PPC response template for IN004/20 (NSW/ACT BL and TSF changes) – Responses to be emailed to grcf@aemo.com.au by due 21 June 2021.

Review comments submitted by: *AGL* Date: *21 June 2021*

Contact Person: *Mark Riley*

Please complete sections 1 and 2. Section 3 is optional.

Section 1 - General Comments on the Proposed Procedure Change

Topic	Please Provide Response Here
Sections 1 to 9 of the PPC sets out details of the proposal. Does your organisation support AEMO's assessment of the proposal? If no, please specify areas in which your organisation disputes AEMO's assessment (include PPC section reference number) of the proposal and include information that supports your organisation's rationale for not supporting AEMO's assessment.	AGL believes that his proposal has been appropriately assessed through the GMI process, however does have comments regarding the actual drafting.

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

Participants are to complete the relevant columns below in order to record their response.			
NSW/ACT RMPs			
RMP Clause #	Issue / Comment	Proposed text ~~Red strikeout~~ means delete and blue underline means insert	AEMO Response (AEMO only)
General Comment	The insertion of additional clauses to explain the new methodologies has led to the current clause becoming more complex and unwieldly. Further, some new clauses (eg varied summer/winter periods) do not seem to be inserted into the correct sections, as these clauses apply to Type 2 estimation /substitutions, but are included in the Type 1 estimation/substitution sections. AGL would suggest that clause headings be updated and new sub-clauses be created to capture the new calculations. More details are below.		
Def Occupancy factor	Suggest minor change as the occupancy factor would be used in the type 2 estimations, rather than eligible	*occupancy factor* In relation to a *delivery point* supplied by a *volume boundary meter* or a *volume boundary hybrid* meter, the deemed average occupancy of medium-density or high-rise premises used in ~~eligible for~~ Type 2 estimations and substitutions in accordance with Attachment 2 and Attachment 3 respectively.	

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NSW/ACT RMPs			
Def Base Load	The unit of measure for Base Load is not defined, but is used within the same calculation as the Temperature Sensitivity Factor and should have a nominated unit of measure	Update the definition to have consistent units of measure to TSF *base load* In relation to a *delivery point,* the level of *gas* consumption, measured in MJ, at that *delivery point* that is not affected by the weather.	
Definition – New	This period is used extensively through the NSW procedures in various processes and defining the periods could simply the drafting.	*Summer Period* The period between 1 October and 31 March within the current 12-month period	
Definition - New	This period is used extensively through the NSW procedures in various processes and defining the periods could simply the drafting.	*Winter Period* The period between 1 April and 30 September within the current 12-month period	
Definition – New	Defining the alternative periods allows for further usage within the procedures.	*Alternative Summer Period* *The period starting 7 days earlier and ending 7 days later than the Summer Period.*	
Definition – New	Defining the alternative periods allows for further usage within the procedures.	*Alternative Winter Period* *The period starting 7 days earlier and ending 7 days later than the Winter Period.*	
Definitions	If these proposed new definitions are applied, then various edits would be required to specify the definitions and remove the defining text from within the procedures.		

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NSW/ACT RMPs			
A2.1	Section header is inconsistent with subsequent clauses. Rename for clarity and improved reading.	Rename heading from Gas Meters to Gas Meter Estimation Methodology	
A2.1	Suggest rewording for clarity and remove the relationship to Type 1 calculations, as the specification is to use a different set of dates if the initial windows are not applicable. Also suggest relocating this clause from the Type 1 section to the type 2 section, where it is applicable.	(v) For quarterly read meters which have at least 12 months' consumption history, but with the *reading periods* not being wholly within defined *summer period* and *winter period*, the Network Operator may use the *Alternative Summer Period* to determine the *base load and the Alternative Winter Period* to determine the *temperature sensitivity factors for Type 2* Estimations. ~~(v) For quarterly read meters which have at least 12 months' consumption history and are ineligible for Type 1 calculation of *base load* and *temperature sensitivity factor* due to *reading periods* not being wholly within defined summer and winter periods, the Network Operator may use readings between 23 September and 7 April for the purposes of calculating a *base load* and *reading periods* between 24 March and 7 October for the purposes of calculating the *temperature sensitivity factor*.~~	

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NSW/ACT RMPs			
A3.1	Suggest rewording for clarity and remove the relationship to Type 1 calculations, as the specification is to use a different set of dates if the initial windows are not applicable. Also suggest relocating this clause from the Type 1 section to the Type 2 section, where it is applicable.	(v) For quarterly read meters which have at least 12 months' consumption history but with the *reading periods* not being wholly within defined *summer period* and *winter periods*, the Network Operator may use the *Alternative Summer Period* to determine the *base load and the Alternative Winter Period* to determine the *temperature sensitivity factors for Type 2 Substitutions.* ~~(v) For quarterly read meters which have at least 12 months' consumption history and are ineligible for Type 1 calculation of *base load* and *temperature sensitivity factor* due to *reading periods* not being wholly within defined summer and winter periods, the Network Operator may use readings between 23 September and 7 April for the purposes of calculating a *base load* and *reading periods* between 24 March and 7 October for the purposes of calculating the *temperature sensitivity factor.*~~	
A2.1	The additional components for Volume Boundary/Hybrid meters is quite extensive and AGL suggests that this warrants a subsection [(d)] for these meters so that the estimation requirements are clearly separated from other non-daily read meters.	New Header (d) Type 2 Estimation Methodology (Gas non-daily metered) – Volume Boundary / Volume Boundary Hybrid Meters (i) A network Operator must determine…..volume boundary …… (ii) The *base load* and *temperature sensitivity*….	
A2.1	Section header is inconsistent with subsequent clauses. Rename for clarity and improved reading.	Rename heading from Gas Meters to Gas Meter Substitution Methodology	

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NSW/ACT RMPs			
A3.1	The additional components for Volume Boundary/Hybrid meters is quite extensive and AGL suggests that this warrants a subsection for these meters so that the estimation requirements are clearly separated from other non-daily read meters.	New Header Type 2 Substitution Methodology (Gas non-daily metered) – Volume Boundary / Volume Boundary Hybrid Meters (i) A network Operator must determine…..volume boundary …… (ii) The *base load* and *temperature sensitivity*...	
A3.2	Same comments as above about defining summer and winter periods; Same comment that this clause should be included in the Type 2 section.		
A3.2 (b) iv – xi	Per comments above, this clause could now be split into an additional sub-clause		

Section 3[1] –Additional feedback that is not part of this consultation but warrants further investigations / discussions.

Topic	Please Provide Response Here
Does your organisation have any feedback / suggestions that closely relates to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please included your feedback / suggestions.	Only to suggest that Gas Metrology would benefit from being moved into a separate document as part of a broader process to consolidate and clean up gas metrology so that common processes can be harmonized.

[1] Note - This feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process