



Response template for PPC on DWGM Procedure changes for Hydrogen and DCF Rule Changes

Email responses to: GWCF_Correspondence@aemo.com.au

Review comments submitted by: *APA*

Confidential: No

Date: *16/10/2023*

Contact Person: *Kate Lucas*

Please complete sections 1 and 2.

Section 1 - General Comments on the Procedure changes

Topic	Please Provide Response Here
<p>General Comments</p> <p>Does your organisation support AEMO's assessment of the proposal?</p> <p>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 why you do not support AEMO's assessment.</p>	
<p>Wholesale Market Connection Approval Procedures</p>	<p>Clause 2.2 Figure 1 DTS Connection Approval Process Schematics:</p> <p>As a general comment, the connection application submitted to the DTSSP will be reviewed by the DTSSP from the technical assurance perspective. It can be rejected if the required technical specifications are not met.</p> <p>Considering DTSSP has its internal processes for connection design technical assurance and commercial negotiations in line with NGR, APA proposes to add the following</p>

	<p>caption for the clarification: 'The process flow outlines the steps relevant for AEMO/DTSSP and AEMO/Connection Applicant interactions. The DTSSP internal processes for design approval and commercial negotiations are not included in the process schematics.</p> <p>Clause 3.6.1 APA would like to note, recognizing the procedures specify AEMO's specific safety criteria assessment steps, that as a part of the new connection design process, DTSSP may also determine the need for HAZOP based on its internal approval processes.</p>
<p>Wholesale Market Distribution Procedures, which include:</p> <ul style="list-style-type: none"> - Distribution Operational Coordination Procedure - Net Bidding Procedures 	<p>Clause 3.3(a) APA acknowledges that AEMO's definition of the net bidding facility includes DTS and DDS connected blend processing facility, which reflects the proposed rule 204(B) 'Classification of net bidding facilities' of the NGR. APA would like to note that, while included in the DWGM under the proposed rules for Hydrogen and Renewable Gases Framework Extension, the technical and safety assurance, including the gas quality specifications, must apply for a blend processing facility to receive approval to connect to DTS.</p> <p>Clause 3.5 APA suggests further clarification of 3.5(a)(iii) and 3.5(a)(iv) to be incorporated into the Procedures by AEMO, including an explanation of how the metering point (iii) is to be differentiated from the metering point (iv), and potential example of the interplay of (A) (E) under 3.5(a)(iii)</p>
<p>Wholesale Market Gas Quality Procedures</p>	<p>We agree with the inclusion of Clause 2.4.3 'Hydrogen gas production facility and blend processing facility' and Clause 2.4.4 'Biomethane gas production facility' in the Procedures, which addresses our earlier point on DTS blend processing facility (section 'Wholesale Market Connection Approval Procedures ') and its current technical feasibility.</p> <p>Clause 2.10.5</p>

	<p>Before AEMO issues a requirement to a responsible gas quality monitoring provider (RGQMP) to undertake an audit of the gas quality monitoring system (GQMS), APA would see it reasonable to include the provision for AEMO to engage with a responsible gas quality monitoring provider prior such request to address all the relevant gas quality monitoring concerns. Noting the costs associated with an audit are to be borne by a provider, AEMO should work with the responsible GQMP as a first step to identify the root causes of the issues,</p> <p>Clause 2.10.2 APA suggests excluding the clause from the Procedures as the provision for the gas quality monitoring plan already addresses the compliance monitoring of the gas quality monitoring systems. The online gas quality monitoring by description represents automated measurement via gas quality monitoring equipment. The gas quality monitoring plan sets out the requirement for automated sampling frequency and monitoring point information provision. Regarding an offline monitoring system, the gas quality monitoring plan must include the offline monitoring test frequency. Compliance monitoring is inherent in providing a gas quality monitoring plan with such requirements. Any additional reference (e.g., Clause 2.10.2) of the compliance monitoring is unnecessary and, in our view, should be excluded for the simplicity and avoidance of repetition.</p>
Wholesale Market Maintenance Planning Procedures	No comment
Wholesale Market Management Procedures, which include: <ul style="list-style-type: none"> - Additional Reporting Procedures - Electronic Communication Procedures - Gas Ownership Rules - Rule Consultation Procedures 	Clause 4.3: <ol style="list-style-type: none"> 1. APA recognizes AEMO’s proposal to expand Clause 4.3 with the additional wording to reflect on the rule 343(1)(d) provisions. As ‘title to gas’ concept does not apply to a Facility Operator, for the avoidance of doubt, APA proposes the following amendment to the proposed wording:

	<p>'A Registered participant, who is not a Market Participant, may be directed by AEMO to inject non-firm gas pursuant to rule 343(1)(c) or off-specification gas pursuant to rule 343(1)(d) <i>if that Registered participant has title to that gas.</i></p> <p>Title to gas injected by <i>such</i> a Registered Participant that is not a Market Participant is taken to pass as if the Registered Participant was a Market Participant.'</p> <p>2. AEMO should advise a gas allocation process when a Registered Participant is directed to inject the gas due to AEMO's system security threat intervention. The Registered Participant's directed gas will be registered by a relevant system meter, however, in the absence of a MIRN for Registered Participants, an allocation of the directed gas to this Registered Participant cannot occur automatically.</p> <p>The gas allocation process for system security threats should not impact and require changes to the existing allocation systems for Allocation agents.</p>
<p>Wholesale Market Metering Procedures, which include:</p> <ul style="list-style-type: none"> - Metering Uncertainty Limits and Calibration Requirements Procedures - Energy Calculation Procedures - Metering Communications Procedures - Installation Database Procedures - Metering Installation Coordination Procedures - Metering Register Procedures - Data Validation Procedures 	
<p>Wholesale Market Operation Procedures, which include:</p> <ul style="list-style-type: none"> - Accreditation Procedures - Administered Pricing Procedures 	<p>Clause 4.9.3(iii)</p> <p>For the avoidance of doubt, APA proposes to change the reference to the injection and withdrawal points for the distribution connected facility to 'DDS injected point' and 'DDS</p>

<ul style="list-style-type: none"> - Capacity Auction Procedures - Capacity Trading Procedures - LNG Reserve Procedures - Gas Scheduling Procedures 	<p>withdrawal point' accordingly, as the distribution connection facility can only inject or withdraw within DDS, but not DTS.</p> <p>Clause 7.10.2</p> <p>The proposed changes are as in the above Clause 4.9.3(iii) comment: 'for application at a distribution connected facility market injection point or market withdrawal point 'to replace with 'for application at a distribution connected facility DDS injection point or DDS withdrawal point.'</p>
<p>Wholesale Market Settlement Procedures, which include:</p> <ul style="list-style-type: none"> - Ancillary Payment Procedures - Uplift Payment Procedures - Compensation Procedures - DUAFG Procedures 	<p>No comment</p>
<p>Wholesale Market System Security Procedures</p>	<p>No comment</p>

Section 2 – Specific Questions from PPC

Topic	Please Provide Response Here
<p>Question 1: Do participants consider the 5TJ/d constraint materiality threshold for inclusion of a constraint in the scheduling window? For the avoidance of doubt, this proposal applies to distribution connected facilities (under the distribution operational coordination procedure) and to DTS connected facilities (under the gas scheduling procedures).</p>	
<p>Question 2: Do participants consider the 5TJ/d constraint materiality threshold for sending a SWN is appropriate as AEMO already publishes all constraints at schedule approval? For the avoidance of doubt, this proposal applies to distribution connected facilities (under the distribution operational coordination procedure) and to DTS connected facilities (under the gas scheduling procedures).</p>	
<p>Question 4: Do Registered Participants agree that a 3 monthly communication limit is appropriate for routine notifications concerning Responsible Persons notifications under rules? If not please nominate a alternate timeframe (including a justification) for routine communications?</p>	

Section 3 - Feedback on the documentation changes in the Procedures

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

Wholesale Market Connection Approval Procedures

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

Wholesale Market Distribution Procedures (including Distribution Operation Coordination Procedures and Net Bidding Facility Procedures)

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

Wholesale Market Gas Quality Procedures

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

Wholesale Market Maintenance Planning Procedures

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

Wholesale Market Management Procedures (including Additional Reporting Procedures, Electronic Communication Procedures, Gas Ownership Rules Procedure and Rule Change Consultation Procedures)

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

Wholesale Market Metering Procedures (including the Metering Uncertainty Limits and Calibration Requirements Procedures, Energy Calculation Procedures, Metering Communications Procedures, Installation Database Procedures, Metering Installation Coordination Procedures, Metering Register Procedures and Data Validation Procedures)

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

Wholesale Market Operation Procedures (including the Accreditation Procedures, Administered Pricing Procedures, Capacity Certificate Auction Procedures, Capacity Certificate Trading Procedures, LNG Reserve Procedure and Gas Scheduling Procedures)

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

Wholesale Market Settlements Procedures (Including the Ancillary Payment Procedures, Uplift Payment Procedures, Compensation Procedures and DUAFG Procedures)

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

Wholesale Market System Security Procedures

Procedure Clause #	Issue / Comment	Proposed text Red strik out means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)

Attachment D - DWGM - Technical Specification

INT Report	Issue / Comment	Proposed text Red strikeout means delete and blue <u>underline</u> means insert	AEMO Response (AEMO only)
INT139			
INT139A			
INT188			
INT140			
INT1176			
INT240			
INT241			