GAS RETAIL CONSULTATION FORUM (GRCF)

FOR DISCUSSION	
SUBJECT:	IN011/12 – MODIFY CDN AND ADD CDR.
PAPER#:	6
CONTACT:	ARJUN PATHY
DATE:	FRIDAY, 15 MAY 2020

1. Purpose

The purpose of this paper is to

(i) review the participant feedback (see attachment A) in relation to the Gas Market Issue (GMI – IN011-20 (modify CDN and add CDR); and

(ii) discuss next steps and timing that AEMO would like the Gas Retail Consultative Form (GRCF) to consider.

2. Background

Currently, the Gas Retail Market (GRM) business processes to provide up to date customer contact details is different to the Electricity Retail Market (ERM) business processes. The major differences are:

(i) the ERM has a Customer Detail Request (CDR) transaction that allow the Distributor to request the Retailer to send a Customer Details Notification (CDN) transaction, and

(ii) the ERM uses a non-Comma-Separated Values (CSV) file in the AseXML payload for a CDN transaction whereas the GRM uses a CSV file in the AseXML payload (The CDN is gas is T70 and for further details see section 4.6.2 Amend Customer Details of the PBP3 B2B interface Definitions document. Click here to view).

These transactions (CDN and CDR) were enhanced in February 2019 as part of the ERM Life Support (LS) program of work which included adopting the r38 version of the aseXML schema.

In mid April 2020 a Gas Market Issue (GMI) was issued to the GRCF that proposed enhancements be made to CDN transaction and that the CDR transaction should be added to the suit gas retail market transactions. The GMI noted that these changes are integral to LS program of work in that they provided the additional LS patient details and not any account holder details. The GMI also noted that the lack of a CDR transaction means a gas distribution business cannot easily query a gas retailer and check customer details, which results in manual requests for information and spreadsheets being shared between businesses. Attachment B of this paper contains the GMI (including marked up changes to the technical protocols) which provides further details on the proposed changes and benefits.

In late April 2020, AEMO invited participants to review the GMI and the technical protocol changes and to provide feedback. This feedback is listed in Attachment A.

Attachment B contains the GMI and the technical protocol changes for Victoria.

3. Discussion

Attachment A contains the feedback that was received.

The following is an overall summary of the responses received:

- All participants except for Origin Energy and Simply Energy supported proceeding with the changes.

- No participant opposed bundling the CDN/CDR changes with the proposed Gas Life Support changes, assuming that both sets of changes proceed.

Given that the majority of participants supported this initiative, AEMO recommends that this proposal should now move into a formal procedure consultation under the Approved Process, which will involve issuing a Proposed Procedure Change (PPC) request on 25 May 2020. Given the current GMI contains well-formed requirements, participant should now undertake a more detailed assessment on the costs and benefits in order to ascertain if the benefits outweighs the cost. Given consistent GRCF feedback that the implementation of CDN/CDR should be bundled with Gas Life Support changes, cost and benefit estimates should be incremental on the changes required for gas life support (e.g. efficiency benefits that would already be delivered as part of the Gas Life Support changes should not also be reported as benefits here, and IT development costs that would already be required as part of the Gas Life Support changes should not be reported as costs here) This information needs to be included in the PPC feedback due 12 June 2020.

4. Matters for the GRCF to consider.

AEMO seeks feedback from the GRCF at the 21 May meeting on the following:

(1) Does the GRCF agree that there is sufficient consensus on the initiative to warrant AEMO's proceeding with a PPC for the change?

(2) Assuming that AEMO does proceed with issuing a PPC on the initiative, does the GRCF agree to the proposed timeline of issuing a PPC by 25 May 2020?

Attachment A - Consolidated feedback on the questions put forward on IN011/20 – (Modify CDN and add CDR to existing gas transaction set)

Question	Company	Participant Response
1. In terms of the overall technical design of this proposal *(see section 4 of the GMI - eg moving to a non-Comma-Separated Values (CSV) file in the AseXML payload and add the CDR aseXML transaction to suit of gas retail transactions)* does your organisation support the proposal as it is described in the GMI ? If not, what changes need to be made in order to gain your support.	AGL ✓	AGL supports the transition from csv to aseXML
	Multinet ✓	Multinet Gas supports the overall technical design of the CDR CDN transactions
	SE ✗	On behalf of Simply Energy, we do not support this change due to the following: - the transactions do not necessarily need to be mirrored with electricity markets where it can be simplified for gas; - CDN is already in place for the gas markets and based on our assessment, it works, regardless of it being csv file based; - to simplify and reduce the overall cost of implementation across the industry, Simply Energy believes there is no benefit to pursue the changes suggested in the GMI for CDR; - Gas processes are different to Electricity and we do not need to mimic transactions that are not required and as such, we see no benefit to 'fully align' the transactions used in gas and electricity retail markets.
	EA ✓	EnergyAustralia is supportive of the uplift to aseXML delivery for CDN transactions and the addition of the CDR aseXML transaction. EnergyAustralia requests the gas CDN/CDR changes to be aligned to the electricity aseXML schema, including format and field use (required, mandatory, optional).
	CRP (APA Group)/Allgas ✓	On preliminary assessment, Central Ranges Pipeline (APA Group) and Allgas Energy supports the proposal as detailed in the GMI in principle, however a detailed analysis and cost estimate to establish whether the benefits of converting the CDN to pure aseXML will outweigh the cost.
	OE ✗	Refer to Q3 response
	JGN ✓	JGN is supportive.
	AGN ✓	On preliminary assessment, AGN supports the proposal in principle, however we still need to perform a detailed analysis and cost estimate to establish whether the benefits of converting the CDN to pure aseXML will outweigh the cost.

Question	Company	Participant Response
	AusNet ✓	AusNet Services is supportive of the proposal to adopt AseXML as proposed described in the GMI. The inclusion of CDR, in addition to CDN, transactions would improve the accuracy and relevance of our supply interruption notification letters and our attempts to arrange for meter read access at customers with locked gates.
	Red and Lumo ✓	Red Energy and Lumo Energy (Red and Lumo) support the proposal as it has been put forward in the GMI. We believe the technical design that has been put forward is appropriate and matches our previous expectations.
	Alinta ✓	Alinta Energy supports the proposal as outlined in section 4 of this GMI. Our support is conditional on the basis that the technical design is harmonized across all east coast markets and replicates a similar solution to what we have deployed in electricity markets. To be an effective benefit to customers and industry participants the use of these transaction and agreed processing/ exceptions rules would also need to be defined in order to not burden retailers with modified use of each transaction across the distributors. It is also imperative that this change is bundled into one release along side life support initiative in order to be a cost-effective delivery.
2. In terms of the prioritisation and timeline (*see section 3 of the GMI - eg most cost effective and efficient means to implement the changes set out in the GMI would be to include the gas life support (GLS) program of work)* does your organisation support the idea of bundling these changes with the GLS program of work (if this program of work goes ahead)? If not, what changes need to be made in order to gain your support.	AGL	AGL agrees that the most cost effective tie to make this change is with a schema release and other proposed changes, such as LSN/LSR
	Multinet	Multinet Gas supports the timeline and that we bundle these changes with the Gas Life Support program of work.
	SE	We understand that Gas Life Support program can be dealt in isolation to this GMI. In Electricity Retail Market, CDN/CDR was not changed due to the introduction on LSN/LSR and as such, we see no reason to change the existing CDN logic in Gas, in order to implement LSN/LSR in Gas Retail Market.
	EA	EnergyAustralia prefers the CDN/CDR uplift to occur in conjunction with the gas life support LSN/LSR changes. As these changes both require a schema uplift, bundling these changes will be more efficient.
	CRP (APA Group)/Allgas	Central Ranges Pipeline (APA Group) and Allgas Energy support the bundling of these changes with the gas life support program of work, scheduled for Q4 2021.

Question	Company	Participant Response
	OE	As specified in the IIR IN003/20: Adoption of LSN and LSR Transactions for Gas Life Support, the later period of the proposed date is recommended ie. Q2 (Mar-Jun) 2022 or later. This allows for this change to be effectively managed outside the suite of other market initiatives that are planned for 2021. If the GSL program of work goes ahead then the bundling of this is the most effective and efficient means to implement.
	JGN	Yes
	AGN	AGN supports the bundling of these changes with the gas life support program of work, scheduled for Q4 2021.
	AusNet	AusNet Services considers the adoption of aseXML for CDN and CDR transactions is more beneficial to customers than the introduction of the life support transactions. Therefore, we recommend aligning the introduction of changes to modify CDN and add CDR to the existing gas transaction with the life support transaction changes. Both changes require IT changes. Merging the IT development for both initiatives will reduce total implementation costs. In terms of prioritization, we consider this change and the life support change as the only changes that warrant significant priority and resources to implement. Other changes that do not involve system alterations can still be progresses, but the CDN/CDR/life support change pack must take priority. The industry is currently in discussions as to the timing of this change. At this stage, we would support an implementation between mid-2021 and mid-2022.
	Red and Lumo	Red and Lumo believe that the implementation of this proposal will be most efficient and effective if this proposal is aligned with the GLS program of work. Separating these two work streams will not only reduce the effectiveness of the changes but will potentially increase the costs of the proposal. On the timing of implementation Red and Lumo are supportive of a Q4 2021 implementation date.
	Alinta	We support this initiative on the basis that this will be a bundled change as part of our gas life support program of works. To deploy this change on its own would not be a cost-effective solution that Alinta Energy will support if the program of works outside of this change does not go ahead then we would not support this change to continue to go ahead.

Question	Company	Participant Response
3. In terms of the likely benefits (*see section 6 of the GMI*) does your organisation agree with the points raised in this section? Also does your organisation expect that the benefits will outweigh the costs?	AGL	AGL believes that the benefits identified in the GMI are relevant to both AGL and network operators.
	Multinet	Yes, Multinet Gas Networks agrees with the points raised and does believe that the benefits gained with implementing these transactions will outweigh the costs
	SE	Simply Energy believes that this would be a 'cost-only' exercise in implementing this GMI and it outweighs the benefit due to: - additional cost of implementing new processes; - additional cost of implementing aseXML logic instead of .csv logic; - additional cost of implementing CDR transactions, and underlying system validations; - additional cost of handling for CDR transactions, exception management, agent training, etc.
	EA	EnergyAustralia agrees with the benefits described in section 6 of the GMI. The benefits of the CDN/CDR uplift in conjunction with the longer-term benefits of maintaining a more recent schema for gas outweigh the costs. As stated, EnergyAustralia is supportive of these changes occurring in conjunction with the gas life support changes. As stated, EnergyAustralia is supportive of these changes occurring in conjunction with the gas life support changes.
	CRP(APA Group)/Allgas	Central Ranges Pipeline (APA Group) and Allgas Energy agree with the likely benefits outlined. As noted above, detailed implementation cost estimates have not yet been prepared. However, with anticipated greater focus on the customer via the Energy Charter (working better together), the improved exchange of customer information will be important in delivering good customer service. An efficient automated system such as that outlined in the proposal will be important in ensuring this goal can be met. It will assist the industry to identify and record vulnerable customers in order to tailor specific initiatives to help them. This has been evident during the recent bushfire and Covid-19 events
	OE	Origin has expressed the large costs associated to uplift to aseXML schema to schema version r38 does not outweight the benefits for such a change. However, ackowledges if this change were to proceed it is best coupled in with the GLS program of work
	JGN	Yes

Question	Company	Participant Response
	AGN	AGN agrees with the likely benefits outlined. As noted above, detailed implementation cost estimates have not yet been prepared. However, with anticipated greater focus on the customer via the Energy Charter (working better together), the improved exchange of customer information will be important in delivering good customer service. An efficient automated system such as that outlined in the proposal will be important in ensuring this goal can be met. It will assist us as an industry to identify and record vulnerable customers in order to tailor specific initiatives to help them. This has been evident during the recent bushfire and Covid-19 events.
	AusNet	AusNet Services agrees with the benefits presented in section 6 of the GMI.
	Red and Lumo	At this stage Red and Lumo believe that the benefits will outweigh the costs in the long term for this proposal over the long term.
	Alinta	Alinta energy agree with the likely benefits raised in this GMI. Regulatory obligations in managing customer data and Life Support registrations require effective, efficient and auditable transaction trails for all parties to manage these requirements and currently there is minimal mechanisms in the gas retail markets in order to support this. The proposed GMI would provide fundamental information to the distributor for the purpose of outage management and other shared customer purposes. It is imperative that while we look to improve the information sharing between retailers and distributors for the purpose of life support, that we equally look to implement the same for all other customers that we have a relationship with. I think it is also imperative that building a reconciliation of customer details is mandated between parties to ensure, accuracy of information is updated.
4. Any other comments on this proposal?	AGL	No further comment
	Multinet	There is a mistake in section 6: states CDR but should be CDN “The proposed change associated with the aseXML transaction is similar to the current arrangement except that the information for each MIRN is sent in an individual transaction by the FRO Retailer to the Distributor each night when the account is created or when some aspect

Question	Company	Participant Response
		of those details change (eg phone number). The CDR is one directional, from FRO Retailer to Distributor"
	SE	No other comments
	EA	Due to planned system and technology changes, we request AEMO to provide EnergyAustralia with ample notice of implantation date if this change proceeds.
	CRP(APA Group)/Allgas	CDN must only be sent by the current FRO. Suggest that the procedures or technical documents should include validation of this, as they appear to be silent on this currently. This should include a review of all validations. Suggested corrections of typographical errors in the GMI as follows: Section 4 2. Add the Customer Details Request (CDR) transaction to the suite of aseXML transactions used in the East Coast. Section 6, 8th paragraph The proposed change associated with the aseXML transaction is that the FRO Retailer will generate the aseXML Customer Details Notification (CDN) each night and send the Distributor the customer details when the account is created or when some aspect of those details change (e.g. phone number). The CDN is one directional, from FRO Retailer to Distributor.
	OE	
	JDN	CDR transactions exist in the NEM and are widely used by Distributors and Retailers as an effective method for communicating customer contact details. Jemena looks forward to this change being implemented in gas as well.
	AGN	CDN must only be sent by the current FRO. Suggest that the procedures or technical documents should include validation of this, as they appear to be silent on this currently. This should include a review of all validations. Suggested corrections of typographical errors in the GMI as follows: Section 4

Question	Company	Participant Response
		2. Add the Customer Details Request (CDR) transaction to the suite of aseXML transactions used in the East Coast. Section 6, 8th paragraph The proposed change associated with the aseXML transaction is that the FRO Retailer will generate the aseXML Customer Details Notification (**CDN**) each night and send the Distributor the customer details when the account is created or when some aspect of those details change (eg phone number). The CD~~R~~N is one directional, from FRO Retailer to Distributor.
	AusNet	N/A
	Alinta	No further comments

Attachment B-

Ref 1 – Gas Market Issue (GMI) – IN011/20 (CDN and CDR)

GMI -IN011-20 CDN CDR v3.pdf

Ref 2 – Participant Build Pack 3 - Interface Definitions (marked up changes)

Participant Build Pack 3 B2B System Interface Definitions v3.7 (Marked up - includes IN011-20).pdf