

# GAS DAY HARMONISATION TRANSITION PLAN

PREPARED BY: AEMO Market Change  
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## 1. INTRODUCTION

The COAG Energy Council has approved harmonising gas days, with the Gas Market Reform Group (GMRG) progressing implementation of changes to the National Gas Law (NGL) and the National Gas Rules (NGR) (the rules).

Under the changes, gas day harmonisation means a common gas day start time of 6 am (AEST) across the east coast (and the NT once it becomes connected to the east coast) to apply to the operators of all production, pipeline, compression and storage facilities and the facilitated markets (e.g. the GSH, STTM and retail markets)

Different gas markets across the east coast currently operate with different gas day start times because of legacy pipeline arrangements. These differences impose a cost on the increasingly integrated system. A standard market timetable across all natural gas facilities is expected to support new market arrangements proposed by the Australian Energy Market Commission (AEMC's) East Coast Wholesale Gas Markets and Pipeline Frameworks Review and accepted by the COAG Energy Council in August 2016.

The Gas Market Reform Group (GMRG) has subsequently worked with AEMO, the AEMC, the AER and industry to develop the legislative package to implement these changes. The COAG Energy Council has accepted the recommendations and approved the legislative package in July 2018.

The NGR changes have been made by the South Australian Minister and the NGL changes were enacted by the South Australian Parliament on 22 November 2018.

According to Schedule 5, Part 6, Rule 3 of the amended rule, AEMO is required to publish information on the arrangements it will implement for transitioning to the standard gas day in each of the facilitated markets by 1 April 2019.

As part of the transition process, AEMO will need to amend Wholesale and Retail Market Procedures affected by the change to standard gas days. Market systems must have implemented the use of the new harmonised gas day from 1 October 2019.

This document provides a register of all Wholesale Market Procedures and Retail Market Procedures (RMP) that are affected by the change to a standard gas day as well as identifying the impacted entity. The objective of this plan is to enable a smooth transition to 1 October 2019.

In addition to legislative obligations to implement the standard market timetable, AEMO has been requested by the Chair of the COAG Energy Council to coordinate industry readiness. This will mean AEMO is required to coordinate the industry readiness program on behalf of industry participants to inform requirements as well as identify and assist with the resolution of issues associated with the transition.

### 1.1. Purpose

This document describes the activities that AEMO and Market Participants are required to perform to facilitate successful and smooth transition to the harmonised gas day.

### 1.2. Intended audience

This document is intended for all AEMO and industry gas market stakeholders.

### 1.3. Transition Plan In-Scope

Market transition arrangements are required for the following AEMO departments:

- (a) Settlements

- (b) Prudentials
- (c) Retail Gas Markets (NSW/ACT, QLD and SA)
- (d) Wholesale Gas Markets
- (e) Gas Real Time Operations (RTO)
- (f) Gas Market Monitoring (GMM)

#### 1.4. Transition Plan Out of Scope

The following items have been identified as out of scope for the Transition Plan:

- (a) Victorian Declared Wholesale Gas Market
  - (i) Standard gas day already applies
- (b) Retail market in Victoria
  - (i) standard gas day already applies
- (c) Northern Territory retail market
  - (i) Not a gas market
- (d) Capacity Trading artefacts (which already cater for the standard market timetable)
  - (i) Gas Supply Hub – Capacity Transfer and Auction Procedures
  - (ii) Capacity Auction – Auction Agreement
- (e) Transition plans for Natural Gas Facilities (due by 30 June 2019), including:
  - (i) Natural gas facilities (other than in Western Australia)
  - (ii) Short Term Trading Markets facilities
  - (iii) Distribution and transmission pipelines connected to retail markets
  - (iv) Production and interconnected pipeline facilities connected to Declared Wholesale Gas Market (DWGM)

#### 1.5. Transition Plan Consultation Timeline

The following timeline follows a standard consultation in accordance with Part 3, Division 2 and Rule 8 of the NGR.

Activity	Start	End	Comments/Regulatory
Publish first draft Transition Plan for consultation		13 Dec 2018	NGR Rule 8(2)(a)
Submissions on first consultation	13 Dec 2018	16 Jan 2019	NGR Rule 8(2)(a)(ii)
Prepare summary of submissions and update Transition Plan	17 Jan 2019	11 Feb 2019	
Publish second draft Transition Plan Consultation		12 Feb 2019	NGR Rule 8(2)(d)(iii)
Submissions on second consultation	13 Feb 2019	6 Mar 2019	NGR Rule 8(2)(d)

Activity	Start	End	Comments/Regulatory
Prepare summary of submissions and final Transition Plan	7 Mar 2019	29 Mar 2019	
Publish final Transition Plan		1 Apr 2019	NGR Sch 11 (Transitional) Sch 5 (PCT) Part 6 (Std Mkt Timetable) 3(3)

## 1.6. General Principles for Transition

AEMO has based the gas market arrangements for transition to the gas day harmonisation market timetable on the following general principles and recommends that all facility operators that must transition to the standard gas day use the same principles.

	Principle	Include as transitional in RMP	Include as transitional in STTM Procedures	Include as transitional in Exchange Agreement for GSH
1.	All events for a facility or regulated market that take place occur before 6am 1 Oct 2019 AEST will be based on the gas day that is current at that time for that facility or regulated market.	No	No	No
2.	All events that take place on or after 6am 1 Oct 2019 AEST will be based on the standard gas day.	No	No	No
3.	Gas day 30 Sep 2019 will be shorter than usual a) SA and NSW/ACT 23.5 hours; b) Qld 22 hours	Yes	Possible	Possible
4.	All interval metering data from data provider to regulated markets and users will reflect consumption over the relevant gas day ie: a) Current gas day up to and including 29 September 2019 b) Shorter gas day on 30 September 2019 c) Standard gas day from 1 October 2019	Yes	NA New NGR S369A requires measurement using standard gas day	NA
5.	All metering changes need to be in place by 1 October 2019. This means facility operator Transition Plans will need to accommodate meters which: a) Have not yet converted to measurement of standard gas days a) Have converted to measurement of standard gas day, but which need to continue to report data for the relevant gas day b) Can accommodate a shorter gas day on 30 September 2019	Yes	NA	NA

	Principle	Include as transitional in RMP	Include as transitional in STTM Procedures	Include as transitional in Exchange Agreement for GSH
6.	<p>Transition plans will include regular reporting of the scheduling and completion of meter conversion.</p> <p>a) Schedule conversion for the daily read meters as close as possible to transition date</p>	Yes	Potentially	NA
7.	<p>There will be no change to basic meter reading schedules and routes.</p> <p>a) Basic meter readings are assumed to be at the start of the gas day on which an actual meter reading is obtained</p>	No	NA	NA
8.	<p>Changes to gas days have a negligible impact on Effective Degree Days and meter estimation processes.</p> <p>a) Estimates mostly replaced by actuals</p>	No	NA	NA
9.	<p>Facility operators will manage the impact on Heating Value and Zonal Heating Value determination (if any)</p>	No	NA	NA
10.	<p>All timings that are an offset from a gas day will retain the same offset (e.g. 4.5 hours after the start of a gas day)</p>	No	No	No
11.	<p>The context of specific timings should determine if they are related to a gas day or not:</p> <p>a) Change all timings that are related to the gas day through context (eg data for the previous gas day that is provided by 11am on the next gas day in the NSW/ACT Retail Market Procedures is a 4.5 hour offset from the start of the next gas day)</p> <p>b) No changes to timings that are unrelated to the gas day (eg STTM market schedule variations must be submitted and confirmed by no later than 5pm on seventh day). However, note that this is now 5pm AEST rather than local time.</p> <p>c) Some timings may be related to the gas day, but not change (eg STTM Contingency gas bids and offers for the following gas day must be submitted by 6pm AEST)</p>	No	No	No

## 1.7. References

Gas rules made by the South Australian Minister

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## 2. INDUSTRY READINESS AND COORDINATION

Industry readiness and coordination will involve the following activities,

- (a) Defining approach after transition plans published
- (b) Readiness Reporting in lead up to the transition (self-reporting by natural gas facility operators, consolidated by AEMO)
- (c) Industry cutover plan developed and published by end of August 2019, and updated as required
- (d) Coordination of change

A separate document will be created for industry readiness and coordination.

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### 3. SETTLEMENTS AND PRUDENTIALS

Most Settlements and Prudential activities for STTM and GSH market are not impacted by Gas Day Harmonisation, except for some daily activities as highlighted in the table below.

Market Process – STTM	When (AEST)	Who	GDH (new timing, AEST)
Daily Estimates			
Submit daily CTM data (Brisbane only)	By 12.30 pm	Pipeline Operator	By 10.30AM
Submit STTM daily deemed distribution system allocation (Brisbane only)	By 12.30 pm	Pipeline Operator	By 10.30AM
Submit STTM daily distribution system allocation	SYD/ADL - By 11 am BRI - By 12.30 am	AEMO (as Retail Market Operator)	By 10.30AM
Issue deviation estimates	SYD/ADL - By 12.08 pm BRI - By 1.38 pm	AEMO	By 10.38AM
Issue prudential monitoring information for all hubs	After 2 pm	AEMO	After 12PM
Preliminary Settlement for all hubs			
Submit STTM facility allocations for Preliminary settlement run	By 3 <sup>rd</sup> business day after the end of the billing period	Allocation Agents (for Pipeline Operators)	No change
Submit MOS price step allocations for Preliminary settlement run	By 3 <sup>rd</sup> business day after the end of the billing period	Allocation Agents (for Pipeline Operators)	No change
Submit CTM data (Brisbane only) for Preliminary settlement run	By 4 <sup>th</sup> business day after the end of the billing period	Pipeline Operator	No change
Submit STTM deemed distribution system allocations (Brisbane only) for Preliminary settlement run	By 4 <sup>th</sup> business day after the end of the billing period	Pipeline Operator	No change
Submit STTM distribution system allocation for Preliminary settlement run	By 4 <sup>th</sup> business day after the end of the billing period	AEMO (as Retail Market Operator)	No change
Issue preliminary settlement statements	By 7 <sup>th</sup> business day after the end of the billing period	AEMO	No change
Final Settlement for all hubs			
Submit STTM facility allocations for Final settlement run	By 14 <sup>th</sup> business day after the end of the billing period	Allocation Agents (for Pipeline Operators)	No change

Market Process – STTM	When (AEST)	Who	GDH (new timing, AEST)
Submit MOS price step allocations for Final settlement run	By 14th business day after the end of the billing period	Allocation Agents (for Pipeline Operators)	No change
Submit CTM data (Brisbane only) for Preliminary settlement run	By 15th business day after the end of the billing period	Pipeline Operator	No change
Submit STTM deemed distribution system allocations (Brisbane only) for Final settlement run	By 15th business day after the end of the billing period	Pipeline Operator	No change
Submit STTM distribution system allocation for Final settlement run	By 15th business day after the end of the billing period	AEMO (as Retail Market Operator)	No change
Issue final settlement statements / invoices	By 18th business day after the end of the billing period	AEMO	No change
Payment Date for all hubs			
Make payment to AEMO	By 12 noon on the 20th business day after the end of the billing period	Trading Participants	No change
AEMO makes payment to Market Participants	By 2pm on the 20th business day after the end of the billing period	AEMO	No change
Revision Settlement for all hubs			
Submit STTM facility allocations for Revision settlement run	By 1st business day after the end of the 9th billing period	Allocation Agents (for Pipeline Operators)	No change
Submit MOS price step allocations for Revision settlement run	By 1st business day after the end of the 9th billing period	Allocation Agents (for Pipeline Operators)	No change
Submit CTM data (Brisbane only) for Revision settlement run	By 2nd business day after the end of the billing period	Pipeline Operator	No change
Submit STTM deemed distribution system allocations (Brisbane only) for Revision settlement run	By 2nd business day after the end of the billing period	Pipeline Operator	No change
Submit STTM distribution system allocation for Revision settlement run	By 2nd business day after the end of the billing period	AEMO (as Retail Market Operator)	No change

Market Process – STTM	When (AEST)	Who	GDH (new timing, AEST)
Issue settlement revision	On the 5th business day after the end of the 9th billing period	AEMO	No change

Market Process – Gas Supply Hub	When (current)	Who	GDH (new)
Daily settlement			
Determine the Actual Delivered Quantity based on data provided by the relevant pipeline operator or gas producer	From the end of the delivery gas day	Participants	No change
Provide AEMO with actual gas delivery information	From the end of the delivery gas day	Participants	No change
Prepare estimate of settlement amounts	Each business day	AEMO	No change
Report settlement amount and quantities to participants via market report	Each business day	AEMO	No change
Monthly Settlement			
Provide AEMO with actual gas delivery information	By 9 am on the 14th business day after the end of the billing period	Participants	No change
Submit and confirm Reallocation requests	By 9 am on the 14th business day after the end of the billing period	Participants	No change
Issue Final Settlement Statement	By 15th business day after the end of the billing period	AEMO	No change
Payment Date			
Make payment to AEMO	By 12 noon on the 20th business day after the end of the billing period	Trading Participants	No change
AEMO makes payment to Market Participants	By 2 pm on the 20th business day after the end of the billing period	AEMO	No change

Market Process – Gas Supply Hub	When (current)	Who	GDH (new)
Revision Settlement			
Provide AEMO with updated information for a revised statement	By 9 am on the 1st business day of the 4th billing period after the settled billing period	Participants	No change
Issue a Revised Settlement Statement	By 2nd business day of the 4th billing period after the settled billing period	AEMO	No change

The transitional activities for Settlements and Prudentials are as follows:

Activity 1.
Internal System Scheduler Application
Responsibility: AEMO IT
Change timing for internal scheduled batch jobs (SABS) related to Settlements and Prudentials

#### 4. RETAIL GAS MARKETS

According to Schedule 5, Part 6, Rule 3 of the amended rule, the impacted retail regulated gas markets are Queensland (QLD), South Australia (SA) and New South Wales/ Australian Capital Territory (NSW/ACT)

From a Retail Market perspective, the main business processes that will be impacted by the Gas Day Harmonisation is the provision of interval metering information and consultation process for the transitional Retail Market Procedures (RMP) to provide the regulatory relief for the shorter gas day on 30 September 2019. Specifically, they involve the following:

- (a) Two stage effort required by market participant to configure interval meter information for,
  - (i) Transitional shorter gas day on 30 September 2019 to align with transitional RMP
  - (ii) Standard gas day from 1 October 2019 to align with RMP based on new NGR
- (b) AEMO will develop the transitional RMP to provide regulatory relief to the Participants for the shorter gas day on 30 September 2019. The details of shorter gas day in each of the impacted market is as follows:
  - (i) For QLD the gas day will be defined as a period of 22 consecutive hours beginning at 8:00 am
  - (ii) For NSW/ACT the gas day will be defined as a period of 23.5 consecutive hours beginning at 6:30 am
  - (iii) For SA the gas day will be defined as a 23.5 hour period starting at 06:00 hours on a day and ending at 05:30 hours on the following day

A Proposed Procedure Change (PPC) containing the transitional RMP changes will be published by early April 2019 with a Notice of Decision (NoD) published by end of June 2019.

No change to the business processes pertaining to the following:

- (a) Transfers
- (b) Service Orders
- (c) MIRN Discovery
- (d) Update Site Access Information
- (e) Route Site Information
- (f) Retail of Last Resort (RoLR)
- (g) Updating Customer Details
- (h) Network Billing
- (i) Provision of Basic Metering Information

##### Activity 1.

Configure Internal Meter Information for Transitional Gas Day

Responsibility: Market Participant

Configure interval meter information for transitional gas day on 30 September 2019

Activity 2.

Configure Internal Meter Information for Standard Gas Day

Responsibility: Market Participant

Configure interval meter information for standard gas day on 1 October 2019

Activity 3.

Develop Transitional RMP to Provide Regulatory Relief

Responsibility: AEMO

Develop transitional RMP to provide regulatory relief for NSW/ACT

Activity 4.

Develop Transitional RMP to Provide Regulatory Relief

Responsibility: AEMO

Develop transitional RMP to provide regulatory relief for QLD

Activity 5.

Develop Transitional RMP to Provide Regulatory Relief

Responsibility: AEMO

Develop transitional RMP to provide regulatory relief for SA

Activity 6.

Determine and Submit Daily Distribution System Allocation

Responsibility: AEMO

Determine and submit daily distribution system allocation to the STTM system no later than 4.5 hours after the start of the gas day in accordance with NGR 422 (for NSW/ACT, QLD and SA)

Activity 7.

Provision of Energy Data to AEMO (NSW/ACT)

Responsibility: Network Operator

To provide daily metering data to AEMO no later than 3 hours after the start of the gas day in accordance with NSW/ACT RMP

Activity 8.

Provision of Energy Data to AEMO (QLD)

Responsibility: Distributor

To provide daily metering data to AEMO no later than 3.5 hours after the start of the gas day in accordance with QLD RMP

Activity 9.

Pipeline Operators to Provide Physical Gate Point Metering Data (SA)

Responsibility: Pipeline Operator

To provide physical gate point metering data to the Network Operator no later than 2.5 hours after the end of the gas day in accordance with SA RMP

Activity 10.

Network Operator to Provide Gate Point Metering Data to AEMO for Each Gate Point (SA)

Responsibility: Network Operator

To provide physical gate point metering data to AEMO no later than 3.5 hours after the end of the gas day in accordance with SA RMP

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## 5. WHOLESALE GAS MARKETS

The transition activities for the wholesale gas market are as follows.

### Activity 1.

Update GSH Exchange Agreement

Responsibility: AEMO

Update GSH Exchange Agreement to cover for short gas day on 30 September 2019 and standard gas day from 1 October 2019.

### Activity 2.

MIBB user guide and STTM reports specification

Responsibility: AEMO

Update report timings to reflect changes required for standard gas day.

### Activity 3.

Update STTM guides and training material

Responsibility: AEMO

Update training material, Industry Guide to STTM, Technical Guide to STTM and Overview of the STTM.

## 6. GAS REAL TIME OPERATIONS / GAS MARKET MONITORING (GMM)

The market processes listed below are in addition to the Settlement and Prudential timelines changes, outlined in Section Error! Reference source not found.. Daily STTM facility allocations (pipeline allocations and MOS step allocations), bid/off submissions and schedule publication times will be updated:

Most of GMM activities are not impacted by Gas Day Harmonisation.

Wholesale gas market transition activities also involve amending some of the impacted documents and guides owned by GMM.

Market Process – STTM	When (AEST)	Who	GDH (new timing, AEST)
Submit STTM daily facility allocations (PAD)	SYD/ADL - By 11:00 BRI - By 12.30	Allocation Agents (for Pipeline Operators)	By 10.30
Submit STTM daily MOS price step allocations (MSD)	SYD/ADL - By 11:00 BRI - By 12.30	Allocation Agents (for Pipeline Operators)	By 10.30
Publication of Ex-post schedule	SYD/ADL - By 12:00 BRI - By 13.30	AEMO	By 10:30
Submit Ex-ante bid/offer	SYD/ADL - By 12:00 BRI - By 13:30	Trading Participants	By 11:30
Publication of Ex-ante schedule	SYD/ADL - By 13:00 BRI - By 14:30	AEMO	By 12:30
Submit Provisional (D-2, D-3) bid/offers	SYD/ADL - By 14:00 BRI - By 15:30	Trading Participants	By 13:30
Publication of Provisional schedule	SYD/ADL - By 15:00 BRI - By 16:30	AEMO	By 14:30
Publication of delayed Ex-post (PPOST)	SYD/ADL - By 16:00 BRI - By 17:30	AEMO	By 15:30
Submit Contingency Gas bids/offers	SYD/ADL - By 18:00 BRI - By 18:00	Trading Participants	No change

### Activity 1.

Update Longford meter accreditations (DWGM)

Responsibility: Market Participants

Ensure meter accreditations at Longford 30000001PC are updated to reflect day light savings flag to 'N', 3 gas days before 1 October 2019

Activity 2.

Publishing of STTM Schedules

Responsibility: AEMO

Ensure Ex-post (by 11:30), Ex-ante (by 12:30), Provisional (by 14:30) and Provisional ex-post (PPOST by 15:30) schedules are published as per times required by NGR for all hubs.

Activity 3.

Changes to MIS Report publication timings

Responsibility: AEMO

Refer to *STTM Interface Protocol artefacts - STTM Reports Specification* consultation pack for details on impacted reports, and updated publication times

Activity 4.

Internal System Scheduler Application

Responsibility: AEMO IT

Change timing for internal scheduled batch jobs related to Gas RTO and GMM

Activity 5.

Submit Files

Responsibility: Market Participant

Submit PAD / MSD / NAD files by 10:30 hours

Activity 6.

Submit Files

Responsibility: Market Participant

Submit Facility Hub Capacity (FHC) file by 9:00 hours

Activity 7.

Configure file generation for allocation files for Transitional Gas Day

Responsibility: Facility Operator

Configure allocation information for transitional gas day on 30 September 2019, for submissions on 1 October 2019.

Activity 8.

Timing of submission for Provisional and XANTE bid/offer

Responsibility: Market Participant

XANTE Bid/offer submissions by 11:30 hours

Provisional (Day – 2 and Day - 3) bid/offer submissions by 13:30 hours