

PPC response template for IN003/20 (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).

— Responses to be emailed to grcf@aemo.com.au by due **COB 14 February 2020**.

Review comments submitted by: *Australian Gas Networks*

Date: 17/2/20

Contact Person: *Rick Abbott*

Please complete sections 1 to 3. Section 4 is only required if your submission proposing further changes to the technical protocols.

Topic	Please Provide Response Here
Section 1 - Comments on the technical requirements and implementation date	
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	AGN agrees with the technical requirements, notwithstanding some comments and questions in the specific feedback below. 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. 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 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. 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.

Section 2 - Comments on the whether a net benefit will be realised should this initiative be implemented.	
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.	<u>Costs:</u> A high level estimate of LSN and LSR implementation costs is [REDACTED]. Multiple systems will be impacted. <u>Benefits:</u> <u>Risk Avoidance / Compliance Issues</u> • 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. <u>Cost Avoidance – FTEs</u> • 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. <u>Net Position:</u> Ultimately the implementation costs will be outweighed by the cost savings over time.
Section 3 - Feedback on any other matters described in the PPC.	

Sections 1 to 9 of the PPC sets out details of the proposal. Does your organisation support AEMO's assessment of the proposal? 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.	AGN generally supports AEMO's assessment.
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Section 4 - Feedback on the documentation changes described in Attachment C of the PPC.

Participants are to complete the relevant columns below in order to record their response.

Ref #1 – Participant Build Pack - Process Flow Table of Transactions

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
Participant Build Pack 1 - Process Flow Table of Transactions v3.6 'Elements' worksheet	Should the LS B2B elements be included in the 'Elements' worksheet?		

Participants are to complete the relevant columns below in order to record their response.

Ref #2 - Participant Build Pack 3 - Interface Definitions

Section #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
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 (e)	Clarification needed on "In the absence of relevant request"..... Is this related to 4.7.3 (b) absent?		
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. What were these used for in the guide? Are they needed?		

Participants are to complete the relevant columns below in order to record their response.

Ref #3 - Gas Interface Protocol - Victoria

Section #	Issue / Comment	Proposed text Red strik out means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Participants are to complete the relevant columns below in order to record their response.

Ref #4 - Gas Interface Protocol - Queensland

Section #	Issue / Comment	Proposed text Red strik out means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
Gas Interface Protocol (Queensland) version 21.0	Version release comments missing		

Participants are to complete the relevant columns below in order to record their response.

Ref #5 - Participants Build Pack 5 - The NSW/ACT specific Participant Build Pack 5.

Section #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Participants are to complete the relevant columns below in order to record their response.

Ref #6 - Participants Build Pack 6 - The NSW/ACT Wagga Wagga and Tamworth specific Participant Build Pack 6.

Section #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
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.		

Participants are to complete the relevant columns below in order to record their response.

Ref# 7 - Gas Interface Protocol – NSW/ACT

RMP clause #	Issue / Comment	Proposed text Red strik out means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Participants are to complete the relevant columns below in order to record their response.

Ref #8 - AEMO Specification Pack - FRC B2B System Interface Definitions.

Section #	Issue / Comment	Proposed text Red strik means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Participants are to complete the relevant columns below in order to record their response.

Ref #9 - AEMO Specification Pack- Specification Pack Usage Guidelines

Section #	Issue / Comment	Proposed text Red strik out means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)