distribution list that an addition to the list has been implemented together with its web address.</u>	subclause 14(5) consistent with subclause 1.2.2(b) of RMP (VIC).
Origin Energy	General Comment	Origin Energy's preferred option is option 1 as this creates a uniform position across jurisdictions.	N/A	AEMO acknowledges Origin Energy's comment and wishes to advise that the solution option chosen to progress with addresses compliance issues in WA.
Origin Energy	14(5)(a)	When the User, Network Operator or AEMO become aware of an addition	(a) Ensure that this new address based identifier is	AEMO does not support Origin Energy's proposed change in view of keeping the wording of

STAKEHOLDER	CLAUSE/SECTION REF.	ISSUE/COMMENT	PROPOSED TEXT RED STRIKEOUT MEANS DELETE AND <u>BLUE UNDERLINE</u> MEANS INSERT	AEMO RESPONSE
		to the aseXML Schema enumerated address based identifiers they should advise the ASWG chair. The ASWG through their working group will then make the decision.	added to the ASWG is <u>advised of an addition to the aseXML Schema enumerated address based identifiers for inclusion in the rapid change process as set out in the ASWG Change Management Process as published on the AEMO website: and</u>	the new subclause 14(5) consistent with subclause 1.2.2(b) of RMP (VIC).