



## Response template for IIR on DWGM Procedure changes for Hydrogen and DCF Rule Changes

Email responses to: [GWCF\\_Correspondence@aemo.com.au](mailto:GWCF_Correspondence@aemo.com.au)

Review comments submitted by: *AGL*

Confidential: No

Date: *28 Nov 2023*

Contact Person: *Mark Riley*

Please complete sections 1 and 2.

### Section 1 - General Comments on the Procedure changes

Topic	Please Provide Response Here
<p>General Comments</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 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>	<p>Broadly AGL supports AEMO's assessment, except in relation to the management of HV Zone changes. AGL Notes that the only discussion on the matter of dynamic HVZs that has been had is between AEMO and the Distribution Networks, although retailers are users of this information.</p> <p>AGL notes that AEMO has proposed that AGL raises a GMI on the issues of retailer notification of HVZ changes. AGL does not accept this response as acceptable. This initiative is being driven by AEMO and to ignore issues raised by one key sector of the gas market and then ask that that sector to identify a change, without having been involved in the discussions and without clarity on the magnitude or frequency of change seems to be a very poor outcome, which is most likely to lead to downstream issues and likely additional cost on the industry.</p>

Section 2 - Feedback on the documentation changes in the Procedures

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Wholesale Market Connection Approval Procedures

Procedure Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No further comment		

Wholesale Market Distribution Procedures (including Distribution Operation Coordination Procedures and Net Bidding Facility Procedures)

Procedure Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No further comment		

Wholesale Market Gas Quality Procedures

Procedure Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No further comment		

Wholesale Market Maintenance Planning Procedures

Procedure Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No further comment		

Wholesale Market Management Procedures (including Additional Reporting Procedures, Electronic Communication Procedures, Gas Ownership Rules Procedure and Rule Change Consultation Procedures)

Procedure Clause #	Issue / Comment	Proposed text <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No further comment		

Wholesale Market Metering Procedures (including the Metering Uncertainty Limits and Calibration Requirements Procedures, Energy Calculation Procedures, Metering Communications Procedures, Installation Database Procedures, Metering Installation Coordination Procedures, Metering Register Procedures and Data Validation Procedures)

Procedure Clause #	Issue / Comment	Proposed text <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No further comment		

**Wholesale Market Operation Procedures (including the Accreditation Procedures, Administered Pricing Procedures, Capacity Certificate Auction Procedures, Capacity Certificate Trading Procedures, LNG Reserve Procedure and Gas Scheduling Procedures)**

Procedure Clause #	Issue / Comment	Proposed text <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No further comment		

**Wholesale Market Settlements Procedures (Including the Ancillary Payment Procedures, Uplift Payment Procedures, Compensation Procedures and DUAFG Procedures)**

Procedure Clause #	Issue / Comment	Proposed text <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No further comment		

Wholesale Market System Security Procedures

Procedure Clause #	Issue / Comment	Proposed text <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
	No further comment		

## Attachment D – User Guide to MIBB Reports

INT Report	Issue / Comment	Proposed text <span style="color: red;">Red <del>strikeout</del></span> means delete and <span style="color: blue;">blue underline</span> means insert	AEMO Response (AEMO only)
INT139	No further comment		
INT139A	<p>AGL notes that INT139A will now be generated based on a trigger event. However, it is unclear what the minimum event would be that would not allow the trigger to complete – eg one HVZ failing to calculate ?</p> <p>What will occur then ?</p> <p>Partial reporting, participant notice, ?</p>		
INT188	No further comment		
INT140	No further comment		
INT1176	No further comment		
INT240	No further comment		
INT241	No further comment		