

A few
words.



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Yvonne Tan
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Lodged by email: gbb_redevelopment@aemo.com.au

Dear Ms Tam

Impact and Implementation Report – Gas Bulletin Board Procedures

AGL Energy Ltd (AGL) welcomes the opportunity to comment on the changes to AEMO's East Coast Gas Bulletin Board (the Bulletin Board) Procedures.

AGL is one of Australia's leading integrated energy companies, operating a retail business with over 3.7 million gas and electricity customers. It is also a participant in the East Coast Gas Markets and views the Bulletin Board as key source of market information.

In summary, the proposed changes to the Bulletin Board procedures are to reflect the changes made to Chapter 18 of the National Gas Rules. Those changes were made to improve information transparency of the Bulletin Board in order to provide stakeholders with a better understanding of gas market supply and demand conditions.

AGL is generally supportive of the additional reporting requirements and how the detail has been dealt with in the changes to the Bulletin Board Procedures. However, it has a few concerns that it wishes to raise.

Firstly, it is concerned with the daily reporting of actual storage levels that is required of gas storage facilities. This is because this type of information may be commercially sensitive, especially in the case of storage facilities that are wholly owned and utilised by one entity.

Furthermore, the proposed changes may not result in greater transparency and efficiency in the gas market as information that is published on the Bulletin Board is still not easily accessible. For example, it is difficult to quickly find information about pipeline outages as they are published in separate PDF documents, which also makes it difficult to create tools to search for this information.

AGL considers that the changes to the reporting requirements would be more beneficial to the market if the information was published in a standardised way—similar to the Projected Assessment of System Adequacy (PASA) in the wholesale electricity market, and for it to be presented in a manner that enables participants to use it i.e. to create alert systems. We would be happy to discuss in further detail suggested improvements to the way information is published on the Bulletin Board.



Finally, as we have noted in our submission to the East Coast Gas Market Review, we also support the introduction of a reporting standard that is based on the 'good gas industry practice' standard that applies in the STTM, which would include for example an obligation for parties to undertake reasonable endeavours to honour information that it posts on the Bulletin Board. However, AGL notes that these measures must be balanced against the costs of introducing them.

In conclusion, we are generally supportive of the changes to the Bulletin Board procedures, but consider that there needs to be changes to the formatting of the Bulletin Board itself to ensure that objectives of greater information transparency and better efficiency in the gas market is achieved.

If you have any queries about the submission or require further information, please contact Josynta Singh at or on 03 8633 6628.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simon Camroux', written in a cursive style.

Simon Camroux
Manager Wholesale Markets Regulation
AGL Energy Ltd