

Issue number IN018/20

Impacted jurisdiction(s) New South Wales-Australian Capital Territory

Queensland

South Australia

Victoria

Western Australia

Proponent Arjun Pathy Company **AEMO**

Retail **Consultation process** Ordinary Affected gas market(s)

(ordinary or expedited)

GRCF Thursday, 18 February Industry consultative Date industry

forum(s) used consultative forum(s) 2021

consultation concluded

Short description of change(s)

documentation impacted

Residual tidy-up for Q4 2021 gas retail market release

Procedure(s) or See Section 2

Consolidate the changes resulting from the suite of consultations involved in the Q4 Summary of the change(s)

> 2021 gas retail market system release into a single set of Technical Protocol documents and effect a number of residual changes resulting from those

> > concludes

consultations

IIR prepared by Arjun Pathy Approved by Michelle Norris

Date IIR published 5 March 2021 Date consultation 9 April 2021

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responses

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information





IMPACT & IMPLEMENTATION REPORT

CRITICAL EXAMINATION OF PROPOSAL

1. DESCRIPTION OF ISSUE

1.1. Background

Across 2020, AEMO consulted on the following initiatives relating to the adoption of aseXML schema version r40 in Q4 2021 by all AEMO-administered gas retail markets¹:

- IN003/20 (Gas Life Support)
- IN011/20 (CDN and CDR)
- IN003/20W (CDN and CDR in WA)
- IN002/15W and IN026/15 (New JECs)
- IN009/19W and IN010/20W (Add Meter Status to WA gas retail transactions)

During these consultations, a number of additional changes emerged that were out-of-scope for those consultations, or were raised too late in the consultation to be addressed. As such, AEMO "parked" these changes to be consulted on as part of this consultation IN018/20.

Additionally, these consultations often based their "track changes" on the current versions of the technical protocol (TP) documents, so the changes have not been collated into a final set of TP documents. This consultation IN018/20 is therefore designed to collate all previously agreed changes into a final set of TP documents.

The changes described in the above list of initiatives, including the adoption of aseXML schema version r40 in Q4 2021, have been approved by AEMO and the Economic Regulation Authority $(WA)^2$.

1.2. Submission details and key feedback areas

This IIR is designed to ensure that AEMO has adequately addressed concerns raised during the consultations listed in Section 1.1. The scope of this IIR is limited exclusively to the changes outlined in Section 3. Any new changes and concerns raised will not be considered as part of this consultation. As such, AEMO seeks feedback from all Retailer and Distributors on the following:

- 1. Whether the changes proposed in this IIR address the technical requirements of the issues outlined in Section 3, and whether your organisation agrees with the marked-up changes to address these issues.
- 2. Whether your organisation believes AEMO has made any typographical or administrative errors in collating the changes listed in Section 1.1 into a final set of TP documents.

Submissions using the response template in Attachment A close Friday 9 April 2021 and should be emailed to grcf@aemo.com.au.

2. REFERENCE DOCUMENTATION

Attachment B provides a cross-reference of the changes listed in Section 3 and the affected TP documents.

¹ Links to the relevant consultation pages is provided for participants' reference.

² The Economic Regulation Authority (WA) only approved IN003/20W, IN002/15W, IN009/19W and IN010/20W. This included the adoption of aseXML schema version r40 in Q4 2021.





Attachment C contains each TP document showing tracked changes between the current version and the proposed changes.

2.1. Technical Protocol (TP) documentation

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

Attachment C contains each TP document showing tracked changes between the current version and the proposed changes.

OVERVIEW OF CHANGES

3.1. Delete T71 transaction (east-coast only)

Consultations IN011/20 and IN003/20W require all AEMO-administered gas retail markets to adopt versions of the CustomerDetailsNotification (CDN) and CustomerDetailsRequest (CDR) transactions with an aseXML payload, which will be transactions T70 and T72 in the Table of Transactions. In east-coast gas retail markets, there is currently also the T71 transaction (Amend Customer Details Six Monthly Refresh), which is used to provide a bulk CDN to the Distributor every six months. Transaction T71 is not currently used in WA. Since T71 is a non-aseXML transaction, the details about this transaction are listed in Participant Build Pack 1 - CSV Data Format Specification.

In feedback to the Proposed Procedure Change (PPC) for IN011/20, AGL noted that the T71 transaction would become obsolete given the new aseXML transactions and should accordingly be removed³. AEMO noted in its response that removing T71 would be out of scope for consultation IN011/20 and further that participants had not been given an opportunity to consider the proposed change, and that the change would therefore be included in consultation IN018/20.

The TP documents finalised as part of IN011/20 (CDN and CDR in east-coast jurisdictions) and IN003/20W (CDN and CDR in WA) state that the Retailer should send a CDN whenever the customer requests a change to customer details or whenever the customer details change. As such, AEMO proposed as part of the PPC for this consultation IN018/20 that there is no need for a "six monthly refresh" transaction, since the customer details should already be up to date.

All responses to the PPC supported AEMO's proposal to delete the T71 transaction.

3.2. Delete T72 "Update to Meter Route" transaction (east-coast only)

In its investigations as part of IN018/20, AEMO discovered that the Participant Build Pack 3 (Appendix D - Table of Transactions Cross Reference) contains an "Update to Meter Route" transaction under T72, as outlined in the following table.

³ Please see Ref #12 in Attachment D here: https://aemo.com.au/-/media/files/stakeholder-consultations/gas-consultations/2020/in011-20/iir/iir-in011-20-add-cdr-and-cdn-to-gas-market-systems.pdf?la=en





Table 1 Excerpt from PBP 3 Interface Definitions - Appendix D, relevant sections highlighted

TABLE OF TR					
Transaction No	Transaction Type	Comms Type	Transaction	PBP	Section Reference
70	Amend Customer Contact Details	B2B	AmendMeterRouteDetails	3	4.6.2.1
71	Amend Customer Contact Details (six monthly refresh)	Internal	N/A	N/A	N/A
72	Update to Meter Route	Internal	N/A	N/A	N/A

AEMO noted in the PPC for this consultation IN018/20 that it did not believe this transaction was ever implemented in gas retail market systems. No participant disputed this in feedback to the PPC. As such, row 72 as it stands is a manifest error and can be amended without consequence in order to facilitate the implementation of the changes to CDN and CDR (since the proposed Customer Details Request transaction would occupy T72).

As part of the PPC for this consultation IN018/20, AEMO sought participant feedback on whether this amendment of "Update Meter Route" to "Customer Details Request" would impact participants given that the "Update to Meter Route" transaction did not appear to have been implemented.

All responses to the PPC supported AEMO's proposal to amend "Update Meter Route" to "Customer Details Request".

3.3. Add event codes for CDN/CDR (all jurisdictions)

The event codes that are listed for use in the current (i.e. CSV-payload) CDN file⁴ are:

Event Code	Description	Severity	Invoking Transaction
3665	RecordCount element does not match number of records in CSV file	Error	All transactions containing CSV files
3666	Data does not match the CSV format definition	Error	All transactions containing CSV files
3670	Missing mandatory CSV field	Error	All transactions containing CSV files
3672	Invalid data in CSV record	Error	All transactions containing CSV files
3674	Data in CSV record ignored	Error	All transactions containing CSV files
3677	Updated details not valid	Error	AmendMeterRouteDetails

⁴ See, for instance, Table 4.6.2.1 in the PBP 3 B2B System Interface Definitions: https://aemo.com.au/-
/media/files/gas/retail markets and metering/market-procedures/vic/gip/build pack 3/partcipant-build-pack-3-b2b-system-interface-definitions-v37--clean.pdf?la=en





Feedback to the IN011/20 PPC identified that these relate to CSV transactions and therefore need to be replaced for the new aseXML-payload transactions⁵.

In line with the CDN and CDR event codes in use in electricity B2B transactions, AEMO proposes the following event codes for use with the aseXML CDN transaction:

	Event Code	Description
	0	Success, OK, Accepted, etc.
Codes	201	Data missing
Existing Event Codes	202	Data invalid
isting E	3603	Recipient is not responsible for the supplied MIRN
<u> </u>	3659	Unrecognised Event Code
	3662	MIRN checksum invalid
	3673	Invalid data in aseXML field
Proposed New Event Codes to Mirror Electricity	3689	Participant is not authorised to request the received data
Prop. Event Mirror	3690	Data not fit for purpose (i.e. the data is aseXML-compliant but not valid, such as a phone number "02 0000 0000")

The relevant section of Participant Build Pack 3 (PBP3) B2B System Interface Definitions and the SA/WA FRC B2B System Interface Definitions documents have been updated to reflect the above changes.

As part of the PPC for this consultation IN018/20, AEMO sought participant feedback on whether these event codes adequately captured the relevant business events and, if participants wished to propose additional event codes, why these would be needed above and beyond the event codes provided in electricity.

Feedback to the PPC was supportive of the specific event codes proposed (i.e. there were no business events above and beyond those in the above table for which participants believed event codes should be added). Simply Energy raised technical feedback regarding whether event code 3689 should be applicable to "All" transactions or simply to "Request" transactions; AEMO has provided its response to Simply Energy in Ref #22 of Attachment D. AGN noted (see Ref #19 of Attachment D) that event code 3689 needed to be added to CDR; AEMO has accepted that feedback and has further removed event code 3689 as a transaction-specific event code for CDN, since it is not allowed as a transaction acknowledgement specific event code for CDN in electricity, and AEMO's proposal in the PPC was to harmonise with electricity event codes.

⁵ Please see Ref #19 in Attachment D here: https://aemo.com.au/-/media/files/stakeholder_consultation/consultations/gas_consultations/2020/in011-20/iir/iir-in011-20-add-cdr-and-cdn-to-gas-market-systems.pdf?la=en





3.4. Reword clause 4.6.2 (east-coast only)

In feedback to the IN003/20W IIR, the following rewording of clause 4.6.2 was proposed⁶:

In SA the Retailer must provide a CustomerDetailsNotification in response to a valid CustomerDetailsRequest. See section 4.6.3 for further details on CustomerDetailsRequest.

In SA, under the National Energy Retail Rules, the Retailer must:

- (i) Initiate a Customer Details Notification when customer details change.
- (ii) <u>Provide a CustomerDetailsNotification in response to a valid CustomerDetailsRequest. See</u> section 4.6.3 for further details on CustomerDetailsRequest.

Since IN003/20W affected WA only, AEMO agreed to consider the proposal as part of IN018/20 such that the wording could be applied to all east coast procedures.

In the PPC for IN018/20, therefore, AEMO proposed the above change both to the FRC B2B System Interface Definitions (for which the change was originally proposed) as well as for the PBP3 B2B System Interface Definitions for consistency. The rewording reflects diagram 4-63, which was approved by east-coast participants as part of consultation IN011/20. As part of the PPC, AEMO sought feedback on whether any participants objected to this rewording.

All responses to the PPC supported the intent of the rewording, but Red and Lumo Energy noted that the clause as proposed did not reference Victorian regulatory instruments. AEMO has accordingly redrafted the clause to reference Victorian regulatory instruments in order to make clear that the clause applies to all east-coast retail gas markets, including Victoria.

3.5. Align data dictionary with aseXML schema (all jurisdictions)

Feedback provided following the close of the consultations listed in Section 1.1 identified that the "aseXML element name" column in the Data Dictionary of the respective TP documents was not aligned with the aseXML schema files themselves (e.g. "Life Support Phone Number 1" did not have "ManagementContactDetail/ PhoneNumber" listed as its aseXML element). Further, some clarification was needed regarding how certain aseXML schema elements were to be used (e.g. the "ManagementContactDetail" aseXML schema element allows for any number of phone numbers to be provided, but the build pack allows for at most two). As part of the PPC for this consultation IN018/20, therefore, AEMO made a number of amendments to the Data Dictionary appendices in the respective TP documents to align them with the aseXML schema. As part of the PPC AEMO sought feedback on whether these changes accurately reflected requirements.

All responses to the PPC agreed with the intent of the proposal. AGN and Origin Energy raised some technical feedback to clarify the drafting, to which AEMO has agreed (see Ref #30, #31, and #34 in Attachment D).

3.6. Manifest errors and other non-controversial changes

3.6.1. Mandatory status of Life Support fields (east-coast only)

In feedback to the IN011/20 PPC, Multinet Gas Networks noted that the Participant Build Pack 1 Table of Transactions (Elements tab) had incorrectly identified Life Support Contact Name as "Code Used" (i.e. is not

⁶ See Ref #10 in Attachment D here: https://aemo.com.au/-/media/files/stakeholder_consultation/consultations/gas_consultations/2020/in003-20w/iir-in003-20w-wa-cdn-and-cdr.pdf?la=en_





free text) and had incorrectly identified Life Support Equipment as "No Code Used". This was out of scope for IN011/20, so AEMO proposed to address this change as part of IN018/20.

Given that this change corrects a manifest error, AEMO proposed as part of the PPC for this consultation IN018/20 that this change is non-controversial. AGN raised one typographical change; otherwise all responses to the PPC supported AEMO's proposed changes.

3.6.2. Electricity terminology for CDN / CDR allowable values (east-coast only)

Feedback to the IN003/20W PPC in relation to the Specification Pack document FRC B2B System Interface Definitions identified that electricity terminology had been retained under the description of allowable values for the Reason field in CDR (e.g. using "MPB", which stands for "Metering Provider – B", instead of using "Distributor")8. Since this was a WA consultation, AEMO could only make the amendment for WA. AEMO therefore proposed the same amendment for SA in the PPC for this consultation IN018/20. Given the extent of the mark-up required and given that the change corrects a manifest error, this change has not been provided in mark-up.

All responses to the PPC supported AEMO's proposed changes.

3.7. Diagram changes

3.7.1. Reference numbering for PBP 3 B2B System Interface Definitions figure 4.63 (east-coast only)

Feedback to the IN011/20 IIR identified that the reference numbering for figure 4.63 is incorrect—they should match those in the PBP 1 diagram 4.19.

Given that this change corrects a manifest error, AEMO proposed as part of the PPC for this consultation IN018/20 that this change is non-controversial. All responses to the PPC supported AEMO's proposed changes.

3.7.2. CDN aseXML schema diagram (all jurisdictions)

Feedback to the IN011/20 IIR identified that figure 4-65 of the PBP 3 B2B System Interface Definitions needed to be updated to reflect that it no longer has a CSV payload ¹⁰. AEMO identified that this diagram also needs to be updated in the FRC B2B System Interface Definitions.

AEMO sought feedback in the PPC for this consultation IN018/20 on whether the diagram included in the proposed TP documents adequately captures requirements. All responses to the PPC supported AEMO's proposed changes.

Please see Ref #16 and #17 in Attachment D here: https://aemo.com.au/- /media/files/stakeholder consultation/consultations/gas consultations/2020/in011-20/iir/iir-in011-20-add-cdr-and-cdn-to-gas-market-systems.pdf?la=en

⁸ See Ref #13 in Attachment D here: https://aemo.com.au/-

[/]media/files/stakeholder_consultation/consultations/gas_consultations/2020/in003-20w/iir-in003-20w-wa-cdn-and-cdr.pdf?la=en_

⁹ See Ref #17 in Attachment B here: https://aemo.com.au/-

 $[\]underline{/media/files/stakeholder\ consultation/consultations/gas\ consultations/2020/in011-20/notice-of-aemo-decision.pdf? la=ender aemo-decision aemo-decision$

¹⁰ See Ref #28 in Attachment B here: https://aemo.com.au/- /media/files/stakeholder consultation/consultations/gas consultations/2020/in011-20/notice-of-aemo-decision.pdf?la=en





3.7.3. CDR diagram in PBP 1 Process Flow Diagram (east-coast only)

Feedback to the IN011/20 IIR identified that a figure for CDR needs to be added to the PBP 1 Process Flow Diagram¹¹. AEMO also made a number of editorial amendments to clarify the diagram proposed for the CDN transaction.

AEMO sought feedback in the PPC for this consultation IN018/20 on whether the diagram adequately captured requirements. All responses to the PPC supported AEMO's proposed changes.

3.8. NameTitle element (all jurisdictions)

A number of participants who are jointly involved in the GRCF and Electricity Consultative Retail Forum (ERCF) submitted a change request to the ERCF to allow "Null" as a value when entering a customer's title (e.g. "Mr", "Ms", etc.) in the "CustomerName" field for the CDN transaction. AEMO provided advice that, instead of populating this field with "Null", it should be populated with an empty string (i.e. the "NameTitle" field under "CustomerName" should be populated as <NameTitle></NameTitleas this could be implemented without making additional changes to the schema.

To clarify that this was the agreed solution where a customer's title is unknown, AEMO proposed as part of the PPC for this consultation IN018/20 the following changes (in <u>blue underline</u>) to the "CustomerName" row of the Data Dictionary pertaining to PBP 3 B2B System Interface Definitions and Specification Pack document FRC B2B System Interface Definitions documents:

aseXML Element Name	Element Name	Description	Attribut es/ Format	Length/ Decimal Places	Allowed Values
CustomerName	Customer	Must be the name of			Where no title is
	Name	the person who is			available to
		the contact for the			<u>populate</u>
		management of			NameTitle, an
		outages and supply			empty string should
		issues for each			be used to populate
		connection point.			it instead.

AEMO sought feedback on whether this wording adequately captured requirements. All responses to the PPC supported the change.

4. OVERALL COST AND BENEFITS

This consultation does not create any costs for AEMO. Given that the changes from this consultation should already have been costed by participants as part of the consultations listed in Section 1.1, AEMO

¹¹ See Ref #33 in Attachment B here: https://aemo.com.au/- /media/files/stakeholder consultation/consultations/gas consultations/2020/in011-20/notice-of-aemo-decision.pdf?la=en





proposed as part of the PPC for this consultation IN018/20 that this consultation should not create any costs for participants. No participant disputed this assessment in feedback to the PPC.

The benefits of this consultation are that the changes resulting from the consultations listed in Section 1.1 will be collated into a single set of TP documents. Further benefits include the additional clarity provided to the TP documents by the changes listed in Section 3Error! Reference source not found..

Given that there are not expected to be any costs, AEMO proposed in the PPC for this consultation IN018/20 that the benefits outweighed the costs for both WA and for east-coast jurisdictions (i.e. the changes provided a net benefit for industry as a whole). No participant disputed this assessment in feedback to the PPC, so AEMO maintains that this change represents a net benefit for industry as a whole.

MAGNITUDE OF THE CHANGES

As part of the PPC for this consultation IN018/20, AEMO proposed that this change to be non-material given that the changes required for this consultation are already required as part of the consultations listed in Section 1.1. No participant disputed this assessment in feedback to the PPC.

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

As part of the first-round consultation (PPC), AEMO put forward the following assessment regarding compliance with clause 378 of the WA RMP:

Ensure that the retail gas market operates and is governed in a manner that is, (i) open and competitive; (ii) efficient; and (iii) fair to participants and their customers	AEMO's view is that the proposed change will continue to promote competition, will promote efficiency in meter connections and disconnections, and will not disadvantage participants or their customers.
Ensure compliance with all applicable laws	AEMO's view is that the proposed changes are consistent with the applicable laws, and participants will be given an opportunity during this PPC consultation to inform AEMO if they believe the proposed change is in conflict with any applicable laws.
Ensure effective consultation occurs and gives stakeholder's opportunities to provide feedback of the proposed changes	AEMO's view is that this PPC consultation and the subsequent IIR consultation, in addition to the preconsultation GMIs and discussions at the GRCF, will provide adequate opportunities for participants to provide feedback on the proposed changes.

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.

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

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. AEMO also believes that this change is consistent with the National Energy Retail Rules (NERR), the Victorian Energy Retail Code, and the Victorian Gas Distribution System Code. No participant raised any objections during the consultations listed in Section 1.1, and participants will be given an opportunity during this PPC consultation to inform AEMO if they believe there is such an inconsistency.
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 collating the changes from consultations listed in Section 1.1 into one set of documents and by providing clarifications to TP documents.
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 consultations listed in Section 1.1, and participants will be given an opportunity during this PPC consultation to inform AEMO if they believe the proposed change is in conflict with existing Access Arrangements.

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

AEMO received responses from the following organisations, AGL, AGN, Alinta Energy, Multinet Gas, Origin Energy, Red and Lumo and Simply Energy. Responses to the PPC supported the majority of AEMO's proposed changes, and where responses to the PPC queried AEMO's proposed changes, it was generally to clarify the drafting to better reflect drafting intent or to raise typographical amendments. A more fulsome discussion of PPC responses can be found in Section 3 or Attachment D.

9. SUPPORTING DOCUMENTATION

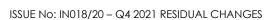
Please see Attachment C for change-marked TPs.

10. SHOULD THE PROPOSED PROCEDURES BE MADE)?

AEMO recommends the changes proposed in Attachment B. This includes a number of editorial or otherwise minor changes put forward during the first-round consultation. These additional changes are described in Attachment D.

11. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO proposes the following timeframe:







- Issue IIR on Friday 5 March 2021.
- IIR feedback due Friday 9 April 2021.
- For east-coast changes, Notice of AEMO Decision issued in May 2021.
- For WA changes, Economic Regulation Authority (ERA) submission issued in May 2021.

The effective date for these changes will be Monday 29 November 2021.





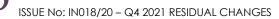
ATTACHMENT A – IIR RESPONSE TEMPLATE

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

- Section 1 seeks feedback on AEMO's examination of the proposal in Sections 1–9 (i.e. whether AEMO has correctly captured the requirements and surrounding context of the proposal).
- Section 2 seeks feedback on the proposed changes listed in Section 3.
- Section 3 seeks feedback on whether AEMO has correctly collated the TP documents from the consultations listed in Section 1.1 (i.e. whether AEMO has made an administrative error in collation; further amendments will not be considered as part of this consultation).
- Section 4 provides an opportunity for participants to raise any additional issues to be addressed as part of a later consultation.

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

Submissions close 9 April 2021 and should be emailed to grcf@aemo.com.au.





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

The following table lists the changes collated under this consultation (along with the relevant section number of this PPC) as well as which TP document they affect. Comments have been added in the draft TP documents to identify these changes and can be found by searching "IN018/20".

	Collation of previous changes	Section 3.1 Delete T71 transaction	Section 3.2 Delete T72 transaction	Section 3.3 Add event codes for CDN/CDR	Section 3.4 Reword clause 4.6.2	Section 3.5 Align data dictionary with aseXML	Section 3.6 Manifest errors	Section 3.7 Diagram changes	Section 3.8 CustomerT itle
Ref #1 – B2B Service Order Specifications – Part 1									
Ref #2 – B2B Service Order Specifications – Part 2									
Ref #3 – Spec Pack FRC B2B System Interface Definitions									
Ref #4 – Gas Interface Protocol (NSW-ACT)									
Ref #5 – Gas Interface Protocol (Queensland)									
Ref #6 – Gas Interface Protocol (Victoria)									
Ref #7 – PBP 1 – Process Flow Diagrams									
Ref #8 – PBP1 – Process Flow Table of Transactions									
Ref #9- PBP 1 - CSV Data Format Specification									
Ref #10 – PBP3 – B2B System Interface Definitions									
Ref #11 – PBP5 – NSW-ACT Specific Build Pack									
Ref #12 – PBP6 – NSW-ACT (Wagga Wagga and Tamworth)									
Ref #13 – Specification Pack Usage Guide									





ATTACHMENT C - DOCUMENTATION CHANGES

Draft versions of the TPs showing tracked changes between the current version and the proposed changes are attached separately to this document. <u>Blue underline</u> means addition and <u>red strikeout</u> means delete.

ATTACHMENT D - FEEDBACK GIVEN TO PPC

Section 1 - General Comments on the Proposed Procedure Change

Topic	Ref#	Participant	Response	AEMO Response
Sections 1 to 9 of the PPC sets out details of the proposal.	1	AGL	The assessment of the proposed changes seems appropriate.	AEMO notes AGL's support of AEMO's assessment.
Does your organisation support AEMO's assessment of the proposal (i.e. does your organization believe that AEMO has	2	AGN	AGN generally supports the proposal.	AEMO notes AGN's support of AEMO's assessment.
adequately described the requirements and surrounding context of the proposal)? If no, please specify areas in which your organisation disputes AEMO's assessment (include PPC section reference number) of	3	Alinta Energy	Alinta Energy agrees with the changes proposed in the PPC for IN018/20, which are concerned with a tidy-up of technical documentation related to the Q4 2021 bundled program of work.	AEMO notes Alinta Energy's support of AEMO's assessment.
the proposal and include information that supports your organisation's rationale for not supporting AEMO's assessment.	4	MGN	MGN supports the proposal	AEMO notes MGN's support of AEMO's assessment.
	5	Origin Energy	Origin has reviewed and provide comment as described in below sections.	AEMO notes that Origin has provided comment as described below, and AEMO has provided its response there.
	6	Red and Lumo	Red Energy and Lumo Energy (Red and Lumo) believe the PPC has adequately covered and addressed the majority of items which were raised. Red and Lumo however are concerned around the changes section 3.4. Reword clause 4.6.2 and the implications for different jurisdictions.	AEMO notes Red and Lumo's support of AEMO's assessment for the majority of items. AEMO has below provided its response to Red and Lumo's concerns regarding Section 3.4.

7	Simply Energy	 Support the deletion of T71 transaction (east-coast) in line with our previous feedback provided during consultation on IN011/20 and IN003/20W (in addition to AGL's feedback). Non-asexml CDN structures should not be maintained once xml based CDNs are implemented. AEMO notes Simply Energy's broad support for AEMO's assessment of the proposal. AEMO has below provided its response to Simply Energy's proposal regarding event codes.
		Support the deletion of T72 "Update to Meter Route" transaction (east-coast)
		 Regarding new Event Codes, Simply Energy suggests that event code '3689' should not be applicable to 'All' transaction but 'Request' transaction types only. Also, codes, '0', '201' and '202' are not updated in PBP3 and SA/WA FRC B2B SID.
		- Supports the rewording of clause 4.6.2 (east-coast) in relevant instruments.
		Support the remainder of changes including data dictionary alignment, manifest error corrections and diagram changes in PBP3 B2B SID.
		 Supports the NameTitle element changes as proposed

Section 2 – Comments on the changes described in Section 3 of the Proposed Procedure Change

Section of PPC	Ref #	Participant	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response
	8	AGL	AGL supports this deletion		AEMO notes AGL's support for the change.
	9	Alinta Energy	Alinta Agrees with the proposed deletion of this transaction.		AEMO notes Alinta Energy's support for the change.
	10	MGN	No issue		AEMO notes MGN's support for the change.
Section 3.1: Delete T71 transaction	11	Origin Energy	In principle Origin acknowledges the removal of Transaction 71 and the requirements for a six-month refresh. Origin is keeping an open mind to feedback participants may have as part of this consultation on the benefits T71 may have for their organisation. Origin will assess this feedback once AEMO prepares the IIR report.		AEMO notes Origin Energy's in-principle support for the change, and given that all other respondents supported the deletion of T71 AEMO will be proceeding with the deletion.
	12	Simply Energy	Supports the deletion of T71 transaction (east-coast) in line with our previous feedback provided during consultation on IN011/20 and IN003/20W (in addition to AGL's feedback). Non-asexml CDN structures should not be maintained once xml based CDNs are implemented.	N/A	AEMO notes Simply Energy's support for the change.
	13	AGL	AGL supports this deletion		AEMO notes AGL's support for the change.

	14	Alinta Energy	Alinta Agrees with the proposed deletion of this transaction.		AEMO notes Alinta Energy's support for the change.
	15	MGN	No issue		AEMO notes MGN's support for the change.
Section 3.2: Delete T72 "Update to Meter Route" transaction	16	Origin Energy	Noted – removal of Transaction 72 and can be amended to implement the changes to CDN and CDR.		AEMO notes that Origin has noted the change.
	17	Simply Energy	Supports the deletion of T72 "Update to Meter Route" transaction (east-coast)		AEMO notes Simply Energy's support for the change.
	18	AGL	AGL Supports this deletion		AEMO notes AGL's support for the change.
18Section 3.3: Add event codes for CDN/CDR	19	AGN	FRC B2B SID v4 4.6.3 Customer Details Request (CDR) Suggest add error code 3689 (Participant is not authorised to request the received data.) Also same for PBP3 B2B SYS INT Def section 4.6.3 (VIC & QLD)		AGL's change aligns with electricity B2B Procedures, so AEMO will proceed with the change. Further, AEMO notes that in electricity the "Participant is not authorised to request the received data" event code is only applicable to CDR, not to CDN; as such, in addition to adding 3689 as a transaction acknowledgement specific event code for CDR, AEMO will remove 3689 as a transaction acknowledgement specific event code for CDN.
	20	Alinta Energy	Alinta agrees with the proposed addition of event codes for CDN/CDR		AEMO notes Alinta's support for the change.
	21	MGN	No issue		AEMO notes MGN's support for the change.
	22	Simply Energy	Regarding new Event Codes, Simply Energy suggests that event code '3689' should not be applicable to 'All' transaction but	3689 Participant is not authorised to request the received data. Error All	As per page 251 of the PBP3, "restricting the application of Event Codes to the nominated invoking transaction only applies to those aseXML transactions specified at market start";

as such, AEMO would not restrict code 3689 'Request' transaction types only. Also, codes, '0', '201' and '202' are to be used only be "Request" transaction In both documents, 'All' should be not updated in PBP3 and SA/WA types. However, code 3689 is only listed under replaced by 'Request transactions only, i.e. FRC B2B SID. "CustomerDetailsNotification" and is not a CDR, SOR, etc.' generic event code, and as such it would not Also, these three codes are not included be permissible to use code 3689 with any but provided in the PPC however these transaction other than CDN. Given this, AEMO can be mapped with existing event codes believes that the TP documents already instead of creating new ones (e.g. 201 = address the issue Simply Energy identifies. 3673, etc.) Codes 0, 201, and 202 are standard event codes and as such are listed on page 125 of Description Event the PBP 2 (as is noted on page 250 of the PBP Code 3). They are already existing event codes. Success, OK, Accepted, etc. AEMO notes that the MeterDataResponse is 201 Data missing outside the scope of this consultation and will 202 Data invalid not be considered in this consultation. Sample XML document refers to 'Invalid NMI Checksum' instead of 'invalid MIRN checksum'.

				XML Sample	
				<header></header>	
				<pre><from description="TXU Retail">TXUR</from></pre>	
				<to description="TXU Networks">TXUN</to>	
				<messageid>TXUR-MSG-4321</messageid>	
				<messagedate>2002-02-14T12:00:00+10:00<td></td></messagedate>	
				<transactiongroup>MDMT</transactiongroup>	
				<market>VICGAS</market>	
				<transactions></transactions>	
				<transaction trans<br="" transactionid="TXUR-TXN-4321">initiatingTransactionID="TXUN-TXN-1234"></transaction>	
				<meterdataresponse version="r6"></meterdataresponse>	
				<activityid>756475</activityid>	
				<a application"="" href="mailto:</acceptedCount>4</acceptedCount></td><td></td></tr><tr><td></td><td></td><td></td><td></td><td><LoadDate>2002-02-14T13:00:00</LoadDate</td><td></td></tr><tr><td></td><td></td><td></td><td></td><td><Event class=" severity="Error">	
				<code>3453</code>	
				<context>6754654368,5,TX364576,SRF</context>	
				<explanation>NMI not known<td></td></explanation>	
				<event class="Application" severity="Error"></event>	
				<code>5463</code>	
				<context>2784756396,4,,,G4657343,</context>	
				<explanation>InvalidNMI Checksum<td></td></explanation>	
	23	AGL	AGL Supports this deletion		AEMO notes AGL's support for the change.
Section 3.4: Reword	24	Alinta Energy	Alinta agrees with the proposed rewording of clause 4.6.2.		AEMO notes Alinta Energy's support for the change.
clause 4.6.2	25	MGN	No issue		AEMO notes MGN's support for the change.
	26	Origin Energy	Origin support the inclusion of this drafting clause to provide clarity.		AEMO notes Origin Energy's support for the change.

	27	Red and Lumo Energy	The PPC seeks to apply this clause for all jurisdictions however the wording in Participant Build Pack 3: B2B System Interface Definitions does not support this. AEMO has referenced the National Energy Retail Rules in this section however Red and Lumo note that the NERR does not apply for Victoria.	Under the National Energy Retail Rules, the Retailer must: (i) Initiate a CustomerDetailsNotification when customer details change. (ii) Provide a CustomerDetailsNotification in response to a valid CustomerDetailsRequest. See section 4.6.3 for further details on CustomerDetailsRequest. Red and Lumo propose that this section be reworded to reference the relevant regulatory instruments for each jurisdiction as necessary.	AEMO has amended the beginning of the clause to read: Under the National Energy Retail Rules (for jurisdictions other than VIC) and the Energy Retail Code (for VIC)
	28	Simply Energy	Supports the rewording of clause 4.6.2 (east-coast) in relevant instruments.	N/A	AEMO notes Simply Energy's support for the change.
	29	AGL	AGL Supports this deletion		AEMO notes AGL's support for the change.
Section 3.5: Align data dictionary with aseXML schema	30	AGN	FRC B2B SID v4 Appendix A. Data Dictionary Element Names: Phone Number 1 Phone Number 2	ALLOWED VALUES While the aseXML schema allows for any number of phone numbers to be provided, at most two must may be provided under the Build Pack constraints.	Please see Ref #34.
	31	AGN	PBP3 B2B SID v3 Appendix A. Data Dictionary Element Names: Phone Number 1	ALLOWED VALUES While the aseXML schema allows for any number of phone numbers to be provided, at most two must may be provided under the Build Pack constraints.	Please see Ref #34.

32	Energy	Phone Number 2 No allowed values listed. Should the same comment as above apply here? No comment No issue		AEMO notes that Alinta Energy has no comment on the change. AEMO notes MGN's support for the change.
34	4 Origin Energy	Origin acknowledges that clarification is needed regarding how certain aseXML schema elements were to be used (e.g. the "ManagementContactDetail" aseXML schema element allows for any number of phone numbers to be provided, but the build pack allows for at most two). Origin recommends a review of the wording proposed in the allowable values within the BP3 B2B Systems Interface definitions and FRC B2B Systems Interface Definitions: For example: -CustomerEmailAddress - ManagementContactDetail/EmailA ddress -ManagementContactDetail/PhoneNumber 1 -ManagementContactDetail/PhoneNumber 2	Below wording is an example for Phone number Allowable values. Similar wording should be in place for other allowable values. While the aseXML schema allows for any number of phone numbers to be provided, at most two must be provided under the Build Pack constraints. While the aseXML schema allows for any number of phone numbers to be provided, a maximum of two is permitted under the Build Pack constraints	AEMO agrees that Origin Energy's changes better reflect the drafting intent and has made changes to the PBP 3 and the B2B System Interface Definitions accordingly.

			The wording states that 'at most" one/two must be provided. This can imply, for example, that at least 2 email address must be provided. It doesn't necessarily read that only up to 2 email address can be provided		
	35	Simply Energy	Support the remainder of changes including data dictionary alignment, manifest error corrections and diagram changes in PBP3 B2B SID.	N/A	AEMO notes Simply Energy's support for the change.
	36	AGL	AGL Supports this deletion		AEMO notes AGL's support for the change.
	37	AGN	3.6.1 Mandatory status of Life Support fields PBP1 Table of Transactions (Elements tab) Life Support Equipment	Code Use column still shows as N (No Code Used), should be Y	AGN is correct in noting that the Code Use column should be "Y"; AEMO has made the requested change.
Section 3.6: Manifest errors and other non- controversial changes	38	Alinta Energy	No comment		AEMO notes that Alinta Energy has no comment on the change.
	39	MGN	No issue		AEMO notes MGN's support for the change.
	40	Simply Energy	Support the remainder of changes including data dictionary alignment, manifest error corrections and diagram changes in PBP3 B2B SID.	N/A	AEMO notes Simply Energy's support for the change.
	41	AGL	AGL Supports this deletion		AEMO notes AGL's support for the change.

	42	Alinta Energy	No comment		AEMO notes that Alinta Energy has no comment on the change.
Codian 2.7. Diamen	43	MGN	No issue		AEMO notes MGN's support for the change.
Section 3.7: Diagram changes	44	Simply Energy	Support the remainder of changes including data dictionary alignment, manifest error corrections and diagram changes in PBP3 B2B SID.	N/A	AEMO notes Simply Energy's support for the change.
	45	AGL	AGL supports this deletion		AEMO notes AGL's support for the change.
	46	AGN	AGN is comfortable that the NameTitle field should be populated with an empty string if no title is available.		AEMO notes AGN's support for the change.
Section 3.8: CustomerTitle	47	Alinta Energy	No comment		AEMO notes that Alinta Energy has no comment on the change.
element	48	MGN	No issue		AEMO notes MGN's support for the change.
	49	Origin Energy	Noted		AEMO notes that Origin has noted the change.
	50	Simply Energy	Supports the NameTitle element changes as proposed	N/A	AEMO notes Simply Energy's support for the change.

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

			Ref #1 – B2B Ser	vice Order Specifications – Part 1	
Ref #	Participant	RMP Clause #	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response (AEMO only)
51	AGL		While the SO specification identifies the parent JECs, AGL suggests that it would be useful to ensure that there is a table showing the children JECs and their usage to ensure clear understanding and alignment with other Jurisdictional and electricity usage.	There are various tables from the PPC which could be inserted for clarity, in particular the tab called Meter & MIRN Status in PBP3 – Process Flow of Transactions.	AEMO notes that this change is not a typographical change, nor does it correct an administrative error in AEMO's collating the documents from previous consultations, and as such it will not be considered as part of IN018/20.
52	MGN		No issue		AEMO notes MGN's support for the change.
			Ref #2 – B2B Ser	vice Order Specifications – Part 2	
53	AGL		JEC Worksheet. The base AML code (AML- Row 3) seems to have been deleted.	Insert 'AML' into cellA3.	AEMO has made the requested change.
54	Alinta Energy	Row 3 column A	Job Enquiry Code (JEC) for Attach Meter Lock is missing.	AML	Please see Ref #53.
55	Alinta Energy	Row 3 column M	The WA Detailed Description includes the MIRN status, however this is now captured in new column P. Also rows 47, 58, 60, 62, 65, 66, 69-74.	MIRN status = Decommissioned	AEMO has struck out the MIRN Statuses given in Column M on the basis that this information is now captured in Column P.
56	Alinta Energy	Row 3 column O	Spelling error	TCI to install TAC devide device	AEMO has made the requested change.

57	MGN	No issue		AEMO notes MGN's support for the change.					
	Ref #3 – Spec Pack FRC B2B System Interface Definitions								
58	AGL	Life Support Reason codes –align with electricity usage	Suggest definition of 'Confirm Life Support' be aligned to the most recent changes in electricity which is for the responder to only provide what's currently recorded in their system.	AEMO notes that this change is not a typographical change, nor does it correct an administrative error in AEMO's collating the documents from previous consultations, and as such it will not be considered as part of IN018/20.					
59	AGN	FRC B2B SID v4 4.6.2.1 CustomerDetailsNotification Movement Type has been removed from Elements list in PBP1 Process Flow Table of Transactions. Should it be removed from this section as well?		"Movement_Type" was removed from the PBP1 because it was an .csv field. "MovementType" is an aseXML field and should be in the PBP1 and the B2B SID; AEMO has added it to the PBP1.					
60	AGN	FRC B2B SID v4 4.6.2.1 CustomerDetailsNotification The whole of the Figure 4-70 heading has been deleted, should just be the CSV portion	Figure 4-70 CustomerDetailsNotification/ CSVCustomer aseXML schema	AEMO has made the requested change.					
61	MGN	No issue		AEMO notes MGN's support for the change.					
	Ref #4 – Gas Interface Protocol (NSW-ACT)								
62	AGL	AGL supports the change		AEMO notes AGL's support for the change.					
		Ref #5 – Gas Ir	nterface Protocol (Queensland)						

63	AGL		AGL supports the change		AEMO notes AGL's support for the change.				
	Ref #6 – Gas Interface Protocol (Victoria)								
64	AGL		AGL supports the change		AEMO notes AGL's support for the change.				
65	MGN		No issue		AEMO notes MGN's support for the change.				
			Ref #7 – PBF	P 1 – Process Flow Diagrams					
66	AGL		AGL supports the change	The tables from the PPC which could be inserted into this document for clarity, in particular the tab called Meter & MIRN Status in PBP3 — Process Flow of Transactions. Also, AGL notes that with the WA processes, there is a new status of No Regulator, which should also be included for clarity.	AEMO notes that this change is not a typographical change, nor does it correct an administrative error in AEMO's collating the documents from previous consultations, and as such it will not be considered as part of IN018/20.				
67	MGN		No issue		AEMO notes MGN's support for the change.				
			Ref #8 – PBP1 – P	rocess Flow Table of Transactions					
68	AGL	Row 10	As there are now two address elements, once has been identified as xml, but AGL suggests that for completeness the description of the other Address element is identified as CSV. Further, the aseXML definition does not specify the Attributes/format, length or code the way the other aseXML elements do.	Eg – amend second Address to Supply Point Address (in csv transactions) Provide specific definitional information for the aseXML Address element	AEMO notes that this change is not a typographical change, nor does it correct an administrative error in AEMO's collating the documents from previous consultations, and as such it will not be considered as part of IN018/20. Further, this element is not in the scope of consultation IN018/20.				

69	AGL	Row 62	Australian Standard AS4590 (naming information) specifies that if the person has a single name only, then the family name field should be used. The Schema references AS4590, but it is unclear how csv files may operate. Can AEMO confirm that the first name can be left blank, and if so, AGL suggests that an additional note be added.	Suggest Add: Where the customer only identifies with a single name, then that name should be populated in the Family Name space and the person given name should be left blank.	AEMO notes that this change is not a typographical change, nor does it correct an administrative error in AEMO's collating the documents from previous consultations, and as such it will not be considered as part of IN018/20. Further, this element is not in the scope of consultation IN018/20.
70	AGL	Row 72	Check if an LSR gives current status for future		The description of the Date Required field in Row 72 is as follows: "For a registration of Life Support, this date will be the date Life Support protections commence at the premises. For a deregistration of Life Support, this date will be the date Life Support protection ceases to be provided at the premises. For response to a Life Support Request, this will be the effective date of the Life Support registration in the participants system."
71	AGL	Row 150	Last Modified Date Time Note that the field only defines the date information, not the time information for last modified.	The aseXML version required both date and time information as defined by the DATETIME definition.	AEMO notes that this change is not a typographical change, nor does it correct an administrative error in AEMO's collating the documents from previous consultations, and as such it will not be considered as part of IN018/20. Further, this element is not in the scope of consultation IN018/20.

72	AGL	Meter and MIRN Status	There are now additional and varied combinations of Meter & MIRN status and variations between East and West Coast,	AGL suggests that the 'Meter and MIRN Status' diagram in PBP 1 be updated to show how Trailer Air Couplings are included, how the WA regulator removal impacts MIRN status and a summary table also added – like the one shown:	AEMO notes that this change is not a typographical change, nor does it correct an administrative error in AEMO's collating the documents from previous consultations, and as such it will not be considered as part of IN018/20.
				SO / Imeter Status / MIRN Status Initiating	
73	AGL	Row 229, 230, 234, 281	The information for the Attributes/format, length or code is not listed the way it is for the other aseXML elements.		AEMO has added the information as requested.
74	MGN		No issue		AEMO notes MGN's support for the change.
			Ref #9 – PBP 1 -	· CSV Data Format Specification	
75	AGL		AGL supports the change		AEMO notes AGL's support for the change.
76	MGN		No issue		AEMO notes MGN's support for the change.
			Ref #10 – PBP3 –	B2B System Interface Definitions	

77	AGL	CI 4.6.2	The obligations to provide customer details exists within the Victorian framework and the NERR. AGL suggest that the reference to NERR either be deleted or extended to the Victorian Energy Retail Rules as well to ensure complete understanding by users.		Please see Ref #27.
78	AGL	CI 4.6.2	Table on page 163 – ID 1 & 2 Also delete the '/' after CustomerDetailsNotification		AEMO has made the requested change.
79	AGL	CI 4.6.2.1	Australian Standard AS4590 (naming information) specifies that if the person has a single name only, then the family name field should be used. The Schema references AS4590, but it is unclear how csv files may operate. Can AEMO / ASWG confirm that the first name can be left blank, and if so, AGL suggests that an additional note be added.	Suggest Add: Where the customer only identifies with a single name, then that name should be populated in the Family Name space and the person given name should be left blanks.	AEMO notes that this change is not a typographical change, nor does it correct an administrative error in AEMO's collating the documents from previous consultations, and as such it will not be considered as part of IN018/20. Further, this element is not in the scope of consultation IN018/20.
80	AGL	4.6.3	As there are 2 Notifications (CDN and LSN) AGL suggests that the Notification be fully identified.	Suggested amendment: A Distributor sends a CustomerDetailsRequest to the current Retailer when they reasonably believe that the information in the CustomerDetailsNotification has not been previously provided in a Customer Details Notification transaction or that the information they hold is or may be incorrect.	AEMO has made the requested change.
81	AGL	4.7.2 (a)	LSN initiators cannot be prospective retailers within Victoria.	Suggested amendment: The initiator of the Life Support Notification can be either the Distributor or Retailer as described by National Energy Retail Rules (NERR) rules 124(1)(c) or	AEMO made changed the clause to read as follows:

				124(4)(c), Victorian Energy Retail Code clause 125(1)(a)) and Victorian Gas Distribution Code clause 4A.3(1)(iv), as applicable.	The initiator of the LifeSupportNotification can be a Current Retailer, prospective Retailer or (in jurisdictions other than VIC) a Distributor.
82	AGL	4.7.2 (d)	Suggest that this be amended to be required where there is a shared Life Support Customer. The notification is not necessary when only one party is removing a registration from their records.	Suggested amendment: Where the Retailer or Distributor has completed the deregistration process for a shared Life Support customer they must send the other party an updated LifeSupportNotification.	AEMO has used the wording from the B2B Procedure: Customer and Site Details Notification Process, on agreement with the GRCF that gas would harmonise where possible with electricity. As such, AEMO will not be adopting this change.
83	AGL	Appendix A Customer/Per sonName	Suggest for allowed values that the description be extended to cover single person names.	Suggest Add: Where the customer only identifies with a single name, then that name should be populated in the Family Name space and the person given name should be left blanks.	AEMO notes that this change is not a typographical change, nor does it correct an administrative error in AEMO's collating the documents from previous consultations, and as such it will not be considered as part of IN018/20. Further, this element is not in the scope of consultation IN018/20.
84	AGL	Appendix A RegistrationO wner	Amend description for clarity	Registration <u>Process</u> Owner for Life Support	AEMO has used the wording from the B2B Procedure: Customer and Site Details Notification Process, on agreement with the GRCF that gas would harmonise where possible with electricity. As such, AEMO will not be adopting this change.
85	AGN		Appendix A Data Dictionary As some aseXML element names have changed, the table needs to be resorted.		AEMO has made the requested change.
86	MGN		No issue		AEMO notes MGN's support for the change.

	Ref #11 – PBP5 – NSW-ACT Specific Build Pack							
87	AGL		AGL supports the change.		AEMO notes AGL's support for the change.			
	Ref #12 – PBP6 – NSW-ACT (Wagga Wagga and Tamworth)							
88	AGL		AGL supports the change.		AEMO notes AGL's support for the change.			
	Ref #13 – Specification Pack Usage Guide							
89	AGL		AGL supports the change.		AEMO notes AGL's support for the change.			