



# Proposed Procedure Change (PPC) - 2024 Package 2 Victorian RMP changes

## Summary Section

Ref# (if applicable)	2024 Package 2 VIC RMP changes (IN011/13 and IN006/20)		
Impacted jurisdiction(s)	Victoria		
Proponent	Nandu Datar	Company	AEMO
Proponent email	grcf@aemo.com.au		
Affected Gas Market(s)	Retail		
Date proposal published by AEMO	02/06/2025	Date proposal sent to AEMO	1/8/2013 for IN011/13 and 13/11/2019 for IN006/20
Short issue title	2024 Package 2 (Retail Market Procedure (RMP)) changes that are minor non-controversial corrections) changes for IN011/13 (Address the regulatory gap in RMP related to Non Declared Transmission System (DTS) interval metering and IN006/20 (Minor RMP changes).		
Procedure(s) or Documentation impacted	Please refer to Section 2		
Other key contact information			

Version #	Presented to	Date
1.0	GRCF	2 June 2025

[aemo.com.au](https://aemo.com.au)

New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia  
Australian Energy Market Operator Ltd ABN 94 072 010 327

# Proposed Procedure Change (PPC) – Detailed Report Section

## Critical Examination of Proposal

### 1. Description of issue

#### 1.1. IN011/13 (Address the regulatory gap in RMP related to Non DTS interval metering) and IN006/20 (Minor RMP changes).

The Procedure change proposal addresses a gap in the current arrangements that leaves a class of Victorian interval meters and Custody Transfer Meters (CTM) outside the scope of regulatory instruments. It also addresses a minor change to the definition of customer which is a separate initiative to the gap in the current arrangements.

Under the existing regulatory framework, metering provisions for basic meter (DTS and non-DTS) are in the Retail Market Procedures (Victoria) (RMP) and the metering provision for non-basic meters are in Part 19 of the National Gas Rules (NGR), which only covers the DTS.

##### **Previous attempts to resolve potential regulatory gaps in relation to non-DTS areas**

In 2011 AEMO raised a Gas Market Issue (GMI) that proposed moving interval meter provision for the DTS out of the National Gas Rule (NGR) (part 19) and into the Victorian RMP where the basic meter provisions resided. This initiative was partly driven by the continuing desire to harmonise RMPs, noting other jurisdiction RMP coverages is both basic and interval metering. It was also driven by regulatory gap concerns of not having non-DTS interval meter provision in the RMPs. A change of this nature also required AEMO to submit a rule change to the AEMC.

Because of the National Energy Customer Framework (NECF) program of work this initiative was on hold for a year.

##### **Recent progress.**

In December 2023 the Gas Retail Consultative Forum (GRCF) endorsed AEMO's proposed 2024 Gas Retail Work Program including 2024 Package 2 Retail Market Procedure (RMP) changes. This package of work includes initiative IN011/13 that address the above issue. It also includes IN006/20 which is a minor change to the definition of customer.

In relation to IN011/13 in late 2024, AEMO commenced pre-consultation work that involved discussions with Distributors responsible for the three Non DTS areas (Bairnsdale, South Gippsland and Grampians<sup>1</sup>) in proposing a solution to address the regulatory gap in the Victorian RMP. AEMO has addressed the issues raised by the DBs for Bairnsdale and South Gippsland. In relation to the Grampians area, discussions are continuing as these requires further technical work and AEMO is working with Ausnet to resolve these technical matters.

---

<sup>1</sup> Grampians Non DTS area is connected to the Carisbrook to Horsham Pipeline. The AEMC website notes this pipeline is also known as the GPV Pipeline. It is a transmission pipeline located in western Victoria. The pipeline is owned by Gas Pipelines Victoria (GPV)

### **Consolidation of Net System Load (NSL) methodologies**

This Procedure change also proposes the consolidation of the NSL methodologies for the non-DTS networks currently prescribed in the Grampians Net System Profile Methodology document and in the adjunct agreements for the Bairnsdale and South Gippsland agreements into a single NSL methodology.

## **1.2. Pre-consultation outcomes**

In late April 2025, a GMI that provided details about the proposal including marked up version of the RMP VIC was submitted to the GRCF participants.

Submissions on this GMI closed on the 16 May 2025. AEMO received feedback from 7 participants. All support the proposal as set out in the GMI and no material issues were raised. The feedback included 2 minor editorial changes to the RMP. AEMO has made these minor updates to the RMP.

AEMO has made a few minor editorial type changes to improvement the drafting. AEMO has also added a new sub clause (8.1.6) that allows for a distributor to apply for an exemption for all or parts of the new chapter 8. This new sub clause also includes matters that AEMO needs to consider when assessing an application for exemption. AEMO has decided to add this new sub clause because of the technical metering issues within the Grampians Non DTS network. AEMO is continuing to work with the impacted parties to resolve these technical issues.

Participant feedback and AEMO's response to the feedback has been included in Attachment E.

## **1.3. How to make a submission**

Anyone wishing to make a submission for this PPC are requested to use the response template provided in Attachment D. Submissions close **COB 20 June 2025** and should be e-mailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

**IMPORTANT:** The scope of works is limited to the initiatives described above. The scope maybe expanded to pick up other minor typographical errors that are identified. A more thorough review of the other sections of the RMP VIC is out of scope for this consultation.

## **2. Reference documentation**

Retail Market Procedures (Victoria) V18.0. Click [here](#) to view this document.

National Gas Rules (Part 19) V84.0. Click [here](#) to view this document.

Grampians Net System Profile Methodology. Click [here](#) to view this document.

## **3. Overview of changes**

### **Changes for IN011/13.**

Add a new chapter to the RMP (Chapter 8) that creates a head of power to apply the metering provisions in Part 19 of the NGR for areas outside of the Declared Transmission System (non-DTS areas).

Currently, the Net System Load (NSL) Profile Methodology artefact for the Grampians non-DTS area is published on the AEMO website. The NSL Profile Methodologies for the South Gippsland and Bairnsdale non-DTS areas are included in adjunct agreements. As a part of this consultation package, the NSL arrangements for Bairnsdale and South Gippsland will be published as new procedures as per the NSL methodology for the Grampians area.

Marked up Procedure changes are included as **Attachment A**. Note: The changes for this initiative (IN013/11) have had a colour-coded comment in **yellow** applied to them indicating the changes related to this initiative.

The relevant section of the NGR to be applied is included as **Attachment B**.

The Net System Load (NSL) Profile Methodology procedures for non-DTS area are included as **Attachment C**.

#### **Change for IN006/20.**

This initiative is to improve the definition of “Customer” in all East Coast RMPs. This initiative was identified by AEMO back in late 2019 as part of the feedback AEMO received as part of the South Australian RMP harmonisation work (IN006/17).

The proposed change involves replacing the existing “Customer” definition with a definition that dovetails into other regulator instruments so that they are consistent.

In March 2025, initiative IN007/24 was implemented where the definition of “Customer” for NSW/ACT, QLD and SA RMPs were amended include a reference to section 109 of the National Energy Retail Law (NERL).

This initiative proposes a similar change for the Victorian RMP. As the NERL has not been fully applied in Victoria, a reference to the Energy Retail Code is used instead of the NERL.

Marked up Procedure changes are included as **Attachment A**. Note: The changes for this initiative (IN006/20) have had a colour-coded comment in **blue** applied to them indicating the changes related to this initiative.

## **4. Likely implementation requirements and effects**

As the NGR does not currently apply to interval meters and CTMs outside the DTS (Part 19 only applies to the Declared Wholesale Gas Market), there is no mechanism that obliges market participants to comply with the interval metering provisions of the NGR in non-DTS areas. This proposal addresses the issue by including the Part 19 of the NGR provisions in the RMP for areas outside of the DTS.

The consequence of not proceeding with the Procedure change will be the continuation of a lack of regulatory coverage for interval meters and CTMs in non-DTS areas and continued uncertainty for AEMO and market participants regarding metering obligations.

The intention of the Procedure change is a consistent set of metering obligations that encompasses the DTS and non-DTS areas.

As there are no current regulatory obligations covering interval meters in non-DTS networks, there will be an impact on current responsible persons to comply with the consistent set of obligations

and standards. This includes compliance with the relevant sub-procedures to which the NGR refers. These are:

- (a) metering uncertainty limits and calibration requirements procedures
- (b) energy calculation procedures
- (c) metering communications procedures
- (d) installation database procedures
- (e) metering register procedures
- (f) data validation procedures.

## 5. Impact of issue not proceeding

The impact of not proceeding will mean that no regulatory obligations will cover interval meters and CTMs in non-DTS areas. There will be continued uncertainty regarding the metering framework for those areas.

## 6. Overall cost, benefits and magnitude of the changes

AEMO considers that the proposed change to the RMP will ensure a consistently applied and enforceable set of metering obligations and standards throughout Victoria. These obligations are necessary to ensure the reliability and accuracy of metering services throughout the gas supply chain.

The proposed Procedure change achieves the above by addressing a gap in the existing regulatory framework in a way that improves the regulatory consistency, certainty, and compliance of metering obligations.

This change will also reduce the need for adjunct agreements for non-DTS areas. The remaining provisions in these agreements will be subject to separate negotiations between AEMO and the affected parties.

If a participant believes that any of the proposed changes are material, this feedback needs to be included in the Attachment B response template.

## 7. Consistency with the National Gas Rules (NGR) and National Gas Objective (NGO)

Regarding these changes, AEMO's preliminary assessment of the proposal's consistency with the NGR and NGO is:

Requirement	AEMO's Preliminary Assessment
<b>Consistency with National Gas Law (NGL) and NGR</b>	AEMO's view is that the proposed change is consistent with the NGL and NGR because the proposed changes properly reflect operational practices by filling the regulatory gap for Non DTS interval meters.
<b>National Gas Objective (NGO)</b>	As outlined in Section 6, it is AEMO's view that this change will ensure a consistently applied and enforceable set of metering obligations and standards throughout Victoria. These obligations are necessary to ensure the reliability and accuracy of metering services throughout the gas supply chain and is in the long-term interests of consumers as it promotes clarity and consistency for gas retail market participants.
<b>Any applicable access arrangements</b>	AEMO's view is that the proposed change is not in conflict with existing Access Arrangements.

If any participant believes that any of the above AEMO views are contentious, this feedback needs to be included in the Attachment D response template.

## 8. Supporting Documentation

- Attachment A Proposed Changes to RMP.
- Attachment B Part 19 of the NGR.
- Attachment C Grampians Net System Profile Methodology.
- Attachment D PPC response template

## 9. Proposed timelines

Subject to all necessary approvals, AEMO is targeting to implement this change by 31 October 2025.

To achieve this timeline, AEMO proposes the following key milestones:

- Issue PPC on 2 June 2025
- Submissions on PPC close 20 June 2025
- Issue Impact and Implementation Report (IIR) on 11 July 2025
- Submission on IIR close – 8 August 2025
- Publish AEMO decision before 5 September 2025
- Target effective date – 31 October 2025

## Proposed Procedure Change - Relevant Attachment(s)

### Attachment A – Proposed Changes to Retail Market Procedure (VIC)

[Blue underline](#) means addition and ~~red-strikeout~~ means delete.

A **shaded green** comment signifies a further change to the RMP has been made post GMI feedback which closed 16 May.

The draft versions showing tracked changes between the current version and the proposed changes is attached separately to this document

### Attachment B – Part 19 of the NGR (Reference only)

National Gas Rules (Part 19 – in particular rule 200 and all of Division 3, Subdivision 4 (Rule 290 to 316 inclusive). Click [here](#) to view this document.

### Attachment C – Grampians Net System Profile Methodology

It is proposed to delete the Grampians Net System Profile Methodology. Click [here](#) to view this document.

Note: It is proposed to delete this artefact.

### Attachment D – PPC Response Template

Attached separately to the PPC.

## Attachment E – Consolidated GMI Feedback for IN011/13 and IN006/20

### Part A - General Comments on the proposal

***Internal business team are to provide feedback on the following questions***				
Question	Ref#	Company	Participant Response	AEMO Response (AEMO only)
<b>1. In terms of the specific proposal to address the regulatory gap related to Non DTS interval meters, does your organisation support the proposal as it is described in the GMI? If not, please provide details about why your organisation doesn't support the proposal.</b>	.1	AGN	<i>AGN supports the proposal.</i>	AEMO notes AGNs support of the proposal
	2	MGN	<i>MGN supports the proposal</i>	AEMO notes MGNs support of the proposal
	3	Shell	<i>Shell Energy support this proposal</i>	AEMO notes Shell Energy's support of the proposal
	4	EA	<i>For Energy Australia in general any updates/changes that introduces consistency in the market is welcomed, we support the proposal.</i>	AEMO notes EAs support of the proposal
	5	Alinta	<i>Alinta supports the proposal to close the regulatory gap via the change marked Victoria RMP shared for consultation.</i>	AEMO notes Alinta's support of the proposal
	6	Red/Lumo	<i>Red Energy and Lumo Energy (Red and Lumo) support the proposal.</i>	AEMO notes Red/Lumo's support of the proposal
	7	AGL	<i>AGL supports the further development of consistent metering obligations within Victoria, noting the regulatory discrepancy.</i>	AEMO notes EAs support of the proposal
<b>Does your organisation support the proposed change to the definition of 'Customer' in Retail Market Procedure</b>	8	AGN	<i>AGN supports the proposed change</i>	AEMO notes AGNs support for the change



***Internal business team are to provide feedback on the following questions***				
Question	Ref#	Company	Participant Response	AEMO Response (AEMO only)
<b>(RMP) Victoria to bring it in line with definition of ‘Customer’ in other east coast RMPs? If not, please provide details about why your organisation doesn’t support the proposal.</b>	9	MGN	MGN supports the proposed change.	AEMO notes MGNs support of the proposal
	10	Shell	Shell Energy support this proposal	AEMO notes Shell Energy’s support of the proposal
	11	EA	For Energy Australia, As we understand it, we agree that the changes in the definition of a customer is acceptable, so that section is fine.	AEMO notes EAs support for the change.
	12	Alinta	Alinta supports the updated definition of Customer as detailed in the change marked Victoria RMP shared for consultation.	AEMO notes Alinta’s support for the change.
	13	Red/Lumo	Red and Lumo support the proposed change.	AEMO notes Red/Lumo’s support for the change.
	14	AGL	Noted	AEMO notes AGL feedback.
<b>3.Do you have any further comments on any other sections of the GMI you wish to raise? If so please provide further details.</b>	15	Shell	No further comments	AEMO notes Shell Energy no further feedback comment.
	16	EA	None at this stage.	AEMO notes EA has no further comments at this stage.
	17	Alinta	Alinta seeks confirmation that these changes have no impact to the historic agreement between AEMO & Gas DBs that ensured the DTS rules apply for non-DTS meters.	The historic agreements will no longer be required as the proposed RMP changes apply the metering provisions in the NGR to non-DTS areas.
	18	Red/Lumo	No, thank you.	AEMO notes Red/Lumo no further feedback.
	19	AGL	No further comments	AEMO notes AGLs no further feedback.

## Part B – Feedback on the documentation changes

## Attachment A – Retail Market Procedures (Victoria)

Ref #	Company	Clause #	Issue / Comment	Proposed text <i>Red strikeout</i> means delete and <i>blue underline</i> means insert	AEMO Response (AEMO only)
20	AGN	2.8.2(b)	Typo	(b) AEMO must apply the <i>net system load profile</i> <u>methodology</u> <del>mythology</del> to apportion into <i>gas days</i> the <i>consumed energy</i> in relation to each <i>meter</i> that relates to a <i>second tier supply point</i> connected to a <i>Non-DTS distribution system</i> .	AEMO agrees with AGN proposed changes and will update the RMPs accordingly.
21	AGN	8.1.3	Typo	Subject to Clause 8.1.4 each <u>transmission system service provider</u> , each <i>Distributor</i> for a <i>Non-DTS distribution system</i> and AEMO must comply with Part 19, division 3, subdivision 4 (the subdivision) of the Rules as if:	AEMO agrees with AGN proposed changes and will update the RMPs accordingly.

## Attachment A – Retail Market Procedures (Victoria)

22	AEMO	8.1.2 (b)	Improve the drafting by adding a reference to clause 8.1.3 (c) .	<p><b>8.1.2 Provision of metering installations</b></p> <p>For the purposes of this Chapter,</p> <p>(a) a Retailer must not withdraw gas or supply gas for withdrawal from a supply point on a distribution pipeline that forms part of a Non-DTS distribution system from which a tariff D Customer purchases gas from the Retailer unless that Retailer has first arranged for the supply point to have a metering installation.</p> <p>(b) subject to clause 8.1.3(c), Distributor for a Non-DTS distribution system must provide a custody transfer meter to measure the transfer of gas at each point between a transmission system and a distribution pipeline that forms part of the Non-DTS distribution system.</p> <p>(c) Each metering installation under (a) and (b) must be:</p> <p>(i) installed in accordance with Part 19 division 3, subdivision 4 of the Rules (the Metering Subdivision) and accurate in accordance with clause 298 of the Rules; and</p> <p>(ii) registered with AEMO.</p> <p>(d) AEMO must collect metering data from all metering installations under clause 8.1.2(a) and 8.1.2(b) unless otherwise agreed by AEMO and the affected participants.</p> <p><b>8.1.3 Application of Part 19 of the Rules</b></p> <p>Subject to Clause 8.1.4 each transmission system service provider, each Distributor for a Non-DTS distribution system and AEMO must comply with the Metering Subdivision of the Rules as if:</p> <p>(a) subject to clause 8.1.5, the subdivision formed part of these Procedures;</p> <p>(b) subject to subparagraph (c), the Distributor for a Non-DTS distribution system is the responsible person under the subdivision for each metering installation in its Non-DTS distribution system and each custody transfer meter between a transmission system and its Non-DTS distribution system; or</p> <p>(c) if the Distributor for a Non-DTS distribution system and the transmission system service provider have agreed, the transmission system service provider is the responsible person under the subdivision for a custody transfer meter between its transmission system and that Non-DTS distribution system.</p>	AEMO has made this change.
23	AEMO	New sub clause 8.1.6	Add a new sub clause (8.1.6) that allows for a distributor to apply for an exemption for all or parts of the new chapter 8. It also includes details about how AEMO will assess any such application.	See Attachment A – Proposed Changes to Retail Market Procedure (VIC)	AEMO has made this change.

## Attachment A – Retail Market Procedures (Victoria)

24	AEMO	8.1.3 (b)	Added “or”	<p><b>8.1.3 Application of Part 19 of the Rules</b></p> <p>Subject to Clause 8.1.4 each <i>transmission system service provider</i>, each <i>Distributor for a Non-DTS distribution system</i> and AEMO must comply with the Metering Subdivision of the Rules as if:</p> <p>(a) subject to clause 8.1.5, the subdivision formed part of these <i>Procedures</i>;</p> <p>(b) subject to subparagraph (c), the <i>Distributor for a Non-DTS distribution system</i> is the <i>responsible person</i> under the subdivision for each <i>metering installation</i> in its <i>Non-DTS distribution system</i> and each <i>custody transfer meter</i> between a <i>transmission system</i> and its <i>Non-DTS distribution system</i>; or</p> <p>(c) if the <i>Distributor for a Non-DTS distribution system</i> and the <i>transmission system service provider</i> have agreed, the <i>transmission system service provider</i> is the <i>responsible person</i> under the subdivision for a <i>custody transfer meter</i> between its <i>transmission system</i> and that <i>Non-DTS distribution system</i>.</p>	AEMO has made this change
25	AEMO	Chapter 8	Updated heading	<p><del>CHAPTER 8 – DISTRIBUTION PIPELINES THAT DO NOT FORM PART OF THE DECLARED DISTRIBUTION SYSTEM</del></p> <p><b>CHAPTER 8 – NON-DTS DISTRIBUTION SYSTEMS</b></p>	AEMO has made this change