



## Response template for the East Coast Gas System Procedures Consultation

Email responses to: [gasreform@aemo.com.au](mailto:gasreform@aemo.com.au):

Review comments submitted by: Red Energy and Lumo Energy

Confidential: No

Date: 14 March 2023

Contact Person: Sean Jennings

Please complete sections 1, 2 and 3 below.

### Section 1 – General Comments on the Procedure changes

Topic	Please Provide Response Here
East Coast Gas System Procedures	<p>Red Energy and Lumo Energy (Red and Lumo) acknowledge the limited time available prior to winter 2023 which necessitates the consultation on procedures prior to acceptance of the National Gas (South Australia) (East Coast Gas System) Amendment Bill 2022 (Amendment Bill). However, we note the absence of any reference in the proposed procedures of the potential for revision or removal in the event that the bill is not passed in its current form.</p> <p>We recommend that AEMO provide clarification on elements of the reporting requirements (detailed below) to provide clear guidance to relevant entities and propose a minor amendment of the ECGS procedures to align with the proposed Rules and the BB Data Submission Guide.</p>
BB Procedures	
BB Data Submission Guide	<p>Red and Lumo have some observations regarding the description for Identifiers for Demand Zones and seek clarification on elements of the reporting requirements (detailed below) to provide clear guidance to relevant entities.</p>

**Section 2 – Specific AEMO questions**

<b>Topic</b>	<b>Please Provide Response Here</b>
AEMO seeks feedback from stakeholders as to whether there is a preference for using the existing Medium Term Capacity Outlook or Short Term Capacity Outlook or the extended daily capacity outlook as discussed in section 4 of the PPC.	

### Section 3 - Feedback on the documentation changes in the Procedures

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

East Coast Gas System Procedures			
Procedure Clause #	Issue / Comment	Proposed text <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
2.1.2. Exemptions and default and standing values	Red and Lumo seek clarification from AEMO on the requirement for a Part 27 retailer to provide expected daily gas demand if the Part 27 retailer has no customers and no demand across the East Coast Gas System.  Will retailers be able to apply for an exemption under clause 2.1.2 or will they be required to submit (null) data?	Part 27 provides that AEMO may make Procedures to exempt a relevant entity from the obligation to provide an item of Part 27 information and to provide for the use of default or standing values in place of the exempt information.	
2.2.1. Expected daily gas demand	Red and Lumo seek clarification from AEMO on the requirement for a Part 27 retailer to provide expected daily gas demand if the Part 27 retailer has no customers and no demand across the East Coast Gas System.  Will the Part 27 retailer be required to submit a null report by 10.00 pm each gas day D-1 for gas days D to D+6 for all demand zones?	(d) A relevant entity that is a Part 27 retailer must provide, for each demand zone:  (i) the proportion of the expected daily gas demand that is to be purchased under a gas supply agreement based on the relevant entity's reasonable expectation of existing and potential agreements;  (ii) the proportion of the expected daily gas demand that is expected to be purchased from a gas trading exchange, including the Trading Location, administered by AEMO (including a gas trading exchange location outside of the demand zone);  (iii) the proportion of the expected daily gas demand that is expected to be purchased from a market administered by AEMO, where that market is wholly or partly within the demand zone;  (iv) the proportion, of the expected daily gas demand that is expected to be purchased from a market administered by AEMO, where that market is outside of the demand zone; and	

		(v) the total expected daily gas demand for that demand zone which must equal the sum of the values submitted under clauses 2.2.1(d)(i), (d)(ii), (d)(iii) and (d)(iv).	
2.2.1. Expected daily gas demand	Red and Lumo recommend the ECGS Procedures be amended for consistency with (proposed) NGR 685 and the BB Data Submission Guide.	(b) The expected daily gas demand and the proportions referred to in clause <a href="#">2.2.1(d) and</a> 2.2.1(e) must be in TJ/day.	
Appendix A. Demand zones	The description of Identifiers for Demand Zones in the BB Data Submission Guide specifies a 3 or 4 character reference to identify the pipeline however the identifier for the APLNG Pipeline 'APLNG-DE-01' shown in East Coast Gas System Procedures, Appendix A. Demand zones is 5 characters.	Pipeline: APLNG Pipeline Demand Zone: APLNG-DE-01 Description: APLNG Pipeline, Flow Type "Demand" connections, excluding Connected to Type: "GPC" connections, for Curtis Island region.	

BB Procedures			
Procedure Clause #	Issue / Comment	Proposed text <del>Red strik</del> means delete and <a href="#">blue underline</a> means insert	AEMO Response (AEMO only)

**BB Data Submission Guide**

Procedure Clause #	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
3.2.1. Identifiers for demand zones	The description of Identifiers for Demand Zones specifies a <i>3 or 4 character reference to identify the pipeline</i> . However the identifier for the APLNG Pipeline 'APLNG-DE-01' shown in East Coast Gas System Procedures, Appendix A. Demand zones is 5 characters.	3.2.1. Identifiers for demand zones Identifiers for demand zones (DemandZoneId) used in transactions and reports subscribe to the following format: Description <del>3 or 4</del> <u>3, 4 or 5</u> character reference to identify the pipeline	
3.2.1. Identifiers for demand zones	This clause states that a Part 27 relevant entity may report on multiple demand zone identifiers Does this clause contradict 4.21.2 Requirements which state that a gas forecast of zero must be submitted?	Demand zone identifiers have the following characteristics: · A Part 27 relevant entity may report on multiple demand zone identifiers.	
4.21.1. Data elements and fields	The Example/ Allowed Values for Demand Zone ID only indicate a 4 character reference for the pipeline when 3, 4 and 5 character references exist in Appendix A	Demand Zone Id - Example/ Allowed Values <u>'WPP-DE-02'</u> , 'SESA-DE-01', <u>'APLNG-DE-01'</u>	
4.21.2. Requirements	Red and Lumo seek clarification from AEMO on the requirement for a Part 27 retailer to provide expected daily gas demand if the Part 27 retailer has no customers and no demand across the East Coast Gas System. Will the Part 27 retailer be required to submit a null report by 10.00 pm each gas day D-1 for gas days D to D+6 for all demand zones? This clause requires a gas forecast of zero to be submitted, while clause 3.2.1 states that a Part 27 relevant entity <b>may</b> report on multiple demand zone identifiers	4.21.2. Requirements · Forecast Quantity values represent physical consumption to be supplied from the corresponding demand zone and must be submitted in TJs accurate to three decimal places. · Where there is zero gas forecast in a demand zone, a Forecast Quantity of zero must be submitted.	