



Response template for the East Coast Gas System Guidelines Consultation

Email responses to: gasreform@aemo.com.au

Review comments submitted by: *APA*

Confidential: **NO**

Date: *16-May2023*

Contact Person: *Kate Lucas*

Please complete sections 1 and 2.

Section 1 - General Comments on the Guidelines

Topic	Please Provide Response Here
East Coast Gas System Guideline (general comments)	
3.4 Invitation to a conference <i>(e) In such circumstances, AEMO will request entities to confirm receipt of the conference notice. AEMO will also use best endeavors to ensure the conference notice has been received by the relevant entity.</i>	For the conference to be held at short notice or outside of business hours, APA suggests the SMS notification as a primary method, and an email as a secondary. Can AEMO clarify whether such notification will be sent to all participants' representatives registered under Part 27, or a separate 'emergency contact group'? The current draft of the guidelines doesn't include any commentary for the situation when the participant hasn't confirmed the receipt of the notice. Will there be any penalties imposed on the participant that failed to confirm the receipt?

<p>3.5 Discussion at a conference</p> <p><i>(h) Market sensitive information must not be disclosed at a conference.</i></p> <p><i>(i) A participant at a conference can indicate information that is market sensitive or confidential and AEMO must may engage directly with the participant outside of the conference where AEMO deems it necessary to obtain further information.</i></p>	<p>AEMO should be issuing the Market Information Notice (MIN) and/or a specific Facility Operator direction before requesting any confidential information disclosure from APA. In the absence of the MIN or specific direction, APA cannot provide any information that is classified as confidential.</p>
<p>4.4 Principles AEMO may consider when giving directions</p> <p><i>'AEMO will repeat the steps in Figure 2 where there is a requirement to give related directions to achieve the intended outcome of a direction, including:</i></p> <ul style="list-style-type: none"> <i>• issuing directions to both the facility operator and BB shippers to ensure their activities are aligned;</i> 	<p>(1) APA appreciates AEMO acknowledging and incorporating our earlier feedback around the recognition of the holder of the title to gas (Shipper) and the contract carriage consideration required for any direction to change the gas nomination, including new and existing nominations.</p> <p>APA would like to see the simultaneous release of the direction to the Shipper and Facility Operator reflected in Directions process diagram. The current flow of the diagram doesn't explicitly reflect the contract carriage approach.</p> <p>(2) From the steps described by AEMO that are to be followed prior to issuing the direction, we understand the facility operator may be given a direction <i>'to increase or decrease the flow of gas, or to specify what changes to current nominations can be accepted, i.e., to ensure subsequent directions are not impacted'</i>.</p> <p>As indicated in point (1), Facility Operator cannot, in isolation from the Shipper and/or Producer, receive a direction that involves the gas nomination manipulation.</p> <p>For the direction to Facility Operator to accept (or not) the incoming nominations, APA's ability to accept or reject the new nominations outside of the current gas day is extremely limited. APA notes the AEMO concern that the intended direction might be impacted by incoming nominations in the interim period (before the direction issue), including a change of the physical flow direction to the affected location. To preserve particular flow direction, APA strongly recommends AEMO releases the direction to the market participants that communicates the impacted location and requests specific nomination behavior instead of directing a Facility Operator only.</p>

Section 2 - Feedback on the documentation changes in the Guidelines

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

East Coast Gas System Guidelines

Procedure Clause #	Issue / Comment	Proposed text Red strik means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)