

Fact Sheet

This fact sheet summarises AEMO's responses to the Frequently Asked Questions with regards to the Gas Transparency Measures consultation and implementation.

While the Australian Energy Market Operator (AEMO) has taken all reasonable care in the preparation of this document, the information should not be construed as advice.

The National Gas Law, the Rules and the BB Procedures prevail over this document to the extent of any inconsistency.

Frequently asked questions

What are the implementation milestones?

As outlined in the [Notice of Decision](#) (NoD), the key implementation milestones are as follows:

- BB Procedures for the purpose of the new registration rules went live on 3 November 2022.
- The deadline for participants to apply for registration was 1 December 2022.
- New GSOO procedures will go live on 15 February 2023.
- New BB reporting obligations will begin on 15 March 2023.

When will the market trial take place?

The market trial will occur from 16 January to 3 February 2023.

Where can I find the registration forms?

The BB Facility registration form, Facility Development Project registration form and Gas Field Interest registration form are available on the GBB facility registration page ([here](#)). The application form for exemptions is also located on the same page under the heading *Applying for an exemption*. The updated registration form and guide are available on the registration page ([here](#)).

NGR 190CB captures not only wholesale transactions but also transactions between Retailers and C&I customers where that C&I customer consumes over 10TJ per annum. Would these transactions be required to be reported to the bulletin board?

Yes. Note that this reporting requirement covers short term gas supply transactions which are defined in the rules as “a gas supply transaction under which the end of the supply period is before the first anniversary of the start of the supply period.”

This reporting requirement wasn't covered explicitly in the BB Procedures as we typically do not duplicate Rule requirements in the BB Procedures, and in any case of inconsistency between the Rules and Procedures, the Rules take precedence over the Procedures.

Short term gas transactions – how should participants report swaps which are transacted as two discrete sales both with a sales price and no swap fee?

Participants need to report on those transactions in which they are the gas seller. It is envisaged that both parties to the swap will be providing information independently – this is consistent with the definition for



a gas seller outlined in the Rules and 190CB which covers short term transaction reporting.

Rule 141(2B) outlines the information to be included in the short-term gas transaction information (which is applicable for swaps).

Short term gas transactions – how should participants report sales and swaps with multiple delivery points in the one transaction?

Participants may only report them as one transaction if the agreement specifically references a primary delivery location in the transaction. If this is the case, the participant must only report to AEMO the total Maximum Daily Quantity (MDQ) and the Transaction Quantity (TQ) at the primary delivery location.

If the contract has multiple delivery locations (without a primary delivery location) participants must report the different delivery locations as separate transactions with the best estimate of the MDQ and TQ to those locations. Participants must ensure that the aggregate MDQ and TQ of all locations does not exceed the total contract MDQ or TQ. Practical example below:

A supply contract has a TQ of 100 TJs and the MDQ is 10 TJ/day. The agreement allows the buyer to have full flexibility where they want to receipt the gas. Seller is unsure where the buyer will prefer to receipt the gas, thus (per 190CB (2)) seller has assumed a 75%/25% split between location A and B

Location A TQ = 75 TJs with an MDQ of 10TJ/day

Location B TQ = 25 TJs with an MDQ of 10TJ/day

Transactions for Location A and Location B would need to be submitted to AEMO as separate transactions.

Short term gas transactions – is there a standardised naming convention for Delivery / Receipt locations?

No; AEMO would prefer you use an existing location used on the Gas Bulletin Board ([here](#)), however if no such location exists, as per section 10.4(d)(ii) of the

BB Procedures, reference a BB facility and also add some information explaining where the transaction occurred (e.g. RBP IPT)

Short term gas transactions – Do participants need to report all types of transactions (firm, as available, interruptible etc?)

Firm – Yes

Interruptible – No

As Available – See below

Participants only need to report on the transactions if/when a physical delivery obligation for the seller is required. If an As Available transaction is nominated, then it is assumed that would become firm.

Participants would be then required to report this as a short-term gas transaction.

These As Available transactions that are reportable (when nominated and deemed to be firm) would require the seller to provide the 'trade date' as the date the transaction was deemed to become firm (generally the date the nomination was accepted).

Short term gas transactions – What if I entered into a transaction and my sale is linked to an exchange (e.g., STTM) settled price months out from the supply obligation date?

Participants are requested to provide the exchange price (e.g., STTM) price at the time of the transaction (do not leave this blank or with a 0). Participants then need to provide the additional details of the transaction explaining that the price is linked to the (e.g.) settled BNE STTM price for the delivery date less \$0.60/GJ

Short term gas transactions – where MDQs vary for different times of the year (e.g., seasonal)

For all transactions that vary in MDQ, they must be entered as a separate transaction, see working example below

Q1 (Jan, Feb Mar) – 10TJs/day

Q2 (Apr May Jun) – 40TJs/day



Q3 (Jul Aug Sep) – 40TJs/day

Q4 (Oct Nov Dec) – 10TJs/day

This would require the participant to enter 3 different transactions for Q1, Q2 to Q3 and Q4. It should be noted that Q2 to Q3 could be aggregated as one transaction, however Q1 and Q4 would need to be entered as separate transactions. Note: If the price varies for each month (within the quarter) this would take precedence and the transaction would need to be reported as 12 separate transactions (for each month)

Short term gas transactions – if a participant enters a transaction for supply on the same day, when do we have to report it?

You would report the transaction to AEMO on the same day. In the unlikely event that a transaction is agreed to after the beginning of the supply date (e.g., caused by approval delays), the (latest date) participant is obligated to provide the details of the transaction is the first date of supply to their buyer

Short term LNG transactions – If the sale is a DES (Delivered ex-ship) or DAT(Delivered at terminal) price, how to report as FOB (Free on board)?

Provide the FOB price (calculated by the participant), provide detail in the PriceStructure of the DES/DAT price and the estimated shipping costs. Simply put the calculation would be DES/DAT price less shipping = FOB price

Has AEMO updated its criteria for classification (BB Procedures 3.7.1) and the Linepack/Capacity Adequacy Flags (BB Procedures 6.3.2)?

As part of the NoD, AEMO updated the criteria for classification as well as the definitions of the Linepack/Capacity Adequacy Flags in the BB Procedures as detailed in the NoD. Please refer to the

response given to APGA with regards to the Criteria for Classification and the response given to APA with regards to the Flag descriptions in the NoD and the relevant section of the BB Procedures for detail on this matter.

With regards to “short term LNG export transaction information” (NGR 190CA), how will AEMO ensure anonymity of reports?

Reports will be issued on a quarterly basis where there are two or more sellers and three or more transactions. If these conditions are not met, there will be no report for that quarter.

With regards to short-term gas supply transactions, some prices are subject to a particular index or price escalation mechanism. In these cases, do the transactions need to be reported only once, rather than every time the price changes, noting the Price Structure and Price Escalation fields aren't Mandatory?

There are two relevant pieces of text in the BB Procedures:

- Section 10.4(b)(i) outlines that the price, or the formula used to determine the price in the contract, is to be reported at the trade date of the transaction.
- Section 10.4(c) outlines that where the price of the transaction varies by reference to a change in the value of an index or rate, that index or rate must be specified in the submission.

With these items being accounted for, transactions should only be reported once. If the price formula or the reference to the index were to change, then as per Section 10.4(e) of the BB Procedures the information would need to be updated.



Where can the “Spot Trade” table(s) be accessed?

There will be three reports on BB short term gas transaction reporting as follows:

- 2 public reports:
 - Short term transactions; and
 - Short term swap transactions
- Reporting entities will have access to 1 private report that reflects the detailed data that they have submitted (covering short term transactions and swaps)

The best way to access the data is to setup an API connection and leverage off the data interchange that AEMO has created for participants. For more information visit the AEMO [API Portal page](#). Alternatively, AEMO will be publishing the information publicly on the Bulletin Board.

When will the Guides and other documentation associated with the consultation be released?

The Submission Guide and the Reports Guide have been published on the AEMO website on the Procedures and guides page [here](#).

I am already registered to participate in the BB. Do I have to reregister?

All BB Reporting Entities must be registered, no matter what role they play in the market. AEMO needs to be able to identify who the BB Reporting Entity is.

If a participant is already registered and their facilities are otherwise unchanged, they do not need to reregister. Participants will be transitioned to the new registration capacities, such as “BB Reporting Entity”, automatically. Details on these transition arrangements are covered in NGR 79.

Short Term gas transactions - if I have to submit (as an example) 36 different transactions for one trade (12 prices for each month with 3 delivery points), how would I be able to track it?

Each submission will have an ID associated with it; however, we do acknowledge that 36 different transactions could be related to one particular trade. AEMO has taken feedback from participants and deployed a “Description” field to allow participants to track their submissions easily. This field is a Varchar (free text) and participants are encouraged to use a standardised format for submissions (e.g. Buyer name TN#xxx mmm-yy), however this format is not mandatory as the field has been designed in whatever way you would like to use it.

Short Term gas transactions – Do we need to report on transactions that have been entered into prior to 15th March 2023 go live date?

Firm – No

As Available – yes if the firm delivery obligation was created on or after the 15th of March 2023 (regardless if the contract was signed prior to this date)

Short Term gas transactions – If the contract has an MDQ higher than the total amount nominated what volume do we report?

If the transaction has an MDQ higher than the total amount nominated by the counterparty, the total quantity nominated would be the ‘transaction quantity’ and the ‘MDQ’ would be the ‘maximum quantity that can be required to be supplied on any gas day’

Short Term gas transactions – are gas banks required to be reported on?

No



Where can I find more information?

For further information, please see the consultation page [here](#) or reach out to AEMO at GWCF_Correspondence@aemo.com.au.

For any further enquiries, please contact AEMO's Information and Support Hub via

- supporthub@aemo.com.au or
- call 1300 236 600

This fact sheet is only a summary of the GTM arrangements. Registration applicants are responsible for ensuring they understand the relevant provisions of the National Gas Rules and other applicable instruments, which prevail in the case of any inconsistency.