

# PROPOSED PROCEDURE CHANGE (PPC)

# **Summary Section**

Issue Number IN018/20

Impacted Jurisdiction(s) NSW/ACT, QLD, SA, VIC, and WA

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Affected Gas Market(s) Retail Date proposal 13 July 2020

sent to AEMO

**Short Issue Title** Residual tidy-up for Q4 2021 gas retail market release

Other key contact

information

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VERSION #	PRESENTED TO	DATE
1.0	GRCF	19 January 2021



# PROPOSED PROCEDURE CHANGE (PPC) - DETAILED REPORT SECTION

### 1. DESCRIPTION OF ISSUE AND SUBMISSION DETAILS

### 1.1. Background

Across 2020, AEMO consulted on the following consultations relating to the adoption of aseXML schema version r40 in Q4 2021 by all AEMO-administered gas retail markets<sup>1</sup>:

- IN003/20 (Gas Life Support)
- IN011/20 (CDN and CDR)
- IN003/20W (CDN and CDR in WA)<sup>2</sup>
- IN002/15W and IN026/15 (New JECs)<sup>3</sup>
- IN009/19W and IN010/20W (Add Meter Status to WA gas retail transactions)<sup>4</sup>

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 part thereof. 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.

# 1.2. Submission details and key feedback areas

This PPC is designed to ensure that AEMO has adequately addressed concerns raised during the consultations listed in Section 1.1. The scope of this PPC 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 PPC 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 Thursday 18 February 2021 and should be emailed to <a href="mailto:grcf@aemo.com.au">grcf@aemo.com.au</a>.

### 2. REFERENCE DOCUMENTATION

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

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

<sup>&</sup>lt;sup>1</sup> Links to the relevant consultation pages is provided for participants' reference.

<sup>&</sup>lt;sup>2</sup> Please note: the Economic Regulation Authority (WA) has not yet issued final approval for IN003/20W.

<sup>&</sup>lt;sup>3</sup> Please note: the Economic Regulation Authority (WA) has not yet issued final approval for IN002/15W.

<sup>&</sup>lt;sup>4</sup> Please note: the Economic Regulation Authority (WA) has not yet issued final approval for IN009/19W and IN010/20W.



### 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), AGL noted that the T71 transaction would become obsolete given the new aseXML transactions and should accordingly be removed<sup>5</sup>. 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 believes that there is no need for a "six monthly refresh" transaction, since the customer details should already be up to date. As part of this consultation, AEMO is therefore seeking to understand whether there is any reason for which transaction T71 ought to be retained.

# 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:

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

TABLE OF TRANSACTIONS			ASEXML		
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 does not believe this transaction was ever implemented in gas retail market systems, which means that row 72 as it stands is a manifest error and can be amended without consequence to implement the changes to CDN and CDR (since the proposed Customer Details Request transaction would occupy T72). AEMO is seeking participant feedback on whether this amendment of "Update Meter Route" to "Customer

<sup>&</sup>lt;sup>5</sup> Please see Ref #12 in Attachment D here: <a href="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">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</a>



Details Request" would impact participants given that the "Update to Meter Route" transaction does not appear to have been implemented.

# 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 file<sup>6</sup> 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

Feedback to the IN011/20 PPC identified that these relate to CSV transactions and therefore need to be replaced for the new aseXML-payload transactions<sup>7</sup>.

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:

<sup>&</sup>lt;sup>6</sup> See, for instance, Table 4.6.2.1 in the PBP 3 B2B System Interface Definitions: <a href="https://aemo.com.au/-">https://aemo.com.au/-</a>
/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

<sup>&</sup>lt;sup>7</sup> Please see Ref #19 in Attachment D here: <a href="https://aemo.com.au/-">https://aemo.com.au/-</a>
/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



	Event Code	Description
	0	Success, OK, Accepted, etc.
Codes	201	Data missing
event (	202	Data invalid
Existing Event Codes	3603	Recipient is not responsible for the supplied MIRN
Ä	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.

AEMO is seeking participant feedback on whether these event codes adequately capture the relevant business events and, if participants wish to propose additional event codes, why these would be needed above and beyond the event codes provided in electricity.

# 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 proposed<sup>8</sup>:

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) <u>Initiate a Customer Details Notification when customer details change.</u>
- (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. For consistency, AEMO has applied 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. The rewording reflects diagram 4-63, which was approved by east-coast participants as part of consultation IN011/20.

AEMO is seeking feedback on whether any participants object to this rewording.

<sup>&</sup>lt;sup>8</sup> See Ref #10 in Attachment D here: <a href="https://aemo.com.au/-">https://aemo.com.au/-</a> /media/files/stakeholder consultation/consultations/gas consultations/2020/in003-20w/iir-in003-20w-wa-cdn-and-cdr.pdf?la=en



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

Feedback provided to AEMO after the close of consultations 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). AEMO has therefore made a number of amendments to the Data Dictionary appendices in the respective TP documents to align them with the aseXML schema. AEMO is seeking feedback on whether these changes accurately reflect requirements.

# 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 free text) and had incorrectly identified Life Support Equipment as "No Code Used" 9. 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 believes that this change is non-controversial.

### 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")<sup>10</sup>. Since this was a WA consultation, AEMO could only make the amendment for WA. AEMO has therefore made the same amendment for SA in 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. AEMO believes that this change is non-controversial.

### 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 4.1<sup>11</sup>.

Given that this change corrects a manifest error, AEMO believes that this change is non-controversial.

<sup>&</sup>lt;sup>9</sup> Please see Ref #16 and #17 in Attachment D here: <a href="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">https://aemo.com.au/-/media/files/stakeholder-consultations/consultations/gas-consultations/2020/in011-20/iir/iir-in011-20-add-cdr-and-cdn-to-gas-market-systems.pdf?la=en</a>

<sup>&</sup>lt;sup>10</sup> See Ref #13 in Attachment D here: <a href="https://aemo.com.au/-/media/files/stakeholder-consultation/consultations/gas-consultations/2020/in003-20w/iir-in003-20w-wa-cdn-and-cdr.pdf?la=en">https://aemo.com.au/-/media/files/stakeholder-consultations/consultations/gas-consultations/2020/in003-20w/iir-in003-20w-wa-cdn-and-cdr.pdf?la=en</a>

<sup>&</sup>lt;sup>11</sup> See Ref #17 in Attachment B here: <a href="https://aemo.com.au/-">https://aemo.com.au/-</a> /media/files/stakeholder consultation/consultations/gas consultations/2020/in011-20/notice-of-aemo-decision.pdf?la=en



### 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<sup>12</sup>. AEMO identified that this diagram also needs to be updated in the FRC B2B System Interface Definitions.

AEMO is seeking feedback on whether the diagram included in the proposed TP documents adequately captures requirements.

### 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 Diagram<sup>13</sup>. AEMO also made a number of editorial amendments to clarify the diagram proposed for the CDN transaction.

AEMO is seeking feedback on whether the diagram adequately captures requirements.

## 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 is the agreed solution where a customer's title is unknown, AEMO proposes 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 is seeking feedback on whether this wording adequately captures requirements.

### 4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

Effect on Retailers and Distributors

With the exception of the changes outlined in Section 3.3, the proposed changes merely clarify the amendments proposed in the consultations listed under Section 1.1. As such, these changes are not

<sup>&</sup>lt;sup>12</sup> See Ref #28 in Attachment B here: https://aemo.com.au/-

<sup>/</sup>media/files/stakeholder consultation/consultations/gas consultations/2020/in011-20/notice-of-aemo-decision.pdf?la=en

<sup>&</sup>lt;sup>13</sup> See Ref #33 in Attachment B here: <a href="https://aemo.com.au/-">https://aemo.com.au/-</a> /media/files/stakeholder consultation/consultations/gas consultations/2020/in011-20/notice-of-aemo-decision.pdf?la=en





expected to affect market participants above and beyond the effect of the consultations listed under Section 1.1.

The changes outlined in Section 3.3 require new event codes to be added for use in the CDN and CDR transactions. However, while the specific event codes to be added were not provided as part of IN003/20W and IN011/20, it was identified in those consultations that new event codes would be added. As such, AEMO believes that any effect from this consultation on market participants should have been incorporated as part of IN003/20W and IN011/20.

#### Effect on AEMO

Above and beyond the effect of the consultations listed under Section 1.1, the only consequence for AEMO systems is that AEMO will be required to add two additional event codes to gas retail market systems, which will not materially impact costs above and beyond those costs incurred as part of the consultations listed under Section 1.1.

Implementation timeframes

The consultations listed under Section 1.1 all suggested an effective date in Q4 (Oct to Dec) 2021. As such, this consultation IN018/20 proposes an effective date of 29 November 2021.

### 5. IMPACT OF ISSUE NOT PROCEEDING

The impact of not proceeding will be that the issues raised as part of the consultations listed in Section 1.1 will not be addressed, and the sets of changes proposed as part of the consultations listed in Section 1.1 will not be collated into a single set of documents.

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

AEMO has deemed this change to be non-material. The changes required as part of this consultation are already required as part of the consultations listed in Section 1.1, so this consultation IN018/20 should impose no additional system impact.

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 does not believe this consultation should create any costs for participants.

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

Given that there are not expected to be any costs, AEMO believes that the benefits outweigh the costs for both WA and for east-coast jurisdictions (i.e. the changes provide a net benefit for industry as a whole).

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

Regarding the changes in WA, AEMO's preliminary assessment of the proposal's compliance with clause 378 of the RMP (WA) is:





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.

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

Regarding the changes in east-coast jurisdictions, AEMO's preliminary assessment of the proposal's consistency with the NGR and NGO is:

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.

### 9. SUPPORTING DOCUMENTATION

Please see Attachment C for change-marked TPs.

### 10. PROPOSED TIMELINES

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

- Issue PPC on Tuesday 19 January 2021.
- PPC feedback due Thursday 18 February 2021.
- Issue IIR on Tuesday 16 March 2021.
- IIR feedback due Friday 16 April 2021.
- For east-coast changes, Notice of AEMO Decision issued in mid-May 2021.
- For WA changes, Economic Regulation Authority (ERA) submission issued in mid-May 2021.

The target effective date for these changes is Q4 (Oct-Dec) 2021; the specific date will be determined in consultation with the GRCF.





### ATTACHMENT A - PPC RESPONSE TEMPLATE

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

- Section 1 seeks feedback on AEMO's examination of the 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 18 February 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.