

NOTICE OF DECISION (NOD)

Summary Section

Issue number	N/A		
Impacted jurisdiction(s)	Wholesale Gas Market		
Proponent	AEMO	Company	AEMO 0422 572 874
Affected gas market(s)	GBB GSOO	Consultation process (ordinary or expedited)	Ordinary
Industry consultative forum(s) used	GWCF	Date industry consultative forum(s) consultation concluded	Friday, 12 August 2022
Short description of change(s)	Gas Transparency Measures		
Procedure(s) or documentation impacted	Gas Statement of Opportunities (GSOO) Procedures Bulletin Board (BB) Procedures BB Data Submission Guide Guide to GBB Reports BB Aggregation Methodology Application for Registration form – GBB and Part 24 and the supporting Application Guide GBB Facility Registration Form and the supporting Application Guide		
Summary of the change(s)	The changes contained in and attached to this Notice of Decision (NoD) involve creating the Gas Statement of Opportunities (GSOO) Procedures and amending the Gas Bulletin Board (GBB) Procedures to take into account the National Gas Amendment (Market Transparency) Rule 2022.		
IIR prepared by	Jordan Daly	Approved by	Meghan Bibby
Date IIR published	25 August 2022	Date consultation concludes	26 September 2022
Email address for responses	gwcf_correspondence@aemo.com.au		

NOTICE OF DECISION

1. DESCRIPTION OF ISSUE

1.1. Background

Energy Ministers endorsed the Gas Transparency Measures legislative and regulatory reform package in March 2020 and industry consultation on proposed amendments occurred across late 2020 and early 2021. The gas transparency measures address information gaps and asymmetries relating to gas and infrastructure prices, supply and availability of gas, gas demand, and infrastructure used to supply gas to end-markets. For further information, please see:

- The AEMC's page on [Gas rules made by the South Australian Minister](#). The Rule itself is available [here](#).
- The Department of Climate Change, Energy, the Environment and Water's page on [Regulatory amendments to increase transparency in the gas market](#).

Key elements of the legislative and regulatory reform package include:

- The Natural Gas Services Bulletin Board (BB) provisions have been expanded to require information from new categories of reporting entities and expanded the information to be provided.
- The Gas Statement of Opportunities (GSOO) process has been strengthened to allow AEMO to conduct mandatory GSOO surveys and provide for AEMO to make new GSOO procedures to support the GSOO survey process.
- A new function for the Australian Energy Regulator (AER) to publish information about prices in gas markets and new powers to collect the information.
- A new function for the AER to monitor and review the performance of gas markets and provide advice on gas market performance to Ministers or AEMC.

The final rule made by the SA Energy Minister provides for a staggered implementation, with the rule taking full effect by 14 April 2023. AEMO has progressed system changes for extended BB rules which commence on 15 December 2022. This Notice of Decision marks the end of AEMO's consultation on the revised procedures. For further information on the consultation and implementation timing, please see section 10 of this document.

1.2. Summary of the issue

Reviews carried out by the Australian Competition & Consumer Commission (ACCC), Gas Market Reform Group (GMRG) and Australian Energy Market Commission (AEMC) prior to the passing of the legislative and regulatory reform package identified a range of information gaps and asymmetries across the eastern and northern Australian gas markets that they consider are:

- hindering the ability of the market to respond efficiently to changing market conditions;
- impeding effective competition and the efficient trade of gas and infrastructure services; and
- resulting in inefficient decisions about consumption, production and the use of infrastructure services and longer-term investment decisions.

With regards to the BB, the 2020 GBB Biennial Report found that:

- Users agreed that the increase in the amount of information available (introduced in 2018) on the GBB has been beneficial, but the information can be hard to interpret.
- Many users have their own systems to bring in data and rarely use the GBB website.
- Two user types come to the GBB website
 - Ad hoc – looking for a key piece of information such as LNG maintenance.
 - Analytical – those that are conducting a piece of analysis, e.g., consultants, on-sellers of information.
- The layout of the data portal was considered poor and not user friendly.
- Two key pieces of information are used:
 - Historical gas flow data; and
 - Facility capacity outlook information (including LNG maintenance notices).
- The summary map was ranked highly in terms of features that users most liked; however, interrogation of data from the map was not seen as a high priority.
- Performance issues were slow to be addressed, but has improved.

1.3. Decision

AEMO is updating its Procedures, systems and associated documentation to take into account the National Gas Amendment (Market Transparency) Rule 2022. This is intended to address the following information deficiencies by adding reporting obligations for market participants.

Gas Market Segment	Information Deficiencies
Gas and infrastructure prices	Information on production costs, wholesale and retail gas prices.
Supply and availability of gas	Information on reserves and resources, contracted reserves, drilling activities and LNG imports.
Infrastructure used to supply gas to end-markets	Information on available capacity, infrastructure developments, compression service availability, and in relation LNG import facilities (if import terminals establish).
Demand	Gas use by LNG export facilities and large gas users.

AEMO is to create the GSOO Procedures and amend the BB Procedures.

1.3.1. GSOO

AEMO's information-gathering powers have been strengthened as a result of the legislation.

The Northern Territory (NT) is to be included in the GSOO, except NT facilities that only supply NT LNG trains are exempt.

When the Rule change comes into effect in March 2023, the GSOO survey will be mandatory for GSOO reporting entities. This is reflected in the GSOO Procedures and GSOO survey approach.

The following elements of the GSOO will be affected by the GTM measures:

- Gas production and LNG import forecasts including contracting levels.
- Annual and peak day capacity of (and constraints affecting) gas processing plants or LNG import facilities.
- Production cost estimates.
- LNG exporters to report annual supply-demand balance.
- Information about wells drilled in the last year.
- Factors that may affect volume of gas supplied.

As the GSOO Procedures will only come into effect in March 2023, they will not be able to be used for the 2023 GSOO. AEMO proposes to conduct the first mandatory GSOO survey under these Procedures for the 2024 GSOO. AEMO will still be asking for information on a voluntary basis for the 2023 GSOO and requires additional time to develop the appropriate contacts for participants in the new NT GSOO jurisdiction, as well as forecasts for NT customers, and the relevant infrastructure. AEMO is discussing this with the AER outside of this consultation.

1.3.2. Registration & Reporting Changes

New registration requirements and associated activities are involved in this consultation.

There are new registration categories:

- Large users (distribution and transmission) and their facilities
- Field operators and their fields
- Facility developers and their developments
- LNG facility operators and their facilities (import and export but excludes NT facilities)
- Transaction reporting (LNG shipments, LNG transactions, gas trades, capacity trades)

There are new Rules to allow for a simplified registration process and conditional registration.

All members of a facility operator groups are not required to be registered. The requirement is now on the responsible reporting entity for the group to register and to inform AEMO of who is in the group, under NGR 158 (2).

The Procedures clarify that the registration of a participant is as a BB reporting entity rather than registering a facility (i.e. participants no longer as facility operator, pipeline operator, etc). It is single registration as a BB reporting entity and then participants can register fields, facilities and developments. The BB reporting entity is responsible for providing the information to AEMO in accordance with the Rules and Procedures.

Other registration categories are BB shippers and BB reporting agent.

Registration processes and systems are proposed to be updated to identify reporting entities or other categories (rather than type of facility operator). A BB reporting agent will be able to submit information on behalf of certain entities.

Compression facilities are deemed to be registered, moving from transitional rules to Part 18.

The BB register will capture:

- These changes under NGR 147(1) & (2); and
- Exemption information under NGR 147(1A).

Larger User Facilities

A person with operational control of a large user facility including GPG (nameplate rating >10TJ/day) will need to register and submit daily consumption data. This is estimated to be estimated 27 customer sites and 38 Gas Powered Generators.

As the retail market operator, AEMO is required to report the information for each large customer in the DWGM or STTM (likely to be around 6 large user facilities). Most large user data is already being reported on the GBB, provided by the pipeline operator. AEMO proposes to make the 'Large User Facility' a reportable category.

It is expected that 5 large users will be required to register and provide data themselves.

Reporting entities for large user facilities may apply for an exemption from the requirement to provide daily consumption data where the information is already provided by the pipeline operator, or the large user is the only recipient of gas at the delivery point.

Users that are exempt from providing consumption data must still provide confirmation of nameplate capacity via email to AEMO.

LNG Export Facilities

3 Queensland LNG plants will be required to register and provide daily consumption data and capacity outlooks. There is a new requirement for the 3 Qld LNG plants to provide exported volumes of shipments and for AEMO to publish no later than 20 business days into the following month.

The NGR also impose a requirement to report details of LNG export transactions including FOB price of short-term supply agreements (<1 year) within 1 business day and AEMO to publish this after 20 business days. This information will be anonymised and aggregated.

2 Northern Territory LNG plants; Darwin and Ichthys continue to be exempt. LNG plants will be able to apply for an exemption from providing daily consumption data under NGR 190.

Gas and Capacity Transactions

Gas sellers are to report price and key terms for gas trades & gas swaps under 12 months and over 1TJ within 1 business day. Existing capacity transactions being expanded to storage facilities, to be reported by capacity sellers.

AEMO proposes to update the submission guide to allow csv files to be emailed.

For gas swaps, both parties are counted as a seller and need to report according to NGR 190CB.

Gas Reserves

Gas field owners must report reserves annually. This includes 1P, 2P, 3P, 2C developed and undeveloped reserves.

Each field may have a different annual reporting date under NGR 171 (7).

Information on gas fields must be reported under NGR 171A. Joint venture partners can report jointly if jointly marketing gas.

Fields that exclusively supply exempt NT LNG facilities are exempt.

Facility Developers

Facility developers are required to report details of proposed facility development projects that will have a nameplate rating when commissioned above 10 TJ/day.

1.3.3. BB Changes

There will be up to 20 new submission and report types for the BB made up of around 80 new data points.

There will be new data submissions and reports on the following areas:

- Gas, LNG and Infrastructure prices
Short term gas swaps, Gas supply agreements, LNG export transactions, secondary storage transactions.
- Supply and availability of gas
Producers to report on gas reserve information. LNG import facilities to report on storage and gas supply.
- Demand for gas
Large users and LNG exports to report on daily flow data. This will include AEMO providing data, as the retail market operator, on behalf of Large users.
- Infrastructure
Facility developments to be reported. Extension and introduction of uncontracted capacity outlooks for some facilities. Materiality threshold changed.

AEMO to report GSH capacity and commodity trades on the GBB.

For the specific proposed Procedure changes, please see the Attachments to this NoD.

1.4. Draft IIR

In accordance with the Approved Process under Rule 135EC of the NGR, AEMO circulated a drafted IIR that put forward changes to the Procedures in Attachments B-F to the GWCF on 27 July 2022. Registered participants and interested stakeholders were invited to make submissions which closed on 12 August 2022.

AEMO received 7 submissions, one of which was confidential. The other submissions were from APA, APGA, Arrow Energy, Cooper Energy, Epic Energy and Jemena. None of the submissions objected to the proposal and they each made several additional suggestions for the provision of information to the market. These submissions and AEMO's response to it are summarised in Section 8. See Attachment G for further information on the feedback received and AEMO's response to any specific issues or suggestions that were raised.

Following the closing of submissions in response to the Draft IIR, AEMO published an early version of the IIR on 17 August 2022. However, in order to consider each submission in full, AEMO republished the IIR on 26 August, along with several additional Guides so participants can assess whether the Procedures are fit for purpose. These were the:

- Example GSOO, Victorian Gas Planning Report and Large Industrial Load Questionnaires.
- The BB Data Submission Guide.

1.5. IIR

In accordance with the Approved Process under Rule 135EC of the NGR, AEMO published an IIR that put forward changes to the Procedures on 26 August 2022. Stakeholders were invited to make submissions which closed on 26 September 2022.

AEMO held a number of meetings with stakeholders on an individual basis about the proposed changes, as well as an industry-wide workshop on 14 September 2022. The results of this workshop, including the questions received and AEMO's responses and clarifications, were circulated on 21 September 2022 and are available on the consultation page [here](#).

Several factors delayed the submission closure date and had knock-on effects that delayed the publication of this NoD as well as the effective dates of this consultation. These included the need to republish the IIR as detailed above, the National Day of Mourning on 22 September 2022 and difficulties in progressing the IT market trial for the proposed changes. AEMO is discussing the delayed implementation of the Gas Transparency Measures with the AER. The timeline for implementation is summarised in Section 10 and AEMO will provide further guidance on Market Trial as further information emerges on this matter.

AEMO received 7 submissions in response to the IIR, from:

- APA
- APGA
- APLNG
- Jemena
- Origin Energy
- SEA Gas
- Shell

None of the submissions objected to the proposal and they each made several additional suggestions for the provision of information to the market. These submissions and AEMO's response to it are summarised in Section 8. See Attachment A for further information on the feedback received and AEMO's response to any specific issues or suggestions that were raised.

Attachment A of this Notice sets out the consolidated feedback relating to the proposed amendments that AEMO received during this consultation phase. This attachment includes stakeholder comments, AEMO responses and, based on those responses, an indication where respondent feedback resulted in further amendments to the documents mentioned above.

Having considered the feedback provided by each respondent, AEMO has approved the proposed amendments of this Notice and has set the effective date for the changes as outlined in Section 10.

2. REFERENCE DOCUMENTATION

- GSOO Procedures.
- BB Procedures.
- Guide to Capacity Transfer and Day-ahead Auction Reports.
- Guide to Capacity Transfer and Day-ahead Auction Transactions.
- BB Aggregation Methodology.
- BB Submission Guide (formerly a Procedure).
- GSOO & Victorian Gas Planning Report Survey.
- Large Industrial Load Questionnaire.
- Application for Registration - Gas - GBB and Part 24.

3. OVERVIEW OF CHANGES

The changes are to:

- Create the GSOO Procedures.
- Amend the BB Procedures.
- Amend the content of the BB Data Submission Procedure and rename it the BB Data Submission Guide. All procedural elements of the BB Submission guide have been incorporated into the BB procedures.
- Amend other associated documentation listed in Section 2 and on the consultation page [here](#).

3.1. GSOO Obligations for participants

The Gas Transparency Measures impose a range of obligations upon participants relating to the GSOO, including the obligation to participate in a GSOO survey if AEMO identifies a participant as a GSOO reporting entity.

A GSOO reporting entity is required to participate in a GSOO survey and provide information related to the natural gas industry that AEMO considers is reasonably necessary for the preparation, review, revision or publication of the GSOO.

The Gas Transparency Measures increase the content required to be published in the GSOO (see Section 1.3.1). Where relevant, AEMO will ask GSOO reporting entities to provide data and information relevant to this new content, via the GSOO survey.

The GSOO Procedures specify the requirements of the process for a GSOO survey.

3.2. BB Obligations for participants

The Gas Transparency Measures impose a range of obligations upon participants. The new obligations that participants must comply with under the amended BB Procedures are summarised below:

Pipeline Facilities:

- Must increase Uncontracted Capacity Outlook submissions to 36 months
- Changes to submitting N/A against zero flows (must be receipt or delivery)
- Capacity descriptions enforced as mandatory or not
- Nameplate capacities can now be deactivated
- Shipper lists can be automatically uploaded
- Gate station submission no longer available (connection point submission)

Storage Facilities:

- Must provide Shipper Lists (List of BB shippers with primary firm capacity), automated
- Must increase Uncontracted Capacity Outlook submissions to 36 months
- When providing the quantity of natural gas held in a BB storage facility, how much is storage cushion gas must also be provided. For LNG tanks this will be the heel gas

Compression Facilities:

- Must provide Shipper Lists (List of BB shippers with primary firm capacity)
- Must provide Medium Term Capacity Outlook
- Must increase Uncontracted Capacity Outlook submissions to 36 months

Production Facilities:

- Must provide 36-month Uncontracted Capacity Outlook

LNG Export Facilities:

- Must provide Nameplate rating:
 1. The maximum quantity of gas that the facility can receive from a pipeline on a gas day; and
 2. The maximum quantity of gas that the facility can process to a liquefied state on a gas day.
- Must provide Short Term Capacity Outlook:
 1. The quantity of gas that the facility can receive from a pipeline on a gas day; and
 2. The quantity of gas that the facility can process to a liquefied state on a gas day
- Must provide Medium Term Capacity Outlook
 1. The quantity of gas that the facility can receive from a pipeline on a gas day; and
 2. The quantity of gas that the facility can process to a liquefied state on a gas day
- Must provide LNG shipment data (the LNG export facility, the shipment departure date and the total shipment volume)
- Must provide Actual Flow (daily consumption data):
- The quantity of gas delivered to the LNG export facility on a day (unless an exemption exists)

- Must provide details of any Short-Term LNG Export Transactions Large User Facilities:
- Must provide Nameplate rating
- The maximum quantity of gas delivered to the facility on a gas day
- Must provide Actual Flow (daily consumption data):
 - The quantity of gas delivered to the facility on a day (unless an exemption exists, or
 - data is being provided by the retail market operator)

LNG Import Facilities:

- Must provide Nameplate ratings:
 1. The maximum quantity of LNG that can be received and processed into storage on a gas day; and
 2. The maximum quantity of LNG that can be held in storage on a gas day; and
 3. The maximum quantity of LNG that can be withdrawn from storage for processing to a gaseous state on a gas day; and
 4. The maximum quantity of natural gas that can be injected into one or more pipelines on a gas day.
- Must provide 36-month Uncontracted Capacity Outlooks:
 1. Uncontracted capacity for storage in the LNG import facility; and
 2. Uncontracted capacity for regasification by the LNG import facility
- Must provide Short Term Capacity Outlooks:
 1. The quantity of LNG that can be received and processed into storage on a gas day; and
 2. The quantity of LNG that can be held in storage on a gas day; and The quantity of LNG that can be withdrawn from storage for processing to a gaseous state on a gas day; and
 3. The quantity of natural gas that can be injected into one or more pipelines on a gas day
- Must provide Medium Term Capacity Outlooks:
 1. The quantity of LNG that can be received and processed into storage on a gas day; and
 2. The quantity of LNG that can be held in storage on a gas day; and
 3. The quantity of LNG that can be withdrawn from storage for processing to a gaseous state on a gas day; and
 4. The quantity of natural gas that can be injected into one or more pipelines on a gas day
- Must provide Nomination and Forecast Flow:

- The aggregate quantity to be injected into a BB pipeline/s for the following week
- Must provide Actual Flow and Storage:
 1. The daily production of the LNG import facility; and
 2. The actual quantity of LNG held in storage at each LNG import facility
- Must provide LNG Import shipment data (the LNG import facility, the date unloading commences and the total shipment volume)

Facility Developers

Definition: 'Facility developer means a person who owns, controls or undertakes a facility development project'

Registration: The Facility developer must register. If there is more than one facility developer for a facility development project, then they are taken to be a facility developer group, and one member of the group must register as the BB Reporting Entity for the facility development project.

Data provided to AEMO: The BB reporting entity must provide a range of data to AEMO relating to each of its facility development projects (on registration of the facility development project and annually, by the date specified in the BB Procedures).

Fields Owners:

Definitions:

- 'BB field means a field in respect of which the right to explore for, extract, recover or process petroleum is held under one or more petroleum tenements and that meets the applicable reporting threshold'
Reporting threshold: The field has 1P, 2P or 3P reserves, or 2C resources, of processable gas
- 'BB field interest means a net revenue interest in a BB field'
- 'Field owner means a person with a BB field interest'

Exemptions may be applied to BB fields located in the offshore area of the Northern Territory.

Registration:

A field owner must register as the BB reporting entity for each BB field interest for which it is a field owner. If there is more than one field owner for a BB field, then they may form a field owner group (the group of BB field interests) for the purposes of reporting as long as:

- a) they are closely related entities and one or more of them has a net revenue interest in the BB field; or
- b) each of them holds a net revenue interest in the BB field and they are engaged in joint marketing of natural gas produced from the BB field

The members of a field owner group may appoint one of the members in writing to be the responsible field owner and to register as the BB reporting entity for the group of BB field interests.

Data provided to AEMO:

The BB reporting entity must provide:

1. Standing data to AEMO relating to each of its BB field interests (on registration and annually thereafter, or when the information is no longer accurate); and
2. Details of the reserves and resources of each of its BB field interests for each reporting year

Gas Seller:

- Must provide details of Short-Term Gas Supply or Swap Transactions

Gas Storage Capacity Seller:

- Must provide details of Short-Term Gas Storage Capacity Transactions

Note also:

- FTP submissions will no longer be available
- Exemptions have been clarified that the data must be able to be mapped in AEMO's systems

4. LIKELY IMPLEMENTATION EFFECTS AND REQUIREMENTS

Changes are required to meet the above requirements, as outlined in the Procedures attached to this NoD.

Outside of the scope of this consultation and to complement these Procedure changes, AEMO is also updating documentation including:

- Registration forms, including the Application for Registration form, BB facility registration form, BB data exemption form, BB Change of Facility Operator Form and the GBB Application for Revocation of Facility Registration Form.
- The Registration Application Guide.
- Guide to GBB Reports.
- BB Aggregation Methodology.

In order to aid participants' understanding of the new GSOO Procedures, examples of the GSOO Survey and Large Industrial Load Questionnaire are included in this consultation.

With regards to the IT implementation of these changes:

- More information on the BB data model changes was released over August and September 2022.
- The Gas Data Model v2.2 Draft Technical Specification was circulated on 22 August.
- Market trial is expected to commence in November-December.
- Further information on system changes will follow the publication of this NoD.

5. OVERALL COST AND BENEFITS

The changes to the BB and registration will mean that several categories of market participant will be required to register, and reporting obligations will change.

The changes to the GS00 are minimal, as stakeholders are already providing the majority of the information that is required as part of this change. Increased costs to stakeholders to provide this information will be negligible in magnitude.

In relation to benefits and as outlined by the Department of Climate Change, Energy, the Environment and Water, these measures will:

- Provide greater transparency of information that will provide more accurate signals about how well the market is functioning and allow market participants to more efficiently respond to changing market conditions.
- Promote competition by reducing search and transaction costs that gas users face during the price discovery process and by reducing the imbalance of bargaining power that users can face in each stage of the supply chain.

Noting the above, AEMO's view is that the benefits associated with this change would outweigh the costs. AEMO's total implementation costs, including implementation should be approximately \$1,800,000.00.

6. MAGNITUDE OF THE CHANGES

AEMO considers the order of magnitude of this change is material due to its cost and impact on AEMO's Procedures and documentation, and IT systems. AEMO's total implementation costs, including implementation, are estimated to be \$1,800,000.00.

7. AEMO'S ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH SECTION 135EB:

AEMO puts forward the following assessment regarding compliance with section 135EB of the National Gas Rules:

Consistency with National Gas Law (NGL) and NGR	AEMO's view is that the proposed changes are consistent with the NGL and NGR. Participants will be given an opportunity during this consultation to inform AEMO if they believe there is such an inconsistency.
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National Gas Objective	<p>AEMO’s view is that the proposed change will help achieve the National Gas Objective through two mechanisms:</p> <ol style="list-style-type: none"> 1. Transparency reforms that will facilitate more efficient planning and investment in the domestic gas markets, provide more accurate signals about how well the market is functioning and enable market participants to more efficiently respond to changing market conditions. 2. Measures that will also promote competition by reducing search and transaction costs that gas users face during the price discovery process and by reducing the imbalance of bargaining power that users can face in each stage of the supply chain.
Any applicable access arrangements	<p>AEMO’s view is that the proposed change is not in conflict with existing Access Arrangements. Participants were given an opportunity during this consultation to inform AEMO if they believe the proposed change is in conflict with existing Access Arrangements.</p>

8. CONSULTATION OUTCOMES

8.1. Draft IIR

In accordance with the Approved Process Under Rule 135EC of the NGR, AEMO circulated a drafted IIR that put forward changes to the Procedures in Attachments B-F to the GWCF on 27 July 2022. Registered participants and interested stakeholders were invited to make submissions which closed on 12 August 2022.

AEMO received 7 submissions, one of which was confidential. The other submissions were from APA, APGA, Arrow Energy, Cooper Energy, Epic Energy and Jemena. None of the submissions objected to the proposal and they each made several additional suggestions for the provision of information to the market. These submissions and AEMO’s response to it are summarised in this section. See Attachment G for further information on the feedback received and AEMOs response to any specific issues or suggestions that were raised.

AEMO determined on the basis of these submissions that the proposed change meets the National Gas Objective, with some further amendments proposed and detailed below.

8.1.1. GSOO Procedures Changes between the Draft IIR and the IIR

Several additional changes have been made to the GSOO Procedures, which are track-changed and attached to this consultation. These include:

- Greater flexibility in GSOO Survey responses, specifying that all information in a GSOO survey response must be accurate as at the date the GSOO survey was issued or if practical at the time the information is provided to AEMO should changes happen within the response period, rather than at the time of provision to AEMO.
- An additional clause specifying that if AEMO does not accept a request to treat specific information in a GSOO survey response as confidential, AEMO will endeavour to contact and inform the GSOO reporting entity prior to the release of the information.

- The operator for a joint venture (JV) will be the party to fill in the GSOO survey on behalf of their other JV parties. In some specific cases it may be of value to seek out individual JV's perspective, but this will not be the majority of cases.

8.1.2. BB Procedures Changes between the Draft IIR and the IIR

Several additional changes have been made to the BB Procedures, which are track-changed and attached to this consultation. These include:

- In addition to daily production data, storage information should also be provided by 1:00 PM on each gas day (D+1).
- The description of each linepack/capacity adequacy (LCA) flag has been simplified, including the removal of the requirement to notify AEMO when an LCA flag changes to red. This will be given further consideration following the publication of this IIR.
- Amending the wording to make it clear that BB reporting entities do not make the forecasts but provide the forecasts based on information provided to them by BB shippers. In the event where there are no nominations for a facility, the forecast will be the BB reporting entity's reasonable estimate of expected flows on that BB pipeline.
- Changing a 'best estimate' to a 'reasonable estimate' with regards to 7 day forecasts, as well as associated amendments.
- Clarifying the confidentiality of reporting.
- The actual quantity held in storage should exclude any cushion gas, with regards to clause 6.5.2.

8.2. IIR

AEMO published an IIR that put forward changes to the Procedures on 26 August 2022. Stakeholders were invited to make submissions which closed on 26 September 2022.

AEMO held a number of meetings with stakeholders on an individual basis about the proposed changes, as well as an industry-wide workshop on 14 September 2022. The results of this workshop, including the questions received and AEMO's responses and clarifications, were circulated on 21 September 2022 and are available on the consultation page [here](#).

Several factors delayed the submission closure date and had knock-on effects that delayed the publication of this NoD as well as the effective dates of this consultation. These included the need to republish the IIR as detailed above, the National Day of Mourning on 22 September 2022 and difficulties in progressing the IT market trial for the proposed changes. AEMO is discussing the delayed implementation of the Gas Transparency Measures with the AER. The timeline for implementation is summarised in Section 10 and AEMO will provide further guidance on Market Trial as further information emerges on this matter.

AEMO received 7 submissions, none of which objected to the changes proposed in the IIR. These were received from:

- APA
- APGA
- APLNG

- Jemena
- Origin Energy
- SEA Gas
- Shell

None of the submissions objected to the proposal and they each made several additional suggestions for the provision of information to the market. See Attachment A for further information on the feedback received and AEMO's response to any specific issues or suggestions that were raised. This attachment includes stakeholder comments, AEMO responses and, based on those responses, an indication where respondent feedback resulted in further amendments to the documents mentioned above.

Having considered the feedback provided by each respondent, AEMO has approved the proposed amendments of this Notice and has set the effective date for the changes as outlined in Section 10.

8.2.1. GSOO Procedures Changes between the IIR and the NoD

No further changes have been made to the GSOO Procedures between the publication of the IIR and this NoD. However, in response to the feedback received from participants, several elements of the surveys have been clarified with regards to AEMO's expectations.

8.2.2. BB Procedures Changes between the IIR and the NoD

Several additional changes have been made to the BB Procedures, which are track-changed and attached to this consultation. These include:

- The criteria for classification (Clause 3.7.1) have been amended to address the concerns flagged by APA, APGA and Jemena. AEMO notes that no individual respondent stated their support for the clause as previously drafted.
- The definitions of the Linepack/Capacity Adequacy Flags (Clause 6.3.2) have been amended to reflect the concerns raised by APA, APGA, SEA Gas and Jemena.
- Regarding forecast delivery information (Clause 6.4.2 (d)), BB reporting entities are allowed to submit either a zero nomination if a BB Facility Operator has an agreement with a BB Shipper to treat no provided nominations as a zero or the last known forecast provided by the shipper where the BB shipper has not provided forecast nominations.

IMPACT & IMPLEMENTATION REPORT – RECOMMENDATION(S)

9. SHOULD THE PROPOSED PROCEDURES BE MADE?

AEMO's decision is to make the changes proposed in Attachments B-C as well as other documents attached to the NoD.

10. TIMELINES

Submissions on the IIR closed on 26 September 2022. Subject to all necessary approvals, AEMO will implement this change on a staggered basis, beginning in October 2022 with the publication of this NoD. To achieve this timeline, AEMO has decided on the following key milestones:

- NoD issued on 5 October 2022.

- BB Procedures for the purpose of the new registration rules will go live on 3 November 2022.
- Market trial for the IT changes is expected to occur in November-December 2022.
- The deadline for participants to apply for registrations will be 1 December 2022.
- New GSOO procedures will go live on 15 February 2023.
- New BB reporting obligations will begin on 15 March 2023.

Please note that the effective dates as described in the Rules are earlier than above, but AEMO has delayed their implementation in order to complete a more thorough consultation in accordance with the Rules. AEMO has discussed the delayed implementation of some Gas Transparency Measures obligations with the AER, which is reflected in their Compliance Bulletins. These are outlined below:

- BB Procedures for the purpose of the new registration rules were to go live on 22 September 2022.
- Application for registrations deadline was to be 20 October 2022.
- New BB reporting obligations were to begin on the 15 December 2022.

ATTACHMENT A – FEEDBACK GIVEN TO IIR

Submissions in response to the IIR closed on 26 September 2022. Please note that the submissions received from APGA and Origin were received in the form of letters rather than using the Response Template, and as such have been incorporated into the tables below.

Section 1 - General Comments on the Proposed Procedure Change

Topic	Respondent	Participant response	AEMO response
<p>Sections 1 to 9 of the IIR sets out details of the proposal.</p> <p>Does your organisation support AEMO's assessment of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO's assessment (include Draft IIR section reference number) of the proposal and include information that supports your organisation's rationale why you do not support AEMO's assessment.</p>	Jemena	<p>Jemena broadly supports AEMO's assessment, noting that the proposed changes are consistent with recent changes to the NGR.</p> <p>We encourage AEMO to provide information as early as possible to market participants about the contents of the final BB procedures with respect to the obligations commencing on 15 December, to ensure participants have sufficient time to make the necessary IT system changes to comply with these new obligations.</p> <p>Furthermore, if there is to be a delay to the 15 December commencement of these obligations (as suggested by the AER on 21 September), we request that AEMO be cognisant of potential staff, vendor and IT support availability constraints faced by market participants over the summer holiday period, in addition to the heightened workloads in early January facing market participants which operate on a 31 December financial year-end. We therefore suggest that any delayed commencement date not occur before late January 2023.</p>	<p>AEMO notes Jemena's support for the proposal.</p> <p>AEMO will inform participants of any further changes to the proposed timelines as they are confirmed.</p>
	SEA Gas	<p>In relation to the changes to LCA reporting and Forecast nomination reporting, the IIR summary in 3.2 is silent on these matters, yet the changes are quite significant. For the other items listed as they relate to Pipeline Facilities, SEA Gas is comfortable with the changes proposed.</p>	<p>AEMO notes the respondent's comment and has responded to the other comments below.</p>
	Shell	<p>See specific feedback given. Shell supports thorough consultation on all BB procedures and appreciates the amount of work AEMO has put into it thus far.</p>	<p>AEMO notes Shell's support for the proposal.</p>

Section 2 - Feedback on the documentation changes in the Attachments of the IIR.

Gas Statement of Opportunities (GSOO) Procedures				
Procedure Clause #	Respondent	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response
3.3	APA	<p>Form of GSOO surveys and responses</p> <p>If AEMO requires GSOO reporting entities to respond to the survey within 20 business days, this is on the basis that they GSOO survey template hasn't changed. If it has changed, AEMO needs to provide the GSOO Reporting Entity with the proposed template at the time of the determining and maintaining contact details as per 3.1 of the GSOO procedures to give it time to consider the data and format of provision. This is because this takes time for an entity to understand what information is being sought, and whether it is a reasonable format and way to provide it. Doing this within the 20 business day timeframe is unreasonable.</p>		<p>AEMO notes the respondent's comment.</p> <p>The suggestion that any change to the surveys may lead to an unreasonable burden is understood.</p> <p>As mentioned in the GSOO procedure, up to date survey templates will be available on AEMO's website.</p> <p>GSOO reporting entities will be notified of the survey location on AEMO's website at the time of determining and maintaining contact details.</p> <p>Any changes to GSOO survey templates will be communicated with participants at relevant industry forum(s) in a timely manner to ensure engagement with reporting entities ahead of the survey deployment, consistent with feedback received.</p> <p>No change to the GSOO procedures is required.</p>
5	APA	<p>Forecast Horizon for GSOO Survey</p> <p>For the forecast horizon of 10 years as specified in the National Gas Rules 135KE(5) and 135KB(1), it is critical to note that this is provided by GSOO reporting entities based</p>		<p>AEMO notes the respondent's comment.</p> <p>AEMO will ensure that all future GSOO surveys include clarification around the level</p>

		<p>on a reasonable estimate. For instance, data provided on planned maintenance and outages is usually only planned on a 2-5 year horizon and is subject to change regularly. It is not reasonable to expect a high level of accuracy for data on a 10 year horizon. Whilst an estimation of this could be provided it's important to note that this is provided on a reasonable basis and is subject to change.</p> <p>APA requests that AEMO reflects this somewhere within the GSOO procedures.</p>		<p>of accuracy expected for requested reporting horizons.</p> <p>No change to the GSOO procedures is required.</p>
6	APA	<p>Confidentiality</p> <p>It is critical that if a GSOO reporting entity has declared information is confidential that this is upheld by AEMO if:</p> <p>(a) The information is not in the public domain</p> <p>(b) a confidentiality agreement in place with a counterparty.</p> <p>As per the current NGL and GSOO process, it is reasonable that AEMO will utilize this information for analysis and assessment to reach conclusions for the gas statement of opportunities.</p>		<p>AEMO notes and agrees with the respondent's comment.</p> <p>AEMO believes that the existing Confidentiality section in the GSOO Procedure is consistent with APA's comment, so no change is required for the GSOO Procedures.</p>
Gas Bulletin Board (GBB) Procedures				
Procedure Clause #	Respondent	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response
3.4	Origin	Responsible party for reporting pipeline information		<p>AEMO notes the respondent's comment.</p> <p>From Section 3.2 of the procedures:</p>

		<p>Lastly, for GTM reporting obligations that relate to pipelines, Origin asks AEMO to clarify in its procedures whether the pipeline owner or pipeline operator is the responsible reporting entity. We consider ongoing reporting obligations best sit with the pipeline operator, given its role in the day-to-day management of the pipeline.</p>		<p><i>Under Part 18, each of the following persons must apply to AEMO to register as a BB reporting entity:</i></p> <ul style="list-style-type: none"> <i>facility operators for each BB facility for which it is a facility operator;</i> <p>The definition of a BB facility is inclusive of a BB pipeline.</p>
<p>3.7.1</p>	<p>APA</p>	<p>Extension & Expansion Projects</p> <p>As per APA’s comments raised in the <i>Draft IIR response template for Gas Transparency Measures Consultation</i> of 12 August 2022, APA maintains that the current proposed wording raises significant concerns. As such, APGA proposed alternate wording outlined in blue in the Proposed Text column, which APA supports.</p> <p>APA is appreciative of AEMO considering the APGA alternative wording and proposing this to a GWCF workshop on 14 September 2022.</p> <p>In developing this alternative wording as an industry, we tried to seek a balance of reporting projects</p> <p>whether or not publicly announced, but that are sufficiently progressed in their assessment and maturity that their announcement will not unnecessarily mislead the market by having critical conditional elements outstanding. This includes a reasonable forecast of commercial conditions, key environmental and regulatory</p>	<p><u>a) A project is a proposed project if the participant: (i) anticipates that the project will proceed, including, but not limited to, on the basis of a reasonable forecast of commercial conditions at the time of reporting;</u></p> <p><u>(ii) has reasonable expectations that all necessary approvals (for example planning permits, environmental permits, native title and cultural heritage) will be obtained on terms and conditions acceptable to the participant; and</u></p> <p><u>(iii) if new or different land tenure is required, the participant has entered into binding arrangements in relation to the relevant land.</u></p> <p><u>(b) A project is a committed project if the project has successfully reached a final investment decision (FID) and is progressing through the engineering, procurement and construction phase (EPC), but is not currently operational.</u></p> <p>A project can be a facility development project whether or not it has been publicly announced. For the purposes of Rules 152(6), such a project will be a</p>	<p>AEMO notes the respondent’s comment.</p> <p>See AEMO’s response to APGA’s comment below for context around the final decision.</p>

	<p>approvals and land tenure. To give some perspective it is considered that projects that meet these criteria and therefore the reporting entity is obliged to report under 3.7.1 are likely to be at a phase on the project development continuum where capital is about to be committed and front end engineering and design is likely to commence. Consequently, there is a large likelihood that this project is going ahead; however, some elements may still need to be closed, concluded or obtained before FID is considered or achieved.</p> <p>In contrast, the current broad scope of the criteria in section 3.7.1 of the draft procedures would capture projects only in their infancy that may never eventuate. This could easily mislead the market and detract from the object of the gas bulletin board (s 145 NGR) from providing information to enable "informed and efficient decisions in relation to the provision and use of natural gas and natural gas services".</p> <p>Further, as per ASX Listing Rule 3.1 and section 674 of the Corporations Act 2001, a publicly listed company is required to immediately notify the market via an announcement to ASX of any information concerning the entity, that a reasonable person would expect to have a material effect on the price or value of APA securities. That is, information that would, or would be likely to, influence persons who commonly invest in securities in deciding whether to acquire or dispose of APA securities. Such information is referred to as price sensitive information.</p>	<p>proposed project and a committed project if any of the following criteria are met:</p> <p>(a) A project is a proposed project if:</p> <p>(i) the participant considers the project to be justified on the basis of a reasonable forecast of commercial conditions at the time of reporting, and there are reasonable expectations that all necessary approvals (such as regulatory approvals) will be obtained; or</p> <p>(ii) the project requires new infrastructure that currently does not have approved planning permits or environmental approvals; or</p> <p>(iii) the project has not reached financial investment decision (FID) but is anticipated to proceed (using existing infrastructure).</p> <p>(b) A project is a committed project if:</p> <p>(i) the project has successfully passed a financial investment decision (FID), and is progressing through the engineering, procurement, and construction (EPC) phase, but is not currently operational.</p>	
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<p>3.7.1</p>	<p>APGA</p>	<p>Low bar of commercial justification</p> <p>One way in which Part (a) risks overreporting of low probability projects is by only requiring justification, rather than an intention to proceed. BB Participants are comprised predominantly of private enterprise with no obligation to proceed with any project, even if commercially justified. Further, commercial justification could be interpreted by some market participants to represent a relatively low bar for reporting, risking large numbers of early concepts for projects to be captured under Part (a). Reporting of every thought bubble project that may be commercially justifiable, without intent to act upon the project, would mislead other market participants.</p> <p>Unintended consequence of 'or' combinations of criteria</p> <p>A further way in which Part (a) risks overreporting of low probability projects is in its need to only satisfy one of the identified conditions. In particular, the proposed drafting could require BB Participants to report a project that requires new infrastructure that currently does not have approved planning permits or environmental approvals—even if that project is not considered to be commercially justified on the basis of a reasonable forecast of commercial conditions at the time of reporting. This is clearly an undesirable situation which risks misleading BB Participants.</p> <p>Interaction with ASX reporting requirements</p>	<p>(a) A project is a proposed project if the participant:</p> <p>(i) anticipates that the project will proceed, including, but not limited to, on the basis of a reasonable forecast of commercial conditions at the time of reporting;</p> <p>(ii) has reasonable expectations that all necessary approvals (for example planning permits, environmental permits, native title and cultural heritage) will be obtained on terms and conditions acceptable to the participant; and</p> <p>(iii) if new or different land tenure is required, the participant has entered into binding arrangements in relation to the relevant land.</p> <p>(b) A project is a committed project if the project has successfully reached a final investment decision (FID) and is progressing through the engineering, procurement and construction phase (EPC), but is not currently operational.</p>	<p>AEMO notes the respondent's comment. Given this feedback received, AEMO has revised the final wording.</p> <p>With regards to the specific concerns raised about the previous drafting:</p> <ol style="list-style-type: none"> a. Low bar of commercial justification AEMO has revised the criteria to provide more specific guidance around the definition of a proposed project. These criteria are reflective of a proponent's commitment to invest in the initial development of a project, as per rule 152(7). b. Unintended consequence of 'or' combinations of criteria AEMO's acknowledges the respondent's concern around the use of 'or' statements, however we deem it appropriate to include some optionality to take into account the varying types of projects and the differing approaches that can be taken by proponents in developing projects. c. Interaction with ASX reporting requirements AEMO is of the view that BB reporting entities are able to manage their reporting obligations for both the GBB and the ASX, and that the obligations outlined in the BB Procedures do not induce a conflict between obligations.
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3.7.1	Jemena	<p>Jemena provided early comments on the criteria for classification set out in clause 3.7.1 to AEMO on 12 August 2022. Jemena appreciates the direct engagement AEMO has undertaken with the Australian Pipelines and Gas Association (APGA) and other stakeholders on this matter following the previous round of submissions.</p> <p>Consistent with the issues noted by AEMO during its stakeholder workshop on 14 September, we remain concerned that the proposed drafting in relation to ‘proposed projects’ would likely capture a much larger number of potential concepts than would be appropriate and useful to publicly report—including due to the use of ‘or’ between the sub-clauses of 3.7.1(a).</p> <p>To address these concerns, and following this further engagement with APGA and AEMO, Jemena supports the alternative drafting proposed by APGA for clause 3.7.1(a).</p>	<p>(a) A project is a proposed project if:</p> <p>(i) the participant considers the project to be justified on the basis of a reasonable forecast of commercial conditions at the time of reporting, and there are reasonable expectations that all necessary approvals (such as regulatory approvals) will be obtained; or</p> <p>(ii) the project requires new infrastructure that currently does not have approved planning permits or environmental approvals; or</p> <p>(iii) the project has not reached financial investment decision (FID) but is anticipated to proceed (using existing infrastructure).</p> <p><u>(i) the participant anticipates that the project will proceed, including, but not limited to, on the basis of a reasonable forecast of commercial conditions at the time of reporting;</u></p> <p><u>(ii) the participant has reasonable expectations that all necessary approvals (for example planning permits, environmental permits, native title and cultural heritage) will be obtained on terms and conditions acceptable to the participant; and</u></p> <p><u>(iii) if new or different land tenure is required, the participant has entered into binding arrangements in relation to the relevant land.</u></p>	<p>AEMO notes the respondent’s comment.</p> <p>See AEMO’s response to APGA’s comment above for context around the final decision.</p>
3.10	Origin	<p>Exemption framework</p> <p>Under the GTM, large user facilities (including gas powered generators) are required to provide daily consumption data, unless they are granted an exemption by AEMO. Origin encourages AEMO to provide greater clarity on the exemption framework, including the process, timing and eligibility for exemptions.</p>		<p>AEMO notes the respondent’s comment.</p> <p>As per section 3.10 (g) and (h) and section 6.5.3 (b) of the BB Procedures, a BB reporting entity that is responsible for reporting for a BB large user facility is eligible for an exemption if the data is provided by another avenue as outlined in the procedure and rules.</p>

		<p>The GTM Decision Regulation Impact Statement¹ supported reducing the reporting burden for large users by “requiring the pipeline operator to report the information [daily gas consumption data] for those large users that are the only ones being supplied at a delivery point on a transmission pipeline”. Granting exemptions to large users in such cases will reduce duplication.</p> <p>Origin understands pipeline operators already report on actual flow data in daily allocation reports to counterparties and so are well placed to provide daily consumption information for those large users that are the only parties supplied at a delivery point. A clear exemption process would assist participants in managing/determining their obligations and so improve the implementation of the GTM.</p>		<p>Additional information on the timelines and the exemption forms will be provided prior to the BB procedure effective date.</p>
6.1	Origin	<p>Interpretation of nameplate capacity</p> <p>The GTM also require large user facilities to provide the nameplate capacity of their connection points. Origin would appreciate if AEMO could clarify whether this capacity figure should be based on the maximum physical transfer possible at the delivery point or instead informed by the maximum daily quantity (MDQ) set out in contractual transportation arrangements. In our view, basing the capacity figure on contractual MDQ better reflects the actual maximum usage of large user facilities.</p>		<p>AEMO notes the respondent’s comment.</p> <p>The definition for nameplate rating for a user facility is outlined in NGR 141(2). AEMO’s view is that this relates to the maximum physical transfer possible and that this is consistent with how pipeline operators report connection point nameplate capacities currently.</p>

¹ COAG Energy Council, *Measures to Improve Transparency in the Gas Market, Regulation Impact Statement for Decision*, March 2020, p. 130

6.3.1	Jemena	<p>As set out in Jemena’s submission on 12 August 2022, we consider that clause 6.3.1(f) should be amended to only require a production facility operator to take account of short term trends in gas field performance where it is aware of such information, given that the operator of an open access gas processing facility may not be the owner or operator of the gas fields supplying that facility, and therefore may have no knowledge of the day-to-day operations of those fields.</p> <p>We note AEMO’s response to our earlier submission that this clause is proposed not to be amended as a result of the Gas Transparency Measures consultation and that there is no majority opinion from participants regarding this issue.</p> <p>We note that this is not an issue which impacts a large number of processing facility operators—Energy Ministers recently noted that only a relatively small number of facilities offer third-party access.² However, in the context of the broader reform objective of improving the quality and reliability of information available on the BB, we do not consider that it is reasonable to require any market participants to take account of information they do not have access to when preparing data for the BB.</p> <p>We also note that our proposed drafting amendment to clause 6.3.1(f) would not prevent a production facility operator from</p>	<p>(f) If a production facility operator is aware of such information, <i>Production facility operators</i> must also take account of any short term trends in gas field performance if that is constraining or will constrain overall <i>daily capacity</i> within the relevant period.</p>	AEMO notes the respondent’s comment.
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² Energy Ministers, Options to advance the east coast gas market, November 2021, p. 58.

		<p>taking account of this information in the event that it did have access.</p> <p>We would welcome the opportunity to discuss this matter directly with AEMO, including whether any alternative drafting may be more suitable.</p>		
6.3.2	APA	<p>Linepack/ Capacity Adequacy Flags</p> <p>APA reiterates its concerns regarding the proposed changes for the Linepack/Capacity Adequacy Flags as raised in the Draft IIR response template for Gas Transparency Measures Consultation of 12 August 2022.</p> <p>If AEMO's core concern is having clarity around Day Ahead Auction being interrupted or curtailed, this can be done in terms of a definition of Firm capacity in the definitions of the BB Procedures that Day Ahead Auction quantities are considered non-firm. This is how APA currently interprets and applies the LCA flag, and therefore no further clarification in the criteria of 6.3.2 is required.</p> <p>Similarly, APA reiterates that the Short Term Capacity Outlook (STCO) for a pipeline shouldn't be replicated in the LCA flag. This was also reiterated in the GWCF Workshop on 14 September by industry that noted a pipeline could have a 20% reduction in capacity thought not curtail load depending on its contractual and service usage.</p> <p>If AEMO wishes to increase transparency on capacity outlooks for facilities, it could invest in a graphic on its GBB of these numbers that are currently outlined in excel spreadsheets and hard to readily access.</p>	<p>Amber Flag BB Pipelines:</p> <ul style="list-style-type: none"> It is unlikely that involuntary curtailment of 'firm' capacity is required, but at least one of the following conditions is met: Non-firm nominations, including nominations made for capacity won in the Day Ahead Auction, have been interrupted or curtailed, including any curtailment that a BB reporting entity becomes aware of that is downstream of the connection point; or The short term capacity outlook for a segment of a pipeline is reduced by [20]% when measured against the nameplate Capacity For a BB pipeline that is also a Part 20 STTM facility, where the ex_ante_capacity_price is not zero. <p><u>Pipeline is flowing at full capacity, but no involuntary curtailment of 'firm' load is likely or happening.</u></p> <p>Red Flag BB Pipelines:</p> <p>One of the following conditions is met:</p> <ul style="list-style-type: none"> Involuntary curtailment of 'firm' capacity is likely or happening, including the inability to deliver to a receipt or delivery point due to curtailment that is occurring downstream of that point. 	<p>AEMO notes the respondent's comment.</p> <p>The following amendments will be made to the criteria:</p> <p><u>Amber Flag BB Pipelines</u></p> <p>Pipeline is flowing at full capacity, but no involuntary curtailment of 'firm' load is likely or happening.</p> <p><u>Red Flag BB Pipelines</u></p> <p>One of the following conditions is met:</p> <ul style="list-style-type: none"> • Involuntary curtailment of 'firm' load is likely or happening; or, • Linepack has, or is forecast to, drop below minimum operating levels.

		The reference to a Part 20 STTM facility ex-ante price must be removed as this is not something facility operators generate or in control of. In addition if the MSP pipeline is taken as an example, the MSP at Wilton is a pressure controlled value, so if there is a constraint at the Wilton STTM this could be reflected the next day on the MSP actual deliveries despite APA making this gas available as per shipper nominations. This is not something APA is in control of and shouldn't be obligated to anticipate 3 days out from gas day.	<p>Line pack has, or is forecast to, drop below minimum operating levels</p> <p>Involuntary curtailment of 'firm' load is likely or happening.</p>	
6.3.2	APGA	Concerns do remain around changes proposed to the 'amber' flag. Moving to an incomplete set over specific circumstances risks misleading market participants. APGA proposes that the current wording remain		AEMO notes the respondent's comment. See the response to APA's comment.
6.3.2 Linepack Capacity Adequacy	SEA Gas	Where a pipeline is not fully contracted, there can be a large disconnect between interruption to nominations for capacity won in the Day Ahead Auction and the ability to flow firm nominations, or indeed flow additional gas through other services.	Remove. It is unclear what the aim of this clause is.	AEMO notes the respondent's comment. See the response to APA's comment.
6.3.2 Linepack Capacity Adequacy	SEA Gas	Where a pipeline has nominations achievable through use of free flow or less than all compressors, reduction in capacity due to compressor outages has no impact on the ability to provide a service.	The short term capacity outlook for a segment of a pipeline capacity is reduced by 20% when measured against the nameplate capacity and there is likely to be reduced ability to service all nominations.	AEMO notes the respondent's comment. See the response to APA's comment.
6.3.2 Linepack Capacity Adequacy	SEA Gas	Pipeline facilities are not dependent on pricing in the STTM market, and as such do not monitor pricing	Remove requirements to change based on ex_ante_capacity_price. This should be managed by AEMO.	AEMO notes the respondent's comment. See the response to APA's comment.

6.3.2	Jemena	<p>Jemena has contributed to and supports the position put forward by APGA in relation to changes to the linepack capacity adequacy flag definitions. In particular, the inclusion of a criteria in the amber flag definition relating to a percentage reduction in the short term capacity outlook of a pipeline segment represents an unnecessary duplication of BB information, and may potentially be a misleading indicator to market participants in circumstances where pipeline flows are within the (reduced) capacity available.</p>	<p><i>LCA Flag for BB pipelines (other than those within the declared transmission system) – Amber:</i></p> <p>It is unlikely that involuntary curtailment of ‘firm’ capacity is required, but at least one of the following conditions is met:</p> <ul style="list-style-type: none"> • Non-firm nominations, including nominations made for capacity won in the Day Ahead Auction, have been interrupted or curtailed, including any curtailment that a <i>BB reporting entity</i> becomes aware of that is downstream of the connection point. or • The short term capacity outlook for a segment of a pipeline is reduced by [20]% when measured against the nameplate capacity <p>For a BB pipeline that is also a Part 20 STTM facility, where the ex_ante_capacity_price is not zero.</p>	<p>AEMO notes the respondent’s comment. See the response to APA’s comment.</p>
6.4.1 6.4.2(d) 6.4.4 6.4.5	APA	<p>Nominated and forecast delivery information for BB pipelines, storage facilities compression and production facilities</p> <p>As per APA’s comments raised in the Draft IIR response template for Gas Transparency Measures Consultation of 12 August 2022, APA maintains that the expectation of a Facility Operator providing forecasts and nominations on behalf of a shipper is unreasonable and not appropriate in a contract carriage market. Shippers are responsible for their forecasts and nominations and where not provided are determined by APA as zero in accordance with the APA Standard Gas Transportation Agreement (GTA) available on APA’s website here. It is not appropriate and will mislead the</p>	<p>6.4.2 (d) The BB reporting entity is required to provide 7 day Forecasts as provided by the BB shipper. Where no nomination has been provided and no agreement is in place between the BB reporting entity and the BB shipper that no nomination equals zero, a BB reporting entity may forecast to a reasonable level as it would do so for its own operating purposes.</p> <p>are no nominations for that facility. A Forecast in this case must be the BB reporting entity’s reasonable estimate of expected flows on that BB pipeline, based on the information provided to them by BB shippers, potentially taking into account factors such as BB</p> <p>(i) Day of the week</p> <p>(ii) Seasonality</p> <p>(iii) Weather forecasts</p>	<p>AEMO notes the respondent’s comment.</p> <p>According to rule 183, a BB reporting entity must provide to AEMO the 7-day forecasts if BB shippers have provided forecast nominations. For the avoidance of doubt this information is to be based only on information provided by BB shippers and does not represent the BB reporting entity’s forecast.</p> <p>AEMO are happy for the BB procedures to align with this rule by allowing BB reporting entities to submit either a zero nomination if a BB Facility Operator has an agreement with a BB Shipper to treat no provided nominations as a zero or the last known forecast provided by the shipper where the</p>

		market and add to inaccuracy of information in the market if a facility operator is forecasting shippers' nominations and forecasts.	<p>(iv) Known maintenance activities</p> <p>(v) Recent trends in gas flows</p> <p>For the avoidance of doubt, where a BB Facility Operator has an agreement with a BB Shipper that includes a clause noting no nomination is a zero nomination for the operating purposes of the BB Facility Operator, this is considered a nomination by the BB Shipper and satisfies 6.4.2(d).</p>	BB shipper has not provided forecast nominations.
6.4.2(d) Nominated and forecast delivery information for BB pipelines	SEA Gas	<p>Shippers currently provide weekly nominations to SEA Gas once a week for the following week. For 18 years of service, in almost all instances the quantity supplied for each weekly nomination provided has been identical for every day in that week. Further, this weekly nomination can bear little resemblance to the actual nominations required on that day when this data is updated on the day prior.</p> <p>In SA, much of the gas that is delivered on behalf of shippers is for consumption in gas-fired power generation – therefore, for SEA Gas or MAPS to provide any informed input into forecast gas flows would require them to have a detailed understanding of the relevant electricity supply / demand dynamics. Note also here that AEMO frequently intervenes in the SA electricity market by instructing gas fired generation to dispatch in order to address system security issues (in turn impacting gas demand), and it is not possible for pipeline operators to determine in advance whether or not this is likely to occur.</p> <p>Similarly, in the case of SEA Gas, we service both the SA market and the Victorian markets. The degree to which gas flows to</p>	The BB reporting entity is required to provide 7 day Forecasts, including where there are no nominations for that facility. Where there are no nominations for that facility, a BB reporting entity may replicate the last known forecast provided to them by the shipper in their most recent nomination submission..	<p>AEMO notes the respondent's comment.</p> <p>According to rule 183, a BB reporting entity must provide to AEMO the 7-day forecasts if BB shippers have provided forecast nominations. For the avoidance of doubt this information is to be based only on information provided by BB shippers and does not represent the BB reporting entity's forecast.</p> <p>AEMO are happy for the BB procedures to align with this rule by allowing BB reporting entities to submit either a zero nomination if a BB Facility Operator has an agreement with a BB Shipper to treat no provided nominations as a zero or the last known forecast provided by the shipper where the BB shipper has not provided forecast nominations.</p>

		<p>one or the other is not necessarily a function of the day of the week / time of the year / weather, etc. but could be substantially influenced by the specifics of shippers' gas portfolios and therefore how they elect to service their demand on the day. SEA Gas is unable to predict shipper behavior in this context.</p> <p>Accordingly, any requirement for SEA Gas to provide forecasts in the absence of nominations from its shippers will result in nothing other than guesswork and this may well do more harm than good.</p>		
6.4.2(e)	APA	<p>Nominated and forecast delivery information for BB pipelines</p> <p>APA agrees with AEMO's exclusion of auction services. APA suggests that AEMO extends this to interruptible or as available services as nominations and forecasts are not possible for these services until after the Day Ahead Auction (DAA) has been run at 7pm. For the same reason that the auction services have been excluded from this obligation to provide nomination and forecasts, it is not possible to provide nomination and forecasts for interruptible and as available services as these are dependent on what has been won in the DAA.</p>	<p>(e) For a BB auction facility, the BB reporting entity is not required to include in its 7 day Forecasts any quantities of gas which may be injected into or withdrawn from the pipeline in respect of an auction service or interruptible/as available services.</p>	<p>AEMO notes the respondent's comment.</p> <p>AEMO will be leaving this clause as is</p>
6.4.2(e)	APGA	<p>Beyond Firm Haulage Forecasting</p> <p>APGA notes the inclusion of BB Procedures section 6.4.2 (e) which seeks to address the inability to forecast non-firm haulage, in particular haulage under auction services. This clause has the opportunity to address other</p>	<p>(e) For a BB auction facility, the BB reporting entity is not required to include in its 7 day Forecasts any quantities of gas which may be injected into or withdrawn from the pipeline in respect of an auction service or a <i>lower tier service</i>.</p>	<p>AEMO notes the respondent's comment.</p> <p>AEMO will be leaving this clause as is</p>

		forms of non-firm haulage, such as interruptible services. Services which are unable to be scheduled until after auction services are scheduled experience the same forecasting challenges as auction services. D		
6.4.2(e)	Jemena	<p>Further to the feedback previously provided by Jemena and APGA on this clause, we appreciate AEMO's acknowledgement of the challenges (information asymmetries) faced by pipeline operators in relation to forecasting customers' behavior, and we appreciate the changes made to this clause in response to this feedback to date.</p> <p>Following engagement with APGA, Jemena supports APGA's proposed further clarification to clause 6.4.2(e) to allow quantities associated with interruptible services (<i>lower tier services</i> as defined by NGR rule 647) to also not be required to be included in any forecast provided by a pipeline operator.</p> <p>We also look forward to AEMO's response to the request for clarification raised by Jemena on 20 September regarding the intended operation of clause 6.4.2.</p>	(e) For a <i>BB auction facility</i> , the <i>BB reporting entity</i> is not required to include in its 7 day Forecasts any quantities of gas which may be injected into or withdrawn from the pipeline in respect of an auction service or a lower tier service	<p>AEMO notes the respondent's comment.</p> <p>AEMO will be leaving this clause as is</p>
6.4.2(f) and (g)(i)	APA	<p>Nominated and forecast delivery information for BB pipelines</p> <p>The extent of data that is provided by a Facility Operator such as APA for multiple pipelines and many shippers, it is unreasonable for a Facility Operator to calculate let alone update material changes to nominations and forecasts 7 days out. In addition, AEMO's systems may not be able to</p>	(f) The BB reporting entity must update the information provided if there is a material change, including changes that occur within the gas day based on a frequency determined as reasonable by the BB Facility Operator .	<p>AEMO notes the respondent's comment.</p> <p>According to rules 183 and 165(3) a BB reporting entity must update nominated and forecast delivery information for BB pipelines that it has provided to AEMO as soon as practicable after the BB reporting entity becomes aware of the material change.</p> <p>AEMO will not be adjusting clause 6.4.2(f) as this would allow BB reporting entities to not</p>

		accommodate the constant updating of data that this would create. What is more achievable is for a facility operator to report a few times a day to capture those changes by Shippers that have occurred since the last submission. This is more achievable and has been reflected in the updated wording of 6.4.2(f).		update nominated and forecast delivery information for BB pipelines as soon as they are aware of a material change
5.1	Jemena	<p>We note the clarification provided by AEMO during the stakeholder workshop on 14 September in response to Jemena’s earlier question regarding availability of methods to submit data to the BB.</p> <p>Our key concern was to ensure that facility developers had the ability to submit information in a csv file—either via email in the case of a participant with a simplified registration, or via the Markets Portal in the case of a participant with a full registration. Based on AEMO’s clarification, we are comfortable that this issue has been addressed.</p>		AEMO notes the respondent’s comment.
r 190CA r 141(2C)	APLNG	<p>Gas seller For an LNG export transaction – a person with an obligation under the transaction to supply LNG</p> <p>For each short-term LNG export transaction, the gas seller must provide AEMO “short term LNG export transaction information” (r 190CA). Information includes (r 141(2C)):</p> <ul style="list-style-type: none"> • identity of the parties and which is the gas seller; • trade date; 	<p>1. Firstly and most critically, if there is only one LNG seller at any given point on the East Coast, we seek clarification about what data is intended to be published. We submit that it will not be possible to anonymize data where only one Seller is involved and submit that price should not be published as this is not appropriate from a competition law perspective. We note in the “Attachment F – BB Aggregation Methodology”, that if there are less than three spot cargoes in a month, there will be no price published. However,</p>	<p>AEMO notes the respondent’s comment.</p> <p>AEMO will investigate restricting the publication of this information to a quarterly basis to avoid individual updates from being able to be back calculated.</p> <p>The price will be published as a volume weighted price for the reporting period which will be calculated using the free on-board prices and transaction quantities that are submitted to AEMO.</p>

		<ul style="list-style-type: none"> • supply period; • transaction quantity (in PJ); • the LNG export facility at which the LNG is loaded; • the free on-board price for the LNG (in \$/GJ), excluding any amount on account of GST, determined as at the trade date; and • whether the price varies by reference to a change in the value of an index or rate. 	<p>this may not always be enough to anonymize price. For example if we sell two spot cargoes and QCLNG sell one cargo, then as between us we would be able to calculate the other's price.</p> <p>2. We wish to enquire as to how the price will be published. For example you reference the "volume weighted price", which will be based on a floating index. Will you therefore report based on the realized price?</p> <p>We note there is a requirement to report "free on-board price for the LNG (in \$/GJ), excluding any amount on account of GST, determined as at the trade date". For DAT or DES cargoes, we intend to use the calculation mechanism which is provided in the export declaration for each cargo (within 7 days). At a basic level, it involves adding the shipping cost and conversion to Australian Dollars. Please can you confirm that this approach will be acceptable to AEMO or whether a different standardized mechanism will not be required through the BB procedures.</p>	<p>Using a different calculation mechanism to determine the price rather than providing the FOB price will not be accepted.</p>
9.1 (b)	APA	<p>Facility development project reporting</p> <p>Updating of these projects once per year is sufficient to the market. It is unreasonable to require reporting entities to be constantly assessing their expansion and extension projects to determine if the data has changed. In addition, AEMO will have updated information provided on these projects as part of the GSOO submission in September of each year as well which will act as an update. If necessary, this clause could seek an update in September to coincide with a review of the GSOO which could potentially be</p>	<p>(b) Information for a facility development project must be updated if it is no longer accurate.</p>	<p>AEMO notes the respondent's comment.</p> <p>As per rule 190F a BB reporting entity must update the facility development project information provided to AEMO if that information is no longer accurate</p> <p>However, BB reporting entities are not obligated to provide these updates immediately, only as soon as practicable after it comes to their attention that the information provided to AEMO is no longer accurate and needs to be updated.</p>

		accommodated and not as burdensome as an update if the information is no longer accurate.		AEMO will not be removing clause 9.1(b)
10.3 'Trade Date' Definition NGR 141(1)	APLNG	We note that 'trade date' is defined to mean "for a transaction, the date on which the transaction is entered into". Could you please confirm what the trade date would be where a transaction is entered subject to conditions? We expect the 'trade date' should be the date the contract becomes unconditional, but we would be grateful if AEMO could please clarify this point.		AEMO notes the respondent's comment. The trade date will always refer to the date when the transaction was made

Section 3³ – Additional feedback.

Topic	Respondent	Document & Section	Issue/Comment	AEMO response
Do you have any comments with regards to AEMO's further amendments of the Linepack/capacity adequacy (LCA) flags clauses?	APA		See comments in Section 2 above.	AEMO notes the respondent's comment and has responded to them above.
	SEA Gas	Gas Bulletin Board Procedures 6.3.2 Linepack Capacity Adequacy	It is unclear what the aim of the Amber flag is with the new wording. Previously it was thought to indicate potential constraints on a pipeline. The new wording will capture unique instances not reflecting the ability of the pipeline to meet nominations and create more uncertainty than clarity.	AEMO notes the respondent's comment.
Does your organisation have any feedback with regards to the Guides and/or forms that are being updated to facilitate the proposal?	Shell	BB Aggregation Methodology 2.3	<p>Rule 195C requires AEMO to only publish information on gas transactions (including short term LNG export transactions) "in a form that so far as practicable does not identify the person to whom the information relates or allow that to be determined"</p> <p>Shell is of the opinion that the current aggregation methodology for short term LNG export transactions does not meet the requirements of Rule 195C due to the small number of LNG sellers in the east coast market.</p> <p>To ensure anonymity, we propose that transactions are only reported when there are 3 or more transactions across at least 3 LNG sellers.</p>	<p>AEMO notes the respondent's comment.</p> <p>AEMO will investigate restricting the publication of this information to a quarterly basis to avoid individual updates from being able to be back calculated.</p>

³ Note - This feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process

Topic	Respondent	Document & Section	Issue/Comment	AEMO response
			The current worded methodology may enable sellers to identify one another depending on their own level of activity in this space.	
	APA	BB Data Submission Guide	Can AEMO please provide clarity on the new column 'Active Flag' as added to STCO (4.1) and Nameplate Rating (4.7) reports? What does this mean and why is it required? If the reports can be provided (and accepted by AEMO) without this column?	<p>AEMO notes the respondent's comment.</p> <p>The Active Flag is set to either 1 or 0. 1 representing that the record is active (included in published reports), and 0 representing that the record is inactive (remains in database but is not included in published reports). This is required to stop inactive records from updating via the rollover functionality. The data can be provided and accepted by our systems without this column as it has a default value of 1 if it is not specified in the submission</p>
			Removal of N/A value for Flow Direction column in Daily Production Flow (4.2) report and only allow receipt, delivery and compression values. Can AEMO please advise what it is expecting to be provided for bi-directional pipelines and where flows are zero is AEMO still expecting a directional stream of receipt, delivery and compression?	<p>AEMO notes the respondent's comment.</p> <p>AEMO expects both a receipt quantity and a delivery quantity to be provided for bi-directional points on a pipeline. A flow direction of either receipt or delivery will also need to be provided where flows are zero for a connection point, the actual quantity will just be set to zero. A flow direction of compressed will only be provided for BB compression facilities.</p>
			Can AEMO please reword this sentence to clearly explain what it is expecting under Updated Capacity Description for BB compression facilities in Nameplate Rating (4.7) report. <i>BB compression facilities submit a capacity quantity, and they must also provide a Capacity Description of other maximum quantities under other standard operating</i>	<p>AEMO notes the respondent's comment.</p> <p>AEMO will reword this section of the BB Submission Guide</p>

Topic	Respondent	Document & Section	Issue/Comment	AEMO response
			<p><i>conditions including a description of those conditions including expected inlet and outlet pressures.</i></p> <p>It is not clear what AEMO mean by capacity description of other maximum quantities under other standard operating conditions. There is usually only one standard operating condition of which there is standard inlet and outlet pressure. If AEMO is expecting inlet and outlet pressures for other operating conditions, this could be endless and is not reasonable to expect to be provided.</p>	
	Shell	BB Data Submission Guide 3. Data Provision Requirements, Table 1	Table is incomplete.	AEMO notes the respondent's comment. The current draft of the BB Data Submission Guide is still incomplete; this table will be completed.



NOTICE OF DECISION (NOD)



DOCUMENTATION CHANGES

Versions of the Procedures and Guides showing tracked changes between the current version and the new version are attached to this NoD and available on the consultation page [here](#). [Blue underline](#) means addition and ~~red strikeout~~ means deletion.