



Economic Regulation Authority

Decision on gas retail market scheme: Procedure change proposals IN009/20W, IN002/22W, IN002/23W and IN001/24W

Submitted by the Australian Energy Market Operator

20 August 2024

Acknowledgement of Country

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We acknowledge their continuing connection to culture and community, their traditions and stories. We commit to listening, continuously improving our performance and building a brighter future together.

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Decision

On 24 June 2024, the Economic Regulation Authority received a submission from the Australian Energy Market Operator (AEMO) seeking approval of four proposals to amend the Western Australian gas retail market scheme as outlined in procedure change proposals IN009/20W, IN002/22W, IN002/23W, and IN001/24W.

The proposed amendments are:

- IN009/20W: To amend a typographical error in Appendix 4 of the Retail Market Procedures (WA) (the Procedures) and extend the period for completing an audit report from two months to three months.
- IN002/22W: To rectify existing issues in the current process to deregister a gas retail market participant by allowing sufficient time to process any outstanding payments due to the participant.
- IN001/24W: To reintroduce clause numbering in Appendix 2 of the Procedures and make several minor typographical corrections to clause 16.
- IN002/23W: To rectify minor discrepancies between two scheme technical documents underlying the scheme.

In accordance with section 11ZOM(a) of the *Energy Coordination Act 1994*, the ERA approves the amendments in procedure change proposals IN009/20W, IN002/22W, and IN001/24W as submitted by AEMO.

Under section 11ZOM(b) of the *Energy Coordination Act 1994*, the ERA requires the procedure change proposal IN002/23W to be amended in line with Appendix 3 of this decision paper, to ensure the correct terminology and process is used for the Western Australian market. The ERA approves the amendments once these changes have been made.

The ERA considers that these amendments will improve business processes, increase efficiencies and reduce administrative costs.

In accordance with clause 386(2) of the Procedures, the approved amendments will take effect on 16 September 2024, as specified by the ERA in the *Western Australian Government Gazette*.

1. Background

The Western Australian gas retail market scheme covers the gas distribution systems operated by ATCO Gas Australia Pty Ltd and has the following elements:

- The WA Gas Retail Market Agreement, which is the agreement between AEMO (the retail market operator) and gas market participants.^{1,2}
- The Retail Market Procedures, which govern the requirements and process for gas full retail contestability (FRC) in the distribution systems covered by the scheme.
- The FRC Hub Operational Terms and Conditions, which is the communication infrastructure operated by AEMO through which market participants can deliver and receive messages using defined protocols and formats.
- The AEMO Specification Pack, which includes a set of documents that provide the technical specifications for how AEMO and market participants are to implement business processes to transfer information between each other's systems. These include:
 - *FRC Business to Business (B2B) System Interface Definitions*, which define the necessary interfaces required by market participants to build and test their internal information technology systems.
 - *B2B Service Order Specifications – Part 1* and *B2B Service Order Specification – Part 2*, which define how transactions are used to determine the work requirement and priority.

The ERA must review any proposed amendments to the gas retail market scheme in accordance with Part 2B of the *Energy Coordination Act 1994* (the Act) and Chapter 9 of the Retail Market Procedures (the Procedures).

The Gas Retail Consultative Forum (GRCF) facilitates consultation on potential amendments to the scheme. The GRCF is comprised of AEMO, market participants (participants), pipeline operators, prescribed persons, and interested persons.^{3,4} The ERA is an observer at the GRCF.

In consultation with the GRCF, AEMO consults on proposed amendments to the gas retail market scheme and submits proposals to the ERA for approval.

1.1 Legislative requirements

When considering a proposed amendment to the scheme, the ERA may approve it; request that it be changed and approve it in a changed form; or refuse to approve it.⁵

¹ A retail market scheme for a distribution system must consist of one or more agreements made between gas market participants, a retail market operator, and a set of retail market rules. See *Energy Coordination Act 1994* (WA), clause 11ZOF(1), ([online](#)).

² Market participants include users (i.e., retailers) and the network operator (currently ATCO Gas in WA). See Retail Market Procedures (WA), 3 August 2020, clause 2, ([online](#)).

³ Retail Market Procedures (WA), 3 August 2020, clause 381(5), ([online](#)).

⁴ An 'interested person' is a government representative, the ERA, or any person that the ERA or AEMO considers has a legitimate interest in the matter or should be consulted in relation to the matter. A 'prescribed person' includes a swing service provider, a shipper or a self-contracting retailer. See Retail Market Procedures (WA), 3 August 2020, clause 2, ([online](#)).

⁵ *Energy Coordination Act 1994* (WA), clause 11ZOM, ([online](#)).

The ERA may approve any amendments to the scheme if it considers that the amendments will:

- Comply with the Act.
- Be suitable for the purpose of the scheme, which is “to ensure that the retail gas market that is supplied through the system is regulated and operates in a manner that is open and competitive; efficient; and fair to gas market participants and their customers”.⁶

The ERA can also consider any other relevant matters in making its decision.⁷

Prior to approving any amendment, the ERA must ensure that:

- Scheme members have consulted with prescribed persons and gas transmission operators whose pipeline is used to transport gas into the system.⁸
- Each person required to be consulted has agreed to the amendment, or if they have not agreed, then they have been given a reasonable opportunity during consultation to provide reasons for not agreeing, and the ERA must consider these reasons.⁹

⁶ Ibid, clause 11ZOB and 11ZOO(a).

⁷ Ibid, clauses 11ZOO(b).

⁸ Ibid, clause 11ZOL(3).

⁹ Ibid, clause 11ZOO(2).

2. Discussion

In June 2024, AEMO sought the ERA's approval of four proposals to amend the gas retail market scheme.¹⁰ AEMO consulted with GRCF members in forming these proposals.

The amendments are proposed to improve the functioning of the market and better reflect current business processes and fix several minor typographical errors:

- Proposal 1 (IN009/20W) amends a typographical error in Appendix 4 of the Procedures and extends the period for providing an audit report from two months to three months.
- Proposal 2 (IN002/22W) rectifies identified issues with the current process to register a gas retail market participant.
- Proposal 3 (IN001/24W) corrects several errors in Clause 16 of the Procedures and reintroduces clause numbering in Appendix 2 of the Procedures.
- Proposal 4 (IN002/23W) rectifies a discrepancy between two technical documents.

AEMO requested the ERA to consider, endorse, and publish its approval of the changes by 30 August 2024, with an effective commencement date of 16 September 2024. A summary of the proposed timeline is available in Appendix 1.

In its proposals, AEMO submitted that the proposed amendments may require minor process changes but will not materially impact scheme participants.

The proposed changes are summarised below.

2.1 Proposal 1: Typographical error in 'Auditor's deed of undertaking' (IN009/20W)

The first proposal includes several changes to Appendix 4 of the Procedures, which contains the terms and conditions of the "Auditor's deed of undertaking."

Retailers and the network operator must annually engage an auditor to verify their compliance with certain provisions of the Procedures.^{11,12} The same requirements apply to AEMO on a triennial basis.¹³ In doing so, each participant must ensure that the auditor signs a deed of undertaking substantially in the form set out in Appendix 4 of the Procedures.¹⁴

Clause 9 of Appendix 4 requires the auditor to provide its report to the network operator and retailers within two months after the end of the year to which the audit relates. Participants have a further month to provide this report to AEMO.^{15,16}

¹⁰ Australian Energy Market Operator, 21 June 2024, *Approval of amendment to the Retail Market Scheme – Procedure and AEMO Specification Pack Changes related to Gas Retail Market Package 6 – 2023 WA (IN009/20W, IN002/22W, IN002/23W and IN001/24W)*, ([online](#)).

¹¹ Retail Market Procedures (WA), 3 August 2020, Clause 350(2) ([online](#)).

¹² *Ibid*, Clause 352(1).

¹³ *Ibid*, Clause 351.

¹⁴ *Ibid*, Clause 356(1).

¹⁵ *Ibid*, Clause 350(3)(b).

¹⁶ *Ibid*, Clause 352(2)(b).

In its proposal, AEMO submitted that the two-month period for the auditor to provide its report to the network operator and retailers does not reflect industry practice.¹⁷ As such, AEMO proposes to amend Appendix 4 to require the auditor to provide its report to AEMO and participants within three months after the end of the year to which the audit relates. In this way, the proposal aims to align the provisions of the Procedures with the industry practice.

The ERA notes that clauses 350(3)(b) and 352(2)(b) of the Procedures already require participants to provide their auditor's reports to AEMO within three months after the end of the year. The two-month period set out in clause 9 of Appendix 4 is only misaligned with the requirement for the auditor to provide its report to AEMO by three months, set out in clause 351(3)(b) of the Procedures.

As a result, the proposed amendment, while aligning the requirements of Appendix 4 and of the Procedures for AEMO, will extend the period available to the auditor before it must provide its reports to the participants.

The ERA discussed the proposal with AEMO. AEMO advised that the change was requested by a participant due to difficulties in meeting the two-month timeframe. Considering the audit process commences in January of each year, the participants have indicated that availability of the auditor or their own internal staff may be an issue due to the holiday period. AEMO also observed that participants and their auditors can mutually agree to make minor changes to the deed in Appendix 4.

AEMO submitted that the proposed change formalises existing business practice without affecting the current audit process and the three-month timeframe for the participants to provide their final auditor's report to AEMO. AEMO further observed that the auditors generally discuss their findings with the participants during the auditing process and, when required, may follow up their audit report with an improvement report for the participant to implement after the three-month period.

In a further change, AEMO proposed to amend clause 9 in Appendix 4 to refer to clause 358 instead of clause 359 of the Procedures.¹⁸

AEMO considers that the proposed changes will provide more clarity and reduce administrative costs. AEMO expects there will be no impact on market participants associated with the proposed changes. GRCF participants did not object to the proposed changes during AEMO's consultation. AEMO considers that the proposal does not disadvantage market participants or their customers.

2.2 Proposal 2: Issue with WA participant deregistration (IN002/22W)

This proposal originated following a market participant's deregistration from the WA gas retail market scheme.¹⁹ During the deregistration process, AEMO identified that the Procedures do not currently allow sufficient time to allocate and repay all the User's Reconciliation Adjustment

¹⁷ For example, the auditor must provide its report to AEMO on AEMO's compliance with the Procedures within three months after the end of the year. Retail Market Procedures (WA), 3 August 2020, Clause 351(3)(b), [\(online\)](#).

¹⁸ Clause 359 requires the person who appoints an auditor to ensure that the scope of the audit is adequate. Clause 358 sets out the "information and content" to be included in the audit report, to which clause 9 in Appendix 4 refers.

¹⁹ AEMO advised that this was the first deregistration that occurred since the scheme commenced.

Amount (URAA) and Swing Service Repayment Quantity (SRQ) before deregistration takes effect.^{20,21} These payment mechanisms are further explained below.

AEMO's gas allocation process for each sub-network includes calculating retailers' gas withdrawal quantities for each gas day.^{22,23} These calculations are based on meter readings and include both the withdrawal for the gas day and adjustment over the previous 425 days due to revision in meter readings.²⁴ The adjustment amount is known as the URAA. To avoid spikes in the daily gas allocation, the total adjustments amount is spread over 28 days and added to the amount of gas a retailer must procure for delivery to a sub-network over the next 28-day period, starting in two days' time.^{25,26} Effectively, the URAA represents a 1/28th portion of the total adjustments that are needed.²⁷

The SRQ is used alongside the URAA in AEMO's gas allocation calculations.²⁸ A retailer will generally nominate gas for delivery from a pipeline into a sub-network based on an estimate of their customers' demand for gas on that day.²⁹ This figure may not match the amount of gas their customers withdraw on that day. To resolve the mismatch, gas can be either notionally borrowed from or stored in another pipeline through the swing service mechanism. A retailer will need to repay the gas "borrowed" under the loan swing service or retrieve the gas "stored" under the park swing service in two days' time.^{30,31} These quantities of the gas to be repaid or retrieved are known as the SRQ.³²

For a retailer to exit the market, clause 377B(2) of the Procedures requires that either:

- another entity takes over the retailer's obligations, or
- 453 days pass after the retailer ceases to be active in the market.³³

However, AEMO identified that an additional three days beyond 453 days are required to enable the last URAA and SRQ amounts be calculated and repaid. Figure 1 illustrates the issue:

²⁰ Retail Market Procedures (WA), 8 August 2020, Clause 245, ([online](#)).

²¹ Ibid, Clause 298, ([online](#)).

²² A gas day is the 24 hours period starting at 0800 hours on a day and ending at 0800 hours on the following day. See Retail Market Procedures (WA), 8 August 2020, Clause 2, ([online](#)).

²³ Ibid, clause 228.

²⁴ Ibid, clause 218.

²⁵ Ibid, clause 245(1).

²⁶ Injecting means the process of delivering gas out of a pipeline through a gate point and into a sub-network. See Retail Market Procedures (WA), 8 August 2020, clause 2, ([online](#)).

²⁷ Retail Market Procedures (WA), 8 August 2020, clause 243(1), ([online](#)).

²⁸ For example, AEMO uses SRQ in calculating the user's estimated total withdrawals. See: Retail Market Procedures (WA), 8 August 2020, Clause 228, ([online](#)).

²⁹ Retail Market Procedures (WA), 8 August 2020, clause 178(b), ([online](#)).

³⁰ Ibid, clause 298.

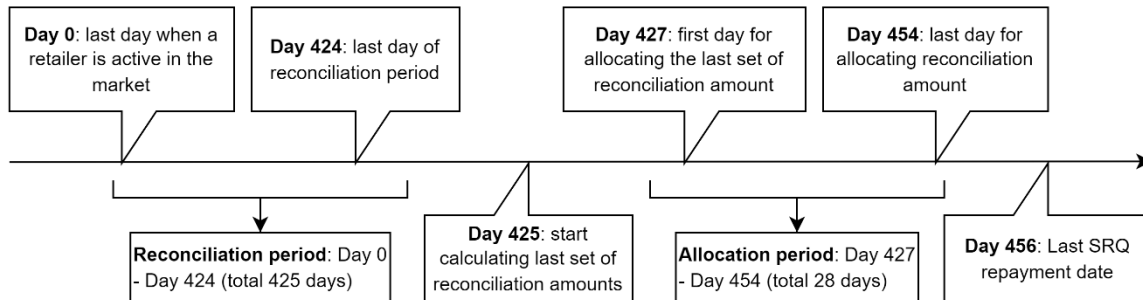
³¹ Repay in relation to swing service means (a) for *loan swing service* – to cause the gas which notionally borrowed from a pipeline under the loan swing service to be repaid and (b) for *park swing service* – to cause the gas which was notionally stored in the pipeline under the park swing service to be retrieved. See AEMO, Retail Market Procedures (WA), 8 August 2020, clause 2, ([online](#)).

³² Ibid, clause 299.

³³ The clause refers to 425 days + X which equals to 28. See Retail Market Procedures (WA), 8 August 2020, Clause 243(4) ([online](#)).

1. Errors in meter readings associated with the retailer's trading activities will continue filtering through in the URAA calculations up to and including 454 days after the retailer stops participating in the market.
2. Two extra days are then needed to repay the last SRQ amount since the retailer will continue to be liable for SRQ until the reconciliation amount is fully allocated.

Figure 1: Reconciliation process timeline



Source: ERA interpretation of the Procedures

AEMO proposed to extend current deregistration period for a retailer by three days to 456 days. AEMO considers that the proposed change will improve the reconciliation process by enabling a retailer to exit the market after all URAA and SRQ has been allocated and drive minor efficiencies.

AEMO expects there will be no impact on participants. No participants objected to the proposal.

2.3 Proposal 3: Fix clause numbering in Appendix 2 of the Procedures (IN001/24W)

This proposal includes several minor typographical changes to clause 16 and Appendix 2 of the Procedures:

- Update the title of clause 16 which currently erroneously repeats the title of clause 15. The proposed title of "*Chapter 9 (Procedure change process) does not apply to amending and updating Appendices*" is in line with the content of clause 16.
- Correct a typographical error in clause 16 by replacing the word "under" with "and" to improve readability.³⁴
- Delete references to the incorrect title of sub-appendix 2.3 in clause 16.³⁵

³⁴ Currently, the first paragraph reads that an amendment to Appendices 1, 2 (excluding sub-appendix 2.3), 7, and 8 "*is not a procedure change under Chapter 9 does not apply to the amendment.*" The revised wording will provide that an amendment to the specified Appendices "*is not a procedure change and Chapter 9 does not apply to the amendment.*"

³⁵ Clause 16 requires any changes to sub-appendix 2.3 to be subject to a procedure change process. However, Appendix 2 does not contain any numbering. Clause 16 did not contain any indication of what the provisions in Appendix 2 were between when AEMO took over market operation from REMCo in 2016 until 2020. In 2020, clause 16 was amended to include the title of sub-appendix 2.3 as "Estimation of Data for Basic Meters". However, this was incorrectly amended as the title should have updated from the earlier title "REMCo's Estimation Methodology for Gate Point Data, Net System Load and Interval Meters". AEMO demonstrated that the 2020 amendments did not reflect the original intention of the provision. AEMO's proposed amendments reinstate the original intention of clause 16.

- Reinstatement clause numbering and titles for sub-appendices in Appendix 2 to improve readability.

AEMO considers that the proposed changes will correct minor errors to improve readability and clarity of the Procedures. This will improve future procedure change consultations and reduce administrative costs.

AEMO expects there will be no impact on participants. No participants objected to the proposal.

2.4 Proposal 4: Fix minor documentation errors in WA Technical Protocol (IN002/23W)

These proposed changes correct minor errors in two *WA Technical Protocol* documents – the *FRC B2B System Interface Definitions* document and the *B2B Service Order Specifications – Part 1* document.

The *FRC B2B System Interface Definitions* document defines how participants communicate in the FRC Hub, an automated communication facility operated by AEMO.³⁶ Exchanging messages in the FRC Hub requires participants to follow specified protocols and formats.

The *B2B Service Order Specifications* details what requests a retailer can raise with the network operator ATCO. For example, if a customer asks work to be undertaken on a customer's premises. These requests are identified as job codes which include:

- SCR, where a retailer asks to connect a new gas customer.
- ECO, which refers to Emergency Change Over.
- CLT, which is used to initiate a new connection on a strata-titled property.
- UMS, which initiates a meter set pressure change and/or meter size change.
- TCR, which is used to request removal of a Trailer Air Coupling device and restore gas supply.

Each type of request has different information requirements which can be found in both *FRC B2B System Interface Definitions* and *B2B Services Order Specifications – Part 1*. The documents, however, contain several discrepancies:

- ATCO requires a retailer to provide an estimate of customer's expected annual load for the job codes SCR, ECO, CLT, and UMS. To reflect ATCO's requirements, AEMO proposes updating the fields for these transaction codes from "Optional" to "Required".
- Currently, the CLT code is duplicated in *FRC B2B System Interface Definitions*. AEMO proposes to replace the duplicate CLT code with SCR.
- AEMO proposes updating the *FRC B2B System Interface Definitions* to reflect when providing an estimate of customer's expected annual load is Optional. The document currently refers to code "MFX", which is not used in Western Australia and invalid code SCF which AEMO proposed to replace with TCR.

³⁶ Apart from customer transfers, participants will primarily use the Gas Market Retail System for their market communications and transactions.

AEMO considers that the proposed changes will ensure service orders are raised with correct service order request codes, which will improve business processes and reduce administrative costs.

AEMO expects the proposed amendments will require minor process changes by market participants to ensure that the correct service order or request code is used in service orders. AEMO expects there will be negligible implementation costs. None of the market participants submitted anything to the contrary or objected to the proposal.

The ERA observes that the tracked changed version of the Procedures included with AEMO's proposals includes several changes to one of the data dictionaries in *FRC Business to Business (B2B) System Interface Definitions*. AEMO advised that these changes relate to Gas Retail Market Retailer of Last Resort Procedures, Guidelines and Processes for the east coast and became effective on 1 May 2024.³⁷ The changes are not applicable to Western Australia and are beyond the ERA's jurisdiction.

In reviewing this proposal, the ERA identified another discrepancy between the FRC B2B System Interface Decisions and B2B Service Order Specifications - Part 1 documents. The former specifies that providing an estimate of customer's expected annual load for job codes RML, MFX, SCF, MTN and RSD is Optional in WA. However, this information is Not Required under the latter. AEMO confirmed that code MFX is not used in Western Australia, and retailer's service requests do not need to contain an estimate of customer's expected annual load unless it is for codes ECO, UMS, CLT, and SCR.

Therefore, the ERA approves deleting the sentence '*In WA Optional for "RML", "MFX", "SCF", "MTN" and "RSD" in FRC B2B System Interface Definitions as outlined in Appendix 3 of this paper to align provisions in FRC B2B System Interface Definitions with B2B Services Order Specifications – Part 1.*

2.5 Consultation process

AEMO must consult with the GRCF prior to submitting its proposal to the ERA. AEMO must invite each participant, pipeline operator, prescribed person, and interested person to provide feedback on its procedure change proposals as submitted to the ERA within ten business days of submission.³⁸

On 11 April 2024, AEMO published its Proposed Procedure Change (PPC) inviting comments from market participants. During the consultation period, AGL, Alinta Energy, ATCO, Origin Energy, and Synergy expressed their support for AEMO's amendments, proposed in the PPC.

On 6 May 2024, AEMO published the Impact and Implementation Report (IIR) for comment. AEMO received four submissions, from AGL, Alinta Energy, Origin Energy, and Synergy, all supporting the proposed changes.

On 24 June 2024, AEMO advised market participants that it had submitted procedure change proposals IN009/20W, IN002/22W, IN001/24W, and IN002/23W to the ERA for approval and provided information on how to make a submission to the ERA by 8 July 2024.

³⁷ Australian Energy Market Operator, 6 September 2023, 'Gas Retail Package 5 – 2023 RoLR Consultation', ([online](#)) [accessed on 26 July 2024].

³⁸ Retail Market Procedures (WA), 3 August 2020, Clause 383(4), ([online](#)).

The ERA received two submissions on AEMO's proposed amendments, provided in Appendix 2 of this paper. Both submissions were supportive of the proposed amendments.

In the absence of any submissions opposing the amendments, the ERA accepts that each person who is required to agree with the amendments set out in proposals IN009/20W, IN002/22W, IN001/24W, and IN002/23W has agreed and that the requirements under section 11ZOO(2) of the Act and section 384(4) of the Procedures have been satisfied. AEMO has completed the consultation process required by the Act and Procedures.

3. The ERA's assessment

To approve an amendment, the ERA must be satisfied that the retail market scheme will:

- comply with the Act
- be regulated and operate in a manner that is:
 - open, competitive, and efficient
 - fair to gas market participants and their customers.

The ERA is satisfied with evidence provided by AEMO that the amendments correct existing errors and deficiencies outlined in sections 2.1 to 2.4.

The ERA is satisfied that the changes will provide greater certainty to the market participants, improve clarify, lower barriers to entry by assisting new entrants to better understand their obligations, and result in improved economic efficiency.

The amendments will not impose any additional obligations on customers or remove existing customer protections as they fix existing errors and deficiencies in the technical documents underlying the effective functioning of the market. AEMO's URAA and SRQ calculations will continue be subject to audit under clause 351 of the Procedures. Changing reference from clause 358 to clause 359 in Appendix 4 does not impact market participant's obligations to comply with clause 359 of the Procedures.

The ERA considers that the amendments are fair to market participants as they rectify existing issues. The costs of the changes will not be significant and will likely be offset by improvement in business processes. For the proposal IN009/20W, extending the existing two-month timeframe for the auditor providing their report to participants reflects current business practice and will not affect the existing audit process. The proposal will also not impact timing for the participants to pass their auditor's report to AEMO. Under the current process, participants and their auditors can agree on extended timeframes for providing of the auditor's report. Therefore, changing the timeframe in Appendix 4 will not result in extra costs for consumers.

Feedback from market participants during AEMO's consultation processes were supportive of the amendments. The ERA received submissions from Alinta Energy and AGL that support the proposed changes. These submissions are provided in Appendix 2.

The ERA is satisfied by AEMO's assessment that the proposed amendments do not contravene any applicable laws, including the Act and the Procedures.

The ERA is satisfied that the requirements under the Act have been met for amendments in proposals IN009/20W, IN002/22W, and IN001/24W approves the procedure change proposals as submitted by AEMO.

AEMO confirmed that code MFX is not used in Western Australia, and retailer's service requests do not need to contain an estimate of customer's expected annual load unless it is for codes ECO, UMS, CLT, and SCR. Therefore, the ERA approves proposal IN002/23W subject to the changes set out in Annexure 3 to align provisions in *FRC B2B System Interface Definitions* with *B2B Services Order Specifications – Part 1*.

The approved amendments will take effect on 16 September 2024 as specified by the ERA in the *Western Australian Government Gazette*.

Appendix 3 sets out the amendments which have been approved.

Appendix 1 Timeline of consultation process

The Retail Market Procedures outline the process that AEMO must follow to progress procedure change proposals.³⁹ The timeline for each procedure change proposal is outlined in Table 1.

Table 1: Timeline of consultation process

| Action | Date |
|---|---|
| PPC issued by AEMO to market participants for comment | 11 April 2024 5 submissions received |
| Submissions on PPC closed | 26 April 2024 |
| IIR issued by AEMO to market participants for comment | 6 May 2024 |
| Submissions on IIR closed | 3 June 2024 4 submissions received |
| AEMO published notice of decision | 24 June 2024 |
| Public consultation on AEMO's proposal opens | 24 June 2024 |
| Public consultation on AEMO's proposal closes | 8 July 2024 2 submissions received |
| The ERA decides whether to approve the amendments | 14 August 2024 |
| Approved amendments will be published in the <i>Western Australian Government Gazette</i> | Late August 2024 |
| Approved amendments will take effect (as per the ERA's notice in the <i>Western Australian Government Gazette</i>) | 16 September 2024 |

³⁹ Retail Market Procedures (WA), 3 August 2020, Chapter 9, ([online](#)).

Appendix 2 Submissions received

The ERA received two submissions from Alinta Energy and AGL, provided overleaf.

Submission from Alinta Energy



25 June 2024

██████████
Chair
Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

Dear ██████████

Amendment to the Gas Retail Market Scheme: Gas Retail Market Package 6 – 2023 WA

Alinta Energy supports the following procedure changes proposed by AEMO as part of Gas Retail Market Package 6:

- **IN009/20W** – Typographical error in 'Auditor's deed of undertaking'
- **IN002/22W** – Issue with WA participant deregistration
- **IN001/24W** – Fix clause numbering in Appendix 2 of RMP WA
- **IN002/23W** – Fix minor documentation errors in WA Technical Protocol

Alinta Energy has been actively involved in the development of these procedure changes and has made written submissions to AEMO at each stage of the consultation process.

The procedure changes primarily amend documentation errors and will provide market participants with greater clarity regarding market operations.

If you require additional information concerning this submission, please contact me on ██████████ or at ██████████.

Yours sincerely,

██████████
Manager WA Retail Regulation
Alinta Energy

Submission from AGL

From: [REDACTED]
Sent: Tuesday, July 9, 2024 1:20 PM
To: ERA Info <Info@erawa.com.au>
Subject: FW: ERA Application for the Approval of Gas Retail Package 6 2023 WA (IN009/20W, IN002/22W, IN001/24W and IN002/23W)

Good afternoon
Our apologies, we seem to have missed the deadline for making a submission.

AGL has been involved in the development and changes associated with the package of changes submitted by AEMO.

While we appreciate that we have missed the deadline, AGL wishes to formally confirm its support for these changes to the ERA.

Kind regards

[REDACTED]

[REDACTED]

Senior Industry Advisor

[REDACTED]

Appendix 3 Summary of amendments

Green underline text represents additions and ~~red strikethrough text~~ represents deletions.

The following amendments to the Procedures and technical documents have been approved:

IN009/20W: Typographical error in ‘Audit’s deed of undertaking’

Appendix 4 – Auditor’s deed of Undertaking

9. The Covenantor agrees to provide a Report to the Covenantee within ~~2~~ 3 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*.

IN002/22W: Issue with WA participant deregistration

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*,
- (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-market*, 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*.

(3) A *swing service provider* may not exit the market:

(a) while it is *active in the market*; and

(b) until the earlier of:

- (i) the day that is 2 days after the last day that the *swing service provider* was specified in a *contract note*; and
 - (ii) the day that the *swing service provider* demonstrates to AEMO's satisfaction that the *swing service provider* has an agreement with another person to fulfil the *swing service provider's* obligations under Chapter 5, a *SSPUD* and any contact note.
- (4) A *shipper* may not exit the market:
- (a) while it is *active in the market*; and
 - (b) until the day that the *shipper* demonstrates to AEMO's satisfaction that the *shipper* has an agreement with another person to fulfil the *shipper's* obligations under Chapter 5.
- (5) A person other than a *user*, a *swing service providers* or a *shipper* may not *exit the market* until it ceases to have any actual or contingent liability or obligation under these *procedures*.

IN001/24W: Fix clause numbering in Appendix 2 of the Retail Market Procedures (WA)

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 Basis 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.
- (3) Except as otherwise provided in these *procedures* and subject to clause 16(4), a *network operator* may amend those sections of Appendix 2.
- (4) Before any amendment to Appendix 2 takes effect, the *network operator* must:
- (a) consult each *user* and AEMO in relation to the amendment; and
 - (b) take into consideration any reasonable objection to, or request to alter, the proposed amendment, from *users* or AEMO; and

- (c) provide *notice* to each *participant* and *AEMO* (in such format as the *network operator* and *AEMO* may agree) of the amended Appendix at least 20 *business days* prior to the updated Appendix taking effect.
- (5) Before any amendment to Appendix 7 takes effect, *AEMO* must:
- (a) consult each *user*, *swing service provider* and *swing service provider of last resort* in relation to the amendment; and
 - (b) receive unanimous agreement from all *users*, all *swing service providers* and all *swing service providers of last resort* to the proposed amendment; and
 - (c) provide *notice* to each *participant*, *swing service provider* and *swing service provider of last resort* (in such format at *AEMO* reasonably may determine) of the amended Appendix at least 20 *business days* prior to the updated Appendix taking effect.
- (6) Before any amendment to Appendix 8 takes effect, *AEMO* must:
- (a) consult each *user* and *swing service provider of last resort* in relation to the amendment; and
 - (b) received unanimous agreement from all *users* and all *swing service providers of last resort* to the proposed amendment; and
 - (c) provide notice to each *participant* and *swing service provider of last resort* (in such format at *AEMO* reasonably may determine) of the amended Appendix at least 20 *business days* prior to the updated Appendix taking effect.

{Note: *AEMO* and the *SSPs* or *SSPOLRs* must execute variations to the *SSPUD* or *SSPOLRUD* prior to *AEMO* publishing amendments to Appendices 7 or 8. Amendments to Appendices 7 or 8 have no legal effect on the terms of any *SSPUD* or *SSPOLRUD*}

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 Verification of the 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 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 *Trent check Against Historical data*

The Network Management Information System (NMIS) checks that the data uploaded from the MHU results in gas usage that is within an expected range. This range is currently set as between 0 to 2000 % of the estimated usage. Nil consumption is allowed due to the high incidence of heating only consumers. An operator is alerted if the meter index reading is outside this range and has the option to:

- Use the meter index reading received if it seems reasonable based on previous billing history; or
- Use a system generated estimate; or
- Enter a reading. The latter is typically used when it is clear that the meter reader has entered the wrong number of digits, etc.

2.1.2 **Verification methodology from Interval Meters**

ATCO Gas Australia uses three types of verification checks:

- **Device checks** – where data from individual logging devices is compared with configurable limits
- **Primary to Secondary checks** – where data from different devices are compared. (This range of checks is used on sites where dual logging devices are installed)
- **Trend checks** – Hourly, daily and 7 daily historical comparisons.

The following checks describe the checks done for a more complex *interval-metered* site with multiple logging devices recording V_{un} , P, T and calculating V_{cr} and Z. Not all interval meter sites are so elaborated they range from:

- **Fixed factor sites**

These sites have a single datalogger recording the pulses from the flow meter pulse head and computing V_{cr} using fixed values for pressure and temperature

- **Measured P & T with single logger**

These sites have a single data logger that records the pulses from the flow meter pulse head, the output from the pressure and temperature transmitters and calculates V_{cr} from this data.

- **Measured P & T with dual logger**

These sites have two dataloggers that each record the pulses from the flow meter pulse head, the output from the pressure and temperature transmitters and calculates V_{cr} from this data. This enables the primary to secondary checks.

- **Measured P & T with flow computer**

These sites have a single flow computer that records the pulses from the flow meter pulse head, the output from the pressure and the temperature transmitters and calculates V_{cr} from this data whilst taking account of compressibility. The latter is calculated using the measured pressure and temperature inputs and stored gas quality parameters.

Thus only those checks that are feasible for the individual site are applied i.e. there is no trend check for pressure on a fixed factor site, nor is there a Primary to Secondary checks on single device sites.

2.1.2.1 *Device checks*

A range of checks are conducted on hourly data comparing V_{un} (volume uncorrected), V_{cr} (volume corrected for pressure and temperature), pressure and temperature values with site specific upper and lower limits.

Also included are checks to ensure the integrity of the incoming data e.g. $V_{cr} > 0$ when $V_{un} = 0$. V_{cr} is calculated based on the hourly V_{un} , pressure and temperature and compared against the V_{cr} value supplied by the logging device.

A further inclusion is a device health check, we establish that there are no device status alarms and that battery voltage is at a satisfactory level.

2.1.2.2 *Primary to Secondary checks*

Compares the incoming values for V_{un} , V_{cr} , pressure and temperature on sites that have dual logging devices between the two devices. This comparison identifies logger failures ranging from input card drift to full logger failure.

2.1.2.3 *Trend checks*

A range of trend checks is conducted on hourly and daily data by comparing the current data with historical data. This is possible as almost all meter sites have a fixed delivery pressure and a fairly constant delivery temperature when the meter is flowing. The aim of the check is to identify issues such as transmitter drift and flow meter contamination.

Three categories of checks are used:

- **Intra Day Checks**

Compares hourly temperature and pressure for each hour of the gas day during periods of consumption.

- **3 Week Pressure Transmitter Drift Check**

Average daily pressure of current gas day against average daily pressure for current gas day – 21.

- **Gas Consumption Trend**

V_{cr} for the current gas day is compared against the V_{cr} for the current gas day – 7.

2.1.2.4 *Pass/Fail Limits*

Pass and fail limits are set individually per site in ATCO Gas Australia's Gas Distribution Billing Data Verification (GDBDV) system, thus enabling effectual checks rather than having to adjust the pass / fail window to the lowest common denominator.

When GDBDV determines that a check fail the operator is alerted. Different alarm types exist and they range from:

- **Alert only** where the data is accepted automatically and the operator investigates the issues at a later stage and decides if corrective action is required.

- **Alert and operator release.** The Operator views the data and decides if it is accepted, amends the data or instructs the system to generate an estimate.
- **System Generate Estimate.** Where the system generates an estimate without seeking the operator's input, this typically occurs when there has been no data received for a site.

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:

Step 1. Calculate the mid-date of the estimation period.

Get the Start Date from the estimation period based on the most recent verified meter read.

$$\text{Mid Date} = \text{Start Date} + \frac{1}{2} (\text{Estimation Date} - \text{Start Date})$$

{Example: If the start date that consumption is to be estimated is for 31 Mar 2003 and the most recent verified meter read is 31 Dec 2002 then the mid period date is 14 Feb 2003.

$$\text{Mid Date} = 31 \text{ Dec } 2002 + \frac{1}{2} (31 \text{ Mar } 2003 - 31 \text{ Dec } 2002) = 14 \text{ Feb } 2003\}$$

Step 2. Retrieve the same time last year meter reading interval

Retrieve the verified meter read with a Start Date prior to the Mid Date in the previous year and with an End Date on or after the Mid Date in the previous year.

{Example: Retrieve same time last year meter reading interval for the site where start date is on or before 14 Feb 2002 and whose end date is on or after 14 Feb 2002.}

Step 3. Calculate the average daily consumption for the same time last year meter reading interval

Divide the consumption (i.e. energy consumption, in MJ) in the same time last year meter reading interval by the number of days in the same time last year meter reading interval to give the average daily consumption. Multiply this average daily consumption by the number of days in the Estimation period.

{Example:

| 2002 | | 2003 | |
|--|-------------------------|--|-----------------|
| Same Time Last Period Reading Interval | | Meter Reading Interval to be Estimated | |
| Verified Start meter read | Verified End meter read | Previous Verified meter read | Estimation date |
| 10 Jan 2002 | 28 Mar 2002 | 31 Dec 2002 | 31 Mar 2003 |
| 77 Days Consumption 6000MJ | | 90 Days Consumption? | |

$$\text{Average Daily Consumption} = 6000/77 = 77.92 \text{ MJ/Day}$$

$$\text{Estimation date (31 Mar 2003) - Date of previous verified meter read (31 Dec 2002) } \times \text{ MJ/Day}$$

$$= 90 \times 77.92 \text{ MJ/Day} = 7012.8\text{MJ}$$

If there is insufficient historical information or the number of days in the same time last year meter reading interval is less than 25 days then use the Type 2 Estimation Methodology.

2.1.3.2

Type 2A Estimation Methodology (“Same Time Last Period”)

ATCO Gas Australia uses this Estimation Methodology where the distribution supply point in respect of which the estimated value is to be calculated has less than 12 months consumption history or where the Type 1 Estimation Methodology could not otherwise be used. Where consumption is to be estimated:

Step 1. Retrieve the same time last period meter reading interval

Retrieve the verified meter read with a meter read date prior to the Start Date of the Estimation period.

{Example: If the date that consumption is to be estimated for 31 Mar 2003 and the most recent verified meter read is 31 Dec 2002 then search for the next most recent verified meter read.

| Estimation Date | Most recent verified meter read date | Next most recent verified meter read |
|-----------------|--------------------------------------|--------------------------------------|
| 31 Mar 2003 | 31 Dec 2002 | 30 Sep 2002 |

Therefore the same time last period meter reading interval will be 30 Sep 2002 to 31 Dec 2022.}

Step 2. Calculate the average daily consumption for the same time last period meter reading interval

Divide the consumption (i.e. energy consumption, in MJ) in the same time last period meter reading interval by the number of days in the same time last period meter reading interval to give the average daily consumption. Multiply this average daily consumption by the number of days in the Estimation period.

{Example:

| Same Time Last Period Meter Reading Interval | | Meter Reading Interval to be Estimated | |
|--|-------------------------|--|-----------------|
| Verified Start meter read | Verified End meter read | Previous Verified meter read | Estimation date |
| 30 Sep 2002 | 31 Dec 2002 | 31 Dec 2002 | 31 Mar 2003 |
| 92 Days Consumption 5000 MJ | | 90 Days Consumption? | |

$$\text{Average Daily Consumption} = 5000/92 = 54.35 \text{ MJ/Day}$$

Estimation date (31 Mar 2003) – Date of previous verified meter read (31 Dec 2002) x MJ/Day

$$= 90 \times 54.35 = 4891.3\text{MJ}$$

If there is insufficient historical information or the number of days in the same time last period meter reading interval is less than 25 days then use the Type 3 Estimation Methodology.

2.1.3.3 *Type 2B Estimation Methodology (“Average Daily Consumption”)*

ATCO Gas Australia uses this estimation methodology where the Type 1 or Type 2A Estimation Methodologies could not otherwise be used (e.g. for a newly commission supply point). In this case an Average Daily Consumption figure for the supply point is used to derive an estimate. The Average Daily Consumption figure is an energy value (in MJ) stored against the individual supply point. It is updated on an ongoing basis whenever a verified meter read is received. For new sites, the Average Daily Consumption is defaulted, depending upon the meter type:

- For an AL6 meter: 100 MJ/d
- For an AL2 meter: 500MJ/d
- Other Basic Meters: Based on a nominal annual usage for that particular consumer

Where consumption is to be estimated, multiply the Average Daily Consumption by the number of days in the Estimation period.

2.1.3.4 *Type 3 Estimation Methodology (“Otherwise Determined”)*

Where none of the Types of estimates provided in sections 2.1.3.1 to 2.1.3.3 is appropriate, a user and a network operator may agree an estimate.

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.

2.1.4.2 *Single Device Sites*

When there is no validated data available then estimate will be made using the “same time last week” approach.

2.1.4.3 *“Same Time Last Week” Method*

The value to be used as a substitute is taken from the same time of day as the interval to be substituted from a “Similar Day” of the previous week (or from within the current week for some weekdays). Public Holidays (PH) are treated as if they were a Sunday. Saturday and Sunday are to be treated normally even if they fall on a PH. The table below is based on the starting point that whilst Monday and Friday consumption patterns may be different from other weekdays the remaining weekdays are interchangeable. The “Alternate” and “2nd Alternate” similar days are used when the original “Similar” day is unsuitable because it falls on a PH.

| Substitution Day | “Similar Day” Day that is not a PH | “Alternate Similar Day” Day to be used if the “Similar Day” is PH | “2 nd Alternate Similar Day” Day if both “Similar Day” and “Alternate Similar Day” are PH |
|--------------------|---|--|---|
| Weekday PH | Most recent Sunday | | |
| Monday, not PH | Most recent Monday not a public holiday | | |
| Tuesday, not PH | Tuesday last week | Wednesday last week | Thursday last week |
| Wednesday, not PH | Wednesday last week | Tuesday this week | Thursday last week |
| Thursday, not PH | Thursday last week | Wednesday this week | Tuesday this week |
| Friday, not PH | Most recent Friday not a public holiday | | |
| Saturday, incl. PH | Most recent Saturday | | |
| Sunday, incl. PH | Most recent Sunday | | |

Examples: If we fail to get data for a site on Monday 8th of January 2007. In accordance with the table we would first try Monday 1 January 2007, and as this is a public holiday, we would next try Monday 25 December 2006, and as this is also a public holiday we finally end up using the data from Monday 18th December 2006 as estimate for Monday the 8th of January 2007.

Similarly if we need data for Friday the 2nd of May 2003, we first try Friday 25 April, ANZAC day, next try Friday 18 April, Good Friday, and finally use Friday 11th April.

2.1.4.4 *Estimates from estimated data*

The data from the “Similar Day” is used irrespective whether it is actual data, or that data itself was an estimate.

2.1.4.5 *Lack of substitute data*

If there is no suitable substitute day, for instance due to a lack of historical data on a new site, than the estimate may be determined in any method deemed suitable by the operators at his/her sole discretion.

One method the operator may consider is to derive an estimate using the nominal consumption, as agreed under the haulage contract, for that site and assuming a 9 hr a day, 7 day week operation. The normal annual consumption is divided by 3285 (9 Hrs * 365 Days) to determine the hourly flow to be used as estimate for each of the hours between 8 AM to 5 PM. The remaining hours between 5 PM to 8 AM are estimated as zero.

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 AL2 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 2.3 - ATCO Gas Australia's Estimation and Verification Methodology for Basic 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 substitution methodology* by using data from the same time interval of the first available 'Preferred Day' (as detailed in the table below) unless:

- The substitution day was a public holiday, in which case the most recent Sunday is to be used.
- The substitution day was not a public holiday but the 'Preferred Day' is a public holiday, in which case the substitution 'Preferred Day' to be used must be the most recent Preferred Day that is not a public holiday.

| Substitution Day | Preferred Day (in order of availability) |
|------------------|--|
| Monday | Monday ** |
| Tuesday | Tuesday** Wednesday** Thursday** |
| Wednesday | Wednesday** Tuesday* Thursday** Tuesday** |
| Thursday | Thursday** Wednesday* Tuesday* Wednesday** Tuesday** |
| Friday | Friday** |
| Saturday | Saturday** |
| Sunday | Sunday** |

Note * Occurring in the same week as the substitution day

** Occurring in the week preceding that in which the substitution day occurs.

Examples: If we fail to get data for a site on Monday the 8th of January 2007. In accordance with the table we would first try Monday 1 January 2007, and as this is a public holiday, we next try Monday 25 December 2006, as this is a public holiday, we next try Monday 25 December 2006, and as this is a public holiday we finally end up using the data from Monday 18th December 2006 as estimate for Monday the 8th of January 2007.

Similarly if we need data for Friday the 2nd of May 2003, we first try Friday 25 April, ANZAC day, next try Friday 18 April, Good Friday, and finally use Friday 11th April.

Estimation of Data for Gate Point Meters

In relation to estimates for a time interval of the 'Substitution Day' for *gate point metering data*, AEMO is to create an estimate of the *gate point metering data* using the *nomination estimation methodology* as outlined below.

The estimate of the *gate point metering data* is to be created by summing the *profiled pipeline nomination* for relevant *gas day*.

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

B2B Service Order Specifications (WA only)

| Service Order Request Elements – Western Australia | | Meter & Service Connection Request Cluster Development Emergency Change Over | Update Meter and or Service Request | Apply Meter Lock Regular Removal Request Disconnect Service in Street Trailer air Coupling Installation | Remove Meter Lock Regulator Reinstall Request Reconnect Service in Street Trailer air Coupling Removal | Permanent Request | Service Disconnection | Meter Retake and Test | Dissatisfied Customer | Other |
|--|---------------------|--|-------------------------------------|--|---|----------------------|--------------------------|-----------------------|-----------------------|-------|
| Data Elements | General Usage Notes | SCR CLT ECO | UMS | AML* MRM* DSD* TCI* | RML MTN RSD TCR | SDR | MRT | DFC | OTH | |
| LoadDetails/PerAnnum | | OR | OR | NR | NR | NR | NR | NR | NR | |

FRC B2B System Interface Definitions

Transaction Data Elements

| Transaction: | | ServiceOrderRequest |
|----------------------|---|--|
| Received From: | | User |
| Sent To: | | Network Operator |
| Data Element | Vic/SA Mandatory / Optional / Not Required | Usage |
| LoadDetails/PerAnnum | O | In WA required for Job Enquiry Codes " CLT <u>SCR</u> ", "ECO", "CLT", "UMS". In WA Optional for "RML", "MFX", "SCF", "MTN" and "RSD". Otherwise Not Required in SA or WA. |