



Retail Energy Market Company

Apparent breach by APT Facilities Management of: Rule 188(3) on gas day 29/03/16; and Rule 197(2) on gas day 06/04/16.

Overview:

APT Facilities Management ("APTFM") had two compliance matters with the Retail Market Rules in late March and early April 2016:

- (1) APTFM provided user's pipeline nomination amount ("UPNA") and user's allocation instructions ("UAI") files on 29/02/16 for gas day 29/03/16 for the Parmelia Pipeline. APTFM revised their UAI on 13/03/16 and the revised UAI did not include an allocation for the Parmelia Pipeline. This appears to be a breach by APTFM of Rule 188(3).
- (2) APTFM nominations for gas day 06/04/16 did not have a UPNA. This appears to be a breach of Rule 197(2).

Rules 188(3) and 197(2) are as follows:

188. User's allocation instruction

...

- (3) *An allocation instruction must specify for each gas day to which it applies how the user's gas injections into the sub-network, other than the user's swing service repayment quantities, are to be allocated between the shippers injecting gas into the sub-network on the user's behalf.*

197. User's pipeline nomination amount

...

- (2) *For each gas day for each gate point, at least 18 hours before the start of the gas day, a user must notify REMCo of the user's pipeline nomination amount for the gate point.*

Impact:

This caused a 799 GJ Swing Service spike for gas day 29/03/2016 and for gas day 06/04/16.

Resolution:

APTFM manually submitted its nominations on 13/03/16 and 06/04/16, and it appears that errors occurred with nominations on weekends or public holidays.

Proposed Further Actions:

APTFM has a manual nomination system (with CSV files being uploaded to GRMS), and will apply increased due diligence on weekends and public holidays are submitted properly going forward.

Invitation for submissions:

Before determining whether any further action is required, REMCo invites written submissions from participants as to:

- the effect that this incident has on their operations, and
- their view with regard to the determination, if any, REMCo should make under Rule 329 in respect of the apparent Rule breaches.

Submissions are requested by no later than 5pm (AEST) **Wednesday 04 May 2016**. Submissions should be sent by e-mail to remco_administration@aemo.com.au.

Alternatively, submissions can be sent by post to REMCo at:

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If you have any questions regarding this matter, please contact Yee Yeng Lambropoulos on (02) 8884 5032.

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