

Notice to Participants of AEMO's decision on making the BB Procedures

AEMO advises all Registered Participants and other interested stakeholders that consultation on changes to the BB Procedures under ordinary process for making Procedures, prescribed in rule 135EE of the National Gas Rules (NGR), concluded on 29 March 2018.

Taking into account the assessment provided in the Impact and Implementation Report (IIR) and submissions made by consulted persons, AEMO hereby gives notice of its decision to make the proposed BB Procedures, effective from 30 September 2018.

AEMO's response to the submissions made during the consultation period are provided in Attachment A.

Further details and documentation around the consultation can be found at <https://www.aemo.com.au/Stakeholder-Consultation/Consultations/Improvements-to-Gas-Bulletin-Board>.

AEMO considers that the procedure changes meet the requirements of the National Gas Objective in that they promote the efficient operation and use of natural gas services with respect to price and security of supply.

Notice Date: 30 April 2018

Attachment A: Summary of stakeholder comments

This attachment presents a summary of stakeholders' comments in response to the Improvements to Gas Bulletin Board consultation, published by AEMO on 22 February 2018 as part of a formal consultation under Rule 135EE of the National Gas Rules (NGR).

Org	Summary of comment	Response
AGL	General – AEMO should avoid duplicating reporting requirements between its different systems (GGB, STTM, DWGM).	While such improvements are outside the scope of this project, they are currently being considered as part of a separate, future, package of work.
AGL	General – AEMO should avoid requiring reporting entities to provide updates where data is unchanged.	Where rules allow the use of default values (see short term capacity outlook for example) AEMO does not require reporting entities to provide updates.
AGL	BB Procedures - In section 7.3.3 each reporting entity is required to provide secondary trade data. It should be clarified that this only applies to entities listed on a secondary capacity trading platform.	This change is implemented in the final Procedures.
AGL	BB Procedures - The requirement for providing an explanation for material changes in free text in sections 7.4.1(f), 7.5.1(f), and 7.5.5(f), should be mandatory in the case of intraday changes and should be published the following day as in the NEM.	This would require a rule change. AEMO will provide feedback to the AEMC on this and other matters for the next round of changes. Changes to the Data Submission Procedures have also been made to reflect that descriptions for changes to nameplate rating or medium term capacity

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		outlook are required by the rules (now a mandatory data element).
AGL	BB Procedures - Section 7.5.1(b) should be reworded so that it is clear that nominations may be provided before the start of the gas day (as well as up to one hour after).	The provision states that submissions must be made 'no later than' one hour after the start of the gas day', which does not preclude submissions being made earlier than the start of the gas day.
AGL	BB Procedures – The submission time in section 7.6 should be aligned with Table 1 in Chapter 3 of the Data Submission Procedures.	This change is implemented in the final Procedures.
AGL	BB Procedures – Suggest rewording of section 7.5.5(c) for clarity - move “for gas day D+1 to gas day D+6” to after “Forecast Deliveries and Receipts”.	This change is implemented in the final Procedures.
SEAGAS	BB Procedures – Request that the requirement of providing a capacity description for each submission in section 7.4.1(b) be made non-mandatory as it will not provide useful information in general operations and requires input from senior personnel on a regular basis.	The capacity description is meant to provide more transparency about what capacity numbers represent in normal operating conditions. It will generally be the same as the description in the medium term outlook and nameplate rating information. We do not expect that this will be something that changes from day to day and it should not require input from senior personnel on a regular basis.
SEAGAS	BB Procedures – The requirement in section 7.4.1(e) is unreasonable in that it requires a pipeline operator to report on	Section 7.4.1(e) requires production facility operators, not pipeline operators, to report on

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	production facility capacity for a period. It is also misleading for a pipeline operator to report on an issue caused by an upstream producer as a capacity issue that relates to the pipeline itself.	production facility capacity. Further, AEMO does not expect that an issue that resides purely in a production facility would generally impact the reported capacity for a pipeline facility that is downstream of the production facility.
SEAGAS	BB Procedures – The new definitions in section 7.4.2(b) do not differentiate between situations where interruptible shippers are fully accommodated and where interruptible shippers are curtailed.	The purpose of the distinction between green and amber was to provide an indication as to whether physical capacity is available on the pipeline, while red would indicate to the broader market that something had gone wrong. From that perspective it doesn't matter if existing interruptible shipper's nominations are fully met or not. It is also hoped that these new definitions would be more clear than the existing definitions – the existing definitions have been applied inconsistently by different pipeline operators.
SEAGAS	BB Procedures – The requirement to provide forecast information in section 7.5.2 by 7pm is inconsistent with Day Ahead Auction and the rescheduling that will result. Suggest that the timeframe be delayed.	This change is implemented in the final Procedures, based on our current expectations for Day Ahead Auction timelines.
SEAGAS	Data Submission Procedures – For section 4.1.1, it would be good to understand the context for how delivery and receipt locations will be used.	As noted by our Procedures, these points are just an indication of the location and direction of the capacity. In practice, the GBB will use these as an identifier, to distinguish a capacity from other capacity numbers reported by the pipeline facility.

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SEAGAS	Data Submission Procedures – For section 4.2.2, for bidirectional flows are you referring to physical flows or notional ones? Cavan delivery point is bidirectional from a notional point of view, but can only physically deliver to the Adelaide Hub.	The daily production and flows report deals with physical flows only, which contrasts with the nominations and forecasts report which deals with notional flows. We have redrafted this section to clarify this point.
SEAGAS	Data Submission Procedures – Given the query above on section 4.2.2, and that section 4.4.2 assumes gate stations to only have a delivery capacity, how would we treat a connection point such as Cavan Delivery to the STTM?	Gate stations are treated no differently to any other connection point for the purposes of the daily production and flows report as well as for the nominations and forecasts report. Capacities relate to physical flows, and so gate stations need only report on their ability to deliver gas into a distribution system. Cavan delivery point meets the definition of a gate station under the definition set out in the National gas rules.
SEAGAS	Data Submission Procedures – Examples of the description fields would be useful.	AEMO will be providing examples in the data submission guides that will be published in accordance with the document release schedule located on the GBB website.
SEAGAS	Data Submission Procedures – How is an API key obtained? Can you provide complete examples of submissions and responses?	As for the above question, guides will be published in accordance with the document release schedule.
Origin	General – Origin supports the reduced timeframe for the provision of actual production and flow data.	Noted, the timeliness of reporting is considered critically important for the GBB.

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Origin	General – Origin supports efforts to improve the transparency of information relating to pipeline capacities, particularly for the Victorian Northern Interconnect.	AEMO considers that the current GBB does not provide sufficient clarity around pipeline capacity from the perspective of potential shippers and welcomes such feedback on these, and future efforts to improve transparency.