

# GAS DAY HARMONISATION TRANSITION PLAN

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## 1. INTRODUCTION

The COAG Energy Council has approved harmonising gas days, with the Gas Market Reform Group (GMRG) progressing implementation of changes to the National Gas Law (NGL) and the National Gas Rules (NGR) (the rules).

Under the changes, gas day harmonisation means a common gas day start time of 6 am (AEST) across the east coast (and the NT once it becomes connected to the east coast) to apply to the operators of all production, pipeline, compression and storage facilities and the facilitated markets (e.g. the GSH, STTM and retail markets)

Different gas markets across the east coast currently operate with different gas day start times because of legacy pipeline arrangements. These differences impose a cost on the increasingly integrated system. A standard market timetable across all natural gas facilities is expected to support new market arrangements proposed by the Australian Energy Market Commission (AEMC's) East Coast Wholesale Gas Markets and Pipeline Frameworks Review and accepted by the COAG Energy Council in August 2016.

The Gas Market Reform Group (GMRG) has subsequently worked with AEMO, the AEMC, the AER and industry to develop the legislative package to implement these changes. The COAG Energy Council has accepted the recommendations and approved the legislative package in July 2018.

The NGR changes have been made by the South Australian Minister and the NGL changes were enacted by the South Australian Parliament on 22 November 2018.

According to Schedule 5, Part 6, Rule 3 of the amended rule, AEMO is required to publish information on the arrangements it will implement for transitioning to the standard gas day in each of the facilitated markets by 1 April 2019.

As part of the transition process, AEMO will need to amend Wholesale and Retail Market Procedures affected by the change to standard gas days. Market systems must have implemented the use of the new harmonised gas day from 1 October 2019.

This document provides a register of all Wholesale Market Procedures and Retail Market Procedures (RMP) that are affected by the change to a standard gas day as well as identifying the impacted entity. The objective of this plan is to enable a smooth transition to 1 October 2019.

In addition to legislative obligations to implement the standard market timetable, AEMO has been requested by the Chair of the COAG Energy Council to coordinate industry readiness. This will mean AEMO is required to coordinate the industry readiness program on behalf of industry participants to inform requirements as well as identify and assist with the resolution of issues associated with the transition.

### 1.1. Purpose

This document describes the activities that AEMO and Market Participants are required to perform to facilitate successful and smooth transition to the harmonised gas day.

### 1.2. Intended audience

This document is intended for all AEMO and industry gas market stakeholders.

### 1.3. Transition Plan In-Scope

Market transition arrangements for gas markets are required for the following AEMO departments:

- (a) Settlements
- (b) Prudentials

- (c) Retail Gas Markets (NSW/ACT, QLD and SA)
- (d) Wholesale Gas Markets
- (e) Gas Real Time Operations (RTO)
- (f) Gas Market Monitoring (GMM)

#### 1.4. Transition Plan Out of Scope

The following items have been identified as out of scope for the Transition Plan:

- (a) Victorian Declared Wholesale Gas Market
  - (i) Standard gas day already applies
- (b) Retail market in Victoria
  - (i) standard gas day already applies
- (c) Northern Territory retail market
  - (i) Not a gas market

Note that Part 26 facilities in the Northern Territory will need to implement the standard gas day as per (e)(i) below.

- (d) Capacity Trading artefacts (which already cater for the standard market timetable)
  - (i) Gas Supply Hub – Capacity Transfer and Auction Procedures
  - (ii) Capacity Auction – Auction Agreement
- (e) Transition plans for Natural Gas Facilities (due by 30 June 2019), including:
  - (i) Natural gas facilities (other than in Western Australia)
  - (ii) Short Term Trading Market facilities
  - (iii) Distribution and transmission pipelines connected to retail markets
  - (iv) Production, storage and interconnected pipeline facilities connected to Declared Wholesale Gas Market (DWGM)

#### 1.5. Transition Plan Consultation Timeline

The following timeline follows a standard consultation in accordance with Part 3, Division 2 and Rule 8 of the NGR.

Activity	Start	End	Comments/Regulatory
Publish first draft Transition Plan for consultation		13 Dec 2018	NGR Rule 8(2)(a)
Submissions on first consultation	13 Dec 2018	16 Jan 2019	NGR Rule 8(2)(a)(ii)
Prepare summary of submissions and update Transition Plan	17 Jan 2019	11 Feb 2019	
Publish second draft Transition Plan Consultation		12 Feb 2019	NGR Rule 8(2)(d)(iii)

Activity	Start	End	Comments/Regulatory
Submissions on second consultation	13 Feb 2019	6 Mar 2019	NGR Rule 8(2)(d)
Prepare summary of submissions and final Transition Plan	7 Mar 2019	29 Mar 2019	
Publish final Transition Plan		1 Apr 2019	NGR Sch 11 (Transitional) Sch 5 (PCT) Part 6 (Std Mkt Timetable) 3(3)

## 1.6. General Principles for Transition

AEMO has based the gas market arrangements for transition to the gas day harmonisation market timetable on the following general principles and recommends that all facility operators that must transition to the standard gas day use the same principles.

	Principle	Include as transitional in RMP	Include as transitional in STTM Procedures	Include as transitional in Exchange Agreement for GSH
1.	All events for a facility or regulated market that take place before 6am 1 Oct 2019 AEST will be based on the gas day that is current at that time for that facility or regulated market.	No	No	No
2.	All events for a facility or regulated market that take place on or after 6am 1 Oct 2019 AEST will be based on the standard gas day.	No	No	No
3.	Gas day 30 Sep 2019 will be shorter than usual: a) SA and NSW/ACT 23.5 hours b) Qld 22 hours	Yes	Possible	Possible
4.	All interval metering data from data provider to regulated markets and users will reflect consumption over the relevant gas day ie: a) Current gas day up to and including 29 September 2019 b) Shorter gas day on 30 September 2019 c) Standard gas day from 1 October 2019	Yes	NA New NGR 369A requires measurement using standard gas day	NA

	Principle	Include as transitional in RMP	Include as transitional in STTM Procedures	Include as transitional in Exchange Agreement for GSH
5.	<p>All metering changes need to be in place by 1 October 2019. This means facility operator Transition Plans will need to accommodate meters which:</p> <ul style="list-style-type: none"> <li>a) Have not yet converted to measurement of standard gas days</li> <li>b) Have converted to measurement of standard gas day, but which need to continue to report data for the relevant gas day</li> <li>c) Must accommodate a shorter gas day on 30 September 2019</li> <li>d) Must report data for the standard gas day from 1 October 2019</li> </ul>	Yes	NA	NA
5A	<p>Where hourly metering data is provided in South Australia, the last hourly interval for gas day 30 September 2019 will include data for the period from 5:30am to 6:00am AEST on 1 October 2019.</p> <p>No hourly metering data is provided to markets in Queensland or NSW/ACT.</p>	Yes	No	No
6.	<p>Transition plans will include regular reporting of the scheduling and completion of meter conversion.</p> <ul style="list-style-type: none"> <li>a) Schedule conversion for the daily read meters as close as possible to transition date</li> <li>b) Reporting of scheduling and completion of meter conversion should identify the meters by MIRN only</li> <li>c) Transition plans should also include method of completion of meter conversion (e.g. Service Orders to be sent, impacts on meter data files)</li> <li>d) Updates should be made at least weekly</li> <li>e) Transition plans should include details of any contingency plans to substitute metering data being measured in non-harmonised gas days with estimates for a standard gas day after 1 October 2019.</li> </ul>	Yes	Potentially	NA

	Principle	Include as transitional in RMP	Include as transitional in STTM Procedures	Include as transitional in Exchange Agreement for GSH
7.	<p>There will be no change to basic meter reading schedules and routes.</p> <p>a) Basic meter readings are assumed to be at the start of the gas day on which an actual meter reading is obtained</p>	No	NA	NA
8.	<p>Changes to gas days have a negligible impact on Effective Degree Days and meter estimation processes.</p> <p>a) Estimates mostly replaced by actuals</p>	No	NA	NA
9.	<p>Facility operators will manage the impact on Heating Value and Zonal Heating Value determination (if any)</p>	No	NA	NA
10.	<p>All timings that are an offset from a gas day will retain the same offset (e.g. 4.5 hours after the start of a gas day)</p>	No	No	No
11.	<p>The context of specific timings should determine if they are related to a gas day or not:</p> <p>a) Change all timings that are related to the gas day through context (eg data for the previous gas day that is provided by 11am on the next gas day in the NSW/ACT Retail Market Procedures is a 4.5 hour offset from the start of the next gas day)</p> <p>b) No changes to timings that are unrelated to the gas day (eg STTM market schedule variations must be submitted and confirmed by no later than 5pm AEST on seventh day).</p> <p>c) Some timings may be related to the gas day, but not change (eg STTM Contingency gas bids and offers for the following gas day must be submitted by 6pm AEST)</p>	No	No	No
12.	<p>Part 26 facility operators must include the impact (if any) on MHQ/MDQ in their transition plans.</p>			

## 1.7. References

[Gas rules made by the South Australian Minister](#)



## 2. INDUSTRY READINESS AND COORDINATION

Industry readiness and coordination will involve the following activities,

- (a) Defining approach after transition plans published
- (b) Readiness Reporting in lead up to the transition (self-reporting by natural gas facility operators, consolidated by AEMO)
- (c) Industry cutover plan developed and published by end of August 2019, and updated as required
- (d) Coordination of change

A separate document will be created for industry readiness and coordination.

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### 3. SETTLEMENTS AND PRUDENTIALS

Most Settlements and Prudential activities for STTM and GSH market are not impacted by Gas Day Harmonisation, except for some daily activities as highlighted in the table below.

Market Process – STTM	When (AEST)	Who	GDH (new timing, AEST)
Daily Estimates			
Submit daily CTM data (Brisbane only)	By 12.30 pm	Pipeline Operator	By 10.30AM
Submit STTM daily deemed distribution system allocation (Brisbane only)	By 12.30 pm	Pipeline Operator	By 10.30AM
Submit STTM daily distribution system allocation	SYD/ADL - By 11 am BRI - By 12.30 am	AEMO (as Retail Market Operator)	By 10.30AM
Issue deviation estimates	SYD/ADL - By 12.08 pm BRI - By 1.38 pm	AEMO	By 10.38AM
Issue prudential monitoring information for all hubs	After 2 pm	AEMO	After 12PM
Preliminary Settlement for all hubs			
Submit STTM facility allocations for Preliminary settlement run	By 3 <sup>rd</sup> business day after the end of the billing period	Allocation Agents (for Pipeline Operators)	No change
Submit MOS price step allocations for Preliminary settlement run	By 3 <sup>rd</sup> business day after the end of the billing period	Allocation Agents (for Pipeline Operators)	No change
Submit CTM data (Brisbane only) for Preliminary settlement run	By 4 <sup>th</sup> business day after the end of the billing period	Pipeline Operator	No change
Submit STTM deemed distribution system allocations (Brisbane only) for Preliminary settlement run	By 4 <sup>th</sup> business day after the end of the billing period	Pipeline Operator	No change
Submit STTM distribution system allocation for Preliminary settlement run	By 4 <sup>th</sup> business day after the end of the billing period	AEMO (as Retail Market Operator)	No change
Issue preliminary settlement statements	By 7 <sup>th</sup> business day after the end of the billing period	AEMO	No change
Final Settlement for all hubs			
Submit STTM facility allocations for Final settlement run	By 14 <sup>th</sup> business day after the end of the billing period	Allocation Agents (for Pipeline Operators)	No change

Market Process – STTM	When (AEST)	Who	GDH (new timing, AEST)
Submit MOS price step allocations for Final settlement run	By 14th business day after the end of the billing period	Allocation Agents (for Pipeline Operators)	No change
Submit CTM data (Brisbane only) for Preliminary settlement run	By 15th business day after the end of the billing period	Pipeline Operator	No change
Submit STTM deemed distribution system allocations (Brisbane only) for Final settlement run	By 15th business day after the end of the billing period	Pipeline Operator	No change
Submit STTM distribution system allocation for Final settlement run	By 15th business day after the end of the billing period	AEMO (as Retail Market Operator)	No change
Issue final settlement statements / invoices	By 18th business day after the end of the billing period	AEMO	No change
Payment Date for all hubs			
Make payment to AEMO	By 12 noon on the 20th business day after the end of the billing period	Trading Participants	No change
AEMO makes payment to Market Participants	By 2pm on the 20th business day after the end of the billing period	AEMO	No change
Revision Settlement for all hubs			
Submit STTM facility allocations for Revision settlement run	By 1st business day after the end of the 9th billing period	Allocation Agents (for Pipeline Operators)	No change
Submit MOS price step allocations for Revision settlement run	By 1st business day after the end of the 9th billing period	Allocation Agents (for Pipeline Operators)	No change
Submit CTM data (Brisbane only) for Revision settlement run	By 2nd business day after the end of the billing period	Pipeline Operator	No change
Submit STTM deemed distribution system allocations (Brisbane only) for Revision settlement run	By 2nd business day after the end of the billing period	Pipeline Operator	No change
Submit STTM distribution system allocation for Revision settlement run	By 2nd business day after the end of the billing period	AEMO (as Retail Market Operator)	No change

Market Process – STTM	When (AEST)	Who	GDH (new timing, AEST)
Issue settlement revision	On the 5th business day after the end of the 9th billing period	AEMO	No change

Market Process – Gas Supply Hub	When (current)	Who	GDH (new)
Daily settlement			
Determine the Actual Delivered Quantity based on data provided by the relevant pipeline operator or gas producer	From the end of the delivery gas day	Participants	No change
Provide AEMO with actual gas delivery information	From the end of the delivery gas day	Participants	No change
Prepare estimate of settlement amounts	Each business day	AEMO	No change
Report settlement amount and quantities to participants via market report	Each business day	AEMO	No change
Monthly Settlement			
Provide AEMO with actual gas delivery information	By 9 am on the 14th business day after the end of the billing period	Participants	No change
Submit and confirm Reallocation requests	By 9 am on the 14th business day after the end of the billing period	Participants	No change
Issue Final Settlement Statement	By 15th business day after the end of the billing period	AEMO	No change
Payment Date			
Make payment to AEMO	By 12 noon on the 20th business day after the end of the billing period	Trading Participants	No change
AEMO makes payment to Market Participants	By 2 pm on the 20th business day after the end of the billing period	AEMO	No change
Revision Settlement			

Market Process – Gas Supply Hub	When (current)	Who	GDH (new)
Provide AEMO with updated information for a revised statement	By 9 am on the 1st business day of the 4th billing period after the settled billing period	Participants	No change
Issue a Revised Settlement Statement	By 2nd business day of the 4th billing period after the settled billing period	AEMO	No change

The transitional activities for Settlements and Prudentials are as follows:

Activity 3.1.
Internal System Scheduler Application
Responsibility: AEMO IT
Change timing for internal scheduled batch jobs (SABS) related to Settlements and Prudentials

## 4. RETAIL GAS MARKETS

According to Schedule 5, Part 6, Rule 3 of the amended rule, the impacted retail regulated gas markets are Queensland (QLD), South Australia (SA) and New South Wales/ Australian Capital Territory (NSW/ACT)

From a Retail Market perspective, the main business processes that will be impacted by the Gas Day Harmonisation is the provision of interval metering information and consultation process for the transitional Retail Market Procedures (RMP) to provide the regulatory relief for the shorter gas day on 30 September 2019. Specifically, they involve the following:

- (a) Two stage effort required by market participant to configure interval meter information for,
  - (i) Transitional shorter gas day on 30 September 2019 to align with transitional RMP
  - (ii) Standard gas day from 1 October 2019 to align with RMP based on new NGR
- (b) AEMO will develop the transitional RMP to provide regulatory relief to the Participants for the shorter gas day on 30 September 2019. The details of shorter gas day in each of the impacted market is as follows:
  - (i) For QLD the gas day will be defined as a period of 22 consecutive hours beginning at 8:00 am AEST
  - (ii) For NSW/ACT the gas day will be defined as a period of 23.5 consecutive hours beginning at 6:30 am AEST
  - (iii) For SA the gas day will be defined as a 23.5 hour period starting at 6:00 am ACST (6:30am AEST) on 30 September 2019 and ending at 5:30am ACST (6:00am AEST) on the following day

A Proposed Procedure Change (PPC) containing the transitional RMP changes will be published by early April 2019 with a Notice of Decision (NoD) published by end of June 2019.

No change to the business processes pertaining to the following:

- (a) Transfers
- (b) Service Orders
- (c) MIRN Discovery
- (d) Update Site Access Information
- (e) Route Site Information
- (f) Retail of Last Resort (RoLR)
- (g) Updating Customer Details
- (h) Network Billing
- (i) Provision of Basic Metering Information
- (j) Provision of interval metering data of all types (eg distribution interval meters, gate stations, custody transfer points as relevant)

Activity 4.1.

Configure Internal Meter Information for Transitional Gas Day  
Responsibility: Market Participant and Part 26 Facility Operator

Configure interval meter information for transitional gas day on 30 September 2019

Activity 4.2.

Configure Internal Meter Information for Standard Gas Day  
Responsibility: Market Participant and Part 26 Facility Operator

Configure interval meter information for standard gas day on 1 October 2019

Activity 4.3.

Develop Transitional RMP to Provide Regulatory Relief  
Responsibility: AEMO

Develop transitional RMP to provide regulatory relief for NSW/ACT

Activity 4.4.

Develop Transitional RMP to Provide Regulatory Relief  
Responsibility: AEMO

Develop transitional RMP to provide regulatory relief for QLD

Activity 4.5.

Develop Transitional RMP to Provide Regulatory Relief  
Responsibility: AEMO

Develop transitional RMP to provide regulatory relief for SA

Activity 4.6.

Determine and Submit Daily Distribution System Allocation  
Responsibility: AEMO

Determine and submit daily distribution system allocation to the STTM system no later than 4.5 hours after the start of the gas day in accordance with NGR 422 (for NSW/ACT, QLD and SA)

Activity 4.7.

Provision of Energy Data to AEMO (NSW/ACT)  
Responsibility: Network Operator

To provide daily metering data to AEMO no later than 3 hours after the start of the gas day in accordance with NSW/ACT RMP

**Activity 4.8.**

Provision of Energy Data to AEMO (QLD)

Responsibility: Distributor

To provide daily metering data to AEMO no later than 3.5 hours after the start of the gas day in accordance with QLD RMP

**Activity 4.9.**

Pipeline Operators to Provide Physical Gate Point Metering Data (SA)

Responsibility: Pipeline Operator

To provide physical gate point metering data to the Network Operator no later than 2.5 hours after the end of the gas day in accordance with SA RMP

**Activity 4.10.**

Network Operator and Pipeline Operator to Provide Gate Point Metering Data to AEMO for Each Gate Point (SA)

Responsibility: Network Operator and Pipeline Operator

To provide physical gate point metering data to AEMO no later than 3.5 hours after the end of the gas day in accordance with SA RMP

**Activity 4.11.**

Network Operator to Provide Metering Data to AEMO for Each Interval-Metered Delivery Point (SA)

Responsibility: Network Operator

To provide interval metering data to AEMO no later than 3.5 hours after the end of the gas day in accordance with SA RMP



## 5. WHOLESALE GAS MARKETS

The transition activities for the wholesale gas market are as follows.

### Activity 5.1.

Update GSH Exchange Agreement

Responsibility: AEMO

Update GSH Exchange Agreement to cover for short gas day on 30 September 2019 and standard gas day from 1 October 2019.

### Activity 5.2.

MIBB user guide and STTM reports specification

Responsibility: AEMO

Update report timings to reflect changes required for standard gas day.

### Activity 5.3.

Update STTM guides and training material

Responsibility: AEMO

Update training material, Industry Guide to STTM, Technical Guide to STTM and Overview of the STTM.

## 6. GAS REAL TIME OPERATIONS / GAS MARKET MONITORING (GMM)

The market processes listed below are in addition to the Settlement and Prudential timelines changes, outlined in Section Error! Reference source not found.. Daily STTM facility allocations (pipeline allocations and MOS step allocations), bid/off submissions and schedule publication times will be updated:

Most of GMM activities are not impacted by Gas Day Harmonisation.

Wholesale gas market transition activities also involve amending some of the impacted documents and guides owned by GMM.

Market Process – STTM	When (AEST)	Who	GDH (new timing, AEST)
Submit STTM daily facility allocations (PAD)	SYD/ADL - By 11:00 BRI - By 12.30	Allocation Agents (for Pipeline Operators)	By 10.30
Submit STTM daily MOS price step allocations (MSD)	SYD/ADL - By 11:00 BRI - By 12.30	Allocation Agents (for Pipeline Operators)	By 10.30
Publication of Ex-post schedule	SYD/ADL - By 12:00 BRI - By 13.30	AEMO	By 11:30
Submit Ex-ante bid/offer	SYD/ADL - By 12:00 BRI - By 13:30	Trading Participants	By 11:30
Publication of Ex-ante schedule	SYD/ADL - By 13:00 BRI - By 14:30	AEMO	By 12:30
Submit Provisional (D-2, D-3) bid/offers	SYD/ADL - By 14:00 BRI - By 15:30	Trading Participants	By 13:30
Publication of Provisional schedule	SYD/ADL - By 15:00 BRI - By 16:30	AEMO	By 14:30
Publication of delayed Ex-post (PPOST)	SYD/ADL - By 16:00 BRI - By 17:30	AEMO	By 15:30
Submit Contingency Gas bids/offers	SYD/ADL - By 18:00 BRI - By 18:00	Trading Participants	No change

### Activity 6.1.

Update Longford meter accreditations (DWGM) (This activity is not required)

Responsibility: Market Participants

Ensure meter accreditations at Longford 30000001PC are updated to reflect day light savings flag to 'N', 3 gas days before 1 October 2019

**Activity 6.2.**

Publishing of STTM Schedules

Responsibility: AEMO

Ensure Ex-post (by 11:30), Ex-ante (by 12:30), Provisional (by 14:30) and Provisional ex-post (PPOST by 15:30) schedules are published as per times required by NGR for all hubs.

**Activity 6.3.**

Changes to MIS Report publication timings

Responsibility: AEMO

Refer to *STTM Interface Protocol artefacts - STTM Reports Specification* consultation pack for details on impacted reports, and updated publication times

**Activity 6.4.**

Internal System Scheduler Application

Responsibility: AEMO IT

Change timing for internal scheduled batch jobs related to Gas RTO and GMM

**Activity 6.5.**

Submit Files

Responsibility: Allocation Agent for STTM Facility Operator

Submit PAD / MSD / NAD files by 10:30 hours

**Activity 6.6.**

Submit Files

Responsibility: STTM Facility Operator

Submit Facility Hub Capacity (FHC) file by 9:00 hours

**Activity 6.7.**

Configure file generation for allocation files for Transitional Gas Day

Responsibility: Allocation Agent for STTM Facility Operator

Configure allocation information for transitional gas day on 30 September 2019, for submissions on 1 October 2019 in accordance with standard gas day timings..

**Activity 6.8A.**

Submission of Provisional and Ex ANTE bid/offer

Responsibility: Market Participant

Ex ANTE and provisional Bid/offer submissions should reflect shorter gas day for 30 Sep 2019 and the new standard gas day for 1 Oct 2019

Price taker bids and steps for priced bids and offers should reflect changes to gas day

Activity 6.8.

Timing of submission for Provisional and Ex ANTE bid/offer

Responsibility: Market Participant

Ex ANTE Bid/offer submissions by 11:30 hours

Provisional (Day – 2 and Day - 3) bid/offer submissions by 13:30 hours

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## ATTACHMENT A CONSOLIDATED FEEDBACK FOR GDH TRANSITION PLAN – FIRST DRAFT

Respondent	Section ref	Issue / Comment	Proposed text <del>Red-strikeout</del> means delete and <u>blue underline</u> means insert	Rating <sup>1</sup> (H/M/L)	AEMO Response (AEMO only)
AGN Allgas	/ General	We note that this first draft of the AEMO transition plan describes the required activities at a very high level only. We look forward to reviewing further detail in the next draft and discussing at future GRCF meetings before the plan is finalised.		L	<p>This plan covers gas market transitions with minimal changes other than the implementation of a standard gas day and the timings associated with the gas day.</p> <p>Part 26 facility operators are required to develop and publish their transition plans, which will feed into gas markets.</p> <p>Following publication of these plans, industry readiness activities will develop any more detailed planning needed.</p>
Energy Australia	General	AEMO and/or distributor transition plans should also assess impacts on MDQ and MHQ on meter transition day and if meter conversion schedules impact on transition.		M	<p>It is unlikely that GDH will impact on MDQ and MHQ, but a new section has been added to the General Principles of Transition for facility operators to include impacts on MDQ/MHQ. See new item 12 in Section 1.6</p> <p><u>Part 26 facility operators must include the impact (if any) on MHQ/MDQ in their transition plans.</u></p>
AGN Allgas	/ 1.4 Transition Plan Out of Scope	We note that the NT retail market is out of scope for the AEMO transition plan, however APA will harmonise the AGN		L	AEMO acknowledges AGN/Allgas's feedback and has included a note in 1.4(c).

<sup>1</sup> L = Low: - Not critical. Issues / Comments are minor. They add clarity to the document. No major concern if not included in any further revisions  
M = Medium: - Important. Strong case that issue / comments should be consider and an update to the document is desirable, but not critical.  
H = High – Critical. The issue / comments are fundamental and failure to make necessary changes has the potential to impact consensus.

Respondent	Section ref	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	Rating <sup>1</sup> (H/M/L)	AEMO Response (AEMO only)
		interval metered sites and gate stations in Alice Springs.			<a href="#">Note that Part 26 facilities in the Northern Territory will need to implement the standard gas day as per (e)(i) below.</a>
AGN / Allgas	4(b) and Activity 1 and 2	AEMO to develop a transitional RMP to provide regulatory relief to Participants for the shorter gas day on 30 September 2019.	Is Participant (or Market Participant) meant to be a defined term?  For the SA RMP it should be clear that it also includes Pipeline Operators, noting the following definition of Participant in the SA RMP:  “participant” means each of a user and a network operator.	L	AEMO notes AGN/Allgas’s comment and advises that the transition provisions will include pipeline operators.
AGN / Allgas	4(b)	Regulatory Relief – the AEMO transition plan only considers regulatory relief for the short gas day. A cutover solution for AGN and Allgas interval meters is currently being developed, however it <u>may</u> not be possible for the reporting of all sites to be adjusted on the short day. Regulatory relief <u>may</u> also be required for some sites either side of the cutover date.		H	It is an NGR transitional requirement (Sch 5, Part 6 clause 2(2)) that part 26 facilities must take all necessary steps to ensure the standard market timetable is in use no later than 1 Oct 2019 (which includes having metering equipment that can measure over the standard gas day).  AEMO will seek advice as to whether it is possible to provide regulatory relief in the transitional arrangements.
Origin	4b	With the shorter gas day on the 30-Sep-19 how will that volume be accounted for? Will the volume will be accounted for on the 1-Oct-19?		M	Any gas that flows prior to 6am on 1 Oct 2019 must be accounted for in the relevant pre – harmonisation gas day.  Any flows after 6am on 1 Oct 2019 must be accounted for in the harmonised gas day.  AEMO has added item 5A under section 1.6 as follows

Respondent	Section ref	Issue / Comment	Proposed text <del>Red strikeout</del> means delete and <u>blue underline</u> means insert	Rating <sup>1</sup> (H/M/L)	AEMO Response (AEMO only)
					<p><u>Where hourly metering data is provided in South Australia, the last hourly interval for gas day 30 September 2019 will include data for the period from 5:30am to 6:00am AEST on 1 October 2019.</u></p> <p><u>No hourly metering data is provided to markets in Queensland or NSW/ACT.</u></p>
Origin	4b	Does AEMO receive hourly reads from Distributors which AEMO then sends to Retailers as daily reads?		L	<p>GDH does not affect the basis on which data is provided to AEMO or to Retailers. It only changes the start and end time of the gas day.</p> <p><u>Current data meter data provision is:</u></p> <p><u>NSWACT and QLD</u></p> <p>Basic Meter reads provided to AEMO cover multiple gas days and Interval Meter reads provided to AEMO cover a single gas day.</p> <p><u>SA</u></p> <p>Basic Meter reads provided to AEMO cover a multiple gas days.</p> <p>Interval Meter reads provided to AEMO are hourly.</p>
AGN Allgas	/ 4(b)(i)	Understand that this is written in context of the current Qld RMP, but for the purpose of the transition plan, suggest adding AEST for clarity.	For QLD the gas day will be defined as a period of 22 consecutive hours beginning at 8:00 am <u>(AEST)</u>	L	AEMO notes AGN/Allgas's comment and advises that the transition plan has been amended with the proposed text.
AGN Allgas	/ 4(b)(ii)	Understand that this is written in context of the current NSW/ACT RMP, but for the purpose of the transition plan, suggest adding AEST for clarity.	For NSW/ACT the gas day will be defined as a period of 23.5 consecutive hours beginning at 6:30 am <u>(AEST)</u>	L	AEMO notes AGN/Allgas's comment and advises that the transition plan has been amended with the proposed text.

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AGN Allgas	/ 4(b)(iii)	Understand that this is written in context of the current SA RMP, but for the purpose of the transition plan, suggest adding ACST for clarity.	For SA the gas day will be defined as a 23.5 hour period starting at 06:00 hours ( <u>ACST</u> ) on a day and ending at 05:30 hours ( <u>ACST</u> ) on the following day	L	AEMO notes AGN/Allgas's comment and advises that the transition plan has been amended with the proposed text with the addition of time in AEST for clarity and consistency.
AGN Allgas	/ 4	Add Activity 11 for provision of Interval Meter Data by the Network Operator to AEMO	Activity 11.  Network Operator to Provide Metering Data to AEMO for Each Interval-Metered Delivery Point (SA)  Responsibility: Network Operator  To provide interval metering data to AEMO no later than 3.5 hours after the end of the gas day in accordance with SA RMP	H	AEMO agrees to add this activity.  AEMO notes AGN/Allgas's comment and advises that the transition plan has been amended with the proposed text.
Energy Australia	1.6 (6)	Retailers will require the schedule of individual MIRNs for which re-programming interval meters is required.  It should be clarified that this will be provided within the 30 Jun 2019 update as this then only leaves effectively 2 months to 1 Oct 2019 before go live.	Transition plans will include regular reporting of the scheduling and completion of meter conversion.  a) Schedule conversion for the daily read meters as close as possible to transition date; <u>schedule of MIRNs to be provided to industry</u>  Transition plans should also include method of completion	M	AEMO acknowledges Energy Australia's feedback and has made the following updates to item 6 of section 1.6.  <u>b) Reporting of scheduling and completion of meter conversion should identify the meters by MIRN only</u>  <u>c) Transition plans should also include method of completion of meter conversion (e.g. Service Orders to be sent, impacts on meter data files)</u>  <u>d) Updates should be made at least weekly</u>



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			of meter conversion (e.g. Service Orders to be sent, impacts on meter data files)		
Origin	2c	Will there be a consultation period for the Industry Cutover Plan well ahead of its publication at the end of August 2019?  Furthermore, what will the Industry Cutover Plan cover over and above the Transition Plan that will be finalised in April 2019?		M	AEMO will assess stakeholder readiness plans to determine the need for consultation. It is important that stakeholders provide AEMO with a readiness plan for planning and implementation timelines.  AEMO will coordinate the industry cutover plan in consultation with industry
Jemena	1.6.5	Jemena will require a staged approach in its transition plan to give effect to subtasks (a) (b) and (c) depending on remote comms and STTM, ACT vs regional networks. What is AEMO's risk mitigation plan if not all meters are complete by the 1st of October 2019?			It is an NGR transitional requirement (Sch 5, Part 6 clause 2(2)) that part 26 facilities must take all necessary steps to ensure the standard market timetable is in use no later than 1 Oct 2019 (which includes having metering equipment that can measure over the standard gas day).  Gas markets will use all metering data provided on the assumption that it is for a standard gas day. Processes are available for any data relating to a non-standard gas day to be substituted either prospectively or retrospectively.  As per General Principles for Transition 6(e):  Transition plans should include details of any contingency plans to substitute metering data being measured in non-harmonised gas days with estimates for a standard gas day after 1 October 2019.

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Jemena	1.6.6	Jemena will require flexibility to effect conversion and enable the transition of data reporting up to and possibly after GDH becomes effective on 1 Oct 2019. It is to be determined as to when and how long it will take Jemena to convert all its relevant flow meters, and what approach it will propose (that is, conversion before, on-the-day and possibly shortly after 1 Oct 2019). Jemena is currently determining what it will take to convert existing meters to the new Gas Day and will develop a plan to convert all meters and its associated reporting to be compliant with the new Gas Day by or as close as possible to 1 Oct 2019.			See comments for Jemena's response to 1.6.5 above and AGN/Allgas's comments
Jemena	1.6.8	AEMO EDD data feeds are to Jemena. Estimation methodology unchanged.			AEMO notes Jemena's comment.
Jemena	1.6.10	STTM Procedures times are specified as an offset from gas day start/end, whereas RMP data delivery times are currently referenced as clock times.			AEMO has published proposed changes to RMP.
Jemena	1.6.11 and 4 Retail Gas Markets 4 Retail Gas Markets Activity 7	For clarity, Jemena seeks to confirm the following RMP data delivery obligations remain as:  *RMP 3.6.6 (c) (i) 9:30am STTM  *RMP 3.6.6. (c) (ii) 12.00 noon non-STTM  If this is not the case, Jemena is concerned that it will not be able to maintain on-the-day data quality with			Energy data to AEMO (as per RMP 3.6.6(c)(i)) is made to be provided by 9am to allow sufficient time for GRMBS to calculate STTM distribution system allocation.  RMP 3.6.6(c)(ii) time does not change as it is non-STTM.

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		<p>amended timeframes and would appreciate further discussion with AEMO on the implications.</p> <p>Jemena advises the impact of the proposed change to 9.00am data delivery is:</p> <p><i>*Increased operational risks, potential for increased estimated consumption content in first data publication and increased consequent data update publication due to:</i></p> <ul style="list-style-type: none"> <li>- shorter effective time to validate data for ~500 interval meters</li> <li>- reduced availability and frequency of public transport for interval meter data personnel to reliably arrive at work for 6:00am.</li> <li>- reduced available time for IT and business personnel to resolve data processing issues by 9:00am.</li> <li>- IT batch sequences for interval meter and receipt point data processing will need to be reconfigured, tested and proven – increasing implementation costs and risks.</li> </ul> <p>Activity 7: Provision of Energy Data to AEMO (NSW/ACT) “To provide daily metering data to AEMO no later than 3 hours after 3 hours after the start of the gas day in accordance with NSW/ACT RMP”.</p>			<p>Sec 4 Activity 7 of the transition plan only applies to STTM.</p> <p>AEMO confirms the times will be unchanged for the followings:</p> <p>RMP 3.6.1(b) Heating Values 1:30pm</p> <p>RMP 3.6.1(c) Heating Values published by AEMO 5.00pm</p> <p>User Daily Imbalance (Provisional) RMP 8.8.1(a) 3.00pm GD+2</p> <p>User Daily Imbalance (Revision) RMP 8.8.1(c) 9.00am 5th BD after Day 15 following month</p> <p>AEMO also advises that the RMP changes are being covered by the consultation for IN002/16.</p>

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		<p>AEMO to clarify application of Activity 7 to STTM ONLY or for ALL daily metered data.</p> <p>If ALL, this results in a 3 hour reduction of data validation time for approximately 30 regional network sections including ~100 ACT Canberra and NSW regional interval gas meters, which are not linked to Sydney STTM market schedule operations.</p> <p>Jemena requests confirmation that the following data delivery and receipt times will be unchanged in the RMPs as they are not linked to the STTM daily market schedule.</p> <p>RMP 3.6.1 (b) Heating Values 1:30pm</p> <p>RMP 3.6.1 (c) Heating Values published by</p> <p>AEMO 5.00pm</p> <p>User Daily Imbalance (Provisional)</p> <p>RMP 8.8.1 (a) 3.00pm GD+2</p> <p>User Daily Imbalance (Revision)</p> <p>RMP 8.8.1 (c) 9.00am 5th BD after Day 15 following month.</p>			
AEMO	Activity 6.1 (previous activity 1	AEMO has identified that this activity is not required			AEMO has marked the activity as not required.

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	under section 6)				
AEMO	Activity numberin g	Renumber the activity by including the section number in them	Activity 1 under section 4 is now Activity 4.1		AEMO has amended all activity numbers in the transition plan

\*\*\* Use this section to raise points that aren't specific to a section

Alinta

Alinta appreciates the opportunity to provide feedback to AEMO's Gas Day Harmonisation Transition Plan. Broadly speaking, Alinta is comfortable with the topic areas covered within AEMO's transition plan and the identified areas which require system and/or procedure changes to facilitate gas day harmonisation.

To further assist the development of AEMO's transition plan, Alinta would encourage AEMO to also include "transition day" analysis into the potential market-price impacts on the STTM's, GSH, CTP and GAA from having 22/23.5 hours of actual "transition day" data being fed into the market trading mechanisms and platforms that were designed for 24 hours of consumption and supply. For example, the current STTM ex-ante PTW's are based on 24 hours consumption but on "transition day" participants will only be allocating for 22/23.5 hours' worth of usage. As such, if no special market transition arrangements are made for this day, this situation could result in artificially lower actual usage being utilised by the ex-post price calculation causing a possible ex-post price crash, artificial deviations and adverse MOS outcomes.

Market participants therefore need to understand what special transition arrangements for that day, will be implemented by AEMO to ensure consistent market outcomes on transition day as proposed. Such analysis could form part of AEMO's chapter 5 (wholesale Gas Markets) or Chapter 6 (Gas Real Time Operations/Monitoring).

Alinta looks forward to participating in AEMO's Harmonisation Day Transition process going forward.

AEMO Response

Thank you for your response. Participants within the markets should ensure they have adequately assessed their demand forecasts, and their supply nominations to ensure any mismatch is minimised on the transition day. AEMO expects participants will need to have completed detailed analysis in order to

manage risk and minimise the impacts on the market. As you point out the PTW will be prorated across the transition day, as will be the supply nominations – and to the extent these are accurately forecast/nominated any impact on the market will be minimised. AEMO will communicate with all participants to ensure they understand this in order to minimise any impacts on the transition day and has added new activity 6.8A to reflect this.

**Energy Australia**

The transition plans of natural gas facilities by 30 June 2019 has impacts on at least Activity 1 and 2 of item 4, Retail Gas Markets however this has been identified as out of scope. Impacts of the transition plan, and the transition plans identified in Item 4 Retail Gas Markets, and industry cutover plan expected August 2019 (item 2(c)) are also related.

EnergyAustralia considers it is necessary and beneficial to stipulate the detail of what should be provided within the transition plan at each milestone date – e.g. item 1.6(6) above as identified, has highlighted that *“Transition plans will include regular reporting of the scheduling and completion of meter conversion”* but does not identify when the detail (e.g. actual schedules with MIRNs, any service orders expected, batch meter data files) is expected to be known.

We also note the timing of the transition plans leaves 1-2 months before 1 October 2019 go-live, which is a short lead-time to identify and rectify any issues or impacts.

**AEMO response:**

AEMO expects that each stakeholder will regularly report the number of meters converted and the number of meters scheduled to be converted and has updated the guideline accordingly.

AEMO has also noted that the industry readiness plan will be developed in conjunction with industry, with the intent to identify and resolve problems as soon as possible.

**Origin**

1. Origin request that AEMO work with MDPs facility operators to develop and publish a metering transition plan by 31-Mar-19. A delay in receiving the metering transition plan may result in Origin having insufficient time to provide input or adapt to the plan.
2. If after 1-Oct-19, Origin request AEMO for historical data, how will the historical data be presented? EG: will gas day start from 0600 AEST OR will gas day start revert to historical 0630 AEST for Sydney STTM, Adelaide STTM and Moomba GSH; 0800 AEST for Wallumbilla GSH, Brisbane STTM and 0600 AEST for Victorian DWGM for anything before 1-Oct-19?

**AEMO response:**

1. The NGR requires Part 24 facilities to publish their transition plan by 30 June 2019, so it is not feasible to publish by 31 March 2019 as suggested.
2. AEMO notes that data formats in all reports and transactions will not change. Generally, data is provided by gas day, so the gas day in question will be determined by reference to the gas day in the report – for example a report including gas day 27 June 2019 will be for the non-harmonised gas day, and one for 12 October 2019 will be for a standard gas day. In markets where hourly data is provided, two fields are provided for gas day and hour, so the gas day will still reflect the gas day in force at that time.

#### AGL

##### 1. Meter Conversions

One potential issue currently being considered by AGL is the impact of the progressive conversion of Daily Meters from the current gas day to the new gas day. Prior to the 1 October 2019, all Daily Meters are expected to be progressively reprogrammed to the new gas day. This means there will be a growing mismatch between Custody Transfer Meter deliveries and Daily Meter withdrawals, which impacts the remaining gas allocated to basic meters. Where there is a mismatch, the basic meter allocation for each day (d2) will have a proportion of the previous gas day (d1) allocated to it, and a proportion of that day's gas deliveries will be allocated to the next gas day. While this may not be substantial on weekdays, there is likely to be a bigger impact around weekends and public holidays where there is a change in load from the previous day. AGL recommends that AEMO (which has all gas data) undertake a short study to determine the potential significance of the impact, so that a plan to mitigate the impact can be developed if necessary.

##### 2. Load Forecasting

AGL notes that Market Participants will need to adjust their load forecasting models for the shorter transition day on 30 September 2019 and with the new gas day from 1 October 2019. As this is an internal function, we appreciate that AEMO may not wish to include this in the Transition Plan.

##### 3. Estimates of Daily Meters

In APA's submission to the Retail Market Procedure changes for Gas Day Harmonisation, it noted that the changes could lead to an increase in the number of estimates and resends of reports with regard to interval meter data. This is due to APA being required to process and report on all jurisdictions at the same time, instead of being staggered throughout the morning (as it does currently). While AEMO did not support APA's proposal to address the issue, AGL would appreciate AEMO investigating this issue further. AEMO should determine whether a significant number of estimates are likely to be used, and if so whether there are any other solutions to minimise the use of estimates.

#### AEMO's response:

1. In item 5 of section 1.6, AEMO notes part 26 facilities will need to report meter data for the relevant gas day even if the meter has already been converted to measure for the standard gas day.  
AEMO notes that hourly data is to hand only for the South Australia retail market and will scope out a study of the impact of changing to the standard gas day. As data is only available for hours commencing at 30 minutes past the hour, this study would have limitations.
2. AEMO notes AGL comments on load forecasting and agrees that this is a market participant related activity.

3. AEMO does not believe that an increase in estimations for interval meters will have a significant lasting effect, because:
- a. STTM ex post prices are determined without use of interval meter data.
  - b. In all markets the quantum of retail allocations is determined by injections from comparatively few custody transfer points for which estimates are unlikely to significantly increase.
  - c. The data for interval meters will be mostly be available before first prudential assessment later on D+1

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