

PCR Response Template for IN003/19W (Holistic tidy up of WA RMP) consultation

Review comments submitted by: ATCO Gas Australia

Date: 4 February 2020

Contact Person: Joe Sanches

Participants are to complete the relevant columns below in order to record their response.				
Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	Rating ¹ (H/M/L)	AEMO Response (AEMO only)
Clause 2	ATCO agrees with AEMO's proposed definition inclusion	<p>"above 10TJ determination" means a <u>determination made under clause 139 or clause 140 to indicate that the user believes the gas deliveries to a customer at a delivery point will likely exceed 10 TJ in the year immediately following the day of determination.</u></p> <p>"below 10 TJ determination" means a <u>determination made under clause 139 or clause 140 to indicate that the user believes the gas deliveries to a customer at a delivery point will likely not exceed 10 TJ in the year immediately following the day of determination.</u></p>		

¹ L = Low: Not critical. Issues / Comments are minor. They add clarity to the document. No major concern if not included in any further revisions
M = Medium: - Important. Strong case that issue / comments should be consider and an update to the document is desirable, but not critical.
H = High – Critical. The issue / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

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Clause 2	<p>Definition - discovery address</p> <p>Update definition with NSW definition</p> <p>ATCO does not support AEMO's proposed change, the existing definition and accompanying "{clarification notes}" in the RMP provides a clear description of address attributes used in the WA gas market and to assist in ensuring unnecessary misinterpretation in discovery address construction for WA gas market.</p>	<u>Maintain existing definition</u>		
Clause 2	<p>Definition - GBO ID</p> <p>Seems unnecessary for AEMO to issue a GBO ID to itself</p> <p>ATCO does not agree with AEMO's proposal.</p> <p>NO relies on AEMO's identifier ("WAGMO") to enable NO to process WA market transactions. The proposed definition removal would result in the insertion of a new definition that confirms the WA gas market operator is identified as "WAGMO".</p>	<u>Maintain existing definition</u>		
Clause 2	<p>Definition – meter</p> <p>ATCO does not support the proposed change in its current wording as it is not consistent with ATCO's</p>	<p><u>Maintain existing definition</u></p> <p>"meter"<u>-means a meter used to measure the amount of gas supplied to a delivery point and includes any associated regulators, pipes, fittings.</u></p>		

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	approved Access Arrangements and WA Gas Standards Regulations.	<u>components, equipment or instruments.</u> {Note: These meters are sometimes referred to as “master meters” or “custody transfer meters”, and are not “submeters”}. means a device used to directly measure the mass or volume of gas passing through it and includes the associated equipment attached to the device to filter, control or regulate that flow of gas.		
Clause 2	Definition - meter number ATCO does not support the proposed change – the existing definition is clear in describing that a meter number in Western Australia must be alpha-numeric as assigned by NO.	<u>Maintain existing definition</u> “meter number” means <u>the unique alphanumeric identifier assigned to a meter by the network operator or meter manufacturer.</u> a unique identification number allocated to a meter.		
Clause 2	Definition - street / suburb combination Align to common definition ATCO does not support AEMO’s proposal – refer comment at ‘discovery address’ proposal	<u>Maintain existing definition</u>		
Clause 2	"unaccounted for gas" is never defined	<u>"unaccounted for gas" is the difference between the amount of gas injected into the sub-network</u>		

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	ATCO queries AEMO's interpretation an proposed change and refers AEMO to ATCO's approved Access Arrangements for a discussion on the components of UAFG – proposed definition attached.	<u>at all physical gate points and the amount of gas withdrawn from the sub-network at all delivery points, including but not limited to leakage or other actual losses such as third party damage to pipes, discrepancies due to metering inaccuracies and variations of temperature, pressure and other parameters.</u>		
Clause 73	<p>AEMO: AEMO does not believe that the RMP (WA) obligate AEMO to review MIRN discovery requests; as such, AEMO's proposed change does not alter AEMO's obligations under the RMP. Further, given the annual EIC audit and the fact that AEMO is entitled to inspect EIC records under clause 73(4), AEMO believes that it has adequate capacity to monitor any issues that may emerge.</p> <p>ATCO Response:</p>	<u>Maintain existing clause</u>		

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	<p>ATCO does not agree with AEMO’s determination to remove cl 73.</p> <p>ATCO maintains that AEMO as independent market operator should be responsible to deliver upon a regular review of Western Australia MIRN discovery requests as previously noted.</p> <p>The GMI which planned to introduce the Complete MIRN Listing in January 2019 to assist retailers with the timely completion of customer transfers based on discovery addresses and which was eventually implemented in October 2019 following ERA approval, is meant to advise the market operator on the quality of retailers’ submitted MIRN discovery requests (not just EIC).</p> <p>It is ATCO’s understanding that retailers are not effectively using the complete MIRN listing as intended and we assert that the market operator should always provide oversight on MIRN discoveries to help uphold timely customer transfers without additional oversight by ATCO as NO</p>			

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		<p>73. AEMO to review MIRN discovery requests and explicit information</p> <p>(1) There is no clause 73(1).</p> <p>(2) Each <i>network operator</i> must, at least once a month, provide AEMO with a report of all <i>MIRN discovery requests</i> it received in the period since its last report under this clause 73(1).</p> <p>(3) The report under clause 73(1) is to be in a format agreed between the <i>network operator</i> and AEMO and must provide at least the following information for each <i>discovery request</i> received during the month:</p> <ul style="list-style-type: none"> (a) the <i>MIRN</i>; and (b) the identity of the <i>user</i> lodging the request; and (c) the <i>discovery address</i>. <p>(4) AEMO may from time to time inspect each <i>user's</i> records of consent given under clause 72(1), to conduct a <i>negative assurance</i> of the <i>user's</i> compliance with clauses 72(1) and 72(4).</p>		
Clause 138	<p>AEMO:</p> <p>ATCO's proposed change from ongoing evaluations to a record of >10 TJ consumption over the previous two years does not require AEMO's involvement, and AEMO therefore maintains its proposal that the RMP (WA) be rewritten such that the network operator and users may communicate directly with one another to effectuate an above 10 TJ determination or a below 10 TJ determination. Regarding the change from the current assessment methodology under Clause 139 to a new methodology based on gas consumption's being greater than or equal to 10 per year for the two previous</p>			

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	<p>years, AEMO wishes to know participants' views on the matter. If the GRCF unanimously supports this change, AEMO will incorporate it into the PCR.</p> <p>ATCO:</p> <p>ATCO does not agree with AEMO's proposal to remove itself from cl 138 as previously noted.</p> <p>ATCO already discusses end-use customers' gas use needs with retailers and ATCO maintains that the Western Australia market operator should make a determination that is independent of ATCO's assessment of a customer's gas use needs and which is consistent with ATCO's approved Access Arrangements. As also noted it is ATCO's view that the 10TJ determination be absolute and not subject to ongoing and potentially subjective assessments and reassessments which do not add value.</p> <p>ATCO therefore proposes that rather than change AEMO's role, a sub clause is introduced to prescribe the conditions pursuant to which an existing delivery point must have an above 10TJ determination. ATCO proposes the condition should be:</p>			

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	"If gas consumption has been 10 TJ (or more) per year for the last 2 consecutive years then an interval meter must be fitted".			

***** Use this section to raise points that aren't specific to an RMP clause**
