

# IMPACT & IMPLEMENTATION REPORT (IIR)

## Summary Section.

<b>Issue Number</b>	IN006-17		
<b>Impacted Jurisdiction(s)</b>	South Australia		
<b>Proponent</b>	AEMO	<b>Company</b>	AEMO
<b>Affected Gas Market(s)</b>	<ul style="list-style-type: none"> <li>Retail</li> </ul>	<b>Consultation process (Ordinary or Expedited)</b>	Ordinary
<b>Industry Consultative forum(s) used</b>	GRCF	<b>Date Industry Consultative forum(s) consultation concluded</b>	Thursday, 1 June 2017
<b>Short Description of change(s)</b>	Amend the South Australian (SA) Retail Market Procedures (RMP) so that they more aligned with the other east coast jurisdictions.		
<b>Procedure(s) or Documentation impacted</b>	See Attachment C for a detailed list of the impacted documents.		
<b>Summary of the change(s)</b>	The changes proposed in this Impact and Implementation Report (IIR) involve substantive rewording of many of the existing definition and clauses with the SA RMP. There is also substantive rewording of many of the existing AEMO Specification Pack documents. None of these changes should alter any of the existing obligations placed on participants or AEMO. There is a small IT system changes to AEMO SA system to remove the functionality of maintaining the Small Use Customer Indicator which is no longer used in the SA gas retail market.		
<b>IIR Prepared By</b>	Danny McGowan	<b>Approved By</b>	Michelle Norris
<b>Date IIR published</b>	15 November 2019	<b>Date Consultation under 135EE concludes</b>	13 December 2019
<b>Email Address for Responses</b>	<a href="mailto:grcf@aemo.com.au">grcf@aemo.com.au</a>		



## IMPACT & IMPLEMENTATION REPORT – DETAILED REPORT SECTION

### CRITICAL EXAMINATION OF PROPOSAL

#### 1. DESCRIPTION OF ISSUE

Currently the South Australian (SA) Retail Market Procedures (RMP) are written very differently compared to other east coast jurisdictions.

In mid-2017, SA participants approached AEMO to undertake a review to harmonise the SA RMP with the other gas retail market jurisdictions. With the support of the Gas Retail Consultation Forum (GRCF), this initiative was added to the GRCF program of work and a set of guiding principles (see Attachment A) were developed and agreed. In late 2017 a sub group of subject matter experts was formed comprising GRCF representatives from organisations that are registered in the SA Retail Market to assist AEMO progress this initiative.

The first draft of the harmonised SA RMPs was issued to the sub group in early 2018 inviting feedback. In identifying opportunities to harmonise the SA RMPs, several changes to other procedures and technical protocols were identified (see Section 2 for further details). In developing the draft harmonised SA RMPs detailed in this PPC, four earlier drafts of the harmonised SA RMPs, procedures and technical protocols were reviewed by the GRCF sub group. Feedback from the sub group on the fourth and final draft of the SA RMP concluded on 30 August 2019 with AEMO making further changes which were minor in nature.

Given the earlier drafts and substantively reduced feedback from the sub group in the final draft, AEMO has decided to commence the formal consultation process. In early October 2019, AEMO issued a Proposed Procedure Change (PPC) that detailed the changes to the procedures and technical protocols and invited anyone to make a submission. Section 8 of this IIR details the outcome of the PPC consultation.

The changes proposed in this IIR involve aligning the SA RMPs with RMPs in other east coast jurisdictions which involves substantive rewording of many of the existing definitions and clauses. None of these changes are intended to alter any of the existing obligations placed on participants or AEMO.

These changes contribute to AEMO's and industry's long term aim to increase consistency between the regulatory frameworks for all retail gas markets and creates efficiency for those participants operating in multiple gas retail markets.

Anyone wishing to make a submission for this second and final stage consultation are to use the response template provided in Attachment B. Submissions close Friday 13<sup>th</sup> December 2019 and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

#### 2. REFERENCE DOCUMENTATION

Attachment C is the reference documentation which provides a detailed summary of the changes across each of the SA RMPs, other procedures and technical protocol.

#### 3. OVERVIEW OF CHANGES

As noted in Section 1 of this IIR, the proposed changes focus on harmonising the SA RMPs with the other east coast jurisdictions. The harmonised versions of the SA RMPs, other procedures and technical protocol changes are included in Attachment E.

As noted in Section 2 of this IIR, the table in Attachment C provides a summary of changes across each of the SA RMPs, other procedures and technical protocol. All changes in described in Attachment E are documentation changes only and have no IT system or material business process impact on participants.



#### **4. LIKELY IMPLEMENTATION EFFECTS AND REQUIREMENTS**

For participants the proposed changes represent documentation changes only and participants will not be required to make any modifications to their existing systems or business processes.

For AEMO these change predominantly represent documentation changes, however there is a small IT system change to AEMO SA system required to remove the functionality of maintaining the Small Use Customer Indicator.

#### **5. OVERALL COST AND BENEFITS**

As part of the first-round consultation (PPC), AEMO put forward the following assessment regarding the overall costs and benefits:

*Since these changes have not identified any market impacts, AEMO does not expect there to be any participant costs as a result of executing them. AEMO will incur a minor cost estimated to be around \$10,000 to make minor IT system changes to remove the functionality of maintaining the Small Use Customer Indicator and changes to Specification Pack artefacts that AEMO outsources to its IT service provider to maintain.*

*In terms of benefits, there are no tangible benefits however the following intangible benefits are likely to be realised:*

- *Increased consistency within the retail gas regulatory framework for the east coast jurisdictions;*
- *More uniform RMPs across all jurisdictions will reduce the complexities normally associated with entering gas retail markets, particularly for those retailers wanting to operate in SA; and*
- *Clear and easy to understand RMPs, which (in addition to ensuring clarity for existing participants) will lower barriers to entry for new participants.*

No participant put forward any opposing views in relation to AEMO assessment of the costs and benefits during the first-round consultation. AEMO is still of the view that its original assessment is accurate and there is not anticipated to be any participant costs and that the overall industry benefits will outweigh the minor cost that AEMO will incur.

#### **6. MAGNITUDE OF THE CHANGES**

Given there should be no participant costs and minimal AEMO costs, AEMO has assessed these changes to be non-material.

#### **7. AEMO'S PRELIMINARY 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:

1. *Consistency with National Gas Law (NGL) and NGR:*

*AEMO's view is that the proposed change is consistent with the NGL and NGR because the proposed change promotes consistency across the four east coast jurisdictions.*



2. *National gas objective:*

*It is AEMO's view that this change removes any costs associated with unnecessary differences in process and procedures and is in the long-term interests of consumers as it promotes clarity and consistency for gas retail market participants.*

3. *Applicable access arrangements:*

*AEMO's view is that the proposed change is not in conflict with existing Access Arrangements.*

No participant put forward any opposing views in relation to AEMO assessment during the first-round consultation therefore AEMO maintains its original assessment described in the previous points as noted above.

## **8. CONSULTATION FORUM OUTCOMES**

On 14 October 2019 AEMO published on its website a PPC that put forward changes to several documents described in Attachment C. The proposed changes involve aligning the SA RMPs with RMPs in other east coast jurisdictions which involves substantive rewording of many of the existing definitions and clauses. Registered participants and interested stakeholders were invited to make submissions which closed on 1 November 2019. Submissions were received from Origin Energy and AGL. Origin Energy submission noted they accepted the proposed changes.

AGL and AEMO have proposed additional changes and a summary on of these changes and AEMO's response to each proposal is contained in Attachment D.

## **IMPACT & IMPLEMENTATION REPORT – RECOMMENDATIONS**

### **9. SHOULD THE PROPOSED PROCEDURES BE MADE**

AEMO recommends the changes proposed in Attachment E. This includes the additional changes put forward during the first-round consultation. These additional changes are described in Attachment D.

### **10. PROPOSED TIMELINES**

Subject to all necessary approvals, AEMO will implement the changes described in this IIR on 10 February 2020. In order to achieve this timeline, AEMO proposes the following key milestones:

- Issue Impact and Implementation Report (IIR) on Friday 15<sup>th</sup> November 2019;
- Submissions on IIR close Friday 13<sup>th</sup> December 2019;
- AEMO decision on Friday 10<sup>th</sup> January 2020; and
- Effective date Monday 10<sup>th</sup> February 2020.



## **ATTACHMENT A – GUIDING PRINCIPLES TO HARMONISE THE SA RMPs**

The following is the agreed set of guiding principles established by the GRCF to harmonise the SA RMPs:

- a) No change to existing substantive obligations, and no new obligations added.
- b) Where obligations are substantially the same, the wording contained in the NSW/ACT procedure clauses will be used as the foundation to update SA procedures where this can readily be achieved without potentially changing the obligation.
- c) There will be sets of obligations that are similar and may be capable of further harmonisation (e.g. detailed meter reading/metering data, allocation/reconciliation), but identifying any necessary differences will require detailed analysis by all participants and as such is excluded from scope. A further harmonisation stage will likely be required.
- d) Matters of detail concerning notices, services orders and other communications/transactions that are covered by the Gas Interface Protocol (GIP) in other jurisdictions should generally be addressed by the AEMO Specification Pack in SA and removed from the SA RMPs.
- e) If an equivalent or superior head of power for an obligation exists elsewhere within the regulatory framework (example National Gas Rules (NGR), Law, jurisdictional regulation, etc), such provisions will not be replicated in the SA RMP. Any inconsistencies will need to be resolved.
- f) Matters that are not consistent with the nature of the RMPs as contemplated under the NGL regime should be removed or modified as appropriate (e.g. provisions of a contractual nature, enforcement matters).
- g) Due to the number of changes, moved clauses, changed numbering conventions and deletions, a marked-up version showing the differences between the current version and the revised harmonised SA RMP will not be provided.



## **ATTACHMENT B – IIR RESPONSE TEMPLATE**

The IIR response template has been attached separately to this document. There are two sections within the template:

- Section 1 seeks feedback on the on the IIR; and
- Section 2 seeks feedback on the individual changes within each of the procedures.

Anyone wishing to make a submission for this final stage consultation are to use this response template. Submissions close 13 December 2019 and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

## ATTACHMENT C – REFERENCE DOCUMENTATION (SEE SECTION 2)

The rows in the table below that are shaded in yellow (Reference # 1 to 8 inclusive) are documents that need to follow the RMP consultation process.

The rows that are not shaded (Reference # 9 to 10 inclusive) are reference material only.

Ref#	Title of document and any notes.	Ver #	Summary of the change
1	SA RMPs.  The summary of changes provides a high-level description of the changes between version 16 and 17. These are <u>not</u> shown as “marked up” in the SA RMP referred to in Attachment E. The SA RMP referred to in Attachment E shows the marked-up changes from the version at accompanied the PPC issued on 14 October 2019. Also, this version includes comments that references old clause number in version 16.	17.0	<ol style="list-style-type: none"> <li>1. Old clause - clause 2 (Definitions) New clause 1.2.1 <ul style="list-style-type: none"> <li>• Lots of rewording and removal of definitions that are no longer required or covered in AEMO Spec Pack (FRC B2M B2B Hub System Specifications, SA/WA Interface Control Document (ICD), FRC B2B System Interface Definitions) and additional definition added.</li> </ul> </li> <li>2. Part 1.3 Old Clauses 8 to 12 (Notices) <ul style="list-style-type: none"> <li>• Moved across or already covered in to AEMO Spec Pack documents (Example section 2.5.5 of the “FRC B2M B2B Hub System Specifications covers notices despatched for aseXML transaction (immediately or promptly)).</li> </ul> </li> <li>3. Part 1.4 (These Procedures and other instruments) <ul style="list-style-type: none"> <li>• Old Clause 14B (FRC HUB Operating Terms and Conditions). New clause 1.3.4 <ul style="list-style-type: none"> <li>◦ Applying the Gas FRC B2B Connectivity Testing and System Certification approach which applies in Vic, QLD and NSW/ACT to SA.</li> </ul> </li> </ul> </li> <li>4. Part 2.1 (The AEMO Registry) <ul style="list-style-type: none"> <li>• Old clause 20 (AEMO standing data). New clause 2.3.1. <ul style="list-style-type: none"> <li>◦ The reference to information source for each attribute is removed. The reference to small use customer indicator is gone. This indicator no longer needs to be maintained.</li> </ul> </li> <li>• Old clause 21B (Readiness certification). New clause 1.3.4. <ul style="list-style-type: none"> <li>◦ See dot point 3. Certification of FRC transactions routed via the GRMS FTP Gateway is a mandatory activity for Retailers but optional for Self-Contracting Users (SCU). See section 5 of updated Gas FRC B2B Connectivity Testing and System Certification</li> </ul> </li> <li>• Old clause 23 (AEMO to provide bulk AEMO standing data).</li> </ul> </li> </ol>



Ref#	Title of document and any notes.	Ver #	Summary of the change
			<ul style="list-style-type: none"> <li>○ Deleted as Standing Data requirements including the timing provision in a centralised location such as the ICD (section 8.7.3 and 8.7.4).</li> <li>5. Part 2.2 (Changing the AEMO Registry)               <ul style="list-style-type: none"> <li>● Old Div 2.2.1 (Obligation to Keep AEMO Registry Accurate) and 2.2.2 (Data Change Notices) old clause 24 to 31.                   <ul style="list-style-type: none"> <li>○ Removed. Covered in the AEMO Spec Pack therefore doesn't need to be in RMP as well.</li> </ul> </li> <li>● Old Div 2.2.3 (Error correction notice). Old Clause 32 to 48. New clause 9.1.1 to 9.1.13.                   <ul style="list-style-type: none"> <li>○ Scope only relates to transfers which is the same as NSW/ACT.</li> </ul> </li> <li>● Old Div 2.2.5 (Updating AEMO Registry and Provision of AEMO Standing Data). Old clause 49 to 53.                   <ul style="list-style-type: none"> <li>○ Removed. Covered in the AEMO Spec Pack (ICD) therefore doesn't need to be in RMP as well. Part 2.1 (The AEMO Registry)</li> </ul> </li> </ul> </li> <li>6. Part 3.1 (New Connections)               <ul style="list-style-type: none"> <li>● Old clauses 63 to 69. New clause 2.1 and 4.1.                   <ul style="list-style-type: none"> <li>○ Largely rewritten.</li> </ul> </li> </ul> </li> <li>7. 7. Part 3.3 (Transfers)               <ul style="list-style-type: none"> <li>● Old clauses 77 to 103. New clause 6.1 to 6.8                   <ul style="list-style-type: none"> <li>○ The "if the transfer is "not validated" / valid" has been simplified.</li> </ul> </li> </ul> </li> <li>8. Part 3.5 (Disconnection and Reconnection of Delivery Points)               <ul style="list-style-type: none"> <li>● Old clauses 105 to 124. New clause 4.2                   <ul style="list-style-type: none"> <li>○ Some definitional changes (eg "Disconnection notice" becomes "de energisation request"). Removal of confirmation notices as these are covered in AEMO Spec Pack.</li> </ul> </li> </ul> </li> <li>9. Part 3.6 (Removing Delivery Points and Deregistering MIRNs)               <ul style="list-style-type: none"> <li>● Old clauses 125 to 133. New clause 4.4 to 4.5                   <ul style="list-style-type: none"> <li>○ Some definitional changes (eg "Permanent removal request" becomes "deregistration request"). Removal of confirmation notices as these are covered in AEMO Spec Pack. Largely unchanged.</li> </ul> </li> </ul> </li> <li>10. Part 4.1 (Metering Equipment), Part 4.2 (Meter Reading Requirements), Part 4.3 (Gate Point Metering Data), Part 4.4 (Metering Data), Part 4.5 (Heating Value Data)</li> </ul>





Ref#	Title of document and any notes.	Ver #	Summary of the change
			<ul style="list-style-type: none"> <li>• Old clauses 134 to 171. New clause 3.1 to 3.9               <ul style="list-style-type: none"> <li>◦ Some definitional changes (eg “energy value” becomes “consumed energy”). Largely unchanged.</li> </ul> </li> <li>11. Chapter 5 (Allocation and Reconciliation),               <ul style="list-style-type: none"> <li>• Old clauses 171A to 308. New clause 8.1 to 8.10.                   <ul style="list-style-type: none"> <li>◦ Largely unchanged, however redundant provisions like 301A have been deleted.</li> </ul> </li> </ul> </li> <li>12. Chapter 6 (Compliance and Interpretation),               <ul style="list-style-type: none"> <li>• Old clauses 309 to 348.                   <ul style="list-style-type: none"> <li>◦ Deleted.</li> </ul> </li> </ul> </li> <li>13. Chapter 7 (Reporting and Audits),               <ul style="list-style-type: none"> <li>• Old clauses 349 to 361A. New clause 1.5, 7.1                   <ul style="list-style-type: none"> <li>◦ Largely unchanged</li> </ul> </li> </ul> </li> <li>14. Chapter 8 (Administration),               <ul style="list-style-type: none"> <li>• Old clauses 362 to 377B. New clause 1.4.                   <ul style="list-style-type: none"> <li>◦ Only old clause 363 is retained. The rest is deleted including clause 373B (AEMO to determine the small use customer indicator).</li> </ul> </li> </ul> </li> <li>15. Chapter 11 (Retailer of Last Resort),               <ul style="list-style-type: none"> <li>• Old clauses 408 to 418. New clause 7.1 to 7.2.                   <ul style="list-style-type: none"> <li>◦ Largely unchanged.</li> </ul> </li> </ul> </li> <li>16. Appendix 1 (Coding of Zones),               <ul style="list-style-type: none"> <li>• Old sub appendix 1.2.1 to 1.2.2.                   <ul style="list-style-type: none"> <li>◦ Largely unchanged but moved into section 2.3.2 of the ICD.</li> </ul> </li> </ul> </li> <li>17. Appendix 2 (Estimation and Verification Methodology),               <ul style="list-style-type: none"> <li>• Old Sub appendix 2.2 to 2.3. New Appendix A.                   <ul style="list-style-type: none"> <li>◦ Largely unchanged.</li> </ul> </li> </ul> </li> <li>18. Appendix 3 (Calculation of the MIRN checksum),               <ul style="list-style-type: none"> <li>• Old Sub appendix 3.1.                   <ul style="list-style-type: none"> <li>◦ Deleted. Covered in MIRN Structure document.</li> </ul> </li> </ul> </li> <li>19. Appendix 4 (Auditor’s Deed of Undertaking)               <ul style="list-style-type: none"> <li>• Old Sub appendix 4.1.</li> </ul> </li> </ul>



Ref#	Title of document and any notes.	Ver #	Summary of the change
			<ul style="list-style-type: none"> <li>○ Deleted.</li> </ul> <p>20. Appendix 5 (Calculations, Rounding and Units)</p> <ul style="list-style-type: none"> <li>• OLD Sub appendix 5.1. New clause 1.2.2.</li> <li>○ Some changes.</li> </ul> <p>21. Appendix 11 (Heating Degree Day)</p> <ul style="list-style-type: none"> <li>• Old Sub appendix 11.1. New Appendix B.</li> <li>○ Some changes.</li> </ul>
2	SA/WA Interface Control Document (ICD)  Marked up showing differences between current version	5.0	<ol style="list-style-type: none"> <li>1. New section added (2.1.1.) that explains the assignment of GBO ids.</li> <li>2. New section added (2.3) that explains gas zones and gate points.</li> <li>3. Placed the technical validation rules that were in the RMP into section 8 for some transaction.</li> <li>4. Update old RMP clause reference with new RMP clause reference. .</li> </ol>
3	FRC B2B System Interface Definitions  Marked up showing differences between current version	4.6	<ol style="list-style-type: none"> <li>1. Update old RMP clause reference with new RMP clause reference.</li> <li>2. Update Appendix E (Non-Automated Electronic Files) to include the existing Complete MIRN Listing transaction</li> <li>3. Update Appendix F (Unstructured Transactions) to include transaction that existed in the Non-IT RMR Communications document.</li> </ol>
4	Connectivity Testing and Technical Certification  Marked up showing differences between current version	3.7	<ol style="list-style-type: none"> <li>1. Update this document so it is WA only. The Gas FRC B2B Connectivity Testing and System Certification document will govern certification.</li> </ol>
5	Readiness Criteria  Marked up showing differences between current version	2.3	<ol style="list-style-type: none"> <li>1. Update this document so it is WA only.</li> </ol>
6	Gas FRC B2B Connectivity Testing and System Certification	1.9	<ol style="list-style-type: none"> <li>1. Add SA as a jurisdiction to adopt this document</li> </ol>



Ref#	Title of document and any notes.	Ver #	Summary of the change
	Marked up showing differences between current version		
7	NSW/ACT RMP Marked up showing differences between current version	24.0	1. Clause 1.1.2 (d) to (f) (Wagga Wagga and Tamworth). Update old RMP clause reference with new RMP clause reference.
8	Participant Build Pack 6 (NSW/ACT – Wagga Wagga and Tamworth) Marked up showing differences between current version	3.0	1. Minor changes such as old RMP clause reference with new RMP clause reference. 2. Placed the Wagga Wagga Tamworth (WWT) Gas Zone Codes from NSW/ACT RMPs into section 11.6 of the ICD. (Note This may move to Participant Build Pack 6 (covering the Wagga Wagga and enviros, and Tamworth networks) as a separate Appendix
9	SA RMPs. Current version with comments added showing cross reference new clause number in ver 17.0	16.0	Not applicable
10	Clause cross reference mapping between SA RMP ver 16 and 17	Not applicable	Not applicable

## ATTACHMENT D – SUBMISSIONS RECEIVED FOR CHANGE IN006/17 - PPC CONSOLIDATED FEEDBACK.

### Section 1 - General Comments on the Proposed Procedure Change

Topic	Company	Response
Sections 1 to 9 of the PPC sets out details of the proposal.	Origin	Origin have reviewed PPCIN006/17 and accept the proposed changes.
Does your organisation supports AEMO's assessment of the proposal?	AGL	No response provided in the general section of the proposal.
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 rational why you do not support AEMO's assessment.		

Section 2 - Feedback on the documentation changes described in Attachment C of the PPC

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause#	Issue/ Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
1	AEMO	General	Fix up the following crossref errors: Clause 1.2.1 – actual heating degree day–8.6.15(a) - average temperature–App C.2 (a) - forecast EDD–App C.4 (a) - forecast heating degree day or HDDF–App C.4 (b) - forecast interval-metered withdrawals or UFIW–8.4.3 - non-temperature-sensitive base load–8.4.2 - proxy ground temperature or Tgnd–App C.2. (c) - temperature sensitivity heating rate–8.4.2 - total sun hours–App C.2 (b) Clause 3.1.2(c) (ii)–4.1 (e) Clause 3.9 (c)–b Clause 3.9 (d)–d Clause 8.2.4(a)–8.4.3 (c) Clause 8.4.2–“this clause” Clause 8.4.4(a) (i)–8.4.2 Clause 8.4.4(a) (i)–8.4.2 Clause 8.6.6(a)–8.4.2 Clause 8.6.6(a)–8.4.2		<b>AEMO will update the Retail Market Procedures (RMP)</b> to correct the cross-reference errors.

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
1A	AEMO		<p>Various miscellaneous typo and grammar type changes which include:</p> <ul style="list-style-type: none"> <li>• Definition of Self Contracting User – typo</li> <li>• 5.2.3(b) – Grammar</li> <li>• 8.1.6(d) and 8.7(a) – typo</li> <li>• 9.1.12(c) – typo.</li> </ul> <p>Note - These changes are not cross referenced as a comment within the RMP but are marked up.</p>		<b>AEMO will update the Retail Market Procedures (RMP)</b> to correct Various miscellaneous typo and grammar type changes.
2	AEMO	1.2.1	Definitions - affected gas day. This definition has been deleted from the main body of the procedures.		See ref #29
3	AEMO	1.2.1	Definitions - bulk AEMO standing data. This definition has deleted from the main body of the procedures therefore can be deleted.	Delete definition as it is not used.	<b>AEMO will update the Retail Market Procedures (RMP)</b>
4	AEMO	1.2.1	Definitions - bulk AEMO standing data request. This definition has deleted from the main body of the procedures therefore can be deleted.	Delete definition as it is not used.	<b>AEMO will update the Retail Market Procedures (RMP)</b>

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
5	AGL	Definition and usage General	Use of 'under clause' or 'in clause' AEMO has made some changes to clauses (eg Historical Gas day) replacing 'under clause..' with 'in clause', but has not changed other references (eg average temperature). Suggest that there needs to be come consistency in usage and whichever option is considered best drafting practice be used throughout the procedures		Partly accept. Changed 'under' to 'in' in 3 definitions that refer to a specified clause for the definition for consistency. Also changed instances of 'has the meaning given to it/that term', etc. to 'has the meaning given' for consistency. In most other instances a reference to something done 'under' a clause typically means something different to something specified or defined 'in' a clause, so it is appropriate to retain different words. <b>AEMO will amend the RMPs</b> noting the above feedback.
6	AGL	Definition Bulk AEMO Standing Data / Request	Check automated cross reference		See ref #3 and 4
7	AGL	Definition EDD	Suggest minimise the definition and remove the various day notations, similar to forecast EDD	The effective degree day value E calculated for a given day being, as applicable under clause 8.1.6(a)(i)	AEMO supports AGL suggestion as noted in the feedback. <b>AEMO will therefore amend RMP.</b>

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
8	AGL	Definition Customer Own Read	AGL notes that this definition would disallow a read provided by a Self-Contracting User (which would include an exempt seller to exempt customers), as they would not meet the definition of customer in section 5 of the NERL. AGL suggests an amendment to the drafting.	A read of a meter undertaken by a Customer <u>or User</u> , details of which are provided <del>by the Customer</del> to the User or Network Operator for the delivery point to which the meter relates.	AEMO does not support AGLs proposal. Self-Contracting Users (SCU) are typically large users therefore these sites are interval metered sites. Interval Meters are telemetry read by the Network Operator so the concepts of providing a COR isn't required. In any event, exempt sellers can only be SCUs if selling to related bodies Corporate, in which case their customers are still not Users. However, AEMO has identified that the definition of a Customer could be improved for all east coast jurisdiction to include exempt customers for other purposes under the procedures in the event an exempt seller is registered either as a Retailer or an SCU. AEMO has added this as a new item on the register (IN006/20).



\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)									
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)				
9	AGL	Definition Estimated Meter Reading	<p>Further, in considering the issue of Customer Own Reads (CoRs) Participant Build Pack 1 clearly distinguishes between the various mechanisms which provided a meter read and the NRR does specify that a Customer Own Read is an estimate.</p> <table border="1" data-bbox="577 619 1108 718"> <tr> <td>Adjustment_Reason_Code</td> <td>String</td> <td>2</td> <td>                     "UR" = Under Read                      "OR" = Over Read                      "UE" = Under Estimated                      "OE" = Over Estimated                      "NC" = No Change                 </td> </tr> </table> <p>However, it is unclear where the hierarchy for gas meter reads defines CoRs as estimates and whether they are greater or lower than calculated estimates</p>	Adjustment_Reason_Code	String	2	"UR" = Under Read "OR" = Over Read "UE" = Under Estimated "OE" = Over Estimated "NC" = No Change	<p>AGL suggests that this be flagged as an item for review across all the various procedures, as they will all now incorporate CoRs and the growth in CoRs means that clarity around how they are handled will become more important to retailers and networks.</p>	<p>AEMO supports the idea to review the AdjustmentReasonCode codes. There is an existing GMI (IN008/19) that proposed changes to the Customer Own Read (COR) process, so AEMO will add the AdjustmentReasonCode issue to that scope of works.</p>
Adjustment_Reason_Code	String	2	"UR" = Under Read "OR" = Over Read "UE" = Under Estimated "OE" = Over Estimated "NC" = No Change						
10	AGL	Definition HDD Zone	<p>Suggest that the definition needs development, as the current definition deals with the HDD value not the HDD zone.</p>	<p><u>Heating Degree Day (HDD) Zone is a designated area where all MIRNs within that area are assigned the same Heating Degree Day value.</u></p> <p><del>1. A positive HDD zone or a negative HDD zone.</del></p>	<p>AEMO supports the suggestion, but has proposed modified drafting. <b>AEMO will amend RMP.</b></p>				

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
11	AGL	1.3.3	Amendment to enumerations. AGL notes that this clause is incorrect and urges AEMO to commence a tidy up of the outstanding procedures to rectify this error.		AEMO added a new issue on the Retail Market Issue/Change register (IN005-20) to address the indifference between east and west coast markets as part of the SARMP 4 <sup>th</sup> draft feedback.  AEMO received a GMI on 31 <sup>st</sup> October 2019 from AGL on this matter. This GMI will be circulated to the GRCF as part of the November GRCF meeting pack to determine whether it should be included in the GRCF 2020 program of work.
12	AGL	3.1.2	Check automated cross reference		See Ref #1.

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
13	AGL	3.1.4	<p>Customer Own Reads (CoR)</p> <p>There are customers delivering CoRs daily and, in general, the receiving party only needs one CoR a month, not daily CoRs. The suggested amendment would allow this reduction in CoR data delivery to be agreed by the relevant parties whilst still retaining the current obligation as a minimum position.</p> <p>AGL suggest an amendment to the all the procedures for CoR meter data provisions be commenced to remove an unnecessary/ potential non-compliance of an obligation imposed on either the network or the retailer – refer to AGL GMI.</p>	<p>2. <b>3.1.4. Customer-own reads</b></p> <p>3. If, following the failure by a Network Operator to read a meter, the Customer of a Retailer provides a Customer-own read:</p> <p>(a) to its Retailer, the Retailer must use its reasonable endeavours to provide the Customer-own read to the Network Operator by 5.00 pm on the next business day after the day on which it was received from the Customer <u>or at a time and frequency agreed by the parties.</u></p> <p>(b) to the Network Operator, the Network Operator must process the Customer-own read in accordance with clauses 3.4 to 3.7 <u>or at a time and frequency agreed by the parties.</u></p>	<p>AEMO notes AGLs point that there is an existing GMI (IN008/19) to review the wording of Customer Own Reads. The scope of this GMI includes SA.</p> <p>AGL provided the same proposed drafting in the 4<sup>th</sup> round SA RMP feedback. The response that AEMO provided in the 4<sup>th</sup> round feedback remains unchanged in that AGLs suggested changes can be considered under GMI IN008/19.</p> <p>It should be noted that the priorities for 2020 have been agreed with the GRCF back in Sept 2019. The GRCF decided not to include IN008/19 in the 2020 program of work, therefore this initiative will don't be reviewed till 2021. If AGL or any other participants feels IN008/19 is a priority, they are welcome to raise the matter with the GRCF and put forward reasons why it needs to be a priority in 2020.</p>
14	AEMO	3.3.2 (c) note	There was a clause crossref # in the note that was linking back to clause 301A (Manifest data errors and recalculation of gas day results) in the old RMPs which was deleted in the 5 <sup>th</sup> draft. The cross ref should therefore be deleted.	4.	<b>AEMO will amend RMP.</b>

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
15	AGL	3.9	Check automated cross reference		See ref #1
16	AGL	4.2	AGL supports the changes		AEMO notes AGLs support for this change.
18	AGL	4.4.2	Check automated cross reference		AEMO supports AGL suggestion to correct the cross reference error. <b>AEMO will therefore amend RMP.</b>
19	AGL	4.2.7(iii)	Typo ... as pending by AEMO under clause 6.6f or a		AEMO supports AGL suggestion as noted in the feedback. <b>AEMO will therefore amend RMP.</b>
20	AGL	4.3	Meter Upgrades AGL notes that this clause does not contemplate the network requiring the meter to be upgraded. Further, the items requiring consideration (i) and (ii) do not require assessment of gas pipeline capacity or other system upgrades which required for an upgrade to support the MDQ/MHQ needed.	Suggest new clause (iii)  (i) access to the <i>meter</i> being sufficient to install the <i>interval meter</i> (the <i>Network Operator</i> must inform the <i>User</i> of any access difficulties); <del>and</del>  (ii) other site constraints, including confined spaces, being resolved; <u>and</u>  (iii) <u>any network requirements to support he increased load.</u>	AEMO does not support the proposal. Requirements for interval meters to be installed for delivery points based on expected consumption are in the SA Gas Metering Code, which the RMPs do not need to repeat.  Clause 4.3(a) is only relevant where a user has requested an upgrade. The 4.3(b) obligations apply whenever a network operator installs an interval meter, whether at the user's request or under a legal requirement.

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
21	AGL	4.3	Meter Upgrades AGL notes there is no procedural requirement to deal with meter downgrades and suggest that this be tagged for a general review across the retail procedures.		There is already an existing initiative (IN004/17) recorded on the Issues/Change register to add a downgrade process to the VIC and QLD procedures. AEMO will add SA to the scope of works. This initiative is part of the 2020 GRCF program of work.
22	AGL	4.4.2	Check automated cross reference		See Ref #18
23	AGL	4.4.3	AGL supports the change		AEMO notes AGLs support for this change.
23A	AEMO	6.1.4	Add further clarity for a transfer request when it relates to a Self Contracting User (SCU).		<b>AEMO will amend RMP.</b>
24	AGL	6.5	Heading AGL queries which components of the heading are now made lower case – eg ‘Move In’ which is the transfer action to ‘Move in’ and ‘Pending’ which is a recognised transfer state, to ‘pending’,. AGL would suggest the changes be removed.		Per standard interpretation rules, headings have no interpretative value. In these procedures, the convention is for heading 2 in title case, with heading 3 in sentence case. AEMO has changed the headings for 6.5 and 6.6 to better reflect the content – Move Ins Pending and Other Transfers Pending <b>AEMO will amend RMP</b> as noted above.
25	AGL	8.1.6(b)	AGL supports this amendment which was previously raised by AGL within IN 004-18.		AEMO notes AGLs support for this change.

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
26	AGL	8.3	AGL supports the changes		AEMO notes AGLs support for this change.
27	AGL	8.4	AGL supports the changes		AEMO notes AGLs support for this change.
28	AGL	8.6	AGL supports the changes		AEMO notes AGLs support for this change.

29	AGL	8.8.1 (old 8.6.2)	<p>AGL does not support the notes the removal of cl 8.1.6(d)(ii) (Cl 177(4) of the existing procedures) at this time.</p> <p>AGL has not had time to review whether this change impacts the STTM operation as well as the contract carriage environment in SA.</p> <p>AGL believes that the impact of this change needs to be assessed carefully both from a retail perspective and a wholesale perspective.</p> <p>At the very least, AGL would expect AEMO to notify the market in the case of manifest data errors for gate point data, as well as working with industry to rectify the issues.</p>		<p>AEMO notes AGLs non support to delete clause 8.1.6(d)(ii) (Calculation of heating degree day) and 8.8.2 (Manifest data errors and recalculation of gas day results)</p> <p>In relation to 8.1.6(d)(ii) (Calculation of heating degree day), AEMO does not support AGLs position not to support the deletion of this provision. This provision currently has a cross reference to clause 216(1) which once contained the provisions to the intra reports. Those reports are no longer generated. They were deleted as part of a the IN011/17 change that was implemented back in June 2018. The clause 8.1.6(d)(ii) therefor is superfluous and should have been removed as part of IN017/11. AEMO is therefore deleting this provision.</p> <p>In relation to AGL comments regarding manifest data errors and recalculation of gas day results (old clause – 301A), AEMO did provide an explanation for deleting clause 301A in an e-mail sent SA GRCF representative on the 14th Oct. This explanation was contained in the Consolidated feedback on 4th draft of IN006/17 document. It is item 24H.</p> <p>The following is further context to AEMO reasoning why this clause can be deleted. The origins of clause 301A date back in 2005 when South Australia market operated swing</p>
----	-----	-------------------	--	--	--

					<p>service balancing arrangement. Swing service is a forward reconciliation arrangement. Having read the original procedure change proposal that change provided for the network operator to notify REMCo (then market operator) if any manifest errors are suspected in interval metering data and/or pipeline data. REMCo would then be able to suspend processing the balancing, allocation and reconciliation calculations under Chapter 5 (Balancing and Reconciliation (BAR) calculations) and recalculate any results should revised input data be received. 2010 saw the emergence of a Short Term Trading Market (STTM) in SA. The STTM changes involved significant system changes to be made to the GRMS in SA, including the move from forward to backward reconciliation and the removal of all swing service operations. The change for the GRMS involved:</p> <ul style="list-style-type: none"> <li>• A change from forward to backward reconciliation for all subnetworks in the South Australian Gas Retail Market;</li> <li>• The provision of 'user allocation' data to users and STTM systems, on timeframes aligned to the STTM; and</li> <li>• The disabling of swing service calculations for all GRMS subnetworks.</li> </ul> <p>Given the nature of the above changes, the provision set out in</p>
--	--	--	--	--	---



\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
					<p>clause 301A have become redundant. In hindsight AEMO should have proposed the removal this clause as part of the STTM changes. Given that the SA market (STTM and non STTM) is now a backward reconciliation market, it essentially means that any suspected error in interval metering data and/or pipeline data will be corrected when the following day's data is received. For the STTM subnetwork, so long as the corrected data is provided by 9am AEST, then the correction will be processed, and the revised results provided in the Allocations Weekly Update report at 2pm AEST. For non STTM subnetworks, so long as the corrected data is provided within 425 days then the correction will be processed. Given the above, AEMO maintains that the clause is redundant.</p> <p>Note- The definition of "affected gas day" was only used in clause 301A, therefore <b>AEMO will amend the RMP.</b> See also ref #2.</p>

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #1 – SA Retail Market Procedures (RMP)					
Ref	Company	RMP Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
30	AGL	9.1.2(b)	AGL is unclear why CI 9.1.2(b) has been deleted for an error correction of standing data. CI 9.1.2 is titled 'Rejection of Error Correction Notice' but with the deletion the clause only contains the requirements for an ECN to be valid There is no action arising from an invalid ECN for errors in AEMO Standing Data.	Suggest that the Clause be retitled and a new sub clause be added which specifies AEMO's response to an invalid ECN.	AEMO supports this suggestion. <b>AEMO will therefore amend RMP.</b>
31	AGL	Appendix C	AGL supports the change		AEMO notes AGLs support for this change.

***Participants are to complete the relevant columns below in order to record their response.***					
Ref #2 - SAWA Interface Control Document (ICD)					
Ref	Company	SAWA ICD Section #	Issue / Comment	Proposed text <del>Red strikethrough</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
32	AGL	2.1.1			
33	AGL	2.1.1.2.1	Clarity The clause specifies a sub-section- 'under <b>the</b> sub-section'. The drafting is not clear which sub-section the obligation is linked to. The reference needs to be clear about the obligation.		AEMO agrees with AGLs suggestion to improve the clarity. The words "under the sub section is not require and <b>will therefore amended the ICD.</b>
34	AGL	2.1.1.2.2	Grammar A 'person' is not an 'it'	determine and issue a GBO identification for the person for each capacity in which <del>it</del> <u>they</u> operates under the Procedures; and	AEMO agrees with AGLs suggested grammar change and <b>will amended the ICD.</b>
35	AGL	2.1.1.3	Grammar A 'person' is not an 'it'	... for each capacity in which <del>it</del> <u>they</u> operates under these Procedures	AEMO agrees with AGLs suggested grammar change and <b>will amended the ICD.</b>
36	AGL	2.1.1.3	Grammar Incorrect use of colon, missing comma	... including, for example, <del>a</del> <u>a</u> shipper that has contracts for the transportation	AEMO agrees with AGLs suggested grammar change and <b>will amended the ICD.</b>
37	AGL	2.1.1.4	Grammar Unnecessary 'and' at end of dot point 3, as there are dot point 4 and 5.	... "suspended" or "deregistered"; <del>and</del>	AEMO agrees with AGLs suggested grammar change and <b>will amended the ICD.</b>

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #2 - SAWA Interface Control Document (ICD)					
Ref	Company	SAWAICD Section #	Issue / Comment	Proposed text <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
38	AGL	2.1.1.6	<p>It is unclear how AEMO would necessarily be aware of whether a party has entered into an agreement which allows their GBOID to be suspended, unless they advised AEMO.</p> <p>Suggest that the clause could be rewritten to allow participants to advise AEMO of such as occurrence.</p>		<p>AEMO agrees with AGLs point that the paragraph is a little unclear. AEMOs preliminary assessment has confirmed that there is no participant that has a GBO-ID marked as "suspended". There is also no recent record that AEMO has placed a participant GBO-ID into a "suspended" state. The assessment has also highlighted the uncertainty around the circumstances / concept of a participant GBO-ID becoming "suspended". There is a GBO-ID status of "deregistered" which has been used previously in WA. There are none for SA. There is a possibility that the GBO-ID status of suspended isn't required. There is likely to be a system impact to remove this GBO-ID state, but this would need to be investigated. Given the above, AEMO has added this issue to the Retail Market Issues / Change Register (IN008-20)</p>

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #2 - SAWA Interface Control Document (ICD)					
Ref	Company	SAWA ICD Section #	Issue / Comment	Proposed text <del>Red strikethrough</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
39	AGL	2.1.1.9	This clause references cl 2.1.1.7.1, but AGL believes that it should reference Cl 2.1.1.6 which is the clause with the action, as Cl 2.1.1.7 .1 describes a consequence of cl 2.1.1.6.	2.1.1.9 If a person was “suspended” under sub section <u>2.1.1.6</u> <del>2.1.1.7.1</del> , then	AEMO agrees with AGLs suggestions that the clause reference is incorrect and <b>will amended the ICD.</b>
40	AGL	2.1.1.10.2	AGL notes the two sub clauses, and would consider that the order of the sub-clause should be reversed.  That’s is, the person ceases to act in a capacity and then AEMO is advised that they are no longer required to comply with the procedures.  AGL would expect a party ceasing to act in a capacity, is likely to still have obligations until the end of the reconciliation windows and would therefore not be deregistered until after that period.		AEMO agrees with AGLs suggestions to reverse the sub clause so AEMO <b>will amended the ICD.</b>
41	AGL	2.1.1.10	AGL is unclear why the third criteria in the existing SA Procedures (below) has not been carried across to the SAWA ICD:  Cl 22(10)(d) person exiting the market under 377B		The reason why that third criteria was not add was because there is no clause 377B in the body of the RMPs. Clause 377B related to swing service so it was deleted when the STMM was implemented in SA. It appears that the “deletion” was overlooked.

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #3 - FRC B2B System Interface Definitions					
Ref	Company	FRC B2B Section #	Issue / Comment	Proposed text <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
42	AGL	T299 – SA	AGL suggests that for consistency that the obligation to provide data fields is made consistent with the WA drafting.	<u>... The Network Operator must ensure that all data fields per Transaction 299 that are available in their database are transferred to the Complete MORN listing irrespective of whether the data field is designated as O (optional) in the table for T299..</u>	AEMO will added new issue on the Retail Market Issue/Change register (IN007-20) to address the indifference between east and west coast markets.

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #4 - Connectivity Testing and Technical Certification					
Ref	Company	Testing Section #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
43	AGL		AGL supports the changes		AEMO notes AGL's support for the changes to the Connectivity Testing and Technical Certification contained within the PPC.

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #5 - Readiness Criteria					
Ref #	Company	Readiness Section #	Issue / Comment	Proposed text <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
44	AGL		AGL supports the changes		AEMO notes AGL's support for the changes to the Readiness Criteria document contained within the PPC.



\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #6 - Gas FRC B2B Connectivity Testing and System Certification					
Ref#	Company	FRC Connectivity Section #	Issue / Comment	Proposed text <del>Red-strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
45	AGL		AGL supports the changes		AEMO notes AGL's support for the changes to the Gas FRC B2B Connectivity Testing and System Certification document contained within the PPC.

***Participants are to complete the relevant columns below in order to record their response.***					
Ref# 7 - NSW/ACT RMP					
Ref #	Company	NSWACT RMP clause #	Issue / Comment	Proposed text <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
46	AGL		AGL supports the changes		AEMO notes AGL's support for the changes to the NSW/ACT procedures contained within the PPC is noted.

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Ref #8 - Participant Build Pack 6 (NSW/ACT – Wagga Wagga and Tamworth)					
Ref#	Company	PBP 6 Section #	Issue/Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
47	AGL		AGL supports the changes		AEMO notes AGL’s support for the changes to the Participant Build Pack 6 (NSW/ACT – Wagga Wagga and Tamworth) document contained within the PPC.

## **ATTACHMENT E – DOCUMENTATION CHANGES (SEE SECTION 3)**

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

The draft versions of the Retail Market Procedures are attached separately to this document. Note – the track changes only show the changes post the PCC version and not the full changes from version 16.

Draft version of the technical protocols showing tracked changes between the current version and the proposed changes is attached separately to this document.