

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](mailto:grcf@aemo.com.au) by due **COB 14 February 2020**.

Review comments submitted by: *Simply Energy*

Date: 14 Feb 2020

Contact Person: *Aakash Sembey*

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	
<p>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</p>	<p>Simply Energy broadly agrees with the proposal for the following two items:</p> <ul style="list-style-type: none"> <li>- Implementation in Q4 2021, after 5ms go-live.</li> <li>- Supportive of LSN transaction to be added to the Gas markets (VIC, SA, NSW, QLD).</li> <li>- LSN should be allowed to be sent by incoming retailer prior to FRO completion (unlike CDN which can only be triggered on or after FRO completion).</li> <li>- 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).</li> </ul> <p>On the contrary, Simply Energy is <u>not supportive</u> of request transaction:</p>

	<ul style="list-style-type: none"> <li>- 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)</li> <li>- There is no Rules requirement for LSR (as the registered participant owner is supposed to provide life support data to the other party, be it network or retailer)</li> <li>- 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).</li> <li>- 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.</li> <li>- 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.</li> </ul>
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**Section 2 - Comments on the whether a net benefit will be realised should this initiative be implemented.**

<p>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.</p>	<p>Simply Energy believes that there are tangible (process improvement/efficiency based) and intangible (risk based) benefits of introducing LSN transaction because:</p> <ul style="list-style-type: none"> <li>- the current process of sending csv extract is manual and labour intensive</li> <li>- the current process is not real-time and poses a risk on compliance (potential breach situations)</li> <li>- 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.</li> </ul> <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</p>
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	<p>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>
<p><b>Section 3 - Feedback on any other matters described in the PPC</b></p>	
<p>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.</p>	<p>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.</p>

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 <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
82 and 83	Simply energy does not support LifeSupportRequest transaction to be added in PBP3		

\*\*\*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 <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
4.7.2	LifeSupportStatus should have the values of 'Registered' and 'Deregistered'	<p><u>LifeSupportStatus:</u></p> <ul style="list-style-type: none"> <li>• <u>Registered - No Medical Confirmation</u></li> <li>• <u>Registered - Medical Confirmation</u></li> <li>• <u>Deregistered - No Medical Confirmation</u></li> <li>• <u>Deregistered - Customer Advice</u></li> <li>• <u>Deregistered - No Customer Response</u></li> <li>• <u>None</u></li> </ul> <p><u>Notes regarding the allowable values</u></p> <p><u>"Registered - No Medical Confirmation" means the customer has advised the Retailer/Distributor that 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</u></p>	

		<p><a href="#">notified has received medical confirmation from the customer.</a></p> <p><a href="#">“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 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.</a></p> <p><a href="#">“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).</a></p> <p><a href="#">“Deregistered - No Customer Response” means, where a Distributor has registered a customer’s 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</a></p>	
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		<p><a href="#">premise as per the NERR, the Energy Retail Code (VIC), or the Gas Distribution Code (VIC).</a></p> <p><a href="#">"None" means that the premises doesn't have a current Life Support requirement.</a></p>	
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"> <li>• <a href="#">Oxygen Concentrator</a></li> <li>• <a href="#">Intermittent Peritoneal Dialysis Machine</a></li> <li>• <a href="#">Kidney Dialysis Machine</a></li> <li>• <a href="#">Chronic Positive Airways Pressure Respirator</a></li> <li>• <a href="#">Crigler Najjar Syndrome Phototherapy Equipment</a></li> <li>• <a href="#">Ventilator for Life Support</a></li> <li>• <a href="#">Other (as per AER guideline, this includes but not limited to)</a> <ul style="list-style-type: none"> <li>• <a href="#">external heart pumps</a></li> <li>• <a href="#">respirators (iron lung)</a></li> <li>• <a href="#">suction pumps (respiratory or gastric)</a></li> <li>• <a href="#">feeding pumps (kangaroo pump, or total parenteral nutrition)</a></li> <li>• <a href="#">insulin pumps</a></li> <li>• <a href="#">airbed vibrator</a></li> <li>• <a href="#">hot water</a></li> <li>• <a href="#">nebulizer, humidifiers or vaporizers</a></li> <li>• <a href="#">apnoea monitors</a></li> <li>• <a href="#">medically required heating and air conditioning</a></li> <li>• <a href="#">medically required refrigeration</a></li> </ul> </li> </ul>	

		<ul style="list-style-type: none"> <li>• <a href="#">powered wheelchair</a></li> </ul>	
4.7.2	DateRequired field should have the 'Usage' comments	<p>Suggested comments for 'DateRequired':</p> <p><a href="#">For a registration of Life Support, this date will be the date Life Support protections commence at the premises.</a></p> <p><a href="#">For a deregistration of Life Support, this date will be the date Life Support protection ceases to be provided at the premises.</a></p> <p><del>For response to a Life Support Request, this will be the effective date of the Life Support registration in the participants system.</del></p> <p><a href="#">Not required when LifeSupportStatus is None.</a></p>	
4.7.3	Do not support the inclusion of this section as per the comments above	Delete 4.7.3 in its entirety	
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><a href="#">Required if Reason is "Other"</a></p> <p><a href="#">Not required if Reason is</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Confirm Life Support</a></li> <li>• <a href="#">Data Quality Issue</a></li> <li>• <a href="#">No response to rejected LSN</a></li> <li>• <del>"Update"</del></li> <li>• <del>"Reconciliation"</del></li> </ul>	



\*\*\*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 <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No comment		

\*\*\*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 <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No comment		

\*\*\*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 <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
3	Do not support the following transaction changes: T82 and T83	<del>82 Life Support Request NC LifeSupportRequest</del> <del>83 Life Support Request NC LifeSupportRequest</del>	

\*\*\*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 <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No comment		

\*\*\*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 <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No comment		

\*\*\*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 <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
4.7	Simply Energy does not support LSR T82 and T83 and suggests its reference to be removed		
4.7	LifeSupportStatus should have the values of 'Registered' and 'Deregistered'	<p><u>LifeSupportStatus:</u></p> <ul style="list-style-type: none"> <li>• <u>Registered - No Medical Confirmation</u></li> <li>• <u>Registered - Medical Confirmation</u></li> <li>• <u>Deregistered - No Medical Confirmation</u></li> <li>• <u>Deregistered - Customer Advice</u></li> <li>• <u>Deregistered - No Customer Response</u></li> <li>• <u>None</u></li> </ul> <p><u>Notes regarding the allowable values</u></p> <p><u>"Registered - No Medical Confirmation" means the customer has advised the Retailer/Distributor that 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</u></p>	

		<p><u>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 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 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</u></p>	
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		<p><a href="#">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).</a></p> <p><a href="#">"None" means that the premises doesn't have a current Life Support requirement.</a></p>	
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4.7	DateRequired field should have the 'Usage' comments	<p>Suggested comments for 'DateRequired':</p> <p><a href="#">For a registration of Life Support, this date will be the date Life Support protections commence at the premises.</a></p> <p><a href="#">For a deregistration of Life Support, this date will be the date Life Support protection ceases to be provided at the premises.</a></p> <p><del>For response to a Life Support Request, this will be the effective date of the Life Support registration in the participants system.</del></p> <p><a href="#">Not required when LifeSupportStatus is None.</a></p>	
4.7	Do not support the inclusion of this section as per the comments above	Delete 4.7.3 in its entirety	
4.7	Moreover, the LSR transaction 'SpecialNotes' does not require reference to 'update' or 'reconciliation' in the comments.	<p>SpecialNotes suggested text:</p> <p><a href="#">Required if Reason is "Other"</a></p> <p><a href="#">Not required if Reason is</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Confirm Life Support</a></li> <li>• <a href="#">Data Quality Issue</a></li> <li>• <a href="#">No response to rejected LSN</a></li> <li>• <del>"Update"</del></li> <li>• <del>"Reconciliation"</del></li> </ul>	

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

Section #	Issue / Comment	Proposed text <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No comments		