CDN LSN – Feedback Summary

Participant	Feedback	Comment
APA	Some abbreviations used in the current GMI we don't recognise - may be electricity specific? e.g. MC, MPB.	
	CDR – section 1.1 of the GMI – as well as 'Confirm Life Support', the Reason field includes a number of other allowed values listed, including 'Returned Mail', 'Missing Customer Details', 'No response to rejected CDN', 'Transfer Complete, no CDN Received', 'New Connection, no CDN Received', 'Data Quality Issue' and 'Other'. Is the proposal to use CDR only for confirmation of Life Support customer details? If not, it needs to be made clear as the broader list would pose a much bigger data management question.	
	CDN - T70 is the aseXML B2B transaction. There is currently no RMP obligation to send CDN or to store any data received. As AEMO have noted in their initial feedback to AGLs GMI, the requirement for the retailer to send the CDN is not in the RMPs but in the Distribution Access Arrangements (now in each of the SA, Qld and Vic AGN AA's), in the Supply Curtailment section (see below). The purpose of sharing the customer contact details via the CDN is for Emergency management only.	
	17.5 Network User Information The Network User must give AGN whatever information AGN reasonably requests from time to time to enable AGN to interrupt or curtail deliveries of Gas pursuant to the Agreement. That information may include (but is not limited to) emergency contact details for the Network User (or, if the Network User is a Gas Retailer, the Network User or any Shared Customer)	
	17.6 Updates The Network User must give AGN whatever additional information is necessary from time to time to ensure that all information given to AGN pursuant to sub-clause 17.5 remains true, correct and up to date throughout the Term.	

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	CDN – T70 - Substantial system changes would be required if we had to store customer contact details via a B2B transaction. We would need to change both systems and also interfaces between them. CDN - T71 is the CSV file that is to be delivered as a CD or emailed. This is the 6 monthly update, and we have relied upon this in the past to update customer contact details for emergency purposes.	
AEMO	Change Title	
	#2.1 AEMO preliminary feedback – The VIC, QLD, NSW.ACT and SA Retail Market Procedures don't include any provisions regarding Customer Contact Details. The Technical Protocol however includes provisions about providing CDN under the Distribution Access Arrangements (for VIC and QLD) (or the NERR (for SA). It only includes CDN, not CDR. #2.2 - Query this reference to align with correct ASWG. The ASWG is only a technical work group. The only approve the aseXML schema. They have nothing to do with the actual business process	
	#3 - AEMO preliminary feedback – See #2.1 (re Procedure reference) #4 AEMO prelim feedback: Other than pointing out the obvious that this section needs more than just a sentence, suggest reference LS transactions is removed from the scope of this GMI as LS transactions is part of the IN003-20 (Gas Life Support and adopt R38). This PPC is due to be published in mid Jan.	
	#5.1 AEMO prelim feedback. Noting ref #4 comment that LS transaction not in the scope of this GMI	

Participant	Feedback	Comment
	#5.2 AEMO prelim feedback. - In terms of CDN the gas markets (including WA) doesn't need to take up the latest schema. The aseXML schema that operators today has the CDN transaction (VIC, QLD and SA are on r29), (NSW/AT are on r34) and (WA are on r13) . In terms of CDR the NSW/ACT, VIC, SA and QLD gas markets doesn't need to take up the latest schema. Because CDR only came in at r14 means WA would need to move to at least r14 for the CDR to be operational	
	#6 AEMO prelim feedback. CDR is not used in any gas jurisdiction so this is new. It was first introduced in aseXML schema version r14 as noted in #5.2 feedback. . It will require east coast Retailers and Distributor to modify their system. AEMO would need to add this transaction to the certification responder. One difference to note for NSW/ACT, for r32 Reason element underlying type (RequestReason) became an enumerated list. So long as the values are unchanged the transaction impact is only going to be the transaction version tag element changed to 32 if used	
	#7 AEMO prelim feedback. The CDN in gas is only using the CSV content field (click here to view VIC build pack - see section 4.6) in the transaction rather than the pure XML, according to the notes in the schema file. So, one implementation question that goes along with this. If you are going to implement CDR, then would the change also switch the market from using the CSV field of CDN to be more proper like Electricity? Obviously that is extra work for implementers This proposal needs to substantiate why the gas retail markets would want to move away from a CSV file.	
	#8 AEMO prelim feedback. See ref #4 comment.	
	#9 AEMO prelim feedback. See ref #4 comment	

Participant	Feedback	Comment
	#10 AEMO prelim feedback. These Key to Usage is not the standard used in gas. AEMO recommends using the standard, which is Mandatory/Optional attribute used to indicate whether the data element must or may be present in the transaction. In some cases, the data element Usage column specifies the context in which the data element can be considered mandatory or optional. The other lable is N/R is not required inside the transaction, they are here only due to the fact that some of aseXML transactions defined for electrical industry.	
Red / Lumo	In Participant Build Pack 5 (NSW/ACT), the CustomerDetailsNotification transaction has a Senstive_Load_Flag of "L" for Life Support. We would expect that the "L" will be removed from this transaction will occur if/when CDR/CDN is implemented.	Editorial made
	From a Red and Lumo perspective, while we would support changes towards alignment of processes and procedures between gas and electricity in principle, it will require a large amount of resources to implement. Given this, at this stage Red and Lumo's resources are focused on delivering other projects. We will support this proposed change if implemented in late 2021 or early 2022.	Noted
EnergyAustralia	While EnergyAustralia agrees with the benefits of uplifting CDN/CDR process for gas to mirror the current electricity process, we are unable to support its implementation without an equivalent gas B2B system. Our main concerns are the inability to process gas CDRs as EA does not have an IT solution to support the receipt of these or process market acknowledgements appropriately. The implementation of B2B solution for gas would resolve these issues. EA supports the uplift of CDN/CDR process in conjunction with gas B2B development, but not without it.	Noted
Simply	Notification transactions (supportive): • Supportive of LSN transaction to be added to the Gas markets (VIC, SA, NSW, QLD).	Noted – as the LSN has been removed from this GMI Another GMI will be needed
	• LSN should be allowed to be sent by incoming retailer prior to FRO completion (unlike CDN which can only be triggered on or after FRO completion).	Noted – per Electricity rules

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	• Simply Energy believes that the transaction does not necessarily need to be mirrored with electricity transaction and can be simplified for gas, as per the requirements of the Rules. For e.g., LSEquipment field values may not be accurate/appropriate for Gas fuel.	Noted – although the Rules do not differentiate and there is some equipment which is identical.
	• CDN is already in place for these gas markets and as such, we're supportive for CDN to stay with an exception to WA, for which we propose no change to WA gas schema (although its out of scope for this GMI).	Noted
	Request transactions (not supportive): • To simply and reduce the overall cost of implementation across the industry, Simply Energy believes there is no benefit to pursue the changes suggested in the GMI for two transactions, viz, CDR and LSR.	Noted
	• As a general feedback, Simply Energy is not supportive of CDR transaction to be included in Gas market (across all jurisdictions) as there is no need for it. Gas processes are different to Elec and we do not need to mimic transactions that are not required.	Noted
	• There is no Rules requirement for LSR (as the registered participant owner is supposed to provide life support data to the other party, be it network or retailer) and hence the LSN is the only transaction required in order to comply with the Rules (which is why LSN is bi-directional, i.e. any party can send it to the other party, unlike CDN which is uni-directional).	Noted -although the need for processes to query information is valuable.
	• Current process of sending csv reports from retailers to networks is almost similar to LSN, and there is no 'request' from any network till date, to provide life support notification. As such, LSR is not warranted and it was only introduced in electricity to replace a pre-existing process of 'CDR-ConfirmLifeSupport'.	Noted.
	• Cost of implementing new processes and exceptional handling for CDR and LSR transactions, does not outweigh the benefits. Moreover, these are not required as per the Rules.	Noted, although it is expected that these transactions would be handled in the same manner as electricity transactions, and as such not generate substantial process change.

Participant	Feedback	Comment
Origin	The proposal is good for industry as we closely align these processes to Electricity. Even though LSN/LSR has been requested to be removed from the scope of the GMI, I think it's important to stress the importance/benefits of CDR for gas considering LSN/LSR for gas becomes operational. An additional benefit, it provides Industry with a market transaction solution to confirm/request customer details as opposed to manually requesting and manually "re- sending" CDNs. It is not a formality to retrigger CDNs in bulk. This sometimes can be requested by the network to retailers for the purpose of a whole customer database reconciliation. From a technical point of view regarding the Schema, aligned to AEMO's comments.. And also, having CDN/CDR CSV converted into XML should be considered more as an approach for overall handling of market messages. Can provide more detail on this if needed.	Agree – CDN and LSN are closely related. Agree – Manual processing is begining to consume greater effort. Agree – AGL sees longer term benefit in transactions being aseXML.
MultiNet Gas	Specifications for submission, response and participants of CDN and CDR (as CDR does not currently exist)	
	Key to usage =- AEMO #4 Agree, standard acceptable	Noted
	Reason Code – other Participants Commentary for field values does not solely reflect Gas Distribution requirements for parties involved ie: MPB/MC	Noted – editorial made
	Rec- Sensitive Load Confirmation of what this reason would be used for and terminology, I would expect this be managed inline with proposed Life Support changes IE: LSN/LSR/LSREC	Removed per red/Lumo Comment – information would be contained within the LSN
	CDN Please verify the format of CDN below, this does not reflect existing VIC CDN format.	Align transaction with electricity

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	CDN Current CDN format has 3 fields for Person, is there a reason this has been reduced	Align transaction with electricity
	Sensitive Load Current VIC allows only Y or N, this will need to be updated to LS, S, NA (where not applicable)	Removed per red/Lumo Comment – information would be contained within the LSN
	LSN Data Discussions required for LSN, LSR and inclusion of LS Reconciliation to agree process and transaction format/requirement	Noted – as the LSN has been removed from this GMI Another GMI will be needed
	Reconciliation What would this be used for if the transaction is MIRN specific, the LSN should be used for the adding/updating/decommissioning of Life Support	Updating of customer details.
	Registration Owner The registration owner may not always be the person responsible for the LS, IE: retailer churn. If churn occurs and the DB provides the LSN to the new FRO at successful churn, does the DB then become the registration owner?	Noted – as the LSN has been removed from this GMI Another GMI will be needed
	LSContact Not all customers have an email address available, if it is available it would be great however this cannot be mandatory	Noted – as the LSN has been removed from this GMI Another GMI will be needed
	Preferred Contact If LSContactEmailAddress is not available, this field should be M	Noted – as the LSN has been removed from this GMI Another GMI will be needed
	LSR Discussions required for LSN, LSR and inclusion of LS Reconciliation to agree process and transaction format/requirement	Noted – as the LSN has been removed from this GMI Another GMI will be needed