

Retail Impact & Implementation Report (IIR) - Hydrogen and minor RMP changes



Summary Section

Ref# (if applicable)	Package 3B IN007-21 & IN007-23...		
Impacted jurisdiction(s)	Victoria		
Proponent	Danny McGowan	Company	AEMO
Proponent email	grcf@aemo.com.au		
Affected Gas Market(s)	Retail and Wholesale	Consultation process (ordinary or expedited)	Ordinary
Industry consultative forum(s) used	GRCF and GWCF	Date industry consultative forum(s) consultation concluded	16 October 2023
Short issue title	Minor proposed changes to the Victorian Retail Market Procedures (RMP) as described in AEMO's final recommendation report on extending the regulatory frameworks to include hydrogen and renewable gases. There are also several minor RMP changes that have been included in this consultation that relate to a recent review undertaken by AEMO that should add further clarity to the RMPs.		
Procedure(s) or Documentation impacted	Retail Market Procedures (Victoria)		
IIR prepared by	Danny McGowan, Louise Webb	Approved by	Meghan Bibby
Date IIR published	30 October 2023	Date consultation concludes	28 November 2023
Other key contact information			

aemo.com.au

Impact & Implementation Report (IIR) – Detailed Report Section

Critical Examination of Proposal

1. Description of issue

1.1. Background.

AEMO is amending the Procedures as a consequence of the:

- (a) AEMC's Hydrogen and Declared Wholesale Gas Market (DWGM) Distribution Connected Facility rule changes¹;
- (b) Essential Services Commission (ESC) review of the Gas Distribution System Code of Practice; and
- (c) A review undertaken by AEMO that identified minor amendments that will add further clarity to the RMPs.

Background on each of these changes are provided below.

1.1.1. AEMC's Hydrogen and DWGM Distribution Connected Facility rule changes

In August 2021, Energy Ministers agreed that the national gas regulatory framework be reviewed and extended to accommodate hydrogen, biomethane and other renewable gases. This agreement meant changes are needed to documents that underpin the framework so that they recognise and facilitate natural gas equivalents. This also meant that:

- (a) Jurisdictional officials would review the National Gas Law (NGL), National Energy Retail Law and National Energy Retail Regulations;
- (b) AEMC would review the arrangements in the National Gas Rules (NGR) which include a request to incorporate distribution connected facilities (DCF) into the Victorian declared wholesale gas market (DWGM); and
- (c) AEMO would review its market Procedures for the DWGM, Short Term Trading Market (STTM) and Retail Market (excluding Western Australia).

Those reviews concluded in September 2022 whereby the AEMC and AEMO published final recommended changes to their respective regulatory instruments. AEMO's final recommendation report outlines AEMO's final recommended changes to the each of the above procedures.

In October 2022 the Energy Ministers agreed to amendments to extend the NGL and NERL to hydrogen and other renewable gases.

AEMO is undertaking a consultation on the DWGM's Wholesale Market Procedures required as a result of the AEMC's [review into extending the regulatory frameworks to hydrogen and renewable gases](#) and the AEMC's [DWGM distribution connected facilities](#) rule changes.

¹ The last paragraph in section 1.1.1 provides further details the Retail Market Procedures including information of the consultation approach.

Having considered the recommendation contained in section 4.4 of [AEMO's final recommendation report](#), the recommended changes have been made to RMP. Section 3 of this IIR provides a summary of these proposed RMP amendments. It is important to note that these RMP changes do not have any directly linked system or process changes to do with extending the regulatory frameworks to hydrogen and renewable gases, therefore these changes can be made independently of the broader reform framework mentioned above and the draft National Energy Laws Amendments (Other Gases) Bill 2022 and the AEMC's recommended Rules.

1.1.2. Essential Services Commission review of the Gas Distribution System Code of Practice.

The Victorian Essential Service Commission's review of the Gas Distribution System Code of Practice requires administrative changes to the RMP to be consistent with the Distribution Code.

1.1.3. AEMO's proposed amendments to the RMP.

A review undertaken by AEMO identified that several defined terms within the RMP should be amended to add further clarity to the RMP. AEMO is also proposing to introduce a new guideline to assist participants and other interested parties to understand the scope of certain terms in relation to the Declared Wholesale Gas Market (DWGM), the Victorian Retail Gas Market (VRGM).

1.2. How to make a submission

Anyone wanting to make a submission for this second consultation stage (Retail Impact and Implementation Report (IIR)) are requested to use the response template provided in Attachment C. Submissions are due COB 28 November 2023 and should be e-mailed to grcf@aemo.com.au.

IMPORTANT NOTE-1: Some RMP changes may overlap with Wholesale Market Procedure changes. Details about the Wholesale Market Procedure changes are described IIR – DWGM Procedure changes for Hydrogen and DCF². In relation to feedback on the proposed amendments to the Wholesale Market Procedure changes, please use the DWGM – IIR response template.

IMPORTANT NOTE-2: The scope of works is limited to the initiatives described in this IIR. The scope maybe expanded to pick up other minor typographical errors that are identified. A more thorough review of the other clauses of the Procedures is out of scope for this consultation.

2. Reference documentation

The following Procedures, provided in Attachment A, are being consulted on as part of this Procedure change process. AEMO is also introducing a new guideline, as detailed in Attachment B.

AEMO will only republish documents that change at each stage of the Procedure consultation.

Title	Legal Requirement
Retail Market Procedures (Victoria) Ver 17.0 . Click here to view	Retail Market Procedures (Victoria) required by rule 135EA (1) of the NGR.

² See the note at the bottom of section 3.1 that provide further information about the RMP proposed changes should the NGR and/or the DWGM Wholesale Market Metering Procedures not be made.

As noted in section 1.2 of this IIR, some RMP changes may overlap with Wholesale Market Procedure changes. Details about the Wholesale Market Procedure changes are described IIR – DWGM Procedure changes for Hydrogen and DCF.

3. Overview of changes

The marked up RMP changes are provided in Attachment A of this document which also includes the changes that relate to consultation package 3A (Zonal Heating Value). Attachment B contains a new guide that AEMO will publish on its website that explains the scope of the Declared Wholesale Gas Market (DWGM) and the Victorian Retail Gas Market (VRGM). AEMO has prepared this document to assist participants and other interested parties to understand the scope of term such as declared transmission system (DTS), the declared distribution systems (DDS), as applied in each market.

AEMO has provided the “Attachment C Package 3B IIR Retail Procedure response template” for participants to make their submissions in response to this consultation.

The following table indicates which initiative affects which Procedure and Guide. The clauses of each document that have been updated have had a colour-coded comment applied to them indicating which initiative is related to which change of drafting.

Initiative #	Short description of the issue	Document affected
IN007-21	Victorian Hydrogen integration includes DCF and AEMC Victorian hydrogen review changes. (Note: Includes IN017-22)	RMP
IN007-23	Review Declared Distribution System definition.	RMP New guide

Note: The RMP shows track changes for consultation package 3A (Zonal Heating Value). They are shown in **green comment**. For the avoidance of doubt, they are not part of this consultation. Any feedback in relation to the drafting of those provisions should be communicated via the consultation package 3A.

The following is a summary of the proposed changes for each initiative.

3.1. Victorian Hydrogen integration (IN007/21).

Retail Market Procedures (Victoria)

- Clause 1.1.1 - Add the term “Gas” under the Part 19 meaning. This allows for the Part 19 definition of “gas” to be applied to the RMPs. As a result, any change to the definition of ‘gas’ in Part 19 when the AEMC recommended rules for extending the regulatory frameworks to hydrogen and renewable gases become effective will also change the definition for the purpose of the RMPs without further consultation. The word “gas” has been italicised in the remaining clauses of the RMP which links that term back to clause 1.1.1 (Definitions).
- Clause 1.1.1 – Delete the term “Market Participant” from the part 19 definition list and add the term “Market Participant” to the list of terms applicable to the RMPs. In addition, the meaning has been modified so that it excludes registerable capacities’ that aren’t applicable. The registerable capacity of Producer, Storage Provider and Trader don’t have any specific assigned retail market obligations within the scope of the RMPs.
- Clause 1.1.1 – Modify the term “custody transfer meter” so that this term has the same meaning as the term that applies to the Wholesale Market Metering Procedures.

- Note: Because the RMP changes for this initiative are being consulted on separate from the draft National Energy Laws Amendments (Other Gases) Bill 2022 and the AEMC's recommended Rules, should the NGR, recommended Rules and/or the associated DWGM Wholesale Market Metering Procedures changes not be made, AEMO may decide to still make the RMP changes described in this IIR.

3.2. Minor changes to the RMPs (IN007/23).

Retail Market Procedures (Victoria)

- Clause 1.1.A – Add a new clause called Application. This clause has been added to the RMP to harmonise with other jurisdictions such as NSW/ACT. The clause provides information in relation to what the Victorian retail gas market covers. It also informs about AEMO's guide that explains the scope of the DWGM and the VRGM.
- Clause 1.1.1 - Add the definition “market” under the Part 19 meaning. This resolves an existing error in the RMP. Adding this definition is required as the term “market” is used in the clause 4.1.1 (c).
- Clause 1.1.1 - Add the definition “installation database” under the Part 19 meaning so that it just refers to the existing definition in part 19 instead of linking that term to other regulatory instruments. Also deleted this definition from the list of terms that just only relate to the RMPs.
- Clause 1.1.1 – Add the definition “declared distribution system”. The definition references the Part 19 definition of the Rules. This is the same definition in the Wholesale Market Metering Procedures. A note is also included that links to the new clause 1.1.A (Application) which provides information about a guide that has further information on various distribution systems.
- Clause 1.1.1 – Modify the definition “Distribution Code” so that it refers to the correct title of the ESC code.
- Clause 1.1.1 – Modify the definition “Distributor” to include references to the newly added definition for “declared distribution system” and “Non-DTS distribution system”.
- Clause 1.1.1 – Add the definition “Non-DTS distribution system”. This definition has been added to improve the clarity within the RMPs and should be a point of difference in relation to obligation that may only apply to areas that are part of a declared distribution system or vice versa.
- Clause 1.1.1 – Modify the definition “Retailer” to include references to the newly added definition “declared distribution system” and “Non-DTS distribution system”.
- Clauses 1.1.1 (definition of second tier supply point), 2.1.4, 2.8.2 (b), 2.8.4 (b) and (c), (d), 2.9.7 – Modify these clauses so that they reference the definition “Non-DTS distribution system”.
- Attachment 6, clause 1.1. - Delete the words “Part C of schedule 1” as this section does not need to specifically reference the actual section of the Distribution Code.

Guideline to understand the scope of the Victorian DWGM and Retail Market.

- This is a new guideline. AEMO's view is to provide precise and unambiguous definitions of the declared transmission system (DTS), the declared distribution systems (DDS) are critical to understanding and defining the scope of the DWGM, the VRGM and AEMO's directions

powers. This guide should assist participants and other interested parties to understand the scope of these terms, as applied in each relevant section of the document.

4. Likely implementation requirements and effects

Section 4 of the DWGM Procedures for Hydrogen and DCF IIR, provide a detailed explanation of likely implementation requirements and effects in relation to the in terms of the DWGM in relation to AEMC's Hydrogen and DWGM Distribution Connected Facility rule changes. In a retail market context, for AEMO and participants the proposed changes represent documentation changes only. AEMO and participants will not be required to make any modifications to their existing Retail market systems or business processes.

In relation to the minor RMP change initiative for participants the proposed changes represent documentation changes only and participants will not be required to make any modifications to their existing systems or business processes.

5. Overall cost and benefits

In relation to Victorian Hydrogen initiative, as described in the DWGM Procedures for Hydrogen and DCF PPC, AEMO considers that the AEMC's [review into extending the regulatory frameworks to hydrogen and renewable gases](#) and the AEMC's [DWGM distribution connected facilities](#) rule changes provides the assessment of cost and benefits of the rule changes as required by the National Gas Objective (NGO).

As described in the DWGM Procedures for Hydrogen and DCF PPC, the Victorian Essential Service Commission's review of the Gas Distribution System Code of Practice, which requires administrative changes to the Wholesale Market Distribution UAFG Procedure to be consistent with the Code. AEMO considers these administrative changes are consistent with NGO.

In relation to the minor RMP change initiative, as these are only documentation changes AEMO does not expect there to be any participant costs as a result of these changes. In terms of benefits, it is envisaged that clearer, precise, and unambiguous procedures should reduce the overhead of spending time interpreting provisions within these procedures.

6. Magnitude of the changes

The initiative is part of the broad program related to accommodating Hydrogen as a renewable gas into regulatory framework and AEMO considers the magnitude of this change as material.

7. AEMO'S preliminary assessment of the proposal's compliance with Section 135EB

As part of the first-round consultation (PPC), AEMO put forward the following assessment regarding compliance with section 135EB of the National Gas Rules:

Requirement	AEMO's Preliminary Assessment
Consistency with National Gas Law (NGL) and NGR	<p>In relation to the Victorian hydrogen integration reform, AEMO's view is that the proposed procedure change is consistent with the NGL as required by the Energy Ministers and NGR as amended in the AEMC's rule changes.</p> <p>In relation to the minor RMP change initiative, these amendments provide clarity to participants and ensure defined terms within the RMP are accurately defined.</p>
National Gas Objective (NGO)	<p>In relation to the Victorian hydrogen integration reform, it is AEMO view's that the changes are expected to contribute to the achievement of the NGO by promoting efficient investment in the safe and efficient operation and use of covered gas services for the long term interests of consumers.</p> <p>In relation to the minor RMP change initiative, this change will provide a consistent set of documentation that ensures the efficient operation of the Victorian gas market for all market participants.</p>
Any applicable access arrangements	<p>In relation to the Victorian hydrogen integration reform, no Distributor raised concerns in relation to their Access Arrangement during AEMO's initial view consultation on potential changes that may be required to the procedures to facilitate hydrogen blends. On that basis it is AEMO's view that the proposed change is not in conflict with existing Access Arrangements.</p> <p>In relation to the minor RMP change initiative, as there are no system changes, it is AEMO's view that there are no negative impacts on applicable access arrangements.</p>

No participant submitted any opposing views in relation to AEMO's assessment during the first-round consultation. AEMO therefore maintains its original assessment as described above. In addition, in terms of the NGO, it is also AEMO's view that the changes are an enabler to achieve targets set by a participating jurisdiction for reducing Australia's greenhouse gas emissions; or that are likely to contribute to reducing Australia's greenhouse gas emissions.

8. Consultation forum outcomes

The PPC was issued on 15 September 2023 and submissions in response to it were due by COB 16 October 2023. Submissions were received from the following organisations, AGL, AGN, Energy Australia, Origin Energy and Red/Lumo. All supported the proposed changes.

Participant responses also identified typographic errors and other minor changes. AEMO has amended the text where appropriate.

AEMO identified further changes that add clarity to the "Guide to Understanding the scope of the Victorian DWGM and Retail Market" and has made those changes.

Impact & Implementation Report – Recommendation(s)

9. Should the proposed procedures be made?

AEMO recommends making the changes proposed in Attachments A and B³.

10. Proposed timelines

The AEMC's rule change requires AEMO to have published the Wholesale Market to take into account the amending rule by no later than 1 February 2024.⁴ The Procedure consultation process is as follows:

- IIR published: 30 October 2023
- IIR consultation submissions due: 28 November 2023
- Expected Decision published: 15 December 2023
- Effective Date of Procedures: 1 May 2024

³ The guide mentioned in attachment B is for information only and is not a document made under part 15B of the NGR and therefore the provision under 135EB to 135EG in the NGR do not apply.

⁴ AEMC Final Rules Report, 24 November 2022, pg. 148

Attachment A – Retail Market Procedure changes

Blue underline represents additions ~~Red~~ and strikethrough represents deletions – Marked up changes. Grey highlighted indicates changes made from PPC feedback.

The draft versions of the Retail Market Procedures showing tracked changes between the current version and the proposed changes is attached separately to this document.

Attachment B – Guide to understanding the scope of the Victorian DWGM and Retail Market.

Blue underline represents additions ~~Red~~ and ~~strikeout~~ represents deletions – Marked up changes.

The draft version of the Guide to understanding the scope of the Victorian DWGM and Retail Market attached separately to this document.

Attachment C – Package 3B IIR Retail Procedure Response Template.

The Package 3B IIR Retail procedure response template has been attached separately to this document. There are two sections in the template:

- Section 1 seeks general feedback on AEMO's examination of the proposal in sections 1–8 of this IIR.
- Section 2 seeks feedback on the proposed changes listed in attachment A and B

Anyone wanting to make a submission for this first consultation stage (Impact & Implementation Report (IIR)) are requested to use the response template provided in Attachment C. Submissions are due **COB 28 November 2023** and should be e-mailed to grcf@aemo.com.au.

Some RMP changes may overlap with Wholesale Market Procedure changes. Details about the Wholesale Market Procedure changes are described IIR – DWGM Procedure changes for Hydrogen and DCF. In relation to feedback on the proposed amendments to the Wholesale Market Procedure changes, please use the DWGM – IIR response template, which can be found [here](#).

Submissions are due **COB 28 November 2023** and should be emailed to GWCF_Correspondence@aemo.com.au.

ATTACHMENT D – Proposed Procedure Change (PPC) collated responses for IN007/21 and IN007/23

IN007/21 - Victorian Hydrogen integration includes DCF and AEMC Victorian hydrogen review changes. (Note: Includes IN017-22)

IN007/23 - Review Declared Distribution System definition

Section 1 - General Comments on the Proposed Procedure Change

Topic	Ref	Respondent	Participant Response	AEMO Response
Sections 1 to 9 of the PPC sets out details of the proposal.	1	Energy Australia	Energy Australia supports these changes, our wholesale and data teams agree that these changes support a framework to support the introduction of hydrogen.	AEMO notes Energy Australia's support of proposed procedure changes.
Does your organisation support AEMO's assessment of the proposal?	2	Origin	Origin Supports AEMO's assessment.	AEMO notes Origin's support of proposed procedure changes.
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.	3	Red Energy and Lumo Energy	Red Energy and Lumo Energy support the assessment of the proposal by AEMO, with minor amendments below.	AEMO notes Red Energy and Lumo Energy's support of proposed procedure changes.
	4	AGL	AGL considers AEMO's assessment of these specific changes to be reasonable.	AEMO notes AGL's comment of proposed procedure changes.
	5	AGN	AGN supports AEMO's assessment.	AEMO notes AGN's support of proposed procedure changes.

Section 2 - Feedback on the documentation changes in the Attachments A and B.

Attachment B in Retail Market PPC - Retail Market Procedures (Victoria).

Retail Market Procedures (Victoria)					
Ref #	Clause #	Respondent	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
6	1.1.1	Origin	Minor Editorial Change Remove the word 'means'	Custody Transfer Meter means for the purpose of this Procedure means the same as it means in section 1.4 (Definitions and interpretation) of the Wholesale Market Metering Procedures.	AEMO agrees with Origin and has made this change.
7	1.1.1	Origin	Minor Editorial Change Remove the word 'that'	Distributor (a) the service provider for the whole or any part of a declared distribution system; (b) the service provider for a Non-DTS distribution system pipeline in Victoria that ; and	AEMO agrees with Origin and has made this change.
8	1.1.1	AGL	Declared Distribution System See Note – DTS is not defined within the Retail Procedures, it is only an acronym. Suggest this be spelt out, or added to glossary for completeness.		AEMO notes AGL's comment. AEMO notes that the term DTS is used in the context of Non DTS and that it is already defined in National Gas Law (NGL).

9	1.1.1	AGL	Non-DTS See above – DTS is not defined within the glossary.		AEMO notes AGL’s comment refer to its response in ref #8.
10	1.1.1	AGL	Distributor See above – DTS not defined, but relied on for multiple terms in the glossary.		AEMO notes AGL’s comment refer to its response in ref #8.
11	1.1.1	AGL	Retailer See above Also – delete the word ‘that’ in (b) after Victoria		AEMO notes AGL’s comment refer to its response in ref #8. AEMO agrees with AGL’s suggestion about deleting ‘that’ and has made this change.
12	1.1.1	AGL	Second Tier See above – use of DTS		AEMO notes AGL’s comment refer to its response in ref #8.
13	2.1.4	AGL	Agree – again use of DTS		AEMO notes AGL’s comment refer to its response in ref #8.
14	Attachment 6	Origin	Minor Editorial Change 1..1 Remove the word ‘of’	in accordance with of the Distribution Code	AEMO agrees with Origin and has made this change.
15	ATTACHMENT 6 – NET SYSTEM PROFILE METHODOLOGY	Red Energy and Lumo Energy	The word ‘of’ should be removed from this sentence.	1.1. Calculation of the NSL ...in accordance with of the Distribution Code.	See AEMO response in Ref # 14

16	ATTACHMENT 6 1.1	AGN	Typo	<p>UAFGD is the relevant value assigned to:</p> <p>(a) the <i>Distributor</i> on whose distribution pipeline the <i>distribution supply point</i> is located; and</p> <p>(b) the quantity of <i>gas</i> withdrawn by a <i>Market Participant</i> at the <i>distribution supply point</i>,</p> <p>in accordance with of the <i>Distribution Code</i>.</p>	See AEMO response in Ref # 14
----	---------------------	-----	------	---	-------------------------------

Attachment B in Retail Market PPC - Guide to understanding the scope of the Victorian DWGM and Retail Markets.

Guide to understanding the scope of the Victorian DWGM and Retail Market					
Ref #	Section #	Respondent	Issue / Comment	Proposed text Red-strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
17	Purpose	AEMO	Minor Typographical update	<p>Purpose</p> <p>Precise and unambiguous definitions of the declared transmission system (DTS), <u>and</u> the declared distribution systems (DDS) are critical to understanding and defining the scope of the Declared Wholesale Gas Market (DWGM), the Victorian Retail Gas Market (VRGM) and AEMO's emergency and directions powers.</p>	AEMO has made these changes.

18	Whole document	AGL	<p>The use of the term Non-DTS distribution systems is used through the procedures,</p> <p>Suggest adding the relevant terms (in brackets) so that readers can relate the guide to the procedure</p>		<p>AEMO notes Part 19 informs the wording of the Guideline. The relevant definition in Part 19 is as follows:</p> <p>declared distribution system means a declared distribution system within the meaning of the NGL but does not include a distribution system, or part of a distribution system, that is:</p> <ul style="list-style-type: none"> (a) not connected directly or indirectly to a declared transmission system; or (b) indirectly connected to a declared transmission system but by means of a pipeline that does not form part of a declared transmission system.
19	Section 1	AEMO	<p>Minor Typographical update</p>	<p>1. Understanding the declared transmission system and declared distribution systems.</p> <p>The Victorian Retail Gas Market (VRGM) is the market which enables customers connected to distribution pipelines and systems in Victoria (including the non-DTS connected DDS) to buy gas from a licenced retailer of their choice. This market also allows large customer to directly participate in the market and the DWGM whereby they are responsible for sourcing their own gas, via commercial arrangements rather than buy the gas from a retailer. There are some distribution systems within the Victorian Retail Gas Market but that are not part of the DWGM. These are further explained in sections 4, 5 and 6 of this guide.</p> <p>AEMO has directions powers that apply to the DTS and the declared distribution systems (including the non-DTS connected DDS).</p>	<p>AEMO has made these changes.</p>

20	Section 2	AEMO	Rewording for clarity	<p>2. The Victorian declared transmission system (DTS).</p> <p>Such a Ministerial Order was made on 30 June 2009 which declared that the DTS is the transmission pipelines (including extensions or expansions treated as part of the pipeline under an applicable access arrangement) with respect to which, immediately before 1 July 2009, a service provider was APA GasNet Australia (Operations) Pty Ltd (ACN 083 009 278). APA GasNet Australia and is identified in AEMO's market systems as company id 14.</p> <p>The DTS is the transmission system owned by APA GasNet Australia and is defined in AEMO's market systems by the custody transfer meters detailed in the DWGM Custody Transfer Meter report.</p> <p>The DTS is defined by the custody transfer meters detailed in the DWGM Custody Transfer Meter Report, and is identified in AEMO Market systems as company id 14.</p>	AEMO has made these changes.
21	2	AGL	<p>Text is wrong. The DTS is not company 14, APA is. See last page for excerpt from Company register.</p> <p>Also, this sentence contradicts the first sentence. Recommend deleting it.</p>	<p>The DTS is defined by the custody transfer meters2 detailed in the DWGM Custody Transfer Meter report, and is identified in AEMO market systems as company id 14</p>	AEMO agrees with AGL and has updated Guide.
22	Section 3	AEMO	Rewording for clarity	<p>3. Declared Distribution Systems for the purpose of the Victorian DWGM (DDS).</p> <p>However, for the purpose of the DWGM, Part 19 of the NGR limits the distribution systems that form part of the DWGM to only those distribution systems that are directly connected to the DTS. This subset of declared distribution systems which forms part of the DWGM is referred to in AEMO's wholesale market procedures for the purposes of the DWGM as the DDS this note as the DDS.</p>	AEMO has made these changes.

23	3, 4	AGL	Tables 1-4 should be in an appendix at the back of the guide. They are not overly helpful to a reader.		AEMO does not agree with AGL's suggested change as the tables provide context to the content in section 3 and 4.
24	4.Declared distribution systems for the purpose of the Victorian retail gas market.	Red Energy and Lumo Energy	<p>(Paragraph 3)</p> <p>The description 'declared distribution systems that are not part of the DWGM' appears to contradict the description offered previously, referring to Clause 135AB (4) (b) (ii) (iii)</p> <p>"..a distribution pipeline in Victoria that does not form part of a declared distribution system..."</p> <p>If the gazetted declared distribution systems connect to the declared transmission system and form the DWGM, then the distribution systems not connected to the DWGM are not 'declared distribution systems'?</p> <p>e.g.</p> <p>(i) DDS,</p> <p>(ii) Non-DTS distribution systems; and</p> <p>(iii) Albury</p> <p>except for Mildura and environs</p>	The Victorian retail gas market therefore covers all distribution systems in Victoria (including declared distribution systems that are part of the DWGM, declared distribution systems that are not part of the DWGM and the Albury gas distribution system).	<p>The AEMO Guideline was developed to provide a simplified high-level overview of otherwise complicated VIC Order in Council (OIC). For further details, refer to ESC Stakeholder information session pack (session held Thursday 20 April 2023) which provides further clarification.</p> <p>https://www.esc.vic.gov.au/electricity-and-gas/codes-guidelines-and-policies/gas-distribution-system-code-practice/reviewing-gas-distribution-system-code-practice</p>

25	5	AGL	The map is more useful in describing where various system / services are.		AEMO notes AGL's comment.
26	5	AGL	Check text for declared distribution systems not part of Declared wholesale market. Are these now the Non-DTS distribution systems. Suggest aligning language with procedures.		AEMO notes AGL's comment. AEMO is awaiting internal stakeholder feedback and will make any changes at the time of AEMO's Decision on this consultation.
27	Section 7	AEMO	Rewording for clarity.	<p>7. Declared distribution systems for the purpose of AEMO's direction powers</p> <p>Under section 91BC of the NGL, AEMO may give written directions to a Registered participant (or an exempted participant) with respect to the DTS or a declared distribution system to maintain and improve the supply of natural gas, to maintain and improve the security of the DTS or a declared distribution system and in the interests of public safety.</p> <p>Under section 53 of the NGVA, AEMO must make the Gas Emergency Protocol, which is comprised of the following documents:</p> <ul style="list-style-type: none"> a) Emergency Procedures (Gas); b) Gas Load Curtailment and Gas Rationing and Recovery Guidelines; and c) Gas Curtailment List (published on AEMO's Market Information Bulletin Board (MIBB)). <p>In relation to:</p> <ul style="list-style-type: none"> • AEMO's power of direction, the references to a declared distribution system refers to those distribution pipelines that were specified in the Ministerial Order made pursuant to section 39 (1) (a) of the NGVA on 30 June 2009 (see Table 1 above). • AEMO's Gas Emergency Protocol, the references to a declared distribution system refers to those distribution pipelines that were specified in the Ministerial Order made pursuant to section 39 (1) (a) of the NGVA on 30 June 2009 (see Table 1 above) 	AEMO has made these changes.

				<p>As a result, AEMO's powers of direction under the NGL include the power to make directions with respect to the safety, security or reliability of the DTS and both distribution systems that are directly connected to the DTS and distribution systems that are not directly connected to the DTS. Similarly, the scope of AEMO's Gas Emergency Protocol covers both distribution systems that are directly connected to the DTS and distribution systems that are not directly connected to the DTS.</p>	
--	--	--	--	---	--