

Date: 14 Feb 2020

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: AGL

Contact Person: Mark Riley

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 in	mplementation 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	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. The proposed timing of late 2021 is the most appropriate timing, given the other industry changes currently underway.

Topic	Please Provide Response Here		
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.	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. Note: Specific costing has yet to be done as this would change with other changes implemented – eg CDN/CDR. Overall benefits: • 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.		
Section 3 - Feedback on any other matters described in the PPC.			

Topic	Please Provide Response Here
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.	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).
	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.
	The specific schema which the gas industry moves to may be higher tan 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).
	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).

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 blue underline means insert	AEMO Response (AEMO only)		
	Information Correct				
	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.				

Participants are to	complete the relevant	columns below in order to	record their response.
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	Ref #2 - Participant Build Pack 3 - Interface Definitions			
Section #	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response (AEMO only)	
	Information correct.			

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 strikeout means delete and blue underline means insert	AEMO Response (AEMO only)		
	Noted – however see previous comment – AGL would expect this to be the latest available schema				

Ref #4 - Gas Interface Protocol - Queensland			
Section #	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response (AEMO only)
	Noted – however see previous comment – AGL would expect this to be the latest available schema		

Ref #5 - Participants Build Pack 5 - The NSW/ACT specific Participant Build Pack 5. Section # Issue / Comment Proposed text Red strikeout means delete and blue underline means insert Noted Noted 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 blue underline means insert	AEMO Response (AEMO only)		
	Noted				

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 strikeout means delete and blue underline means insert	AEMO Response (AEMO only)	
	Noted			

	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 strikeout means delete and blue underline means insert	AEMO Response (AEMO only)			
	Noted					

Ref #9 - AEMO Specification Pack- Specification Pack Usage Guidelines				
Section #	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response (AEMO only)	
	Noted – however see previous comment – AGL would expect this to be the latest available schema			