



Response template for PPC on GBB Procedures amendments for renewable gas

Email responses to: GWCF_Correspondence@aemo.com.au

Review comments submitted by: APA

Confidential: No

Date: 29/7/24

Contact Person: Beck Mason

Please complete sections 1, 2 and 3.

Section 1 - General Comments on the consultation

Topic	Please Provide Response Here
<p>General Comments</p> <p>Does your organisation support AEMO's assessment of the proposal?</p> <p>If not, 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.</p>	

Section 2 - Specific questions from the consultation

Topic	Please Provide Response Here
Question 1: How should the nameplate capacity of distribution systems, required by Rule 144A, be determined?	
Question 2: How should the blend level, required by Rule 190G, be measured? AEMO is currently advocating the use of a %vol reporting requirement which is consistent with AS/NZS 4645.	

Section 3 - Feedback on the consultation documents

BB Procedures			
Procedure Clause #	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response (AEMO only)
10.5	<p>Thankyou for the opportunity to comment on AEMO's PPC on the GBB Procedure changes to accommodate renewable gases rule change.</p> <p>Whilst APA is supportive of accommodating hydrogen and renewable gases into the National Gas Framework, we do advocate that these obligations apply and be active on BB facilities only when the facility operator has taken a deliberate step to accommodate hydrogen or other renewable gases.</p> <p>APA requests that AEMO provides clarity in section 10.5 Reporting Gas Blend and Gas Blend Curtailment Information that 10.5 of the BB Procedures only comes into effect or is triggered for reporting if or when the BB Pipeline changes to accept or transport a gas blend. This could occur when the respective BB pipeline accepts the connection of:</p> <ul style="list-style-type: none"> • BB blend processing facility; or • BB production facility capable of injecting a primary gas other than natural gas to the BB Pipeline. 		

	<p>The inclusion of this would clarify that the AEMO BB Procedures section 10.5 does not apply for a BB pipeline that is transporting natural gas as a primary gas.</p> <p>This then aligns with APA’s interpretation of the National Gas Law where:</p> <ul style="list-style-type: none"> • Gas blend is defined as <i>gas blend means primary gases that have been blended together</i> • Primary gases is defined as <i>primary gas means the following:</i> <ul style="list-style-type: none"> - <i>Natural gas;</i> - <i>Hydrogen;</i> - <i>Biomethane;</i> - <i>Synthetic methane;</i> - <i>A substance prescribed by the Regulations for the purpose of this definition;</i> - <i>A substance prescribed as a primary gas in a participating jurisdiction by a local regulation of the participating jurisdiction.</i> <p>National Gas Rules 190G (1) states that 190G applies to a BB reporting entity for:</p> <ul style="list-style-type: none"> • a BB blended gas distribution system; or • A BB pipeline that transports a gas blend and is subject to or applies a blending limit. <p>On this basis, APA’s transmission pipelines that are BB Pipelines accommodate natural gas as a primary gas, do not currently accommodate gas blends, nor do they apply a blending limit and therefore should not be captured by this requirement until such time as APA has completed technical assessments, determined a blending limit and directly connected a BB blend processing facility or BB production facility capable of injecting a primary gas other than natural gas into the BB pipeline. This is consistent with National Gas Rules Part 10, 101B(2)(h)(v and vi) which requires a transmission pipeline operator to report via the entity’s website if a service provider has received approval to change the type of gas transported and the gas transported through the pipeline is going to change on an on-going basis.</p>		

BB Aggregation Methodology

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BB Data Submission Guide

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

Guide to gas bulletin board reports

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