18 December 2017



Dr Bronwyn Evans Chief Executive Officer Standards Australia Level 9, The Exchange Centre 20 Bridge Street Sydney NSW 2001

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### Dear Bronwyn

Gas Energy Australia (GEA) is pleased to provide feedback on the Review of Technical Governance - Initial Report of Consultation. Gas Energy Australia is supportive of the focus areas in general and offers the following suggestions to improve the outcome of the review.

#### Development work program

The Development work program is a focus area which rightly includes "Multiple pathways for project approval". GEA suggests that this focus area be expanded beyond the pathway to include variations in project approvals. For example, if issues or amendments are minor in nature, they could be held in a work pool and grouped together to form a body of work or "substantive project" which would then be passed through the project approval process.

This would be a better process than having such issues or amendments clog up the project approval process, and then need to be resubmitted multiple times before they can be actioned.

GEA recommends this change be implemented by amending the development work program focus area to include this scope and signal it with the following wording "*Multiple pathways with appropriate project approval processes*"

# Committee structure and performance

GEA observes that the focus areas on committee structure and performance look inwardly at the process, but when stepping back the external actions and responsibilities of the nominating organisation shape the committees. GEA suggests that these factors need to be integral to the review. This further reinforces GEA's previous recommendation to the Technical Governance Review that nominating organisations should be given greater visibility and information **as well as accountability**.

GEA recommends that the Committee structure and performance focus area be renamed to **Nomination, Committee Structure and Performance,** to ensure that the governance process captures the nomination of committee members.

# Digital transformation

As a final observation, GEA notes the digital transformation project preparing to meet the future delivery pathways for standards and the technical governance review both have significant implications for the future development and distribution of standards. As a result, GEA considers it is time to consider what our product "a standard" is now and what it might be in the future.

GEA expects that the 300 page document which is the "standard" of today will not be relevant beyond a history lesson in the future. GEA considers the insights and intelligence gained from the digital transformation project and the technical governance review places Standards Australia in a strong position to ask the next question which is what is a "standard" for the next generation and how do we get there.

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#### Closing comment

GEA welcomes the opportunity to further discuss this submission and looks forward to working with Standards Australia to improve the technical governance of the current standards development process.

For your consideration.

Yours sincerely

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John Griffiths Chief Executive Officer