



Response template for the East Coast Gas System (ECGS) Procedures Consultation

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

Review comments submitted by: Origin Energy

Confidential: No

Date: 14 March 2023

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Comments on the ECGS Procedure changes

Topic	Please Provide Response Here
Information Provision Obligations – Retailers and Large User Facilities – Expected daily gas demand (Section 2.2.1)	<p>Retailers and BB Large User Facilities (including gas powered generators (GPG)) will be required to provide estimates of the expected daily gas demand that is to be purchased under gas supply agreements and from exchanges and facilitated markets.</p> <p>It may be challenging to provide meaningful estimates up to six days ahead as purchases for retail and GPG may be influenced by realised gas prices in operational timeframes. For example, in a few days' time a participant may expect to have a short position that could be filled by purchasing gas from a spot market, or drawing on storage / park services. The option used to solve the position will depend on market and transportation prices at the time. Further, real-time pricing dynamics in the national electricity market (NEM) will also impact the level of expected gas demand for GPG and by extension, purchases, adding to the uncertainty around any estimates.</p> <p>We would also like to highlight that Origin takes an aggregated portfolio approach to managing our GPG and retail load. For the purposes of the new reporting which splits out Large User Facility (i.e. GPG) and Retailer expected demand, it is not clear how we would allocate / apportion purchases of gas to each segment.</p>

<p>Information Provision Obligations – BB Large Users – Medium term maintenance demand (Section 2.2.2)</p>	<p>We note that BB Large User facilities will be required to provide details of maintenance work (for the next 24 months). Based on the ECGS procedures, it appears this maintenance information would need to be provided by GPG. We do not believe this obligation should apply to GPG as this would result in a duplication of reporting given generators already submit their availability to AEMO via the MT PASA process.</p> <p>If GPG is captured by the new maintenance reporting obligations, further clarity is required regarding how maintenance on interconnected facilities should be reported. For example, if a generator is connected to a single pipeline which has its own separate maintenance schedule, and this pipeline maintenance has an impact on the generator – how would AEMO expect this to be reported?</p>
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