

PPC response template for STTM Reports Consultation 2020

Responses to be emailed to gwcf_correspondence@aemo.com.au by due **COB (AEDT) 9 November 2020.**

Review comments submitted by: *Shell Energy Australia/ERM Power*

Date: 3 November 2020

Contact Person: *Sarah Kok, Commercial Manager - Gas*

Please complete sections 1. Section 2 is optional.

Topic	Please Provide Response Here
<p>Sections 1 to 8 of the PPC sets out <u><i>AEMO's critical examination of the proposal.</i></u></p> <p>Does your organisation support AEMO's examination of the proposal?</p> <p>If no, please specify areas in which your organisation disputes AEMO examination proposal and include information that supports your organisation's rationale for not supporting AEMO's examination.</p>	<p>Refer to comments in Section 2.</p>

Section 2 - Feedback on the documentation changes described in Attachment B of the PPC.

Participants are to complete the relevant columns below in order to record their response.

Ref #1 – STTM Procedures

Section #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
Section 7.6	<p>We do not agree that AEMO should have absolute discretion in deciding whether an STTM Event Report should be prepared and published.</p> <p>The current reports provide transparency of facility operator & AEMO performance in relation to their STTM obligations. Such reporting also provides incentives to facility operators (and AEMO) to ensure they have processes in place to meet their obligations in a timely manner (given that the reports will publicly identify the party who has failed to meet an STTM obligation and outline reasons for the failure). While not every event may have market impacts, market impacts are possible and participants require confidence in knowing that STTM Event Reports will be published to enable them to understand the causes, actions taken, impacts and outcomes.</p> <p>Given there have only been 10 reports to date, we do not believe the existing obligation imposes a significant burden on AEMO.</p>	may <u>must</u>	
Section 5.2	<p>We do not agree with the proposal to allow AEMO to have complete discretion in deciding whether or not to consult on MOS methodology changes. This is because MOS Methodology changes can have impacts on the market, market participants and consumers.</p> <p>We agree however that AEMO should be able to make changes that are administrative in nature without needing to consult and have proposed wording to this effect.</p>	<p>(h) AEMO must publish the methodology employed to determine the quantities required by rule 397 for each STTM pipeline and <u>subject to clause (i), may must</u>, before making changes to that methodology, consult with: (i) Trading Participants; and (ii) any other person AEMO considers would be affected by the proposed changes.</p> <p><u>(i) If the changes to the methodology described in clause (h) are administrative in nature, AEMO may, but is not obliged to, consult with (i) Trading Participants; and (ii) and other person AEMO considers would be affected by the proposed changes.</u></p>	

Participants are to complete the relevant columns below in order to record their response.

Ref #2 – STTM Interface Protocol

Section #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)