



South East Australia Gas Pty Ltd as agent for and
on behalf of the SEA Gas Partnership

Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Level 4, 70 Hindmarsh Square
Adelaide, SA 5000
GPO Box 2666
Adelaide SA 5001
ABN: 73 096 437 900

TAX INVOICE

Tel: 08 8236 6800
Fax: 08 8236 6899
Email: accounts@seagas.com.au

Invoice No: IN000155
Date: 26/07/2019
Debtor Id: 10007

Page : 1 of 1

Description	Amount excl. GST	GST	Amount
MOS allocation cost for financial year 30 June 2019	\$25,021.00	\$2,502.10	\$27,523.10
Total Amount Payable: (AUD)	\$25,021.00	\$2,502.10	\$27,523.10
	Payment Due Date		5/08/2019

Please make payment on or before 5/08/2019

Bank: ANZ
BSB: 012-950
Account: 837172728

Please email your remittance to accounts@seagas.com.au.

Invoice No: IN000155
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GST: \$2,502.10
Amount: (AUD) \$27,523.10



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26 July 2019

Sandra Chui
Chief Finance Officer
Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Dear Sandra

Re: SEA Gas MOS allocation service costs for the year ending 30 June 2019 (MOS Costs)

As you know the introduction of the Short-Term Trading Market (STTM) has increased pipeline obligations for reporting of data. SEA Gas has made a number of changes to accommodate these requirements and has made no other recovery of the Market Operator Service (MOS) Costs listed below.

SEA Gas can identify some costs directly related to MOS Allocations. These costs have been allocated 100% to MOS Costs. For other costs indirectly related to MOS Allocation requirements SEA Gas has made an allocation proportional of MOS Allocation files to the total number of files submitted for the STTM. During the last financial year SEA Gas submitted 4,478 STTM files. 2,055 (46%) of those files were MOS Allocation files. Therefore, SEA Gas has allocated 46% of the indirect costs to MOS Costs.

SEA Gas had forecast estimated MOS Costs for the financial year ending 30 June 2019 (FY19) at \$40,000. With completion of FY19, MOS Costs incurred have been determined as \$25,021.

Consistent with last year's account please be advised that the invoice for SEA Gas' FY19 MOS Costs includes the following:

1. External Service Provider costs
 - a. Previously, SEA Gas instigated after hours support from its IT service provider to assist with Short Term Trading Market (STTM) compliance. For FY19, \$3,589 has been allocated to MOS Costs representing 46% of the cost incurred attributable to the STTM.
 - b. For FY19, the External Service Provider was not required to perform any business hours support on STTM related matters. Therefore, the MOS Cost share of this work is \$0.

2. Internal Labour costs
 - a. From SEA Gas timesheet records, effort was required to manage shipper CRN expiry issues; invalid MOS stack submissions and deal with other specific MOS matters. The costs attributable include direct and indirect MOS costs (46% of the indirect costs were charged to MOS Costs). The allocation to MOS Costs is \$12,592.

- b. SEA Gas notes the on-going monitoring required of STTM and MOS Allocation data. Consistent with the previous year SEA Gas estimates that the day to management of MOS obligations outside of the specific matters listed above costs \$8,840 (for 52 hours per annum).
- 3. On this occasion, we have chosen not to add an interest cost for the time differential between when costs are incurred and the expected time of recovery.

SEA Gas' MOS Costs are summarised as follows.

Source	Description	Cost
External Service Provider	After Hours Support	\$3,589
	Business Hours Support	\$0
Internal Labour Costs	Internal Analysis	\$12,592
	On-going monitoring	\$8,840
Total		\$25,021

If you have any questions on this matter, please contact John Kupke (Operations Analyst) at john.kupke@seagas.com.au.

Kind regards



John Kupke
Operations Analyst

Our reference: COM.16.015