

IMPACT & IMPLEMENTATION REPORT (IIR)

Summary Section

Issue number	IN003/20		
Impacted jurisdiction(s)	NSW/ACT, QLD, SA, and VIC		
Proponent	Arjun Pathy	Company	AEMO
Affected gas market(s)	Retail	Consultation process (ordinary or expedited)	Ordinary
Industry consultative forum(s) used	GRCF	Date industry consultative forum(s) consultation concluded	Friday, 14 February 2020
Short description of change(s)	Gas life support		
Procedure(s) or documentation impacted	See Attachment B for detailed list of the impacted documents.		
Summary of the change(s)	Adoption of the existing electricity Life Support Notification (LSN) and Life Support Request (LSR) transactions for gas retail markets and the associated aseXML schema uplift to version r38.		
IIR prepared by	Arjun Pathy	Approved by	Michelle Norris
Date IIR published	Monday, 4 May 2020	Date consultation concludes	Monday, 1 June 2020
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CRITICAL EXAMINATION OF PROPOSAL

1. DESCRIPTION OF ISSUE

1.1. NERR and ESC life support changes

In late 2017, the Australian Energy Market Commission (AEMC) introduced more stringent gas life support obligations in National Energy Customer Framework (NECF) jurisdictions. In response, the Information Exchange Committee (IEC), which is the governing body for business-to-business (B2B) procedures in the National Electricity Market (NEM) retail market, decided to adopt two business-to-business (B2B) transactions to facilitate transmission of life support information between NEM participants: LifeSupportNotification (LSN) and LifeSupportRequest (LSR). These were included in the version r38 of the aseXML schema and have been in used by B2B participants in the NEM retail electricity market since 1 February 2019.

At the time of the introduction of the NECF gas retail market life support changes, participants elected to use an email process instead of aseXML transactions for the exchange of gas life support information.

In August 2019, the Essential Services Commission (ESC) announced that they were looking to adopt similar obligations to NECF jurisdictions in Victoria with, an effective date of 1 January 2020. In December 2019, the ESC published a final decision noting an effective date of 1 July 2020, with transitional arrangements applying from 3 February 2020¹.

1.2. Pre-consultation on gas life support options

At a September 2019 Gas Retail Consultative Forum (GRCF) life support workshop, gas retail market participants generally agreed that, with Victoria's adoption of a similar regulatory framework to NECF jurisdictions, the exchange of life support information via e-mail processes would become more challenging (especially given the significantly larger customer base in Victoria). Participants indicated that continuing with an email approach would render the auditing of life support information exchange difficult and would increase the risk of compliance breaches or wrongful disconnection of life support customers. As such, gas retail market participants indicated that the electricity LSN and LSR transactions could present a more efficient approach to exchanging life support information and to fulfilling their regulatory obligations in a timely fashion.

As part of the GRCF's ongoing investigations into gas life support, AEMO conducted a survey of gas life support participants² to determine whether there was support for the adoption of the electricity LSN and LSR transactions and, if so, when.

The GRCF expressed near-unanimous support in this survey for adoption of the electricity B2B transactions. Most participants preferred to avoid the Q2 2021 window for implementation. The survey also revealed that participants supported the continued use of email processes to exchange life support information until the end of 2021.

The GRCF discussed the survey findings at the September 2020 GRCF meeting, where participants³:

¹ Essential Services Commission, *Strengthening protections for life support customers – final decision*, 5 December 2019, [link](#)

² See Ref #9 in this meeting pack here: https://www.aemo.com.au/-/media/Files/Stakeholder_Consultation/Working_Groups/Retail_Meetings/GRCF/2019/GRCF-Meeting-131---17-September-2019---Meeting-Pack.zip

³ https://aemo.com.au/-/media/files/stakeholder_consultation/working_groups/retail_meetings/grcf/2019/grcf-meeting-131---17-september-2019---meeting-minutes.pdf



- Supported AEMO's assessment that there is a potential net benefit to industry if the existing bilateral (email) processes for gas life support were replaced by two electricity B2B life support transactions.
- Requested that AEMO provide advice on AEMO's capability, costs, and preference to implement a schema change in the period Q4 2020 – Q4 2021 (inclusive).
- Requested that AEMO commence a consultation in 2020 on the required changes to the Technical Protocols⁴ (TPs).

1.3. Proposed Procedure Change (PPC) and supplementary questionnaire

AEMO issued a PPC to implement the gas life support changes on 17 January 2020. Following the conclusion of the PPC consultation, AEMO determined that it did not have sufficient information to conclude whether the proposed change satisfied the National Gas Objective as per rule 135EB(1)(b)(i) of the National Gas Rules (NGR).

As such, AEMO issued a Notice of Time Limit Extension and a supplementary questionnaire on 5 March 2020. The results of the PPC consultation and of the supplementary questionnaire are provided in Section 10 and in Attachments E through G.

2. REFERENCE DOCUMENTATION

2.1. Electricity B2B Procedure: Customer and Site Details Notification Process (final decision)

Click [here](#) to view the electricity B2B Procedure: Customer and Site Details Notification Process.

2.2. Technical Protocol (TP) documentation

Attachment B provides a detailed summary of the changes to each of the TP documents.

2.3. Schema Release documentations

Click [here](#) to view the index of Schema Releases from r28 to r38 inclusive.

3. OVERVIEW OF CHANGES

In order to align the gas life support solution with the life support solution implemented for electricity in February 2019, AEMO has used the LSN and LSR transaction information as described in Sections 5.5 and 5.6 of the (electricity) B2B Procedure: Customer and Site Details Notification Process⁵ as the baseline to prepare the TP.

4. LIKELY IMPLEMENTATION EFFECTS AND REQUIREMENTS

All gas retailers and distributors will need to make IT system changes, which will include incorporating the new LS transactions into gas retail market systems and modifying gas gateways to send and receive r38⁶ transactions (see Section 4 of the PPC for further information on IT system requirements).

⁴ Includes the Gas Interface Protocols that applies in VIC, QLD, and NSW/ACT as well as the AEMO Specification Pack that applies in SA.

⁵ https://aemo.com.au/-/media/files/electricity/nem/retail_and_metering/b2b/2020/b2b-procedure-customer-and-site-details-notification-process-v33.pdf?la=en

⁶ AEMO is aware that several potential schema changes are emerging that may target an implementation date in the period leading up to Q4 2021. However, AEMO notes that the adoption of schema version r38 fully meets requirements for this consultation; namely, it provides LSN and LSR transactions for gas retail market participants to exchange life support information. Any uplift past



The changes that AEMO will need to make include:

- The modification of the pre-production/certification environment responders to support r38 transactions.
- The modification of gas gateways to support sending and receiving r38 transactions.
- The modifications of the aseXML schema transformation engine for Wagga Wagga and Tamworth network to support sending and receiving r38 transactions⁷.
- Modification to the NSW Low Volume Interface (LVI), so that the system can validate, send, and receive transactions in schema version r38⁸.

As mentioned in Section 1 of this IIR, a change of this nature will mean that all gas retailers and distributors that operate in NECF jurisdictions and in Victoria (that is, all AEMO gas retail jurisdictions except Western Australia) must migrate to schema version r38 concurrently. AEMO will therefore undertake a co-ordinated release program, which will include recertifying any modified transactions.

AEMO proposes a number of amendments to TP documents for IT systems changes needed to adopt the gas LSN and LSR transaction and uplift the aseXML schema version to r38. A summary of the proposed TP amendments is presented in Attachment B.

5. OVERALL COSTS AND BENEFITS

The estimated cost for AEMO to implement this change is \$450,000⁹. This estimate includes the cost of implementing IT system changes as described in section 4 and the cost of drafting and consulting on TP documentation changes as described in section 9. There is no direct benefit for AEMO.

AEMO sought feedback from industry on the net costs and benefits of the proposed changes in submissions both to the PPC and to the supplementary questionnaire. Industry participants provided these figures in confidence. In aggregate, the feedback indicated a moderate-to-substantial net financial benefit from implementing the change, with between a three- and a seven-year payback period across industry as a whole.

Survey responses indicated that there were substantial benefits for all distributors, and moderate-to-substantial benefits for most retailers. This net financial benefit is in line with the value rating score provided by participants, for which the overall average score indicated a moderate positive outcome if the proposal were to proceed (see Figure 1). The above analysis reflects only the immediate financial impacts on gas retail market participants and does not include the benefits that the change provides in terms of certainty for and protection of vulnerable gas life support customers.

In addition to the net financial benefit to industry, respondents to the PPC and supplementary questionnaire noted a number of other benefits to both distributors and retailers resulting from the change, including:

- Certainty in life support information that is sent to and received from a distributor.

r38 to subsequent schema versions will be consulted on separately to ensure that any uplift to the subsequent schema version will be beneficial and that those benefits will outweigh any costs. The GRCF confirmed that it was comfortable with this approach at its 18 February 2020 meeting; please see minutes that were distributed to the GRCF via email.

⁷ The PPC had included the deactivation of the aseXML schema transformation engine; however, as noted in Ref #69 in Attachment F, AEMO has decided that aseXML schema transformation engine need to be retained but modified to support the sending and receiving r38 transactions.

⁸ This change was not included as part of the PPC. AEMO uncovered the need to make this change as part of its investigations in preparation for issuing the IIR.

⁹ This figure is an increase on the estimated costs given in the PPC (the estimated cost at that time was \$250,000). As part of its investigations for the IIR, AEMO uncovered additional work that it will need to perform to make the requisite changes to accommodate the changes proposed in this IIR. AEMO will continue to refine costs as necessary and will notify the GRCF if they change again.



- Inherent traceability in each LSN provided to a distributor.
- Speed of transaction process as compared with manual processes (especially in light of the one-business-day information provision requirement in Victoria).
- Ensuring that retailers and distributors are able to meet their regulatory obligations.
- Limit on risk of wrongful disconnection of gas life support customers.
- Avoidance of the errors involved in manual data entry of gas life support information.
- Avoidance of privacy issues from using email processes (improved information security from using a standard industry B2B transaction).
- Capacity to handle larger transaction volumes, given the increasing gas life support customer numbers in SA, QLD, and VIC.
- Harmonisation between gas and electricity life support processes.

A full description of the benefits identified by respondents can be found in Section 2 of Attachment G.

In across the PPC and supplementary questionnaire, all participant indicated that the change would represent a net benefit to their organisation except for Origin Energy, Powershop, and Simply Energy. Origin Energy has assessed the change as a net cost, noting that “the change is expected to not deliver additional monetary benefits from FTE [full-time equivalent] savings to [their] organisation as the existing CSV process is an automated process”¹⁰. Simply Energy has assessed the change as neither a net benefit nor a net cost given the potential use case issues associated with incorporating the LSR transaction. However, Simply Energy has also agreed that the implementation of the LSR transaction itself does not present an issue and that its objections pertain to use cases for the transactions, which fall outside this consultation and therefore do not have a bearing on whether the changes proposed in this IIR meet the National Gas Objective¹¹. Powershop expressed two contradictory positions on gas life support between the PPC and the supplementary questionnaire: they supported the change at the PPC stage since they “do see benefits from a technical perspective in securely and consistently managing life support transactions for both electricity and gas”, while they opposed the change at the supplementary questionnaire stage. AEMO notes that there were no changes in technical requirements or information presented between the PPC and supplementary questionnaire stages. Powershop did not provide a reason for its changed position. AEMO’s response to these concerns is provided more fully in Attachments E and G.

Based on the industry feedback, AEMO sees the costs and benefits as follows:

- All gas distributors have expressed strong support for the change, noting that it represents a net benefit for their organisation.
- All retailers, with the exception of Powershop, Origin Energy and Simply Energy, expressed at least moderate support for the proposed life support B2B change, and all with the exception of Origin Energy and Powershop have expressed a position that the change does not represent a net cost. As previously noted, Powershop put forward different positions (initially stating that the change did represent a net benefit (PPC response) whilst subsequently stating that the change did not represent a net benefit (PPC supplementary questionnaire)).
- On balance, given the feedback provided to AEMO, AEMO believes that the substantial net benefits indicated by all distributors and moderate net benefits indicated by most retailers will provide a net benefit position for the sector.

In addition, AEMO believes that the adoption of consistent B2B transactions will harmonise gas and electricity life support process and facilitate gas market participants’ fulfilling their regulatory obligations

¹⁰ See Ref #10 in Attachment D.

¹¹ See Ref #10 in Attachment B and the minutes for GRFC Meeting 134 – 18 February 2020.



for all east coast regulatory regimes. Importantly, vulnerable life support customers will be supported through this standardised sectoral approach.

Taking into account the consumer-specific benefits (e.g. minimised risk of wrongful disconnection, minimised privacy concerns), AEMO believes that the benefits across industry satisfactorily outweigh the costs.

Taking into account all of the findings described in this section, AEMO believes the adoption of LSN and LSR meets the National Gas Objective.

6. MAGNITUDE OF THE CHANGES

AEMO has deemed this change to material because of the change to IT systems and because of the industry coordination effort required to uplift the aseXML schema to schema version r38.

7. AEMO'S PRELIMINARY ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH SECTION 135EB:

As part of the PPC consultation, AEMO put forward the following assessment regarding compliance with section 135EB of the National Gas Rules:

Consistency with National Gas Law (NGL) and NGR	AEMO's view is that the proposed change is consistent with the NGL and NGR. AEMO also believes that this change is consistent with Part 7 of the National Energy Retail Rules (NERR), Part 7 of the Victorian Energy Retail Code, and section 4A of the Victorian Gas Distribution System Code. No participant raised any objections during the PPC consultation to the proposal's consistency with any of these documents.
National Gas Objective	As outlined in Section 5, it is AEMO's view that this change would facilitate efficient operation of the retail gas market by providing a cost-effective solution allowing retailers and distributors to fulfil their life support regulatory obligations in a timely fashion.
Any applicable access arrangements	AEMO's view is that the proposed change is not in conflict with existing Access Arrangements. No participant raised any objections during the PPC consultation to the proposal's consistency with any existing Access Arrangements.

8. CONSULTATION FORUM OUTCOMES

On 17 January 2020, AEMO published on its website the PPC and the proposed documentation changes for the adoption of the LSN and LSR transactions. Registered participants and interested stakeholders were invited to make submissions to the PPC consultation, with responses closing on Friday 14 February 2020. AEMO received 11 responses: seven from retailers and four from distributors¹². Ten of these responses

¹² The retailer responses were from: AGL, GloBird Energy, Momentum Energy, Origin Energy, Powershop, Red and Lumo Energy, and Simply Energy. The distributor responses were from: Australian Gas Networks, AusNet Services, Jemena, and Multinet Gas Networks.



supported the proposal subject to some minor changes to the Technical Protocols¹³, and one response opposed the changes. A full summary of all participant feedback and AEMO's response to each item is provided in Attachments E and F.

AEMO determined on the basis of these submissions that it had insufficient information to determine whether the proposed change met the National Gas Objective. On that basis AEMO issued a Notice of Time Limit Extension and a supplementary questionnaire on 5 March 2020.

AEMO received 12 responses to the supplementary questionnaire: eight from retailers and four from distributors¹⁴. A full summary of all participant responses to the supplementary questionnaire is provided in Attachment G.

¹³ Simply Energy's response did not originally support the introduction of the LSR transaction; however, it was clarified at the 18 February 2020 GRCF meeting that Simply Energy's objections related entirely to the use of the LSR transaction and not to the adoption of the LSR transaction itself. As such, Simply Energy agreed to the incorporation of LSR as part of the IN003/20 consultation with the understanding that the GRCF would resolve any issues relating to LSR use cases between the conclusion of the IN003/20 consultation and the effective date of the LSN / LSR introduction.

¹⁴ The retailer responses were from: ActewAGL, AGL, Alinta Energy, EnergyAustralia, Momentum Energy, Origin Energy, Powershop, and Simply Energy. The distributor responses were from: Australian Gas Networks, AusNet Services, Jemena, and Multinet Gas Networks.



IMPACT & IMPLEMENTATION REPORT – RECOMMENDATION(S)

9. SHOULD THE PROPOSED PROCEDURES BE MADE?

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

10. PROPOSED TIMELINES

Subject to all necessary approvals, AEMO will implement the changes described in this IIR targeted to take effect sometime between Q4 (Oct-Dec) 2021 and Q2 (Mar-Jun) 2022. In order to achieve this timeline, AEMO proposes the following key milestones:

- IIR issued on Monday 4 May 2020.
- Submissions on IIR close Monday 1 June 2020.
- AEMO decision in late June.

The publishing of the notice of effective date is targeted for Q3 (Jul-Sept) 2021¹⁵.

¹⁵ This date has been chosen to allow time for any additional changes to be incorporated in a aseXML schema uplift beyond r38. Consultation on those additional changes must have commenced by 1 June 2020 to be considered as part of the Q4 2021 implementation date



ATTACHMENT A – IIR RESPONSE TEMPLATE

The IIR 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 proposed changes.
- Section 2 seeks feedback on the marked-up changes to the TP described in Attachments C.

Anyone wishing to make a submission to this IIR consultation are to use this response template. Submissions close 1 June 2020 and should be emailed to grcf@aemo.com.au.



ATTACHMENT B – TECHNICAL PROTOCOL REFERENCE DOCUMENTATION (SEE SECTION 2)

The following table lists Technical Protocol (TP) documents that need to be amended. The table also provides a summary of the changes between the procedures proposed in this IIR and the current published version of the TP documents, as well as between the procedures proposed in this IIR and the procedures proposed in the PPC. Attachment C contains a draft version of the TP showing tracked changes between the current published version and the changes proposed in this IIR.

Ref#	Title of document and any notes.	Current Ver #	Summary of the changes between proposed procedures and the current published version	Changes from PPC
Victoria				
1	<p>Participant Build Pack 1 - Table of Transactions, Table of Elements, List of Job Enquiry Codes, Address Elements and MIRN and Meter states.</p> <p>Marked up showing differences between current version.</p>	3.5	<p>1. Add the LS transactions (80, 81, 82 and 83) to the Process Flow Table tab.</p>	<p>1. Clarificatory comments have been added to T80 and T82 (see Ref #33 in Attachment F)</p> <p>2. LS B2B elements have been added to Elements tab of the worksheet (see Ref #34)</p>
2	<p>Participant Build Pack 3 - Interface Definitions</p> <p>Marked up showing differences between current version.</p>	3.6	<p>1. Add a new section (4.7 – Life Support Information) that contains:</p> <ul style="list-style-type: none"> • A general overview explaining the purpose of the transactions. • The specific fields within the transactions. • Details of when a field is required. <p>2. Update Appendix A (Data Dictionary) to include the new LS aseXML element names.</p>	<p>1. Removes “Explicit Informed” before “Consent” in the LSContactEmailAddress field, since this is not an Explicit Informed Consent requirement under the NERR (see Ref #49)</p> <p>2. Adds the words “establishes or” to the Definition Table trigger cell in section 4.7.2 (see Ref #47 in Attachment F).</p> <p>3. Replaces “Life Support Notification” and “Life Support Request” with “LifeSupportNotification” and “LifeSupportRequest” respectively in</p>



Ref#	Title of document and any notes.	Current Ver #	Summary of the changes between proposed procedures and the current published version	Changes from PPC
				<p>Transaction Definition Table (see Ref #48).</p> <ol style="list-style-type: none"> “NMI” changed to “MIRN” in 4.7.3(e) aseXML samples added (see Ref #53) Updated technical appendices (see Ref #55, #56) Updated scope table (see Ref #57) Remove the one-business-day reference from clause 2.7.2 (e) (see Ref #62A)
3	<p>Gas Interface Protocol – Victoria</p> <p>Marked up showing differences between current version.</p>	21.0	<ol style="list-style-type: none"> Update the version number for the changed artefacts mentioned above. Update the aseXML schema version to r38, to which participants will subscribe for Victorian gas retail market systems. 	
Queensland				
4	<p>Gas Interface Protocol – QLD</p> <p>Marked up showing differences between current version</p>	20.0	<ol style="list-style-type: none"> Update the version number for the changed artefacts mentioned above. Update the aseXML schema version to r38, to which participants will subscribe for Queensland gas retail market systems. 	<ol style="list-style-type: none"> Version release comments added (see Ref #65).
NSW/ACT				
5	<p>NSW/ACT specific Participant Build Pack 5</p> <p>Marked up showing differences between current version</p>	5.0	<ol style="list-style-type: none"> Update section 3 (Transaction Changes) to include LSN and LSR transactions (80, 81, 82 and 83). The update includes that they are flagged as “No change” (NC), meaning that technical details within the Victorian Participant Build Pack applies for life support. 	



Ref#	Title of document and any notes.	Current Ver #	Summary of the changes between proposed procedures and the current published version	Changes from PPC
6	NSW/ACT Wagga Wagga and Tamworth specific Participant Build Pack 6 Marked up showing differences between current version	3.0	1. Update section 2 and other relevant sections.	1. Deleted sentence in section 2.1 reinstated (i.e. AEMO has withdrawn the proposal to remove the transformation engine)
7	Gas Interface Protocol – NSW/ACT Marked up showing differences between current version	9.0	1. Update the version number for the changed artefacts mentioned above. 2. Update the aseXML schema version to r38, to which participants will subscribe for NSW/ACT gas retail market systems.	
South Australia				
8	AEMO Specification Pack - FRC B2B System Interface Definitions Marked up showing differences between current version	4.6	1. Add a new section (4.7 – Life Support Information) that contains: <ul style="list-style-type: none"> • General overview explaining the purpose of the transaction. • The specific fields within the transactions. • Details of when a field is required. 2. Update Appendix A (Data Dictionary) to include the new life support aseXML element names	1. See changes for Participant Build Pack 3
9	AEMO Specification Pack- Specification Pack Usage Guidelines	8.1	1. Update the version number for the changed artefacts mentioned above. 2. Update the aseXML schema version to r38, to which participants will subscribe for SA gas retail market systems.	



Ref#	Title of document and any notes.	Current Ver #	Summary of the changes between proposed procedures and the current published version	Changes from PPC
	Marked up showing differences between current version			



ATTACHMENT C – DOCUMENTATION CHANGES (SEE SECTION 3)

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



ATTACHMENT D – 2011/2012 ASEXML RELEASE DOCUMENTATION

The following, which are attached separately to this document, are reference documents that formed part of the 2011/2012 aseXML release:

- Industry workshop presentation slides.
- aseXML manifest.
- Testing scope.
- Working group terms of reference.
- Implementation Plan.

Participants should review these reference documents as a guide to assess the overall impact of this change.

ATTACHMENT E – GENERAL FEEDBACK GIVEN TO PPC

Section 1 - Comments on the technical requirements and implementation date

Topic	Ref #	Company	Response	AEMO Response
Provide details on whether your organisation agrees with the technical requirements and implementation date options that AEMO has put forward in Section 3 of this PPC. If your organisation does not believe that the PPC adequately captures the technical requirements or does not support the proposed implementation date options, please provide details on which requirements specifically your organisation opposes and why.	1	AGL	<p>A detailed technical assessment has not been conducted for this proposed change, but AGL is supportive of this change and associated changes being brought together into a coordinated release.</p> <p>The proposed timing of late 2021 is the most appropriate timing, given the other industry changes currently underway.</p>	<p>AEMO notes AGL’s support for the proposed changes.</p> <p>AEMO notes AGL’s support for the proposed Q4 2021 implementation date.</p>
	2	Australian Gas Networks	<p>AGN agrees with the technical requirements, notwithstanding some comments and questions in the specific feedback below.</p> <p>AGN supports a Q4 2021 implementation date. We must stress however that <u>all</u> jurisdictions must be switched to R38 simultaneously on a common date. Our national systems cannot manage a staged switch over as it can only operate on a single schema.</p> <p>With regard to the SA/NSW transformation engine as noted by AEMO in PBP6, our planned scope of work <u>only</u> includes the generic Schema</p>	<p>AEMO notes AGN’s agreement with the technical requirements, notwithstanding the below comments.</p> <p>AEMO notes that all jurisdictions will move to schema version r38 on the same date.</p> <p>In line with AGN’s comments, AEMO has withdrawn the proposed deactivation of the aseXML schema transformation engine from the changes proposed in this IIR.</p>



Topic	Ref #	Company	Response	AEMO Response
			<p>Version related transactions. Any transactions requiring Transaction Specific Transforms (not schema version related) are <u>not</u> in our planned scope of work, and the AEMO transformation process will need to continue to cater for these.</p> <p>APA only agreed to participate in the NARGP process on the basis that it could use existing SA transactions for the Wagga and Tamworth networks.</p>	
	3	AusNet Services	<p>AusNet Services supports a Q4 2021 implementation date for LSN and LSR transactions, and associated schema updates. The implementation would be considerably complex and require significant industry resources to progress. With the recently published gas life support obligations in Victoria coming into effect we would ideally require these changes by July, however the resources required to make system implementation would not be available until much later. Therefore, we support the Q4 2021 implementation date.</p>	<p>AEMO notes AusNet Services' support for the proposed Q4 2021 implementation date.</p>
	4	Jemena Gas Networks	<p>Jemena Gas Network (JGN) supports the proposed changes as outlined in this PPC.</p>	<p>AEMO notes Jemena Gas Networks' support for the proposed changes.</p>



Topic	Ref #	Company	Response	AEMO Response
			There are currently over 4000 registered gas life support customers in NSW and the ACT. JGN is supportive of aligning gas and electricity life support processes. From our experiencing in operating under both frameworks, we believe the automated LSN/LSR process for electricity is more efficient than the existing bilateral process for gas which relies on email, is manually intensive and adds risk for both retailers and distributors.	
	5	Momentum Energy	Momentum Energy supports the implementation date and technical requirements that AEMO has put forward for this PPC.	AEMO notes Momentum Energy's support for the proposed changes. AEMO notes Momentum Energy's support for the Q4 2021 proposed implementation date.
	6	Multinet Gas Networks	Multinet Gas Networks Agrees with the technical requirements and proposed implementation date	AEMO notes Multinet Gas Networks' agreement with the technical requirements as outlined in the PPC. AEMO notes Multinet Gas Networks' support for the Q4 2021 proposed implementation date.
	7	Origin Energy	Origin appreciates the approach undertaken by AEMO to develop a suite of initiative changes that may be bundled into a single aseXML uplift. This makes the Q4 2021 implementation date the preferred option as opposed to Q4 2020. Given the complexity and cost associated with such a change, it is an imperative part of the consultation process that the net benefits	AEMO notes that Origin Energy no longer believes the changes will provide any benefit to their organisation.



Topic	Ref #	Company	Response	AEMO Response
			<p>outweigh the costs in order to proceed with industry change.</p> <p>With the evolving development of the Life Support user guide and adoption of this process matures between participants, Origin believes the current process is fit for purpose.</p>	
	8	Powershop Australia	<p>Powershop agrees with the high-level technical requirements detailed in section 3.</p> <p>Powershop agrees with a Q4 2021 implementation date, but suggests that a Q2 2022 implementation might be more beneficial to allow for the five minute settlement change to be settled in the market.</p>	<p>AEMO notes Powershop Australia' agreement with the high-level technical requirements as outlined in section 3.</p> <p>AEMO notes Powershop Australia' agreement with the Q4 2021 proposed implementation date.</p>
	9	Red and Lumo Energy	<p>Red Energy and Lumo Energy agree with the technical requirements, and support an implementation date of Q4 2021 - as well as the associated aseXML schema uplift to version r38.</p>	<p>AEMO notes Red and Lumo Energy's agreement with the technical requirements.</p> <p>AEMO notes Red and Lumo Energy's support for the Q4 2021 proposed implementation date.</p>
	10	Simply Energy	<p>Simply Energy broadly agrees with the proposal for the following two items:</p> <ul style="list-style-type: none"> - Implementation in Q4 2021, after 5ms go-live. - Supportive of LSN transaction to be added to the Gas markets (VIC, SA, NSW, QLD). - LSN should be allowed to be sent by incoming retailer prior to FRO completion 	<p>Regarding the Q4 2021 implementation date and the introduction of the LSN transaction, AEMO notes Simply Energy's support.</p> <p>Regarding the introduction of the LSR transaction, AEMO notes the outcome of the IN003/20 discussion on this matter at the 18 February 2020 GRFC meeting, in</p>



Topic	Ref #	Company	Response	AEMO Response
			<p>(unlike CDN which can only be triggered on or after FRO completion).</p> <ul style="list-style-type: none"> - 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. However, Simply Energy is comfortable with the suggested LSN transaction structure (additional comments are provided in relevant sections below). <p>On the contrary, Simply Energy is <u>not supportive of request transaction</u>:</p> <ul style="list-style-type: none"> - To simplify and reduce the overall cost of implementation across the industry, Simply Energy believes there is no benefit to pursue the changes suggested in the PPC for LSR (LifeSupportRequest) - There is no requirement for LSR (as the registered participant owner is supposed to provide life support data to the other party, be it network or retailer) - 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, only retailer initiated and hence it requires a request mechanism, CDR). 	<p>which Simply Energy and all other parties agreed that the implementation of the LSR transaction in IT systems was not the issue so much as the use case of the LSR transaction¹⁶. Since the use cases of the LSR are not relevant to the Technical Protocol changes proposed in this IIR and can be resolved following this consultation by agreements between participants, AEMO considers that Simply Energy's concerns can be resolved outside this consultation and therefore do not have a bearing on whether the proposed changes meet the National Gas Objective.</p>

¹⁶ Please refer to the draft minutes for GRCF Meeting 134 – 18 February 2020, distributed to the GRCF via email.



Topic	Ref #	Company	Response	AEMO Response
			<ul style="list-style-type: none">- 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 '<i>CDR-ConfirmLifeSupport</i>', which never existed in Gas and neither should be.- Cost of implementing new processes and exceptional handling for LSR transaction, does not outweigh the benefits as networks use LSR for various use-cases which makes it quite a vague transaction and this is highly debated in the electricity forums.	



Section 2 – Comments on the whether a net benefit will be realised should this initiative be implemented.

Topic	Ref #	Company	Response	AEMO Response
Provide feedback on whether you expect that the benefits described in section 4 will outweigh the costs described in section 6 for your organisation. Feedback should include details of the benefits, and if your organisation believes that the cost will outweigh the benefits, your feedback should provide an order of materiality for the costs.	11	AGL	<p>AGL supports the proposal and sees benefit in standardising the industry processes and mechanisms used between retailers and distributors for the provision of Life Support information.</p> <p>Note: Specific costing has yet to be done as this would change with other changes implemented – eg CDN/CDR.</p> <p>Overall benefits:</p> <ul style="list-style-type: none"> • Certainty in LS information being sent to and received by a DB; • Inherent traceability in each LSN provided to a gas DB; • Speed of transaction process (noting the Victorian 1 b/day timeframe to provide that information); • Ensures retailers and distributors meet their regulatory obligations. 	AEMO notes the benefits that AGL has provided.
	12	Australian Gas Networks	<p><u>Costs:</u></p> <p>A high level estimate of LSN and LSR implementation costs is [REDACTED]. Multiple systems will be impacted.</p> <p><u>Benefits:</u></p> <p><u>Risk Avoidance / Compliance Issues</u></p>	AEMO notes the benefits that Australian Gas Networks has provided and that the changes will realise a net benefit for Australian Gas Networks over time.

Topic	Ref #	Company	Response	AEMO Response
			<ul style="list-style-type: none"> • A B2B solution for life support will limit the risk of process errors that could result in the disconnection of gas supply for a life support customer. The risk to reputation and of potential fines for regulatory breaches will be minimised. • The current email based manual life support process is prone to errors due to inconsistent CSV file formats requiring manual system upload. • There are potential privacy issues when dealing via email with the current process. Both Retailer and DB must ensure all communication is password protected. • Volumes are increasing – experience in SA/Qld markets in the first year and Victoria commencing. With increase in volume, risk increases. <p><u>Cost Avoidance – FTEs</u></p> <ul style="list-style-type: none"> • With the increase of LS registration in 2019 for SA/QLD and introduction of Victoria recently, management of the manual life support process now requires [REDACTED]. We anticipate that if the volume of registration continue to increases (particularly with Vic implementation recently) we may require [REDACTED] to manage the process. This will equate to approx. [REDACTED] per annum, that will be saved with the B2B solution. 	



Topic	Ref #	Company	Response	AEMO Response
			<p><u>Net Position:</u></p> <p>Ultimately the implementation costs will be outweighed by the cost savings over time.</p>	
	13	AusNet Services	<p>With the introduction of life support obligations for gas customers in Victoria gas network businesses need better and more contact details to provide our gas life support customers with the better protections and notifications for supply interruptions.</p> <p>Despite what AEMO incorrectly submitted to the ESC Victoria that all businesses have work-around arrangements for life support, without this information gas network businesses will struggle to meet our new regulatory obligations without the LSN and LSR transaction. Emailing of customers sensitive life support details will not ultimately comply our IT security requirements and is not auditable enough without very significant IT and process changes.</p> <p>In electricity the introduction of LSN and LSR transactions have been essential in dealing with the higher volumes of life support transactions received since the NERR changes were implemented. We expect high transaction volumes as national retailers are likely to disregard their obligations in Victoria to ask customers the nature of their life support equipment needs in the first instance to determine if the customer needs registration for electricity, gas or dual fuel.</p>	<p>AEMO notes that the information provided in its submission to the ESC were based on comments provided by participants at a September 2019 GRCF workshop at which AusNet Services was present.</p> <p>AEMO notes the benefits that AusNet Services has provided and that the changes will realise a net benefit for AusNet Services over time.</p>



Topic	Ref #	Company	Response	AEMO Response
	14	Jemena Gas Networks	<p>JGN believes the proposed changes will result in net long-term benefits for retailers and distributors. These benefits include:</p> <ul style="list-style-type: none"> • harmonisation between gas and electricity life support processes • efficiency gains using automated B2B communications between retailers and DNSPs • reduced risk and reliance on email and manually-intensive processes 	AEMO notes the benefits that Jemena Gas Networks has provided and that the changes will realise a net benefit for Jemena Gas Networks over time.
	15	Momentum Energy	Momentum Energy believes that the risk of error will be reduced significantly and appropriately with this solution, meaning vulnerable Australians will be safer. We agree that the benefits outweigh the cost.	AEMO notes the benefits that Momentum Energy has provided and that the changes will realise a net benefit for Momentum Energy over time.
	16	Multinet Gas Networks	<p>MGN believes that the benefits will out way the costs as this change will move our existing business processes from manual processing to an automated solution.</p> <p>Whilst costs from the outset will not immediately display benefits, these costs will be absorbed by MGN and a financial benefit seen over time following the implementation of the automation.</p> <p>With emphasis from the Australian regulators to ensure compliance to this process we believe that automation is pivotal in maintaining our data records accurately and in a timely manner.</p>	AEMO notes the benefits that Multinet Gas Networks has provided and that the changes will realise a net benefit for Multinet Gas Networks over time.



Topic	Ref #	Company	Response	AEMO Response
	17	Origin Energy	<p>This change has been rated as complex.</p> <p>Origin acknowledges the benefits of B2B transactions improves auditability and some efficiencies gained from the manual handling of CSV files and associated reconciliation activities. Taking into consideration current and expected volumes of gas life support transactions, costs to implement the proposed changes will exceed the benefits.</p>	AEMO notes that the costs will exceed the benefits for Origin Energy.
	18	Powershop Australia	<p>Powershop do see benefits from a technical perspective in securely and consistently managing life support transactions for both electricity and gas.</p>	AEMO notes the benefits that Powershop Australia has provided. AEMO further notes that Powershop Australia's feedback here directly contradicts its later feedback to the supplementary questionnaire, despite the fact that AEMO issued no additional information or technical documentation between the issuance of the PPC and the supplementary questionnaire.
	19	Red and Lumo Energy	<p>Yes, we consider that the benefits of this change will outweigh the costs of implementing, when the risks of life support non-compliance are taken into account.</p>	AEMO notes the benefits that Red and Lumo Energy have provided and that the changes will realise a net benefit for Red and Lumo Energy over time.
	20	Simply Energy	<p>Simply Energy believes that there are tangible (process improvement/efficiency based) and intangible (risk based) benefits of introducing LSN transaction because:</p>	See AEMO's response to Ref 10 in Section 1 of Attachment B. In light of the discussion at the 18 February 2020 GRCF meeting, AEMO considers that the matters raised by Simply Energy relate to



Topic	Ref #	Company	Response	AEMO Response
			<ul style="list-style-type: none">the current process of sending csv extract is manual and labour intensivethe current process is not real-time and poses a risk on compliance (potential breach situations)cost of implementing LSN does not materially impact the operational processes because of its alignment with electricity and its ability to be integrated in automated workflows with little manual intervention, only when an exception arises. <p>However, Simply Energy considers LSR to be a 'cost-only' transaction with no material benefit to the industry participants. LSR implementation includes exception management and because each LSR creates a manual work at the recipient's end, it decreases process efficiency and does not align with the intent of the Rule, i.e. if any party has knowledge of Life Support, it should notify the other party by using an LSN, regardless of whether that party is a registered participant owner.</p>	use cases for LSR and therefore fall outside the scope of this consultation and therefore do not have bearing on whether the proposed changes meet the National Gas Objective.



Topic	Ref #	Company	Response	AEMO Response
<p>Sections 1 to 9 of the PPC sets out details of the proposal.</p> <p>Does your organisation support AEMO’s assessment of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO’s assessment (include PPC section reference number) of the proposal and include information supporting your organisation’s rationale as to why you do not support AEMO’s assessment.</p>	21	AGL	<p>Note that AGL believes that this change is also applicable to Victoria, and notes that the documentation should refer to NECF and VESC jurisdictions (section 3).</p> <p>AGL notes that the Life Support transactions only cover the specific Life Support information and that other information associated with the Customer Account holder are detailed within the Customer Details Notification, which is not covered in this GMI.</p> <p>The specific schema which the gas industry moves to may be higher than r38. AGL would suggest that as all parties are implementing a higher schema, that the latest available be implemented in this process (section 4.2.1).</p> <p>This change also supports the revised obligations in Victoria, which are covered by the Victorian Gas Distribution Code and Victorian Energy retail Code (Section 7).</p>	<p>AEMO notes AGL’s comments regarding Section 3 (Overview of Changes) and have changed the relevant phrase to read “in NECF jurisdictions and in Victoria” for this IIR.</p> <p>AEMO notes AGL’s comments regarding the CustomerDetailsNotification, which will be addressed in the consultation that addresses the CustomerDetailsNotification transaction.</p> <p>Regarding the move to r38 or a schema version higher than r38, AEMO notes the outcome of the discussion at the 18 February 2020 GRCF meeting, at which the GRCF agreed that this change would only consider uplifting to schema version r38 (as that was what had been costed in section 5 by AEMO’s IT division) but that this would not “hardcode” r38 into the Technical Protocols—i.e. participants would be welcome to request an additional move to later schema versions following consultation IN003/20 and AEMO would determine the incremental cost to move to a later schema version.</p>
	22	Australian Gas Networks	AGN generally supports AEMO’s assessment.	AEMO notes Australian Gas Networks’ support of AEMO’s assessment.



Topic	Ref #	Company	Response	AEMO Response
	23	AusNet Services	AusNet Services supports the proposal in all areas.	AEMO notes AusNet Services' support of AEMO's proposal.
	24	GloBird Energy	Globird is generally supportive of having all states on the same XML version, but given this does involve systems upgrade, the further away this can be from the 5 min settlement due date the better.	AEMO notes GloBird Energy's support of the combined schema upgrade such that all states be on schema version r38. AEMO further notes that the proposed Q4 2021 effective date follows the Five Minute Settlement effective date.
	25	Jemena Gas Networks	JGN notes that at the January 2020 GRCF meeting, market participants expressed a preference for implementing the proposed changes in Q4 2021. JGN wishes to advise we are able to accommodate a Q4 2021 effective date, however we recommend the proposed CDN/CDR changes are implemented at the same time.	AEMO notes Jemena Gas Networks' ability to accommodate a Q4 2021 effective date. The effective date of any changes to CDN or CDR will be decided outside consultation IN003/20.
	26	Momentum Energy	Momentum Energy supports AEMO's assessment of the proposal.	AEMO notes Momentum Energy's support of AEMO's assessment.
	27	Multinet Gas Networks	Multinet Gas Networks supports the fundamental changes however there are some clarifications and additions required for the Participant Build Packs as mentioned below.	AEMO notes Multinet Gas Networks' support of the changes and has provided feedback to Multinet's specific comments on the Participant Build Packs in the below sections.
	28	Origin Energy	AEMO's assessment of sections 1 to 9 is accurate.	AEMO notes that Origin Energy has appraised AEMO's assessment as accurate.



Topic	Ref #	Company	Response	AEMO Response
	29	Powershop Australia	Yes.	AEMO notes Powershop Australia's support for AEMO's proposal and notes that this directly contradicts its later feedback to the supplementary questionnaire, despite the fact that AEMO issued no additional information or technical documentation between the issuance of the PPC and the supplementary questionnaire.
	30	Red and Lumo Energy	Red Energy and Lumo Energy support this PPC (IN003/20) as it stands, with an implementation date of Q4 2021, as well as the associated aseXML schema uplift to version r38. Please correct the following in the PPC, Section 1.1: LifeSupportNotification (LSN) and LifeSupportRequest (LSNR).	AEMO notes Red Energy's and Lumo Energy's support for AEMO's proposal and for the Q4 2021 effective date. AEMO has corrected the noted typo in the relevant section of this IIR.
	31	Simply Energy	While Simply Energy is supportive of Q4 2021 implementation, we are equally supportive of an earlier implementation considering we do not adopt LSR as mentioned in the above two sections.	AEMO notes Simply Energy's support of the Q4 2021 effective date. Regarding the LSR adoption, refer to AEMO's response to Ref 10 in Section 1 of Attachment B.



ATTACHMENT F – TECHNICAL FEEDBACK GIVEN TO PPC

Section 4 – Feedback on Ref #1 Participant Build Pack - Process Flow Table of Transactions

Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
32	AGL		Information Correct		AEMO notes AGL's response.
33	AGL		It is noted, however, that clarity will need to be provided to reference Retailer for this transaction group, not FRO, as this transaction must be able to be sent by a prospective retailer, not just the FRO. Current definitions tend to imply retailer=FRO.		AEMO supports AGL's suggested change. The following will be added to the "Comments" column for T80 and T82: "Retailer includes "New FRO" and "Existing FRO" for this transaction".
34	Australian Gas Networks	Participant Build Pack 1 - Process Flow Table of Transactions v3.6 'Elements' worksheet	Should the LS B2B elements be included in the 'Elements' worksheet?		AEMO supports AGN's suggestion to add the LS B2B elements to the Elements tabs of the worksheet.
35	Simply Energy	82 and 83	Simply energy does not support LifeSupportRequest transaction to be added in PBP3		AEMO's response to this feedback is provided in Ref #10.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
36	AGL		Information Correct		AEMO notes AGL's response.
37	Australian Gas Networks	Section 4.7.2 (c)	If the DB is the owner and this item relates to a Move-in then a notification to current FRO may be out of date information. Should (c) only apply to In-Situ?	Section 4.7.2 (c)	AEMO does not support limiting clause 4.7.2(c) to in-situ only. This would contravene NERR clause 124B(2)(b), which requires that the distributor notify the new retailer of life support equipment if the distributor becomes aware of a change in retailer.
38	Australian Gas Networks	Section 4.7.2 (e)	Clarification needed on "In the absence of relevant request"..... Is this related to 4.7.3 (b) absent?	Section 4.7.2 (e)	The "relevant request" refers here to a LifeSupportRequest transaction, since (as per clause 4.7.3(b)) "the Recipient of a valid LifeSupportRequest must provide a LifeSupportNotification and use best endeavours to respond within 2 business days and no later than 5 business days".
39	Australian Gas Networks	Section 4.7.2 (Transaction Data Elements Table)	Some elements are missing that were in agreed Life Support Guide CSV file specification table e.g. LSCONTACTNAMETITLE, LSCONTACTNAMEGIVEN, LSCONTACT NAMEFAMILY etc.. Should these be included or are only Electricity Gas Life Support B2B Transaction elements to be included? Also, SERVICETYPE, SERVICETYPE2 not included.	Section 4.7.2 (Transaction Data Elements Table)	As noted in section 1.2 of the PPC, gas retail market participants broadly expressed that the electricity LSN and LSR should be adopted. As such, additional fields will not be considered as part of this consultation. If AGN believes that the missing elements should be included, AGN should prepare a separate GMI stating the reason why these additional elements should be included.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
			What were these used for in the guide? Are they needed?		AEMO notes that the Gas Life Support Industry Guide is an industry-agreed document, not an AEMO guideline or procedure. As such, AEMO cannot comment on how participants should use fields like SERVICETYPE and SERVICETYPE2 in the guide.
40	Multinet Gas Networks	4.7.2 Transaction Data Element Table	TransactionAcknowledgement specific events codes have not been specified to confirm what codes can be used if transaction received does not meet the required transaction data elements		In relation to the TransactionAcknowledgement specific events for the two new transactions LifeSupportNotification, LifeSupportRequest, the applicable electricity B2B procedures for these transactions didn't apply any restriction on the event codes. That same approach is being applied for gas meaning any of the event codes in Appendix C (Gas FRC Application Event Codes) of Participant Build Pack 3 - Interface Definitions are valid event codes.
41	Multinet Gas Networks	4.7.2 Transaction Data Element Table	Why is DateRequired an optional value? Assumption would be that this is a mandatory value for both Registration and Deregistration		The date is an optional value. It has been defined this way because it is not required when LifeSupportStatus is "None". This is how it is defined in the electricity B2B procedures.
42	Multinet Gas Networks	4.7.3 Transaction Data Element Table	TransactionAcknowledgement specific events codes have not been specified to confirm what codes can be used if transaction		See AEMO's response in Ref # 40.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
			received does not meet the required transaction data elements		
43	Multinet Gas Networks	4.7.3 Transaction Data Element Table	CONFIRMATION REQUIRED OF WHO CAN SEND A LSR AS THE TRANSACTION DATA ELEMENTS 4.7.3 ONLY MENTION DISTRIBUTOR TO RETAILER AND VICE VERSA HOWEVER I AM NOT SURE WHERE IT SPECIFIES THAT THE RETAILER MUST BE THE CURRENT FRO. MGN DOES NOT BELIEVE LSN SHOULD BE SENT FROM DB TO FRO OTHER THAN CURRENT FRO		Given the term used for the Life Support Request is "Retailer" then it is not restricted to a Retailer that is the FRO. This is consistent with how it is defined in the electricity B2B procedures and the NERR.
44	Red and Lumo Energy	4.7 PBP3 & SA FRC B2B (as required)	Recommend removing clause and part numbers of the regulations, as these may change and then require consequential amendment to the RMP/GIP.	Part 7 of the National Energy Retail Rules (NERR) places specific obligations on both Retailers and Distributors in relation to obtaining, storing, exchanging and managing Life Support information. In Victoria part 7 of the Energy Retail Code, and section 4A of the Gas Distribution System Code the places specific	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
				obligations on both Retailers and Distributors in relation to obtaining, storing, exchanging and managing Life Support information.	
45	Red and Lumo Energy	4.7.2(b) PBP3 & SA FRC B2B	Amendments for clarity.	b) Where the Distributor or Retailer is informed by a customer that they require life support or there are life support status changes to the life support information or requirement , they must advise the other party using the LifeSupportNotification with the information defined in the Transaction Data Elements table.	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.
46	Red and Lumo Energy	4.7.2(d) PBP3 & SA FRC B2B	A retailer and a distributor are not required under the regulations to remove a customer. clarity added to the clause.	d) Where the Retailer or Distributor decides to has completed the deregistration process for a Life Support customer, they must send the other party an updated LifeSupportNotification.	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
47	Red and Lumo Energy	Trigger and in wording under Transaction Definition Table (PBP3) & SA FRC B2B	Amendments for clarity.	This interface is triggered when either a Retailer or Distributor establishes or makes a change to a customer's Life Support data.	AEMO supports Red and Lumo Energy's suggestion to add the words "establishes or" to the Definition Table trigger cell in section 4.7.2 on PBP3 B2B Interface Definition document and section 4.7.2 of the SA FRC B2B System Interface Definition document.
48	Red and Lumo Energy	Wording under in Transaction Definition Table (PBP3) & SA FRC B2B	Amend the wording to reflect the transaction name.	Replace: Life Support Notification with: LifeSupportNotification	AEMO will make this change.
49	Red and Lumo Energy	LSContactEmailAddress (transaction data element - PBP3) & SA FRC B2B	Amend wording in the usage column - as EIC is not required for the use of a customer's email address, but consent from the customer is required. This is not an EIC requirement under the NERL, NERR or ERC.	Must be the email address of the person who is the contact for the management of Life Support requirements where the initiator has obtained Explicit Informed Consent for the use of the email address.	AEMO will make this change; further, AEMO will notify its electricity market personnel of this change in order that the analogous change can be considered for electricity retail procedures.
50	Red and Lumo Energy	4.7.2 (transaction data element table)	The options of Mandatory / Optional / Not Required should be reviewed against current requirements	Example... RegistrationOwner > ⊖ M/N DateRequired > ⊖ M/N LSEquipment > ⊖ R/N LSContactName > ⊖ R/N	AEMO does not support this change. The way the gas technical protocols are to be written is described in PBP2 Usage Guide. Section 4 describes how the data elements are to be defined and for gas the choices are restricted to just Mandatory/Optional/Note Required. AEMO applied these descriptions to the



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
					new transaction in order to maintain consistency. The electricity technical protocols have their own prescribed way of writing up requirements.
51	Red and Lumo Energy	4.7.3(e) & SA FRC B2B	Amendment for clarity	Replace: NMI With: MIRN	AEMO will make this change.
52	Red and Lumo Energy	4.7.3(f) & SA FRC B2B	Amendment for clarity	If parties wish to obtain mass updates of information, parties must reach an agreement to use this transaction for that purpose .	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.
53	Red and Lumo Energy	post 4.7 & SA FRC B2B	aseXML schema sample to be added.		AEMO will include a sample aseXML transaction in the documentation.
54	Red and Lumo Energy	aseXML Element name (Appendix A1) & SA FRC B2B	Consistent with amendment above. EIC not required, only customer consent for the use of an email address.	Must be the email address of the person who is the contact for the management of Life Support requirements where the initiator has obtained Explicit Informed Consent for the use of the email address.	AEMO will make this change; further, AEMO will notify its electricity market personnel of this change in order that the analogous change can be considered for electricity retail procedures.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
55	Red and Lumo Energy	Appendix D - Table of	Item numbers 80/81, 82/83 are missing from the table. Please add.		AEMO will make the proposed change
56	Red and Lumo Energy	Transaction Cross Reference & SA FRC B2B			AEMO will update Appendix D of the FRC B2B System Interface Definitions to include the new transactions.
57	Red and Lumo Energy	SA - 2.2 & VIC - 2.2	Scope table - group CUST should include 80-83.		AEMO will make the proposed change.
58	Simply Energy	4.7.2	LifeSupportStatus should have the values of 'Registered' and 'Deregistered'	<p><u>LifeSupportStatus:</u></p> <ul style="list-style-type: none"> • Registered - No Medical Confirmation • Registered - Medical Confirmation • Deregistered - No Medical Confirmation • Deregistered - Customer Advice • Deregistered - No Customer Response • None <p><u>Notes regarding the allowable values</u></p> <p><u>"Registered - No Medical Confirmation" means the customer has advised the Retailer/Distributor that</u></p>	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
				<p><u>they require life support equipment at the identified premise but have not yet provided medical confirmation to the Retailer or Distributor notified.</u></p> <p><u>“Registered - Medical Confirmation” means the customer has advised the Retailer/Distributor that they require life support equipment at the identified premise and the Retailer/Distributor notified has received medical confirmation from the customer.</u></p> <p><u>“Deregistered - No Medical Confirmation” means the Retailer/Distributor who was initially notified of the life support equipment has attempted to gain medical confirmation from the customer, but the customer has not obliged. The Retailer/Distributor has completed the necessary steps to formally deregister the life support requirement at the</u></p>	



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
				<p><u>identified premise with the customer as per the NERR, the Energy Retail Code (VIC), or the Gas Distribution Code (VIC) and the customer did not provide medical confirmation during the deregistration process.</u></p> <p><u>“Deregistered - Customer Advice” means a customer has advised the Retailer/Distributor that the person who required life support equipment has vacated the premises or no longer requires the life support equipment. The Retailer/Distributor has completed the necessary steps to formally deregister the life support requirement at the identified premise the NERR, the Energy Retail Code (VIC), or the Gas Distribution Code (VIC).</u></p> <p><u>“Deregistered - No Customer Response” means, where a Distributor has registered a customer’s</u></p>	



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
				<p>premises on the advice of the Retailer, the Distributor has commenced deregistration of the premises when it becomes aware that the customer has transferred to a new Retailer. The Distributor has completed the necessary steps to formally deregister the life support requirement at the identified premise as per the NERR, the Energy Retail Code (VIC), or the Gas Distribution Code (VIC).</p> <p>"None" means that the premises doesn't have a current Life Support requirement.</p>	
59	Simply Energy	4.7.2	LSEquipment should have Gas fuelled life support equipment list	<p>Allowable values to be included as follows (as per NERR):</p> <ul style="list-style-type: none"> • Oxygen Concentrator • Intermittent Peritoneal Dialysis Machine • Kidney Dialysis Machine 	<p>The allowable values are described in Appendix A (Data Dictionary) A1 aseXML elements. These allowable values are the same values that are in electricity B2B procedures which is what the GRCF requested.</p> <p>If SE believes that there is a need to add gas fuelled LS equipment should be included, SE should prepare a separate GMI stating the reason why these</p>



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
				<ul style="list-style-type: none">• Chronic Positive Airways Pressure Respirator• Crigler Najjar Syndrome Phototherapy Equipment• Ventilator for Life Support• Other (as per AER guideline, this includes but not limited to)<ul style="list-style-type: none">• external heart pumps• respirators (iron lung)• suction pumps (respiratory or gastric)• feeding pumps (kangaroo pump, or total parenteral nutrition)• insulin pumps• airbed vibrator• hot water• nebulizer, humidifiers or vaporizers• apnoea monitors	additional allowable LS equipment values should be included.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
				<ul style="list-style-type: none"> • _____ medically required heating and _____ air conditioning • _____ medically required refrigeration • powered wheelchair 	
60	Simply Energy	4.7.2	DateRequired field should have the 'Usage' comments	<p>Suggested comments for 'DateRequired':</p> <p>For a registration of Life Support, this date will be the date Life Support protections commence at the premises.</p> <p>For a deregistration of Life Support, this date will be the date Life Support protection ceases to be provided at the premises.</p> <p>For response to a Life Support Request, this will be the effective date of the Life Support registration in the participants system.</p>	The details on how DateRequired will be applied are described in Appendix A (Data Dictionary) A1 aseXML elements. The column titled "Description" includes the information how the element needs to be interpreted. AEMO therefore does not support this change.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
				Not required when LifeSupportStatus is None.	
61	Simply Energy	4.7.3	Do not support the inclusion of this section as per the comments above	Delete 4.7.3 in its entirety	AEMO's response to Simply Energy's feedback regarding LSR is given in Ref #10.
62	Simply Energy	4.7.3	Moreover, the LSR transaction 'SpecialNotes' does not require reference to 'update' or 'reconciliation' in the comments.	<p>SpecialNotes suggested text:</p> <p>Required if Reason is "Other"</p> <p>Not required if Reason is</p> <ul style="list-style-type: none"> Confirm Life Support Data Quality Issue No response to rejected LSN <p>"Update"</p> <p>"Reconciliation"</p>	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.
62A	GRCF	4.7.2 (e)	Remove the reference to one business day.	In the absence of a relevant request, the LifeSupportNotification must be provided within one business day of the relevant data being	AEMO will make the proposed change.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
				<p>updated or changed. In the absence of a relevant request, the LifeSupportNotification must be provided as per the timing obligation defined in the National Energy Retail Rules (NERR) (Rule 124 (1) (c), Victorian Energy Retail Code (Clause 125 (1) (a)) and Victorian Gas Distribution Code (Clause 4A.3 (1) (iv), as applicable.</p>	



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
63	AGL		Noted – however see previous comment – AGL would expect this to be the latest available schema		AEMO notes AGL’s comment and refers to the minutes for the GRCF meeting held 18 February 2020, at which the GRCF agreed that it would be satisfactory for IN003/20 to only consider a move to r38, with a subsequent move to r39 or beyond to be costed separately following IN003/20.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
64	AGL		Noted – however see previous comment – AGL would expect this to be the latest available schema		AEMO notes AGL's comment and refers to the minutes for the GRCF meeting held 18 February 2020, at which the GRCF agreed that it would be satisfactory for IN003/20 to only consider a move to r38, with a subsequent move to r39 or beyond to be costed separately following IN003/20.
65	Australian Gas Networks	Gas Interface Protocol (Queensland) version 21.0	Version release comments missing		AEMO notes AGN's comments and will provide version release comments in the draft procedures issued with the IIR.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
66	AGL		Noted		AEMO notes AGL's comment.
67	Red and Lumo Energy	5.16 Customer Details Information	Sensitive_Load_Flag has Comments of: "Y" = Yes, "N" = No, "L" = Life Support. Will "L" still be required?	A code that indicates whether the Retailer classifies the supply point as a sensitive load "Y" = Yes, "N" = No, "L" = Life Support.	AEMO notes that electricity has retained the "L" enumeration for sensitive load. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.



Section 9 – Feedback on Ref #6 Participants Build Pack 6 - The NSW/ACT Wagga Wagga and Tamworth specific Participant Build Pack 6

Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
68	AGL		Noted		AEMO notes AGL's response.
69	Australian Gas Networks	2. Overview of Interfaces	Transformation engine for Wagga Wagga and Tamworth. Our planned scope of work <u>only</u> includes the generic Schema Version related transactions. Any transactions requiring Transaction Specific Transforms (not schema version related) are <u>not</u> in our planned scope of work, and the AEMO transformation process will need to continue to cater for these.		As per AGN's feedback, AEMO's transformation process will continue to perform the Transaction Specific Transforms. As such, AEMO will reinstate the deleted sentence in section 2.1 of PBP6.
70	Red and Lumo Energy	5.16	5.16 Removal of reference to Life Support Sensitive Load	The retailer will send as per NSW/ACT format refer to section 5.16.1 (CustomerDetailsNotification/CSVCustomer) of Participant Build pack 5., with the exemption that the Life Support flag value in the Sensitive_Load field is not support in NSW WW&T format.	AEMO does not support Red and Lumo Energy's proposed deletion. The CustomerDetailsNotification transaction in use as per the FRC B2B System Interface Definitions v4.7 currently only allows the Sensitive_Load_Flag field to take "Y" or "N" as values; as such, the material that Red and Lumo Energy proposes to delete remains pertinent.



IMPACT & IMPLEMENTATION REPORT (IIR)

ISSUE No: IN003/20

Section 10 – Feedback on Ref #7 Gas Interface Protocol – NSW/ACT



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
71	AGL		Noted		AEMO notes AGL's response.



Section 11 – Feedback on Ref #8 - AEMO Specification Pack - FRC B2B System Interface Definitions

Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
72	AGL		Noted		AEMO notes AGL’s response.
73	Multinet Gas Networks		Please confirm this is same as above ref: Ref #2 - Participant Build Pack 3 - Interface Definitions or if the above should be Build Pack 2?		Ref #8 is the South Australian AEMO Specification Pack – FRC B2B System Interface Definitions document which is the equivariant to the Victorian Participant Build Pack 3 - Interface Definitions. There are no changes for Victorian Participant Build Pack 2.
74	Red and Lumo Energy	4.7 BBP3 & SA FRC B2B (as required)	Recommend removing clause and part numbers of the regulations, as these may change and then require consequential amendment to the RMP/GIP.	<p>Part 7 of the National Energy Retail Rules (NERR) places specific obligations on both Retailers and Distributors in relation to obtaining, storing, exchanging and managing Life Support information.</p> <p>In Victoria part 7 of the Energy Retail Code, and section 4A of the Gas _____</p> <p>Distribution System Code the places specific obligations on both Retailers and Distributors in relation to obtaining, storing, exchanging and managing Life Support information.</p>	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
75	Red and Lumo Energy	4.7.2(b) PBP3 & SA FRC B2B	Amendments for clarity.	b) Where the Distributor or Retailer is informed by a customer that they require life support or there are life support status changes to the life support information or requirement , they must advise the other party using the LifeSupportNotification with the information defined in the Transaction Data Elements table.	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.
76	Red and Lumo Energy	4.7.2(d) PBP3 & SA FRC B2B	A retailer and a distributor are not required under the regulations to remove a customer. clarity added to the clause.	d) Where the Retailer or Distributor decides to has completed the deregistration process for a Life Support customer, they must send the other party an updated LifeSupportNotification.	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.
77	Red and Lumo Energy	Trigger and in wording under Transaction Definition Table (PBP3) & SA FRC B2B	Amendments for clarity.	This interface is triggered when either a Retailer or Distributor establishes or makes a change to a customer's Life Support data.	As per Ref #47, AEMO will make the suggested change.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
78	Red and Lumo Energy	Wording under in Transaction Definition Table (PBP3) & SA FRC B2B	Amend the wording to reflect the transaction name.	Replace: Life Support Notification with: LifeSupportNotification	AEMO will make this change.
79	Red and Lumo Energy	LSContactEmailAddress (transaction data element - PBP3)	Amend wording in the usage column - as EIC is not required for the use of a customer's email address, but consent from the customer is required. This is not an EIC requirement under the NERL, NERR or ERC.	Must be the email address of the person who is the contact for the management of Life Support requirements where the initiator has obtained Explicit Informed Consent for the use of the email address.	AEMO will make this change; further, AEMO will notify its electricity market personnel of this change in order that the analogous change can be considered for electricity retail procedures.
80	Red and Lumo Energy	& SA FRC B2B			AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.
81	Red and Lumo Energy	4.7.3(e) & SA FRC B2B	Amendment for clarity	Replace: NMI With: MIRN	AEMO will make this change.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
82	Red and Lumo Energy	4.7.3(f) & SA FRC B2B	Amendment for clarity	If parties wish to obtain mass updates of information, parties must reach an agreement to use this transaction for that purpose .	AEMO does not support this change. In the interests of harmonisation, AEMO does not believe it is warranted to deviate from the life support provisions in electricity procedures unless participants can show that the electricity provisions are inappropriate for gas.
83	Red and Lumo Energy	post 4.7 & SA FRC B2B	aseXML schema sample to be added.		AEMO will include a sample aseXML transaction in the documentation.
84	Red and Lumo Energy	aseXML Element name (Appendix A1) & SA FRC B2B	Consistent with amendment above. EIC not required, only customer consent for the use of an email address.	Must be the email address of the person who is the contact for the management of Life Support requirements where the initiator has obtained Explicit Informed Consent for the use of the email address.	AEMO will make this change; further, AEMO will notify its electricity market personnel of this change in order that the analogous change can be considered for electricity retail procedures.
85	Red and Lumo Energy	Appendix D - Table of Transaction Cross Reference & SA FRC B2B	Item numbers 80/81, 82/83 are missing from the table. Please add.		AEMO will make the proposed change.
86	Red and Lumo Energy	SA - 2.2 & VIC - 2.2	Scope table - group CUST should include 80-83.		AEMO will make the proposed change.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
					AEMO will make the proposed change.
86A	GRCF	4.7.2 (e)	Remove the reference to one business day.	In the absence of a relevant request, the LifeSupportNotification must be provided within one business day of the relevant data being updated or changed. <u>In the absence of a relevant request, the LifeSupportNotification must be provided as per the timing obligation defined in the National Energy Retail Rules (NERR) (Rule 124 (1) (c), Victorian Energy Retail Code (Clause 125 (1) (a)) and Victorian Gas Distribution Code (Clause 4A.3 (1) (iv), as applicable.</u>	AEMO will make the proposed change.



Ref	Company	Section #	Issue / Comment	Proposed text	AEMO Response
87	AGL		Noted – however see previous comment – AGL would expect this to be the latest available schema		AEMO notes AGL’s comment and refers to the minutes for the GRCF meeting held 18 February 2020, at which the GRCF agreed that it would be satisfactory for IN003/20 to only consider a move to r38, with a subsequent move to r39 or beyond to be costed separately following IN003/20.

ATTACHMENT G – RESPONSES TO SUPPLEMENTARY QUESTIONNAIRE

Question 1 – Benefits of change

Please provide, in detail, what benefits the change will have on your organisation (in terms of efficiency, customer benefits, privacy, etc.). If any monetary benefits are provided (e.g. in terms of annual FTE savings), these will be kept confidential.

Ref	Organisation	Feedback	AEMO's feedback
1	ActewAGL	<p>This change will result in a number of benefits to both industry and individual market participants. From ActewAGL's perspective, the two most significant benefits of this change relate to efficiencies gained and the management of regulatory obligations.</p> <p>There are many efficiencies to be gained through the synergy of Life Support processes for electricity and gas. It is expected these efficiencies will be realised in the following areas:</p> <ul style="list-style-type: none"> • Automated processes require less manual intervention, therefore reducing resourcing requirements through lessened Average Handling Time • Reduction of errors related to manual intervention • The simplification of training and procedures requiring little if any, tailoring for each fuel • Reduced requirement for specialised "Life Support" staff • Reduction of cost associated with maintaining separate Life Support related IT code for each fuel • Timeframes around the delivery of transactions will be significantly increased • Increased capacity for transaction volumes <p>From the management of regulatory obligations perspective, the uniformity of the transfer of Life Support information will</p>	AEMO notes the benefits provided by ActewAGL.



Ref	Organisation	Feedback	AEMO's feedback
		<p>strengthen our ability to ensure continued compliance associated not only with Life Support, but also with Privacy and Risk Management requirements. These changes will allow for:</p> <ul style="list-style-type: none"> • Increased confidence in the accuracy of life support information that is sent and received • Centralised (contained within one system) traceability for each transaction • Reduced risk associated with wrongful disconnection of life support customers. • The mitigation of Privacy issues resulting from the use of standardised transactions as opposed to email 	
2	AGL	<p>The current gas LSN process is one where a CSV file is generated, zipped and e-mailed to a gas DB. As well as being somewhat manual, there is no clear recorded or auditable process to ensure that the transaction is received by the gas DB or that the contents are acknowledged by the gas DB. While this poses some risk for the sending retailer, AGL would suggest that the higher risk is on the gas DB. Moving to an aseXML process provides assurance for the sending party that the initiating transaction is received by the gas DB (transaction acknowledgement), and that the content is processed by the gas DB (business acknowledgement).</p> <p>The transaction and business acknowledgements are tracked and a failure of an acknowledgement would generate an exception process which would lead to the information being re-sent to the DB.</p> <p>Further, this process would align the gas and electricity processes for sending Life Support information.</p>	AEMO notes the benefits provided by AGL.



Ref	Organisation	Feedback	AEMO's feedback
3	Alinta Energy	<p>Alinta Energy supports this initiative.</p> <p>The current solution that was deployed is not fit for purpose and was only ever meant to serve as an interim solution, it is not a reliable, effective and efficient process and Alinta Energy believes there is substantial measurable benefits in ensuring the same protections and supporting processes that have been afforded to electricity customers are also afforded to gas. In additional, the high-level benefits are;</p> <ul style="list-style-type: none">• The estimated savings to our business based on the current volumes (which are expected to increase based on Victoria implementation) is [REDACTED] per annum• The significant savings are the potential non-compliance savings due to a reliable transaction• A B2B solution for life support will limit the risk of process errors that could result in the disconnection of gas supply for a life support customer. The risk to reputation and of potential fines for regulatory breaches will be minimised.• The current email based manual life support process is prone to errors due to inconsistent CSV file formats requiring manual system upload.• There are potential privacy issues when dealing via email with the current process.• Supports retailers and distributors processes meeting regulatory obligations.	<p>AEMO notes the benefits provided by Alinta. AEMO notes as per Section 6 that it has considered the change in light of FTE, internal process and potential compliance issues savings, as it would for all consultations in line with the Approved Process and Section 135EB of the NGR.</p>



Ref	Organisation	Feedback	AEMO's feedback
		<p>It is important to note that as part of the pre-consultation all involved industry participants indicated unanimous support for the deployment of life support transactions into B2B.</p> <p>AEMO's concerns raised in the issue paper pertaining to a single participant who supports the initiative but has indicated cost to deploy based on their individual vendor has returned a significant figure, in our opinion does not constitute as significant evidence that this change is not in line with the NGO.</p> <p>Alinta Energy urges AEMO and participants to consider these changes in the same light as per our electricity implementation, which is to complement and support processes and compliance with the overall objective of providing vulnerable customers with adequate protections.</p> <p>Every participant will be burdened with a cost to deploy however, the pay-back period in consideration of FTE, internal process and potential compliance issues savings should be considered. It is also imperative that a single Tier 1 retailer is not seen to be blocking a supported solution due to constraints by their vendors and should consider the impacts this would have on other market participants and customers.</p>	
4	AusNet Services	<p>In electricity, the introduction of LSN and LSR transactions have been essential in dealing with the higher volumes of life support transactions received since the NERR changes were implemented. In gas, we expect high transaction volumes as national retailers are likely to start at over 1,000 gas life support registrations with the conclusion of the "best endeavours" transitional on 1 July 2020. This could quickly grow by 1,000 per year as retailers register life support assuming dual fuel, without first checking the</p>	AEMO notes the benefits provided by AusNet Services.



Ref	Organisation	Feedback	AEMO's feedback
		<p>customer's fuel source needed for their life support equipment (electricity, gas or dual fuel).</p> <p>As observed with electricity, the introduction of LSN and LSR transactions and our associated systems reduced the handling time for registrations. In gas, the alternative starting point of encrypted CSV files is more onerous than the starting point for electricity life support prior to Feb 2019 of a single life support flag in the CDN transaction.</p> <p>To handle this new obligation and surge in processing requirements, AusNet Services is hiring a new team of staff to manage gas life support registrations, registrations, transacting information retailers via encrypted CSV files and enhanced customer services tailored to meet the needs of these customers. The estimated cost increase on our business is currently estimated at [REDACTED] per year.</p> <p>In addition to these staff costs, is the potential for missed notifications from retailer staff to erroneous email addresses of our other distribution business staff. Based on our experience, retailer staff direct request and enquiry emails to the incorrect staff contacts at AusNet Services in a weekly basis. Because of this problem, and other problems inherit in relying on an email-based solution, we would expect some compliance breaches without the use of a B2B based LSN transaction.</p>	
5	Australian Gas Networks	<p>For AGN there will be benefits in two broad categories:</p> <p><u>Compliance Risk Avoidance</u></p> <ul style="list-style-type: none"> The existing email based manual life support process is currently plagued with inconsistent CSV file formats received from retailers. Without CSV files in the required standard format, the automated upload process developed by APA for 	AEMO notes the benefits provided by Australian Gas Networks.



Ref	Organisation	Feedback	AEMO's feedback
		<p>the start of the new registration requirements in February 2019 cannot operate. LS customer details received currently need to be manually extracted from the files received, and then manually sorted and uploaded to our system. This makes the LS customer registration process inefficient and prone to error. A B2B process will ensure consistent application/processes followed by all Retailers. Currently we are seeing varying differences and regular follow up with Retailers on the data provided and process used. The query process can take time to resolve and added risk for the customer not being protected appropriately.</p> <ul style="list-style-type: none"> • A B2B solution for life support will limit the risk of processing errors that could result in the wrongful disconnection of gas supply for a life support customer. The risk to reputation and of potential fines of \$20,000 per regulatory breach will be minimised. • There are potential privacy issues when dealing via email with the current process. Both Retailer and DB must ensure all communication is password protected. • As LS registration volumes increase, compliance risk also increases. Our experience in the SA and Qld markets in the last 12 months has shown an acceleration in registrations. With Victoria having now commenced, we anticipate a further increase. <p><u>Cost Savings – FTEs</u></p> <ul style="list-style-type: none"> • With the increase in LS registrations in 2019 for SA/QLD and with the introduction of Victoria recently, management of the manual life support process now requires [REDACTED]. We anticipate that if the volume of registrations continue to increase we may require [REDACTED] to manage the manual 	



Ref	Organisation	Feedback	AEMO's feedback
		LS registration and deregistration process. This will equate to approximately [REFACTED] per annum. These annual costs will be saved with the B2B solution.	
6	EnergyAustralia	<ul style="list-style-type: none"> Reduction in emails between retailers and gas distributors to clarify Life Support details; most of this interaction can be moved to B2B via LSRs and responding LSNs. However, the number of registered gas life support customers is low, thus the volume of email communications currently is low. Due to low volumes of gas life support registrations compared to electricity, EnergyAustralia does not believe this change would result in significant FTE savings. Transaction acknowledgement (accept or reject) will improve data quality and efficiency. Alignment of transaction delivery to aseXML will reduce further cost and effort of gas schema upgrade/alignment in the future. 	AEMO notes the benefits provided by EnergyAustralia.
7	Jemena	<p>As previously indicated, Jemena Gas Networks (JGN) is highly supportive of the proposed LSN and LSR changes. JGN estimates the benefits of this change to our business will be [REDACTED] over the next 10 years. These benefits include:</p> <ul style="list-style-type: none"> FTE savings Operational efficiencies Reduced regulatory and compliance costs (i.e. AER penalties) Reduced customer costs 	AEMO notes the benefits provided by Jemena.



Ref	Organisation	Feedback	AEMO's feedback
8	Momentum Energy	<p>Slight increase to productivity and efficiency.</p> <p>Slight decrease in risk to incorrect handling and breach of privacy.</p>	AEMO notes the benefits provided by Momentum Energy.
9	Multinet Gas Networks	<p>MGN believes that the market processes really do need to be improved so that we are able to adequately support Life Support customers and meet our obligations without the risk of damaging our reputation and also incurring potential fines for regulatory breaches.</p> <p>Victorian distributors need better information/contact details and for this information to be received in a timely manner so we are able to provide our life support customers with the best possible protection and notifications for supply interruptions.</p> <p>With significant emphasis from the Australian Regulators and from the Community to ensure compliance to this process, we believe that automation is pivotal in maintaining our data records accurately and in a timely manner.</p> <p>MGN believes that by implementing a B2B solution for life support this will most certainly reduce errors/mistakes that could be made within the current manual process of populating a CSV file and relying on email transmission of this data. B2B is a much more efficient process that enables updates to be sent through within a timely manner therefore minimising errors that could result in the disconnection of gas for a life support customer and can have system checks incorporated to ensure any possible errors are identified within B2B transactions</p> <p>It will also reduce risk of handling/ storing personal identifying information through email.</p>	AEMO notes the benefits provided by Multinet Gas Networks.



Ref	Organisation	Feedback	AEMO's feedback
		<p>MGN does believe that there will be a significant increase of Life Support accounts that require registration within our database and as Distribution Code changes have now been made for Victoria, we foresee that to manage this task via the current manual CSV file will need an extra [REDACTED] a year to manage this process at a cost of approximately [REDACTED] a year.</p> <p>By Implementing the B2B solution MGN believes that it will reduce the workload required by [REDACTED] to around 10% which could then be absorbed within current employee volumes.</p>	
10	Origin Energy	<p>The change is expected to not deliver additional monetary benefits from FTE savings to our organisation as the existing CSV process is an automated process. There are no quantifiable additional benefits in term of efficiency, customer benefits or privacy – the CSV file is sent within the required time frame and is password protected.</p>	<p>AEMO notes that Origin Energy does not expect the change to deliver benefits in terms of FTE savings, efficiency, customer benefits, or privacy.</p>
11	Powershop	<p>As touched on in Powershop's previous response, the benefit to the business is one from a technical consistency perspective as all life support customers will be managed with an LSN/ LSR.</p> <p>The customer benefit is minimal because they will be receiving life support protections regardless of the technical solution.</p> <p>There is no monetary benefit to this change for Powershop given the number of life support customers' vs the potential cost of implement the change.</p>	<p>AEMO notes that Powershop's feedback to the supplementary questionnaire is diametrically opposed to its feedback to the PPC. Given that AEMO has not provided additional information between the issuance of the PPC and of the supplementary questionnaire, AEMO does not see why Powershop's responses would have varied so substantially between those two response periods. Given that Powershop has not provided reasons for its reversal in position, it is not clear which of the two (opposed) positions AEMO should consider as authoritative and how</p>



Ref	Organisation	Feedback	AEMO's feedback
			AEMO should weight the two accordingly in its deliberations.
12	Red and Lumo Energy	[REDACTED]	AEMO notes that Red and Lumo Energy has redacted its full submission.
13	Simply Energy	<p>Simply Energy believes that there are tangible (process improvement/efficiency based) and intangible (risk based) benefits of introducing LSN/LSR transactions because:</p> <ul style="list-style-type: none">• the current process of sending csv extract is manual and labour intensive• the current process is not real-time and poses a risk on compliance (potential breach situations)• cost of implementing LSN does not materially impact the operational processes because of its alignment with electricity and its ability to be integrated in automated workflows with little manual intervention, only when an exception arises.	AEMO notes the benefits provided by Simply Energy.



Please provide what costs the change will create for your organisation as an order of magnitude (i.e. “low”, “medium”, or “high”). If any monetary values (e.g. once-off implementation costs, and any ongoing annual cost) are provided (e.g. in terms of the cost of system changes), these will be kept confidential.

Ref	Organisation	Feedback	AEMO’s feedback
14	ActewAGL	It is anticipated the gas life support changes will leverage from existing code that supports electricity life support functionality. The existing code will provide a solid foundation for gas life support and will allow for any variances without any significant impact. For this reason, it is expected the cost to implement these changes would be Low to Medium.	AEMO notes the costs provided by ActewAGL.
15	AGL	Cost implementation is medium. However, the management of the processes and systems post implementation would be reduced as it would be a common process for both gas and electricity.	AEMO notes the costs provided by AGL and the savings that would occur if the change were progressed.
16	Alinta Energy	Alinta Energy are currently undergoing an extensive re-design and implementation of a new retail system. The proposed timeframes that we expect this change along with potentially other changes (Gas Harmonisation) will be factored into our system releases in order to deliver a cost effective and compliant solution for our business, and our customers. In the long term, the cost of not implementation this change will have detrimental monetary impacts to not only pour future build for a gas solution to support manual extensive processes outside of a system, but also will occur significate annual cost on staff to support and ensure compliance monitoring of all manual transaction in order to identified potential issues. We would not carry the same monetary burden through a harmonised electricity and gas B2B solution.	AEMO notes the costs provided by Alinta Energy and the savings that would occur if the change were progressed.



Ref	Organisation	Feedback	AEMO's feedback
17	AusNet Services	<p>AusNet Services is continuing to scope and build the new IT and processes it requires to achieve full compliance. At this time, this work is not yet complete and the costs of implementing the full set of changes cannot yet be calculated with sufficient certainty. Whether our IT system and processes transact with B2B LSN and LSR transaction has only a minor effect on the total cost of this IT and change project.</p> <p>This IT system and processes would enable AusNet Services to substantially meet our obligation with or without the changes to the gas LSN and LSR changes. However, without the changes that leverage B2B transactions for LSNs, we would only be able to reduce our higher operational costs of [REDACTED] per year by [REDACTED]. Additionally, we would not be able to the risk of compliance breaches associated with an email-based solution.</p>	AEMO notes the costs provided by AusNet Services and the FTE savings that would be incurred if the change were progressed.
18	Australian Gas Networks	A high level estimate of LSN and LSR implementation costs is [REDACTED]. Changes will be required across multiple systems.	AEMO notes the costs provided by Australian Gas Networks.
19	EnergyAustralia	<ul style="list-style-type: none"> • Cost impact for EnergyAustralia is high [REDACTED]. • EnergyAustralia requires 7-12 months for formal impact assessment and implementation • Energy Australia's implementation timeframe is subject to change pending more in-depth impact assessment. 	AEMO notes the costs provided by EnergyAustralia.
20	Jemena	JGN believes the costs for implementing this change will be low. JGN estimates the system costs will be [REDACTED]. This figures excludes the costs for updating business processes to support the implementation of this change.	AEMO notes the costs provided by Jemena Gas Networks.
21	Momentum Energy	[REDACTED]	AEMO notes the costs provided by Momentum Energy.



Ref	Organisation	Feedback	AEMO's feedback
22	Multinet Gas Networks	<p>A high-level magnitude of costing for MGN to implementation LSN and LSR costs came in at [REDACTED]. This is a one-off cost and there will be no ongoing costs unless changes are made from the existing functionality built to accommodate the LSN and LSR process.</p> <p>MGN understands this implementation of the B2B process will be considerably complex and require significant changes and collaboration across market participants however we feel that the benefits do out way the costing.</p> <p>MGN requires to build a new interface for Life Support Notification – This will be both inbound and outbound interface.</p> <p>A new interface for Life Support Request - This will be both inbound and outbound interface.</p> <p>Changes required within existing database to update, send and store Life Support details. These Life Support requests/notifications will need to be triggered manually.</p> <p>MGN requires the ability to trigger these transaction and this functionality does not currently exist.</p> <p>Current database does not store life support customer details or time slices. This functionality is required to correctly manage the Life Support and the RP role.</p> <p>Changes to UI, interfaces.</p> <p>Life Support notifications/requests can come from participants who are not currently the FRO in the system. A process to handle these types of transactions will be required to be built.</p>	<p>AEMO notes the costs provided by Multinet Gas Networks and that these costs will be offset in seven years by efficiency savings.</p>



Ref	Organisation	Feedback	AEMO's feedback
		<p>Further changes are also required in MGN's other application that handle the receipt and pass through of these new transactions.</p> <p>Whilst these costs from the outset will not immediately return a financial benefit, over the next 7 years following the implementation of the automation MGN will see a positive cost avoidance.</p>	
23	Origin Energy	The change (i.e. building LSN/LSR mechanism) has been assessed as having a high complexity to implement. [REDACTED]	AEMO notes the costs provided by Origin Energy.
24	Powershop	<p>Powershop has not had sufficient development resource to even scope this change to provide an estimated cost.</p> <p>Anecdotally, any one off development cost that provides no additional positive customer experience is undesirable.</p>	AEMO notes that Powershop has not provided any costs.
25	Red and Lumo Energy	[REDACTED]	AEMO notes that Red and Lumo Energy has redacted its full submission.
26	Simply Energy	<p>Medium impact</p> <p>[REDACTED]</p>	AEMO notes the costs provided by Simply Energy.



Please provide the volume of gas life support customers your organisation currently has registered. Please also provide the average rate of gas life support registrations and de-registrations per month for your organisation, as well as any notes you would like to provide on how AEMO should interpret these data.

Ref	Organisation	Feedback	AEMO's feedback
27	ActewAGL	We have 102 current gas life support customers. We are unable to provide rates of registration and deregistration at this point in time.	AEMO notes the gas life support registration volumes provided by ActewAGL.
28	AGL	[REDACTED] over 2500 transactions in 13 months	AEMO notes the gas life support registration volumes provided by AGL.
29	Alinta Energy	<p>Alinta Energy are currently in the process of reconciling all life support customers in both NECF and Victoria states and cannot provide the requested information at this time.</p> <p>However, we can advise AEMO that the volumes are significantly growing and expected to grow further through the implementation of Life Support protections in Victoria. It is also important to note, that as the current process for life support notifications are not mandated in the retail market procedures, we believe there may be significant number of customers where a life support notification has not been sent or may not have been received by email and therefore cannot guarantee that industry participants are able to correctly provide volumes that would be a reflection of future B2B transaction volumes.</p>	AEMO notes that Alinta Energy is unable to provide gas life support registration volumes at this time.
30	AusNet Services	AusNet Services we expect high transaction volumes as national retailers are likely to start at over 1,000 gas life support registrations with the conclusion of the "best endeavours" transitional on 1 July 2020. This could quickly grow by 1,000 per year as retailers register life support assuming dual fuel, without	AEMO notes the gas life support registration volumes provided by AusNet Services.



Ref	Organisation	Feedback	AEMO's feedback
		first checking the customer's fuel source needed for their life support equipment (electricity, gas or dual fuel).	
31	Australian Gas Networks	<p>In total the APA system has had 1,781 registrations and 501 deregistrations, leaving 1,280 current life support customer registrations.</p> <p>Since 1 February 2019, there have been an average of 121 registrations and 36 deregistrations per month.</p> <p>*Note that these numbers include customers in all of the AGN, Allgas and CRP (Tamworth) networks.</p>	AEMO notes the gas life support registration volumes provided by Australian Gas Networks.
32	EnergyAustralia	<p>EnergyAustralia currently has approximately 3,300 gas accounts registered for life support and this number is slowly increasing. EnergyAustralia receives approximately 10 new gas life support registrations per day; however, following system enhancements this volume has been declining since December 2019.</p> <p>EnergyAustralia processes approximately 5-6 gas life support de-registrations per day</p>	AEMO notes the gas life support registration volumes provided by EnergyAustralia.
33	Jemena	<p>There are currently 4,500 registered gas life support customers NSW and the ACT. Based on currently trends, JGN is forecasting an annual growth rate of 1,000 new gas life support customers per year for the next 10 years. This means that by 2030, there could be over 13,000 registered gas life support customers in NSW and the ACT.</p>	AEMO notes the gas life support registration volumes provided by Jemena.
34	Momentum Energy	<p>53</p> <p>We only have a handful of registrations and de-registrations per month.</p>	AEMO notes the gas life support registration volumes provided by Momentum Energy.



Ref	Organisation	Feedback	AEMO's feedback
35	Multinet Gas Networks	MGN currently has 41 life support customers registered. MGN understands that this volume is low and manageable at this stage utilising existing resources. MGN has had no obligation until this new ruling commences to register accounts with Life Support. MGN previously agreed that it was in the best interests of our customers to flag accounts with Life Support only if the retailers marked them as Medically certified. MGN estimates the volume increase rise to 1000-2000 once this new ruling comes into effect 1st July.	AEMO notes the gas life support registration volumes provided by Multinet Gas Networks.
36	Origin Energy	Origin has 852 gas life support customers flagged as at 30/03/2020. Currently, 146 of the 852 are going through the deregistration process.	AEMO notes the gas life support registration volumes provided by Origin Energy.
37	Powershop	Powershop only retail gas in Victoria and to date we have not identified any customers as requiring gas for life support equipment.	AEMO notes the gas life support registration volumes provided by Powershop.
38	Red and Lumo Energy	[REDACTED]	AEMO notes that Red and Lumo Energy has redacted its full submission.
39	Simply Energy	Total volume of Gas life support customers is in the range of 2000, exact numbers can be provided later however we've been unable to run an extract due to other priorities. Rate of increase 10-15/week for VIC (aggregated for all three VIC DBs) 1-2/week for NSW 2-3/week for SA	AEMO notes the gas life support registration volumes provided by Simply Energy.



Ref	Organisation	Feedback	AEMO's feedback
		The number of LS customers depends on the market share.	



If AEMO decides not to recommend the adoption of LSN and LSR, will your organisation likely make any changes to your existing implementation of the Gas Life Support Industry Guide process? If so, provide details on the type of changes you intend to put forward.

Ref	Organisation	Feedback	AEMO's feedback
40	ActewAGL	No	AEMO notes that ActewAGL would not adopt alternative measures if the LSN / LSR adoption were not pursued.
41	AGL	AGL has already implemented the CSV process as a minimum process requirement. Nevertheless, we would remain concerned that we do not have auditable responses from gas DBs regarding the provision of Life Support Registrations / De-registrations through this process.	AEMO notes that AGL would have concerns about the adequacy of the existing process if the LSN / LSR adoption were not pursued.
42	Alinta Energy	<p>If AEMO decides not to adopt both the LSN and LSR suite of transactions and processes then Alinta Energy can confirm that we would undergo a review into the Gas Industry Guide including a proposal to significantly rework the following including incorporating;</p> <ul style="list-style-type: none"> • Detailed process for deregistration by the RPO • Detailed process registration by RPO • Detailed process for registration or notification from DB where not the RPO • Occupier Accounts and Where DB advises of Life support (Previous retailer is the RPO) • Provisions for escalation of enforcing security of sensitive customer data being transmitted through non secure networks and other potential mechanisms for transferring information (MIBB etc.) 	AEMO notes that Alinta Energy would have concerns about the adequacy of the existing process if the LSN / LSR adoption were not pursued.



Ref	Organisation	Feedback	AEMO's feedback
		The above is a high-level summary and we would be happy to discuss further however; we don't believe the industry guide currently outlines the next level of detail that is required in order to support the current issues we are seeing in the market.	
43	AusNet Services	In the first instance by 1 July 2020, AusNet Services will implement a tactical solution that leverages the Gas Life Support Industry Guide process. However, we are sceptical as whether this solution is fit for purpose in the long-term. If AEMO does not facilitate the adoption of LSN and LSR transactions, other options would need be investigated. One option is gas networks establishing joint business portal for each retailer to enter gas customer and life support details directly.	AEMO notes that AusNet Services would have concerns about the adequacy of the existing process if the LSN / LSR adoption were not pursued and would prospectively look to other solutions, like a joint business portal.
44	Australian Gas Networks	<p>If the LSN and LSR is not adopted, there would be no option other than the continuation of the existing manual email based process in place (now in NECF states and Vic).</p> <p>As noted above, this process is currently compromised by the lack of consistency in data/files received from the retailers. Unless all Retailers build their systems to meet the exact CSV file format requirements in the Gas Life Support Industry Guide, these problems will persist. It should also be noted that the Industry Guide has no regulatory head of power behind it to enforce compliance.</p> <p>Other than the B2B process, there are no other changes that could be implemented that would improve the process.</p>	AEMO notes that Australian Gas Networks would have concerns about the adequacy of the existing process if the LSN / LSR adoption were not pursued.
45	EnergyAustralia	EnergyAustralia will not make any changes to its current gas life support process if this change does not proceed. LSNs will continue to be delivered to distributors in an encrypted CSV file	AEMO notes that EnergyAustralia would not adopt alternative measures if the LSN / LSR adoption were not pursued.



Ref	Organisation	Feedback	AEMO's feedback
		via email. EnergyAustralia will continue to liaise directly with gas distributors to facilitate reconciliations.	
46	Jemena	JGN notes the Industry Guide is not mandatory and we will review our position if the LSN and LSR changes are not implemented.	AEMO notes that Jemena Gas Networks would prospectively look to other solutions if the LSN / LSR adoption were not pursued.
47	Momentum Energy	No, our organisation will continue to adhere to the Gas Life Support Industry Guide process.	AEMO notes that Momentum Energy would not adopt alternative measures if the LSN / LSR adoption were not pursued.
48	Multinet Gas Networks	Yes. MGN will still need to make changes to our database so that we can manage the information we receive via the manual CSV file to support the Life Support process. We need to implement a secure way to store this data. We also need to build functionality within our database to monitor and review, update and report on this data so that MGN can ensure compliance to this process. These system changes to our database would be quite significant and costly also.	AEMO notes that MGN would prospectively look to other solutions if the LSN / LSR adoption were not pursued.
49	Origin Energy	The existing CSV format is deemed to be fit for purpose in providing life support details. There would be a change in process only where the Distributor becomes the registration owner as they will be required to initiate the CSV and the retailer is the recipient. It is however expected that the majority of life support registrations will flow from Retailers to Distributor.	AEMO notes that Origin Energy would not adopt alternative measures if the LSN / LSR adoption were not pursued.



Ref	Organisation	Feedback	AEMO's feedback
50	Powershop	If AEMOP does not adopt a LSN or LSR Powershop will simply adhere to current manual procedures.	AEMO notes that Powershop would not adopt alternative measures if the LSN / LSR adoption were not pursued.
51	Red and Lumo Energy	[REDACTED]	AEMO notes that Red and Lumo Energy has redacted its full submission.
52	Simply Energy	We will not be looking to make any changes to the csv file format Industry Guide however depending on the jurisdiction, we would send the csv file to different gas distributors at different times, i.e. in VIC, DBs will receive the csv file upon successful completion of FRO transfer, whereas in NECF jurisdictions, DBs will receive the csv file as soon as customer notifies us, regardless of whether we're the prospective FRO or current FRO.	AEMO notes that Simply Energy would not adopt measures contrary to the industry guide if the LSN / LSR adoption were not pursued.



Please indicate your organisation's value rating if the proposal to adopt the LSN and LSR aseXML transactions proceeds, as compared with the status quo or the alternative(s) identified in Question 4. Please select one of the following.

Rating	Description
1 =	Large negative outcome if proposal proceeds
2 =	Moderate negative outcome if proposal proceeds
3 =	Small negative outcome if proposal proceeds
4 =	No net benefit or cost if proposal proceeds
5 =	Small positive outcome if proposal proceeds
6 =	Moderate positive outcome if proposal proceeds
7 =	Large positive outcome if proposal proceeds

Ref	Organisation	Feedback	AEMO's feedback
53	ActewAGL	7	AEMO acknowledges the value rating provided.
54	AGL	7	AEMO acknowledges the value rating provided.
55	Alinta Energy	7	AEMO acknowledges the value rating provided.
56	AusNet Services	7	AEMO acknowledges the value rating provided.
57	Australian Gas Networks	7	AEMO acknowledges the value rating provided.
58	EnergyAustralia	5	AEMO acknowledges the value rating provided.



Ref	Organisation	Feedback	AEMO's feedback
59	Momentum	5	AEMO acknowledges the value rating provided.
60	Jemena	7	AEMO acknowledges the value rating provided.
61	Multinet Gas Networks	6	AEMO acknowledges the value rating provided.
62	Origin Energy	1	AEMO acknowledges the value rating provided.
63	Powershop	[Not provided]	AEMO notes that Powershop did not provide a value rating.
64	Red and Lumo Energy	[REDACTED]	AEMO notes that Red and Lumo Energy has redacted its full submission.
65	Simply Energy	4	AEMO acknowledges the value rating provided.

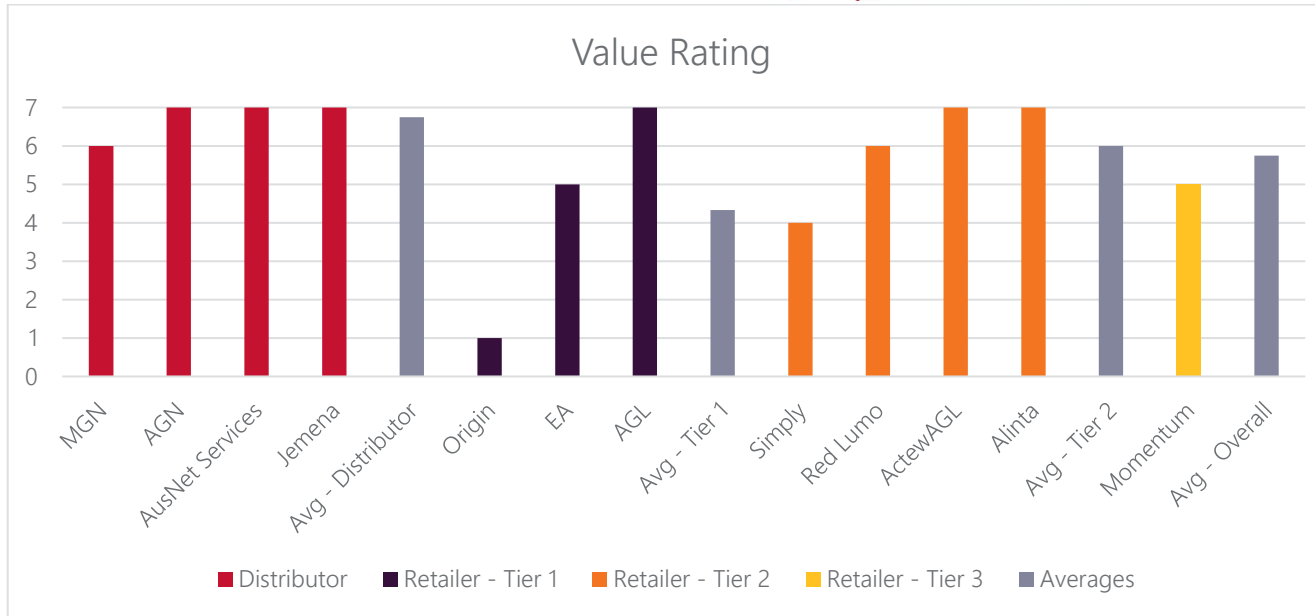


Figure 1 Value rating chart, by participant type



Does your organisation have any other comments that it wishes AEMO to consider in its formulation of the IIR?

Ref	Organisation	Feedback	AEMO's feedback
66	ActewAGL	ActewAGL's rationale is that any time we can leverage off an electricity market transaction to make the gas market more efficient, we should do so. Consistency across fuels and transactions reduces derogations, which tend to be a root cause of errors and mistakes. The life support space is critical and whilst the occurrence of life support equipment powered by gas may be extremely limited, minimizing any risk to life should be the highest priority.	AEMO notes ActewAGL's feedback.
67	AGL	AGL sees the current CSV process as a stop gap measure due to its limited application and lack of auditability. AGL believes that a more robust process is required for this activity.	AEMO notes AGL's feedback.
68	Australian Gas Networks	It is critical to AGN that the B2B solution is implemented in Q4 2021. The high operating cost and compliance risk associated with the existing manual process is unacceptable in the long term. From our perspective, the manual process was only ever meant to be a stop gap solution from February 2019 until a future opportunity arose for the national harmonisation of life support registration requirements (including Victoria), which would enable the implementation of a nationwide B2B process for LS registrations across a single schema version. This opportunity is now in front of us as an industry.	AEMO notes AGN's feedback.



Ref	Organisation	Feedback	AEMO's feedback
		<p>In addition to the risk minimising benefits of the B2B solution, its implementation costs will ultimately be outweighed by the cost savings over time.</p> <p>AGN supports a Q4 2021 implementation date. We must stress however that all jurisdictions must be switched to R38 simultaneously on a common date. Our national systems cannot manage a staged switch over as it can only operate on a single schema.</p> <p>With regard to the SA/NSW transformation engine as noted by AEMO in PBP6, our planned scope of work for LSN/LSR only includes the generic Schema Version related transactions. Any transactions requiring Transaction Specific Transforms (not schema version related) are not in our planned scope of work, and the AEMO transformation process will need to continue to cater for these.</p> <p>APA only agreed to participate in the NARGP process on the basis that it could use existing SA transactions for the Wagga and Tamworth networks.</p>	
69	EnergyAustralia	<p><i>EnergyAustralia would prefer the CDN/CDR uplift to occur at the same time. We see a more positive benefit in combining the gas life support and CDN uplift changes.</i></p> <p><i>Due to cost of implementation and small volumes of gas life support registrations the net benefit of this change on its own is low.</i></p>	AEMO notes EnergyAustralia's feedback.
70	Momentum Energy	<p>Whilst the proposed changes provide marginal benefit to our organisation, we recognise that the change provides a greater benefit and assurance to affected market customers.</p>	AEMO notes Momentum Energy's feedback.



Ref	Organisation	Feedback	AEMO's feedback
71	Multinet Gas Networks	Multinet Gas Networks has concerns that if we are to now proceed with the implementation of the LSN/ LSR transactions, that the we would need at least 18 months to implement a project of this magnitude therefore Q3 2021 to deliver may not be achievable.	AEMO notes MGN's feedback.
72	Origin Energy	We would expect that a consolidated assessment to this questionnaire forms part of the IIR to enable participants to have an understanding of the overall value and cost to industry.	AEMO notes Origin Energy's feedback and notes that AEMO has included a consolidated assessment to this questionnaire as part of the IIR.
73	Powershop	Firstly, the value rating does not sufficiently capture our views. Our rating would be; Negligible business and customer benefit at great cost	AEMO notes Powershop's feedback and notes (as above) that this is contradicted by their feedback to the PPC.
74	Red and Lumo Energy	[REDACTED]	AEMO notes that Red and Lumo Energy has redacted its full submission.
75	Simply Energy	Simply Energy has assessed these transactions from a risk perspective, rather than from an operational expenditure perspective, and while there is little to no tangible benefit by introducing these transactions, we support the change with a view that it reduces manual error and provides structured information to the market participants to provide relevant customer protections.	AEMO notes Simply Energy's feedback.