

## IN003/20 – Gas Life Support Supplementary Questionnaire

Responses to be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au) by due **COB 31 March 2020**.

Review comments submitted by: **ActewAGL Retail**

Date: **30 March 2020**

Contact Person: **Kate Goatley or Collette Reedy**

Topic	Please Provide Response Here
<b>Question 1 – Benefits of change</b>	
<p>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.</p>	<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"> <li>• Automated processes require less manual intervention, therefore reducing resourcing requirements through lessened Average Handling Time</li> <li>• Reduction of errors related to manual intervention</li> <li>• The simplification of training and procedures requiring little if any, tailoring for each fuel</li> <li>• Reduced requirement for specialised “Life Support” staff</li> <li>• Reduction of cost associated with maintaining separate Life Support related IT code for each fuel</li> </ul>

	<ul style="list-style-type: none"> <li>• Timeframes around the delivery of transactions will be significantly increased</li> <li>• Increased capacity for transaction volumes</li> </ul> <p>From the management of regulatory obligations perspective, the uniformity of the transfer of Life Support information will 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"> <li>• Increased confidence in the accuracy of life support information that is sent and received</li> <li>• Centralised (contained within one system) traceability for each transaction</li> <li>• Reduced risk associated with wrongful disconnection of life support customers.</li> <li>• The mitigation of Privacy issues resulting from the use of standardised transactions as opposed to email</li> </ul>
<b>Question 2 – Costs of change</b>	
<p>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.</p>	<p>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 <b>Low to Medium</b>.</p>
<b>Question 3 – Volume of gas life support customers</b>	
<p>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 deregistrations per month for your organisation, as well as any notes you would like to provide on how AEMO should interpret these data.</p>	<p>We have <b>102</b> current gas life support customers. We are unable to provide rates of registration and deregistration at this point in time.</p>
<b>Question 4 – Alternatives to LSN and LSR</b>	

<p>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.</p>	<p>No</p>
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**Question 5 – Value Rating (1-7)**

<p>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.</p> <table border="1"> <thead> <tr> <th>Rating</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>1 =</td> <td>Large negative outcome if proposal proceeds</td> </tr> <tr> <td>2 =</td> <td>Moderate negative outcome if proposal proceeds</td> </tr> <tr> <td>3 =</td> <td>Small negative outcome if proposal proceeds</td> </tr> <tr> <td>4 =</td> <td>No net benefit or cost if proposal proceeds</td> </tr> <tr> <td>5 =</td> <td>Small positive outcome if proposal proceeds</td> </tr> <tr> <td>6 =</td> <td>Moderate positive outcome if proposal proceeds</td> </tr> <tr> <td>7 =</td> <td>Large positive outcome if proposal proceeds</td> </tr> </tbody> </table>	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	<p>Value Rating</p>	<p>7</p>
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**Question 6 – Any other comments?**

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