



Response template for the East Coast Gas System Procedures Consultation

Email responses to: gasreform@aemo.com.au;

Review comments submitted by: *Jemena*

Confidential: NO

Date: *28 April 2023*

Contact Person: *James Harding, Gas Markets Regulation Manager*

Please complete sections 1, 2 and 3 below.

Section 1 - General Comments on the Procedure changes

Topic	Please Provide Response Here
East Coast Gas System Procedures	<p>We note AEMO's commentary in the Frequently Asked Questions document version 1 published on 13 April 2023 which stated that 'Gas flows subject to an AEMO direction are classified as a higher priority than firm priority.'</p> <p>Although we understand that AEMO may intend that pipeline operators prioritise flows which are subject to an AEMO direction, based on our review of the consultation draft NGL and NGR amendments, we believe that it would be necessary for a direction issued by AEMO to expressly instruct a pipeline operator to prioritise particular gas flows in order to give effect to this intent. Without such an express instruction, a pipeline operator may not necessarily be able to give priority in all circumstances to AEMO directed flows above all other firm flows.</p>
BB Procedures	

BB Data Submission Guide

We note the proposed approach of incorporating the extended daily capacity outlook into MTCO submissions, which will require the MTCO submission for a facility to include additional "events" to cover gas days where no maintenance is being undertaken (i.e. the normal nameplate capacity rating applies) within the 6 month outlook period.

Although we acknowledge the NGR will require BB reporting entities to include data in the RecallTime and RecallDescription fields where an MTCO event relates to facility maintenance, these fields are not applicable to gas days where no maintenance is being undertaken. From a data submission perspective, the fields RecallTime and RecallDescription should therefore not be mandatory for MTCO submissions, allowing reporting entities to leave these fields blank where no maintenance which impacts capacity is being undertaken.

Section 2 – Specific AEMO questions

Topic	Please Provide Response Here
AEMO seeks feedback from stakeholders as to whether there is a preference for using the existing Medium Term Capacity Outlook or Short Term Capacity Outlook or the extended daily capacity outlook as discussed in section 4 of the PPC.	

Section 3 - Feedback on the documentation changes in the Procedures

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

East Coast Gas System Procedures

Procedure Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
2.2.3	To improve clarity and participant understanding of the submission requirements relating to the extended daily capacity outlook, we suggest that the outlook period referred to in clause 2.2.3(a) be modified to align with the weekly submission requirement by specifying a period of 26 weeks, rather than 6 months.	(a) Where a BB reporting entity for a BB facility is required under Part 27 of the NGR to provide to AEMO a daily capacity forecast for a 6-month outlook period (extended daily capacity outlook), the BB reporting entity must provide the forecast by 7.00 pm on each Monday of month M-1 for months M to M+5 <u>week W-1 for weeks W to W+25</u> .	
2.2.5	<p>As previously outlined to AEMO, the calculation of red, amber and green linepack bounds by Jemena will be a manual process involving pipeline modelling. We understand that the intent behind the requirement to provide red, amber and green linepack bounds is that these are not expected to be recalculated in response to short term (i.e. day-to-day) changes in conditions on a pipeline, for example during a period of planned pipeline maintenance.</p> <p>The data update requirements applicable to the submission of red, amber and green linepack boundaries should be modified to reflect this intent, and should expressly clarify that a BB reporting entity need only provide updates to previously submitted linepack boundary values where the BB reporting entity expects the changed value to apply for a period of at least three months.</p>	<p>(f) If there has been a change to any of the values submitted in accordance with clause 2.2.5(c) corresponding to clause 2.1.5(a)(ii), (a)(iii), (a)(iv) or (a)(v), updated information must be provided as soon as practicable where that change exceeds the greater of A and B where:</p> <p>(i) A is 5 TJ/day; and</p> <p>(ii) B is the lesser of 10% of the previously submitted corresponding value and 30 TJ/day.</p> <p><u>(g) If there has been a change to any of the values submitted in accordance with clause 2.2.5(c) corresponding to clause 2.1.5(a)(iii), (a)(iv) or (a)(v), updated information must be provided as soon as practicable where the BB reporting entity expects that changed value to apply for a period of at least 3 months and that change exceeds the greater of A and B where:</u></p> <p><u>(i) A is 5 TJ/day; and</u></p>	

(ii) B is the lesser of 10% of the previously submitted corresponding value and 30 TJ/day.

East Coast Gas System Guidelines

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