



Response template for IIR on Gas Bulletin Board changes for Renewable Gas

Email responses to: GWCF_Correspondence@aemo.com.au

Review comments submitted by: *Jemena*

Confidential: No

Date: 30 September 2024

Contact Person: *James Harding (james.harding@jemena.com.au)*

Please complete sections 1, 2 and 3.

Section 1 - General Comments on the Procedure changes

| Topic | Please Provide Response Here |
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| Does your organisation support AEMO's assessment of the proposal? If no, please specify areas in which your organisation disputes AEMO's assessment and include information that supports your organisation's rationale why you do not support AEMO's assessment. | |

Section 2 – Specific Question

| Topic | Please Provide Response Here |
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| 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? | |

Section 3 - Feedback on the documentation changes in the Procedures and Technical Documents

| *** Participants are to complete the relevant columns below in order to record their response. *** | | | |
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| GBB Procedures V13.0 | | | |
| Procedure Clause # | Issue / Comment | Proposed text Red strikeout means delete and blue underline means insert | AEMO Response (AEMO only) |
| 10.5 | <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'.</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 <u>limit</u>.</i></p> <p><i>Additional Note: <u>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.</u></i></p> | |

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| | <p>'Blending limit' is defined in rule 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.</p> <p>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> | | |
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| | <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 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> | | |
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BB Data Aggregation Methodology V1.3

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BB Data Submission Guide V2.1

| Procedure Clause # | Issue / Comment | Proposed text Red strik means delete and <u>blue underline</u> means insert | AEMO Response (AEMO only) |
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| Guide to Gas Bulletin Board Reports V2.3 | | | |
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