

# Gas Life Support Industry Guide

Version 2

Date: 15 April 2020

**Note:** This document has been prepared through industry collaboration and provides guidance to gas participants to manage information exchange for Gas Life Support processes.

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# **Version Control**

Date	Description	Version No
19 Feb 2020	Final Version for publication	V 1.0
20 Feb 2020	Filename specification corrected	V1.1
26 Mar 2020	Update to De-Registration text and reference to AER Life Support Registration Guide	V2.0
	Reconciliation file name corrected from LNS to LSR	
	Additional information about the use of LSN reconciliation and Update usage included	

# **References**

- National Energy Retail Rules
- Victorian Energy Retail Code
- Victorian Electricity Distribution Code
- Victorian Gas Distribution Code

# **Glossary of Terms**

Item	Meaning
Initiator	Party who initiates the Registration, Registration update (and is the RPO) or the DeRegistration (which can be either party) Life Support Notice.
LS	Life Support
LSN	Life Support Notice
Recipient	The party who receives the Registration, Registration Update or DeRegistration Life Support Notice.
RPO	Registered Process Owner is the party the customer contacts and who is responsible for following up to obtain the Life Support Medical Confirmation. Can be either the Retailer or Distributor.
	The party nominated as RPO remains RPO for the whole Life Support process cycle.
NERR	National Energy Retail Rules
VGDC	Victorian Gas Distribution System Code
VERC	Victorian Energy Retail Code

# Introduction

## 1.1 Background

On 1 Feb 2019 new regulatory requirements were put in place to <u>register life support customers</u> in NERR states (SA, NSW, QLD, TAS). The AER confirmed that this includes gas life support.

On 15 December 2019, the ESCV also released an <u>initial determination</u> on changes to the Energy Retail Code and Gas Distribution System Codes to align protections in Victoria to the NERR. These changes will come into effect on **1 July 2020**.

To improve consistency between retailers and the DNSPs to manage gas life support customers the Gas Retail Consultative Forum (GRCF) agreed to develop a single industry guide for the management of gas life support customers to ensure a consistent and improved outcome for consumers. This guide is not an enforceable guideline, nor designed to provide guidance on how participants should comply with their regulatory obligations. It is up to each participant to interpret their regulatory obligations and implement accordingly.

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# **Life Support Process – General Information**

#### General

- 1. It is important to note this document is a "Guide" developed through industry consultation to standardize the management of Gas Life Support processes.
- 2. As this process uses CSV files transmitted by e-mail, rather than transactions with acknowledgements, there is an inherent risk in managing these customer Life Support registrations.
- 3. The Gas Life Support Process is a two way process, although it is expected that the majority of Life Support Registrations will flow from Retailers to Distributor.

# **Life Support Registration Status**

Within the Life Support Process there are various statuses, which are important in managing the ongoing customer registration/deregistration and possibly concessions.

The available statuses are:

- Registered No Medical Confirmation
- Registered Medical Confirmation
- Deregistered No Medical Confirmation
- Deregistered Customer Advice
- Deregistered No Customer Response
- None

Life Support Status	Definition
Registered - No Medical Confirmation	The customer has advised the Retailer/Distributor that they require life support equipment at the identified premise but have not yet provided a medical certificate to the notified Retailer or Distributor.
Registered - Medical Confirmation	The customer has advised the Retailer/Distributor that they require life support equipment at the identified premise and the notified Retailer/Distributor has received a medical certificate from the customer.
Deregistered - No Medical Confirmation	The Retailer/Distributor who was initially notified of the life support equipment has attempted to gain a medical certificate 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 and the customer did not provide the medical certificate during the deregistration process.
Deregistered - Customer Advice	Where a customer advises 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.

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Life Support Status	Definition
Deregistered - No Customer Response	Where a Distributor has registered a customer's premises on the advice of the previous Retailer, the Distributor can commence 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 premise.

# Registration Life Cycle

The general life cycle for a Life Support registration is:

- 1. The customer advises a party (Retailer or Distributor who becomes Registered Process Owner (RPO)) and transaction initiator.
- 2. Initiator sends LS pack to customer;
- 3. Initiator advises Recipient (likely the Distributor(s)) with a Life Support Notice (depending on whether LS Equipment is known);
  - a. At this point the registration is generally set with a status of 'Registered No Medical certificate';
- 4. RPO communicates with the customer until Medical Conformation is provided;
- 5. Depending on the provision of the Medical Confirmation, RPO provides an updated LSN
  - a. If no advice is eventually provided, and the party has followed the deregistration process, then the LSN will update to Status Deregistered;
  - b. If advice is provided for an electric device, then the Electricity Distributor will be updated with 'Registered Medical Confirmation' and the Gas Distributor with "DeRegistered No Medical Conformation'.

# **Life Support Registration Process**

The party who is initially contacted by the customer becomes the Registration Process Owner (**RPO**).

If the RPO is the Retailer, then the Life Support registration ends when the customer transfers to another retailer and that retailer completed the deregistration process, and it is the new retailer's responsibility to initiate registration with the customer.

If the RPO is the Distributor, then when the customer churns between Retailers the Distributor is responsible for advising the new retailer [NERR Cl 124B (2)(b), VGDC Cl. 4A.7(b)].

**Note**: the relevant party still has to complete the de-registration process as required by the NRR or VERC.

# **Registration process**

#### **Initial registration**

When the customer advises the initial Registered Party (either Retailer or Distributor) that party becomes the **RPO** who is responsible for:

- Registering the customer within their system;
- Issuing a customer pack, including the relevant Concession/Health Services forms if required;
- Initiating advice as the **Initiator** to the other registered participant (either Distributor or Retailer) who is the **Recipient** in the form of a CSV<sup>1</sup> Life Support Notice **(LSN)**.

The Initiator (and RPO for this customer) may either be the Financially Responsible Organisation (**FRO**), Prospective Retailer or Distribution Distributor.

#### Life Support Notice (LSN)

The csv LSN can be generated by the same triggers which generate the electricity aseXML LSN transaction. Generally, it is expected that in almost all cases the retailer will be the party contacted by the customer for Life Support Registration.

Associated with this csv file, a broad process has been agreed between participants, for retailers as the initiating party, to provide this CSV file to gas distributors and to trigger the file when there are changes to the data.

This process has no acknowledgement process other than the e-mail acknowledgement process.

#### **Updates to life support status or information**

When a party is advised of updates to the Life Support Status or other details (e.g. contact information), that party should advise the other registered participant of those changes.

During the registration process the RPO is the one likeliest to be advised of changes and would be responsible for advising the recipient.

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<sup>&</sup>lt;sup>1</sup> csv = Comma Separated Variable – See Appendix A for details of file structure

When the RPO is advised by the customer of updates to life support status (for example, medical confirmation is provided, or there are changes to contact information, or de-registration), the initiator a CSV LSN file with the updated information with a value of "Update".

#### Distributor Obligations when approached by Customer

Distributor businesses also have obligations to register a Life Support customer when initially approached by the customer. The LSN CSV file is bi-directional, and the Distributor should send LSN CSVs to retailers.

#### Distributor Obligations as Registered Process Owner

Distributors should note the obligations under NERR Cl 124B (2)(b) and Victorian Gas Distribution Code 4A.3.

When the Distributor has initially registered the Customer, they will identify themselves as the Registered Process Owner (RPO) when advising the retailer. In this case, then the customer transfers retailers, the Distributor as RPO is obligated to advise the new retailer of the Customer Life Support details.

If the Distributor is not registered as RPO, the Distributor has no obligation to advise the retailer of the customer Life Support details.

# **De-Registration Process**

#### **General Information**

Under the NERR and VERC and Vic Gas Distribution Code, either the Distributor or the Retailer may be contacted by the customer to advise of a change in circumstances. Either party may request an updated Medical Confirmation from the customer. Deregistration can only commence if the customer provides advice that Life Support is no longer needed. If no advice is provided, no action can be taken.

LSN de-registration follow the same process as the registration process, with the relevant Status Field changing from one of the Registered reasons to one of the DeRegistered reasons. A Life Support Notification .csv file is sent from the initiator to the Recipient.

The initiator of the de-registration must meet the relevant notification obligations under the respective codes and must complete the DeRegistration process prior to advising the other party.

#### Note:

- 1. It should be noted that NERR Cls 125(7) and 125(8) only allows the recipient to de-register a customer's premises, after the initiator has completed their deregistration process under the NERR Cl 124.
- 2. Unless the initiator is the RPO for the site, then during a Deregistration Process, the initiating party should not flag the transaction as RPO.

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# **Protection of Customer Data within the CSV Files**

# **Background**

At present, the LSN csv files are being shared between participants using e-mail, which has risks of data disclosure associated with sending and receiving customer information.

#### **Privacy Law**

Under the Privacy Act, participants must ensure that the information they are sending is protected.

#### **Data Protection**

General energy industry practice is for data files of this nature to be zipped using 7-Zip and encrypted with a password to ensure customer information is secured.

#### **Provision of Passwords**

Each participant will be required to share the password for the csv LSN file. Each participant's Life Support lead should send a separate e-mail to their counterparty (using the ROCL<sup>2</sup> for contact details) with the relevant password, in accordance with that businesses IT Security Policy.

To maintain a high level of security with customer data it is recommended that the passwords will be changed regularly, in accordance with that businesses IT Security Policy.

# **Reconciliation process**

## **Background**

Each business should undertake a reconciliation process between themselves and their counter party.

As the number of Medically Certified requirements for gas are substantially lower than for electricity, it is proposed that each gas Distributor and retailer Reconcile only every 6 months, although the cycle time is a matter between each retailer and Distributor.

This will minimise the number of certified sites requiring reconciliation and identify those where there should have been a status change during that period.

#### **Reconciliation Process**

Reconciliation should be to match MIRNS which have been flagged with a Life Support Requirements, not to manage individual customer Life Support information, such as phone numbers.

For reconciliation purposes, the Distributor should generate an <u>CSV</u> file and send it to the retailer for reconciliation.

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<sup>&</sup>lt;sup>2</sup> Retail Operations Contact List

The CSV file should contain all customers who meet the following criteria:

- MIRNS are for the FRO, <u>not</u> a prospective retailer;
   This includes currently flagged MIRNS and prospectively flagged MIRNS for the FRO;
- Customers registered (with or without Medical Confirmation) from the agreed date;

The CSV file should contain only the following fields:

- MIRN
- Life Support status

Retailers should use the reconciliation file to trigger the appropriate process to update their records and advise the Distributor of a status change via an updating LSN.

# **Poor or Incorrect Data**

#### **Process**

If a recipient receives poor or incorrect data, they can send an e-mail to the initiator indicating the cause of the query.

It should be noted that if specific data is being returned to the initiator then the recipient should consider whether the data needs to be encrypted.

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# Appendix A -Life Support Notice CSV File Format

#### **CSV File Delivery**

Unless otherwise agreed, each CSV file will be delivered as an encrypted zip file by e-mail.

#### **CSV File Name Convention**

Unless otherwise agreed, each CSV file will be named in accordance with the following file naming convention:

#### **Life Support Notification**

LSN\_[from participant]\_[date/time].csv

with date/time in the format of yyyymmddhhmmss

example: 'LSN\_AGL\_20191005171206'.

#### Reconciliation

LSR\_[from participant]\_[date/time].csv

with date/time in the format of yyyymmddhhmmss

example: 'LSR\_AGN\_20191005171206'

## **File Requirements**

Please note a couple of things that are essential to the success of our upload system:

- It is critical that the field names (column headings) in the CSV file are <u>exactly</u> as per the specifications.
- In the Life Support Status field (LIFESUPPORTSTATUS), only the 6 allowed values shown in the left-hand side of the table can be used.

#### **Business Requirements**

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The CSV specification shows fields as Mandatory (M) or Optional (O) as used within the gas industry. However, the associated business rule for the provision of data is that Optional fields must be filled if the sending party has received that information for the purposes of Life Support Registration. This aligns with the information provision obligations within the electricity LSN transaction, of providing all available data.

These fields have been marked as O [R]. O – Optional being the field characteristic, R – Required being the business obligation to provide that data if available when provided for Life Support Registration.

# **CSV Fields – Life Support Registration**

Unless otherwise agreed, each CSV file will contain the following fields and field names:

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value
MIRN	CHAR(10)	М	5330187090	MIRN
CHECKSUM	CHAR(1)	М	9	MIRN Checksum
FLATORUNITNUMBER	VARCHAR(7)	O [R]	283	Number
FLOORORLEVELTTYPE	VARCHAR(2)	O [R]	G	Number (alphanumeric) G,1,2,3
FLOORORLEVELNUMBER	VARCHAR(5)	O [R]	2	Number
BUILDINGORPROPERTYNAME	VARCHAR(30)	O [R]	R	
HOUSENUMBER	NUMERIC(5) in Range: 0 - 99999	O [R]	203	
HOUSENUMBERSUFFIX	VARCHAR(1)	O [R]		

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value
LOTNUMBER	VARCHAR(6)	O [R]		
STREETNAME	VARCHAR(30)	O [R]	John	
STREETTYPE	VARCHAR(4)	O [R]	ST	
LOCALITY	VARCHAR(30)	O [R]	Adelaide	
SITEADDRESSSTATE	VARCHAR(3)	O [R]	SA	
SITEADDRESSPOSTCODE	CHAR(4)	O [R]	5000	
SITEADDRESSDPID	NUMERIC(8) In Range: 10000000- 99999999	O [R]		
REASON	VARCHAR (14)	М	Update	Allowable Values:         Update – to be used when sending updated information         Reconciliation – to be used when responding to a DB reconciliation file (request)

Field Name	Type / Length	Mandatory / Optional / Required	Example		Allowable Value	
REGISTRATIONOWNER	YES/NO VARCHAR(3)	M/N	YES	the Life Support reg Not required where	oe used, where the Initiator of the LifeSuppor gistration process owner. e <i>LifeSupportStatus</i> is None. on owner is only the party who manages regis egistration.	
LIFESUPPORTSTATUS	VARCHAR (50)	M	REG_MC	Allowed Value  DEREG_CR  DEREG_NOCR  DEREG_NOMC  NONE  REG_MC  REG_NOMC	Description only used allowed value  Deregistered - Customer Advice  Deregistered - No Customer Response  Deregistered - No Medical Confirmation  None  Registered - Medical Confirmation  Registered - No Medical Confirmation	

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value
				Notes regarding the allowable values  "REG_NOMC" (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.  "REG_MC" (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 notified has received medical confirmation from the customer.

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value
				"DEREG_NOMC" (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 Electricity Distribution Code (VIC) and the customer did not provide medical confirmation during the deregistration process.  "DEREG_CR"(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 Electricity Distribution Code (VIC).  "DEREG_NOCR" (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 premise as per the NERR, the Energy Retail Code (VIC), or the Electricity Distribution Code (VIC).  "NONE" none means that the premise doesn't have a current Life Support requirement.

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value
DATEREQUIRED	DATE(8)	M/N	20201012	For a registration of Life Support, this date will be the date Life Support protections commence at the premises. For additional information, refer to clause 4.5(b).
				For a deregistration of Life Support, this date will be the date Life Support protection ceases to be provided at the premises.
				For response to a Life Support Request, this will be the effective date of the Life Support registration in the participants system.
				Not required when <i>LifeSupportStatus</i> is None.

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value
LSEQUIPMENT	VARCHAR(50)	O[R] /N	Oxygen Concentrator	<ul> <li>Allowable values:</li> <li>Oxygen Concentrator</li> <li>Intermittent Peritoneal Dialysis Machine</li> <li>Kidney Dialysis Machine</li> <li>Chronic Positive Airways Pressure Respirator</li> <li>Crigler Najjar Syndrome Phototherapy Equipment</li> <li>Ventilator For Life Support</li> <li>Other</li> <li>Other</li> <li>'Other' means an equipment that a registered medical practitioner certifies is required for a person residing at the customer's premises for life support and is not already listed above.</li> <li>Not required when LifeSupportStatus is</li> <li>Deregistered - No Medical Confirmation</li> <li>Deregistered - Customer Advice</li> <li>Deregistered - No Customer Response</li> <li>None</li> <li>Note: Where more than one allowable value is required, select one of the allowable values and provide the additional allowable value in the SpecialNotes field.</li> </ul>

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value	
LSCONTACTNAMETITLE	VARCHAR(12)	М	Miss	Must be the Title of the person who is the contact for the management of Life Support requirements.  Refer to B2B Procedure:Technical Delivery Specification.  Not required when <i>LifeSupportStatus</i> is  Deregistered - No Medical Confirmation  Deregistered - Customer Advice  Deregistered - No Customer Response  None	
LSCONTACTNAMEGIVEN	VARCHAR(40)	М	Mary	Must be the Given Name of the person who is the contact for the management of Life Support requirements.  Refer to B2B Procedure:Technical Delivery Specification.  Not required when <i>LifeSupportStatus</i> is  Deregistered - No Medical Confirmation  Deregistered - Customer Advice  Deregistered - No Customer Response  None	
LSCONTACTNAMEFAMILY	VARCHAR(40)	М	Smith	Must be the Family Name of the person who is the contact for the management of Life Support requirements.  Not required when LifeSupportStatus is  Deregistered - No Medical Confirmation  Deregistered - Customer Advice  Deregistered - No Customer Response  None	

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value
POSTALDELIVERYTYPE	VARCHAR(11)	O [R]	GPO BOX	
POSTALDELIVERYNUMBERPREF IX	VARCHAR(3)	O [R]		
POSTALDELIVERYNUMBERVAL UE	NUMERIC(5) in Range: 0 - 99999	O [R]	101	Number
POSTALDELIVERYSTREETNAME	VARCHAR(30)	O [R]	Service	
POSTALDELIVERYSTREETTYPE	VARCHAR(4)	O [R]	St	
POSTALDELIVERYLOCALITY	VARCHAR(46)	М	Adelaide	City
POSTALDELIVERYSTATE	VARCHAR(3)	O [R]	SA	State
POSTALADDRESSPOSTCODE	CHAR(4)	М	5000	PostCode

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value	
LSPHONENUMBER1	VARCHAR(15)	O [R]	0404 444 999	Phone Number	
SERVICETYPE	VARCHAR(12)	O [R]	Mobile Voice	Mobile Voice	
LSPHONENUMBER2	VARCHAR(15)	O [R]	8331 0194	Phone Number	
SERVICETYPE2	VARCHAR(12)	O [R]	Fixed Voice	Mobile Voice Fixed Voice TTY	
LSCONTACTEMAILADDRESS	VARCHAR(100	O [R]	MCSMITH@m yhealth.com.a u	Must be the email address of the person who is the contact for the management of Life Support requirements where the initiator has obtained Explicit Informed Consent for the use of the email address.  Not required when LifeSupportStatus is  Deregistered - No Medical Confirmation  Deregistered - Customer Advice  Deregistered - No Customer Response  None	
PREFERREDCONTACTMETHOD	VARCHAR (20)	O [R]	Email	Allowable values:  Postal Address  Site Address  Email Address  Phone	

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value	
SPECIALNOTES	VARCHAR (240)	O [R] / M	Not Applicable	Any additional information the Initiator wishes to convey to the Recipient.  Mandatory when <i>LSEquipment</i> is Other.	
LASTMODIFIEDDATETIME	DATETIME (12)	M	20201118102	Date and time that the record was updated in the Initiator's system	
COUNT	NUMERIC(8)	М	1	Count of records in file	

NOTE the intention of the count was to be provided at the end of the file for how many records are in the file, ie if 5 Life support registrations being sent by the retailer then the count would be 5.

# **CSV Fields – Life Support Reconciliation**

# Reconciliation

LSR\_[from participant]\_[date/time].csv

with date/time in the format of yyyymmddhhmmss

example: 'LSR\_AGN\_20191005171206'

Field Name	Mandatory / Type / Length Optional / Required		Example	Allowable Value	
MIRN	CHAR(10)	М	5330187090	MIRN	

Field Name	Type / Length	Mandatory / Optional / Required	Example	Allowable Value	
LIFESUPPORTSTATUS	VARCHAR (50)	М	REG_MC	Allowed Value	Description only used allowed value
				DEREG_CR	Deregistered - Customer Advice
				DEREG_NOCR	Deregistered - No Customer Response
				DEREG_NOMC	Deregistered - No Medical Confirmation
				NONE	None
				REG_MC	Registered - Medical Confirmation
				REG_NOMC	Registered - No Medical Confirmation
				customer has advis support equipmen provided medical of "REG_MC" (Regist has advised the Re equipment at the i	e allowable values gistered - No Medical Confirmation) means the sed the Retailer/Distributor that they require life t at the identified premise but have not yet confirmation to the Retailer or Distributor notified. ered - Medical Confirmation) means the customer tailer/Distributor that they require life support dentified premise and the Retailer/Distributor ed medical confirmation from the customer.