

Notice of apparent breach of WA Retail Market Procedures clauses 228(3), 246(1), 248(1), 286, 287(1), 288(1), 296(1), 299(1), 300(1), 300(2)(a)-(f), 300(3), 302(3) by AEMO from 01/09/2017 to 03/09/2017

#### Overview:

From 01/09/2017 to 03/09/2017, the delivery of a number of gas market reports were delayed by 20 minutes or less. This was caused by a one-off data purging activity in the WA Gas Retail Market System ("GRMS") on 31/08/2017 resulting in an issue with the gas day calculations which has delayed the provision of the gas market reports. The data purging activity was tested in a test environment with a different version of the database server from the one in the production environment and so the issue was not identified during testing.

This appears to be a breach of clauses 228(3), 246(1), 248(1), 286, 287(1), 288(1), 296(1), 299(1), 300(1), 300(2)(a)-(f), 300(3), 302(3) of the WA Retail Market Procedures ("Procedures") by AEMO.

The clauses of the Procedures read as follows:

#### 228. User's estimated total withdrawals

(3) For each user for each sub-network for each gas day D, within 5 hours after the end of gas day D, AEMO must notify the user of the interval-metered withdrawals for each of the user's interval-metered delivery points in the sub-network provided to AEMO on each gas day in the period between gas day D and gas day D-6 under clause 158(1)(c).

#### 246. Calculate shipper's deemed injections

- (1) For each shipper or swing service provider (as applicable) for each gate point for each gas day, within 5 hours, as applicable, after the end of the gas day, AEMO must calculate, and advise the shipper or swing service provider (as applicable) and the pipeline operator of the shipper's deemed injections by:
- (a) first, for each user in the sub-network, taking the user's estimated total withdrawals in the sub-network for the gas day calculated under clause 228 and allocating it across shippers or swing service providers (as applicable):
  - (i) for each part of the user's estimated total withdrawals that is one of the user's swing service repayment quantities for the sub-network for the gas day, to the swing service provider who must repay the user's swing service repayment quantity under clause 299; and
  - (ii) for the remainder of the user's estimated total withdrawals in accordance with the user's allocation instruction for the gas day under clause 188: and
- (b) then summing all amounts allocated by user to the shipper or swing service provider (as applicable) under clause 246(1)(a).

#### 248. Calculate user's deemed withdrawals for a pipeline

- (1) For each user for each gate point for each gas day, within 5 hours after the end of the gas day, AEMO must calculate, and notify the user and the network operator of the user's deemed withdrawals ("UDW") by:
- (a) first, taking the user's estimated total withdrawals for the sub-network for the gas day calculated under clause 228 and allocating it across the user's related shippers or swing service providers (as applicable):
  - (i) for each part of the user's estimated total withdrawals that is one of the user's swing service repayment quantities for the sub-network for the gas day, to the swing service provider who must repay the user's swing service repayment quantity under clause 299; and
  - (ii) for the remainder of the user's estimated total withdrawals in accordance with the user's allocation instruction for the gas day under clause 188; and
- (b) then, summing the amounts calculated under clause 248(1)(a) in respect of allof the user's related shippers or swing service providers (as applicable) for the gate point.

#### 286. AEMO to publish bid stack

For each gate point, AEMO must make available the bid stack to users and swing service providers within 5 hours after the end of the gas day, setting out for each bid the volume and price of the bid but not the identity of the swing service provider who lodged the bid.

# 287. Determine marginal clearing price for total amount of swing service to be procured through applicable bid-stack

(1) For each gate point for each gas day, within 5 hours after the end of the gas day, AEMO must determine in accordance with clause 287(2), and publish to users and swing service providers, the marginal clearing price for the total amount of swing service to be procured through the applicable bid stack ("MCP(TSS(BS))"), which is expressed in cents, up to three decimal places, per megajoule.

# 288. Determine marginal clearing price for adjusted non-user-specific amounts of swing service

(1) For each gate point for each gas day, within 5 hours after the end of the gas day, AEMO must determine in accordance with clause 288(2), and publish to users and swing service providers, the marginal clearing price for the total of all adjusted nonuser-specific amounts of swing service ("MCP(ANUSA)"), which is expressed in cents, up to three decimal places, per megajoule.

### 296. Swing service contract note

(1) For each allocation made under clause 295, AEMO must, within 5 hours after the end of the gas day, give a contract note to the user and the swing service provider, specifying:

- (a) the name of the swing service provider;
- (b) the name of the user;
- (c) the gate point to which the allocation relates;
- (d) the FSS to be paid to the swing service provider by the user determined under clause 295(1);
- (e) whether the allocated swing service is park swing service or loan swing service;(f) the SSA provided to the user by the swing service provider determined under clause 295(2), in megajoules;
- (g) the gas day in respect of which the allocation under clause 295 was made.

### 299. Calculation of swing service repayment quantities

(1) AEMO must, by 5 hours after the end of gas day D determine under clause 299(2), and notify the user and the swing service provider and the swing service provider of last resort of, the swing service repayment quantity ("SRQ") for each swing service provider and swing service provider of last resort that must repay swing service on gas day D+2 on the user's behalf.

#### 300. Notification of swing service data

- (1) For each gas day for each gate point, AEMO must within 5 hours after the end of the gas day notify the pipeline operator, users and their related shippers and the network operator of the swing service for the gate point calculated under clause 256.
- (2) For each user for each gas day for each gate point, AEMO must within 5 hours after the end of the gas day notify the user of:
- (a) the user's total (pre-procurement) swing service (USS) for the gate point for the gas day calculated under clause 262;
- (b) the user's user-specific amount of swing service (USA) for the gate point for the gas day calculated under clause 263;
- (c) the user's non-user-specific amount of swing service (NUSA) for the gate point for the gas day calculated under clause 266;
- (d) the user's adjusted non-user-specific amount of swing service (ANUSA) for the gate point for the gas day calculated under clause 272;
- (e) the user's adjusted user-specific amount of swing service (AUSA) for the gate point for the gas day calculated under clause 274; and
- (f) the sum across all users of the absolute value of each user's user's estimated total withdrawal for the sub-network for the gas day;
- (3) For each gate point for each gas day, within 5 hours after the end of the gas day, AEMO must notify each user and each swing service provider who is a party to an applied request under clause 270 for the gas day of the details of the applied request including the quantity allocated in the applied request.

## 302. Multi shipper allocation agreement

- (3) For each pipeline for each sub-network for each gas day, within 5 hours after the end of the gas day, AEMO must:
- (a) provide to the pipeline operator a "multi-shipper allocation report" setting out the information referred to in clause 302(2) for each shipper and swing service provider on the pipeline; and
- (b) provide to each shipper and swing service provider on the pipeline, a shipper's "multi-shipper allocation report" setting out the information referred to in clause 302(2) for the shipper or swing service provider.

# Impact:

The delivery of the below market reports from 01/09/2017 to 03/09/2017 were delayed by 20 minutes or less:

- 57 BID-PUB
- 57 MCP-TANUSA
- 57 MCP-TSS
- 54 SRQ
- 66 SS
- 24 UETW
- 18 USS
- 21 BID-ALLOC
- 98 DGQ
- 98 DI
- 18 INTMR
- 48 OMP-APP
- 27 UDW

#### Resolution:

AEMO sent a notification to the WA market participants on 03/09/2017 that the market reports would be delayed until further notice. On 04/09/2017, the issue was resolved and the market reports were delivered to the participants within the time specified in the Procedures.

# **Proposed Further Actions:**

AEMO to ensure that testing is carried out in a test environment that has the same set up as the production environment before deployment to the production environment.

#### Invitation for submissions:

Before determining whether any further action is required, AEMO invites written submissions from participants as to:

- the effect that this incident has on their operations, and
- their view with regard to the determination, if any, AEMO should make under clause 329 of the Procedures in respect of the apparent breaches of the Retail Market Procedures.

Submissions are requested by no later than 5:00pm (AEST) **Thursday 9 November 2017**. Submissions should be sent by e-mail to <a href="mailto:rmo@aemo.com.au">rmo@aemo.com.au</a>.

Alternatively, submissions can be sent by post to AEMO at:

Chin Chan AEMO GPO Box 2008 Melbourne, VIC 3001

If you have any questions regarding this matter, please contact Carol Poon on (03) 9609 8509.

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