

IMPACT & IMPLEMENTATION REPORT (IIR)

Summary Section

Issue number	IN004/17		
Impacted jurisdiction(s)	NSW/ACT, Qld, SA and Vic.		
Proponent		Company	AEMO
Affected gas market(s)	Retail	Consultation process (ordinary or expedited)	Ordinary
Industry consultative forum(s) used	GRCF	Date industry consultative forum(s) consultation concluded	Monday, 8 February 2021
Short description of change(s)	Minor changes to the Retail Market Procedures (RMP) and Technical Protocols (TP) to progress industry's broader program of work to harmonise the various jurisdictional retail documentation wherever possible.		
Procedure(s) or documentation impacted	RMPs and TPs for Vic, NSW/ACT, SA and Qld.		
Summary of the change(s)	The changes proposed in this Impact and Implementation Report (IIR) involve minor rewording of several existing definition and clauses. It is AEMO's view that none of these changes significantly alter any of the existing obligations placed on participants or AEMO. Some participants may need to make minor process changes.		
IIR prepared by	AEMO	Approved by	Michelle Norris
Date IIR published	15 February 2021	Date consultation concludes	16 March 2021
Email address for responses	grcf@aemo.com.au		
Other key contact information			



IMPACT & IMPLEMENTATION REPORT

1. DESCRIPTION OF ISSUE

The changes proposed in this Impact and Implementation Report (IIR) mostly involve minor rewording of some existing clauses within the Retail Market Procedures (RMP) so that they align with other east coast jurisdictions. It is AEMO's view that none of these changes significantly alter any of the existing obligations placed on participants. Some participants may need to make minor process changes.

These changes contribute to AEMO and industry's long-term aim to increase consistency between the regulatory frameworks and create efficiency for those participants operating in multiple east coast gas retail markets.

The following is a list of 15 existing initiatives that shape the scope of works for this consultation:

- IN002/18 - Add a provision that describes that AEMO can lodge a transfer on behalf of a Self Contracting Users (SCU) as per SA RMP. This was raised by AEMO as part of SA RMP harmonisation (IN006/17).
- IN004/17 - Add a downgrade process to the RMPs. This was raised by AGL as part of minor changes to the gas RMP to support to harmonisation (IN027/14).
- IN004/19 - The NSW/ACT RMP should be updated to reference number of hours "from the start of the gas day" like the other jurisdictions. This was raised by AGL as part of the gas day harmonisation consultation (IN002/16).
- IN005/19 - Remove redundant transitional provision in Chapter 12A. This was raised by AGL as part of the gas day harmonisation consultation (IN002/16).
- IN005/20 - Review of RMPs address based identifiers process to determine if the WA change needs to be applied to other jurisdictions. This was raised by AGL and Origin Energy (OE) as part of adding an address attribute change process in WA (IN003/18).
- IN007/19 – NSW/ACT RMP Clause 7.2.1 does not have a clear time for the cancelled or accelerated transfer actions to occur whereas the other jurisdictions do. This was raised by AGL as part of the gas day harmonisation consultation (IN002/16).
- IN008/18 - All jurisdiction RMPs state that AEMO can submit a Meter Installation Registration Number (MIRN) discovery request however the method and format isn't specified in any Technical Protocol (TP). This was raised by AEMO.
- IN009/15 - Include defined terms for National Energy Retail Law (NERL) if they are mentioned in RMPs. This was raised by AGL as part of New South Wales / Australian Capital Territory Retail Gas Project (NARGP).
- IN009/17 and IN015/15 - Add a clause 4.2A (Re-energisation of Distribution Supply Points) to align with Qld and Vic. See Qld clause 2.9.5A. This was raised by Red/Lumo as part of minor changes to the gas RMP to support harmonisation (IN027/14).
- IN009/20 - Appendix D (The Low Volume Interface) of the FRC B2M-B2B Hub System Specifications need to be amended to say, "WA only". This was raised by AEMO.
- IN010/15 - Recommend removal of the word 'calendar' before 'day' as it causes confusion about the definition of 'day' which is currently undefined. This was raised by Red/Lumo and Energy Australia as part of NARGP.
- IN013/15 - AEMO introduced the defined term "Prospective FRO (Financially Responsible Organisation)" in NSW/ACT. This is a term not used in other jurisdictions. For consistency AEMO



proposed to also add this definition in VIC and QLD. This was raised by Red/Lumo and Energy Australia as part of NARGP.

- IN016/20 - The old version of the SA RMP clauses 220(2), 221, 222 and 223(1) contained formulas however these formulas haven't been included clauses 8.6.2(b), 8.6.3, 8.6.4 and 8.6.5(a). This was raised by AEMO.
- IN003/21 – Further minor changes identified during the pre-consultation stage for IN004/17. These minor changes and involve harmonising the following definitions: Discovery Address; MIRN; MIRN Discovery; MIRN Discovery Response; and Pressure Correction Factor. Further changes include deleting the transitional provisions for gas day harmonisation and including a sentence that explains when a version of the RMP is applicable.

Anyone wishing to make a submission for this final stage consultation stage are requested to use the response template provided in Attachment A. Submissions close 16 March 2021 and should be e-mailed to grcf@aemo.com.au.

IMPORTANT: The scope of works is limited to the 15 initiatives described above. The scope does not include WA. The scope maybe expanded to pick up other minor typographical errors that are identified. A holistic review of all clauses for every jurisdiction's RMP is out of scope for this consultation.

2. REFERENCE DOCUMENTATION

Attachment A is a combined information / participant response template. Part A of Attachment A is seeking feedback on the boarder aspects of this proposal.

For each of the initiatives described in section 1 of this IIR, the following information is provided in Part B of Attachment A:

- Issue number and a brief description of the proposed change and if applicable, includes the participant organisation that raised this proposal and the originating consultation that identified the issue.
- If applicable, the specific jurisdiction's RMP that AEMO used as baseline to prepare the proposed changes to harmonise with the other jurisdictions. This also includes a reference to the clause / section number.
- A list of which RMPs or TPs that have been amended. This also includes a reference to the clause / section number.
- For each RMP or TP that are proposed to be amended, a participant response / comment section is included. This section is shaded in **yellow**. Participants are requested to provide their feedback on each of the proposed changes in this section.
- The feedback AEMO received from participants during the Gas Market Issue (GMI) consultation stage. This section is shaded in **Blue**. This also includes AEMO responses to any feedback that was received.
- The feedback AEMO received from participants during the PPC consultation stage. This section is shaded in **Orange**. This also includes AEMO responses to any feedback that was received.
- If applicable, a background section has been included containing information on the originating consultation.
- At the end of Attachment A, there is a general comments section for any additional feedback.



Attachment B contains track-changed for each of the identified RMPs and TPs, which detail all changes (editorial and otherwise). A comment to indicate which Issue Number (IN) the changes pertain to is also provided. The following documents are included in this attachment:

- Ref 1 - Retail Market Procedure (SA) version 18 (marked up)
- Ref 2 - Retail Market Procedure (NSW/ACT) version 26 (marked up)
- Ref 3 - Retail Market Procedure (QLD) version 20 (marked up)
- Ref 4 - Retail Market Procedure (VIC) version 16 (marked up)
- Ref 5 - Retail Market Procedure (WA) version 8¹
- Ref 6 - Participant Build Pack 1 - Table of Transactions version 3.6 (marked up)²
- Ref 7 - Participant Build Pack 1 - CSV Data Format Specifications version 3.4 (marked up)
- Ref 8 - Participant Build Pack 5 - NSW-ACT version 6 (marked up)²
- Ref 9 - Participant Build Pack 6 - NSW-ACT ver 4.0 - (marked up)²
- Ref 10 - FRC B2B System Interface Definitions v4.8 (marked up)²
- Ref 11 - Specification Pack - FRC B2M-B2B Hub System Specifications version 3.9 (marked up)
- Ref 12 – Gas Interface Protocol Victorian ver 24 (marked up)²
- Ref 13 – Gas Interface Protocol Queensland ver 22 (marked up)²
- Ref 14 – Gas Interface Protocol NSW/ACT ver 11 (marked up)²
- Ref 15 - Specification Pack Usage Guide v8.3 (Marked up)²

3. OVERVIEW OF CHANGES

At the Gas Retail Consultative Forum (GRCF) prioritisation session held in September 2019, participants supported AEMO's proposal to collate several minor amendments to the east coast RMPs and TPs into a single consultation. This single consultation initiative (IN004/17) was added to the GRCF 2020 work program. In mid-November 2020, AEMO issued a Gas Market Initiative (GMI) that invited participants to provide feedback by mid-December 2020. A summary of the feedback is noted below.

As outlined in Section 1, this IIR is made up of several existing initiatives, each having their own specific change as described in Attachment A. The changes are mostly minor rewording of some existing clauses so that they use language/terms consistent with that used in other east coast RMPs. It is AEMO's view that none of these changes significantly alter any of the existing obligations placed on participants. Some participants may need to make minor process changes.

It is envisaged that the above should contribute to AEMO's and industry's long-term aim to increase consistency between the regulatory frameworks for all east coast retail gas markets. AEMO is targeting to have the formal consultation processes concluded in early 2021 with the proposed amendments to come into effect in late April 2021.

¹ This is a reference only. There are no changes proposed in the RMPs for WA.

² These documents do not include the changes that are part of the Q4 2021 bundled release program of work



4. LIKELY IMPLEMENTATION EFFECTS AND REQUIREMENTS

Since all changes with a material impact on the market or IT system have been excluded from this consultation, there should be minimal implementation requirements for participants or AEMO as a result of this consultation. Some participants may need to make minor process changes.

5. OVERALL COST AND BENEFITS

As part of the first-round consultation (PPC), AEMO put forward the following assessment regarding the overall costs and benefits:

AEMO expects there will be negligible implementation costs since none of the changes proposed in this PPC require system changes or substantial process changes and considers this change to be non-controversial. If a participant believes that any of the proposed changes are controversial, this feedback needs to be included in the Attachment A response template.

The benefits are intangible in nature and are likely to be realised as follows:

- *increased consistency within the retail gas regulatory framework;*
- *more uniform RMP across all jurisdictions will reduce the complexities normally associated with entering gas retail markets, particularly for those retailers wanting to operate in more than one jurisdiction; and*
- *increased readability of the RMPs.*

No participant put forward any opposing views in relation to AEMO assessment of the costs and benefits during the first-round consultation. AEMO is still of the view that its original assessment is accurate and there would be only negligible implementation costs since none of the changes proposed in this IIR require system changes or substantial process changes. The overall industry benefits will outweigh the minor cost that participants may incur.

6. MAGNITUDE OF THE CHANGES

AEMO considers the order of magnitude of this change is 'non-material'.

7. AEMO'S PRELIMINARY ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH SECTION 135EB:

As part of the first-round consultation (PPC), AEMO put forward the following assessment regarding compliance with section 135EB of the National Gas Rules:

Consistency with National Gas Law (NGL) and NGR

AEMO's view is that the proposed change is consistent with the NGL and NGR because the proposed change promotes consistency across the four east coast jurisdictions.

No participant raised any objections during the pre-consultation process to the proposal's consistency with any of these documents.



<i>National Gas Objective</i>	<i>As outlined in Section 6, it is AEMO's view that this change removes any costs associated with unnecessary differences in process and procedures and is in the long-term interests of consumers as it promotes clarity and consistency for gas retail market participants.</i>
<i>Any applicable access arrangements</i>	<i>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.</i>

No participant submitted any opposing views in relation to AEMO's assessment during the first-round consultation. AEMO therefore maintains its original assessment as described above.

8. CONSULTATION FORUM OUTCOMES

On 20 January 2021 AEMO published on its website a PPC that put forward changes to several documents described in Attachment B. The proposed changes involve minor changes to the Retail Market Procedures (RMP) and Technical Protocols (TP) to progress industry's broader program of work to harmonise the various jurisdictional retail documentation wherever possible. Registered participants and interested stakeholders were invited to make submissions which closed on 8 February 2021. Submissions were received from Multinet, AGL, Red/Lumo and AGN. All submissions were supportive of the proposed changes. Red/Lumo and MultiJet's feedback contained additional minor suggestions to further improve the redrafting of specific clauses.

See Attachment A for further information on the feedback received and AEMO's response to any specific issues or suggestions that were raised.

IMPACT & IMPLEMENTATION REPORT – RECOMMENDATION(S)

9. SHOULD THE PROPOSED PROCEDURES BE MADE?

AEMO recommends making the changes proposed in Attachment B.

10. PROPOSED TIMELINES

Subject to all necessary approval's AEMO is targeting to implement this change on 30 April 2021.

In order to achieve this timeline, AEMO proposes the following key milestones:

- Issue Impact and Implementation Report (IIR) on 15 February 2021
- Submission on IIR close 16 March 2021
- Issue AEMO decision 1 April 2021



ATTACHMENT A – INFORMATION / PARTICIPANT RESPONSE TEMPLATE

A response template has been attached separately to this document. This template also included feedback received during the pre-consultation stage. Anyone wishing to make a submission to this first stage consultation are to use this response template. Submissions close 16 March 2021 and should be emailed to grcf@aemo.com.au.



ATTACHMENT B – DOCUMENTATION CHANGES

Draft versions of the RMPs and TPs showing tracked changes between the current version and the proposed changes are attached separately to this document. Blue underline means addition and ~~red strikethrough~~ means delete.

