

Minutes

Meeting:	Industry-Wide Gas Transparency Measures Workshop
Date:	Wednesday, 14 September 2022
Time:	3:00PM
Location:	Teleconference

Attendees:

Name	Company
Adam Watson	AEMO
Chris Warren	AEMO
Darryl White	AEMO
David Younger	AEMO
Jordan Daly	AEMO
Luke Stevens	AEMO
Nipun Saxena	AEMO
Saul Milner	AEMO
Adele McCormack	ENGIE
Alanna Gibson	GLNG
Andrew Godfrey	Alinta
Andrew John	ENGIE
Angus Holcombe	Telstra
Anthony Hill	ETSI
Balaji BH	Western Power
Ben Lewis	Westside
Ben Vesty	AGL
Brooke Hill	CQ Energy
Catherine Dawson	Unknown
Chotima Micallef	Lochard
Christina Sutherland	GLNG
Cody Lin	Visy
Courtney Czechowski	Origin
Damien Kennedy	AGL
Dan Mascarenhas	Alinta
Daniel Tucci	APA
Darryl Nielsen	Unknown
Dave Flower	Energy One
David Habib	Epic
David Rodwell	Macquarie

Name	Company
Denis Gisolde Golim	Origin
Derek Unterburger	Westside
Devrim van Dijk	AGL
Dominic Acock	Origin
Edward Knowlman	MinterEllison
EE Siew Ong	Lochard
Elias Bozoglou	Palisade IMS
Greg Fawcett	ENGIE
Greg Sollis	Unknown
Isabelle Lawder	APA
Ivan Litvinov	ENGIE
Jamie Coombs	SEAGas
Jordan McCollum	APGA
Keith Brown	Origin
Kirsten Kenny	Shell
Kunal Gupta	Unknown
Lakhan Kumar	Unknown
Leonor Lee	Jemena
Liz Gharghori	AGL
Marika Suszko	AGL
Mark Riley	AGL
Matt Arnold	Arrow
Methsiri Aratchige	Origin
Murty M Paluri	Unknown
Nick Flint	Epic
Nitin Parwal	Beach
Nives Matosin	APA
Owen Holloway	Unknown
Patrick Lau	Tel Pacific
Paul Bresloff-Barry	Agora
Peter Lowke	Alinta
Philip PR Platt	Unknown
Przemek Grobelski	Beach Energy
Ravindran UNKNOWN	Unknown
Rebecca Johnson	Origin
Rebecca Mason	APA
Ricky Kennewell	Origin
Robbie Flood	CSR
Robert Matton	AER
Robin Coombe	Venice
Rupert Cheung	Alinta
Rupert Johnston	Unknown

Name	Company
Ryan Middleton	Santos
Samantha Staunton	Unknown
Sahithi Ratna DV	Unknown
Sean Harvey	Unknown
Shane Ng	Energy Australia
Shounan Chen	APA
Terrence Quach	Unknown
Thomas Lozanov	Origin
Tony Tang	Shell
Tony Vu	ENGIE
Troy Olcorn	Energy Australia
Vanessa De Cruz	Unknown
Venkata Siva Kumar Kottana	Unknown
Vin Mani	Unknown

1 Housekeeping

1.1 Welcome & agenda

Jordan Daly (AEMO) welcomed attendees to the meeting and outlined the agenda. No apologies were received.

1.2 Consultation update

Jordan Daly (AEMO) spoke to the update to consultation timeframes according to the slide. No comments were received on this matter. It was noted that the matters discussed in sections 2.1-2.3 of this meeting were previously flagged by APGA in a meeting held with AEMO on 12 September 2022.

2 BB Procedures

2.1 Criteria for Classification (BB 3.7.1).

David Younger (AEMO) spoke to this matter according to the slides. He requested comment on the proposed definition of 'proposed projects'. Tony Tang (Shell) confirmed that the 'or' statements had become 'and' statements. David Younger (AEMO) emphasised that AEMO is considering this proposed drafting and has presented it to participants. Kirsten Kenny (Shell) stated a preference for having a balanced definition that suits the purpose of the proposal well. She queried whether the 'reasonable expectation' could apply to the obtaining of 'all necessary approvals'.

Rebecca Mason (APA) stated that the preference is for projects to be 'highly likely' before they are disclosed and that the proposed wording aligns with the ASX's requirements.

2.2 Nominated and forecast delivery information for BB pipelines – non-firm haulage (BB 6.4.2)

David Younger (AEMO) spoke to this matter according to the slides and noted that AEMO was considering this proposal further. Jordan McCollum (APGA) emphasised that the basis for the inclusion of interruptible services in this clause is that they're forecast following auctions occurring. Nick Flint (Epic) stated that the ability of an organisation to provide a 7-day forecast can be difficult, especially given variable and non-scheduled generation can be difficult to forecast. David Younger (AEMO) noted that there will always be challenges in putting a 7-day forecast together, and that the Procedures request a reasonable forecast, even if the forecast is not entirely reliable due to factors beyond an organisation's control.

However, Jamie Coombs (SEAGas) stated their shippers provide weekly 7-day forecasts, but the level of granularity (EG: day-by-day forecasts accounting for days of the week) occur in none of these. The best estimate that can be provided would be on a rolling basis, based on information provided by shippers. This was noted by AEMO for further consideration.

2.3 Linepack Capacity Adequacy Flags (BB 6.3.2)

David Younger (AEMO) spoke to this matter according to the slides. The intent of the definition is to refer to:

- The interruption or curtailment of non-firm capacity, or
- Where the short-term capacity outlook is reduced by 20% compared to nameplate capacity, or
- Where a facility is at-capacity, and there is a capacity restriction into a hub.

The circumstances in which an amber flag may be applied are quite complex, and its application may be unworkable. Jamie Coombs (SEAGas) stated they have concerns regarding these definitions. For example, when total pipeline nominations are 80% of capacity, maintenance can be done on compressors which would reduce capacity without having an impact on potential nominations. This was noted by AEMO. Regarding the last part of the definition, pricing is typically not managed by pipelines - this responsibility should fall upon AEMO. This was noted by AEMO.

Nick Flint (Epic) expanded on the first dot point - maps will often go to Amber if one delivery point were at capacity, even if the rest of the map were at capacity. Jamie Coombs (SEAGas) asked what the intent of the flags is. Overall, if firm, other services and capacity are available on a pipeline, an amber flag may be misleading. David Younger (AEMO) stated the definition is to flag when a pipeline is at capacity and when no additional gas could be shipped at that time.

Mark Riley (AGL) asked 'do you need a flag where capacity is reduced (eg for maintenance) but no expected impact - kind of a PASA flag'. David Younger (AEMO) stated this can be seen in the Short-Term and Medium-Term Capacity Outlooks, but these are not visualised on a map.

2.4 Methods Available to Submit Data to the GBB (BB 5.1)

Adam Watson (AEMO) spoke to this matter according to the slides and clarified the difference between the simple and regular processes.

2.5 Other feedback not captured in response to the Draft IIR.

David Younger (AEMO) noted that AEMO is receiving queries from ServiceNow and requested some patience with responses.

Tony Tang (Shell) asked 'Jordan, did you have any updates from the rego team on the registration process - eg. a fast-tracked registration for existing reporting entities for new registrable capacities etc?'. Jordan Daly (AEMO) to follow up.

Edward Knowlman (MinterEllison) asked about the definition of 'trade date'. Adam Watson (AEMO) stated this refers to the date the trade was made. David Younger (AEMO) suggested this refers to the date of the transaction. David Younger (AEMO) to follow up.

Thomas Lozanov (Origin) asked about the new obligations placed on large user facilities (presumably including gas-powered generators). He is looking to confirm whether pipeline operators would report the same data to AEMO and whether the former parties could apply for exemptions. David Younger (AEMO) stated this would be taken into consideration when developing forms for participants. Thomas Lozanov (Origin) asked if the reporting entity for new BB obligations the pipeline operator or owner.

Andrew Godfrey (Alinta) asked regarding the GSOO requirements: A lot of the Rules don't apply until 1 January, but is there an expectation to provide the same information via the Survey, even if the Procedures aren't in effect. Jordan Daly (AEMO) to follow up.

Andrew Godfrey (Alinta) requested the updated technical specifications. David Younger (AEMO) stated this is on the consultation page and updates would be provided as they emerged.

Tony Tang (Shell) asked 'on the topic of exemptions, is the deadline for exemptions also the registration deadline?'. David Younger (AEMO) noted that registration and other dates were yet to be finalised but participants would be informed of them once they become firmer.

Rebecca Mason (APA) stated 'Just to confirm APA's view is that whilst Pipeline Operators may be providing daily flow data, we're not anticipating that Pipeliners will provide the data specifically or separately for large users. It is our interpretation of the NGR that this is an obligation on large user facilities. If this is not the case, please advise ASAP.'. Tony Tang (Shell) stated they were intending on applying for an exemption for a station - will the obligation to report be on the large user facilities or the pipeline operators? Rebecca Mason (APA) stated their interpretation was that in the case of the Diamantina facility, the facility would provide the data, and APA wouldn't, and that system changes would be required if APA were obliged to provide the same information.

Courtney Czechowski (Origin) requested updated deadlines and information on whether the go-live date for the BB Procedures will be shifted, and if the IT cutover can't occur in time, can manual submissions be made. David Younger (AEMO) confirmed further information would be provided as it emerges.

Greg Fawcett (ENGIE) requested clarification on how reporting obligations could avoid being 'doubled up' between large users and pipeline operators. David Younger (AEMO) stated that this is being looked into and outworked.

3 Meeting close

Jordan Daly (AEMO) closed out the meeting. Additional feedback is welcomed and can be sent to gwcf_correspondence@aemo.com.au.

4 Questions Received

Query	Received from	AEMO response
AEMO to consider criteria for Classification (BB 3.7.1).	Draft IIR Feedback & APGA.	This matter will be addressed in AEMO's Notice of Decision.
AEMO to consider nominated and forecast delivery information for BB pipelines – non-firm haulage (BB 6.4.2)	Draft IIR Feedback & APGA.	This matter will be addressed in AEMO's Notice of Decision.
AEMO to consider Linepack Capacity Adequacy Flags (BB 6.3.2)	Draft IIR Feedback & APGA.	This matter will be addressed in AEMO's Notice of Decision.
AEMO to redraft response regarding Methods Available to Submit Data to the GBB (BB 5.1)	Jemena.	This matter will be addressed in AEMO's Notice of Decision.
Registration – processes (EG: fast-tracking for existing reporting entities) & draft forms. Is the deadline for exemptions also the registration deadline?	Tony Tang (Shell).	<p>AEMO is unable to 'fast-track' applications – these will go through normal channels. If a participant is already registered, and uses the simplified application, the process will otherwise be the same.</p> <p>Regarding the deadline for exemptions, AEMO will provide further information on this as implementation timeframes become clearer.</p>
AEMO to clarify the definition of 'trade date'	Edward Knowlman.	<p>Trade date has the following definition as per 141(1) of the Gas Market Transparency Rule 2022:</p> <p>trade date means for a transaction, the date on which the transaction is entered into.</p>

Query	Received from	AEMO response
<p>AEMO to clarify the obligations placed on reporting regarding what falls upon pipeline operators vs large user facilities, to avoid doubling up.</p>	<p>Thomas Lozanov (Origin), Rebecca Mason (APA), Greg Fawcett (ENGIE).</p>	<p>Notes: Expanded response below table</p>
<p>AEMO to clarify GSOO requirements: A lot of the Rules don't apply until 1 January, but is there an expectation to provide the same information via the Survey, even if the Procedures aren't in effect.</p>	<p>Andrew Godfrey (Alinta).</p>	<p>The Rules don't make information provision mandatory, but AEMO would appreciate participants filling out the surveys to their fullest extent. For any critical information AEMO requires for the GSOO - we might consider a Market Information Notice as we've done previously, should we not get the data. Also, noting the strong interest from Governments in gas reliability, there will be strong political focus on the extent of participants are responding to this.</p>
<p>AEMO to circulate further information on implementation dates, as well as whether manual submissions can be made if the IT cutover can't occur in time.</p>	<p>Courtney Czechowski (Origin).</p>	<p>This matter will be circulated following discussions with the AER and addressed in AEMO's Notice of Decision.</p>
<p>AEMO to clarify how swaps are to be reported to the BB. For example, swaps occur as two distinct sales at market price for many participants.</p>	<p>Alanna Gibson (GLNG). Note: This query was received 19 September 2022.</p>	<p>This matter will be addressed in AEMO's Notice of Decision.</p>
<p>How Rule 183 and BB cl 6.4.2 are intended to apply to a pipeline which does provide third party access and which can/does normally receive nominations from shippers. In the circumstance where that pipeline receives forecast nominations from some (but not all) shippers for the 7 day outlook period, is the pipeline required to submit a 'hybrid' outlook comprising nominations received plus</p>	<p>James Harding (Jemena). Note: This query was received 20 September 2022.</p>	<p>This matter will be addressed in AEMO's Notice of Decision.</p>

Query	Received from	AEMO response
its own forecasts in respect of the few shippers who have not submitted nominations for firm capacity?		

Reporting: BB Large User Facilities

Nameplate Capacity

As per NGR 168 and section 6.1 of the BB Procedures.

A BB reporting entity for a BB large user facility must submit nameplate capacity data to the Bulletin Board.

In the case where the BB large user facility is already directly connected to a BB facility (and gas is consumed solely by the BB large user facility at that offtake), the BB reporting entity for that facility may already be submitting nameplate capacity data for the BB large user facility to meet its own reporting requirements. If this is the case, an exemption may be requested under NGR 164(2).

Daily Consumption Data

As per NGR 189 and section 6.5.3 of the BB Procedures.

Data for BB large user facilities are submitted by the BB reporting entity. An exemption can be obtained if:

- AEMO is receiving the data as operator of a regulated retail market; or,
- AEMO is receiving the data from another BB reporting entity.

In the case where the BB large user facility is already directly connected to a BB facility (and gas is consumed solely by the BB large user facility at that offtake), the BB reporting entity for that facility will already be submitting data for the BB large user facility to meet its own reporting requirements.

Appointment of an Agent

As per NGR 162 and section 3.9 of the BB Procedures.

A BB reporting entity may nominate a person to act as a BB reporting agent on their behalf. The BB reporting agent is not eligible to use the simplified registration process and must submit documentary evidence that they have authority to act on behalf of the BB reporting entity.

Registration

NGR 164 Availability and effect of exemptions (AEMO to respond within 20 business days)

NGR 190 Exemptions for the provision of daily consumption data (AEMO response time not specified)

If the BB reporting entity wishes to register a BB large user facility they have two options:

1. Simplified Market Registration Process

This process can be used in instances where a BB reporting entity is applying to register and will simultaneously submit an exemption request for the submission of daily consumption data due to:

- AEMO receiving the data as operator of a regulated retail market; or,
- AEMO will receive the data from another BB reporting entity;

Even if exempted from the submission of daily consumption data, nameplate capacities are still required to be submitted for BB large user facilities.

BB reporting entities that intend to submit daily consumption data are ineligible to apply via the simplified market registration process.

2. BB reporting entity registration

This process is used where the simplified process is not applicable (i.e. consumption data is to be required). This process will give registered BB Entities access to AEMO's IT systems to enable submissions on the portal and via APIs.

Participants who have previously submitted a request for simplified registration but have had their exemption request from submitting consumption data denied, will need to start again and submit the BB reporting entity registration form.

As discussed on the call AEMO will be aiming to set dates before registration cut-off to process exemptions. AEMO will try to process all exemptions and notify applicants of outcomes ahead of time, so that BB reporting entities who have had exemption requests rejected may resubmit their registration application if required.