
STTM REPORT – Delayed Facility Hub Capacity Quantity Submission

March 2020

Reporting on validation and substitution of data

Prepared by Gas Market Monitoring

Important notice

PURPOSE

AEMO has prepared this report pursuant to Section 7.6 of the STTM Procedures, and Version 52 of the National Gas Rules, unless otherwise specified.

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Summary

AEMO is required to report that there have been two separate late submissions of facility hub capacity values in the Short Term Trading Market (STTM). On 9 February 2020 AGL Upstream Investments Pty Limited (AGL) submitted late into the Sydney hub for Newcastle Gas Storage Facility (NGS) and Rosalind Park Production Facility (ROS), and on 13 February 2020 Epic Energy South Australia Pty Ltd (Epic) submitted late into the Adelaide hub for Moomba to Adelaide Pipeline (MAP).

The National Gas Rules (NGR) 414 specify *"no later than 3 hours after the start of each gas day, an STTM facility operator must notify AEMO of the quantity of natural gas which it expects, in accordance with good gas industry practice, that the STTM facility will be able to deliver to the relevant hub..."*. If a submission has not been received within 3 hours after the start of the gas day the submission window is extended for a maximum of one-and-a-half hours or until a valid submission is received or a submission is confirmed.

In both cases the information was provided after the 3-hour cut-off but within the extended window.

This report is published in accordance with section 7.6 of the STTM Procedures and covers both late submissions. All times used in this report are AEST.

9 February submission delay (AGL)

On 9 February, AGL failed to submit the facility hub capacity for NGS and ROS for gas day 10 February in the Sydney hub by 9.00 am.

The submission window was extended to 10.30 am and AGL proceeded to submit facility hub capacity within the extended period.

13 February submission delay (Epic)

On 13 February, Epic failed to submit the facility hub capacity for MAP for gas day 14 February in the Adelaide hub by 9.00 am.

The submission window was extended to 10.30 am and Epic proceeded to submit facility hub capacity within the extended period.

Assessment of submission delay on STTM

AGL

At 9.17 am and 9.21 am on 9 February 2020, AGL submitted facility hub capacity values for the D-1 schedule for the NGS and ROS facilities at the Sydney hub. Pursuant to Rule 414 of the NGR, AGL failed to notify AEMO of facility hub capacity for the following day within the specified time frame.

AGL explained that an application upgrade impacted the connectivity between their local data centre and the cloud-based data environment, requiring a manual submission. The duty trader experienced issues when manually submitting the data.

At 9.03 AEMO issued two Facility Hub Capacity Quantity Submission Notices to notify that D-1 schedule for gas day 10 February had not been received for the NGS and ROS facilities. AGL did not submit a complete set of STTM facility hub capacity by 9.00 am, consequently the submission window was extended to 10.30 am pursuant to NGR 414 (2A), i.e. substituted information.

AGL submitted STTM facility capacities well before 10.30 am, thus no further action was required of AGL.

AGL is investigating the cause of the loss of connectivity between their data centre and the cloud. In addition, AGL intends to trigger their warning alarm earlier to allow more time for traders to submit data in addition to providing refresher training to traders.

Epic

At 8.47 am (and again at 8.55 am) on 13 February Epic submitted the relevant files for the D-1 schedule for the MAP at Adelaide hub however the facility hub capacity files were rejected due to incorrect naming conventions. Pursuant to Rule 414 of the NGR, Epic failed to notify AEMO of facility capacity for the following day within the specified time frame. AEMO issued a Facility Hub Capacity Quantity Submission Notice to notify that D-1 schedule for gas day 13 February had not been received for the MAPS facility at 9.03am.

Epic did not submit a complete set of STTM facility hub capacities by 9.00 am, reporting that an error occurred in the automatic process of refreshing passwords, requiring the manual reset of passwords and manual submission of data. Epic resubmitted the relevant files at 9.12 am which successfully passed validation.

Market impact and AEMO's actions

The NGR requires facility operators to submit facility hub capacities to AEMO by 9.00 am for D-1 capacity.

On both occasions the D-1 capacity was not received by the initial cut-off time of 9.00 am, however they were received before the extended cut-off time of 10.30 am.

The two events of delayed information submission by AGL and Epic did not impact the operation of the STTM. AEMO processes and procedures fully operated as intended under the rules, without material impact on market outcomes.

Discussion

Mechanisms are in place to mitigate the market impact in the event of a late, or invalid, data submission. If a submission has not been received within 3 hours after the start of the gas day the submission window is extended for a maximum of one-and-a-half hours to allow the facility operator to submit substitute data. As per the STTM Procedures, if valid capacity information is not provided within this extended period, AEMO must use:

- if available, the capacity information provided on the gas day that is 2 gas days before the gas day to which the information relates; otherwise
- if available, the capacity information provided on the gas day that is 3 gas days before the gas day to which the information relates; otherwise
- the registered capacity of the facility.

Section 7.6 of the STTM Procedure requires AEMO to prepare a report when such data is not provided or fails validation. This requirement to prepare a report appears to be an unnecessary administrative burden on AEMO as there is a process for substituting information. AEMO proposes to address the level of reporting that Participants would expect, as required by the Procedures, at a future Gas Wholesale Consultative Forum.

A1. Chronology

9 February Event

Time	Event / Action
9.17 am	AGL submit files for NGS that pass validation.
9.21 am	AGL submit files for ROS that pass validation.
10.30 am	--Cut Off--

13 February Event

Time	Event / Action
8.47 am	Epic submit files for MAP that do not pass validation.
8.55 am	Epic resubmit files for MAP that do not pass validation.
9.12 am	Epic resubmit files for MAP that pass validation.
10.30 am	--Cut Off--