

PROCEDURE CHANGE REQUEST (PCR)

Summary Section

Issue Number	IN003/20W		
Impacted Jurisdiction(s)	Western Australia (WA)		
Proponent	Joe Sanches	Company	ATCO Gas
Proponent e-mail	Joe.Sanches@atco.com	Proponent phone #	0417 030 319
Affected Gas Market(s)	• Retail	Date proposal sent to AEMO	Thursday, 28 November 2019
Short Issue Title	Update the gas retail market business processes, IT systems, and underpinning technical protocols to incorporate the following two aseXML transactions - CustomerDetailsNotification (CDN) and CustomerDetailsRequest (CDR) in the WA market		
Other key contact information	Arjun Pathy – arjun.pathy@aemo.com.au grcf@aemo.com.au		

VERSION #	PRESENTED TO	DATE
1.0	GRCF	13 July 2020



PROCEDURE CHANGE REQUEST (PCR)

1. DESCRIPTION OF ISSUE

1.1. Need for adoption of CDN/CDR transactions

ATCO Gas as the network operator is responsible for undertaking works including reconnections, planned and unplanned interruptions, and meter replacement works. These works generally requires the network operator to communicate with customers and frequently the network operator is unsure of the details they have or wishes to recheck those details. This frequently results in the network operator asking users to manually produce customer information and re-send it to them to support communications to customers. In particular, this becomes a substantial burden when dealing with unplanned outages and very short time frames.

To resolve this cumbersome process, ATCO Gas has proposed that the WA gas retail market adopt the CustomerDetailsNotification (CDN) and CustomerDetailsRequest (CDR) transactions in aseXML schema version r38. East coast gas retail market participants are also considering adopting the same transactions and aseXML version.

1.2. Outcomes of pre-consultation process

AEMO issued two questionnaires to the Gas Retail Consultative Forum (GRCF): one to gauge participants' interest in pursuing the CDN and CDR changes and one to determine whether a head of power existed for the provision of customer information to the network operator.

In relation to participant's interest, participants broadly expressed support for the changes, including the notion that bundling these WA changes with the east coast r38 program of work in Q4 2021 would be a cost-effective means to implement the changes.

In relation to whether a head of power existed for the provision of customer information to the network operator, responses were not unanimous regarding the existence of a head of power for the CDN and CDR changes. The responses were discussed at the June 2020 GRCF meeting, at which the GRCF agreed that the proposed changes should only make the use of the CDN and CDR transactions optional, with the option to further amend the Technical Protocol (TP) later to make their usage mandatory if a head of power could be found¹.

The full set of responses to each of these questionnaires is provided in Attachments C and D respectively.

2. REFERENCE DOCUMENTATION

2.1. Technical Protocol (TP) documentation

Please refer to Attachment B provides a detailed summary of the changes to each of the TP documents.

2.2. Schema Release documentations

Click [here](#) to view the index of Schema Releases from r13 to r38 inclusive.

¹ Please see the draft minutes from the June 2020 GRCF meeting.



3. OVERVIEW OF CHANGES

All Users and the Network Operator will need to make IT system changes, which will include incorporating the CDN and CDR transactions into WA gas retail market systems and modifying gas gateways to send and receive r38 transactions (see section 4 of the PCR for further information on IT system requirements).

The changes that AEMO will need to make include modification to the:

- WA gas retail market pre-production/certification environment responders to support r38 transactions.
- WA gas gateways to support sending and receiving r38 transactions. This includes ensuring that the WA Low Volume Interface (LVI) system supports the sending and receiving transactions in the r38 format.

As indicated in section 1 of this PRC, a change of this nature will mean that AEMO, the network operator and all users must migrate to schema version r38 concurrently. AEMO will therefore undertake a co-ordinated release program, which will include recertifying any modified transactions. For further details on the technical aspects of this change, please refer to section 4 of this PCR.

AEMO proposes a number of amendments to the TP documents for IT systems changes needed to adopt the CDN and CDR transactions and uplift the aseXML schema version to r38. A summary of the proposed TP amendments is presented in Attachment B. The tracked changes between the current version and the proposed changes are presented in Attachment E.

4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

Below is a summary of what AEMO envisages will be the impact on AEMO, users, and the network operator. This change will not impact self-contracting user² (SCU).

4.1. Effect on user and the network operator

The implementation effect across industry will see a secure reliable system to managed customer information. For this to be achieved all user and the network operator will need to make the following IT system changes:

- Modify gas gateways to send and receive transactions in aseXML schema version r38.
- Incorporate the gas CDN and CDR transactions into gas retail market systems.
- One month prior to the implementation date, complete a recertification process on all impacted transactions in accordance with process described in the Connectivity Testing and Technical Certification³ document.

4.2. Effect on AEMO

4.2.1. FRC Hub changes

AEMO will need to ensure that r38 transactions can pass through the FRC Hub. For this to be achieved AEMO will need to make the following IT system changes:

- Modify AEMO's gas gateways (including those managed by CGI, AEMO's outsourced service provider for WA gateways) so they have the capability to send and receive r38 transactions.

² Clause 2 (Definition) of the WA Retail Market Procedures defines the term "self-contracting user" as: "means a user that withdraws gas from a sub-network for the sole purpose of supply to a customer that is either itself or a related body corporate"

³ The current published version of the Connectivity Testing and Technical Certification document can be found clicking [here](#).



- Modify the pre-production/certification environment responders to support the r38 CDN and CDR transactions.
- One month prior to the implementation date, complete a recertification process on all impacted transaction in accordance with process described in the Connectivity Testing and Technical Certification document.

In addition to these technical changes, AEMO will prepare a schema manifest document that summaries each schema version change and will also facilitate the coordinated release program, as it has done for prior gas retail market aseXML schema uplift changes.

AEMO will provide this schema manifest document before the end of Q4 2020 to the Economic Regulation Authority for their approval.

4.2.2. Implementation timeframes

In terms of an implementation timeframe, as noted in section 1 of this PRC, bundling these WA changes with the east coast r38 program of work in Q4 2021 would be a cost-effective means to implement the changes.

5. IMPACT OF ISSUE NOT PROCEEDING

ATCO has provided advice to AEMO that if customers do not receive targeted and timely notifications of ATCO activities, customers may experience delays in gas supply restoration or supporting information, leading to a detrimental customer experience and complaints. ATCO may also potentially be at risk of non-compliance with the relevant rules and Gas Standards due to delays associated with out-dated information.

6. OVERALL COSTS, BENEFITS, AND MAGNITUDE OF THE CHANGES

AEMO has deemed this change to be material because of the change to IT systems and the industry coordination effort required to uplift the aseXML schema to schema version r38.

The benefits identified as part of pre-consultation include:

- WA gas retail market participants' increased ability to manage their regulatory obligations.
- Efficiencies for users when generating responses to ad-hoc requests for customer information.
- Improved timeframes for providing customer information.
- Ensuring that the network operator has up-to-date customer contact information.
- Efficiencies for users who operate in WA and the east coast, since all markets will be on the same schema.

At the time of preparing this PCR, AEMO is yet to obtain estimated costs for AEMO to implement this change. Given the implementation is leveraging the program of works for the east coast initiatives IN003/20 (Gas Life Support) and potentially IN011/20 (east coast CDN and CDR), AEMO envisages that the cost to implement this change will not be substantive. Details about AEMO's cost estimate will be included in the Impact and Implementation Report (IIR). There is no direct benefit for AEMO.

The estimated cost for WA gas retail market participants to implement this change will vary for each organisation and depend on several factors, including but not limited to, the complexity of IT system changes for that organisation.

The majority of participants in pre-consultation expressed that the benefits would outweigh the costs for their organisation. Of the three who did not (Origin Energy, Synergy, and Wesfarmers Kleenheat), Origin



Energy expressed that the change would still see some benefits from automation and schema harmonisation and Wesfarmers Kleenheat noted benefits to end consumers from the proposal.

As such, AEMO believes that the change represents a net benefit for the WA gas retail market as a whole.

7. AEMO'S PRELIMINARY ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH CLAUSE 378 OF THE RMP

<p>Ensure that the retail gas market operates and is governed in a manner that is,</p> <ul style="list-style-type: none"> (i) open and competitive; (ii) efficient; and (iii) fair to participants and their customers 	<p>AEMO's view is that the proposed change will continue to promote competition, is not unreasonably costly to implement and does not disadvantage participants or their customers.</p>
<p>Ensure compliance with all applicable laws</p>	<p>The proposed changes described in the PCR set the usage of this transaction as optional for participants. On that basis AEMO's view is that the proposed changes do not contravene applicable laws.</p>
<p>Ensure effective consultation occurs and gives stakeholder's opportunities to provide feedback of the proposed changes</p>	<p>AEMO's view is that the PCR and IIR rounds of this consultation will provide stakeholders with opportunities to provide feedback on the proposed changes.</p>

8. SUPPORTING DOCUMENTATION

See Attachment B.

9. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO will implement the changes described in this PCR targeted to take effect sometime between Q4 (Oct-Dec) 2021 and Q2 (Mar-Jun) 2022. In order to achieve this timeline, AEMO proposes the following key milestones:

- PCR issued 13 July 2020.
- PCR submissions close 24 July 2020.
- IIR issued 13 August 2020.
- IIR submissions close 10 September 2020.
- AEMO recommendation to ERA issued Q4 2020.



ATTACHMENT A – PCR RESPONSE TEMPLATE

The PCR response template has been attached separately to this document. There are two sections in the template:

- Section 1 seeks feedback on AEMO’s examination of the proposed changes.
- Section 2 seeks feedback on the marked-up changes to the TP described in Attachments E.

Anyone wishing to make a submission to this PCR consultation are to use this response template.

Submissions close Friday 24 July 2020 and should be emailed to grcf@aemo.com.au.



ATTACHMENT B – TECHNICAL PROTOCOL REFERENCE DOCUMENTATION (SEE SECTION 2)

The following table lists Technical Protocol (TP) documents that need to be amended. Since initiative IN011/20 (CDN and CDR changes for east coast gas retail markets) already proposes the implementation of the CDN and CDR transactions for the South Australian gas retail market, the changes to the Specification Pack documents are shown as incremental on those proposed in the IN011/20 IIR.

Ref#	Title of document and any notes.	Current Ver #	Summary of the changes between proposed procedures and the version proposed as part of IN011/20 IIR
1	<p>AEMO Specification Pack - FRC B2B System Interface Definitions</p> <p>Marked up showing differences between current version and version proposed as part of IN011/20 IIR</p>	4.6	<ol style="list-style-type: none"> Updated version history table Amended sections 4.6 and 4.7 to refer to both WA and SA, instead of just SA
2	<p>AEMO Specification Pack- Specification Pack Usage Guidelines</p> <p>Marked up showing differences between current version and version proposed as part of IN011/20 IIR</p>	8.1	<ol style="list-style-type: none"> Updated version history table Amended WA aseXML schema version to be r38

ATTACHMENT C – CONSOLIDATED FEEDBACK ON THE QUESTIONS PUT FORWARD ON TO PRIVACY AND WHETHER A HEAD OF POWER EXISTS FOR THE PROVISION OF CUSTOMER INFORMATION TO ATCO

Question	Company	Participant Response
<p>1. Does the provision of customer information to ATCO Gas for meter replacement purposes meets retailers' privacy obligations?</p>	AGL	Yes, the exchange of customer information for these purposes is contemplated under AGL's privacy policy.
	Agora Retail	Agora Retail believes that there is data transmitted that would meet the definition of personal information pursuant to the Privacy Act.
	Alinta	Yes. Alinta Energy's Privacy Policy allows us to disclose the information in the Customer Details Notification (CDN) transaction (including, for each MIRN, the information outlined in the FRC B2B System Interface Definitions document) if the purpose of providing this information is for the purposes of providing gas services to the customer.
	Origin Energy	Yes, the provision of customer information to ATCO Gas for meter replacement purposes meets retailers' privacy obligations.
	Simply Energy	There is no prescriptive answer to this as Simply Energy believes that Clause 21 'Confidentiality and Information Exchange' of the ATCO Gas Access Arrangement as well as with the obligations set out in the Energy Coordination (Customer Contracts) Regulations 2004 does not clearly articulate the intent to provision confidential information, where the request for customer data is intended to be used for the purpose of maintaining network devices (exchanging, removing, maintaining, etc.).
	Synergy	<p>Synergy has reviewed its operations and procedures and considers the provision of customer details to ATCO under the Retail Marker Procedures is consistent with our privacy obligations. Synergy's privacy obligations are outlined in its privacy policy which can be found at the following link https://www.synergy.net.au/privacy. Under Synergy's privacy policy, Synergy may disclose customer details to parties who are part of Synergy's processes to deliver services, for the purposes referred to in the privacy policy. This includes providing customers with gas supply services (they have requested) and to assist customers by providing them support.</p> <p>The parties that Synergy may disclose customer details to include network operators such as ATCO. Synergy will only disclose a customer's personal information to these (third) parties:</p> <ul style="list-style-type: none"> • for the purposes set out in Synergy's privacy policy or any agreement Synergy has with the customer; • in circumstances permitted by the Australian Privacy Principles; • if Synergy is otherwise required or authorised by law; or



Question	Company	Participant Response
		<ul style="list-style-type: none"> if the disclosure is made with the customer's consent.
	Wesfarmers Kleenheat	Yes. KH's privacy policy and collection of information statement (COIS) specifies that Kleenheat may from time to time provide personal information collected from customers to the natural gas distributor, i.e. ATCO.
<p>2. If the provision of customer information meets retailers' privacy obligations, retailers are to confirm that their supply contracts with their customers allow for this exchange of customer information to ATCO gas</p>	AGL	Yes, the exchange of customer information for this purpose is allowed.
	Agora Retail	Agora Retail believes that its current retail contract clauses permit this disclosure and is seeking further legal advice to ensure that it is fully compliant with the requirements of the National Privacy Principles.
	Alinta	Yes. Both Alinta Energy's standard form and non-standard contracts include a statement that a customer's personal information will only be disclosed in accordance with relevant legislation and with our Privacy Policy.
	Origin Energy	Yes. Origin Energy's Terms & Conditions provide that the Distributor is responsible for the distribution and supply of gas and will do what is required in that respect. Origin Energy will provide personal information of the customer to the distributor for the carrying out of the distributor's role.
	Simply Energy	Under the published Market Ts and Cs, Simply Energy is required to keep confidential information in accordance with relevant regulations unless a disclosure is required to comply with any legal or regulatory requirement.
	Synergy	<p>Synergy understands the only customer details that ATCO is seeking is:</p> <ul style="list-style-type: none"> Name Email Mobile phone number <p>Therefore, Synergy considers its privacy policy and supply contracts allow for this exchange of information to ATCO gas.</p> <p>Note – Given Synergy responds made reference only a sub set on the fields described in GMI attachments e-mailed on the 22nd May, AEMO ask Synergy the following question. For the CDN transaction the following fields are noted in the GMI attachments - NMI, NMI Check, Customer Name, Business Name, Business Contact Name, Postal Address, Deliver Point Identifier Phone1, Phone2,emailaddress, SensitiveLoad, Movement Type and Last Modified date, noting the fields above, does the last sentences "Therefore, Synergy considers its privacy policy and supply contracts allow for this exchange of information to ATCO gas" response provided as feedback still stand or do you want to changes your feedback to something else</p>



Question	Company	Participant Response
		<p>Synergy's response is contained below :</p> <p>Thanks for your email and the opportunity for Synergy to clarify its position. Our feedback only relates to situations where the network operator needs to directly contact a customer to give effect to a network (covered) service for the customer.</p> <p>Our technology team is still reviewing the proposed build pack changes (including the mandatory and optional data fields and the r38 schema uplift) from a technical and operational perspective; and are still consulting with internal stakeholders.</p> <p>R38 schema uplift, build pack and retail market procedure – using customer data</p> <p>However, we recognise the build pack cannot be inconsistent with the applicable laws that apply in a particular state. In our view the build pack, in itself, cannot create or force a regulatory obligation. The impact of the additional information below (outlined in the build pack as part of the r38 schema uplift) was not readily apparent in the GMI (and questionnaire) - in relation to the extent WA participants have a regulatory obligation to collect, maintain, keep accurate and disclose the information to the network operator for:</p> <ul style="list-style-type: none"> - Postal address - Sensitive load (and life support) <p>It is also not clear in the GMI how the network operator (under the Retail Market Procedures) is permitted to use this information. The information below also appears to correspond to electricity transactions (Eg. reference in the build pack to NMI, sensitive load and life support) in WA and the NEM. In addition, the WA Retail Market Procedure (RMP) may not align with the NEM gas regulations in relation to these matters. Therefore, our view is that it should not be mandatory to disclose such information in WA and the applicable build pack data fields for WA should be marked as "optional" or "not applicable" – in relation to the schema uplift to r38.</p> <p>This additional data, for electricity, is regulated and coordinated separately (from privacy legislation) in WA under the WA Metering Code, Network Supply Reliability Code and Small Use Customer Code of Conduct. For example, the Metering Code requires "postal address" to be disclosed specifically for (network operator) outage notification purposes in accordance with the Network Supply Reliability Code and cannot be used for any other purpose. The electricity legislation in WA also provides a head of power that requires this type of information to be collected, maintained in a timely manner, disclosed and kept accurate.</p> <p>Please note "postal address" is also used in the WA electricity market for the network operator to notify customers of a network curtailment. However, I think curtailment of the gas distribution networks in WA may follow a different process.</p>



Question	Company	Participant Response
		<p>Therefore, our questionnaire feedback does not cover these additional matters which are not regulated under the RMP (or do not have a head of power under the RMP). In particular, Synergy would need to understand what constitutes “sensitive load” (or life support) and how it works under the gas RMP and the provision of a (covered) network service. We would also need to understand how “postal address” will be used by the network operator under the RMP. That is, whether it is required for outage notification, curtailment and/or correspondence with the customer. Therefore, our feedback does not apply to this additional information – that is in particular information in relation to:</p> <ul style="list-style-type: none"> - Postal address - Sensitive load <p>We also note that “street address” already forms part of the data in the registry for the MIRN which the network operator has access too.</p> <p>Scope of our feedback and interim guideline</p> <p>Therefore, our feedback relates to disclosing only the necessary information to the network operator for the network operator to directly contact a customer to give effect to a network (covered) service for the customer (Eg. connections, disconnections, meter change, meter read, meter test... etc). It is not clear to us how and when the network operator will use data in relation to “postal address” and “sensitive load” and the retailers obligation to collect, maintain and ensure this data is accurate. WA electricity regulations and operational processes around registering, updating and using (life support) sensitive load data is substantial.</p> <p>We note the additional customer information has also been included in the interim guideline. Please note our view of the guideline is that it is an interim voluntary guide in relation to disclosing information to the network operator – to the extent it is consistent with Synergy’s privacy policy and applicable regulations. We will be adding this feedback to our response on the guideline due this Friday.</p> <p>I understand the IN003/20W is evolving from its original scope of assisting the network operator with MIRN connections and disconnections – where the network operator needs to directly contact the customer. Therefore, we consider it is important to understand and align the regulatory, operational and technical requirement for each item of data. We expect this will normally occur as the IN003/20W and r38 schema uplift progresses through the various consultation stages.</p>
	Wesfarmers Kleenheat	<p>Yes. Both our small and large use contracts specifies that the network operator may replace metering equipment/meters. This, read in conjunction with the privacy policy and COIS, in our view enables an exchange of personal information to operate between ATCO and Kleenheat’s customer base.</p>



Question	Company	Participant Response
<p>3. Any other comments on the topic of provision of customer information pertaining to this initiative</p>	AGL	<p>The Template Service Agreement between ATCO and users provides a contractual basis for the disclosure, exchange and protection of confidential information. See Appendix A for a relevant extract of the agreement.</p> <p>Any customer information provided by a user to ATCO must be treated as confidential information in accordance with the definition of this term and as set out in clause 21.1(a)(i). Further noting the obligations in clause 21.3 to comply with any privacy requirements in relation to information exchanged.</p> <p>As detailed by Alinta, the format for the exchange of information between ATCO and users must comply with clause 21.4. Also noting that any confidential information must only be used in connection with the exercise of a party's right or performance of its obligation under the agreement (clause 21.1(a)(i)(B)).</p>
	Agora Retail	No further comments.
	Alinta	<p>A "head of power" for the provision of customer data by the retailer to the network operator is not immediately obvious.</p> <p>Clause 3.5.2.1(i) of the AGA Code infers a distributor would have the relevant customer information needed to contact a customer if required:</p>



Question	Company	Participant Response
		<p>undertake inspections, repairs, testing or maintenance of the <i>distribution system</i> at the <i>supply address</i>, shall give the <i>customer</i> at that <i>supply address</i> notice of its intention.</p> <p>Clause 33(3) of the <i>Energy Coordination (Customer Contracts) Regulations 2004</i> includes:</p> <p>(3) A standard form contract must include provisions that have the same effect as clause 3.5.2 of the AGA Code.</p> <p>Note for this regulation: Clause 3.5.2 of the AGA Code sets out notice and identification requirements to be observed when access to a supply address is sought.</p> <p>3.5.2 Obligations on a Supplier or a Distributor</p> <p>3.5.2.1 (i) Except in the case of an <i>emergency</i>, suspected illegal use, or routine <i>meter</i> replacements, or the <i>customer</i> consenting to a shorter time, a <i>supplier</i> or <i>distributor</i> intending to</p> <p>It should be noted that the Customer Contracts Regulations were under review by the PUO (now EPWA) in 2019 and amendments have not yet been finalised. If a head of power is still being sought it may be worth raising with EPWA whether a suitable amendment can be included here.</p> <p>-</p>
	Origin Energy	<p>Origin Energy seek clarification on the manner in which the information will be disclosed and stored. In addition, will the appropriate IT Security and Risk assessments be undertaken?</p> <p>Who will be providing this assurance i.e. AEMO or ATCO?</p>
	Simply Energy	<p>The market contract terms has an obligation on customer in relation to 'Meters and gas supply equipment', that in order to allow the supply of gas to the premises, customer must give their retailer, distributor and other relevant people (including any meter service provider), who provide their official identification if requested, safe, convenient, easy and unrestricted access to the premises, the gas supply equipment, the distribution network and the meter at the premises including to read the meter, to install gas supply equipment, to inspect or work on your equipment or the gas supply equipment, or for any other reason relating to the supply of gas at their premises.</p> <p>In absence of a clear obligation on retailers to provide customer data to the distributor for the purposes mentioned above, Simply Energy suggests that ATCO may want to raise a 'variation' to</p>



Question	Company	Participant Response
		the current template service agreement (Access Arrangement), and include the 'provisioning of customer data', for specific reasons, as a binding obligation instead of seeking interpretational responses from individual retailers.
	Synergy	<p>Cyber security considerations – CDN lifecycle</p> <p>In addition, to the procedural consideration (discussed above) Synergy considers that we should not lose sight of the technology risks or implications for the end-to-end CDN process. Synergy understand that, if approved, the CDN transaction will form part of the build pack and all participants would be subject to to the confidentiality provision in the Retail Market Procedure (Part 8.2) and Access Contract between Synergy and ATCO. However, Synergy notes that Part 8.2 does not expressly discuss cyber security requirements.</p> <p>Therefore, Synergy considers it would be good to have more information on ATCO's cyber security mechanisms. For example, how and where the information will be stored and managed (and disposed where required). Synergy's privacy policy requires Synergy to store customer information securely, so we need to make sure that the (end-to-end) CDN process and lifecycle is consistent with our policy.</p>
	Wesfarmers Kleenheat	Yes. KH's privacy policy and collection of information statement (COIS) specifies that Kleenheat may from time to time provide personal information collected from customers to the natural gas distributor, i.e. ATCO.



ATTACHMENT D – CONSOLIDATED FEEDBACK ON THE QUESTIONS PUT FORWARD ON IN003/20W – (ADD CDN AND CDR)

Question	Company	Participant Response
<p>1. In terms of the overall technical design of this proposal (see section 4 of the GMI – e.g. moving to a non-Comma-Separated Values (CSV) file in the aseXML payload and adding the CDR aseXML transaction to suit of gas retail transactions), does your organisation support the proposal as it is described in the GMI? If not, what changes need to be made in order to gain your support?</p>	AGL	AGL supports this proposed change
	Agora Retail	Agora Retail supports the approach as proposed in the GMI.
	Simply Energy	Simply Energy would agree to make CDN/CDR transaction from csv to xml, when harmonised with other Gas jurisdictions, to avoid bespoke-build requirements for WA Gas.
	Alinta	<p>Alinta Energy supports the overall technical design to:</p> <ol style="list-style-type: none"> 1. Replace the existing version of the CDN transaction with an aseXML-payload version that does not contain the CSV file format; 2. Add the CDR transaction to the suit of aseXML transactions to allow the network operator to request confirmation of customer information from the user; and 3. Upgrade the existing schema from the current version r13 to r38
	Origin Energy	<p>In terms of overall technical design of this proposal, Origin Energy support moving to a non-Comma-Separated Values (CSV) file in the aseXML payload.</p> <p>Origin Energy understand a CDR is currently being proposed for the East Coast market and if accepted across all jurisdictions will support the CDR aseXML transaction for WA.</p> <p>This is because Origin Energy believe this proposal is best bundled with various other gas market changes i.e. life support, CDN/CDR for East Coast.</p>
	Kleenheat	Yes, Kleenheat are supportive of the proposed technical design.
Synergy	<p>Synergy understands the proposed design will involve a schema uplift to r38. Implementation is proposed for Q4 2021. Synergy supports this technical design.</p> <p>In the meantime Synergy understands that it is proposed participants implement a voluntary and manual process for exchanging CDR and CDN data using emails and CSV files.</p> <p>In relation to security Synergy considers that there are two elements that will need to be considered:</p> <ul style="list-style-type: none"> • How the data is transmitted or delivered; and 	



Question	Company	Participant Response
		<ul style="list-style-type: none"> How the data will be stored and used at the destination. <p>Synergy does not support the proposed interim (email) approach to delivery, as we believe this introduces significant cyber security risk. Synergy would support a method such as sftp to transmit CDR and CDN csv files, which provides a more secure framework for data transfer.</p>
	ATCO	ATCO supports the technical design proposed in section 4 of the GMI
<p>2. In terms of the prioritisation and timeline (see section 3 of the GMI – e.g. most cost effective and efficient means to implement the changes set out in the GMI would be to include the change in the east coast gas life support (GLS) program of work), does your organisation support the idea of bundling these changes with the east coast GLS program of work (if this program of work goes ahead)? If not, what changes need to be made in order to gain your support? .</p>	AGL	AGL sees benefit and efficiencies in aligning this change with other similar changes
	Agora Retail	Agora Retail has no issue with the timing of the proposed changes an inclusion with the eastern states life support program of work but would not support the change to XML payload (and consequential schema change) if this initiative was only required to support the convergence to life support processes in the eastern jurisdictions
	Simply Energy	Yes, Simply Energy supports this proposal
	Alinta	<p>Alinta Energy supports the proposal to align the recommended changes with the east coast gas life support program of work so as to reduce the associated costs.</p> <p>The proposed timeframe of Q4 (Dec) 2021 may pose a few challenges to our business due to the planned implementation of new internal systems and processes.</p>
	Origin Energy	<p>As per response to Question 1, Origin Energy supports this change if bundled with other East Coast and WA changes. This will also mean that testing for all transactions can be done at the same time creating efficiency.</p> <p>In terms of timeline, Origin Energy recommend AEMO implement this GMI post Q4 2021 due to several Retail initiatives currently being prioritised. Q4 2022 is the optimum time to implement all gas changes.</p> <p>The deferral of 5MS is proposed for 1 July 2022. Should this rule change take affect this presents a risk to deliver Gas market changes prior to 1 July 2022. Compounding this are other initiatives, such as Wholesale Demand Response, Energy Consumer Rights, MSATS Standing Data Review (including Planned Interruption) and Customer Switching are proposed to be delivered 2021 or spill into 2022. Therefore, Q4, 2022 or later presents the least risk and optimal time to deliver for CDN/CDR for WA.</p>



Question	Company	Participant Response
	Kleenheat	<p>Kleenheat is unable to provide an estimation as to how this work would be prioritized by our business. Our timeline is heavily influenced by</p> <p>a) whether this proposal became mandatory for retailers to implement; and</p> <p>b) what the planned implementation date would be.</p> <p>Kleenheat would like at least 6 months' notice from the planned implementation date</p>
	Synergy	<p>Synergy recognises that other industry participants (on the high volume interface) may benefit from this system change. Therefore, Synergy considers, if the change is widely supported, it would be sensible to coordinate the schema uplift in WA with the GLS program of work - to Synergy recognises that other industry participants (on the high volume interface) may benefit from this system change. Therefore, Synergy considers, if the change is widely supported, it would be sensible to coordinate the schema uplift in WA with the GLS program of work - to the extent it creates efficiencies in system integration testing with participants and the efficient resolution of defects.</p> <p>Given this Synergy supports the above position on bundling.</p>
	ATCO	<p>ATCO proposed the introduction of the transactions in WA gas retail market to support its obligations for ATCO to manage customer details. ATCO believes the inclusion of this proposal into the east coast r38 program would be an effective means to implement the changes.</p>
<p>3. In terms of the likely benefits (see section 6 of the GMI), does your organisation agree with the points raised in this section? Also does your organisation expect that the benefits will outweigh the costs?</p>	AGL	AGL agrees with the benefits
	Agora Retail	<p>Agora Retail agrees that the benefits are likely to outweigh the costs in a scenario where there is a clear driver to move from CSV email attachments to embedded XML, but do not agree that this is warranted in the WA jurisdiction without a life support requirement. Should other initiatives necessitate a schema change in WA, Agora Retail would support the change.</p>
	Simply Energy	<p>Simply Energy is fairly aligned with the benefits, however not when WA Gas changes are assessed in isolation.</p>
	Alinta	<p>In the longer term, the benefits of implementing this proposal will outweigh the costs by reducing the issues associated with manual data transactions.</p>



Question	Company	Participant Response
	Origin Energy	In addition to the benefits outlined in section 6 of the GMI, the implementation of an automated exchange does reduce the manual effort required to provide this information. There is also benefit in uplifting all jurisdictions to the same schema. However, our analysis revealed the cost to implement outweighs the benefits from a Retailer perspective, as most benefits are intangible.
	Kleenheat	There are no tangible benefits for Kleenheat itself in terms of cost savings etc however we can see the benefit flowing to customers of this proposal
	Synergy	Synergy uses the low volume interfaces and has previously advised that it considers that there is likely to be material costs involved with implementing a schema uplift. Therefore, given Synergy's low level of disconnection service requests. Synergy does not consider it will realise any material benefits or reduced operational costs from implementing this change.
	ATCO	ATCO agrees there are benefits to introducing these transactions in WA gas market. As noted in section 6 of this includes improvement to customer data quality and management to support ATCO's safe and reliable provision of delivery point reconnections, planned interruptions for maintenance and dealing with unplanned interruptions.
4. Any other comments on this proposal?	AGL	No further comment
	Agora Retail	No further comments.
	Simply Energy	
	Alinta	As noted above, the timing of new system implementations may present some challenges concerning the required schema upgrade, however we would be happy to work through these with AEMO. One option may be. that we continue our current work around with ATCO until we transition to our new system.
	Origin Energy	
	Kleenheat	
	Synergy	R38 schema uplift, build pack and retail market procedure – using customer data



Question	Company	Participant Response
		<p>Synergy considers the build pack outlines the detailed technical specifications (file formats, protocols and timeframes) as to how data and information communication is to be implemented between participants for business-to-business communication. Including how the necessary information systems are to be designed and developed.</p> <p>Therefore, Synergy considers the build pack cannot be inconsistent with the applicable laws that apply in a particular jurisdiction. In our view the build pack, in itself, cannot create or force a regulatory obligation. The impact of the additional information below (outlined in the build pack as part of the r38 schema uplift) needs to be considered within the WA regulatory framework:</p> <ul style="list-style-type: none"> • Postal address • Sensitive load (and life support) <p>For example, in relation to the extent WA participants have a regulatory obligation to collect, maintain, keep accurate and disclose this information to the network operator. There also needs to be regulatory certainty in relation to how the network operator is permitted to use this information under the WA retail market scheme.</p> <p>The WA Retail Market Procedure (RMP) may not provide sufficient regulatory certainty or align with the NEM gas regulations in relation to these matters. Therefore, our view is that it should not be mandatory to disclose such information in WA and the applicable build pack data fields for WA should be marked as “optional” or “not applicable” – in relation to the schema uplift to r38.</p> <p>This type of additional data, for electricity, is regulated and coordinated in WA under the WA Metering Code, Network Supply Reliability Code and Small Use Customer Code of Conduct. For example, the Metering Code requires “postal address” to be disclosed specifically for (network operator) outage notification purposes in accordance with the Network Supply Reliability Code and cannot be used for any other purpose. The electricity legislation in WA also provides a head of power that requires this type of information to be collected, maintained in a timely manner, disclosed and kept accurate.</p> <p>Please note “postal address” is also used in the WA electricity market for the network operator to notify customers of a network curtailment. However, I think curtailment of the gas distribution networks in WA may follow a different process.</p> <p>In particular, WA participants would need to understand what constitutes “sensitive load” (or life support) and how it works under the gas RMP and the provision of a (covered) network service. Participants would also need to understand how “postal address” will be used by the network operator under the RMP. That is, whether it is required for outage notification, curtailment and/or correspondence with the customer. Noting that “street address” already forms part of the data in the registry for the MORN which the network operator has access too. Therefore, our feedback relates to disclosing only the necessary information to the network operator for the network</p>



Question	Company	Participant Response
		<p>operator to directly contact a customer to give effect to a network (covered) service for the customer (Eg. connections, disconnections, meter change, meter read, meter test... etc). It is not clear to us how and when the network operator is permitted to use data in relation to “postal address” and “sensitive load” and the retailers obligation to collect, maintain and ensure this data is accurate. WA electricity regulations and operational processes around registering, updating and using (life support) sensitive load data is substantial.</p> <p>We note this additional customer information has also been included in the interim guideline. Our view of the guideline is that it is an interim voluntary guide in relation to disclosing information to the network operator – to the extent it is consistent with Synergy’s privacy policy and applicable regulations. We understand IN003/20W is evolving. Therefore, we consider it is important to understand and align the regulatory, operational and technical requirement for each item of data.</p>
	ATCO	ATCO has no further comments on this specific proposal, however we also note and support the industry guide that is being developed ahead of the potential introduction of IN003/20W.



ATTACHMENT E – DOCUMENTATION CHANGES (SEE SECTION 3)

Draft versions of the TPs are attached separately to this document. The text shown in [blue underline](#) show changes between the current version and the proposed changes.