

17 February 2017



Ms Nicola Cusworth
Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

10 Eagle Street
Brisbane QLD 4122
T 07 3347 3100

Dear Ms Cusworth

Approval of amendment to the Retail Market Scheme – Procedure Changes IN001/16W, IN002/16W, IN034/16W and IN040/16W.

Under section 11ZOL of the *Energy Coordination Act 1994* (the “Act”), The Australian Energy Market Operator (AEMO) may prepare an amendment to its Retail Market Scheme (the “Scheme”), and submit the amendment to the Economic Regulation Authority (ERA) for approval. ERA is to approve amendments to the Scheme under section 11ZOM of the Act. The Scheme is defined to include, amongst other things, the AEMO Retail Market Procedures (RMP), the AEMO Specification Pack and the FRC Hub Operational Terms and Conditions. AEMO is applying to the ERA for four amendments to the Scheme as described in attachment A.

Background.

Chapter 9 of the RMPs sets out the procedure change process that AEMO must follow before submitting changes to ERA. AEMO has applied this process to help AEMO and stakeholders develop these four amendments proposed in this application culminating in AEMO publishing final Impact and Implementation Reports (IIR) for each amendment on its website on the 1 February 2017. As per clause 399A each participant, pipeline operator, prescribed person and interested person were invited to lodge an objection to the proposed amendments. Submissions closed on 14 February 2017 with no objections received.

The consultation that under pins the procedure change process also determined that all four amendments are “low impact” in that they (i) do not have a material impact on the information technology systems of AEMO, participants, pipeline operators or prescribed persons; or (ii) do not materially alter consumer protection mechanisms under the RMPs; or (iii) do not have a material commercial impact on AEMO, participants, pipeline operators or prescribed persons.

In accordance with clause 400A (1), AEMO has decided to submit the four amendments as endorsed procedure changes. The changes set out in this application remain unchanged from the changes contained in each of the final IIRs. These IIRs described matters that AEMO had taking into accounts when developing the amendments, consultation outcomes and other information about the change. Click [here](#) to view the AEMO website page that contains these IIRs.

Amendments to the Scheme for ERA consideration.

Attachment A contains a brief summary of each amendment and includes a description on what artefact under the Scheme is changing, the actual change (in “track change” mode) and any additional relevant information that is not covered in the IIR.

Section 11ZOO (1) and (2) of the Act specifies the criteria that the ERA is to consider in determining whether to approve an amendment to the Scheme. AEMO believes the content

APPLICATION TO ERA RE PROCEDURE CHANGES (IN001-16W, IN002-16W, IN034-16W AND IN040-16W)

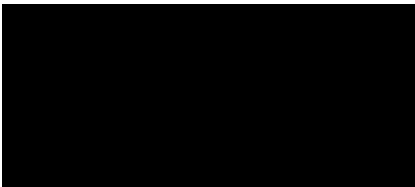
contained in this application and the final IIRs satisfies that criteria allowing ERA to properly consider the amendments.

In accordance with clause 400A (3) of the RMP, AEMO must provide information to stakeholders about how to make submission to ERA on these endorsed procedure changes including a closing date for any ERA submissions. Dr Natalie Robins from ERA has provided AEMO with this information which included advice that submission to ERA will close **10 March 2017**. Upon sending this application, AEMO will publish on its website this application and the information about making submission to ERA.

Should ERA approve all four endorsed procedure changes AEMO would like to implement all these changes to take effect on **31 March 2017** to meet the timing desired by the marketplace in the case of IN034/16W and IN040/16W the timing aligns with the same changes that AEMO is currently consulting on for those jurisdictions that operate under the National Gas Rules (NGR). As a result, AEMO request that ERA consider, approve, and publish the approval for these changes in the *Gazette* by this date.

If you require and further information or if have any questions in relation to this application, please contact me on 07 3347 3059.

Yours sincerely



Mr Peter Geers
Executive General Manager Markets
Australian Energy Market Operator

cc:

Attachments:

Attachment A

IN001/16W - Move-In Transfer when an Error Correction Notice (ECN) has been Raised

1. This proposed change involves adding a note to clause 78 of the RMP as a reminder that when Users lodge a Move-in transfer request when an Error Correction Notice (ECN) has been raised it must meet the definition of move in per rule 78.
2. The Scheme document that requires the amendment is the RMP.
3. The following is an extract from the RMP showing the changes in “track change” mode with ~~red-strikeout~~ meaning “delete” and blue underline meaning “insert”

78. Move in defined

A “move in” occurs when:

- (a) a *small use customer* commences occupation of premises; and
- (b) there is an associated change of *user* for the *delivery point* which supplies gas to the premises.

{Note: In the event that a *current user* becomes aware of an error as the result of lodging an incorrect transfer request with AEMO and an error correction notice is raised per clause 32, the new transfer request should not be specified as a move in per clause 81(2) unless the definition of a move in per clause 78 would apply to that new transfer request}

4. There is no additional information to submit with this application.

IN002/16W - Clause 255 Special Circumstances

1. The proposed change involves adding a note to clause 255(1) of the RMP as a guide to when a Special Circumstances notice should be sent and amending clause 255(2) to clarify when and to whom AEMO should send information. The change requires the Pipeline Operator to send Special Circumstances notices to a new AEMO e-mail address. AEMO currently disseminates the Special Circumstance notice to the Procedure Change Committee (PCC) contacts. The PCC has agreed that the contacts contained in the Gas Business Operator Identifier (GBO id) is more appropriate.
2. The Scheme document that requires amendment is the RMP.
3. The following is an extract from the RMP showing the changes in “track change” mode with ~~red-strikeout~~ meaning “delete” and blue underline meaning “insert”

255 Pipeline operator to inform of special circumstances

{Note: The following is a guide to assist the *pipeline operator* in assessing whether it should provide a notice to AEMO under clause 255(1). The *pipeline operator* should consider:

- The materiality of the special circumstances. That is, how material was the difference between what the *pipeline operator* injected vs. what *shippers* nominated for *injection* and/or the *swing service providers* requested for repayment. As a guide, a difference of greater than 15% of the gate station nameplate capacity should generally be considered material. Alternatively the *pipeline operator* should consider whether deliveries of gas into a sub-network have been either partially or fully curtailed.

The Information Pack document "Non-IT RMP Communications" prescribes the e-mail address where notices under clause 255(1) should be sent.}

- (1) If the *pipeline operator* of a *pipeline* is aware of anything which prevented gas deliveries through the *gate point* on the *pipeline* being made in accordance with a *shipper's* request for *injections* or *swing service provider's* request for *repayment* (as applicable) under its *transmission contract* on a *gas day*, in a manner that may have contributed materially to *swing service*, then it must, as soon as practicable, give AEMO a description of the cause and circumstances of that prevention, and the manner in which *injections* or *repayments* (as applicable) were affected.

- (2) AEMO must, within 1 hour after receiving information under clause 255(1), *promptly* provide the same information to each person who has a GBO identification that is active. ~~each user which gave an allocation instruction allocating gas to a shipper in the pipeline for the gas day, and each shipper named in each such allocation instruction.~~

{Note: For the avoidance of doubt, when providing the information in clause 255 (2) AEMO will use the e-mail address contained in the GBO identification table published on AEMO's website}

4. In addition to the information contained in the final IIR it is worth noting that the current process lacked clarity around who within each organisation needs to receive the 255 notices. AEMO currently provides these notices to those on the Procedure Change Committee (PCC) e-mail distribution list. The PCC members would then forward this information on to others within their organisation. AEMO proposed that the electronic address (e-mail address) prescribed in the Gas Business Operator Identification (GBO id) table be used as the "record of source" to disseminate this notice. AEMO has not received any submission rejecting this proposal and this will be implemented as part of this change.

IN040/16W - Add further clarity to the FRC Hub Terms and Condition.

1. This proposed change involves an amendment to the current subscriber's response time for a service interruption during non-business hours if the next day is a Saturday or a Public Holiday.
2. The Scheme document that requires amendment is the FRC Hub Operational Terms and Conditions.
3. The following is an extract from the FRC Hub Operational Terms and Conditions showing the changes in "track change" mode with ~~red-strikeout~~ meaning "delete" and blue underline meaning "insert"

- 4.1.3 Where a *Subscriber* becomes aware of any service interruption associated with their gateway, the *Subscriber* must deliver a notice identifying the issue via the FRC relay notification facility at the earliest opportunity but at least within the timeframes set out in Table 4.

TABLE 4

PERIOD	RESPONSE TIME (HOURS)
Business Hours Mon -Fri (excluding Public Holidays)	1
Non-Business Hours Mon – Fri (excluding Public Holidays)	Within 1 hour of the commencement of the next Business Day. <u>Exception: 4 hours if after 7pm and the next day is Saturday or a Public Holiday.</u>
Sat, Sun, (starting 0:00 Sat and finishing 7:00 am Mon) Public Holidays	4

Business Hours are defined as 7am to 7pm Monday to Friday.

Non-Business Hours are defined as 7pm to 7am Monday to Thursday, 7pm to 11:59pm Friday.

4. There is no additional information to submit with this application.

IN034/16W - Self Service initiative to FRC HUB Certification process.

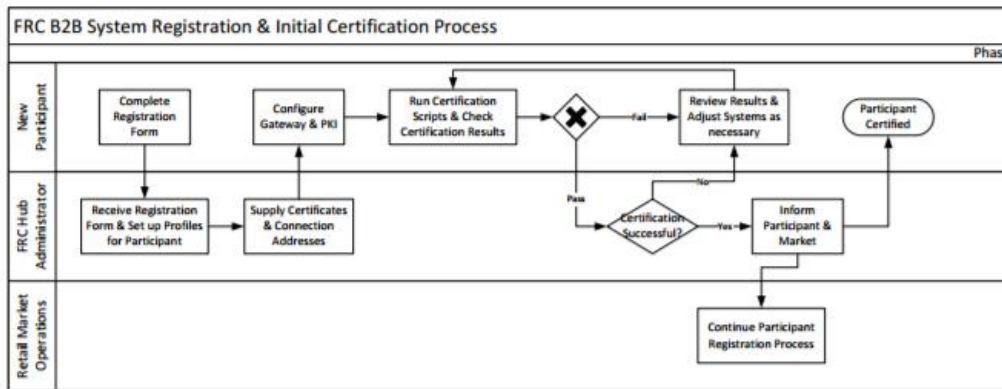
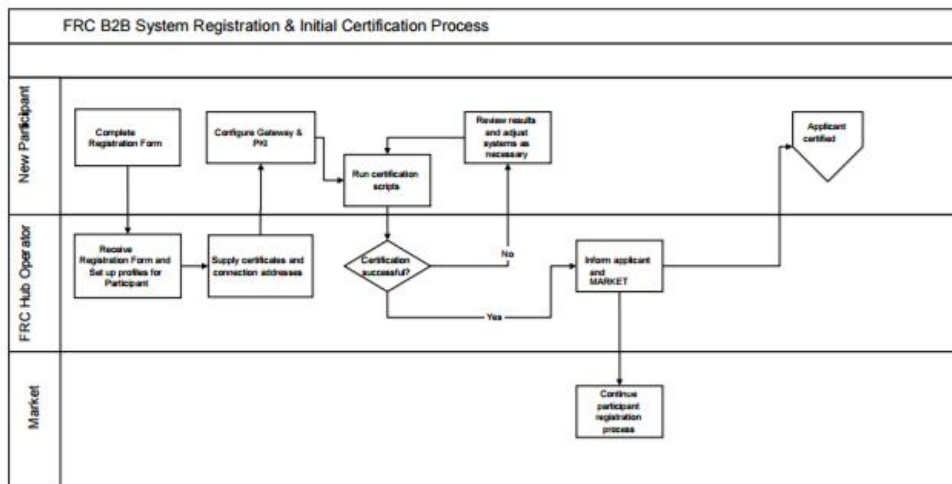
1. AEMO certification responder is an IT testing tool that enables AEMO and participants to test whether transactions are appropriately configured before deploying IT changes into production systems. Existing processes to administer certification is time consuming which can cause delays in participants going live with systems changes. AEMO has developed a new optional feature to support a self-service process. The proposed change involves updating the documentation to reflect this new optional feature.
2. The Scheme document that requires the amendment is the AEMO Specification Pack and involves two artefacts (i) Connectivity Testing and Technical Certification (SA and WA) and; (ii) Specification Pack Usage Guidelines.
3. The following is an extract from the both these documents showing the changes in “track change” mode with ~~red strikeout~~ meaning “delete” and blue underline meaning “insert”

The Connectivity Testing and Technical Certification (SA and WA) changes are:

1.2 Certification Pre-requisites

Applicants will need to create and register a test gateway and back end system, and connect it to the FRC Gas Test Hub to enable certification to take place. Instructions for gateway registration and connection are contained in the FRC Gas Hub Participant User Guide, available on the AEMO website at <http://www.aemo.com.au/-/media/Files/PDF/FRC-Hub-Participant-User-Guide.ashx> www.aemo.com.au/retailops/0700-0039.pdf

1.3 Certification Processes



1.3.1 New Participant Certification

Applicants will follow these steps to be eligible for certification:

- Applicants will obtain the AEMO Specification Pack and Information Pack containing process flows, interface definitions and details of system architecture from AEMO;
- Applicants will obtain an FRC Gas Hub Participant User Guide and Registration Form from AEMO;
- Applicants connect their test gateway to the FRC ~~Test~~ [PreProduction](#) Hub. The FRC Hub Operator will make available a 'Sandpit' environment for preliminary testing prior to formal certification on the Certification Responder;
- Two stages of formal testing will be conducted by the applicant. These stages are described as Window 1 (messaging capability) and Window 2 (transaction capability). ~~An applicant will need to have successfully completed Window 1 before commencing Window 2;~~
- The applicant ~~should notify the FRC Hub Operator of the time at which the applicant plans to undertake certification;~~ [can commence certification at any time](#);
- Once the applicant has completed ~~either both~~ of the Windows [\(where required\)](#), [they must first check the certification has passed via the Certification Checker, and should note the start and end time of the certification run so transactions/messages can be analysed later; it must notify the FRC Hub Operator of the time at which it started and stopped sending transactions for certification ; and](#)
- [The Participant should then request a final review by FBSAdmin via email to Support Hub; and](#)
- The FRC Hub Operator will then analyse the results of the process and will issue a report to the applicant and to AEMO.

1.3.1.1 Certification Window 1 – Messaging [\(ebXML\)](#)

1.3.1.3. Certification Notification

When these procedures have been completed, [the applicant will check the certification has passed by utilising the Certification Checker](#). The applicant will [then](#) advise the FRC Hub Operator, which will review the results of the certification process. When an applicant has been successful, the FRC Hub Operator will produce a report advising the applicant and AEMO of the results of the certification process.

4. Contact Information

Below are the contact details for AEMO for matters in relation to:

- Certification of FRC Transactions routed via the FRC
- Certification of FRC Transactions routed via the GRMS FTP Gateway
- Certification of FRC Transactions routed via AEMO [GRMS](#) Low Volume Interface

For South Australia and Western Australia

AEMO Contact

Gas Retail Market Operations

Email: supporthub@aemo.com.au

Ph: 1300 236 600

Hub Operator Contact

AEMO FBS Administration

Email: ~~FBSAdmin~~support.hub@aemo.com.au

Ph: 1300 236 600

The Specification Pack Usage Guidelines (SA and WA) changes are:

2. Overview of the AEMO Specification Pack

The following table provides an overview of the AEMO Specification Pack. The documents are provided in a directory structure as follows:

Main Directory	Sub-Directory	Documents	Version
Specification Pack	1. Usage Guidelines	Specification Pack Usage Guidelines	6. 3 <u>4</u>
	2. Interface Control Document (ICD)	Interface Control Document	4.6
	3. B2B System Interface Definitions	FRC B2B System Interface Definitions	4.1
	4. Transport Layer	FRC B2M-B2B Hub System Specifications	3.8
		FRC B2M-B2B Hub System Architecture	3.5
	5. CSV File Format	FRC CSV Data Format Specification	3.3
	6. Connectivity and Technical Certification	Connectivity Testing and Technical Certification	3. 5 <u>6</u>
	7. Readiness Criteria	Readiness Criteria	2.2
	8. Service Order Specifications	B2B Service Order Specifications, Part 1 and Part 2,	2. 33.3
	9. aseXML Schemas	The complete set of aseXML schemas and examples which participants have subscribed to for SA / WA Gas is available from www.aemo.com.au/asexml	SA – R29 WA – R13

4. There is no additional information to submit with this application.