

IIR response template for IN002/15W and IN026/15 (New JECs) – Responses to be emailed to grcf@aemo.com.au by 20 October 2020

Review comments submitted by: *Australian Gas Networks*

Date: 20/10/20

Contact Person: *Rick Abbott*

If your organisation **only participates in WA** then complete only sections 1A and 2. Section 3 is optional.

If your organisation **only participates in east-coast jurisdictions** then complete only sections 1B and 2. Section 3 is optional.

If your organisation **participates in both WA and east-coast jurisdictions** complete sections 1A, 1B (*note: if your assessment of the IIR is the same for 1A and 1B then write "as above" in section 1B*) and 2. Section 3 is optional.

Section 1A - General Comments on the Impact and Implementation Report **for WA** (IN002/15W).

Topic	Please Provide Response Here
<p>Sections 1 to 9 of the IIR sets out details of the proposal.</p> <p><u>In respect of the changes proposed for WA</u>, does your organisation supports AEMO’s assessment of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO’s assessment (include IIR section reference number) of the proposal and include information that supports your organisation’s rationale for not supporting AEMO’s assessment.</p>	

Section 1B - General Comments on the Impact and Implementation Report for east-coast jurisdictions. (IN026/15)

Topic	Please Provide Response Here
<p>Sections 1 to 9 of the IIR sets out details of the proposal.</p> <p><u>In respect of the changes proposed in east-coast jurisdictions</u>, does your organisation supports AEMO's assessment of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO's assessment (include IIR section reference number) of the proposal and include information that supports your organisation's rationale for not supporting AEMO's assessment.</p>	<p>Yes</p>

Section 1C – Comments on the move to a non-versioned list for JECs (east-coast jurisdictions and WA). (IN002/15W and IN026/15)

Topic	Please Provide Response Here
<p>Section 1.3 of the IIR sets out AEMO’s proposal to move JECs to a non-versioned list in the aseXML schema.</p> <p>Assuming that the changes to JECs are adopted, does your organisation support AEMO’s proposal to move JECs to a non-versioned list?</p> <p>If no, please specify areas in which your organisation disputes AEMO’s assessment (include IIR section reference number) of the proposal and include information that supports your organisation’s rationale for not supporting AEMO’s assessment.</p>	<p>In relation to the JECs moving to a non-versioned enumeration list, whilst we accept the benefits in being more nimble and able to move to include new reason linked JECs to enable expected future new regulatory reporting requirements to be met, we also see some financial risk in this.</p> <p>Implementation costs of new JECs for distributors are very significant, as our cost estimates for the new JECs currently proposed have revealed.</p> <p>We acknowledge that any future new JEC proposals, like any other change proposal, will be subject to a full industry consultation, where the change would only be recommended by AEMO if there was a clear net industry benefit. Any contentious proposals must be subjected to a full industry cost/benefit analysis with input from all participants.</p> <p>However we remain concerned that the non-versioned list could potentially increase the risk that some ‘nice to have’ JECs get up, rather than only those that have broad industry support. New JECs are expensive for distributors to implement, and any future proposals should be carefully considered and potentially limited to those that meet new regulatory requirements, unless there is an obvious benefit to all participants.</p>

Section 2 - Feedback on the documentation changes in the Attachments of the IIR.

Please note which references you should provide comment on given your jurisdiction are shown in gold:

Document	NSW/ACT	QLD	SA	VIC	WA
Ref # 1 - Participant Build Pack 1 Table of Transactions (JEC tab)					
Ref #2 – Gas Interface Protocol - Victoria					
Ref #3 – Gas Interface Protocol - Queensland					
Ref #4 – NSW/ACT specific Participant Build Pack 5					
Ref #5 – Gas Interface Protocol – NSW/ACT					
Ref #6 – B2B Service Order Specifications – Part 2					
Ref #7 – B2B Service Order Specifications - Part 1					
Ref #8 – AEMO Specification Pack - Specification Pack Usage Guidelines					

Participants are to complete the relevant columns below in order to record their response.

Ref # 1 - Participant Build Pack 1 - Table of Transactions, Table of Elements, List of Job Enquiry Codes, Address Elements and MIRN and Meter states.

Row # Column # in spreadsheet	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	Ref# 1A document is missing from Attachment C.		

Ref #2 – Gas Interface Protocol - Victoria

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Ref #3 – Gas Interface Protocol - Queensland

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Ref #4 – NSW/ACT specific Participant Build Pack 5

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	Ref# 4A document missing from Attachment C. The table in Appendix B of the IIR for Ref#4 refers to appendix A of PBP 5 but appendix A is not Data Dictionary it is table of transactions. Unable to find reference to gasEnumerations.xsd file.		

Ref #5 – Gas Interface Protocol – NSW/ACT

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Ref #6 – B2B Service Order Specifications – Part 2

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	In the IIR Attachment B, Ref #6 and Ref# 7 comments have been mixed up. Ref #6 is Part 1 and Ref #7 is part 2.		

	Unable to see marked up change related to child and parent comment for Ref#6 document.		

Ref #7 – B2B Service Order Specifications - Part 1

Row # Column # in spreadsheet	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Ref #8 – AEMO Specification Pack- Specification Pack Usage Guidelines

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	Ref# 9 document missing from Attachment C.		

Section 3¹ – Additional feedback that is not part of this consultation but warrants further investigations / discussions.

Topic	Please Provide Response Here
Does your organisation have any feedback / suggestions that closely relate to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please included your feedback / suggestions.	At the October ASWG meeting, APA asked whether AEMO would provide an impact assessment for all of the schema uplift changes in the new R40 aseXML schema version since R29 and was advised that this would need to be raised in the GRCF. This will be requested at the next GRCF meeting.

¹ Note - This feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process