

Australian Energy Market Operator

Self-reported breach by ATCO Gas Australia

Apparent breach of WA Retail Market Procedures clause 152 and 229, by ATCO Gas Australia, on 08/07/2017

Overview:

On 08/07/2017, ATCO Gas Australia (ATCO) did not provide the gate point metering data (GPMD) and the estimate of unaccounted for gas (UAFG) for gas day 07/07/2017 to AEMO by 11.30am WST. This was caused by:

- failure in ATCO's email systems not receiving and processing inbound pipeline operator metering data; and
- data management system not processing and transmitting the GPMD and UAFG files when due.

As a result, the delivery of the GPMD and UAFG files to AEMO was delayed. ATCO sent the GPMD and UAFG files for gas day 07/07/2017 to AEMO at 10.30am WST on 09/07/2017.

This appears to be a breach of clause 152 and 229 of the WA Retail Market Procedures ("Procedures") by ATCO.

Clause 152 and 229 of the Procedures read as follows:

152. Network operator to provide gate point metering data to AEMO for each gate point

- (1) the network operator must:
 - (a) subject to clause 152(4) aggregate the physical gate point metering data provided under clause 151(1), for each of the relevant gas days and for each hour in each of the relevant gas days, in each case across all physical gate points associated with the sub-network (the aggregated hourly and daily data being the "gate point metering data"); and
 - (b) provide to AEMO as soon as reasonably practicable after receiving the physical gate point metering data from the pipeline operator under clause 151(1), but in any event, no later than 3.5 hours after the end of the gas day the gate point metering data.
- (2) If the network operator receives amended physical gate point metering data under clause 151(3) at any time (including if the data is refined or verified), the network operator must as soon as reasonably practicable:
 - (a) aggregate the amended physical gate point metering data for each of the gas days for which amended physical gate point metering data was provided in accordance with clause 152(1)(a); and
 - (b) provide to AEMO the amended gate point metering data determined under clause 152(2)(a).
- (3) If for any reason (including the operation of clause 151(4) the network operator does not receive the physical gate point metering data within the time specified in clause 151(1), then the network operator must:

- (a) as a reasonable and prudent person, estimate the gate point metering data, for the gas day and each hour in the gas day, for each gate point;
 - (b) provide the estimate to AEMO within 3.5 hours after the end of the gas day.
- (4) If the network operator receives physical gate point metering data aggregated across a period of more than one gas day, then the network operator must, as a reasonable and prudent person, apportion the physical gate point metering data across each gas day in the period for which the physical gate point metering data was provided.

229. Estimate of unaccounted for gas

- (1) For each sub-network for each gas day, within 3.5 hours after the end of the gas day, the network operator must advise AEMO of its estimate of UAFG (which may later be revised under clause 223(2)) ("EUAFG"), the name of each user who is a supplier of UAFG for the sub-network and the quantity of the UAFG estimated to be supplied by each supplier.
- (2) The amount of UAFG supplied on a gas day by a user which was notified under clause 229(1) is the user's UAFG ("UUAFG") for the gas day.
- (3) The network operator's estimate of UAFG under clause 229(1) must:
 - (a) take into account historical levels of UAFG; and
 - (b) be a number that results in the net system load calculated by AEMO under clause 223(1) being zero or a positive number.

Impact:

Due to missing GPMD and UAFG data for gas day 07/07/2017, AEMO used estimates to balance and reconcile calculations for gas day 07/07/2017 on 08/07/2017. Upon investigation, it has shown no significant volume differences and Swing Service amounts.

Resolution:

ATCO investigation identified the following:

- The email issue was caused by a third party service and the issue is now resolved.
- The failure of the data management system was due to a fault in the auto transmission module in the system. ATCO has updated their data operator manual to include further manual cross checking and verification steps.

Proposed Further Actions:

ATCO has identified the following action:

- To initiate a process for the service provider's support team to communicate to ATCO when changes are being planned so ATCO can determine the required changes at their end.
- To implement plans to fix the fault in the auto transmission module in the data management system.

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 WA Retail Market Procedures.

Submissions are requested by no later than 5:00pm (AEST) **Thursday 21 September, 2017**. Submissions should be sent by e-mail to rmo@aemo.com.au.

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

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AEMO
GPO Box 2008
Melbourne
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If you have any questions regarding this matter, please contact Carol Poon on (03) 9609 8509.

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