



# Proposed Procedure Change (PPC)

<b>Ref# (if applicable)</b>	2023 Package 6 – WA minor changes (IN009/20W, IN002/22W, IN002/23W and IN001/24W)		
<b>Impacted jurisdiction(s)</b>	Western Australia (WA)		
<b>Proponent</b>	AEMO	<b>Company</b>	AEMO
<b>Proponent email</b>	<a href="mailto:grcf@aemo.com.au">grcf@aemo.com.au</a>		
<b>Affected Gas Market(s)</b>	WA Retail		
<b>Date proposal published by AEMO</b>	11 April 2024	<b>Date proposal sent to AEMO</b>	2 January 2024
<b>Short issue title</b>	Minor non-controversial changes to the WA Retail Market Procedure (RMP) and Technical Protocol (TP) to provide further clarity to various clauses, address potential gaps and update details so that they reflect current situation.		
<b>Procedure(s) or Documentation impacted</b>	Please refer to section 2.		
<b>Other key contact information</b>			
Version #	Presented to	Date	
1.0	GRCF	11 April 2024	

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Australian Energy Market Operator Ltd ABN 94 072 010 327

## Proposed Procedure Change (PPC) – Detailed Report Section

### Critical Examination of Proposal

#### 1. Description of issue

This Proposed Procedure Change (PPC) proposes amendments to the documentation<sup>1</sup> that are minor in nature. Section 3 of this PPC contains further information about each of the issues and a brief explanation of the specific changes. Attachment A of this PPC contains amendments for each of the proposed changes. If approved these changes will provide further clarity to some of the clauses, address potential gaps and update details so that they reflect current business process in the WA retail gas market.

##### 1.1. Pre-consultation outcomes

At the Gas Retail Consultative Forum (GRCF) prioritisation session held in November 2022, participants supported AEMO's proposal of bundling of like for like initiatives for 2023. Package 6 is centred around providing further clarity to some of the RMP clauses and updates to reflect current business process in relation to WA. Further analysis of initiatives on the register identified another initiative that require fixing of minor errors in the TP documents.

On the 12 March 2024, a Gas Market Issue (GMI) that provided details about four separate initiatives including drafting changes to the RMP WA and TP was submitted to the GRCF participants.

Submissions on this GMI closed on the 26 March 2024. AGL, Alinta, ATCO, Kleenheat, Origin and Synergy submitted feedback to the GMI. Participant feedback and AEMO's response to the feedback has been included in Attachment C.

Alinta's submission proposed couple of minor amendments to the RMP WA. AEMO agrees with the proposed amendments as they add further clarity.

Regarding the initiative IN002/23W, Synergy's submission noted that system changes may be required related to the proposed TP changes AEMO discussed the issue with Synergy and clarified what the field type 'R'equired obligations are and confirmed that no system change is required for changing it from 'O'ptional to 'R'equired. It is a business process requirement that if the participant's data is not blank or null then it should be provided in the transaction. There is no system validation to check whether a participant has the data available in their system, unlike for a field type 'M'andatory where the data must exist in the transaction else it will be rejected. Synergy agreed with AEMO and has confirmed that by email. This confirmation has been included in AEMO's response to Synergy's submission.

Regarding the initiative **IN002/21W (Anticipated annual consumption for basic meters)** which was originally included in Package 6 that involved reviewing and potentially updating the default

<sup>1</sup> See section 2 for details on which document are impacted by these changes.

average daily consumption values for certain meter types, AEMO made a preliminary determination that this initiative does not need to be part of the Package 6 formal consultation program of work. This is due to these default values not needing to follow the procedure change process under Chapter 9 of the RMP WA. Feedback received from participants supported AEMO's assessment, therefore AEMO has removed this initiative from the Package 6 consultation.

## 1.2. How to make a submission

Anyone wishing to make a submission to first stage consultation are requested to use the response template provided in Attachment B. Submissions close **COB 26 April 2024** and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

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

## 2. Reference documentation

- Retail Market Procedures (WA) Ver 8.0
- B2B Service Order Specifications (WA Only) – Part 1 Ver 2.5
- FRC B2B System Interface Definitions Ver 5.1
- Specification Pack Usage Guide Ver 8.7

## 3. Overview of changes

The following proposals and the document/s impacted are summarised in the table below, and detailed in the following sections:

ID	Title	Participant System Impact	Documentation Impact
IN009/20W	Typographical error in 'Auditor's deed of undertaking'	No	Retail Market Procedures (WA)
IN002/22W	Issue with WA participant deregistration	No	Retail Market Procedures (WA)
IN001/24W	Fix clause numbering in Appendix 2 of RMP WA	No	Retail Market Procedures (WA)
IN002/23W	Fix minor documentation errors in WA Technical Protocol	No	FRC B2B System Interface Definitions B2B Service Order Specifications (WA Only) – Part 1

### 3.1. IN009/20W - Typographical error in 'Auditor's deed of undertaking'

AEMO is the proponent of this change. Clause 9 in Appendix 4 of the RMP WA relates to the Covenantor having to provide a Report to the Covenantee. It refers to clause 359 of the RMP WA

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for the Report required. Clause 359 refers to the 'Level of Audit' whereas the Report required is referred in clause 358.

Also, clause 9 in Appendix 4 specifies a period of 2 months within which the report should be provided to AEMO. The business practice has always required the WA participants to provide the report within 3 months after the end of the year.

The PPC proposes amending:

- clause 9 in Appendix 4 to refer to clause 358 instead of 359; and
- the period to 3 months instead of current 2 months.

Please refer to Attachment A for the proposed changes.

### 3.2. IN002/22W - Issue with WA participant deregistration

AEMO is the proponent of this change. During the APTFM deregistration, AEMO identified a potential gap in the requirement of clause 377B(2)(b)(i) of the RMP WA. The purpose of this clause is to cover the reconciliation period and should include the allocation of User's Reconciliation Adjustment Amount (URAA) or Swing Service Repayment Quantity (SRQ). The clause covers the reconciliation period but not the allocation of URAA (as per clause 245 of WA RMP) or SRQ (as per clause 298 of WA RMP).

The PPC proposes making a minor change to clause 377B(2)(b)(i). The change involves adding 3 days to calculate and pay the URAA and SRQ. This would allow for URAA allocated for any reconciliation amount generated in the 425 day reconciliation period since the user ceased to be active (i.e. be a FRO) and any SRQ repayment. Please refer to Attachment A for the proposed change

### 3.3. IN001/24W - Fix clause numbering in Appendix 2 of RMP WA

The proponent for this change is AEMO. While determining the changes for a separate initiative IN002/21W (Anticipated annual consumption for basic meters), AEMO identified minor issues with clause 16 and Appendix 2 of RMP WA. The minor issues were as follows:

- Incorrect title for clause 16.
- Clause numbering missing in Appendix 2.

The version of the RMP WA that AEMO inherited from the previous market operator REMCo had these minor issues which were not identified when the transition occurred.

AEMO has proposed the changes required to clause 16 and reintroduction of numbering in Appendix 2 of RMP WA to rectify the issues identified above. Please refer to Attachment A for the proposed changes. The original title of clause 16 was '**Rule change procedure does not apply to amending and updating appendices.**' AEMO is proposing to change this title to '**Chapter 9 (Procedure change process) does not apply to amending and updating Appendices**' which reflects the current terminology in use.

### 3.4. IN002/23W – Fix minor documentation errors in WA Technical Protocol

AEMO is the proponent of this change. This change corrects a minor discrepancy between TP documents:

- B2B Service Order Specifications (WA Only) – Part 1; and
- FRC B2B System Interface Definitions that was first raised with AEMO in mid-2023.

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It related to LoadDetails/PerAnnum field in the Service Order Request (SOR) information Retailers send to the Distributor ATCO.

This minor discrepancy exists in the TP documents that AEMO inherited from previous market operator REMCo. ATCO provided the following corrections to the discrepancies.

- The LoadDetails/PerAnnum field is 'Required' in FRC B2B System Interface Definitions and 'Optional' in B2B Service Order Specifications for new connection service orders with codes 'SCR/CLT/ECO' and for meter/pressure upgrades with code 'UMS'. The Distributor ATCO has confirmed that they need to be 'Required' in both documents.
- Replace one of the duplicate occurrences of the code 'CLT' with 'SCR' and the invalid code 'SCF' with 'TCR' in the FRC B2B System Interface Definitions.

The PPC proposes amending the LoadDetails/PerAnnum field in the 2 TP documents to remove the discrepancies noted above. Please refer to Attachment A for the proposed changes.

## 4. Likely implementation requirements and effects

AEMO has determined that the proposed changes in this PPC are mainly documentation changes and may require very minor process changes.

### **IN009/20W**

No impact on any participant. The changes will give more clarity and align the procedure with on-going business practice of providing the audit report to AEMO within 3 months instead of 2 months.

### **IN002/22W**

No impact on any participant. For AEMO there is a minor process change which will ensure the last allocation of URAA and SRQ is covered before the deregistered participant exits the market.

### **IN001/24W**

No impact on any participant. This change will fix the documentation errors and provide clarity to procedure change requests processed by AEMO.

### **IN002/23W**

Minor process changes for participants so that correct service order request code is used in service orders.

## 5. Impact of issue not proceeding

Not making the amendments is likely to cause the following issues with smooth operation of WA retail gas market for AEMO and the WA participants,

- Inconsistency between procedure and business practice of when an audit report must be provided by a participant.
- A participant may exit the market before their URAA or SRQ has not been fully allocated.
- A service order could potentially be raised with incorrect service order request codes resulting in delay in addressing the service request.

- Lack of clarity for AEMO in procedure change consultation involving changes to the appendices in the RMP WA.

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

Inclusion of the proposed Technical Protocol and Procedure changes will eliminate any consideration of an administrative non-compliance and allow participants and AEMO to operate in an effective and efficient manner.

The benefits are likely to be realised as follows:

- Enable consistency between business practice and procedure about when an audit report must be provided by a participant.
- Ensure a deregistered participant exits the market after all URAA and SRQ has been allocated.
- Ensure service orders are raised with correct service order request code.
- Fix typographical errors and give more clarity to future procedure change consultations involving changes to the appendices in the RMP WA.

AEMO expects there will be negligible implementation costs since none of the changes proposed in this PPC require substantial process changes and considers the magnitude of this change to be **non-material**. If a participant believes that any of the proposed changes are material, this feedback needs to be included in the Attachment B response template.

## 7. AEMO's preliminary assessment of the proposal's compliance with clause 378 of the RMP

Regarding the changes in WA, AEMO's preliminary assessment of the proposal's compliance with clause 378 of the RMP (WA) is:

Requirement	AEMO's Preliminary Assessment
Ensure that the retail gas market operates and is governed in a manner that is: (i) open and competitive; (ii) efficient; and fair to participants and their customers	AEMO's view is that the proposed change will continue to promote competition, properly reflects operational practices and will not disadvantage participants or their customers.
Ensure compliance with all applicable laws	AEMO's view is that the proposed changes are consistent with the applicable laws, and participants will be given an opportunity during this PPC consultation to inform AEMO if they believe the proposed change is in conflict with any applicable laws.

Requirement	AEMO's Preliminary Assessment
Ensure effective consultation occurs and gives stakeholder's opportunities to provide feedback of the proposed changes	AEMO's view is that this PPC consultation and the subsequent IIR consultation, in addition to the discussions at the GRCF, will provide adequate opportunities for participants to provide feedback on the proposed changes.

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

## 8. Supporting Documentation

Attachment A Proposed Changes to Procedure and Technical Protocol.

Attachment B PPC Response Template.

## 9. Proposed timelines

Subject to all necessary approvals including an approval by ERA, AEMO is targeting to implement this change by mid September 2024.

In order to achieve this timeline, AEMO proposes the following key milestones:

- PPC issued 11 April 2024
- PPC feedback closes 26 April 2024
- IIR issued 6 May 2024
- IIR feedback closes 3 June 2024
- ERA submission issued end June 2024
- ERA decision expected end August 2024
- Proposed effective date of Procedures to be mid September 2024 subject to approval by ERA

## Attachment A – Marked up Changes (See Section 3)

Blue underline represents additions ~~Red~~ and ~~strikeout~~ represents deletions – Marked up changes.  
**Green** shaded refers to changes following GMI consultation.

### Retail Market Procedures (WA) proposed amendments.

Commented [ND1]: For IN001/24W

16. ~~Identification of sub-networks, gas zones and gate points~~ Chapter 9 (Procedure change process) does not apply to amending and updating Appendices

(1) → An amendment to:

(a) → Appendix 1; and

{Note: The process for amending Appendix 1 is set out in clause 15.}

(b) → Appendix 2 (excluding sub-appendix 2.3, ~~“Estimation of Data for Basic Meters”~~); and

(c) → Appendix 7; and

(d) → Appendix 8; and

is not a procedure change **under and** Chapter 9 does not apply to the amendment.

(2) → For the avoidance of doubt, sub-appendix 2.3, ~~“Estimation of Data for Basic Meters”~~, is subject to Chapter 9.



## Part 8.6 – Exiting the market

### 377B. Exiting the market

(1) → In this clause 377B:

(a) → “**active in the market**”:

(i) → for a *user* for a *sub-network* — means that a *user* is the *current user* for one or more *delivery points* in the *sub-network*; and

(ii) → for a *shipper* — means that the *shipper* is listed in the *shipper register*; and

(iii) → for a *swing service provider* — means that the *swing service provider* is a party to a *SSPUD*.

(b) → “**exit the market**” means cease compliance with these *procedures*.

(2) → A *user* may not exit the market in respect of a *sub-network*:

(a) → while it is *active in the market* in the *sub-network*; and

(b) → until the earlier of:

(i) → the day that is 425 + X + 3 days after the *user* ceases to be *active in the market* in the *sub-network*, where “X” has the value given to it in clause 243(4); and

[Note: the time periods in clause 377B\(2\)\(b\)\(i\) are to allow time for all URAA and SRQ to be allocated and repaid.](#)

(ii) → the day that the *user* demonstrates to AEMO’s satisfaction that the *user* has an agreement with another person to fulfil the *user*’s obligations under Chapter 5 in respect of any future URAA or SRQ calculated for the *user* for the *sub-network*.

Commented [ND2]: For IN002/22W

The following extracts are examples of reintroduction of numbering in Appendix 2

Commented [ND3]: For IN001/24W

## Appendix 2 – Estimation and Verification Methodology

### Sub-appendix 2.1 – ATCO Gas Australia's Estimation and Verification Methodology for Basic and Interval Meters

#### 2.1.1.1 → Verification methodology for Basic Meters

There are two steps in the ATCO Gas Australia basic meter validation; Validation of the meter reader's data input and a trend check against historical consumption:

##### 2.1.1.1.1 → Validation of the meter readers data input

The Meter-readers Handheld Unit (MHU) is loaded with upper and lower limits for the index reading. These limits are calculated from the previous index reading and the estimated consumption for the time period since that last meter reading. The estimated consumption is determined using the same algorithms as those used for estimating consumption in case a meter reading cannot be obtained.

The Hi-/Lo-limits allow for gas usage since the last reading ranging from 50% to 175% of estimated usage. If readings exceed this range the meter reader is required to acknowledge the error alert and re-enter the meter index reading. Only if both readings are the same is the meter reader able to store the reading.

##### 2.1.1.2 → Trend check Against Historical data

#### 2.1.2 → Verification methodology for Interval Meters

ATCO Gas Australia uses three types of verification checks:

#### 2.1.3 → Estimation of Data for Basic Meters

##### 2.1.3.1 → Type 1 Estimation Methodology ("Same Time Last Year")

ATCO Gas Australia uses this estimation methodology where the distribution supply point in respect of which the estimated value is to be calculated has at least 12 months consumption history. Where consumption is to be estimated the process is as follows:

#### 2.1.4 → Estimation of Data for Interval Meters

##### 2.1.4.1 → Dual Device Sites

When there is no validated primary data then an estimate will be based on using a copy of validated secondary data for the same period. If there is no validated secondary data available then an estimate will be made using the "same time last week" approach.

2.1.5 → Anticipated Annual Consumption¶

Anticipated annual consumption is determined in accordance with the following table by having regard to the size of the meter installed at the delivery point.¶

Meter Size¶	Anticipated Annual Consumption¶
- → For an AL6 meter:¶	100 MJ/d¶
- → For an AL12 meter:¶	550 MJ/d¶
- → Other Basic Meters:¶	Based on the nominal annual usage for that particular consumer¶

Sub-appendix 2.2 -- There is no Sub-appendix 2.2¶

**Sub-appendix 2.4 Sub-appendix 2.3 -- AEMO's Estimation Methodology for Gate Point Data, Net System Load and Interval Meters¶**

**Estimation of Data for Interval Meters¶**

In relation to estimates for a time interval of the 'Substitution Day' for net system load and interval meters, AEMO is to create an estimate of the data using the *like day*.

## Appendix 4– Auditor’s deed of **undertaking**

Commented [ND4]: For IN009/20W

9. The Covenantor agrees to provide a Report to the Covenantee within **23** months after the end of the year to which the Audit relates, which contains the information and content as set out in clause ~~359~~**358** of the Retail Market *Procedures*.



## FRC B2B System Interface Definitions

Commented [ND5]: For IN002/23W

### Transaction Data Elements

<b>Transaction:</b>	ServiceOrderRequest	
<b>Received From:</b>	User	
<b>Sent To:</b>	Network Operator	
Data Element	Vic/SA Mandatory / Optional / Not Required	Usage
LoadDetails/PerAnnum	O	<p>In SA, required where CustomerCharacterisation is a business customer (eg "Metropolitan Business" "Non Metropolitan Business") (and optional where CustomerCharacterisation is a residential customer):</p> <p>Service Connection Request (Job Enquiry Code = "SCR")</p> <p>Basic Meter Fix (Job Enquiry Code = "MFX")</p> <p>Optional for:</p> <p>Basic Meter Change (Job Enquiry Code = "MCH")</p> <p>Service Upgrade (Job Enquiry Code = "USR")</p> <p>Meter Size Upgrade (Job Enquiry Code = "UMS")</p> <p>Downgrade Meter (Job Enquiry Code = "DMS")</p> <p>In WA required for Job Enquiry Codes "<del>CLT</del>SCR", "ECO", "CLT", "UMS".</p> <p>In WA Optional for "RML", "MFX", "<del>SGFT</del>CR" "MTN" and "RSD".</p> <p>Otherwise Not Required in SA or WA.</p> <p>For compliance with the schema, if a PlumberLicenceNumber is provided, then LoadDetails/PerHour must be populated. For new installations, the LoadDetails/PerHour shall reflect the actual requirement. For re-instatement of service after a period greater than 730 days, the LoadDetails/PerHour shall be populated with '0'.</p>

## B2B Service Order Specifications (WA Only) – Part 1

Service Order Request Elements - Western Australia		Meter & Service Connection Request Cluster Development	Upgrade Meter and or Service Request	Apply Meter Lock Regulator Removal Request Disconnect Service in Street	Remove Meter Lock Regulator Reinstall Request	Permanent Service Disconnection Request	Meter Retake and Test	Disatisfied Customer	Other
Data Elements	General Usage Notes	SCR CLT ECO	UMS	AML* MRM* DSD* TCI*	RML MTN RSD TCR	SDR	MRT	DFC	OTH
SORDSpecialComments/CommentLine	Required for DFC to provide detail of complaint (ore reference to email, etc.), optional for all other SO, field may be populated at the CSR discretion	O	O	O	O	O	O	R	R
CustomerCharacterisation	Not used in WA	NR	NR	NR	NR	NR	NR	NR	NR
LoadDetails/PerHour	This value must be populated for JobEnquiryCode SCR, ECO, CLT and UMS. The value used must be the anticipated maximum hourly load in MJ. For compliance with the schema, if a PlumberLicenceNumber is provided, then LoadDetails/PerHour must be populated. For new installations, the LoadDetails/PerHour shall reflect the actual requirement. for re-instatement of service after a period greater than 730 days, the LoadDetails/PerHour shall be populated with '0'.	R	R	NR	O	NR	NR	NR	NR
LoadDetails/PerAnnum				NR	NR	NR	NR	NR	NR
MeterInletPressure	This value must be populated for JobEnquiryCode SCR, ECO, CLT and UMS. The value used must be the required meter inlet pressure which will be defaulted to 2.75 kPa or (1.25 kPa in low pressure areas).	R	R	NR	NR	NR	NR	NR	NR

## Attachment B – PPC RESPONSE TEMPLATE

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

- Section 1 seeks feedback on AEMO's examination of the proposal in Sections 1–9 (i.e., whether AEMO has correctly captured the requirements and surrounding context of the proposal)
- Section 2 seeks feedback on the proposed changes listed in attachment A.

Anyone wishing to make a submission to this PPC consultation are to use this response template. Submissions close **COB 26 April 2024** and should be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au).

## Attachment C – GMI Response for Package 6 2023 – WA Minor Changes

### Part A - General Comments on the proposal

Question	Ref #	Participant	Response	AEMO Response
<p>1) In terms of the specific proposal and impacts of change (see section 4 and 5 of the GMI) for the following initiatives,</p> <ul style="list-style-type: none"> <li>IN009/20W Typographical error in 'Auditor's deed of undertaking'</li> <li>IN002/22W Issue with WA participant deregistration</li> <li>IN002/23W Fix minor documentation errors in WA Technical Protocol</li> <li>IN001/24W Fix clause numbering in Appendix 2 of RMP WA</li> </ul> <p>does your organisation support the proposal as it is described in the GMI? If not, what changes need to be made?</p>	1	AGL	AGL supports these proposed changes to the WA procedures.	AEMO notes AGL's support for the proposed changes.
	2	Alinta	Alinta Energy agrees with the proposed amendments, with further minor amendments proposed to clause 16(1) and Appendix 2 per Part B.	AEMO notes Alinta's support for the proposed changes. AEMO agrees with the further minor improvements suggested by Alinta. See ref #23 and 24.
	3	Kleenheat	IN009/20W – Support IN002/22W – Support IN002/23W – Support IN001/24W - Support	AEMO notes Kleenheat's support for the proposed changes.
	4	Origin	<b>IN009/20W</b> - Agree with proposed changes. <b>IN002/22W</b> - Agree with proposed changes. <b>IN002/23W</b> – Agree with proposed changes. <b>IN001/24W</b> - Agree with proposed changes.	AEMO notes Origin's support for the proposed changes.
	5	Synergy	Synergy supports this proposal. Synergy notes that package 6 is focused on correcting errors, providing further clarity and updates to reflect current business process in WA. Synergy assumes this approach also applies to the changes for the Technical Protocol, in relation to IN002/23W, where system changes to	AEMO notes Synergy's support for the proposed changes.  AEMO discussed the need for system changes with Synergy. AEMO clarified that changing the attribute for the field LoadDetails/PerAnnuam to 'R'equired



Question	Ref #	Participant	Response	AEMO Response
			<p>validate, test or recertify the Service Order Request (SOR) transactions may be required.</p> <p>Synergy assumes AEMO will provide further clarity on IN002/23W, as part of the procedure change (PPC) consultation process, in relation to whether partial recertification and testing will be required.</p>	<p>does not make it 'M'andatory and hence there should be no need for system changes. Synergy agreed with AEMO and has provided the following confirmation via an email.</p> <p><i>'Synergy understands the proposed change is required solely to correct a minor discrepancy between the B2B Service Order Specifications and the FRC B2B System Interface Definitions. That is, no system changes are required that affects how the market currently processes these transactions. Therefore, there is no requirement to recertify the Service Order Request transaction'.</i></p>
	6	ATCO	<p>IN009/20W – ATCO supports the proposed changes in this GMI.</p> <p>IN002/22W - ATCO has no issues with the proposed changes in this GMI.</p> <p>IN002/23W – ATCO supports the proposed changes in this GMI.</p> <p>IN001/24W – ATCO supports the proposed changes in this GMI.</p>	<p>AEMO notes ATCO's support for the proposed changes.</p>

Question	Ref #	Participant	Response	AEMO Response
2) In relation to IN002/21W Anticipated annual consumption for basic meters, do you support AEMO's assessment that it does not require procedure change process under Chapter 9 of the RMP WA? If not then please provide the reason for not supporting it.	7	AGL	AGL supports AEMO's assessment.	AEMO notes AGL's support for AEMO's assessment.
	8	Alinta	Alinta Energy supports AEMO's assessment that IN002/21W does not require the procedure change process under Chapter 9.	AEMO notes Alinta's support for AEMO's assessment.
	9	Kleenheat	Support	AEMO notes Kleenheat's support for AEMO's assessment.
	10	Origin	AEMO has demonstrated that version 6.6 of REMCo Rules highlights that chapter 9 only applies to amending and updating sub-appendix 2.3. Anticipated annual consumption for basic meters is under 2.1 of the same rules.  Origin supports AEMO and ATCO working collaboratively to raise a GMI that can be reviewed by the GRCF.	AEMO notes Origin's support for AEMO's assessment.
	11	Synergy	Yes, Synergy supports this approach providing the corrections to the GRMP are made prior to the or concurrent with the proposed changes with IN001/24W. Synergy considers this sequencing is necessary for regulatory certainty and to ensure the ERA will support the change to IN002/21W in relation to procedural consistency.	AEMO notes Synergy's support for AEMO's assessment.

Question	Ref #	Participant	Response	AEMO Response
	12	ATCO	IN002/21W – ATCO agrees that the anticipated annual consumption for basic meters does not require the procedure change process under Chapter 9 of the RMPs.	AEMO notes ATCO's support for AEMO's assessment.
3) In relation to IN001/24W Fix clause numbering in Appendix 2 of RMP WA, do you agree with AEMO's proposed numbering within Appendix 2.	13	AGL	AGL supports AEMO's assessment.	AEMO notes AGL's support for AEMO's assessment.
	14	Alinta	Alinta Energy supports the proposed numbering for Appendix 2 per the example provided in Attachment A of the GMI.	AEMO notes Alinta's support for AEMO's assessment.
	15	Kleenheat	Support	AEMO notes Kleenheat's support for AEMO's assessment.
	16	Origin	The numbering for Basic Metering Verification is expanded for the two different steps ie. 2.1.1.1 and 2.1.1.2  Recommend consistent numbering for Intervals Metering verification where there are 3 verification steps:  2.1.2.1 Device Checks 2.1.2.2 Primary to Secondary Checks 2.1.2.3 Trend Checks	AEMO notes Origin's comment.  AEMO notes that the RMP extract included is just an example and shows 2 steps. In the RMP there are 4 steps as follows:  2.1.2.1 Device Checks 2.1.2.2 Primary to Secondary Checks 2.1.2.3 Trend Checks 2.1.2.4 Pass / Fail Limits
	17	Synergy	Synergy supports this proposal.	AEMO notes Synergy's support for AEMO's assessment.
	18	ATCO	IN001/24W – ATCO supports the proposed numbering within Appendix 2.	AEMO notes ATCO's support for AEMO's assessment.

Question	Ref #	Participant	Response	AEMO Response
4) Do you have any further comments on any other sections of the GMI you wish to raise? If so, please provide further details.	19	Kleenheat	No	
	20	Origin	No	
	21	Synergy	No further comments from Synergy.	
	22	ATCO	None	

## Part B – Feedback on the documentation changes

Retail Market Procedures (Western Australia)					
Ref #	Organisation	Clause #	Issue / Comment	Proposed text Red <del>strikeout</del> means delete and blue <u>underline</u> means insert	AEMO Response (AEMO only)
123	Alinta	16(1)	Grammatical error. Suggested amendment.	[...] is not a procedure change <del>under</del> <u>and</u> Chapter 9 does not apply to the amendment.	AEMO agrees with Alinta's suggested change as it adds further clarity.
24	Alinta	Appendix 2	Suggested title for Sub-appendix 2.1 as per Sub-appendix 2.3.	<a href="#">Sub-appendix 2.1 – ATCO Gas Australia's Estimation and Verification Methodology for Basic and Interval Meters</a>	AEMO agrees with Alinta's suggested change as it adds further clarity.
B2B Service Order Specifications (WA Only) – Part 1					
Ref #	Organisation	Clause #	Issue / Comment	Proposed text Red <del>strikeout</del> means delete and blue <u>underline</u> means insert	AEMO Response (AEMO only)
FRC B2B System Interface Definitions					
Ref #	Organisation	Clause #	Issue / Comment	Proposed text Red <del>strikeout</del> means delete and blue <u>underline</u> means insert	AEMO Response (AEMO only)