

## NOTICE OF DETERMINATION

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Notice to all Registered Participants (Participants) under the National Gas Rules (NGR).

This notice advises all Participants and other interested stakeholders on AEMO's decision to amend the BB Data submission procedures in accordance with Rule 135EE of the NGR.

AEMO notifies Participants that version 4.0 of the BB Data Submission Procedures will be effective from 16 March 2020.

Consultation on changes to the BB Data Submission Procedures, prescribed in rule 135EE, concluded on 20 January 2020.

The decision to change the Procedures considers the assessment provided in the Impact and Implementation Report (IIR) IIR for the BB Data Submission Procedures arising from the merging of the BB Data Submission Procedures version 3.0 with the Guide to Gas Bulletin Board Data Submissions version 2.1.

Updates to the new version include

- merging of the BB Data Submission Procedures version 3.0
- changes to incorporate the commencement of the Pipeline Capacity Trading market
- changes to make expectations for the Short Term and Medium Term Capacity Outlook clearer and more meaningful, the free text description has been updated. It now includes prompts to name the facility, the location of transport routes affected and the reason for the changes to the capacity outlook.
- changes to the reporting of pipeline uncontracted capacity from the next 12 months to the next 36 months. Refer to the National Gas Rules (NGR) version 46 which came into effect on 21 June 2019 as a result of a review into the regulation of covered pipelines.
- Additional validations on the Daily Production Flow submissions

AEMO has attached a table of submissions and responses to the IIR. The changes made in the Procedures are amended as per the response in the attached table.

AEMO is required to write and maintain the procedures relating to the BB under NGR Part 15B. The changes to the BB Data Submission Procedure are consistent with the NGR and the National Gas Objective.

The IIR is available on the AEMO website at: [https://aemo.com.au/-/media/files/stakeholder\\_consultation/consultations/gas\\_consultations/2019/gbb/iir-bb-data-submission-procedure.pdf?la=en](https://aemo.com.au/-/media/files/stakeholder_consultation/consultations/gas_consultations/2019/gbb/iir-bb-data-submission-procedure.pdf?la=en)

Notice Date: 24 February 2020

Responses to submissions/comments:

No.	Participant	Submission	Response
1	Jemena	<p>I've noticed that pages 75 – 89 of <i>BB DATA SUBMISSION PROCEDURES VERSION 4.0.pdf</i> document have been crossed out.</p> <p>This is the section pertaining to requesting AEMO assistance via the support hub amongst a number of other things such as IT assistance</p>	<p>AEMO's support hub remains available for all participants.</p> <p>The idea behind removing this section in the Procedure is that if it changes it requires a consultation to update/change. As contact information could change, we prefer it to be on our website. You can find all our contact details at <a href="http://www.aemo.com.au">www.aemo.com.au</a>. We expect participants to be able to contact us for any of the queries you outline below.</p> <p>Apologies for the formatting – it seems to have created many pages when it was printed as a PDF.</p>
2	Jemena	<p><b>Re: <u>Page 14: Short Term Capacity Outlook</u> -</b> we would like some further clarification re comment highlighted in yellow below.</p> <p>Currently we provide the outage type information for each of the gas day (if applicable).</p> <p>Going forward, would AEMO prefer to see the description information (for any transport routes affected - if applicable), similar to the layout of Medium Term Capacity outlook - showing "From date" and "To date" so that each event can be summarised in one line? If so, does this mean that Short Term Capacity Outlook would have a "From date" and "To date" as well?</p>	<p>For Short Term Capacity Outlook (p14) "Description":</p> <p>Where this is expected to affect multiple days for the same reason, each event is to be summarised as one line, rather than multiple entries across multiple days <i>change to</i></p> <p><b>Where the capacity outlook affects multiple days for the same reason, these events are to be summarised as one line, with the summary applied across the impacted days.</b></p> <p>For Medium Term Capacity Outlook (p24) "Description":</p> <p>Where this is expected to affect multiple days for the same reason, each event is to be summarised as one line, rather than multiple entries across multiple days <i>change to</i></p> <p><b>Where the capacity outlook affects multiple days for the same reason, these events are to be summarised as one line, with the summary applied across the impacted days</b></p>

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3	Origin	<p><b>Short Term Capacity Outlook – updated data field Description (pg. 14):</b> Origin’s preference is for the same summary description to be applied across multiple maintenance days, which is consistent with our current process. Given maintenance timeframes can vary at short notice, we are concerned the use of one description line with a specified date range (as proposed) would likely be more difficult to track.</p>	See answer to 2. above
4	Origin	<p><b>Nominations and forecasts:</b> The note provided on pg. 29 outlines that “<i>Submissions may contain data for the current gas day, which are intra-day changes to nominations and forecasts. Intra-day submissions are accepted four hours after the close of gas day D until midday on the gas day after (D+1).</i>” We would just like to clarify whether draft Procedure has accounted for Gas Day Harmonisation, noting four hours after the gas day is 10AM, though the document suggests a midday cut-off (six hours after the end of the gas day).</p>	<p>New wording:</p> <p><b>Intra-day submissions for the current gas day (D) will be accepted up to the end of gas day.</b></p>
5	Energy Australia	<p>The BB Data Submission Procedure Version 4 page 38 section A14 Uploading a file using MarketNet refers to AEMO Guide to Information Systems. However AEMO Guide to Information Systems does not provide a guide to how to submit data using CSV.</p>	<p>AEMO will be updating the Guide to Information Systems in the current project Gas Transparency Measures, due to be completed by the end of 2020.</p>

No.	Participant	Submission	Response
		Will AEMO be updating the AEMO Guide to Information Systems?	
6	APA	<p><b><u>Short term Capacity Outlook:</u></b></p> <ul style="list-style-type: none"> <li>Description field: Requires text to describe the reasons or provide comments directly related to the quantity and the times, dates, or duration of which those quantities are expected to apply. This is a mandatory field so facility operators have to provide something. It appears that this field is targeting information about maintenance activities, however as the Short Term Capacity outlook is a daily report of capacities, and facilities are not always affected by maintenance, what is required to be included in this field for capacities that are not impacted by maintenance?</li> <li>The Description field also requires that where maintenance affects multiple days, for the same reason, it is to be summarised as one line, however the short term capacity outlook requires facility operators to provide on each gas day our good faith estimate of the daily capacity of the BB facility for gas days D+1 to D+7. How can we then summarise maintenance affecting multiple days for the same reason as one line? It appears the two requirements contradict each other.</li> </ul>	<ul style="list-style-type: none"> <li>Description Field is a free text field. The suggestions in the Procedure are a best fit, however participants can put any reason into the field to explain the change to the capacities.</li> <li>Agree. See answer to 2. above</li> </ul>
7	APA	<b><u>Daily Production Flow</u></b>	AEMO will include a clarification and a worked example for the validation on flow submissions in the <b>FAQs on the Gas Bulletin Board</b> .

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		<ul style="list-style-type: none"> <li>Connection point Actual quantity is to be validated against the connection point nameplate rating. What will happen if the validation fails? i.e. what will AEMO do if daily flow reported is greater than the nameplate rating of a particular connection point?</li> </ul>	<p><i>For GBB FAQs:</i></p> <p><b>Q. What will happen if daily flow reported is greater than the nameplate rating of a particular connection point and the validation fails?</b></p> <p>A. The parameters configurable by AEMO for validation are:</p> <p>A soft warning (yellow message) will appear when submitting higher than capacity or 1.3x the capacity, and the submission will be allowed to pass.</p> <p>A hard warning (red message) will appear when submitting 2x capacity, and the submission will be rejected.</p> <p>The different facility types are validated according to the following logic</p> <ul style="list-style-type: none"> <li>Pipelines: validations will be on the individual connection point capacities and flows. The source of capacity information to compare will be from Connection Point Nameplate Rating</li> <li>Production and Compression facilities: validations will be the MDQ capacity against flows. The source of the capacity information to compare will be from Short Term Capacity Outlook using type MDQ</li> <li>Storage Facilities: Validations will be against the MDQ capacity for Receipt and Delivery and Storage capacity for the held in storage volume. The source of the capacity information to compare will be from Short Term Capacity Outlook for MDQ as well as Storage Capacity</li> </ul>
8	APA	<b><u>Medium term Capacity Outlook</u></b>	Agree. See answer to 2. above

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		<ul style="list-style-type: none"> <li>Have AEMO considered performing the aggregation of daily grain information rather than Facility Operators aggregating it into one line? APA report on a daily grain in order to capture situations where multiple capacity impacting works occur on the same day. In such situations, we provide the lowest of the two capacity impacts. As you will undoubtedly understand, maintenance activities do not necessarily all run for the same duration, hence the need to report on a daily grain.</li> </ul>	
9	APA	<ul style="list-style-type: none"> <li>Effective date for these changes is to be 2nd March 2020. This is an extremely short lead time. Is there any scope to extend the lead time for these changes?</li> </ul>	The implementation date for this procedure will be 16 March 2020 to allow any testing to occur, and the change process to be completed.
10	SEAGAS	<ul style="list-style-type: none"> <li>4.1.1 STCO description now mandatory. We don't agree with this change, as we think this is unnecessary, and would become a burden for us.               <ul style="list-style-type: none"> <li>Our figure is autogenerated by the system when our pipeline capacity is determined. Under normal conditions it will vary day by day, as our capacity is modified based on pipeline conditions (linepack, temperature etc), When compressor outages causing larger changes to capacity occur, this information has already been notified through MTCO.</li> </ul> </li> </ul>	AEMO has made the description of STCO mandatory to be consistent with the requirements of the MTCO. This is to clarify the reason behind changes in capacity outlooks.

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		<ul style="list-style-type: none"> <li>○ We think it only makes sense to enforce a description for the MTCO value, as this doesn't fluctuate to the same extent as STCO. If a capacity change occurred due to an unexpected outage, then this is when the description field would be used in STCO submission.</li> <li>• A3.1.2 provides an example without a description, however description is defined as mandatory in 4.1.1</li> </ul>	<p>Agree. Example descriptions have been added for STCO.</p>
11	SEAGAS	<ul style="list-style-type: none"> <li>• Your examples in A3 for the csv file contain text that includes commas, I suspect this would fail a submission as the text isn't enclosed in quotes</li> </ul>	<p>Good pick up. These have been amended to include double quotation marks.</p>
12	SEAGAS	<ul style="list-style-type: none"> <li>• 4.2.3 DPF file validation describes Facility Actual Quantity but it isn't clear what this value relates to, as the file contains Actual Quantities for connection points not facilities. Further clarification is required to differentiate how this validation applies differently to Connection point Actual Quantity described in the dot point above on p18</li> </ul>	<p>Agree. See answer to question 7 above and visit <b>FAQs on the Gas Bulletin Board</b>.</p>