

Date: 14/02/2020

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: Jemena Gas Networks

Contact Person: Tim Sheridan

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	Jemena Gas Network (JGN) supports the proposed changes as outlined in this PPC. 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.
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	JGN believes the proposed changes will result in net long-term benefits for retailers and distributors. These benefits include: • 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

benefits, your feedback should provide an order of materiality for the costs.	
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.	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.