

# PROPOSED PROCEDURE CHANGE (PPC)

**Issue Number** IN011/20

**Impacted Jurisdiction(s)** New South Wales–Australian Capital Territory, Queensland, South Australia, and Victoria

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**Affected Gas Market(s)** • Retail **Date proposal sent to AEMO** Friday, 1 November 2019

**Short Issue Title** Update the gas business processes, IT systems, and underpinning technical protocols to incorporate aseXML CustomerDetailsNotification (CDN) and CustomerDetailsRequest (CDR) transactions

**Other key contact information** [grcf@aemo.com.au](mailto:grcf@aemo.com.au)

VERSION #	PRESENTED TO	DATE
1.0	GRCF	25 May 2020



## PROPOSED PROCEDURE CHANGE (PPC)

### 1. DESCRIPTION OF ISSUE

Currently, the business processes for provision of up to date customer contact details differ between the gas retail market (GRM) from the electricity retail market (ERM). The major differences are:

- (a) The ERM has a CustomerDetailsRequest (CDR) transaction that allow the distributor to request the retailer to send a CustomerDetailsNotification (CDN) transaction.
- (b) The GRM uses a comma-separated-values (CSV) file in an aseXML payload for the CDN transaction, whereas the ERM uses a non-comma-separated values (CSV) file in an aseXML payload (The CDN in gas is transaction number T70; for further details see section 4.6.2 (Amend Customer Details) of the PBP3 B2B interface Definitions document, which you may view [here](#)).

These transactions (CDN and CDR) were enhanced for the ERM in February 2019 as part of the ERM Life Support (LS) program of work, which included adopting the r38 version of the aseXML schema.

In mid-April 2020, AEMO issued a Gas Market Issue (GMI) that proposed enhancements to the CDN transaction and the adoption of the CDR transaction and for these enhancements to be combined with the gas LS enhancements to form a single IT system release cycle targeting Q4 (Oct-Dec) 2021. The GMI noted that these changes are integral to the current Gas Retail Consultative Forum (GRCF) LS program of work (IN003/20) in that the gas LS changes provide only the additional gas LS patient details and not the account holder details (which would be provided and requested by the CDN and CDR transactions respectively). The GMI also noted that the lack of a CDR transaction means a gas distribution business cannot easily query a gas retailer to check customer details, which results in manual requests for information and spreadsheets' being shared between businesses.

GRCF feedback on the GMI was supportive: nine participants were supportive (including all distributors who submitted feedback) and two were opposed<sup>1</sup>. At the 21 May 2020 GRCF meeting, the GRCF agreed that there was sufficient consensus on the initiative to warrant AEMO's proceeding with a PPC for the change<sup>2</sup>.

### 2. REFERENCE DOCUMENTATION

#### 2.1. Customer and Site Details Notification Process

As outlined in Section 1, the proposed changes are based off the existing CDN and CDR transactions in the ERM. The documentation for these transactions can be found in the Customer and Site Details Notification Process document [here](#).

#### 2.2. Technical Protocol (TP) documentation

Please refer to Attachment B for a list of affected Technical Protocols (TP).

#### 2.3. Gas Life Support documentation

The existing changes to gas retail market systems proposed as part of consultation IN003/20 (Gas Life Support) can be found [here](#).

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<sup>1</sup> Those in favour were: AGL, AGN, Alinta Energy, APA Group, AusNet Services, EnergyAustralia, Jemena Gas Networks, Multinet Gas, and Red and Lumo Energy. Those opposed were: Origin Energy and Simply Energy.

<sup>2</sup> See the draft minutes circulated following this meeting.



### 3. OVERVIEW OF CHANGES

The changes proposed are:

- To move to an aseXML payload in an aseXML transaction for the CDN transaction.
- To adopt the CDR aseXML transaction.

These have been prepared using Sections 5.1 and 5.2 of the ERM Customer and Site Details Notification Process.

A full description of the required TP changes from this transaction is provided in Attachment B.

### 4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

The changes proposed as part of consultation IN003/20 (Gas Life Support), if they proceed, will already obligate east coast gas retail markets to adopt schema version r38. The implementation effects for the transition to schema version r38 are detailed in the IN003/20 IIR [here](#).

Below is a summary of what AEMO envisages will be the incremental requirements beyond those that already form part of IN003/20 on AEMO, retailers, and distributors. This PPC therefore does not consider broader r38 aseXML uplift mentioned in IN003/20.

#### 4.1 Effect on Retailers and Distributors

All retailers and distributors will need to make IT system changes, which will include:

- Modify gas gateways to send and receive the modified aseXML payload version of the CDN transaction and the inclusion of the new CDR transactions.
- Incorporate the modified aseXML payload version of the CDN transaction and the inclusion of the new CDR transactions into gas retail market systems.

#### 4.2 Effect on AEMO

AEMO will need to make the following IT system changes:

- In relation to the FRC HUB modify the pre-production/certification environment responders to support the modified aseXML payload version of the CDN transaction and the inclusion of the new CDR transactions.
- In relation to aseXML schema transformation engine for Wagga Wagga and Tamworth network modify this system so it can validate, send and receive the modified aseXML payload version of the CDN transaction and the new CDR transactions.
- In relation to NSW Low Volume Interface (LVI) modify this interface so it can validate, send and receive the modified aseXML payload version of the CDN transaction and the new CDR transactions.

Underpinning these system changes, AEMO will need to amend several TP documents, as detailed in Attachment B.

This change will not impact participants who fall into the Self Contracting User (SCU) registerable capacity under the National Gas Rules (NGR).

### 5. IMPACT OF ISSUE NOT PROCEEDING

Retailers and distributors risk not managing Life Support registrations correctly, as the distributor will not be able to automatically check customer details with the relevant retailer.



Further, if customers do not receive targeted and timely notifications of distributor activities, customers may experience delays in gas supply restoration or supporting information, leading to a detrimental customer experience and complaints. Distributors may also potentially be at risk of non-compliance with the relevant rules of Gas Codes due to delays associated with out-of-date information. This may be particularly relevant in relation to Life Support obligations and management of planned and unplanned outages.

## 6. OVERALL COST, BENEFITS AND MAGNITUDE OF THE CHANGES

This change entails both tangible benefits (in terms of regulatory fines avoided) and non-tangible benefits (in terms of better customer experience and compliance with relevant Gas Codes).

Benefits identified during pre-consultation were:

- Regulatory obligations for managing customer data and Life Support registrations require that all parties have effective, efficient and auditable transaction trails. The LifeSupportNotification only fulfils this requirement for the details of the life support customer, not for those of the account holder (these are contained in the CDN transaction).
- The proposed changes would facilitate better communication between gas retail market participants, which would assist distributors in managing their regulatory obligations and compliance with various Rules, including the newer Life Support obligations. This is especially salient considering distributors have identified that they currently have poor customer details.
- When distributors issue planned outage notices (e.g. for meter replacements) or need to manage accidental outages, there is often a need to have the retailer generate updated details manually, which may not occur for unplanned outages. This is resolved by the proposed changes in that the information for each MIRN is sent in an individual transaction by the FRO retailer to the distributor each night when the account is created or when some aspect of those details change (e.g. when a phone number changes). Equally, if the distributor wishes to check or query the customer details for a MIRN, the distributor can send the retailer an CDR which will automatically be replied to with a CDN.
- Replacing the .csv payload with the individual aseXML elements is that the distributor can choose to validate the information on an individual MIRN basis, rather than having to process and manage and validate the contents of a .csv file.
- Moving the process to an aseXML-transactional process would ensure that the distributor has received the latest information from the retailer and that the distributor can transactionally request an update which can be fulfilled automatically, and often in a short time frame.
- The change will harmonise transactions across electricity and gas retail markets.

Further, as outlined above, nine of the 11 respondents to the pre-consultation were supportive of the changes and expressed that the benefits would be greater than the cost for these changes.

As noted in Section 4, this initiative will proceed only if initiative IN003/20 proceeds. As such, the costs of implementing CDN / CDR do not include the cost of upgrading to r38 (which would be necessary already from IN003/20) but rather only include the incremental changes additional to that uplift. Participants have expressed during pre-consultation that the incremental cost of implementing CDN/CDR on top of the changes proposed in IN003/20 is not expected to be high. While AEMO has not formally costed the changes proposed in this PPC, AEMO also does not expect the incremental cost to be high. As such, the benefits in aggregate are expected to outweigh the costs.



## 7. CONSISTENCY WITH NATION GAS RULES (NGR) AND NATIONAL GAS OBJECTIVE (NGO)

Consistency with National Gas Law (NGL) and NGR	AEMO’s view is that the proposed change is consistent with the NGL and NGR. AEMO also believes that this change is consistent with Part 7 of the National Energy Retail Rules (NERR), Part 7 of the Victorian Energy Retail Code, and section 4A of the Victorian Gas Distribution System Code. No participant raised any objections during the pre-consultation process to the proposal’s consistency with any of these documents.
National Gas Objective	As outlined in Section 6, it is AEMO's view that this change would facilitate efficient operation of the retail gas market by providing a cost-effective solution allowing timely transmission of customer information.
Any applicable access arrangements	AEMO’s view is that the proposed change is not in conflict with existing Access Arrangements. No participant raised any objections during the pre-consultation regarding the proposal’s consistency with any existing Access Arrangements.

## 8. SUPPORTING DOCUMENTATION

Attachment C provides changes-marked versions of the affected TPs.

## 9. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO will implement the changes described in this PPC 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:

- PPC issued 25 May 2020.
- PPC consultation closes 12 June 2020.
- IIR issued 26 June 2020.
- IIR consultation closes 24 July 2020.
- AEMO Decision issued late August 2020.

The publishing of the Notice of effective date is targeted for Q3 (Jul-Sept) 2021<sup>3</sup>

<sup>3</sup> This date has been chosen to allow time for any additional changes to be incorporated in a aseXML schema uplift beyond r38. Consultation on those additional changes must have commenced by 1 June 2020 to be considered as part of the Q4 2021 implementation date



## **ATTACHMENT A – PPC RESPONSE TEMPLATE**

The PPC 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 C.

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

Submissions close 12 June 2020 and should be emailed to [grcf@aemo.com.au](mailto: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. The table also provides a summary of the changes between the procedures proposed in this IIR and the current published version of the TP documents, as well as between the procedures proposed in this IIR and the procedures proposed in the PPC. Attachment C contains a draft version of the TP showing tracked changes between the current published version and the changes proposed in this IIR.

Ref#	Title of document and any notes.	Current Ver #	Summary of the changes between proposed procedures and the procedures published with the <u>IN003/20 IIR</u>
<b>Victoria</b>			
1	<b>Participant Build Pack 1 - Table of Transactions, Table of Elements, List of Job Enquiry Codes, Address Elements and MIRN and Meter states.</b>  Marked up showing differences between current version.	3.5	1. Add the CDR transactions (72) to the Process Flow Table tab. 2. Update “Elements” tab to include the new CDR and updated CDN elements
2	<b>Participant Build Pack 3 - Interface Definitions</b>  Marked up showing differences between current version.	3.6	1. Update section 4.6 to incorporate the amended CDN and the new CDR transactions 2. Update Appendix A (Data Dictionary) to include the new CDN and CDR aseXML element names.
3	<b>Gas Interface Protocol – Victoria</b>  Marked up showing differences between current version.	21.0	1. Update the version history to include IN011/20 as well as IN003/20.
<b>Queensland</b>			
4	<b>Gas Interface Protocol – QLD</b>	20.0	2. Update the version history to include IN011/20 as well as IN003/20.



Ref#	Title of document and any notes.	Current Ver #	Summary of the changes between proposed procedures and the procedures published with the <u>IN003/20 IIR</u>
	Marked up showing differences between current version		
<b>NSW/ACT</b>			
5	<b>NSW/ACT specific Participant Build Pack 5</b>  Marked up showing differences between current version	5.0	1. Update section 3 (Transaction Changes) to changes to CDN (70) and new CDR (72). The update includes that they are flagged as “No change” (NC), meaning that technical details within the Victorian Participant Build Pack applies for the new CDR and updated CDN transactions.
6	<b>NSW/ACT Wagga Wagga and Tamworth specific Participant Build Pack 6</b>  Marked up showing differences between current version	3.0	1. Update the version history to include IN011/20 as well as IN003/20.
7	<b>Gas Interface Protocol – NSW/ACT</b>  Marked up showing differences between current version	9.0	1. Update the version history to include IN011/20 as well as IN003/20.
<b>South Australia</b>			
8	<b>AEMO Specification Pack - FRC B2B System Interface Definitions</b>  Marked up showing differences between current version	4.6	1. Update section 4.6 to incorporate the amended CDN and the new CDR transactions 2. Update Appendix A (Data Dictionary) to include the new CDN and CDR aseXML element names.
9	<b>AEMO Specification Pack- Specification Pack Usage Guidelines</b>	8.1	1. Update the version history to include IN011/20 as well as IN003/20.





PROPOSED PROCEDURE CHANGE (PPC)  
IN011/20: ADOPTION OF ASEXML CDN AND CDR



Ref#	Title of document and any notes.	Current Ver #	Summary of the changes between proposed procedures and the procedures published with the <u>IN003/20 IIR</u>
	Marked up showing differences between current version		



## **ATTACHMENT C – DOCUMENTATION CHANGES (SEE SECTION 3)**

Draft versions of the TPs showing tracked changes between the current version and the proposed changes are attached separately to this document.