



Response template for the East Coast Gas System Guidelines Consultation

Email responses to: gas.reform@aemo.com.au

Review comments submitted by: *Jemena*

Confidential: NO

Date: 6 April 2023

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Please complete sections 1 and 2.

Section 1 - General Comments on the Guidelines

Topic	Please Provide Response Here
East Coast Gas System Guideline (general comments)	Please refer to our comment below regarding section 4.4 of the Guideline.

Section 2 - Feedback on the documentation changes in the Guidelines

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

East Coast Gas System Guidelines

Procedure Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
4.4	<p>The Guideline notes that the NGR limits AEMO's ability to give a direction in relation to gas which is required to meet obligations under certain long term LNG export contracts.</p> <p>We acknowledge that AEMO may not necessarily be aware of whether gas it intends to direct may be subject to this exclusion under the NGR. The same is true for other relevant entities which may be issued a direction—such as pipeline operators, which transport gas owned by a third party and which may or may not ultimately be used to meet a third party's obligation under certain long term LNG export contracts.</p> <p>Pipeline operators would not be in a position to comply with a requirement in an AEMO direction to notify AEMO if they consider that the natural gas which might otherwise be subject to the direction falls within the exclusion. Only the owner of the gas is likely to be able to properly assess whether the gas may fall within the exclusion.</p> <p>We therefore suggest that the wording in a direction as proposed on pp.14-15 of the Guideline be amended to clarify that the directed relevant entity only needs to notify AEMO that the gas is subject to the exclusion where that relevant entity is the owner of the gas.</p>		