



STTM Event Report

December 2020

Unconfirmed facility capacity information

Prepared by Gas Market Monitoring

Important notice

PURPOSE

AEMO has prepared this report pursuant to Section 7.6 of the STTM Procedures, and Version 55 of the National Gas Rules (NGR), unless otherwise specified.

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1. Summary

On 30 October 2020, APA Group (APA) submitted a day-ahead capacity for Roma Brisbane Pipeline (RBP) facility of 114,000 GJ, which was below the low capacity threshold¹ of 152,000 GJ. This triggered a warning, which was not confirmed by APA resulting in a one-and-a-half hour extended window for APA to resubmit, or confirm, this data. No updated capacity submission, or confirmation, was received in the extended window and the capacity of 114,000 GJ was used for gas day 31 October 2020.

This report is published in accordance with section 7.6 of the STTM Procedures. All times used in this report are AEST.

2. Assessment of event

Clause 414(1) of the NGR requires STTM facility operators to submit facility hub capacity information each day by 9.00 hrs. The submission contains the capacity for the next three gas days. Where this information is not provided for the following gas day, the facility operator has an additional one-and-a-half hours to submit the information. The STTM Procedures also allow for warnings if the submitted capacity is outside a low and high range for that facility. The warning needs to be confirmed before the cut-off time.

In the absence of APA confirming its submission for RBP, AEMO notified the market and used this value for the facility hub capacity information.

APA have confirmed to AEMO that the correct capacity submission for Gas Day 31 October 2020 was indeed 114,000 GJ due to maintenance works on the RBP. Since AEMO has raised the issue, APA has undertaken a review of its processes and is considering changes necessary to address this issue into the future. There was no impact on APA operations and all nominations and allocations were less than the 114,000 GJ operating capacity on 31 October 2020. There was no impact to the market as a result of this event.

The following table sets out the relevant rules and procedures for this process as there is a lack of clarity with respect to whether the systems and processes are adequately aligned.

Table 1 Assessment of event

Document	Relevant section	Description	Assessment
National Gas Rules	414(2A) Capacity information	AEMO must, in accordance with the STTM Procedures validate facility hub capacity information, and if the information fails validations AEMO will use substitute information.	A warning message was issued to APA due to the submission being below the low capacity threshold. Substitute information was not used.

¹ The high and low capacity thresholds are set by the facility operator and are used to verify data quality

Document	Relevant section	Description	Assessment
STTM Procedures	7.1.3A Validation of capacity information	AEMO must validate information in accordance with the STTM Interface Protocol ²	The AEMO system has accepted the submission and provided a warning message to APA.
Participant Build Pack Business Validations Addendum	2.6 Facility Hub Capacity	If a submission is outside of the low validation levels but greater than or equal to zero the submission can be confirmed by the STTM facility operator. If a submission has not been received by the ex ante cut-off or a submission has not been confirmed by this time, then the submission window is extended for a maximum of one-and-a-half hours or until a valid submission is received or a submission is confirmed.	Even though a warning message has been sent, the AEMO systems have accepted and used the submission – indicating that the warning is a soft validation. The ambiguity with this clause is that it does not contemplate if a valid submission is not received or confirmed within the window.
Participant Build Pack Business Validations Addendum	2.6 Facility Hub Capacity	If the Facility Hub Capacity data fails the validation test, a rejection notice is issued, and the facility operator must resubmit.	The data has not been rejected, indicating that the warning message is not considered a failed validation and therefore there is no requirement for a report as per 7.6(a) of the STTM Procedures ³ . That is, there is a differentiation between a validation test and the notification of a warning message where the information is outside the low or high threshold.
Participant Build Pack Business Validations Addendum	Table 21 Validations	One of the validations is specified as capacity being lower than the low capacity threshold.	It appears that this document should be further clarified as to whether this validation should result in the submitted number not being used.
Participant Build Pack Business Validations Addendum	2.11 Data Confirmation	The STTM Facility Operator provides Confirmation Data to AEMO.	In this case confirmation data was not provided to AEMO.
STTM Procedures	7.6 Reporting on validation and substitution of data	AEMO must prepare a report if facility hub capacity information is not provided or fails validation.	It appears that a capacity submission with a value outside of the high or low threshold is not considered a failed validation as it does not get rejected. The AEMO systems request a confirmation of the data but in the absence of the data being confirmed, the submitted information will be utilised.

In the case that the warning message is not a failed validation, there is no requirement for this report to be written even though the lack of a confirmation can result in an extended window to submit, or confirm, data. AEMO has written this report for consistency with previously published reports where a failure to confirm has been treated as a trigger for the report.

² The STTM Interface Protocol consists of the Participant Build Pack, the Participant Build Pack Business Validations Addendum and the STTM Reports Specification

³ Clause 7.6(a) of the NGR requires AEMO to prepare a report if information to be provided in accordance with rule 414, on a gas day for the following gas day is not provided or fails validation.

3. Conclusion

There was no impact to market outcomes as a result of these events. AEMO's processes and procedures appeared to operate as intended, noting that mechanisms are in place to mitigate the market impact in the event of a late, or invalid, submission for both facility allocations and facility hub capacity. The market was notified of the event and the reason for the extended window.

There is some ambiguity in the STTM Interface Protocol and AEMO will raise this at an upcoming Gas Wholesale Consultative Forum to address the necessary clarifications required in the document.

A1. Chronology

Time	Event / Action
6.42 hrs	APA submits facility hub capacity and receives a warning message. The information is not confirmed.
9.00 hrs	AEMO issues a market notice to participants indicating facility hub capacity quantity for the RBP facility was below the low capacity threshold for gas day 31 Oct 2020. The window for submitting the data is extended for one-and-a-half hours.
10.30 hrs	No further confirmation or submission is received from APA and AEMO issues a market notice indicating facility hub capacity quantity for the RBP facility was below the low capacity threshold for gas day 31 Oct 2020.