

## **Notice to Participants of AEMO's decision to update BB Procedures to version 9.0 and BB Data Submission Procedures to version 2.0**

This Notice advises all Registered Participants (Participants) and other interested stakeholders that consultation on changes to the BB Procedures and BB Data Submission Procedures, prescribed in rule 135EE of the National Gas Rules (NGR), concluded on 5 November 2018.

Taking into account the assessment provided in the Impact and Implementation Report (IIR) *IIR 18-002 Amendments to BB Procedures and BB Data Submission Procedures*, and comments received on the proposed procedures, AEMO has decided to make amendments to the BB Procedures and BB Data Submission Procedures as shown in the change marked versions available <http://aemo.com.au/Stakeholder-Consultation/Consultations/Amendments-to-BB-Procedures-and-BB-Data-Submission-Procedures?Convenor=AEMO%20Gas>.

The changes to the BB Procedures and BB Data Submission Procedures are summarised as follows:

- Allow for registration of allocation agents and allocation points for all transportation facilities;
- Specify the requirements for information to be provided to AEMO regarding the allocation methodology and other aspects of the allocation agreements in place at each allocation point on specified facilities;
- Specify the requirements for the reporting the nameplate rating for each receipt point and delivery point on each BB transmission pipeline;
- Specify the secondary capacity transaction information to be published by AEMO on the GBB;
- Specify the requirements for transitional compression facilities to report information as per the Capacity Transfer and Auction Procedures; and
- Specify the information AEMO will publish on the Bulletin Board relating to these items.

AEMO received two submissions in response to the IIR commenting on the changes. These are summarised in Appendix A. AEMO also received informal feedback from a number of stakeholders and has taken this into consideration.

The changes made in the BB Procedures and the BB Data Submission Procedures are substantially the same as those proposed in the Impact and Implementation Report (IIR), with the following amendments based on feedback received in the consultation and corrections:

- BB Procedures
  - The allocation methodology for all BB Allocation Points, and other supporting information, will now be required to be provided by the BB Allocation Agent by the later of 1 February 2019 or with registration. The registration timeframes are stipulated in the National Gas Rules.
  - The nameplate rating for all connection points will also be required by 1 February 2019.
- BB Data Submission Procedures
  - Reporting requirements in the BB Data Submission Procedures for transitional compression facilities clarified.

- Added the Secondary Capacity Data Transaction report to the BB Data Submission Procedures (from the Capacity Transfer Interface Protocol where it was originally consulted on).

AEMO considers that the changes meet the requirements of the National Gas Objective by giving effect to the transparency measures that will facilitate trade through the pipeline capacity trading reform package.

The IIR and participant feedback from the consultation process are available on the AEMO website at -

<http://aemo.com.au/Stakeholder-Consultation/Consultations/Amendments-to-BB-Procedures-and-BB-Data-Submission-Procedures?Convenor=AEMO%20Gas>.

As required by Rule 135EE(5), AEMO notifies Participants that version 9.0 of the BB Procedures and version 2.0 of the BB Data Submission Procedures will be effective 15 business days from the date of this notice. Please note that applications by BB allocation agents to register as the BB reporting entity for BB allocation points may be submitted to AEMO from the date of this notice.

**Notice Date: 23 November 2018**

## Appendix A: Summary of stakeholder comments on the proposed changes to the BB Procedures and BB Data Submission Procedures

Organisation	Summary of comment	AEMO's Response
Jemena	Difficult to fully comment given the publication of the National Gas Rules has not yet been made public.	Noted.
Jemena	Section 7.2A (f) requires the name, phone and email details of a person with regard to allocation agreements. A shared email and phone number that directs shippers to those that can assist within a dedicated customer service team is preferred.	The requirement for a telephone number and email of the contact person is prescribed by the Rules, however AEMO has adjusted the Procedures so that the individual's email and phone number do not have to be given, instead shared email or telephone number at which that person can be contacted can be provided.
Jemena	Section 9.1.1 (xviii) refers to the publication of the details of secondary capacity transactions, however there are not corresponding text in sections 7 or 8 requiring the parties to provide this information to AEMO.	The obligations to provide this information is in the NGR, and , AEMO's approach is not to duplicate this information in the Procedures. Note, the transactions relating to this information is now available in the BB Data Submission Procedures (previously consulted on as part of the Capacity Transfer Interface Protocol).
Lochard	Iona Underground Gas Storage (IUGS) is an existing BB Storage Facility. This includes the compressors that perform storage injection and withdrawal functions in connection with the interconnecting pipelines. Under the new legal and regulatory framework these same compressors will also be categorised as BB Compression Service Facility.	These compressors will be categorised as transitional compression facilities having been registered under Part 24, and subject to similar reporting obligations for publication on the Gas Bulletin Board.
Lochard	<p>The reporting and data requirements for the BB Storage Facility and BB Compression Service Facility are mostly the same for Lochard.</p> <p>Similarly concerned there is duplication in the role of BB allocation agent, allocation points, and methodology.</p>	<p>The information to be provided for transitional compression facilities is associated with the amount of gas that has been compressed or can be compressed by the facility.</p> <p>Note, registration of BB allocation agents and their obligation to provide allocation methodologies for each allocation point is a new category of registration and new data to be provided under the NGR.</p>

<p>Lochard</p>	<p>Lochard is concerned the replication of data published under the BB Storage facility for the BB Compression Service Facility creates unnecessary costs for system and administration. Lochard enquires where simplification can be incorporated in the procedures and systems to cater for overlapping facility roles.</p>	<p>AEMO is unable to grant reporting exemptions between transitional compression service facilities and BB facilities given the structure of the legal framework.</p>
<p>Lochard</p>	<p>Lochard proposes that AEMO host stakeholder session in the change process that enables better understanding and application of rule and procedures to a specific facility.</p>	<p>AEMO established a reference group and facility operator working group in 2018 which has met regularly throughout the implementation project. AEMO intends to continue to convene these groups up until market start.</p> <p>AEMO encourages stakeholders to contact the pipeline capacity trading project team at <a href="mailto:pct@aemo.com.au">pct@aemo.com.au</a> with any specific questions or feedback.</p>