

PROPOSED PROCEDURE CHANGE (PPC)

Summary Section

Issue Number	IN003/20		
Impacted Jurisdiction(s)	NSW/ACT, QLD, SA, and VIC		
Proponent	Arjun Pathy	Company	AEMO
Proponent e-mail	arjun.pathy@aemo.com.au	Proponent phone #	03 9609 8983
Affected Gas Market(s)	<ul style="list-style-type: none">• Retail	Date proposal sent to AEMO	Tuesday, 17 September 2019
Short Issue Title	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.		
Other key contact information	grcf@aemo.com.au		

VERSION #	PRESENTED TO	DATE
1.0	GRCF	17 January 2020



PROPOSED PROCEDURE CHANGE (PPC)

1. DESCRIPTION OF ISSUE

1.1. NERR and ESC life support changes

In late 2017, the Australian Energy Market Commission (AEMC) introduced more stringent gas life support obligations in National Energy Customer Framework (NECF) jurisdictions. In response, the Information Exchange Committee (IEC), which is the governing body for business-to-business (B2B) procedures in the National Electricity Market (NEM) retail market, decided to adopt the two business-to-business (B2B) transactions to facilitate transmission of life support information between NEM participants: LifeSupportNotification (LSN) and LifeSupportRequest (LSR). These were included in the version r38 of the aseXML schema and have been in use by B2B participants in the NEM retail electricity market since 1 February 2019.

For NECF gas retail markets, participants elected to use an email process instead of aseXML transactions for the exchange of gas life support information.

In August 2019, the Essential Services Commission (ESC) announced that they were looking to adopt similar obligations to NECF jurisdictions in Victoria with, an effective date of 1 January 2020. In December 2019, the ESC published a final decision noting an effective date of 1 July 2020, with transitional arrangements applying from 3 February 2020¹.

1.2. 2019 GRCF work on life support

At a September 2019 Gas Retail Consultative Forum (GRCF) life support workshop, gas retail market participants generally agreed that, with Victoria's adoption of a similar regulatory framework to the NECF jurisdictions, the exchange of life support information via e-mail processes would become more challenging, making auditing of life support information exchange difficult, and increasing the risk of compliance breaches or wrongful disconnection of life support customers. As such, gas retail market participants broadly expressed that the electricity LSN and LSR transactions could present a more efficient method of fulfilling their regulatory obligations in a timely fashion.

As part of the GRCF's ongoing investigations into gas life support, AEMO conducted a survey of gas life support participants² to determine whether there was support for the adoption of the electricity LSN and LSR transactions and, if so, when.

The GRCF expressed near-unanimous support in this survey for adoption of the transactions. Most participants preferred to avoid the Q2 2021 window for implementation. The survey also revealed that participants supported the continued use of email processes to exchange life support information until the end of 2021.

The GRCF discussed the survey findings at the September GRCF meeting, where participants³:

- Supported AEMO's assessment that there is a potential net benefit to industry if the existing bilateral (email) processes for gas life support were replaced by two B2B life support transactions.

¹ Essential Services Commission, *Strengthening protections for life support customers – final decision*, 5 December 2019, [link](#)

² See Ref #9 in this meeting pack here: https://www.aemo.com.au/-/media/Files/Stakeholder_Consultation/Working_Groups/Retail_Meetings/GRCF/2019/GRCF-Meeting-131---17-September-2019---Meeting-Pack.zip

³ Draft minutes for this meeting have been distributed to the GRCF.



- Requested that AEMO provide advice on AEMO's capability, costs, and preference to implement a schema change in the period Q4 2020 – Q4 2021 (inclusive).
- Requested that AEMO commence a consultation in 2020 on the Technical Protocol⁴ (TP) changes.

1.3. Submission details and key feedback areas

This PPC is designed to:

- Confirm that the adoption of the LSN and LSR transactions would realise a net benefit across industry.
- Provide participants' advice on, requirements for, and preference to implement a schema change in the period noted in section 4 of this PPC.
- Provide AEMO's costs and likely industry costs and benefits for the adoption of the LSN and LSR transactions.
- Commence a consultation on the TP changes.

The changes described in this PPC requires moderate-to-large system changes for Retailers and Distributors. As such, AEMO seeks feedback from all Retailer and Distributors on the following:

1. Whether your organisation believes that this PPC accurately captures the technical requirements of the proposed change and whether your organisation supports the implementation date options that AEMO has put forward in section 3 of this PPC. If your organisation does not support all the proposed requirements, please provide details on which requirements specifically your organisation opposes and why.
2. Whether you expect that the benefits described in section 4 will outweigh the costs described in section 6 for your organisation. Your feedback should include:
 - Details of the benefits for your organisation.
 - Whether your organisation believes that the costs will outweigh the benefits.
 - An order of materiality for the costs for your organisation.
3. Feedback on any other matters described in the PPC.
4. Whether your organisation agrees with the marked-up changes to the TP described in Attachment C.

Feedback on this first stage consultation will close on 14 February 2020. To assist participants in preparing their feedback, AEMO is inviting participants to submit any questions and/or concerns they may have regarding this PPC or the proposed changes to grcf@aemo.com.au before COB (AEDT) 31 January 2020.

Should these questions and/or concerns raise issues that require broader discussion with participants, AEMO will convene a GRCF meeting on 6 February 2020 to discuss those issues. Otherwise, AEMO will respond to the questions and/or concern via e-mail by COB 6 February 2020.

To make a submission for this first stage consultation please use the response template provided in Attachment A. Submissions close COB (AEDT) 14 February 2020 and should be emailed to grcf@aemo.com.au.

⁴ Includes the Gas Interface Protocols that applies in VIC, QLD, and NSW/ACT as well as the AEMO Specification Pack that applies in SA.



2. REFERENCE DOCUMENTATION

2.1. Electricity B2B Procedure: Customer and Site Details Notification Process (final decision)

Click [here](#) to view the electricity B2B Procedure: Customer and Site Details Notification Process.

2.2. Technical Protocol (TP) documentation

Attachment B provides a detailed summary of the changes to each of the TP documents.

2.3. Schema Release documentations

Click [here](#) to view the index of Schema Releases from r28 to r38 inclusive.

3. OVERVIEW OF CHANGES

In order to align the gas life support solution with the life support solution implemented for electricity in February 2019, AEMO has used the LSN and LSR transaction information as described in sections 5.5 and 5.6 of the (electricity) B2B Procedure: Customer and Site Details Notification Process as the baseline to prepare the TP.

All Retailers and Distributors will need to make IT system changes, which will include incorporating the new LS transactions into gas retail market systems and modify gas gateways to send and receive r38⁵ transactions (see section 4 of the PPC for further information on IT system requirements).

The changes that AEMO will need to make include:

- The modification of the pre-production/certification environment responders to support r38 transactions.
- The modification of gas gateways to support sending and receiving r38 transactions.
- The deactivation of the aseXML schema transformation engine for Wagga Wagga and Tamworth networks.

As mentioned in section 1 of this PPC, a change of this nature will mean that all Retailers and Distributors that operate in NECF jurisdictions (that is, all AEMO gas retail jurisdictions except Western Australia) must migrate to schema version r38 concurrently. AEMO will therefore undertake a co-ordinated release program, which will include recertifying any modified transactions. For further details on the technical aspects of this change, please refer to section 4 of this PPC.

AEMO proposes a number of amendments to TP documents for IT systems changes needed to adopt the gas LSN and LSR transaction and uplift the aseXML schema version to r38. A summary of the proposed TP amendments is presented in Attachment B.

4. LIKELY IMPLEMENTATION REQUIREMENTS AND EFFECTS

Below is a summary of what AEMO envisages will be the impact on AEMO, Retailers, and Distributors. This change will not impact participants who fall into the Self Contracting User (SCU) registerable capacity under the National Gas Rules (NGR).

⁵ AEMO is aware that several potential schema changes are emerging that may target an implementation date in the period leading up to Q4 2021. However, AEMO notes that the adoption of schema version r38 fully meets requirements for this consultation; namely, it provides LSN and LSR transactions for gas retail market participants to exchange life support information. Any uplift past r38 to subsequent schema versions will be consulted on separately to ensure that any uplift to the subsequent schema version will be beneficial and that those benefits will outweigh any costs.



4.1. Effect on Retailers and Distributors

The implementation effect across industry will see a secure reliable system to managed LS information. For this to be achieved all Retailers and Distributors will need to make the following IT system changes:

- Modify gas gateways to send and receive transactions in aseXML schema version r38.
- Incorporate the gas LSN and LSR transactions into gas retail market systems.
- One month prior to the implementation date, complete a recertification process on all impacted transactions in accordance with process described in the Gas FRC B2B Connectivity Testing and System Certification⁶ document.

4.2. Effect on AEMO

4.2.1. FRC Hub changes

AEMO will need to ensure that r38 transactions can pass through the FRC Hub. For this to be achieved AEMO will need to make the following IT system changes:

- Modify AEMO's gas gateways (including those managed by CGI, AEMO's outsourced service provider for NSW/ACT and SA gateways) so they have the capability to send and receive r38 transactions. This includes reviewing and, if necessary, applying any changes that need to be made as a result of earlier schema version changes (See Section 2.3).
- Modify the pre-production/certification environment responders to support the r38 LSN and LSR transactions.
- Deactivate from production systems the aseXML schema transformation engine that currently transforms r29 to r34 and vice versa for transactions used in the Wagga Wagga and Tamworth networks.
- One month prior to the implementation date, complete a recertification process on all impacted transaction in accordance with process described in the Gas FRC B2B Connectivity Testing and System Certification⁸ document.

In addition to these technical changes, AEMO will prepare a schema manifest document that summaries each schema version change and will also facilitate the coordinated release program, as it has done for prior gas retail market aseXML schema uplift changes.

AEMO will provide this schema manifest document before Q3 2020 should AEMO decided to approve this change in early May 2020.

4.2.2. Implementation timeframes

In terms of an implementation timeframe, AEMO has completed a preliminary impact assessment which takes into account available resources and the timeframe for other major projects, such a Five-Minute Settlement (5MS) and proposed Embedded Network reforms. This impact assessment showed two implementation date options. The most practical option for AEMO and potentially participants is Q4 2021, with Q4 2020 as the secondary option. The key benefits of a Q4 2021 implementation date are that:

- The date is after the Five Minute Settlement implementation date.

⁶ The current published version of the Gas FRC B2B Connectivity Testing and System Certification document can be found clicking [here](#).



- The extended timeline allows a six-month window (expiring in late June 2020) in which participants may identify additional desirable modifications to the aseXML schema. These can then be bundled with the life support changes for a single aseXML uplift to take effect in Q4 2021.

5. IMPACT OF ISSUE NOT PROCEEDING

Should this proposal not proceed, gas retail market participants will need to continue to use manual processes to exchange gas life support information. As highlighted by participants in GRCF meetings, as volumes of gas life support customers increase, the use of manual processes will (in the long run) increase the risk of compliance breaches or wrongful disconnection of gas life support customers.

6. OVERALL COST, BENEFITS AND MAGNITUDE OF THE CHANGES

AEMO has deemed this change to material because of the change to IT systems and because of the industry coordination effort required to uplift the aseXML schema to schema version r38.

The estimated cost for AEMO to implement this change is \$250,000. This estimate includes the cost of implementing IT system changes as described in section 4 and the cost of drafting and consulting on TP documentation changes as described in section 9. There is no direct benefit for AEMO.

The estimate cost for Retailers and Distributors to implement this change will vary for each organisation and depend on several factors, including but not limited to the complexity of IT system changes for that organisation.

In terms of the likely benefits, the GRCF has noted that adopting the LSN and LSR transactions will have potential net benefits for all participants through efficiencies in, and auditability of life support information exchange.

In addition, the adoption of the LSN and LSR transactions avoids the risk impacts outlined in section 5.

7. CONSISTENCY WITH NATIONAL GAS RULES (NGR) AND NATIONAL GAS OBJECTIVE (NGO)

7.1. Consistency with National Gas Law (NGL) and NGR:

AEMO's view is that the proposed change is consistent with the NGL and NGR. AEMO also believes that this change is consistent with Part 7 of the National Energy Retail Rules (NERR), Part 7 of the Victorian Energy Retail Code, and section 4A of the Victorian Gas Distribution System Code.

7.2. National gas objective:

It is AEMO's view that this change would facilitate efficient operation of the retail gas market by providing a cost-effective solution allowing Retailers and Distributors to fulfil their life support regulatory obligations in a timely fashion.

7.3. Applicable access arrangements:

AEMO's view is that the proposed change is not in conflict with existing Access Arrangements.

8. SUPPORTING DOCUMENTATION

Please refer to section 2 and Attachment D, which includes documents that formed part of the 2011/2012 aseXML schema release. This was the most recent time that the gas retail market implemented a schema uplift.



9. PROPOSED TIMELINES

To achieve an AEMO Decision by Q2 2020, the following timeline will take effect:

- Issue Proposed Procedure Change (PPC) on Friday 17 January 2020.
- Submission on PPC closes Friday 14 February 2020.
- Issue Impact and Implementation Report (IIR) on Tuesday 10 March 2020.
- Submissions on IIR close Tuesday 7 April 2020.
- Publish Notice of Decision Friday 1 May 2020.

For a Q4 2021 implementation date, AEMO will:

- Publish a notice of effective date no later than Wednesday 31 March 2021⁷.
- Target an effective date of Q4 2021.

For a Q4 2020 implementation date, AEMO will:

- Publish a notice of effective date with the notice of decision on Friday 1 May 2020.

⁷ This date has been chosen to allow time for any additional changes to be incorporated in a aseXML schema uplift beyond r38. Formal consultation on those additional changes must have commenced by 1 June 2020 to be considered as part of the Q4 2021 implementation date.



ATTACHMENT A – PPC RESPONSE TEMPLATE

The PPC response template has been attached separately to this document. There are four sections in the template:

- Section 1 seeks feedback on the technical requirements and implementation date.
- Section 2 seeks feedback on whether the benefits outweigh the costs.
- Section 3 seeks feedback on any other matters described in the PPC.
- Section 4 seeks feedback on the marked-up changes to the TP described in Attachments C.

Anyone wishing to make a submission for this first stage consultation are to use this response template. Submissions close 14 February 2020 and should be emailed to grcf@aemo.com.au.



ATTACHMENT B – TECHNICAL PROTOCOL REFERENCE DOCUMENTATION (SEE SECTION 2)

The following table lists Technical Protocol (TP) documents that need to be amended. The table also in a summary of the changes. Attachment C contains a draft version of the TP showing tracked changes between the current version and the proposed changes.

Ref#	Title of document and any notes.	Current Ver #	Summary of the change
Victoria			
1	Participant Build Pack 1 - Table of Transactions, Table of Elements, List of Job Enquiry Codes, Address Elements and MIRN and Meter states. Marked up showing differences between current version.	3.5	1. Add the LS transactions (80, 81, 82 and 83) to the Process Flow Table tab.
2	Participant Build Pack 3 - Interface Definitions Marked up showing differences between current version.	3.6	1. Add a new section (4.7 – Life Support Information) that contains: <ul style="list-style-type: none"> • A general overview explaining the purpose of the transactions. • The specific fields within the transactions. • Details of when a field is required. 2. Update Appendix A (Data Dictionary) to include the new LS aseXML element names.
3	Gas Interface Protocol – Victoria Marked up showing differences between current version.	21.0	1. Update the version number for the changed artefacts mentioned above. 2. Update the aseXML schema version to r38, to which participants will subscribe for Victorian gas retail market systems.
Queensland			
4	Gas Interface Protocol – QLD	20.0	1. Update the version number for the changed artefacts mentioned above.



PROPOSED PROCEDURE CHANGE (PPC)
IN003/20: ADOPTION OF LSN AND LSR TRANSACTIONS FOR GAS LIFE SUPPORT



Ref#	Title of document and any notes.	Current Ver #	Summary of the change
	Marked up showing differences between current version		2. Update the aseXML schema version to r38, to which participants will subscribe for Queensland gas retail market systems.
NSW/ACT			
5	NSW/ACT specific Participant Build Pack 5 Marked up showing differences between current version	5.0	1. Update section 3 (Transaction Changes) to include LSN and LSR transactions (80, 81, 82 and 83). The update includes that they are flagged as “No change” (NC), meaning that technical details within the Victorian Participant Build Pack applies for life support.
6	NSW/ACT Wagga Wagga and Tamworth specific Participant Build Pack 6 Marked up showing differences between current version	3.0	1. Update section 2 and other relevant sections by removing reference to the FRC HUB transformation process. This process will be dismantled, since the aseXML schema version for NSW/ACT and SA will be the same (i.e. schema version r38).
7	Gas Interface Protocol – NSW/ACT Marked up showing differences between current version	9.0	1. Update the version number for the changed artefacts mentioned above. 2. Update the aseXML schema version to r38, to which participants will subscribe for NSW/ACT gas retail market systems.
South Australia			
8	AEMO Specification Pack - FRC B2B System Interface Definitions Marked up showing differences between current version	4.6	1. Add a new section (4.7 – Life Support Information) that contains: <ul style="list-style-type: none"> • General overview explaining the purpose of the transaction. • The specific fields within the transactions. • Details of when a field is required. 2. Update Appendix A (Data Dictionary) to include the new life support aseXML element names



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Ref#	Title of document and any notes.	Current Ver #	Summary of the change
9	AEMO Specification Pack- Specification Pack Usage Guidelines Marked up showing differences between current version	8.1	<ol style="list-style-type: none">1. Update the version number for the changed artefacts mentioned above.2. Update the aseXML schema version to r38, to which participants will subscribe for SA gas retail market systems.



ATTACHMENT C – DOCUMENTATION CHANGES (SEE SECTION 3)

Draft versions of the technical protocols showing tracked changes between the current version and the proposed changes are attached separately to this document.



ATTACHMENT D – 2011/2012 ASEXML RELEASE DOCUMENTATION

The following, which are attached separately to this document, are reference documents that formed part of the 2011/2012 aseXML release:

- Industry workshop presentation slides.
- aseXML manifest.
- Testing scope.
- Working group terms of reference.
- Implementation Plan.

Participants should review these reference documents as a guide to assess the overall impact of this change.