

IMPACT & IMPLEMENTATION REPORT (IIR)

Summary Section

Issue number	IN002/21		
Impacted jurisdiction(s)	SA		
Proponent	Rick Abbott rick.abbott@agig.com.au	Company	Australian Gas Networks
Affected gas market(s)	Retail	Consultation process (ordinary or expedited)	Ordinary
Industry consultative forum(s) used	GRCF	Date industry consultative forum(s) consultation concluded	Wednesday, 30 March 2022
Short description of change(s)	Amend the SA Retail Market Procedure (RMP) so that in-situ transfers remain open when the transfer read is early. SA and WW&T in-situ transfers remaining open when transfer read is early		
Procedure(s) or documentation impacted	Retail Market Procedures (SA) version 18.0.		
Summary of the change(s)	The changes proposed in this Impact and Implementation Report (IIR) involve amending the SA RMP so that the WW&T and SA gas retail markets are aligned with existing practice in VIC and QLD by enabling in-situ transfers to occur so long as the read is at most four business days in advance of the proposed transfer date.		
IIR prepared by	Jordan Daly	Approved by	Meghan Bibby
Date IIR published	21 July 2022	Date consultation concludes	18 August 2022
Email address for responses	grcf@aemo.com.au		
Other key contact information			



IMPACT & IMPLEMENTATION REPORT

1. DESCRIPTION OF ISSUE

1.1. Background

In September 2020, the Gas Retail Consultative Forum (GRCF) requested that AEMO investigate aligning the South Australian (SA) gas retail markets with existing practice in VIC and QLD by enabling transfers to occur so long as the read is at most four business days in advance of the earliest transfer day¹. This involves some minor changes to Chapter 6 of the SA Retail Market Procedures (RMP), which governs the customer transfer process, as well as several definitions. These minor changes are described in Attachment B of this Impact and Implementation Report (CR). This change also has IT system impacts for AEMO. The changes to AEMO IT systems involve modifications to SA Gas Retail Market System (GRMS) to enable transfers to occur if the read is at most four business days in advance of the proposed transfer date.

1.2. Summary of the issue

In the Wagga Wagga and Tamworth (WW&T) and South Australian (SA) gas retail markets, the reading used to perform in-situ transfers for basic-metered delivery points is generally the next scheduled meter reading (i.e., the reading taken as part of the normal quarterly reading cycle is used, instead of arranging for a special meter reading). As per clause 6.2.1 of the Retail Market Procedures (SA), once a transfer request is submitted, it will take effect on the first scheduled meter reading that is on or after the proposed transfer date. Hence, if the proposed transfer date were, for example, 1 April, and the scheduled meter reading occurred on 2 April, then the transfer would take effect on 2 April.

Meter readers use a “best endeavours” approach to undertaking a meter read, which can result in a read being undertaken a day or two earlier than the scheduled meter reading date. However, due to the way that clause 6.2.1 (Transfer Request) of the RMP SA is drafted, if the meter reader takes an early meter reading (e.g., in the above example, if the meter reader took a reading on 30 March), the transfer request cannot complete, since the scheduled meter reading is not “on or after” the proposed transfer date. This creates a need for the Network Operator to pursue manual work-around processes (i.e., generating another read with the same index but at a later date so that the transfer can proceed).

In Victoria² and Queensland, unlike in South Australia, the period in which meter data may be provided for in-situ transfers begins four business days before the proposed transfer date. For example, if the earliest transfer date were 1 April and the meter reader took an early meter

¹ Currently this term means the date specified in a transfer request as the earliest day on which the transfer may take place (for a move in, this would generally be the date the Customer is moving into the premises), subject to clause 6.2.3(a)(vii). In the changed RMPs this term becomes proposed transfer date

² By contrast to the RMP (SA), the RMP (VIC) do not employ the concept of an “earliest transfer date” but instead define the “proposed transfer date” (which, “in relation to a transfer request, means the day nominated in that transfer request as the day with effect from which the Market Participant who delivers the transfer request to AEMO is to be registered in the metering register as the FRO for the supply point to which the transfer request relates”). The RMP (VIC) then define the “allowable period” to mean either “(a) in relation to a transfer request lodged without a customer no-change statement, the period commencing on the 10th business day prior to the proposed transfer date and expiring on the fourth business day after the proposed transfer date; or (b) in relation to a transfer request lodged with a customer no-change statement, the period commencing on the fourth business day prior to the proposed transfer date and expiring on the fourth business day after the proposed transfer date”.



reading on 30 March, then the transfer would be able to proceed on the 30 March reading. This arrangement has been successfully deployed in these jurisdictions for several years.

1.3. Proposal

Australian Gas Networks (AGN) proposes to align the WW&T and SA gas retail markets with existing practice in VIC and QLD by enabling in-situ transfers to occur so long as the read is at most four business days in advance of the proposed transfer date. This involves some minor changes to Chapter 6, which governs the customer transfer process, as well as to several definitions.

Additionally, the RMP (SA) currently refer to the “proposed transfer date” as the “earliest transfer day”, since in SA the transfer can currently only occur on or after the proposed transfer date. Since the proposed changes would enable transfers in advance of the “earliest transfer day”, it is required to amend all instances of “earliest transfer day” to be “proposed transfer date”. AEMO has employed the definition of “proposed transfer date” as given in the RMP (VIC) in its proposed drafting of the new definition.

For the specific proposed RMP changes, please see Attachment B.

1.4. Submission instruction to this second stage consultation

Anyone wishing to make a submission for this second stage consultation stage is requested to use the response template provided in Attachment A. Submissions close 18 August 2022 and should be e-mailed to grcf@aemo.com.au.

2. REFERENCE DOCUMENTATION

- Retail Market Procedures (SA) version 18.0.

3. OVERVIEW OF CHANGES

The proposed changes are:

- To amend “earliest transfer day” to “proposed transfer date” (adopting the VIC definition for this term).
- To revert the definition of “allowable period” to how it was drafted prior to this consultation, namely: ‘The period of 102 days after the lodgement of a transfer request under clause 6.1.4.’
- To amend clause 6.8.2(a)(ii) to allow the transfer day to be on, after, or up to four business days before the proposed transfer date.
- Any editorial amendments that follow from the above, including clause 6.5.2.
- There are no changes proposed to be made to the SA/WA Interface Control Document³.

³ The SA/WA Interface Control Document is one of several documents that form the AEMO Specification Pack.



4. LIKELY IMPLEMENTATION EFFECTS AND REQUIREMENTS

AEMO will need to modify its IT system to allow for an in-situ transfer to complete when the meter read is received up to four business days prior to the proposed transfer date.

No system impacts are expected to AGN's or Retailers' systems.

5. OVERALL COST AND BENEFITS

As noted in section 4, there is no system impacts for AGN or Retailers. During the first-round consultation process, participants have not raised any implementation cost concerns with AEMO, therefore the total industry cost to implement this change is approximately \$15,000⁴.

In relation to benefits, the change will mean that in-situ transfers with an early transfer read are completed on-time, which will improve customers' experience and reduce the need for manual work-around processes by the Network Operator. Currently there are around 2,000 transfers per year impacted by this problem in SA and WW&T. Also this proposed process aligns east-coast jurisdictions and will therefore facilitate harmonisation between markets.

As such, it is expected that the change will facilitate competition by reducing barriers to entry for the SA gas retail market, will increase operational efficiency by enabling the standardisation of business processes across east-coast jurisdictions.

Having considered that above total industry implementation cost and the above benefits including AEMO views about improve customer experience mentioned in section 7 in this IIR, it is AEMO's view that the benefits associated with this change would outweigh the costs.

6. MAGNITUDE OF THE CHANGES

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

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

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

<p>Consistency with National Gas Law (NGL) and NGR</p>	<p>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). Participants will be given an opportunity during this PPC consultation to inform AEMO if they believe there is such an inconsistency.</p>
<p>National Gas Objective</p>	<p>As outlined in Section 6, AEMO's view is that the proposed change will help achieve the National Gas Objective through two mechanisms:</p> <ol style="list-style-type: none"> 1. Improve customers' experience; and 2. Introduce improved processes by reducing manual workarounds.

⁴ As noted in the PPC, AEMO's total costs should be approximately \$15,000.



Any applicable access arrangements	AEMO's view is that the proposed change is not in conflict with existing Access Arrangements. 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.
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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 OUTCOMES

On 8 March 2022 AEMO published on its website a PPC that put forward changes to the SA RMPs in Attachment B. Registered participants and interested stakeholders were invited to make submissions which closed on 30 March 2022.

Five submissions were received from AGL, Alinta Energy, Australian Gas Networks, Origin Energy, and Red and Lumo Energy. The submissions received from AGL, Alinta Energy, Australian Gas Networks and Origin Energy supported the proposed changes and proposed several editorial changes. Red Energy and Lumo Energy do not oppose AEMO's initial assessments of the proposal.

AEMO published a Time Limit Extension Notice on 13 April 2022. It is available [here](#). This Notice was raised as several submissions raised issues of such complexity that further time was required to consider how to address them. This involved discussions with the proponent, participants who submitted responses, and CGI to clarify the intent of each suggestion and the impact it would have on CGI's system. The outcome of this extension was to further amend the Retail Market Procedures, namely:

- To further amend the definition of "allowable period" by reverting it to how it was drafted prior to this consultation, namely: 'The period of 102 days after the lodgement of a transfer request under clause 6.1.4.' This continues to prevent the introduction of retrospective transfers to the market while allowing the proponent's proposal to be fulfilled; and
- Clarification of several clauses, such as the definition of 'proposed transfer date' as well as clauses 6.2.1 and 6.5.2 (d).

This delay of the publication of this IIR also meant the implementation date for the proposed changes required further outworking with the proponent and IT service provider. The effective date has been determined to be 10 October 2022.

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

IMPACT & IMPLEMENTATION REPORT – RECOMMENDATION(S)

9. SHOULD THE PROPOSED PROCEDURES BE MADE?

AEMO recommends making the changes proposed in Attachment B.

10. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO is targeting to implement this change on 10 October 2022.



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

- Issue IIR on Thursday 21 July 2022.
- Submissions on IIR close on Thursday 18 August 2022.
- Notice of AEMO Decision issued on Thursday 8 September 2022.
- Target effective date Monday 10 October 2022.



ATTACHMENT A – IIR RESPONSE TEMPLATE

A response template has been attached separately to this document. Anyone wishing to make a submission to this first stage consultation are to use this response template. Submissions close Thursday 18 August 2022 and should be emailed to grcf@aemo.com.au.



ATTACHMENT B - DOCUMENTATION CHANGES - RMP

Draft versions of the RMPs (extract) showing tracked changes between the current version and the proposed changes are shown below. Blue underline means addition and ~~red-strikeout~~ means delete. **Yellow shade** shows the changes made post the PPC version.

1.2.1 Definitions

allowable period

~~In relation to a transfer request, the period commencing on the business day prior to the proposed transfer date and expiring~~ **The period of 102 days after the lodgement of a transfer request** ~~under~~ **clause 6.1.4.**

proposed transfer date
~~earliest transfer day~~

In relation to a transfer request, means the day nominated in that transfer request as the day with effect from which the User who delivers the transfer request to AEMO is to be registered in AEMO's metering register as the current User for the supply point to which the transfer request relates ~~The date specified in a transfer request as the earliest day on which the transfer may take place~~ (for a move in, this would generally be the date the Customer is moving into the premises), subject to clause 6.2.3(a)(vii).

transfer time

The start of the *gas day*:

- (a) during which an *actual meter reading* for a *basic-metered delivery point* for which a transfer is *pending*, was undertaken; or
- (b) that an incoming *User* has specified as the proposed transfer date ~~earliest transfer day~~ for an *interval-metered delivery point*.



4.2.7. Re-energising delivery points

- (a) A Network Operator:
 - (i) may *re-energise* a *delivery point* when required to, or if not prevented, by law or a contract other than these Procedures; and
 - (ii) must (subject to law) *re-energise* a *delivery point* if required to under clause 4.2.8; and
 - (iii) must (subject to law), in response to a deemed request under clause 6.2.2(a), if a *transfer* has been marked as *pending* by AEMO under clause 6.6 for a *de-energised delivery point*, *re-energise* the *delivery point* either:
 - (A) on the proposed transfer date ~~earliest transfer day~~ nominated in the *transfer request* for the *delivery point*, if the *Network Operator* receives notification under clause 6.6(b)(iv) that the *transfer* has been marked as *pending* at least 2 *business days* before proposed transfer date ~~earliest transfer day~~; or
 - (B) otherwise, within 2 *business days* after the *Network Operator* receives notification under clause 6.6(b)(iv) that the *transfer* has been marked as *pending*.
- (b) The *current User* for a *delivery point* with a *MIRN status* of *de-energised* may at any time lodge an *energisation request* with the *Network Operator* for the *GDS* in which that *delivery point* is located.

- (c) If an *energisation request* was not lodged on a *business day*, then the *Network Operator* must respond to the *energisation request* no later than on the next *business day* as if the *energisation request* was lodged on that *business day*.
- (d) Upon receipt of an *energisation request* which is not valid, subject to paragraph (c), the *Network Operator* must reject the *energisation request* and notify the *Participant* that lodged the *energisation request*, *specifying* the reason why the *energisation request* is not valid.
- (e) Upon receipt of a valid *energisation request*, subject to paragraph (c), a *Network Operator* must accept the *energisation request*, and notify the *User* that the *energisation request* has been accepted.



6.2. The Transfer Request

6.2.1. Transfer request

(a) A *transfer request* must specify at least the following information:

- (i) the *MIRN*;
- (ii) the *proposed transfer date*~~*earliest transfer day*~~; and

Note: Unless a *special meter reading* is requested, the *transfer* of a *basic-metered delivery point* will take effect at the time of the next *scheduled meter reading* which occurs on, ~~or~~ after, or up to four business days before the *proposed transfer date*~~*earliest transfer day*~~, provided a *validated actual meter reading* is generated at that time.

Note: Under clause 6.2.3(a)(i), ~~an~~ *proposed transfer date*~~*earliest transfer day*~~ must be no earlier than 5 *business days* after the date on which the *transfer request* is lodged (except where it is for a *move in*) and within the *allowable period*.

Note: For a *move in*, the *transfer* will take effect on the *move in date* or if there is no *deemed meter reading* or a *special meter reading* cannot be obtained on the *move in date*, it will take effect at the time a *special meter reading* is obtained under clause 6.5.2.

- (iii) whether the requested *transfer* is a *move in*.

(b) By lodging a *transfer request* that is specified to be a *move in*, an *incoming User* represents to AEMO that the *transfer request* relates to a *move in*.

(c) An *incoming User* is taken to make the representation in paragraph (b) at the time of lodging the *transfer request* for a *move in* and on each day that the request is *open*.

(d) A *Self Contracting User* may request AEMO to:

- (i) lodge a *transfer request* on its behalf in order for the *Self Contracting User* to transfer to itself; and
- (ii) accept notices that are required to be in aseXML format under these Procedures on behalf of the *Self Contracting User* in relation to the *transfer request* referred to in sub-paragraph (i).

(e) Upon receiving a request under paragraph (d), AEMO must lodge a *transfer request* and accept notices in aseXML format on behalf of a *Self Contracting User* on such terms and conditions as AEMO determines.



6.2.3. Requirements for transfer request

- (a) A *transfer request* is valid only if:
 - (i) the *delivery point* exists within AEMO's *metering database*;
 - (ii) the *MIRN status* is *energised* or *de-energised*;
 - (iii) there is not, in relation to the *delivery point*, an *open transfer request*;
 - (iv) there is not, in relation to the *delivery point*, an *open error correction transaction*;
 - (v) the *incoming User* is registered as a *User* and has a contract with a *shipper* for the haulage of *gas* to that *delivery point*;
 - (vi) if it is for a *move in* — the *delivery point* is *basic-metered*; and
 - (vii) the proposed transfer date~~earliest transfer day~~ is within the *allowable period* and occurs:
 - (A) if the *transfer request* is not for a *move in* — no earlier than 5 *business days* after the date on which the *transfer request* is lodged; and
 - (B) if the *transfer request* is for a *move in* — no earlier than the date on which the *transfer request* is lodged and the start of the *allowable period* is no earlier than the lodgement date.
- (b) Upon receipt of a *transfer request* which is not valid, AEMO must reject the *transfer request* and notify the *incoming User* that the *transfer request* has been rejected, specifying the reason why the *transfer request* is not valid.



6.2.4. Response to valid transfer request

- (a) Upon receipt of a valid *transfer request*, AEMO must accept the *transfer request* and:
- (i) notify the *incoming User* that the *transfer request* has been accepted, specifying at least the following details:
 - (A) the unique identifier assigned by AEMO to the *transfer request*; and
 - (B) the process time of the *transfer request*;
 - (ii) notify the *Network Operator* that the *transfer request* has been accepted, specifying at least the following details:
 - (A) the *MIRN*; and
 - (B) the *incoming User*; and
 - (C) the *proposed transfer date*~~*earliest transfer day*~~; and
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- (D) whether the *transfer request* is for a *move in*; and
 - (E) the process time of the *transfer request*; and
 - (F) the unique identifier assigned by AEMO to the *transfer request*;
- (iii) notify the *current User* that the *transfer request* has been accepted, specifying at least the following details:
- (A) the *MIRN*; and
 - (B) the *proposed transfer date*~~*earliest transfer day*~~; and
 - (C) whether the *transfer request* is for a *move in*; and
 - (D) the process time of the *transfer request*; and
 - (E) the unique identifier assigned by AEMO to the *transfer request*; and
- (iv) if the *transfer request* is not for a *move in*, suspend the *transfer request* until lapse of the *transfer objection resolution period*.



6.4. Withdrawal of Transfer Request

6.4.1. Incoming User may withdraw transfer request

- (a) An *incoming User* may withdraw a *transfer request* for a *basic-metered delivery point* at any time before AEMO issues a *transfer confirmation* by lodging a *transfer withdrawal notice* with AEMO.
- (b) An *incoming User* may withdraw a *transfer request* for an *interval-metered delivery point* at any time up to two *business days* before the *proposed transfer date*~~*earliest transfer day*~~ specified in the *transfer request* by lodging a *transfer withdrawal notice* with AEMO.
- (c) A *transfer withdrawal notice* must correspond to an *open transfer request* previously lodged by the *incoming User*.

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- (d) Upon receipt of a *transfer withdrawal notice* which is not valid, AEMO must reject the *transfer withdrawal notice* and notify the *Participant* that lodged the *transfer withdrawal notice*, specifying the reason why the *transfer withdrawal notice* is not valid.

6.5. Move Ins Pending

6.5.1. Marking a move in as pending

If AEMO receives a valid *transfer request* for a *move in*, AEMO must:

- (a) mark the *move in* as *pending*; and
- (b) notify the *incoming User*, the *current User* and the *Network Operator* that the *move in* is *pending*.

6.5.2. Network Operator may be required to undertake special meter reading for a move in

- (a) If a *transfer request* is for a *move in* and:
 - (i) the *Network Operator* reasonably determines that there is no prospect of determining a *deemed meter reading* under clause 3.1.3, for the *proposed transfer date*~~*earliest transfer day*~~, and
Note: The *Network Operator* may make this determination if it determines that there is unlikely to be a *validated scheduled meter reading* or *special meter reading* in the 10 days before the *move in*.
 - (ii) no *scheduled meter reading* is scheduled for the *proposed transfer date*~~*earliest transfer day*~~, and
 - (iii) no *special meter reading* has been requested (at least 2 *business days* prior to the *proposed transfer date*~~*earliest transfer day*~~) by the *User*, for the *proposed transfer date*~~*earliest transfer day*~~,

then the *Network Operator* must undertake a *special meter reading*:

- (iv) on the *proposed transfer date*~~*earliest transfer day*~~; or
- (v) if the *proposed transfer date*~~*earliest transfer day*~~ is less than 2 *business days* after AEMO gives notice under clause 6.5.1(b) that the *transfer* is *pending* — within 2 *business days* after receipt of the notice.



- (b) If a *transfer request* is for a *move in* and either:
- (i) a *scheduled meter reading* is scheduled for, or not more than 10 days before, the ~~*proposed transfer date*~~*earliest transfer day*, or
 - (ii) a *special meter reading* has been requested (at least 2 *business days* prior to the ~~*proposed transfer date*~~*earliest transfer day*) for, or not more than 10 days before, the ~~*proposed transfer date*~~*earliest transfer day* by either the *current User* or the *incoming User*; or

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- (iii) the *Network Operator* is required to undertake a *special meter reading* under paragraph (a)(iv) or (a)(v);

and the *Network Operator* fails to obtain a *meter reading* under at least one of sub-paragraphs (i), (ii) or (iii), then the *Network Operator* must notify the *incoming User* of the failure by the end of the next *business day*.

- (c) If, within 3 *business days* after notifying the *incoming User* under paragraph (b), the *Network Operator* receives a request from the *incoming User* to undertake a *special meter reading* for the *delivery point* the subject of the *transfer request*, the *Network Operator* must undertake a *special meter reading* as soon as practicable.
- (d) If AEMO does not receive an *actual meter reading* or a *substituted meter reading* within ~~7~~ *business days of the* **7** *business days of the* ~~*proposed transfer date*~~*earliest transfer day*, then AEMO must:
- (i) *cancel the transfer request*; and
 - (ii) notify the *incoming User*, the *current User* and the *Network Operator* that the *transfer request* has been *cancelled*.



6.8.2. The transfer

- (a) If a *transfer* is pending for a *basic-metered delivery point* and AEMO receives *metering data* based on an *actual meter reading* for the *delivery point*:
- (i) within the *allowable period*; and
 - (ii) which would result in the *transfer day* being on, ~~or~~ after, or up to four business days before - the proposed transfer date ~~earliest transfer day~~,

then the *transfer* takes effect as from the *transfer time*, and AEMO must give a *transfer confirmation* to the *incoming User*, the *Network Operator* and the *current User* by:

- (iii) if AEMO received the *metering data* before 5.00 pm on a day — before the start of the next *gas day*; and
- (iv) otherwise — before the start of the second *gas day* after receipt of the *metering data*.

Note: The *transfer day* is the *gas day* upon which the *actual meter reading* is obtained. The *incoming User* is responsible for all transportation and haulage charges to and all *gas* withdrawals from the *delivery point* from the beginning of the *transfer day*.

Note: Upon accepting *metering data* under this clause, AEMO must update its *metering database*.

- (b) If a *transfer* is pending for an *interval-metered delivery point*, then the *transfer* takes effect as from the *transfer time*, and AEMO must give a *transfer confirmation* to the *incoming User*, the *Network Operator* and the *current User* after the *transfer time*.
- (c) Upon receipt of a *transfer confirmation*, the *Network Operator* must:
- (i) with effect from the *transfer time*, record the *incoming User* in the *metering database* as the entity which is withdrawing *gas* at the *delivery point*; and
 - (ii) within 24 hours provide to the *incoming User*:
 - (A) the *MIRN standing data* and the *meter standing data*; and
 - (B) for a *basic-metered delivery point* only, the *index reading* from the *metering data* AEMO received for the *delivery point* under clause 3.6.1, as referred to in paragraph (a).



ATTACHMENT C – FEEDBACK GIVEN TO PPC

Section 1 - General Comments on the Proposed Procedure Change

Topic	Ref #	Participant	Response	AEMO Response (AEMO only)
<p>Sections 1 to 9 of the PPC sets out details of the proposal.</p> <p>Does your organisation support AEMO's assessment of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO's assessment (include PPC section reference number) of the proposal and include information that supports your organisation's rationale for not supporting AEMO's assessment.</p>	1	AGL	<p>AGL Is supportive of changes to remove inefficiencies and make customer transfers more efficient and consistent across the gas markets.</p> <p>AGL generally believes that AEMO's assessment of the proposed changes is correct.</p>	AEMO notes AGL's support for this proposal.
	2	AGN	AGN supports AEMO's assessment.	AEMO notes AGN's support for this proposal.
	3	Alinta	Alinta Energy supports this proposal.	AEMO notes Alinta Energy's support for this proposal.
	4	Origin	Origin supports AEMO assessment.	AEMO notes Origin Energy's support for this proposal.
	5	Red/Lumo	<p>Red Energy and Lumo Energy (Red and Lumo) do not agree with the 3. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS and therefore question the assessment of 6. OVERALL COSTS, BENEFITS, AND MAGNITUDE OF THE CHANGES</p> <p>It is also possible that AEMO has overlooked FRC B2M PROCESS FLOWS when listing 2. REFERENCE DOCUMENTATION.</p> <p>Red and Lumo have identified that the proposed new definition of the allowable period reduces the allowable period to 101 days for any transfer that is not a move in with a proposed date less than 4 days after the transfer lodgement date. (see feedback below for 1.2.1 Definitions) and seek confirmation from other participants, including AEMO, whether this will have any material impact on their systems or processes?</p> <p>e.g. The proposed new definition of <i>allowable period</i> is defined as starting on the <i>fourth business day prior to the proposed transfer date</i> and ending 102 days after the transfer lodgement date.</p> <p>Day 0 transfer lodgement date</p>	<p>AEMO notes Red and Lumo's feedback.</p> <p>These 102 days are counted from the proposed transfer date, rather than transfer date. The period for a transfer remains 102 days according to the validations in the system. Changing the definition to 101 days would have system impacts on participants. As such, the drafting and process flows will remain the same.</p>



Topic	Ref #	Participant	Response	AEMO Response (AEMO only)
			<p>Day 1 (e.g. new insitu transfer) - start of allowable period</p> <p>Day 5 proposed transfer date (earliest transfer day)</p> <p>Day 102 after lodgement - end of allowable period</p> <p>102 -1 = 101 days in the proposed allowable period</p> <p>Red and Lumo also seek clarification as to whether this change will need to be reflected in FRC B2M PROCESS FLOWS SEQUENCE DIAGRAMS FOR THE SA AND WA GAS RETAIL MARKETS as there is a <i>102 calendar day allowable period</i> referenced in Diagram 2.2. PF(B2M) - R1.2: Transfer (Non Move-in) (Objection Process Not Shown)</p>	



Section 2 - Feedback on the documentation changes in the Attachments of the PPC.

Retail Market Procedures (SA)					
RMP Clause #	Ref #	Participant	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
Definitions	5a	AEMO	Definition of 'allowable period'	No change. The existing definition as described in current SA RMP version 18.0 stands. This is: The period of 102 days after the lodgement of a transfer request under clause 6.1.4.	AEMO proposes to reinstate the definition of 'allowable period' as it was before this consultation began. It will read as 'The period of 102 days after the lodgement of a transfer request under clause 6.1.4.'. The changes proposed to be made to the definition would need be unnecessarily complicated. An in-situ transfer is only valid if the proposed transfer date was at least 5 business days after the lodgement date, so specifying that the allowable period commenced on the fourth business day prior to the proposed transfer date is redundant.
3.1.3	6	AGL	I'm unclear how the -10 days deemed meter read for move in works with the drafting – I think that the deemed meter read is applied to the proposed transfer date – as opposed to -4 days (ie within the allowable period). Clarification of how this process works would be beneficial.		AEMO notes the AGL comment about deemed reads. The definition of 'allowable period' has been reverted to its original definition. Please see the response given in Reference #5a. A deemed meter reading will arrive in the system with the meter reading date of the Proposed transfer date and the flag "DM" (for deemed meter reading). The SA market system will not receive a deemed meter reading with a date of 10 days prior to the Proposed transfer date. Instead, the Network Operator will provide it to the SA market system as a deemed meter reading with a date of the Proposed transfer date.



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1.2.1 Definitions	7	Red/Lumo	<p>Is it intentional that the allowable period for a transfer has effectively been reduced to 101 days? This appears to be an unintended impact of the adoption of the Victorian RMP definition of proposed transfer date. <i>allowable period</i> is now being defined one day later; in relation to the proposed transfer date, not the lodgement of the transfer request</p> <p>The existing definition of <i>allowable period</i> for a non move in</p> <ul style="list-style-type: none"> • -5 transfer lodgement date - start of allowable period • 0 earliest transfer day • 102 days after lodgement - end of allowable period <p>The proposed definition of <i>allowable period</i></p> <ul style="list-style-type: none"> • -5 transfer lodgement date • -4 start of allowable period • 0 proposed transfer date (earliest transfer day) • 102 days after transfer lodgement date - end of allowable period <p>The difference in days between the end of the allowable period and the start of the allowable period is only 101 days.</p> <p>This does not impact a move in transfer if the proposed transfer date is</p>	<p>allowable period In relation to a transfer request, the period commencing on the fourth business day prior to the proposed transfer date and expiring 102 days after the lodgement of a transfer request</p> <p>vs</p> <p>6.2.3 Requirements for transfer request</p> <p>(vii) the proposed transfer date is within the allowable period and occurs:</p> <p>(A) if the transfer request is not for a move in — no earlier than 5 business days after the date on which the transfer request is lodged; and</p> <p>(B) if the transfer request is for a move in — no earlier than the date on which the transfer request is lodged and the start of the allowable period is no earlier than the lodgement date</p>	AEMO notes the Red/Lumo comment. Please see the response given in Reference #5.



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			less than 5 business days after the lodgement date, however the proposed transfer date may not be earlier than the transfer lodgement date.		
1.2.1 Definitions	8	AEMO	There are some italicising errors in the definition.	The word "AEMO" should be italicised as this is a current defined term in these RMPs. Also the italics on the word "metering register" needs to be removed as this is not a defined term in these RMPs	AEMO has made these corrections.
6.2.1 (a) (ii)	9	Origin	Minor editorial	Note: Under clause 6.2.3(a)(i), a n proposed transfer date must be no earlier than 5 business days	AEMO agrees with Origin Energy's correction and has therefore deleted the word "an" and has replaced this with the word "a".
6.2.1 (a) (ii)	10	Red/Lumo	"a proposed transfer date" rather than "an proposed transfer date"	Note: Under clause 6.2.3(a)(i), a n proposed transfer date	See response #9.
6.2.1 (a) (ii)	11	AEMO	Minor format error.	There is one italicising error in the note. The word "Business Day" should be italicised as this is a current defined term in these RMPs.	AEMO has made these corrections.
6.3.1 (a)	12	AGL	The drafting of this clause allows for a Network Operator to object to a transfer for 'one other than a move in' – ie an objection is allowed for an in-situ transfer. There seems to be no other reference to a Network Operator Objection for a move-in. This means that the Network Operator cannot		AEMO notes AGL's feedback about the whether the clause is possibly not fit for purpose. This feedback is unrelated to this specific proposal therefore AEMO considers it is out of scope. If any participant feels that the feedback raised in AGL should be further explored, please, submit a Gas Market Issue Gas Market Issue (GMI) outline the issues and any proposed changes.



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			object to a move-in transfer if the Incoming User has no haulage agreement. This does not seem appropriate. Surely if there is no haulage agreement, the move-in transfer should not proceed.		
6.5.2(d)	13	AEMO	Minor editorial	If AEMO does not receive an <i>actual meter reading</i> or a <i>substituted meter reading</i> within <u>7 days of the proposed transfer date</u> , then AEMO must:	The clause was originally was: 'If AEMO does not receive an <i>actual meter reading</i> or a <i>substituted meter reading</i> within 7 days of the <i>earliest transfer day</i> , then AEMO must:'. The PPC updated references to the 'earliest transfer day' with 'proposed transfer date' but removed the reference to '7 days'. AEMO proposes to reinstate this timeframe.
6.6 Title	14	AGL	Heading – Typo	<u>Other</u> Transfers Pending	AEMO notes AGL's comment about this typo. The missing "t" in the work "Other" is just a typographical error that AEMO introduced when preparing the PPC. The word "Other" is complete in the published version of the SA RMPs so no change is required.
6.6 Title	15	Red/Lumo	Oher should possibly be Other This appears to be an unintentional change in the PPC documentation as it is correct in the current RMP	<u>6.6 Other Transfers Pending</u>	See AEMO response #13.