

28 June 2019



Ms Nicola Cusworth  
Economic Regulation Authority  
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PERTH BC WA 6849

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Brisbane QLD 4122  
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Dear Ms Cusworth

## **Approval of amendment to the Retail Market Scheme – Procedure Changes IN004/18W and IN004/19W.**

Under section 11ZOL of the *Energy Coordination Act 1994* (the “Act”), the members of an approved Retail Market Scheme may prepare an amendment to their Retail Market Scheme (the “Scheme”) and submit the amendment to the Economic Regulation Authority (“ERA”) for approval.

The framework for the ERA to review and approve amendments to the Scheme is provided in section 11ZOM of the Act. The Scheme is defined to include, amongst other things, the Australian Energy Market Operator (“AEMO”), Retail Market Procedures Western Australia (“RMP WA”), AEMO Specification Pack and FRC Hub Operational Terms and Conditions. As the formal entity for the Scheme, AEMO is applying to the ERA on behalf of the members for two amendments to the Scheme as described in **Attachments A**.

### **Background**

The RMP WA set out the procedure change process that AEMO must follow before submitting changes to the ERA. AEMO has applied this process, which assisted AEMO and relevant stakeholders in developing the two amendments (IN004/19W and IN004/18W) proposed in this application. These amendments were finalised by AEMO on behalf of stakeholders when it published the final Impact and Implementation Reports (“IIRs”) for each amendment on its website on 10 May 2019.

The consultation that underpins the procedure change process determined that the amendments for IN004/19W were “non-material”, since the proposed amendments:

- (i) will have no impact on the information technology systems; or
- (ii) involve only minor changes to the Western Australian Gas Retail Market Agreement (“WAGRMA”).

Similarly, the amendments for IN004/18W were also considered “non-substantial” given the proposed amendments:

- (i) will have only a minor impact on the information technology systems of AEMO and the Network Operator; or
- (ii) do not materially alter consumer protection mechanisms under the RMP WA (introduction of negative assurance will ensure there is adequate consumer protection); or
- (iii) do not have a material commercial impact on AEMO, participants, pipeline operators or prescribed persons.

As per clause 383(1) of the RMP WA, each participant, pipeline operator, prescribed person and interested person was invited to submit written comments to the proposed amendments for

IN004/18W and IN004/19W. Submissions closed on 7 June 2019, with all submissions supporting the proposed changes.

AEMO has decided to submit the two amendments to the ERA for approval as endorsed procedure changes. Please refer to **Attachments D and E** for the two IIRs.

### **Amendments to the Scheme for ERA consideration**

**Attachment A** contains a summary of each amendment and includes a description on what artefact under the Scheme is changing; the actual change (in “track change” mode); and any additional relevant information that is not covered in the IIR.

Section 11ZOO (1) and (2) of the Act specifies the criteria that the ERA is to consider in determining whether to approve an amendment to the Scheme. Please refer to Attachment B for the rationale for the proposals’ meeting rule change requirements under the Act. AEMO believes that no further amendments are required based on participant feedback to the IIRs as described in Attachment C. Further, AEMO believes that the details contained in this application satisfy the criteria under Section 11ZOO and which will enable the ERA to consider the amendments.

In accordance with clause 383(4) of the RMP WA, AEMO must provide information to stakeholders about how to make submissions to the ERA on endorsed procedure changes, including a closing date for any ERA submissions. Steven Kane from the ERA has provided AEMO with this information, which includes advice that submissions to the ERA will close on 9 August 2019.

Upon sending this application, AEMO will publish this material on its website and include information on how to make submissions to the ERA.

Should the ERA approve the two endorsed procedure changes, AEMO proposes to implement the changes related to IN004/18W and IN004/19W to take effect on 20 September 2019. AEMO requests that ERA consider, endorse, and publish the approval for these changes in the *Gazette* by 23 August 2019 which will enable AEMO to implement the system changes and publish the amended WAGRMA, RMP WA and artefacts of the Specification Pack by the effective date of 20 September 2019.

If you require any further information or if have any questions in relation to this application, please contact Nandu Datar on 03 9609 8851.

Yours sincerely



Mr Peter Geers  
**Chief Strategy and Markets Officer**

## ATTACHMENT A – Summary of Amendments

### IN004/18W – Complete MIRN Listing

1. This proposed change involves Implementing the Complete MIRN Listing feature for the WA gas retail market.
2. The Scheme documents requiring amendment are the RMP WA and FRC B2B System Interface Definition.
3. Following are extracts from the RMP WA and FRC B2B System Interface Definition showing the changes in “track change” mode with ~~red-strikeout~~ meaning “delete” and blue underline meaning “insert” and Grey highlight represents additional changes to the original proposal.

Retail Market Procedures (WA) changes are:

#### 74A ~~There is no clause 74A~~ Complete MIRN Listing

- (a) Each network operator must use its best endeavours to update, format and deliver a new complete MIRN listing in accordance with the AEMO Specification Pack which is to be made available to AEMO by 5pm on the fifth business day after the end of the calendar month or as otherwise agreed from time to time by all relevant parties.
- (b) AEMO must make each complete MIRN listing available to all users after it is received from the network operator.
- (c) The user must ensure that the complete MIRN listing is accessed and used solely to confirm the relevant discovery address/MIRN details of the customer.
- (d) The user must ensure that the customer has provided explicit informed consent to access and use the complete MIRN listing to confirm the relevant discovery address/MIRN details of the customer in relation to the delivery point.

## Part 7.2– Audit

### 350 Audit of explicit informed consent

- (1) There is no Clause 350(1).
- (2) For each calendar year, a user must appoint an auditor, having regard to clause 353, to undertake a *negative assurance audit* of the user’s compliance during the year with clauses 55A, 72(1), 72(4), 74A, 79(1), 79(4), 166A and 349.

## Appendix 6– Requirements for explicit informed consent

### Requirements for explicit informed consent

A customer’s consent will be *explicit informed consent* if the consent is given:

- (a) expressly; and
- (b) orally or in writing; and
- (c) after the *user* has in plain language appropriate to that *customer* disclosed all matters materially relevant to the giving of the consent, including each specific purpose for which the consent will be used; and
- (d) by a person competent or authorised to give it on the *customer's* behalf.

**Records of explicit informed consent**

A *user* must:

- (e) create a record of each *explicit informed consent* received.
- (f) *maintain* the record for a period of at least 2 years from the date of the *explicit informed consent*.
- (g) provide a copy of the record to *AEMO* within 10 *business days* after *AEMO* requests it.

A record under clause (e) must:

- (h) be in a form capable of examination by *AEMO* under clause 75 and of audit under clause 350;
- (i) include such information as enables *AEMO* or the auditor to verify the *user's* compliance with clauses 55A, 72(1), 72(4), [74A](#), 79(1), 79(4), 166A and 349 and this Appendix 6.

*FRC B2B System Interface Definition changes are:*

**Appendix E Non Automated Electronic Files**

**Overview**

The following sections specify the format of those B2B 'electronic file' transactions (not aseXML) which use CSV components. The CSV component will be incorporated into a file, compressed and then communicated via an e-mail or on a disk.

The CSV file name shall be constructed as described in the CSV File Format Specification Document. If the CSV file is attached to an e-mail, the subject line must be constructed as defined in CSV File Format Specification Document. The transaction name must be taken from the table below.

This document covers CSV details for the following transactions.

Transaction number	Transaction Type Description	CSV File Name / e-Mail Subject Component Name
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45	Energy History Request	ENERGYHISTORYREQUEST
45A	Bulk Basic-Metered Energy History Request	BULKBASICHISTORYREQUEST
46	Energy History Response	ENERGYHISTORYRESPONSE
	Interval Meter Energy History Response	INTERVALHISTORYRESPONSE
71	Amend Customer Details	AMENDCUSTOMERDETAILS
74	Annual Meter Reading Schedule	METERREADINGSCHEDULE
75	Meter Reading Route Change	READINGROUTECHANGE
136	Time Expired Meters Notification	TIMEEXPIREDMETERS
289	Standing Data Change From DB	STANDINGDATACHANGE
298	Refresh of New Street Listing for MIRN Discovery	NEWSTREETLISTING
<a href="#">299</a>	<a href="#">Complete MIRN Listing</a>	<a href="#">distributor_ccyymmddhhmiss.zip</a>
330	Notification of Planned Outage	SERVICERENEWAL
333	Meter Range Updates	METERRANGEUPDATE
	Interval Meter Data	INTERVALMETERDATA

### [Complete MIRN Listing \(T299\) \(For WA\)](#)

[The Network Operator must make available to Users a listing of all distribution metering supply points that have a MIRN assigned and a MIRN status of either Registered \(up stand installed\), Commissioned \(meter installed\) or Decommissioned \(meter removed installed but delivery point is disconnected\). The Network Operator must ensure that all data fields as per Transaction 299 that are available in their database are transferred to the Complete MIRN listing irrespective of whether the data field is designated as O \(optional\) in the table for T299.](#)

[The Network Operator must ensure that the Complete MIRN Listing file is encrypted and compressed \(see section 4.4 for allowable compression formats\) in a way that when the User retrieves the file it can be decrypted and uncompressed using the “WinZip” utility.](#)

[The Network Operator will utilise the CSV fields and formats consistent with the fields and formats that are used in the aseXML schema applicable for a MIRN Discovery Response which is defined in FRC B2B Systems Interface Definitions, section 4.3.2.3 \(NMIDiscoveryResponse\).](#)

[The Complete MIRN Listing is to be refreshed after the end of the calendar month by the Network Operator and the Network Operator must FTP the refreshed files to their existing designated folder on GRMS. AEMO will transfer the Complete MIRN Listing to the existing designated folder for each User on GRMS.](#)

[The following file naming convention is to be used:](#)

[\\_distributor\\_ccyymmddhhmiss.zip](#)

[Note: Reference to “Network Operator” and “User” refer to the Hub participant ID.](#)

<u>Transaction 299</u>		
<u>Heading/Column designator</u>	<u>Mandatory/Optional</u>	<u>Comment</u>
<u>MIRN</u>	<u>M</u>	<u>Must be present</u>
<u>MIRNChecksum</u>	<u>M</u>	<u>Must be present</u>
<u>FlatOrUnitType</u>	<u>O</u>	
<u>FlatOrUnitNumber</u>	<u>O</u>	
<u>FloorOrLevelType</u>	<u>O</u>	
<u>FloorOrLevelNumber</u>	<u>O</u>	
<u>BuildingOrPropertyName1</u>	<u>O</u>	
<u>BuildingOrPropertyName2</u>	<u>O</u>	
<u>LocationDescriptor</u>	<u>O</u>	
<u>HouseNumber1</u>	<u>O</u>	
<u>HouseNumber2</u>	<u>O</u>	
<u>HouseNumberSuffix1</u>	<u>O</u>	
<u>HouseNumberSuffix2</u>	<u>O</u>	
<u>LotNumber</u>	<u>O</u>	
<u>StreetName1</u>	<u>O</u>	
<u>StreetName2</u>	<u>O</u>	
<u>StreetType1</u>	<u>O</u>	
<u>StreetType2</u>	<u>O</u>	
<u>StreetSuffix1</u>	<u>O</u>	
<u>StreetSuffix2</u>	<u>O</u>	
<u>PostalDeliveryType</u>	<u>O</u>	
<u>PostalDeliveryNumberPrefix</u>	<u>O</u>	
<u>PostalDeliveryNumberValue</u>	<u>O</u>	
<u>PostalDeliveryNumberSuffix</u>	<u>O</u>	
<u>SiteAddressCity</u>	<u>O</u>	
<u>SiteAddressState</u>	<u>O</u>	
<u>SiteAddressPostcode</u>	<u>O</u>	
<u>SiteAddressDPID</u>	<u>O</u>	
<u>GasMeterNumber</u>	<u>O</u>	
<u>Address1</u>	<u>O</u>	
<u>Address2</u>	<u>O</u>	
<u>Address3</u>	<u>O</u>	

Refer Appendix A Data Dictionary – CSV Data Elements for the description of the address elements from the table above

Password exchange process

The Complete MIRN Listing password exchange process is as follows:

- User to nominate an email address to send password. These details are sent to Network Operators;
- Password to change each 90 days; and
- Network Operators to email password details to user prior to it being used.

4. Additional information to submit with this application.

The previous Decision Paper related to this proposed change (section 1.2.4.2, Page 12) indicated using AEMO's Market Information Bulletin Board (MIBB) in the solution. The MIBB solution was specified during the previous Procedure Change Request (PCR) consultation. Subsequent evaluation of the proposed solutions identified the Filemover facility on Gas Retail Market System (GRMS) as a better solution than MIBB. This solution was included in the previous IIR consultation. This was also highlighted in the consolidated list of participant feedback (Attachment C) to the previous IIR.

#### **IN004/19W – WAGRMA Minor Amendments**

1. This proposed change involves amending clauses 1.1, 5.4, 5.5 and 11 of WAGRMA that removed the requirement for the ERA to approve membership of the Scheme.
2. The Scheme document that requires the amendment is the WAGRMA.
3. Following is an extract from the WAGRMA showing the changes in "track change" mode with ~~red-strikeout~~ meaning "delete" and blue underline meaning "insert"

#### **1 Interpretation**

- 1.1 In this Agreement, unless the context requires otherwise, the following expressions have the following meanings:

**Admission Note** has the meaning given to it in clause ~~5.4~~ 5.2 of this Agreement.

#### **5. New Participants**

- 5.1 A person that is not a Party to this Agreement may apply to AEMO to become a Party to this Agreement (New Participant) if it is eligible to do so. A New Participant will be eligible only if the person:

- (a) is a WA Gas Retail Market Participant who is lawfully entitled to carry on that business;
- (b) honestly and accurately provides to AEMO the information required under clause 5.2;
- (c) is not being wound up in accordance with the Corporations Act 2001 (Cth);
- (d) is not immune from liabilities incurred under this Agreement or as a Scheme Participant;
- (e) is capable of being sued in its own name in a court of competent jurisdiction; and
- (f) agrees in writing to become bound by the terms and conditions of this Agreement.

**(Eligible)**

- 5.2 An application by a New Participant under clause 5.1 must be in the form of an admission note as annexed in the Annexure and must:
- (a) specify the name and ABN (if applicable) of the New Participant;
  - (b) specify whether the New Participant is a Gas Distribution Operator, a Retail Gas Operator or a Self-Contracting User;
  - (c) state that the New Participant is applying to become a Party to this Agreement; and
  - (d) be signed by an authorised officer of the New Participant.

**(Admission Note).**

- 5.3 An Admission Note is an offer from the New Participant to the Parties (being AEMO and each WA Gas Retail Market Participant who was initially a Party to this Agreement and each WA Gas Retail Market Participant subsequently joining this Agreement under this clause 5) to amend this Agreement to add the New Participant as one of the Parties.
- 5.4 AEMO must accept an Admission ~~Notice~~[Note](#) if the New Participant is Eligible. If AEMO is not satisfied a New Participant is Eligible (acting reasonably), it may reject or defer consideration of an Admission Note [and must provide written notice to this effect to the New Participant within a reasonable period of time, including any reasons for its decision to reject or defer the New Participant's Admission Note.](#)
- 5.5 If a New Participant provides AEMO with an Admission Note, and AEMO provides written confirmation to the New Participant ~~before 5:00 PM on the 10th Business Day after the notice is given (Deadline)~~ that the Admission Note has been accepted, then the Parties are deemed by this clause 5.5 to have agreed irrevocably to the offer referred to in clause 5.3, and, ~~subject to approval of the ERA,~~ this Agreement is amended from the ~~Deadline or such~~ date as ~~approved by the ERA~~[specified in AEMO's written confirmation](#) to add the New Participant as one of the Parties.

**11. Amendments**

This Agreement may only be varied by agreement in writing between the Parties and, [if required by the ECA,](#) with the approval of the ERA under section 11ZOM of the ECA.

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[\[Note: The ERA is not required to approve the addition of a new Party to this Agreement under clause 5\]](#)

4. Additional information to submit with this application.  
AGL in their submission to the PCR and IIR have requested that following approval by the ERA, the changes in this proposal become effective from when the WAGRMA came into effect.



**ATTACHMENT B – Rationale for Proposals IN004/18W and IN004/19W  
meeting the requirement for RMP changes under the Act**

**IN004/18W**

Section	Requirement	AEMO Comment
11ZOO(1)	The Authority may approve an amendment to the Scheme if it is satisfied that:	
	(a) if the amendment is made, the provisions of the Scheme:	
	(i) will comply with the Act; and	The Scheme, in its initial form, was approved by the Minister for Energy; and all amendments to the Scheme since its initial approval have been approved by the Authority, in accordance with the Act. As a result, the Scheme, in its current form, clearly complies with the Act.  AEMO is of the view that the Rules will continue to comply with the Act if the procedure change proposal IN004/18W is approved, as it will promote competition in the WA retail gas market by lowering network costs, reducing MIRN discovery time, and enabling easier customer churn. Introduction of negative assurance will also ensure there is adequate consumer protection.
	(ii) be suitable for the purposes of section 11ZOB;	Section 11ZOB indicates that the purpose of the Scheme is to ensure that the retail gas market is regulated and is operated in a manner that is: (a) open and competitive; (b) efficient; and (c) fair to gas market participants and their customers.  Procedure change proposal IN004/18W proposes implementing the Complete MIRN Listing feature, which will promote competition in the WA gas retail market by lowering network costs, reducing MIRN discovery time, and enabling easier customer churn. Introduction of negative assurance will also ensure there is adequate consumer protection.  It will not materially impact on the Scheme or its suitability for the purposes of section 11ZOB of the Act.
(b) any other principle, criterion, or requirement that is prescribed for the purposes of this paragraph has been met.	AEMO is not aware of any regulations under section 11ZOO(b), so this section of the Act is not applicable.	
11ZOO(2)	The Authority may approve an amendment to the Scheme under section 11ZOM only if it is satisfied	The proposed amendment to the Scheme has been consulted in accordance with Procedure change process of the RMP WA.

Section	Requirement	AEMO Comment
	<p>that the consultation required by section 11ZOL(3) has taken place and:</p> <p>(a) each person required to be consulted has agreed to the amendment; or</p> <p>(b) if any person required to be consulted has not so agreed, that person has been given a reasonable opportunity in the course of consultation to provide reasons for not agreeing, and any reasons so provided have been considered.</p>	<p>AEMO commenced consultation for IN004/18W by publishing the Procedure Change Request (PCR) and inviting registered participants and interested stakeholders to make submissions. AEMO received submissions from the Retailers and the Network Operator. AEMO has addressed all feedback received to the satisfaction of participants making submissions. This was proven by the submissions received to the IIR, which indicated unanimous support of the proposal and requested no further changes.</p> <p>As a result, AEMO submits that it has met all of the consultation requirements for the amendments proposed in IN004/18W and that each person required to be consulted with has agreed to the amendment.</p>

## IN004/19W

Section	Requirement	AEMO Comment
11ZOO(1)	The Authority may approve an amendment to the Scheme if it is satisfied that:	
	(a) if the amendment is made, the provisions of the Scheme:	
	(i) will comply with the Act; and	<p>The Scheme, in its initial form, was approved by the Minister for Energy; and all amendments to the Scheme since its initial approval have been approved by the Authority, in accordance with the Act. As a result, the Scheme, in its current form, clearly complies with the Act.</p> <p>AEMO is of the view that the Rules will continue to comply with the Act if the procedure change proposal IN004/19W is approved: the proposal will only remove the requirement for the ERA to approve membership of the Scheme, and the <i>Energy Coordination Act 1994</i> does not require the ERA to approve membership of the Scheme.</p>
	(ii) be suitable for the purposes of section 11ZOB;	<p>Section 11ZOB indicates that the purpose of the Scheme is to ensure that the retail gas market is regulated and is operated in a manner that is:</p> <ul style="list-style-type: none"> <li>(d) open and competitive;</li> <li>(e) efficient; and</li> <li>(f) fair to gas market participants and their customers.</li> </ul> <p>Procedure change proposal IN004/19W proposes removing the requirement for the ERA to approve membership of the Scheme, which will result in a more efficient and streamlined process for new participants entering the WA retail gas market and hence continue to promote competition.</p> <p>It will not materially impact on the Scheme or its suitability for the purposes of section 11ZOB of the Act.</p>
	(b) any other principle, criterion, or requirement that is prescribed for the purposes of this paragraph has been met.	AEMO is not aware of any regulations under section 11ZOO(b), so this section of the Act is not applicable.
11ZOO(2)	<p>The Authority may approve an amendment to the Scheme under section 11ZOM only if it is satisfied that the consultation required by section 11ZOL(3) has taken place and:</p> <ul style="list-style-type: none"> <li>(a) each person required to be consulted has agreed to the amendment; or</li> <li>(b) if any person required to be consulted has not so agreed, that person has been given a</li> </ul>	<p>The proposed amendment to the Scheme has been consulted in accordance with Procedure change process of the RMP WA.</p> <p>AEMO commenced consultation for IN004/19W by publishing the Procedure Change Request (PCR) and inviting registered participants and interested stakeholders to make submissions. AEMO received submissions from the Retailers and the Network Operator. AEMO has addressed all feedback received to the satisfaction of participants making submissions. This was proven by the submissions</p>

Section	Requirement	AEMO Comment
	<p>reasonable opportunity in the course of consultation to provide reasons for not agreeing, and any reasons so provided have been considered.</p>	<p>received to the IIR, which indicated unanimous support of the proposal requiring no further changes.</p> <p>AEMO also engaged with a self-contracting user to ensure they understood and supported the proposed changes. Please refer to <b>Attachment F</b> for the confirmation email.</p> <p>As a result, AEMO submits that it has met all of the consultation requirements for the amendments proposed in IN004/19W and that each person required to be consulted with has agreed to the amendment.</p>

**ATTACHMENT C – SUBMISSIONS RECEIVED RELATING TO THE IIR FOR IN004/18W and IN004/19W**

**SUBMISSION relating to the IIR IN004/18W – Complete MIRN Listing**

**General Comments on the IIR**

Sections 1 to 4 of the IIR sets out AEMO's critical examination of the proposal. Does your organisation support AEMO's examination of the proposal?

	Date	Participant	Issue / Comment	Proposed Text	AEMO Comment
1	29 May 2019	AGL	AGL supports AEMO's examination of the proposal as set out in sections 1 to 4 of the IRR and has nothing further to add.		AEMO acknowledges AGL's support.
2	23 May 2019	Origin Energy	Origin Energy support AEMO's critical examination of the proposal.		AEMO acknowledges Origin Energy's support
3	5 Jun 2019	Alinta Energy	Alinta Energy supports AEMO's critical examination of the proposal outlined in the Impact Implementation Report (IIR) <i>Complete MIRN Listing – Version 2</i> and believes the concerns raised by the ERA regarding customer protection mechanisms have been addressed in this Version 2.		AEMO acknowledges Alinta Energy's support

Sections 5 to 10 of the IIR sets out AEMO's assessment of likely effect of proposal. Does your organisation support AEMO's assessment of likely effect of proposal.?

	Date	Participant	Issue / Comment	Proposed Text	AEMO Comment
4	29 May 2019	AGL	AGL supports AEMO's assessment of the likely effect of the proposal set out in		AEMO acknowledges AGL's support.

**SUBMISSION relating to the IIR IN004/18W – Complete MIRN Listing**

			sections 5 to 10 of the IIR and has nothing further to add.		
5	23 May 2019	Origin Energy	Origin Energy support AEMO's assessment of likely effect of proposal.		AEMO acknowledges Origin Energy's support
6	5 Jun 2019	Alinta Energy	Alinta Energy agrees with AEMO's assessment of the likely effect of the proposal and considers the proposed amendments will ensure the WA retail gas market remains open, competitive and fair to all market participants and their customers.		AEMO acknowledges Alinta Energy's support

**Section 11 of the IIR set out AEMO's recommendation. Does your organisation support AEMO position to recommend the procedures changes?**

	Date	Participant	Issue / Comment	Proposed Text	AEMO Comment
7	29 May 2019	AGL	AGL supports AEMO's recommendation to the ERA of the changes to the procedures as set out in sections 11 and 12 of the IIR and has nothing further to add.		AEMO acknowledges AGL's support.
8	23 May 2019	Origin Energy	Origin Energy support AEMO's recommendation.		AEMO acknowledges Origin Energy's support
9	5 Jun 2019	Alinta Energy	Alinta Energy agrees with AEMO's recommendations and supports the amendments: <ul style="list-style-type: none"> <li>To the <i>Retail Market Procedures (WA)</i> as outlined in Attachment A of the IIR and</li> <li>To the <i>FRC B2B System Interface Definition</i> as outlined in Attachment B of the IIR.</li> </ul>		AEMO acknowledges Alinta Energy's support

**SUBMISSION relating to the IIR IN004/18W – Complete MIRN Listing**

**Specific comments regarding RMPs and GIP/SP**

<b>#</b>	<b>Date</b>	<b>Participant</b>	<b>Issue / Comment</b>	<b>Proposed Text</b>	<b>AEMO Comment</b>

**SUBMISSION relating to the IIR IN004/19W – WAGRMA Minor Amendments****General Comments on the IIR****Sections 1 to 4 of the IIR sets out AEMO's critical examination of the proposal. Does your organisation support AEMO's examination of the proposal?**

	<b>Date</b>	<b>Participant</b>	<b>Issue / Comment</b>	<b>Proposed Text</b>	<b>AEMO Comment</b>
1	23 May 2019	Origin Energy	Origin Energy support AEMO's critical examination of the proposal.		AEMO acknowledges Origin Energy's support.
2	29 May 2019	AGL	Yes, AGL supports AEMO's examination of the proposal and has nothing further to add.		AEMO acknowledges AGL's support
3	5 Jun 2019	Alinta Energy	Alinta Energy supports AEMO's critical examination of the proposal outlined in the Impact Implementation Report (IIR) <i>Minor changes to Western Australian Gas Retail Market Agreement (WAGRMA)</i> and agrees with the reasons why the proposed changes are required.		AEMO acknowledges Alinta Energy's support

**Sections 5 to 10 of the IIR sets out AEMO's assessment of likely effect of proposal. Does your organisation support AEMO's assessment of likely effect of proposal.?**

	<b>Date</b>	<b>Participant</b>	<b>Issue / Comment</b>	<b>Proposed Text</b>	<b>AEMO Comment</b>
4	23 May 2019	Origin Energy	Origin Energy support AEMO's assessment of likely effect of proposal.		AEMO acknowledges Origin Energy's support
5	29 May 2019	AGL	Yes, AGL supports AEMO's assessment of the likely effect of the proposal and has nothing further to add.		AEMO acknowledges AGL's support
6	5 Jun 2019	Alinta Energy	Alinta Energy agrees with AEMO's assessment of the likely effect of the proposal and considers removing the requirement for the Economic Regulation Authority (ERA) to approve		AEMO acknowledges Alinta Energy's support



**SUBMISSION relating to the IIR IN004/19W – WAGRMA Minor Amendments**

			scheme membership will be more process and cost efficient.		
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**Section 11 of the IIR set out AEMOs recommendation. Does your organisation support AEMO position to recommend the procedures changes?**

	Date	Participant	Issue / Comment	Proposed Text	AEMO Comment
7	23 May 2019	Origin Energy	Origin Energy support AEMO's recommendation.		AEMO acknowledges Origin Energy's support
8	29 May 2019	AGL	Yes, AGL supports AEMO's position to recommend the procedures changes and seek the ERA's approval. In particular, AGL notes and supports AEMO's response (as set out in the IIR, Appendix B, point 4 to AGL's submission) that when submitting these proposed changes to the WAGRMA to the ERA, AEMO will propose that the changes are effective from when the WAGRMA came into effect.		AEMO acknowledges AGL's support and has included AGL's request in this Application for ERA's consideration.
9	5 Jun 2019	Alinta Energy	Alinta Energy agrees with AEMO's recommendations and supports the amendments proposed in the IIR.		AEMO acknowledges Alinta Energy's support

**Specific comments regarding RMPs and GIP/SP**

#	Date	Participant	Issue / Comment	Proposed Text	AEMO Comment

**ATTACHMENT D – IIR for IN004/18W**

Enclosed with this application.

**ATTACHMENT E – IIR for IN004/19W**

Enclosed with this application.

**ATTACHMENT F – Confirmation email from persons other than Retailers and Network Operators that are impacted by the changes proposed in IN004/19W.**

Enclosed with this application.