



Response template for PPC on GBB Procedures amendments for renewable gas

Email responses to: GWCF_Correspondence@aemo.com.au

Review comments submitted by: *Jemena Limited*

Confidential: No

Date: 29/7/2024

Contact Person: *Catherine Marshall*

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?	Jemena supports option (a), i.e. using the sum of the gate stations nameplate capacities.
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.	<p>Jemena supports using %vol reporting.</p> <p>Jemena is unable to understand the linkage to AS/NZS 4645, in that this standard only uses the 15% volume hydrogen blend as a reference. Note there is currently a proposal under draft to amend this Standard, with an aim to increase the coverage to include distribution systems with 100%. The Standard does not provide any mechanism for reporting or measuring on H2 blend levels.</p> <p>Jemena also understands that AS 4564 is currently being updated.</p>

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	Rule 190G requires a BB reporting entity for a BB pipeline that meets the criteria set out in rule 190G(1)(b) to report information relating to gas blend levels. Jemena is concerned that the operator of a BB pipeline may be unable to determine when the reporting		

	<p>threshold is satisfied if it cannot discern whether the gas it receives from another pipeline is, in fact, a gas blend or not. It is possible that biomethane or synthetic methane could be injected directly into another operator's pipeline which then connects with (and delivers a co-mingled stream of gas into) a Jemena pipeline. However, the existing connection agreements with Jemena's pipelines contain no obligations for the interconnecting pipeline operator to notify Jemena of the composition of gas it injects into a Jemena transmission pipeline so long the gas meets the applicable gas specification. For example, where the applicable gas specification is met, it is impossible for Jemena to distinguish biomethane and synthetic methane from natural gas chemically. To avoid uncertainty about the application of this reporting, Jemena requests that section 10.5 of the Procedures clarify that reporting by a BB pipeline is only required in circumstances where either of the following are directly connected to the BB pipeline:</p> <ul style="list-style-type: none"> • a BB blend processing facility; or • a BB production facility capable of injecting a primary gas other than natural gas. <p>Alternatively, a reference in section 10.5 to the BB reporting entity 'knowingly transporting a gas blend' may help pipeline operators determine whether the reporting obligations apply to them.</p>		
10.5(a)(ii)	While Jemena can report on the number of gas blend curtailment events, it is not in a position to report on the aggregate quantity of gas curtailed (TJ) as it doesn't		

	have visibility of quantity of gas not delivered nor is it in a position to estimate that volume.		
10.5(b)	<p>Jemena has concerns as to how this requirement will be interpreted. Currently primary gases could be blended upstream of city gates or downstream of city gates. If a gas blend is injected downstream of a city gate in a mesh distribution system in small quantities, the overall percentage will be a very small number. If the blending into a downstream part of the distribution system is at (say) 2%, but that stream is only 1% of the total flow through the mesh distribution system, does this mean the percentage to be reported is actually 0.02% (1% x 2%)? (Note this concern could also relate to the blended gas from a very small city gate into a mesh distribution system).</p> <p>Jemena requests that AEMO provides further clarification on what is required here.</p>		
10.5(b)(ii)	<p>Rule 190G (3)(d)(ii) requires information on the average daily blend level across all days in the month. This is covered in 10.5(b)(iii) of the BB Procedures as the BB reporting entity providing information on the average daily blend level. It is unclear if this is intended to be the average of the daily blend level or the total blend level averaged across the month.</p> <p>Jemena requests that AEMO provides further clarification on what is required here.</p>		

BB Aggregation Methodology

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

BB Data Submission Guide

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

Guide to gas bulletin board reports

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