



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

Email responses to: GWCF_Correspondence@aemo.com.au

Review comments submitted by: *AGL*

Confidential: No

Date: *16 October 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 PPC 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>AGL is generally supportive of AEMO's assessment of this proposal from a wholesale perspective.</p> <p>AGL does note that there seems to be no mechanism within the retail changes to ensure that Retailers are kept aware of a MIRS HVZ and any changes to that HVZ as customers churn or HVZs are changed. This lack of information will impact Retailers forecasting outcomes, which in turn impacts their origination and bidding processes. This has been flagged in the retail response.</p>
<p>Wholesale Market Connection Approval Procedures</p>	<p>AGL supports the assessment.</p>
<p>Wholesale Market Distribution Procedures, which include:</p> <ul style="list-style-type: none"> - Distribution Operational Coordination Procedure - Net Bidding Procedures 	<p>AGL supports the assessment.</p>
<p>Wholesale Market Gas Quality Procedures</p>	<p>AGL supports the assessment.</p>

Topic	Please Provide Response Here
Wholesale Market Maintenance Planning Procedures	AGL supports the assessment.
Wholesale Market Management Procedures, which include: <ul style="list-style-type: none"> - Additional Reporting Procedures - Electronic Communication Procedures - Gas Ownership Rules - Rule Consultation Procedures 	AGL supports the assessment.
Wholesale Market Metering Procedures, which include: <ul style="list-style-type: none"> - Metering Uncertainty Limits and Calibration Requirements Procedures - Energy Calculation Procedures - Metering Communications Procedures - Installation Database Procedures - Metering Installation Coordination Procedures - Metering Register Procedures - Data Validation Procedures 	AGL supports the assessment.
Wholesale Market Operation Procedures, which include: <ul style="list-style-type: none"> - Accreditation Procedures - Administered Pricing Procedures - Capacity Auction Procedures - Capacity Trading Procedures - LNG Reserve Procedures - Gas Scheduling Procedures 	AGL supports the assessment.
Wholesale Market Settlement Procedures, which include: <ul style="list-style-type: none"> - Ancillary Payment Procedures - Uplift Payment Procedures - Compensation Procedures - DUAFG Procedures 	AGL supports the assessment.

Topic	Please Provide Response Here
Wholesale Market System Security Procedures	AGL supports the assessment.

Section 2 – Specific Questions from PPC

Topic	Please Provide Response Here
<p>Question 1: Do participants consider the 5TJ/d constraint materiality threshold for inclusion of a constraint in the scheduling window? For the avoidance of doubt, this proposal applies to distribution connected facilities (under the distribution operational coordination procedure) and to DTS connected facilities (under the gas scheduling procedures).</p>	<p>At this stage, 5TJs seems like a reasonable quantity, but this quantity should be tempered with overall load levels on that network section. If its 5TJs on a 1000, it may be appropriate, but if its 5TJs on 10TJs, then potentially this level is too high. This might apply to new network sections with low load or following a network reconfiguration. AGL suggests that some assessment should be undertaken when facilities are connected to the Distribution network to determine the impact of such a constraint threshold and whether the threshold should be adjusted for that network area or a period of time.</p>
<p>Question 2: Do participants consider the 5TJ/d constraint materiality threshold for sending a SWN is appropriate as AEMO already publishes all constraints at schedule approval? For the avoidance of doubt, this proposal applies to distribution connected facilities (under the distribution operational coordination procedure) and to DTS connected facilities (under the gas scheduling procedures).</p>	<p>Whatever threshold is established, a SWN is an appropriate notification process. This may be particularly important for the first few connected facilities. AGL suggest that this be reviewed with participants after the first one or two facilities are connected.</p>
<p>Question 4: Do Registered Participants agree that a 3 monthly communication limit is appropriate for routine notifications concerning Responsible Persons notifications under rules? If not please nominate a alternate timeframe (including a justification) for routine communications?</p>	<p>AT this stage a 3-monthly process seems appropriate. Again, experience with Distribution connected facilities will determine if this needs amendment.</p>

Section 3 - 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 Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
1.1	DDTSSP is not defined or enunciated before acronym used nor is it listed as a defined term.		
Fig 1	having the process end on rejection of application is an incomplete concept, as the rejection is likely technical and further information is sought.		
3.6	The safety assessments (ie loss or interruption in any circumstance) is far reaching and inconsistent with managing hazards and risks to ALARP levels.		

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

Procedure Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
2.2.4	If a request for a review is warranted, then the party seeking the review should be notified by AEMO that the Distribution Network has been requested to undertake such a review		
2.3	Check heading – has 2.2.1 in title		
3.3	Can the facility operate in quantities of less than 1 GJ/hour or only whole GJs ?		
3.4	As the wholesale market operates in GJ/hour, are the hourly quantities in this section in GJ or less than a GJ ?		
3.9	Check heading – has 3.9 in title		

Wholesale Market Gas Quality Procedures

Procedure Clause #	Issue / Comment	Proposed text <i>Red strikethrough</i> means delete and <i>blue underline</i> means insert	AEMO Response (AEMO only)
2.5.1	Final sentence – 2 x full stops		
2.7.5(c)	<p>Likely lack of contact details. <i>A responsible gas quality monitoring provider</i> is unlikely to have current or correct contact details for all registered participants.</p> <p>The responsible Gas Monitoring Provider has already notified AEMO of planned changes to any monitoring system. It is more efficient for AEMO to provide that notification to Registered Participants.</p>	<p>(c) <u>After being advised of the following information by the</u> The <i>responsible gas quality monitoring provider</i> <u>AEMO</u> must send notifications to <i>Registered participants</i> of any change, in regard to a <i>gas quality monitoring system</i>, including the following information:</p>	
2.7.5(d)	<p>Clause (d) does not remove the obligation embedded in clause (c) for the <i>responsible gas quality monitoring provider</i> to send notifications, it simply allows an additional pathway for notification to be sent.</p> <p>A more efficient and effective process is for the provider to supply the information and AEMO to notify the relevant participants through its channels.</p>		

Wholesale Market Maintenance Planning Procedures

Procedure Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
1.3	Grammar – commas in the wrong places	These Procedures, as required by Rule 326(2) of the NGR, must <u>with respect to maintenance,</u> include the following:	
1.3	Paragraphs following (i) Given that the section is numbered, it could be taken that the newly inserted paragraph starting Rule 326A is part of point (i). If it's a new concept, then the section should be re-written with new numbering to clarify the differentiation.		
1.4.2	Clarity - days	The term days is used within the definitions and procedures, but it is not clear if these are calendar, gas or national days. For the avoidance of doubt, it is suggested that the term days is clarified – most likely as Victorian Business days.	
2.3.1	It is unclear if this section is intended to capture maintenance works for metering installations and gas quality monitoring as 2.2(a) and (d) are the only section which clearly call out facility operators. The same issue applies in other parts of the document.	Facility operators <u>Parties identified in Clause 2.2</u> must send a notification to AEMO of maintenance where, in AEMO's reasonable opinion, work carried out by the <u>relevant party</u> facility operator may affect:..... Facility operators <u>The relevant parties</u> must consult with AEMO if they are unsure if work is considered maintenance., or alternatively the facility operator <u>relevant party</u> may	
2.3.3	The final paragraph which requires all the same timings as a DWGM facility operator seems to be tacked on to the section.	2.3.3. Timing of forecast maintenance submissions <u>The parties identified in Clause 2.2</u> DWGM facility operators that intend to perform maintenance must provide AEMO with notification of the maintenance forecasts in accordance with rule 324(4), given as follows: Strike (e)	

Wholesale Market Maintenance Planning Procedures

2.3.4	Same issue as 2.3.1		
2.3.4	<p>Statement around updated maintenance as planned or unplanned</p> <p>The definitions of planned and unplanned use a 5 day window as the determinant. This statement seems to allow AEMO more flexibility in determining planned or unplanned maintenance.</p> <p>As long as an update is provided more than 5 days prior to the scheduled work commencing, then the work should be treated as planned maintenance.</p>		

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 Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
1.4.1	Glossary – Term DTS SP This term is inconsistent with the term used in other procedures – DTSSP – Suggest aligning terms through procedures.		
2.1 Purpose	Explanation convoluted and not clear. CI 2.3 provides a much clearer explanation of why these parties are identified.		
3.3.4 (a)	Wording	AEMO will follow <u>use</u> the following	
3.3.4 (b)	Proposed process to publish a change AGL notes the process to provide 10 b/days notice of a change, but considers that if the change involves changes to bidding systems, report usage and other more complex processes, 10 b/days is unlikely to be sufficient time for a Registered Participant to make system changes to implement the changes made by AEMO.		

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 Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
2.4.2 (c)	There should be a clear time frame for procedures to be reviewed and a participant notified AEMO should also advise the participant if the procedures meet the requirements of these Procedures.	(c) AEMO will review the Calibration Procedures submitted to it within 10 business days of receiving them and notify the <i>responsible person</i> of the result in writing;	
2.4.2(c)	If AEMO advises the participant that the submitted procedures do not meet the requirements of these procedures, the information detailing the points of failure should also be provided.	(c) If the Calibration Procedures, submitted under (b) above, do not meet the requirements in these Procedures, AEMO will notify the <u>responsible person participant</u> in writing <u>together with information as to why the Calibration Procedures fail to meet the requirements of these Procedures and request they be amended and resubmitted.</u>	
2.4.2(d)	Clarity of Obligation	(c) <u>If the Calibration Procedures, submitted under (b) above, do not meet the requirements in these Procedures,</u> the <i>responsible person</i> must resubmit the Calibration Procedures to AEMO within 20 business days of the notice, or such other date as agreed with AEMO.	
2.4.2(f)	Amend numbering		
2.5 (b)	Grammar	Plural For the avoidance of doubt, rule 298(2) requires that a metering installations at a distribution delivery points (excluding distribution connected settlement metering points as per (b) above) and heating values (as per (a) above) must satisfy the uncertainty limits Or singular rule 298(2) requires that a metering installation at a distribution delivery points	

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)

3.6.1	Simplify	For an Where the installation <u>where is such that</u> a temperature probe has not been installed, the actual temperature will be deemed to be 15°C and this figure will be used in calculations.	
3.6.2	Grammar	The meter's heating value zone is assigned based to <u>on</u> the CTM primarily supplying the site.	

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 Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
1.4	Glossary – Term DTS SP This term is inconsistent with the term used in other procedures – DTSSP – Suggest aligning terms through procedures.		

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

Procedure Clause #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
3.8.5 (c)	Cross reference not working		

Wholesale Market System Security Procedures

Procedure Clause #	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
4 (d)	It is better not to use an acronym in this list	Expand WZ to Withdrawal Zone (WZ)	
4.1 / 4.6	Consistency of term across procedure	'Gas-fired power generator' or 'gas fired generator'	

Attachment D - DWGM - Technical Specification

INT Report	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response (AEMO only)
general	As there are multiple variances between these reports and the information provided in the User Guide to the MIBB, AGL suggests that this document be retired.		
INT139	AGL notes that this report is scheduled to be retired post 1 May 2024 and suggests that it is left available until settlement revisions are completed for the period ending 1 May 2024.		
INT139A	Check format of gas-date in comment - 30 Jun 2007 or 30-Jun-07		
INT188	The description of this report is inconsistent with the description of this report in the User Guide to the MIBB		
INT140	Value – clarify how the 'ti' relates to start of gas day.	Time interval of the day 1-24 with 1 representing the hour prior to the start of Gas Day – ie 5:00am.	
INT140	Update gas date by removing time to align with example	Gas day being reported e.g. 30-Jun e_2007 06:00:00	
INT140	Update Date example with time	Date and Time Report Produced (e.g. 30 Jun 2007 17:00:00) for consistency with output example	
INT1176	Check format of gas-date in comment - 30 Jun 2011 or 30-Jun-11		
INT1176	Check format of current_date in comment		

INT240	No report to comment on in this document		
INT241	No report to comment on in this document		

User Guide to the MIBB

INT Report	Issue / Comment	Proposed text Red strik means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
INT139	AGL notes that this report is scheduled to be retired post 1 May 2024 and suggests that it is left available until settlement revisions are completed for the period ending 1 May 2024.		
INT140	Value – clarify how the ‘ti’ relates to start of gas day.	Time interval of the day 1-24 <u>with 1 representing the hour prior to the start of Gas Day – ie 5:00am.</u>	
INT 176	Addition of Hydrogen noted		
INT 240	Check data types for <ul style="list-style-type: none"> • MIRN – other reports use VARCHAR10 or Char10 not int 		
INT 241	More clarity on what the field ‘effective date’ applies to – one assumes it is the CTM being mapped to the CTM group		