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To Whom it May Concern,

**Re: BB Procedures version 9.0**

Jemena welcomes the opportunity to provide a submission to the Australian Energy Market Operator (**AEMO**) on the Amendments to BB Procedures arising from the implementation of the pipeline capacity trading reforms.

We note that publication of the National Gas Rules (**NGR**) that underpins the need for amendment to the procedures has yet to be made public, as such, it is difficult for Jemena to comment fully on whether the procedures reflect the changes to the NGR. In providing feedback, Jemena has relied on the Gas Market Reforms Consultation Draft from March 2018, in doing so we have the following observations.

Section 7.2A (f) requires the name, phone and email details of a person with regard to allocation agreements. Whilst we acknowledge that the NGR also makes reference to a "person", from a practical sense there are number of individuals within a dedicated customer service team at Jemena that will assist shippers with allocation agreements. A shared email and phone number that directs shippers to those that can assist is preferred to ensure the fastest possible resolution to enquires.

Section 9.1.1(xviii) refers to the publication of the details of secondary capacity transactions. The details listed seem to match draft rule 190A which is the information that parties to a bilateral secondary trade (i.e. the seller and/or the buyer) need to disclose, however, there is no corresponding text in either section 7 or 8 requiring the parties to provide this information to AEMO.

Jemena looks forward to working with AEMO in progressing the implementation of the pipeline capacity trading reforms. Throughout this process Jemena may provide further feedback on the procedures. Should you have any further questions, please contact me on 0403 156 491 or [andrew.zancanaro@jemena.com.au](mailto:andrew.zancanaro@jemena.com.au).

Yours sincerely



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