

Re: Consultation on Proposed Amendments to BB Procedures and BB Data Submission Procedures – Lochard Energy Feedback

Lochard Energy (Lochard) is the owner and operator of the Iona Underground Gas Storage (IUGS) in Port Campbell, Victoria. Lochard welcomes the opportunity to provide feedback to the above consultation.

Lochard's feedback sets in the context that IUGS is an existing BB Storage Facility. The facility includes the compressors that perform storage injection and withdrawals functions in connection with the interconnecting pipelines. Under the legal and regulatory framework to be introduced for the capacity trading reform package, the same compressors within the IUGS will also be categorised as BB Compression Service Facility.

Therefore, Lochard's feedback focuses on the need to simplify the reporting and data requirements for the overlapping roles of the facility. For Lochard as a BB Storage Facility and BB Compression Service Facility, vast majority of the data and procedures are the same. The same situation also applies to the role of BB allocation agent, allocation points, and methodology.

Lochard is concerned that the separate requirements for registration and publishing data as a BB compression service facility, which essentially replicates the data published under the BB Storage facility, creates unnecessary costs for system and administration. Lochard enquires whether simplification can be incorporated in the procedures and systems to cater for the overlapping facility roles.

Lochard also proposes that AEMO host stakeholder sessions in the change process that enables better understanding and application of rule and procedures to a specific facility.

Should you have any questions relating to Lochard's submission, please feel free to contact myself on 0427 056 692.