

INVESTIGATION OF THE UNEXPECTED SCHEDULING OUTCOMES FOR GAS DAYS 7/2/2011 AND 3/10/2011

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1 Background

In accordance with rule 218 (1) of the National Gas Rules (NGR), AEMO initiated an investigation of scheduling results in response to a Helpdesk call raised by a Market Participant (MP) in relation to its abnormal imbalance payments for gas day 3 October 2011. The results of the investigation reveal that:

- AEMO scheduling did not use the most recent valid demand forecasts submitted by MPs on two occasions since February 2007; these happened while creating the 6am schedules on gas days 7 February 2011 and 3 October 2011. For these schedules, AEMO's scheduling process started before the demand forecasting process was completed. Consequently, these schedules were generated using MPs' day ahead (D+1) demand forecasts submitted before 10pm instead of any updated demand forecasts submitted between 10pm and 5am prior to the commencement of the relevant gas day;
- the estimated impact on scheduling and settlement outcomes for gas days 7 February 2011 and 3 October 2011 did not meet the materiality test for an unintended scheduling result set out in rule 217(4); and
- these circumstances also affected the 6am schedule for 25 October 2008, but as there were no changes to demand forecast between 10pm and 5am there was no impact.

AEMO has prepared this report in accordance with rule 218 (3) to present its decision and the reasons for its decision on whether the above events are unintended scheduling results.

2 Event assessment

2.1 Estimated financial impact

The estimated financial impact for 7 February 2011 and 3 October 2011 is set out in Table 1. Table 1 shows that for each of the above events:

- no MP was better off (under-charged) by more than \$5,786;
- no MP was worse off (under-paid) by more than \$4,987; and
- the total financial impact for all MPs was less than \$11,187.

Detailed analyses are included in Appendix A for 7 February 2011 and in Appendix B for 3 October 2011.

Table 1: Summary of financial effect on Market Participants

	7 February 2011	3 October 2011
Number of MP under-charged	11	12
Maximum under-charged amount	\$5,786	\$1,350
Number of MP under-paid	9	8
Maximum under-paid amount	\$4,987	\$1,357
Total financial impact*	\$11,187	\$3,870

*this is the amount of money expected to be paid by all MPs who would be under-charged to those who would be under-paid.

2.2 Assessment against NGR 217 criteria for unintended scheduling results

The NGR requirements for assessing unintended scheduling results are provided in rule 217. The events on 7 February 2011 and 3 October 2011:

- met the criteria for unintended scheduling results when assessed against rule 217(1);
- were not relevant to the criteria in rules 217(2) and (3); and
- did not meet criteria for unintended scheduling results when assessed against rule 217(4).

Table 2 summarises AEMO’s assessment of these unexpected scheduling outcomes against NGR 217.

Table 2: Assessment against NGR 217

Assessment criteria - NGR 217	Assessment
<p>217 (1) <i>If scheduling instructions issued as part of an operating schedule produce one or more of the following results:</i></p> <p>...</p> <p>(f) <i>a scheduling instruction is not issued in accordance with the gas scheduling procedures, then that result will be an intended scheduling result unless otherwise specified in subrules (2), (3) or (4).</i></p>	<p>For the 6am schedules on gas days 7 February 2011 and 3 October 2011, AEMO scheduling did not use MPs’ most recent validated demand forecasts. As such, AEMO scheduling instruction was not issued in accordance with clause 3.6.2 of the Wholesale market gas scheduling procedures (Victoria) which states:</p> <p><i>“When producing schedules, AEMO will apply validated revisions to demand forecasts for the first hour of the relevant scheduling horizon until the end of the gas day”.</i></p>
217 (2) (exception subrule)	Not applicable
217 (3) (exception subrule)	Not applicable
<p>217 (4) (exception subrule)</p> <p><i>A result specified in subrule (1) will not be an unintended scheduling result unless its estimated financial effect on Market Participants exceeds either:</i></p> <p>(a) <i>for an individual Market Participant, \$20,000, adjusted to reflect the change in the Consumer Price Index in accordance with subrule (5); or</i></p> <p>(b) <i>for all individual Market Participants, an aggregate of \$50,000, adjusted to reflect the change in the Consumer Price Index in accordance with subrule (5).</i></p>	<p>As shown in Table 1 above, the financial impact for:</p> <ul style="list-style-type: none"> • an individual MP is less than \$5,786 and \$1,357 for gas days 7 February 2011 and 3 October 2011 respectively; and • for all individual MPs is less than \$11,187 and \$3,870 for gas days 7 February 2011 and 3 October 2011 respectively. <p>Because the financial impact is below the specified threshold for both gas days, neither result meets all criteria for an unintended scheduling result.</p>

3 AEMO decision

Because the financial impact for each individual MP and all MPs in aggregate is below the amount specified in NGR 217, **AEMO has determined that the scheduling outcomes on gas days 7 February 2011 and 3 October 2011 did not meet the criteria for unintended scheduling results.**

4 Causes

The process of running a schedule requires that market systems complete some tasks in sequence. One such task is the demand forecast process whereby all individual MP demand forecasts are aggregated as an input to the scheduling process. Normally, there is sufficient time after the scheduled start of the demand forecast process to allow it to complete before the scheduling process starts.

On the three days in question (out of over 1,700 days since commencement of new rules in February 2007), the demand forecast process ran longer than usual. Market systems do not confirm that the demand forecast process has completed, and so an earlier valid demand forecast was used.

5 Preventative actions

AEMO has reviewed market systems that allowed scheduling processes to start before the demand forecasting process was completed, and:

- has implemented process changes to ensure that the scheduling process does not start until the demand forecasting process has completed; and
- will implement system changes to prevent scheduling process do not start until the demand forecasting process has completed.

AEMO expects that these steps will prevent a future occurrence of these outcomes.

Appendix A - Detailed analysis of 7 February 2011

Two MPs submitted updated demand forecasts between 10pm and 5am prior to the commencement of the gas day. The updated demand forecasts were higher by 10,601 GJ than the day ahead (D+1) demand forecasts submitted before 10pm. However, the updated demand forecasts were not used in the 6am schedule. For the purpose of the analysis presented below, AEMO generated the expected scheduling results (after the event) using the correct demand forecasts. The expected changes to scheduling and settlement outcomes are discussed below.

Expected changes to gas price

Table 3 shows the published and expected gas price for each schedule. The gas price for the 6am schedule would have increased by \$0.28 to \$3.11 due to the increased scheduled injections to meet the increased forecast demand.

Table 3: Market prices

Schedule	6am	10am	2pm	6pm	10pm
Published	\$2.8300	\$3.4907	\$3.4907	\$3.4907	\$3.4907
Expected	\$3.1100	\$3.4907	\$3.4907	\$3.4907	\$3.4907
Change	\$0.2800	\$0.0000	\$0.0000	\$0.0000	\$0.0000

Expected changes to demand forecasts, scheduled controllable injections and controllable withdrawals

The following changes to scheduling outcomes would occur:

- 6am scheduling horizon: an increase in net withdrawals of 8,143 GJ (due to 10,601 GJ increase in demand forecasts from 2 affected MPs and 2,458 GJ decrease in scheduled controllable withdrawals from 2 affected MPs) matched by an equal increase in controllable injections (affecting 3 MPs);
- 10am scheduling horizon: a decrease in scheduled controllable withdrawals of 42 GJ (due to changes to withdrawal bids before 9am and affecting 1 MP) balanced by an equal decrease in scheduled injections (affecting 1 MP); and
- there would be no changes in demand forecasts, scheduled controllable withdrawals and injections for the remaining 3 scheduling horizons.

Table 4 summarises the expected changes in scheduled quantities and demand forecasts for each scheduling horizon.

Table 4: Expected changes to demand forecasts, scheduled controllable injection and withdrawal quantities

Scheduling horizon	6am-6am	10am-6am	2pm-6am	6pm-6am	10pm-6am
	Published quantities				
Demand forecast (GJ)	450,076	366,204	245,876	171,236	101,596
Controllable withdrawals (GJ)	66,611	52,959	53,802	41,682	21,703
Controllable injections (GJ)	539,018	470,804	342,571	251,343	165,580
	Expected quantities				
Demand forecast (GJ)	460,677	366,204	245,876	171,236	101,596
Controllable withdrawals (GJ)	64,153	52,917	53,802	41,682	21,703
Controllable injections (GJ)	547,160	470,762	342,571	251,343	165,580
	Expected changes to quantities				
Demand Forecast (GJ)	10,601	0	0	0	0
Controllable withdrawals (GJ)	-2,458	-42	0	0	0
Controllable injections (GJ)	8,143	-42	0	0	0

Table 5 shows the breakdown of the changes to demand forecasts, controllable withdrawals and injections by scheduling interval and summed for each scheduling horizon and schedule.

Table 5: Expected changes to demand forecasts, scheduled controllable injection and withdrawal quantities broken down by scheduling interval

Scheduling interval	6am	10am	2pm	6pm	10pm
Changes to demand forecasts (GJ)					
6am-10am	5,235	0	0	0	0
10am-2pm	1,831	0	0	0	0
2pm-6pm	659	0	0	0	0
6pm-10pm	1,703	0	0	0	0
10pm-6am	1,173	0	0	0	0
Total for scheduling horizon	10,601	0	0	0	0
Total for schedule	10,601	0	0	0	0
Changes to controllable withdrawals (GJ)					
6am-10am	-375	-375	-375	-375	-375
10am-2pm	-416	-42	-42	-42	-42
2pm-6pm	-417	0	0	0	0
6pm-10pm	-417	0	0	0	0
10pm-6am	-834	-0.4	0	0	0
Total for scheduling horizon	-2,458	-42	0	0	0
Total for schedule	-2,458	-417	-416	-416	-416
Changes to controllable injections (GJ)					
6am-10am	1,350	1,350	1,350	1,350	1,350
10am-2pm	1,358	-64	-64	-64	-64
2pm-6pm	1,358	5	0	0	0
6pm-10pm	1,358	5	0	0	0
10pm-6am	2,717	11	0	0	0
Total for scheduling horizon	8,143	-42	0	0	0
Total for schedule	8,143	1,308	1,287	1,287	1,287

Changes to imbalance quantities and payments

Table 6 shows the published and expected total market imbalance quantities and payments. The largest changes would occur in the first 2 schedules.

- 6am schedule: the market would have been under-paid by \$6,252 in imbalance payments due to increased gas price even though there was no change in imbalance quantity;
- 10am schedule: The market would have been under-paid by \$6,021 in imbalance payments caused by a negative change in net imbalance quantity of -1,725 GJ (due to a decrease of 417 GJ in controllable withdrawals and an increase of 1,308 GJ in scheduled injections. See details in Table 5);

- 2pm schedule: the market would have been under-charged by \$44 in imbalance payments caused by a positive change in net imbalance quantity of 22 GJ (due to 1 GJ increase in controllable withdrawals (= -416 GJ +417 GJ) and 21 GJ decrease in controllable injections (= 1,287 GJ – 1,308 GJ). See details in Table 5);
- no changes to imbalance quantities in other schedules of the gas day; and
- in total, the market would have been underpaid by \$12,229 in daily imbalance payments.

Table 6: Expected changes to imbalance quantities and payments

Schedule	6am	10am	2pm	6pm	10pm
Published imbalance quantities and payments					
Imbalance withdrawal (GJ)	516,687	17,776	-14,898	222	-6,085
Imbalance injections (GJ)	539,018	20,824	-34,398	-5,585	-2,907
Net imbalance quantity (GJ)	-22,331	-3,048	19,500	5,807	-3,178
Gas price (\$/GJ)	\$2.8300	\$3.4907	\$2.0001	\$2.0001	\$2.0213
Imbalance payments (\$)	-\$63,196	-\$10,638	\$39,001	\$11,615	-\$6,423
Daily imbalance payments (\$)					-\$29,641
Expected imbalance quantities and payments					
Imbalance withdrawal (GJ)	524,830	9,217	-14,898	222	-6,085
Imbalance injections (GJ)	547,160	13,989	-34,420	-5,585	-2,907
Net imbalance quantity (GJ)	-22,331	-4,772	19,522	5,807	-3,178
Gas price (\$/GJ)	\$3.1100	\$3.4907	\$2.0001	\$2.0001	\$2.0213
Imbalance payments (\$)	-\$69,448	-\$16,659	\$39,045	\$11,615	-\$6,423
Daily imbalance payments (\$)					-\$41,870
Expected changes to imbalance quantities and payments					
Gas price (\$/GJ)	\$0.2800	\$0.0000	\$0.0000	\$0.0000	\$0.0000
Net Imbalance quantity (GJ)	0	-1,725	22	0	0
Imbalance payments (\$)	-\$6,252	-\$6,021	\$44	\$0	\$0
Daily imbalance payments (\$)					-\$12,229

Changes to deviation quantities and payments

6 February 2011

The 6am gas price increase for gas day 7 February 2011 would have impacted the deviation payments for the 10pm scheduling interval for gas day 6 February 2011. Consequently, MPs would have been under-paid by an additional \$11,235 in deviation payments for 40,129 GJ of deviation quantity incurred in that scheduling interval. See details in Table 7.

Table 7: Expected changes to deviation payments

	10pm scheduling interval (6 Feb 2011)
Deviation quantity (GJ)	40,129
Change in deviation payments	\$11,235

7 February 2011

MPs' deviation quantities would not have been impacted because:

- settlement system used the correct demand forecasts for the 6am-10am scheduling interval in the 10am schedule to calculate deviation quantities; and
- no change to injection and (controllable) withdrawal deviation quantities would be expected as it was assumed that MPs would not deviate from their scheduled injections and withdrawals by more than the published deviation quantities in each scheduling interval.

As a result, the total deviation payments for 7 February would remain unchanged.

Changes to linepack account

The daily amount added to the linepack account is the negative of the sum of total daily imbalance and deviation payments and is apportioned to each MP in accordance with their share of the total adjusted net quantity of gas withdrawn for the relevant gas day.

Table 8 shows the linepack account on 6 February 2011 would have been reduced by an additional \$11,235 and this amount would be paid to all MPs withdrawing gas on that gas day. The daily linepack account for 7 February would have increased by \$12,229 which would need to be funded by MPs withdrawing gas on that day.

Table 8: Linepack account

	6-Feb-11	7-Feb-11
Change to total deviation payments	\$11,235	\$0
Change to total imbalance payments	\$0	-\$12,229
Change to linepack account	-\$11,235	\$12,229

Total financial impact

The estimated total financial impact (including changes to imbalance, deviation payments and linepack account allocations for both gas days 6 and 7 February 2011) for all MPs would be \$11,187 as reported in Table 1 above.

Appendix B - Detailed analysis of 3 October 2011

Three MPs submitted updated demand forecasts between 10pm and 5am prior to the commencement of the gas day. The updated demand forecasts were higher by 9,551 GJ than the day ahead (D+1) demand forecasts submitted before 10pm. However, the updated demand forecasts were not used in the 6am schedule. For the purpose of the analysis presented below, AEMO was able to generate the expected scheduling results (after the event) using the correct demand forecasts. The expected changes to scheduling and settlement outcomes are discussed below.

Expected changes to gas prices

Table 9 shows the published and expected gas price for each schedule. The gas price for the:

- 6am schedule would not be affected because the increased demand forecasts would be cleared within the same injection bid step;
- 10am schedule would have increased by \$0.12 to \$3.39 due to 1,248 GJ in increased controllable injections to meet the increased demand forecasts. See details in Table 11; and
- other schedules would not be impacted.

Table 9: Market prices

Schedule	6am	10am	2pm	6pm	10pm
Published	\$2.9000	\$3.2700	\$2.2309	\$1.9107	\$1.1100
Expected	\$2.9000	\$3.3900	\$2.2309	\$1.9107	\$1.1100
Change	\$0.0000	\$0.1200	\$0.0000	\$0.0000	\$0.0000

Expected changes to demand forecasts, scheduled controllable injections and controllable withdrawals

The following changes to scheduling outcomes would occur:

- 6am scheduling horizon: an increase in demand forecasts of 9,551 GJ matched by an equal increase in controllable injections; and
- no changes to demand forecasts, scheduled controllable withdrawals and injections for the remaining 4 scheduling horizons.

Table 10 summarises the expected changes in scheduled quantities and demand forecasts for each scheduling horizon.

Table 10: Expected changes to demand forecasts, scheduled controllable injection and withdrawal quantities

Scheduling horizon	6am-6am	10am-6am	2pm-6am	6pm-6am	10pm-6am
Published quantities					
Demand forecast (GJ)	665,477	521,624	415,850	318,056	163,935
Controllable withdrawals (GJ)	42,758	35,632	39,074	34,938	44,751
Controllable injections (GJ)	711,928	618,263	484,747	355,501	232,296
Expected quantities					
Demand forecast (GJ)	675,028	521,624	415,850	318,056	163,935
Controllable withdrawals (GJ)	42,758	35,632	39,074	34,938	44,751
Controllable injections (GJ)	721,479	618,263	484,747	355,501	232,296
Expected changes to quantities					
Demand Forecast (GJ)	9,551	0	0	0	0
Controllable withdrawals (GJ)	0	0	0	0	0
Controllable injections (GJ)	9,551	0	0	0	0

Table 11 shows the breakdown of the changes to demand forecasts, controllable withdrawals and injections for each scheduling interval and summed for each scheduling horizon and schedule.

Table 11: Expected changes to demand forecasts, scheduled controllable injection and withdrawal quantities broken down by scheduling interval

Scheduling interval	6am	10am	2pm	6pm	10pm
Changes to demand forecasts (GJ)					
6am-10am	6,849	0	0	0	0
10am-2pm	1,760	0	0	0	0
2pm-6pm	-317	0	0	0	0
6pm-10pm	740	0	0	0	0
10pm-6am	519	0	0	0	0
Total for scheduling horizon	9,551	0	0	0	0
Total for schedule	9,551	0	0	0	0
Changes to controllable withdrawals (GJ)					
6am-10am	0.2	0.2	0.2	0.2	0.2
10am-2pm	0.1	0.3	0.3	0.3	0.3
2pm-6pm	0.0	0.1	0.0	0.0	0.0
6pm-10pm	-0.1	0.0	0.0	0.0	0.0
10pm-6am	-0.3	-0.4	0.0	0.0	0.0
Total for scheduling horizon	0.0	0.0	0.0	0.0	0.0
Total for schedule	0.0	0.2	0.5	0.5	0.5
Changes to controllable injections (GJ)					
6am-10am	1,248	1,248	1,248	1,248	1,248
10am-2pm	1,661	359	359	359	359
2pm-6pm	1,661	-90	0	0	0
6pm-10pm	1,661	-90	0	0	0
10pm-6am	3,321	-179	0	0	0
Total for scheduling horizon	9,551	0	0	0	0
Total for schedule	9,551	1,248	1,606	1,606	1,606

Changes to imbalance quantities and payments

Table 12 shows the published and expected total market imbalance quantities and payments. The largest changes would occur in the 10am and 2pm schedules:

- 6am schedule: no change to imbalance payments would occur because the imbalance quantity and gas price would not change;
- 10am schedule: the market would have been under-paid by \$5,202 in imbalance payments due to a negative change of -1,248 GJ in imbalance quantity (associated with a small increase (0.2 GJ) in controllable withdrawals and an increase of 1,248 GJ in controllable injections in the 6am-10am scheduling interval. See details in Table 11);

- 2pm schedule: The market would have been under-paid by \$799 in imbalance payments caused by a negative change in imbalance quantity of -358 GJ (associated with 0.3 GJ (=0.5 GJ – 0.2 GJ) increase in controllable withdrawals and 359 GJ (=1,606 GJ – 1,248 GJ) increase in scheduled injections. See details in Table 11);
- no changes to imbalance quantities in other schedules on the gas day; and
- in total, the market would have been underpaid by \$6,001 in daily imbalance payments.

Table 12: Expected changes to imbalance quantities and payments

Schedule	6am	10am	2pm	6pm	10pm
Published imbalance quantities and payments					
Imbalance withdrawal (GJ)	708,235	16,954	11,239	10,033	22,960
Imbalance injections (GJ)	711,928	25,062	-8,940	-8,059	-1,842
Net imbalance quantity (GJ)	-3,693	-8,108	20,179	18,093	24,802
Gas price (\$/GJ)	\$2.9000	\$3.2700	\$2.2309	\$1.9107	\$1.1100
Imbalance payments (\$)	-\$10,710	-\$26,512	\$45,018	\$34,570	\$27,530
Daily imbalance payments (\$)					\$69,896
Expected imbalance quantities and payments					
Imbalance withdrawal (GJ)	717,786	7,403	11,239	10,033	22,960
Imbalance injections (GJ)	721,479	16,758	-8,582	-8,059	-1,842
Net imbalance quantity (GJ)	-3,693	-9,355	19,821	18,093	24,802
Gas price (\$/GJ)	\$2.9000	\$3.3900	\$2.2309	\$1.9107	\$1.1100
Imbalance payments (\$)	-\$10,710	-\$31,714	\$44,219	\$34,570	\$27,530
Daily imbalance payments (\$)					\$63,895
Expected changes to imbalance quantities and payments					
Gas price (\$/GJ)	\$0.0000	\$0.1200	\$0.0000	\$0.0000	\$0.0000
Net Imbalance quantity (GJ)	0	-1,248	-358	0	0
Imbalance payments (\$)	\$0	-\$5,202	-\$799	\$0	\$0
Daily imbalance payments (\$)					-\$6,001

Changes to deviation quantities and payments

MPs' deviation quantities would not have been impacted because:

- There was no impact on deviation payments for the last scheduling interval for gas day 2 October 2011 as the 6am price for gas day 3 October 2011 did not change.
- settlement system uses the correct demand forecasts for the 6am-10am scheduling interval in the 10am schedule to calculate deviation quantities; and
- no change to injection and (controllable) withdrawal deviation quantities would be expected as it was assumed that MPs would not deviate from their scheduled injections and withdrawals by more than the published deviation quantities in each scheduling interval.

As a result, the total deviation payments would remain unchanged.

Changes to linepack account

The daily amount added to the linepack account is the negative of the sum of total daily imbalance and deviation payments and is apportioned to each MP in accordance with their share of the total adjusted net quantity of gas withdrawn for the relevant gas day.

Table 13 shows the linepack account would have increased by \$6,197 which would need to be funded by all MPs withdrawing gas on that day.

Table 13: Linepack account

	3-Oct-11
Change to total deviation payments	-\$196
Change to total imbalance payments	-\$6,001
Change to linepack account	\$6,197

Total financial impact

The estimated total financial impact (including changes to imbalance, deviation payments and linepack account allocations) for all MPs would be \$3,870 as reported in Table 1 above.