

# **IMPACT & IMPLEMENTATION REPORT – SUMMARY SECTION**

(For AEMO to complete and administer)

Issue Number	IN025/12				
Impacted Jurisdiction (s)	Queensland				
Proponent	Nandu Datar	Company	AEMO		
Affected Gas Markets(s)     Retail     Wholesale     Bulletin Board     STTM	Gas Retail	Consultation process (Ordinary or Expedited)	Ordinary		
Industry Consultative forum(s) used	GRCF	Date Industry Consultative forum(s)consultation concluded	17 March 2015		
Short Description of change(s)	Queensland RoLR Procedures				
Procedure(s) or Documentation impacted	Retail Market Procedures (QLD) Participant Build Pack 4				
Summary of the change(s)	The changes involve:  (i) amendments to Retail Market Procedures (RMP) (QLD) and Participant Build Pack 4 (PBP4) for the operation and implementation of RoLR scheme; and  (ii) modification to Distributors and Retailer systems to support the arrangement as prescribed in the RMP and PBP4.  These changes are required in order to achieve compliance with the regulatory obligations prescribed under section 144 of the National Energy Retail Law (NERL) that takes effect in the Queensland on 1 July 2015.				
I&IR Prepared By	Nandu Datar Approved By Roy Kaplan				
Date I&IR published	15 April 2015	Date Consultation under 135EE or 135EF concludes	13 May 2015		
Contact address for written responses	Nandu Datar, Level 22, 530 Collins Street, MELBOURNE VIC 3000 GPO Box 2008, MELBOURNE VIC 3001				
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# **IMPACT & IMPLEMENTATION REPORT – DETAILED REPORT SECTION**

CRITICAL EXAMINATION OF PROPOSAL					
1. Description of change(s) and reasons for change(s)	This Impact and Implementation Report (IIR) describes the changes required to the Retail Market Procedures (Queensland) (RMP-Q) and Participant Build Pack (PBP4) for the operation and implementation of the RoLR scheme in the Queensland gas retail market.				
	To fulfil these new procedural obligations, Retailers that are covered by the RoLR scheme as per National Energy Retail Law – Queensland (NERL-Q) and the Retailer that takes on default RoLR obligations will need to make minor modification to their systems.				
	Majority of Queensland participants supported the idea of adopting the existing Victorian and South Australian RoLR functionality for Queensland. The rational for taking this approach was AEMO, Distributors and Retailers can leverage off existing systems and processes therefore making this automated solution the most cost effective.				
2. Reference documentation	RMP-Q: addition of Chapter 10 and supporting definitions. PBP4: addition of new obligations.				
<ul> <li>Procedure Reference</li> <li>GIP/Specification         Pack Reference     </li> <li>Other Reference</li> </ul>	Gas Interface Protocol (Queensland) (GIP): updates to the version number of RMP and PBP4.				
3. The high level details	Below is a summary of the proposed changes to RMP-Q.				
of the change(s) to the existing Procedures	Amend Retail Market Procedure (QLD) to:				
This includes:	<ul> <li>Add new definitions in Section 1.1.1</li> <li>Add new Chapter 10 Retailer of Last Resort</li> <li>The full details of the changes are described in attachment A.</li> </ul>				
<ul> <li>A comparison of the existing operation of the Procedures to the</li> </ul>	Below is a summary of the proposed changes to the technical artefacts contained in the Gas Interface Protocol (GIP).				
proposed change to	Amend PBP 4 - Queensland to:				
the operation of the Procedures  A marked up version of the Procedure change (see Attachment A)	<ul> <li>Add new obligations to Chapter 3 Transactions not required for Queensland</li> <li>Add new obligations to Chapter 4 Transactions to be Modified for Queensland</li> <li>The full details of the changes are described in attachment B.</li> </ul>				
,,	Below is a summary of the proposed changes to GIP				
	<ul> <li>Updated version number of RMP and PBP4.</li> </ul>				
	The full details of the changes are described in attachment C.				

# 4. Explanation regarding the order of magnitude of the change

(eg: material, nonmaterial or nonsubstantial) Based on the advice provided to AEMO by Queensland industry participants during the Proposed Procedure Change (PPC) consultations and AEMO's own assessment that the IT system and process changes are not overly complex and do not involve any aseXML schema changes therefore are considered minor in nature. The system change only involves Queensland participants.

There are no additional IT systems changes for AEMO as the IT system functionally to support a Queensland RoLR event was previously implemented when NECF changes were implemented in October 2012.

Taking into account the above, the order of magnitude for a change of this nature is non-material.

ASSESSMENT OF LIKELY EFFECT OF PROPOSAL				
, , ,	Stakeholder Consultation			
benefit (tangible / intangible / risk) analysis	As prescribed in the 'Approved Process', regis			

As prescribed in the 'Approved Process', registered participants and interested stakeholders were requested to complete submissions to the PPC. Submissions to the PPC closed on 17 March 2015. Three registered participants in the Queensland retail market submitted a response to the PPC supporting implementation of this change.

#### Impact Assessment

Implementation of this change is supported by all respondents. The participants indicated minor system / training business process impacts.

#### Scale of Importance of Change

This is a legislative requirement and the changes have to be implemented by the industry by 1 July 2015.

#### Costs Benefit Assessment (CBA)

Given that the proposed change is a legislative requirement and the fact that Participants provided advice that the proposed solution was the most cost effective design to adopt for Queensland a CBA is not warranted in this instance.

6. The likely implementation effect of the change(s) on stakeholders

and/or cost estimates

The proposed changes will require a Retailer that is covered by the RoLR scheme as per NERL-Q, to submit Customer and Site Details data to AEMO on monthly basis and receive and interpret the MIBB report containing outcome of validation of this data file.

(e.g. Industry or endusers)

The proposed amendments do not require any changes to AEMO systems.

The participants currently operating in the Queensland Retail Gas Market also operate in other jurisdictions with operational RoLR scheme under the NERL. The participants have responded that they intend to reuse components of the system being used in jurisdictions with RoLR facility with minor updates.

Any new participant entering the Queensland retail market will need to ensure that they are compliant with the RMP-Q and GIP. The GIP provides various ways in which the participants can provide the data to AEMO for the purposes of the RoLR scheme.

#### 7. Testing requirements

The testing will involve participation by AEMO as the market operator, one Distributor and two Retailers, where one of them being the failed retailer and the other being nominated RoLR.

The participant's responses have indicated that they have processes in place to handle a potential RoLR event effective 1 July 2015 manually, consistent with the changes proposed in this IIR.

The testing will be scheduled following completion of the system

	changes by all participants to automate the handling of a RoLR event. The earliest this is expected to happen is quarter 4 of 2015.
8. AEMO's preliminary assessment of the proposal's compliance with section 135EB:  - consistency with NGL and NGR, - regard to national gas objective - regard to any applicable access arrangements	Consistency with NGL and NGR:  AEMO's view is that the proposed changes are consistent with the NGL and NGR.  National gas objective  "Promote efficient investment in, and efficient operation and use of, natural gas services for the long term interests of consumers of natural gas with respect to price, quality, safety, reliability and security of supply of natural gas."  It is AEMO's view that this change will ensure AEMO and industry participants operating in the Queensland jurisdiction will be compliant with the NERL.  Applicable access arrangements  AEMO's view is that the proposed changes are not in conflict with existing Access Arrangements. No Distributor raised any concerns with the proposed amendments in relation to their Access Arrangement.
9. Consultation Forum Outcomes  (e.g. the conclusions made on the change(s) whether there was unanimous approval, any dissenting views)	The GRCF and the RBPWG are standing forums for providing effective and efficient consultation with stakeholders on development of the Queensland Gas Retail Market.  GRCF developed elements of this proposed change (prior to the formal consultation) over the period October to December 2014. In January 2015, a Gas Market Issue (GMI) paper describing the procedure changes was circulated to the GRCF participants recommending that this proposal progress to the formal consultation stage (Proposed Procedure Change - PPC). No Participant opposed this recommendation.  Attachment D is summary of the responses that AEMO has received from participants in response to the Proposed Procedure Change (PPC) consultation.

RECOMMENDATION(S)					
10. Should the proposed Procedures be made, (with or without amendments)?	AEMO recommends that the proposed amendments to the procedures as described in Attachments A to C should be made with amendments as per the PPC feedback in attachment D.				
11. If applicable, a proposed effective date for the proposed change(s) to take effect and justification for that timeline.	<ul> <li>The consultation timeline for the proposed changes is as follows:</li> <li>IIR released: 15 April 2015</li> <li>IIR submissions due: 13 May 2015</li> <li>AEMO decision: 3 June 2015</li> <li>Effective date: 1 July 2015</li> </ul>				

#### ATTACHMENT A - PROPOSED CHANGES RETAIL MARKET PROCEDURES (QLD)

Blue represents additions Red and strikeout represents deletions – Marked up changes

#### **Additions in section 1.1.1**

designated RoLR has the same meaning as in Part 6 of the National Energy Retail

Law.

failed Retailer has the same meaning as in National Energy Retail Law

(Queensland).

insolvency official has the same meaning as in Part 6 of the National Energy Retail

Law.

RoLR event has the same meaning as in Part 6 of the National Energy Retail

Law.

RoLR gas day is the gas day that the RoLR event occurs.

service order means a request from a User requesting that the Distributor

undertake the delivery of a service.

service order in means a listing created and administered by a Distributor that comprises a number of data attributes as defined in the Gas

comprises a number of data attributes as defined in the Gas Interface Protocol of every MIRN that the failed Retailer has initiated a service order and the Distributor has yet to complete

the request.

<u>small customer</u> <u>has the same meaning as in the National Energy Retail Law.</u>

Addition: Chapter 10

#### CHAPTER 10 RETAILER OF LAST RESORT

#### 10.1 Retailer of Last Resort Event

A RoLR event is defined under Part 6 of the National Energy Retail Law and when this event occurs, clauses 10.1.1 to 10.1.8 applies.

#### **10.1.1 Cancelled and Accelerated Customer Transfers**

AEMO must as soon as practicable, in relation to a lodged or pending transfer request:

- (a) where the prospective FRO is the failed Retailer, cancel all transfer requests and deliver a notice of the withdrawal of the transfer request, to the FRO, the prospective FRO and the Distributor for the supply point to which the transfer request relates;
- (b) where the MIRN, that is subject to a transfer request, has the failed Retailer recorded as the FRO and the transfer request contains a Customer no-change statement, accelerate the transfer request and deliver a notice of the registration of the transfer request to the

- prospective FRO, the FRO and the Distributor for the supply point to which the transfer request relates;
- (c) where the MIRN, that is subject to a transfer request, has the failed Retailer recorded as the FRO and does not contain a Customer nochange statement and;
  - (i) if the prospective transfer date is ten days or less before the RoLR gas day, AEMO must accelerate the transfer request and deliver a notice of the registration of the transfer request to the prospective FRO, the FRO and the Distributor for the supply point to which the transfer request relates; or
  - (ii) if the prospective transfer date is more than ten days before the RoLR gas day, AEMO will allow the transfer request to be processed as normal and the MIRN relating to that transfer request will be included in the metering register update process described in clause 10.1.2.

#### 10.1.2 Metering Register Update

Before commencement of the *RoLR gas day*, for each *MIRN* for which the failed Retailer is recorded as the *FRO* and to which clause 10.1.1 does not apply, *AEMO* must amend the *metering register* by recording the *designated RoLR* as the *FRO*.

#### 10.1.3 MIRN Database Update

#### The *Distributor* must:

- (a) for each MIRN for which the failed Retailer is recorded as the FRO and to which clause 10.1.1 does not apply, the Distributor must amend the MIRN database by recording the designated RoLR as the FRO:
- (b) <u>provide AEMO with a report of the details of each MIRN that has been updated in the MIRN database; and</u>
- (c) where the failed Retailer is the local area retailer of the Distributor, provide AEMO with details of those MIRNs.

#### 10.1.4 Data Exchange

#### AEMO must provide:

- (a) each designated RoLR a file containing customer details using the most recently received complete customer listing for the MIRNs for which they have become the FRO in accordance with the Gas Interface Protocol; and
- (b) each *Distributor* details of the *MIRNs* where in accordance with clause 10.1.2 *AEMO* has updated the *metering register* with the *designated RoLR* as the *FRO* and deliver that file in accordance with the *Gas Interface Protocol*.

#### 10.1.5 <u>Data Exchange from Failed Retailer</u>

Before commencement of the *RoLR gas day*, the *failed Retailer* or its *insolvency official* must provide each *designated RoLR* a file containing customer details for the *MIRNs* for which they will become the *FRO* in accordance with the *Gas Interface Protocol*.

#### 10.1.6 Meter Reading and Account Creation

For each MIRN that the designated RoLR has become the FRO, the Distributor must:

- (a) <u>calculate an estimated meter reading for RoLR gas day and provide it</u> to AEMO, the *designated RoLR* and the *failed Retailer*, and
- (b) calculate the energy data information for *RoLR gas day* as described in clause 2.6.2(a) and provide to AEMO and the *failed Retailer*, and
- (c) <u>provide the designated RoLR</u> the current information set out in clause 3.1.1(a) to 3.1.1(m);
- (d) and provide the information in accordance with the Gas Interface

  Protocol as soon as practicable but no later than 7 calendar days after the RoLR gas day.

#### 10.1.7 Updates to Estimated Meter Reading

- (a) Each Distributor must provide any updates to estimated data provided under clause 10.1.6(b), (c) and (d) to AEMO, the failed Retailer and designated RoLR.
- (b) The updates must be provided as soon as it is practical to do so, but in any event no later than on the last settlement business day of the ninth month after the relevant billing period in which the RoLR gas day occurs.

#### **10.1.8 Service Order Processes**

Where a *Distributor* has not yet completed *service orders* that were initiated prior to *RoLR gas day* by the *failed Retailer*, the *Distributor* in accordance with the *Gas Interface Protocol* must provide a *service order in flight report* to the *designated RoLR*.

#### 10.1.9 Industry reconciliation program

Before the 65th business day after the RoLR gas day and after consulting with affected Retailers and Distributors, AEMO must determine if an industry reconciliation program is required.

Note: This clause places an obligation on AEMO to determine the need for a reconciliation of the customer transfers that have occurred after a RoLR event to ensure that customers have been transferred to the correct Retailer of Last Resort and that the Distributors', Retailers' and AEMO's databases are aligned. The intention is to perform an exercise that would identify and correct any errors. The 65 business day period is to allow for at least one billing cycle to have occurred after the RoLR gas day so that Retailers can assess the financial implications of performing a reconciliation.

# ATTACHMENT B - PROPOSED CHANGES PARTICIPANT BUILD PACK 4

Blue represents additions Red and strikeout represents deletions – Marked up changes

# 3 Transactions not required for Queensland

The following table shows the transactions, from the Table of Transactions (Participants Build Pack 1) which are not used in the Queensland Retail Market.

	Table of Transactions					
Ref No	Transaction Type					
15	Disconnection Read					
17A	Energy flow for Disconnection Read Response					
39	Heating value for the day					
56	MIBB – INT91					
57	Heating Value for the day					
186	Transfer Notice					
195	Objection notification or objection withdrawal notification					
199	Transfer cancellation					
201	Problem notice					
209	Withdrawal Transfer Notice					
213	Notice of Read Failure					
221	New Transfer Date					
225	Transfer Termination Notice					
230	Notice of Transfer					
265	MIBB – INT254					
266	MIBB – INT91					
267	MIBB – INT171					
296	Allocation of numbers for MIRNs for TPO					
297	MIRN standing data for TPO					
335	Metering Data Monthly					
336A	Retailer Churn					
334	Network DUoS Billing Details (Tariff H)					
356	Obtain CFRO for MRM and/or SDR					
900- 1060	Transactions relating to Retailer of Last Resort					

#### 4 Transactions to be modified for Queensland

Following transactions are modified for Queensland Retail Market requirements. These transactions are used for the same purpose as the Victorian market but there may be minor changes to the data elements. The table below shows the modified transaction from the Table of Transactions.

Transac	Transaction Table					
Ref No	Transaction Type					
87	Meter Fix Request "Simple" or "Complex" type					
170	Initiate Transfer Request					
200	Problem Notice					
332	Network Duos billing details – tariff D					
181	CATS DataRequest					
310	Service Connection Request					
900	Transaction related to Retailer of Last Resort					

#### 4.15 Customer and Site Details (T900)

Only retailers covered by the RoLR scheme according to National Energy Retail Law (Queensland) are required to provide transaction T900 (Customer and Site Details).

#### ATTACHMENT C - PROPOSED GIP CHANGES

<u>Blue</u> represents additions **Red** and strikeout represents deletions – Marked up changes

# Gas Interface Protocol artefacts to take effect as of 01 April 2014 1 July 2015

GIP Item #	Category	Documents	Version
1	Retail Market Procedures (Queensland)	Queensland Retail Market Procedures	<del>9.0-</del> 11.0
2	Participants Build Pack 4	The Queensland Specific Participant Build Pack 4	<del>8.0</del> -9.0
3	Deleted		
4	Participant Build Pack 1	AEMO Process Flow Table of Transactions This contains: - Table of Transactions, Table of Elements, List of Job Enquiry Codes, Address Elements and MIRN and Meter states.	3.2
5	Participant Build Pack 1	Process Flow Diagrams	3.3
6	Participant Build Pack 1	CSV Data Format Specification	3.3
7	Participant Build Pack 2	Participant Build Pack 2 Interface Definitions	3.4
8	Participant Build Pack 2	Participant Build Pack 2 Usage Guide	3.0
9	Participant Build Pack 2	Participant Build Pack 2 Glossary	3.1
10	Participant Build Pack 3	B2B System Specification	3.0
11	Participant Build Pack 3	B2B System Architecture	3.1
12	Participant Build Pack 3	Interface Definitions	3.3
13	Guidelines for Development of A Standard for Energy Transactions in XML (aseXML)	The Guidelines for Development of A Standard for Energy Transactions in XML (aseXML) which participants have subscribed to for Victorian Gas is available from <a href="http://www.aemo.com.au/asexml/">http://www.aemo.com.au/asexml/</a>	<del>3.2 4</del> .1
14 AseXML Schemas		The complete set of aseXML schemas and examples which participants have subscribed to for Victorian Gas is available from http://www.aemo.com.au/asexml/	R29

# ATTACHMENT D – Submissions Received for Change

SU	SUBMISSIONS RELATING TO THE PPC 23 FEBRUARY TO 17 MARCH – ORIGINAL CONSULTATION PERIOD						
	DATE	PARTICIPANT	SUBMISSION	N -	AEMO COMMENTS		
1	27 Feb 2015	AGL	amendments: Delete the roy 1060 from the into chapter 4 AGL suggests Insert reference for chapter Provide a explanation transaction See below for Chapter 3  Table of Transaction	w designating transaction 900 – e table in chapter 3 and insert l. s the following changes: erence for transactions into table er 4; new section with additional on of requirements for these ens. r suggested changes.	In relation to the PBP4:  The suggested amendments proposed by AGL are non-contentious and adds further clarity to the PBP4 therefore AEMO has no issue in including these suggested changes with minor amendments.		

ATE	PARTICIPANT	SUBMIS	SION	AEMO COMMENTS
		39	Heating value for the day	
		56	MIBB – INT91	
		57	Heating Value for the day	
		186	Transfer Notice	
		195	Objection notification or	
			objection withdrawal notification	
		199	Transfer cancellation	
		201	Problem notice	
		209	Withdrawal Transfer Notice	
		213	Notice of Read Failure	
		221	New Transfer Date	
		225	Transfer Termination Notice	
		230	Notice of Transfer	
		265	MIBB – INT254	
		266	MIBB – INT91	
		267	MIBB – INT171	
		296	Allocation of numbers for MIRNs	
			for TPO	
		297	MIRN standing data for TPO	
		335	Metering Data Monthly	
		336A	Retailer Churn	
		334	Network DUoS Billing Details	
			(Tariff H)	
		356	Obtain CFRO for MRM and/or	
			SDR	
		<del>900-</del>	Transactions relating to Retailer	
		<del>1060</del>	of Last Resort (only for retailers	
			not contemplated to fail	

ATE P	ARTICIPANT	SUBMISS	ION	AEMO COMMENTS
			according to National Energy Retail Law)	
		Chapter 4	ı	
		Transac	tion Table	
		Ref No	Transaction Type	
		87	Meter Fix Request "Simple" or "Complex" type	
		170	Initiate Transfer Request	
		200	Problem Notice	
		332	Network Duos billing details – tariff D	
		181	CATS DataRequest	
		310	Service Connection Request	
		900 - 1060	Transactions relating to retailer of last resort	
		4.15 T9	00 - 1060	
		required to	(Customer and Site Details) is be provided by any retailer who 15% or less of the <i>small</i> gas	

SUE	SUBMISSIONS RELATING TO THE PPC 23 FEBRUARY TO 17 MARCH – ORIGINAL CONSULTATION PERIOD						
	DATE	PARTICIPANT	SUBMISSION	AEMO COMMENTS			
			customers in Queensland (see section 122 of the National Energy Retail Law – definition of failed retailer).				
			For the avoidance of doubt retailers, who sell gas to more than 15% of the small gas customers in Queensland are not required to provide the T900 report.				
			All other reports in this group remain the same.				
2	17 Mar 2015	Origin Energy	In relation to the proposed PBP4 amendments:  Proposed following minor amendments to the PBP4 to improve clarity  Chapter 3  The text in the first column of the last row should be amended as follows;  900–1060	In relation to the PBP4: The suggested amendments proposed by Origin are non-contentious and in line with amendments proposed by AGL as per item 1 above. AEMO has no issue in including these suggested changes.			
3	17 Mar 2015	AEMO Legal	In relation to the proposed RMP-Q amendments:	In relation to the RMP-Q: The failed retailer definition only applies to Queensland and hence AEMO has no issue			

	DATE	PARTICIPANT	SUBMISSION	AEMO COMMENTS
			Section 1.1.1  Amend the definition of failed retailer to make reference to National Energy Retail Law Queensland instead of Part 6 of National Energy Retail Law	in including the suggested changes.
4	17 Mar 2015	AEMO Legal	In relation to the proposed RMP-Q amendments:  Section 10.1.2  Amend the wording from 'Before the RoLR gas day' to 'Before the commencement of the RoLR gas day'  Amend reference to the clause from '9.2.1' to '10.1.1'	In relation to the RMP-Q: The suggested amendments proposed by AEMO Legal are non-contentious and adds further clarity to the RMP-Q therefore AEMO has no issue in including these suggested changes.
5	17 Mar 2015	AEMO Legal	In relation to the proposed RMP-Q amendments: Section 10.1.4 Amend the wording from 'complete customer listing' to 'complete MRN listing'	In relation to the RMP-Q: The suggested amendments proposed by AEMO Legal will not be included as the reference relates to new definitions added via a new chapter 9 to which they did not have access to while providing the feedback.

	DATE	PARTICIPANT	SUBMISSION	AEMO COMMENTS
6	17 Mar 2015	AEMO Legal	In relation to the proposed RMP-Q amendments:  Section 10.1.5  Amend the wording from 'Before the RoLR gas day' to 'Before the commencement of the RoLR gas day'	In relation to the RMP-Q: The suggested amendments proposed by AEMO Legal are non-contentious and adds further clarity to the RMP-Q therefore AEMO has no issue in including these suggested changes.
7	17 Mar 2015	AEMO Legal	In relation to the proposed RMP-Q amendments:  Section 10.1.9  Amend the wording from 'Within' to 'Before' at the beginning of the section  Amend the wording from 'during' to 'after' within the Notes under this section.  Amend the wording from '50 day' to '65 business day' within the Notes under this section.	In relation to the RMP-Q: The suggested amendments proposed by AEMO Legal are non-contentious and adds further clarity to the RMP-Q therefore AEMO has no issue in including these suggested changes.