

Notice of AEMO decision

This Notice is to advise of AEMO's decision to amend the following Procedures:

- BB Procedures v13.0

AEMO is also amending the following GBB technical documents:

- BB Aggregation Methodology v1.3
- BB Data Submission Guide v2.1
- Guide to Gas Bulletin Board Reports v2.3

These are the BB Procedures are made in accordance with section 91BL of the National Gas Law (NGL) and the National Gas Rules (NGR). AEMO has consulted participants on the technical documents changes in parallel as part of the Procedure consultation. These Procedures and technical documents are to be effective from 3 March 2025.

To make these Procedures, AEMO undertook the ordinary process for making Procedure changes under Part 15B of the rules. The consultation process had the following stages:

- PPC published: 1 July 2024
- PPC consultation submissions due: 29 July 2024
- IIR publication date: 26 August 2024
- IIR consultation submissions due: 3 October 2024
- Decision published: 31 October 2024
- Effective Date of Procedures: 3 March 2025

As required under Rule 135EE of the National Gas Rules (NGR), Registered participants and other interested parties were invited to submit comments to AEMO on the new Procedures.

As required under Rule 135EE of the NGR, AEMO published this Notice of Decision regarding this Procedures consultation on 31 October 2024 with an effective date of 3 March 2025. AEMO's decision is to implement the proposed GBB Procedures and technical documents issued for this consultation as set out in Attachment A of this Notice.

Responses to submissions received to the Impact and Implementation Report and amendments to the Procedures proposed in response to the IRR are summarised in Attachment C.

The key changes to the document made by this consultation process are summarised below:

- BB Procedures v13.0

- Update for the implementation of the AEMC’s rule changes from the review into extending the regulatory frameworks to hydrogen and renewable gases. This includes updates to account for new BB blend processing facilities and BB blended gas distribution to clauses 6.1, 6.5.2, 13.1.1 and new clauses 6.4.6 (nominated and forecast use of BB blend processing facilities) and 10.5 (reporting gas blend and gas blend curtailment information).
- **BB Aggregation Methodology v1.3**
 - Update for the implementation of the AEMC’s rule changes from the review into extending the regulatory frameworks to hydrogen and renewable gases.
- **BB Data Submission Guide v2.1**
 - Update for the implementation of the AEMC’s rule changes from the review into extending the regulatory frameworks to hydrogen and renewable gases including new Gas Blend and Gas Blend Curtailment submission.
 - AEMO has moved the BB API examples and operational notes to the AEMO webpage and removed them from this Guide.
 - Minor clarifications to section 4.6 and section 4.14 of the Guide.
 - Minor amendments identified in Attachment C.5 of this document.
- **Guide to Gas Bulletin Board Reports v2.3**
 - Update for the implementation of the AEMC’s rule changes from the review into extending the regulatory frameworks to hydrogen and renewable gases including addition of Gas Blend and Gas Blend Curtailment report.
 - Report examples have been removed as they are now provided on the AEMO website API webpage.

Attachment A. GBB Procedures and technical document changes

The following consultation documents are provided:

- BB Procedures v13.0
- BB Aggregation Methodology v1.3
- BB Data Submission Guide v2.1
- Guide to Bulletin Board Reports v2.3

Attachment B. GBB Technical Specifications

AEMO has published a GBB Technical Specifications as part of the implementation to detail changes to the Gas Data Model.¹ The GBB Technical Specification has been published in parallel to the rules required consultation for the BB Procedures in Attachment A.

The GBB Technical Specification has been published on AEMO's [Technical Specification Portal](#) under the Gas Data Model heading.

¹ Webpage link: https://visualisations.aemo.com.au/aemo/web-techspecportal/Content/TSP_GDM221_Mar2025/Gas_Data_Model_v2.2.1_March_2025.htm?TocPath=Gas%20Data%2%A0Model%7CGDM%202.2.1-March%202025%7C_____0

Attachment C. Response to Participant Submissions

The following responses were received from participants in response to the Impact and Implementation Report.

C.1 General comments

Reference	Submitter	Submission details	AEMO response
General Comments			
C.1.1		No comments were received from participants.	

C.2 Specific Question

Reference	Submitter	Submission details	AEMO response
Question 1: Should the BB Procedures require BB pipeline and BB blended gas distribution system operators that report Gas Blend and Gas Blend Curtailment information for part of a BB facility, to provide that data on the basis of impacted heating value zones?			
C.2.1		No comments were received in response to this question.	Noted. The BB Procedures have not been amended.

C.3 GBB Procedures

Reference	Submitter	Submission details	AEMO response
General Comments			
C.3.1	Jemena	<p>In Jemena’s PPC response, Jemena raised concern that a BB reporting entity may not know that it is transporting a gas blend when it receives a co-mingled stream of gas from another BB facility. In response, AEMO stated that rule 190G(2) requires the reporting of any primary gas subject to a ‘blend level’ only and inserted Note 1 under clause 10.5.</p> <p>It is Jemena’s understanding that ‘blend level’ refers to the volume concentration of a primary gas other than natural gas, which includes biomethane, synthetic methane and hydrogen, given the definition of ‘primary gas’ in the National Gas Law. The definition of ‘blend level’ under rule 190G(3) does not specifically refer to a primary gas that is subject to a ‘blending limit’. ‘Blending limit’ is defined in rule</p>	<p>AEMO has amended Note 1 has amended the paragraph to be: <i>Note 1: This reporting obligation applies to BB blended gas distribution systems and BB pipelines that receipt a gas blend from another BB facility (that may be a BB pipeline, BB production facility or BB blend processing provider) that injects a primary gas other than natural gas that is subject to a blending level limit.</i></p> <p>AEMO considers the ‘Additional Note’ proposed by Jemena is beyond the scope of AEMO’s powers for the BB Procedures as allowed by Rule 135EA(3) and Part 18.</p>

Reference	Submitter	Submission details	AEMO response
		<p>100A of the NGR to mean in relation to a gas blend, a limitation or set of limitations, which may vary according to circumstance, on the proportion of a primary gas that the service provider allows to form part of the gas blend, whether for operational, compliance or other reasons.</p> <p>Jemena’s interpretation of Rule 190G(1)(b) is that in the case of a BB pipeline, the obligation to report gas blend information and gas blend curtailment information would only arise in circumstances where the BB pipeline is knowingly transporting a gas blend that is subject to a ‘blending limit’. Consistent with AEMO’s view, Jemena agrees that this obligation will most likely apply in relation to hydrogen-blended gas, as opposed to biomethane or synthetic methane. In Jemena’s view, to the extent that a BB pipeline has a 0% blending limit for hydrogen and the BB pipeline operator has no reasonable grounds to believe that it is transporting a hydrogen-gas blend, it would not be required to report any information under Rule 190G. Jemena suggests that Note 1 inserted by AEMO under clause 10.5 of the BB Procedures should refer to ‘blending limit’ rather than ‘blending level’.</p> <p>In any case, Note 1 does not sufficiently address the crux of the issue raised in Jemena’s previous submission. That is, there is a risk that a BB pipeline operator may not realise the reporting obligation under rule 190G is triggered if it receives a co-mingled stream of gas from another pipeline that contains a gas blend subject to a blending limit unbeknown to the BB pipeline operator. The existing connection agreements with Jemena’s pipelines contain no obligations for an interconnecting pipeline operator to notify Jemena that it may be injecting any gas blend that is subject to a blending limit, so long as the gas meets the gas specification of the pipelines.</p> <p>Therefore, Jemena requests that AEMO replaces Note 1 or adds another note under clause 10.5 to state:</p> <p><i>A BB blended gas distribution system or a BB pipeline is not considered to be receiving a gas blend from another BB facility unless the said BB facility has notified the BB blended gas distribution system or the BB pipeline about the injection of a gas blend or primary gas that is subject to a blending limit.</i></p> <p>Also, Jemena notes that its current metering and SCADA infrastructure cannot measure the volume concentration of hydrogen in a gas blend without additional investments. Jemena considers that it is not in the long-term interests of gas consumers for Jemena to make such investments for the sole purpose of measuring concentration of hydrogen in circumstances where it has specified a blending limit</p>	

Reference	Submitter	Submission details	AEMO response
		<p>of 0% for hydrogen and has not connected with a hydrogen production or blending facility.</p> <p>Jemena considers that it is consistent with the BB information standard under rule 165 of the NGR for a BB blended gas distribution system or a BB pipeline to only provide gas blend information under rule 190G after it becomes aware of the facts or circumstances that require the gas blend information to be provided to AEMO. Also, absent a reasonable ground to believe that a gas blend subject to a blending limit is being transported via the BB blended gas distribution system or BB pipeline, Jemena considers that an experienced and competent person engaged in the ownership, operation or control of a BB facility of that type, acting with all due skill, diligence, prudence and foresight and in compliance with all applicable legislation, authorisations and industry codes of practice, should not be reasonably expected to procure or maintain specialised equipment necessary to make the measurements required to calculate gas blend information under rule 190G.</p> <p>Proposed amendment:</p> <p><i>Note 1: This reporting obligation applies to BB blended gas distribution systems and BB pipelines that receipt a gas blend from another BB facility (that may a BB pipeline, BB production facility, BB blend processing provider) that injects a primary gas other than natural gas that is subject to a blending level limit.</i></p> <p><i>Additional Note: A BB blended gas distribution system or a BB pipeline is not considered to be receiving a gas blend from another BB facility unless the said BB facility has notified the BB blended gas distribution system or the BB pipeline about the injection of a gas blend or primary gas that is subject to a blending limit.</i></p>	

C.4 BB Aggregation Methodology

Reference	Submitter	Submission details	AEMO response
C.4.1		No comments were received on this document.	

C.5 BB Data Submission Guide

Reference	Submitter	Submission details	AEMO response
C.5.1	AEMO	Amend erroneous fieldname 'RelatedFacilityID' to be 'RelatedFacilityIDs' in section 4.20.1 and B.18.1 to align the documentation with the existing GBB IT system requirements.	This change has been implemented.
C.5.2	AEMO	Amend error in section B23.1 to use consistent field names as specified in section 4.25.1 to rectify this error in the documentation.	This change has been implemented.

C.6 Guide to Gas Bulletin Board Reports

Reference	Submitter	Submission details	AEMO response
C.6.1		No comments were received on this document.	