

## IN003/20 – Gas Life Support Supplementary Questionnaire

Responses to be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au) by due **COB 31 March 2020**.

Review comments submitted by: *Simply Energy*

Date: 31 March 2020

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| Topic   | Please Provide Response Here   |
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| <b>Question 1 – Benefits of change</b>  |  |
| <p>Please provide, in detail, what benefits the change will have on your organisation (in terms of efficiency, customer benefits, privacy, etc.). If any monetary benefits are provided (e.g. in terms of annual FTE savings), these will be kept confidential.</p>   | <p>Simply Energy believes that there are tangible (process improvement/efficiency based) and intangible (risk based) benefits of introducing LSN/LSR transactions 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> |
| <b>Question 2 – Costs of change</b>   |  |
| <p>Please provide what costs the change will create for your organisation as an order of magnitude (i.e. "low", "medium", or "high"). If any monetary values (e.g. once-off implementation costs, and any ongoing annual cost) are provided (e.g. in terms of the cost of system changes), these will be kept confidential.</p> | <p>Medium impact</p> <p>[REDACTED]</p>   |
| <b>Question 3 – Volume of gas life support customers</b>  |  |

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| <p>Please provide the volume of gas life support customers your organisation currently has registered. Please also provide the average rate of gas life support registrations and deregistrations per month for your organisation, as well as any notes you would like to provide on how AEMO should interpret these data.</p> | <p>Total volume of Gas life support customers is in the range of 2000, exact numbers can be provided later however we've been unable to run an extract due to other priorities.</p> <p>Rate of increase<br/> 10-15/week for VIC (aggregated for all three VIC DBs)<br/> 1-2/week for NSW<br/> 2-3/week for SA</p> <p>The number of LS customers depends on the market share.</p> |
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**Question 4 – Alternatives to LSN and LSR**

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| <p>If AEMO decides not to recommend the adoption of LSN and LSR, will your organisation likely make any changes to your existing implementation of the Gas Life Support Industry Guide process?. If so, provide details on the type of changes you intend to put forward.</p> | <p>We will not be looking to make any changes to the csv file format Industry Guide however depending on the jurisdiction, we would send the csv file to different gas distributors at different times, i.e. in VIC, DBs will receive the csv file upon successful completion of FRO transfer, whereas in NECF jurisdictions, DBs will receive the csv file as soon as customer notifies us, regardless of whether we're the prospective FRO or current FRO.</p> |
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**Question 5 – Value Rating (1-7)**

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| <p>Please indicate your organisation's value rating if the proposal to adopt the LSN and LSR aseXML transactions proceeds, as compared with the status quo or the alternative(s) identified in Question 4. Please select one of the following.</p> | <p>4</p> | <p>No net benefit or cost if proposal proceeds</p> |
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| Rating | Description                                    |
|--------|--|
| 1 =    | Large negative outcome if proposal proceeds    |
| 2 =    | Moderate negative outcome if proposal proceeds |
| 3 =    | Small negative outcome if proposal proceeds    |
| 4 =    | No net benefit or cost if proposal proceeds    |
| 5 =    | Small positive outcome if proposal proceeds    |

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| 6 =   | Moderate positive outcome if proposal proceeds |  |  |
| 7 =   | Large positive outcome if proposal proceeds    |  |  |
| <b>Question 6 – Any other comments?</b>   |  |  |  |
| Does your organisation have any other comments that it wishes AEMO to consider in its formulation of the IIR? |  | <i>Simply Energy has assessed these transactions from a risk perspective, rather than from an operational expenditure perspective, and while there is little to no tangible benefit by introducing these transactions, we support the change with a view that it reduces manual error and provides structured information to the market participants to provide relevant customer protections.</i> |  |