

14 May 2021



Ms Nicola Cusworth  
Economic Regulation Authority  
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PERTH BC WA 6849

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Dear Ms Cusworth

### **Approval of amendment to the Retail Market Scheme – Procedure Changes IN018/20.**

Under section 11ZOL of the *Energy Coordination Act 1994* (the “Act”), the members of an approved Retail Market Scheme may prepare an amendment to their Retail Market Scheme (the “Scheme”) and submit the amendment to the Economic Regulation Authority (“ERA”) for approval.

The framework for the ERA to review and approve amendments to the Scheme is provided in section 11ZOM of the Act. The Scheme is defined to include, amongst other things, the Australian Energy Market Operator (“AEMO”), Retail Market Procedures Western Australia (“RMP WA”), AEMO Specification Pack and Full Retail Competition (FRC) Hub Operational Terms and Conditions. As the formal entity for the Scheme, AEMO is applying to the ERA on behalf of the members for three amendments to the Scheme as described in **Attachment A**.

### **Background**

The RMP WA set out the procedure change process that AEMO must follow before submitting changes to the ERA. AEMO has applied this process, which assisted AEMO and relevant stakeholders in developing the following amendments:

- IN018/20 (Residual changes for 2021 bundled release)

These amendments were finalised by AEMO on behalf of stakeholders when it published the final Impact and Implementation Report (IIR) on 5 March 2021.

The consultation that underpins the procedure change process determined that the amendments for all three changes were “material” given that they require IT-system changes for participants and for AEMO.

As per clause 383(1) of the RMP WA, each participant, pipeline operator, prescribed person and interested person was invited to submit written comments on the proposed amendments. Submissions closed on 9 April 2021. All submissions supported all the proposed changes.

AEMO has decided to submit the amendments to the ERA for approval as endorsed procedure changes. Please refer to **Attachment D** for the IIR.

## **Amendments to the Scheme for ERA consideration**

**Attachment A** contains a summary of each amendment and includes a description on what artefact under the Scheme is changing; the actual changes (in “track change” mode); and any additional relevant information that is not covered in the IIR.

Section 11ZOO (1) and (2) of the Act specifies the criteria that the ERA is to consider in determining whether to approve an amendment to the Scheme. Accordingly, **Attachment B** sets out the rationale for why the proposal meets Scheme change requirements under the Act.

AEMO believes that no further amendments are required based on participant feedback to the IIR as described in **Attachment C**. Further, AEMO believes that the details contained in this application satisfy the criteria under Section 11ZOO that will enable the ERA to consider the amendments.

In accordance with clause 383(4) of the RMP WA, AEMO must provide information to stakeholders about how to make submissions to the ERA on endorsed procedure changes, including a closing date for any ERA submissions. Ms. Lipakshi Dhar from the ERA has provided AEMO with this information, which includes advice that submissions to the ERA will close on 25 June 2021.

Upon sending this application, AEMO will publish this material on its website and include information on how to make submissions to the ERA.

Should the ERA approve the endorsed procedure changes, AEMO proposes to implement the changes related to IN018/20 to take effect on 29 November 2021. AEMO requests that the ERA consider, endorse, and publish the approval for these changes by 30 July 2021.

If you require any further information or if have any questions in relation to this application, please contact Arjun Pathy at [arjun.pathy@aemo.com.au](mailto:arjun.pathy@aemo.com.au).

Yours sincerely

Ms Violette Mouchaileh  
**Chief Market Services Officer**

## **ATTACHMENT A – Summary of Amendments**

### **IN018/20 – Residual changes for 2021 bundled release**

1. This proposed change involves a number of minor amendments to Technical Protocol (TP) documents in preparation for the 29 November 2021 IT gas retail release. The full list of changes is detailed in Section 3 of the attached IIR.
2. The Scheme documents requiring amendment are the:
  - B2B Service Order Specifications - Part 1
  - B2B Service Order Specifications - Part 2
  - Specification Pack FRC B2B System Interface Definitions
  - Specification Pack User Guide

**ATTACHMENT B – Rationale for proposal IN018/20’s meeting the requirements for RMP changes under the Act**

IN003/20W

Section	Requirement	AEMO Comment
11ZOO(1)	The Authority may approve an amendment to the Scheme if it is satisfied that:	
	(a) if the amendment is made, the provisions of the Scheme:	
	(i) will comply with the Act; and	The Scheme, in its initial form, was approved by the Minister for Energy; and all amendments to the Scheme since its initial approval have been approved by the Authority, in accordance with the Act. As a result, the Scheme, in its current form, clearly complies with the Act.  AEMO’s assessment in the IIR was that the changes do not contravene any applicable laws (including the Act), and no participant disputed this assessment in their feedback to the IIR. AEMO is therefore of the view that the Rules will continue to comply with the Act if the procedure change proposal IN018/20 is approved.
	(ii) be suitable for the purposes of section 11ZOB;	Section 11ZOB indicates that the purpose of the Scheme is to ensure that the retail gas market is regulated and is operated in a manner that is: (a) open and competitive; (b) efficient; and (c) fair to gas market participants and their customers.  Procedure change proposal IN018/20 proposes a number of functional or editorial edits to ensure that changes already approved by the ERA in 2020 will work efficiently and to ensure the documentation will be clear for participants. As such, AEMO believes the proposal will improve efficiency in the WA gas retail market. Further, since the proposal applies equally to all WA gas retail market participants, AEMO’s assessment in the IIR was that the proposal is fair to gas market participants and their customers and does not impede openness or competition.  No participant disputed this assessment in their feedback to the IIR. As such, AEMO believes that the proposal is suitable for the purposes of section 11ZOB.
(b) any other principle, criterion, or requirement that is prescribed for the purposes of this paragraph has been met.	AEMO is not aware of any regulations under section 11ZOO(b), so this section of the Act is not applicable.	

Section	Requirement	AEMO Comment
11ZOO(2)	<p>The Authority may approve an amendment to the Scheme under section 11ZOM only if it is satisfied that the consultation required by section 11ZOL(3) has taken place and:</p> <p>(a) each person required to be consulted has agreed to the amendment; or</p> <p>(b) if any person required to be consulted has not so agreed, that person has been given a reasonable opportunity in the course of consultation to provide reasons for not agreeing, and any reasons so provided have been considered.</p>	<p>The proposed amendment to the Scheme has been consulted in accordance with procedure change process of the RMP WA.</p> <p>AEMO commenced consultation for IN018/20 by publishing the Proposed Procedure Change (PPC) and inviting registered participants and interested stakeholders to make submissions. AEMO received submissions from AGL, Alinta Energy, Origin Energy, Simply Energy, and Synergy. All submissions supported the proposal and some submissions requested a number of minor editorial changes, most of which AEMO adopted. AEMO subsequently published the Impact and Implementation Report (IIR). AEMO received submissions to the IIR consultation from AGL, Alinta Energy, and Origin Energy. All submissions supported the proposal and some submissions requested a number of minor editorial changes, most of which AEMO adopted (more information on AEMO's responses to these editorial changes can be found in Attachment C).</p> <p>As a result, AEMO submits that it has met all consultation requirements for the amendments proposed in IN018/20 and that each person required to be consulted with has agreed to the amendment.</p>

## ATTACHMENT C – SUBMISSIONS TO IIR FOR IN018/20

Please note: consultation IN018/20 was conducted simultaneously with a related change for east-coast jurisdictions. Responses to the east-coast consultation have been removed; as such, the item numbers for the responses are not in order.

### Section 1 - General Comments on the Impact and Implementation Report (IIR).

Topic	Item#	Who	Response Received	AEMO response
General Comments on the Impact and Implementation Report.				
<p>Sections 1 to 9 of the IIR sets out details of the proposal.</p> <p>Does your organisation support AEMO's assessment of the proposal (i.e. does your organisation believe that AEMO has adequately described the requirements and surrounding context 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>	1	AGL	AGL broadly supports AEMO's assessment.	AEMO notes AGL's support.
	3	Alinta Energy	Following on from the PPC consultation for IN018/20 concerning the tidy-up of technical documentation related to the Q4 2021 bundled program of work, Alinta Energy agrees with the consolidation of the additional changes into a final set of Technical Protocol (TP) documents, as proposed in this IIR.	AEMO notes Alinta Energy's support.
	5	Origin Energy	Please refer to below section 3 where Origin is seeking clarification or recommending updates to relevant documents for completeness.	AEMO has given its responses below.



Section 2 – Comments on the changes described in Section 3 of the Impact and Implementation Report

Section of IIR	Item #	Who	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
Section 3.1: Delete T71 transaction	7	AGL	AGL supports this decision		AEMO notes AGL's support.
	10	Origin Energy	Origin notes AEMO decision to remove Transaction 71		AEMO notes Origin's comment.
Section 3.2: Delete T72 "Update to Meter Route" transaction	11	AGL	AGL supports this decision		AEMO notes AGL's support.
Section 3.3: Add event codes for CDN/CDR	13	AGL	AGL supports this decision		AEMO notes AGL's support.
Section 3.4: Reword clause 4.6.2	15	AGL	AGL supports this decision		AEMO notes AGL's support.
Section 3.5: Align data dictionary with aseXML schema	17	AGL	AGL supports this decision		AEMO notes AGL's support.
	19	Origin Energy	Notes- changes incorporated by AEMO to make wording clearer		AEMO notes Origin's comment.
Section 3.6: Manifest errors and other non- controversial changes	20	AGL	AGL supports this decision		AEMO notes AGL's support.

Section 3.7: Diagram changes	22	AGL	AGL supports this decision		AEMO notes AGL's support.
Section 3.8: CustomerTitle element	24	AGL	AGL supports this decision		AEMO notes AGL's support.



Section 3 – Corrections to typographical or administrative errors in collating the documents

Ref #1 – B2B Service Order Specifications – Part 1					
Item #	Who	RMP Clause #	Issue / Comment	Proposed text <u>Red strikeout</u> means delete and <u>blue underline</u> means insert	AEMO Response
26	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.
28	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #1, which concern the new Job Enquiry Codes (JECs).		AEMO notes Alinta Energy's support for the proposed changes in this TP document.
29	Origin Energy	Pt 1 Job Enquiry Codes – Data Elements	<p>Origin recognises that event codes for PRE and DMS are not in B2B Service Order Specifications – Part 1 (pg 5).</p>  <p>However PRE and DMS information is contained within B2B Service Order Specifications – Part 2 and PBP1.</p>  <p>Confirmation is requested on use of the data elements for PRE and DMS is as per process flow table, Service order priority A-K</p>		AEMO notes that the B2B Service Order Specifications – Part 2 and the FRC B2B SID contain the relevant information for SA participants.

## Ref #2 – B2B Service Order Specifications – Part 2

30	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.
31	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #2, which concern the new JECs.		AEMO notes Alinta Energy's support for the proposed changes in this TP document.

## Ref #3 – Spec Pack FRC B2B System Interface Definitions

32	AGL	CI 4.6.2	Table below fig 470 Delete "/" as well as CSVcustomer	<table border="1"> <thead> <tr> <th>ID</th> <th>ASEXML TRANSACTION</th> <th>FROM OBJECT</th> <th>TO OBJECT</th> <th>PROCESS FLOW</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>CustomerDetailsNotification <del>CSVCustomer</del></td> <td>Retailer</td> <td>FRC Hub</td> <td></td> </tr> <tr> <td>2</td> <td>CustomerDetailsNotification <del>CSVCustomer</del></td> <td>FRC Hub</td> <td>Network Operator</td> <td></td> </tr> </tbody> </table>	ID	ASEXML TRANSACTION	FROM OBJECT	TO OBJECT	PROCESS FLOW	1	CustomerDetailsNotification <del>CSVCustomer</del>	Retailer	FRC Hub		2	CustomerDetailsNotification <del>CSVCustomer</del>	FRC Hub	Network Operator		AEMO has made the requested change.
ID	ASEXML TRANSACTION	FROM OBJECT	TO OBJECT	PROCESS FLOW																
1	CustomerDetailsNotification <del>CSVCustomer</del>	Retailer	FRC Hub																	
2	CustomerDetailsNotification <del>CSVCustomer</del>	FRC Hub	Network Operator																	
33	AGL	CI 4.6.2.1 Trigger (b)	In both SA and WA the retailer responds to a CDR with a CDN, but in WA only, the retailer does not initiate a CND to the DB on change of details.	<p>Suggest redraft to:</p> <p>This interface is triggered:</p> <p>(a) when a Retailer makes a change to a MIRN's Customer details (for SA <u>only</u>)</p> <p>(b) in response to a CustomerDetailsRequest from the Network Operator <u>(for WA only)</u></p>	AEMO has made the requested change and has made the corresponding change to the PBP3.															
34	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #3.		AEMO notes Alinta Energy's support for the proposed changes in this TP document.															
35	Origin Energy	4.7.3 Life Support Notification (T82 and T83)	<i>TRANSACTION DEFINITION TABLE CROSS-REFERENCE</i> Transaction acknowledgment event codes in the procedures are blank or please clarify where these are located?		There are no transaction acknowledgement specific event codes for LSN and LSR in the proposed RMP, since there are none in the electricity transactions on which the gas LSN and LSR are based. Therefore, AEMO has clarified the RMP changes to note that															

					there are no transaction acknowledgement specific event codes.
36	Origin Energy	4.6.3 Customer Details Request	<i>TRANSACTION DEFINITION TABLE CROSS-REFERENCE</i> Event code 3690 looks incorrect, this is because a CDR would not be required to send fields like phone numbers. It's only a request and only applicable for CDN. The CDR event code should be 3689 (Participant is not authorised to request the received data).	<del>3690</del> <a href="#">3689</a>	AEMO has made Origin Energy's suggested change; the event code, as identified by Origin, should be "3689" (and was drafted correctly in the PBP3), so AEMO has aligned the SID to the PBP3.
<b>Ref #4 – Gas Interface Protocol (NSW-ACT)</b>					
37	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.
38	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #4 to the Version Release date and the effective date.		AEMO notes Alinta Energy's support for the proposed changes in this TP document.
<b>Ref #5 – Gas Interface Protocol (Queensland)</b>					
39	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.
40	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #5 to the Version Release date and the effective date		AEMO notes Alinta Energy's support for the proposed changes in this TP document.
<b>Ref #6 – Gas Interface Protocol (Victoria)</b>					
41	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.

42	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #6 to the Version Release date and the effective date		AEMO notes Alinta Energy's support for the proposed changes in this TP document.								
<b>Ref #7 – PBP 1 – Process Flow Diagrams</b>													
43	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.								
44	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #7 concerning CDN and CDR.		AEMO notes Alinta Energy's support for the proposed changes in this TP document.								
<b>Ref #8 – PBP1 – Process Flow Table of Transactions</b>													
45	AGL	PBP1-Elements Row 150	Information on providing a single named individual per schema requirements is not shown.	Suggest adding: <a href="#">Where the person has a single name, that information should be provided in the Family Name field.</a>	Row 150 relates to Last Modified Date Time and therefore has no information regarding naming conventions.								
46	AGL	PBP1-Elements Row 150	Information regarding Last Modified Date Time is incorrect for a date time field.  The transaction element used in the CDN and LSN for electricity require the use of a DATETIME field for last Modified Date Time, as has been specified in the SA/WA FRC System Definition document.  The PBP1 definition is manifestly incorrect.	Information from Electricity B2B {Procedure Customer and Site Details Notification Process  Information from FRC B2B System Definitions  Attributes: Date Time; Length = 25; Definition = ccy-MM-ddThh:mm:ss+hh:mm	<table border="1"> <tr> <td><b>LastModifiedDateTime</b></td> <td><b>DATETIME</b></td> <td><b>M</b></td> <td><b>Date and time that the record was updated in the Initiator's system.</b></td> </tr> <tr> <td></td> <td></td> <td>determine whether the supplied data is the latest information</td> <td>(see 'time format' Section 4 – introduction.)</td> </tr> </table>	<b>LastModifiedDateTime</b>	<b>DATETIME</b>	<b>M</b>	<b>Date and time that the record was updated in the Initiator's system.</b>			determine whether the supplied data is the latest information	(see 'time format' Section 4 – introduction.)
<b>LastModifiedDateTime</b>	<b>DATETIME</b>	<b>M</b>	<b>Date and time that the record was updated in the Initiator's system.</b>										
		determine whether the supplied data is the latest information	(see 'time format' Section 4 – introduction.)										

					AEMO has made the proposed change.
47	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #8.		AEMO notes Alinta Energy's support for the proposed changes in this TP document.
<b>Ref #9 – PBP 1 - CSV Data Format Specification</b>					
52	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.
53	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #9 which delete the six-monthly refresh of customer details.		AEMO notes Alinta Energy's support for the proposed changes in this TP document.
<b>Ref #10 – PBP3 – B2B System Interface Definitions</b>					
54	AGL	CI 4.6.2.1	Transaction Data Elements Amend transaction title for customer detail notification – delete /CSVCustomer	<del>CUSTOMERDETAILSNOTIFICATION/ CSVCUSTOMER</del>	AEMO has made the proposed change.
55	AGL	CL 4.6.3	Typo – Transaction Table - Post Conditions	Typo  Retailer issues updated customer details via the CDN <b>transaction</b> . – transation to transaction	AEMO has made the proposed change.
56	AGL	CI 4.7.2 (a)	The Victorian derogation applies to retailers not distributors. In Vic only current retails can initiate LSNs.	Clarify usage for prospective Retailer  <b>a) The initiator of the LifeSupportNotification can be a Current Retailer, prospective Retailer</b>	AEMO has amended the clause to read:  The initiator of the LifeSupportNotification can be a Current Retailer (in all jurisdictions), prospective

				(in jurisdictions other than VIC) or (in jurisdictions other than VIC) a Distributor.	Retailer (in jurisdictions other than VIC) or a Distributor (in all jurisdictions).
57	AGL	CL 4.7.2 (f)	The Victorian derogation applies to retailers not distributors.  In Vic only current retailer can initiate LSNs.	Clarify usage for prospective Retailer  f) Where the prospective Retailer (in jurisdictions other than VIC) has provided a LifeSupportNotification to the Distributor and life support registration is no longer required: i. The prospective Retailer must send the Distributor an updated LifeSupportNotification and ii. The Distributor may update their records accordingly.	AEMO has made the proposed change.
58	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #10.		AEMO notes Alinta Energy's support for the proposed changes in this TP document.
59	Origin Energy	4.7.2  Life Support Notification (T80 and T81)	TRANSACTION DEFINITION TABLE CROSS-REFERENCE  Transaction acknowledgment event codes in the procedures are blank or please clarify where these are located?		See AEMO's response to Ref #35.
60	Origin Energy	<u>PB3</u>  Customer Details Notification (4.6.2.1)  Customer Details Request (4.6.3)	Origin recognises that AEMO have lined up the CDN and CDR event codes that are in use for electricity B2B transaction. This is specifically detailed in the IIR s3.3 where event codes 201 and 202 are included in the existing event code table.  We note that in the PPC feedback, Simply Energy called out that '201' and '202' are not updated in PBP3 and SA/WA FRC B2B SID.	<u>PB3</u>  Customer Details Notification (4.6.2.1)  (Also the generic event codes 3603, 3659, 3662, 3673 , <a href="#">201</a> , <a href="#">202</a> can be used)  Customer Details Request (4.6.3)  (Also the generic event codes 3603, 3659, 3662, 3673 , <a href="#">201</a> , <a href="#">202</a> can be used)	AEMO will not be making Origin's proposed change.  The PBP3 currently contains several mentions to "generic event codes", and all such mentions only list 3603, 3659, 3662, and 3673 (see, for instance, "Meter Data Response" in Section 4.1.2.2). As such, in order to maintain consistency with the rest of the RMP, AEMO will only

		<p>and <u>FRC B2B</u> <u>SID</u></p> <p>Customer Details Notification (4.6.2.1)</p> <p>Customer Details Request (4.6.3)</p>	<p>AEMO's response was that 201, and 202 are listed on page 125 of PBP 2.</p> <p>As these are standard event codes within PBP 2 we undertake that participants are to include the 201, 202 event codes for CDN and CDR.</p> <p>For avoidance of doubt, Origin recommends these are specifically added to PB3 4.6.2.1, 4.6.3 and within the FRC B2B System Interface Definition 4.6.2.1, 4.6.3.</p>	<p><u>FRC B2B SID</u></p> <p>Customer Details Notification (4.6.2.1)</p> <p>Also the generic event codes 3603, 3659, 3662, 3673, , <a href="#">201, 202</a> can be used</p> <p>Customer Details Request (4.6.3)</p> <p>(Also the generic event codes 3603, 3659, 3662, 3673, <a href="#">201, 202</a> can be used)</p>	<p>make reference to these four event codes under "generic event codes".</p>
<b>Ref #11 – PBP5 – NSW-ACT Specific Build Pack</b>					
61	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.
62	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #11		AEMO notes Alinta Energy's support for the proposed changes in this TP document.
63	Origin Energy	Appendix H (JEC completion code Mapping)	Participant PB5 PRE completion codes is inconsistent with: Ref 2. B2B service order spec. and Ref 8 BP1 Process flow table of transactions v3.7 Completion Code Completed 10-78 and 22-78 missing from Build Pack 5.	<p>Include:</p> <p><a href="#">10-78</a></p> <p><a href="#">22-78</a></p>	AEMO has made the requested change.
<b>Ref #12 – PBP6 – NSW-ACT (Wagga Wagga and Tamworth)</b>					

64	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.
65	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #12.		AEMO notes Alinta Energy's support for the proposed changes in this TP document.
Ref #13 – Specification Pack Usage Guide					
66	AGL		No comment		AEMO notes that AGL provides no comment on the proposed changes for this TP document.
67	Alinta Energy		Alinta Energy supports the proposed amendments in Ref #13.		AEMO notes Alinta Energy's support for the proposed changes in this TP document.



**ATTACHMENT D – IIR for IN018/20**

Enclosed with this application.

**ATTACHMENT E – Track-changed version of Scheme documents**

Enclosed with this application.