



Response template for PPC on DWGM Procedure changes for Hydrogen and DCF Rule Changes

Email responses to: GWCF_Correspondence@aemo.com.au

Review comments submitted by: Red Energy and Lumo Energy

Confidential: No

Date: 16/Oct/2023

Contact Person: Sean Jennings

Please complete sections 1 and 2.

Section 1 - General Comments on the Procedure changes

Topic	Please Provide Response Here
General Comments Does your organisation support AEMO's assessment of the proposal? If no, 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 why you do not support AEMO's assessment.	Red Energy and Lumo Energy support the assessment of the proposal, with minor amendments provided below.
Wholesale Market Connection Approval Procedures	
Wholesale Market Distribution Procedures, which include: <ul style="list-style-type: none">- Distribution Operational Coordination Procedure- Net Bidding Procedures	

Wholesale Market Gas Quality Procedures	
Wholesale Market Maintenance Planning Procedures	
Wholesale Market Management Procedures, which include: <ul style="list-style-type: none"> - Additional Reporting Procedures - Electronic Communication Procedures - Gas Ownership Rules - Rule Consultation Procedures 	
Wholesale Market Metering Procedures, which include: <ul style="list-style-type: none"> - Metering Uncertainty Limits and Calibration Requirements Procedures - Energy Calculation Procedures - Metering Communications Procedures - Installation Database Procedures - Metering Installation Coordination Procedures - Metering Register Procedures - Data Validation Procedures 	
Wholesale Market Operation Procedures, which include: <ul style="list-style-type: none"> - Accreditation Procedures - Administered Pricing Procedures - Capacity Auction Procedures - Capacity Trading Procedures - LNG Reserve Procedures - Gas Scheduling Procedures 	Red and Lumo request clarification on the head of power under which “AEMO may request at any time additional information from Registered participants by notice in writing for the purpose of system capability modelling including...” This doesn’t appear to reflect NGR 324 which identifies what participants are required to provide.

<p>Wholesale Market Settlement Procedures, which include:</p> <ul style="list-style-type: none"> - Ancillary Payment Procedures - Uplift Payment Procedures - Compensation Procedures - DUAFG Procedures 	
<p>Wholesale Market System Security Procedures</p>	<p>Red and Lumo request clarification of the linepack zones and whether they actually align to the WZ or only 'broadly align with the WZ' as suggested?</p>

Section 2 – Specific Questions from PPC

Topic	Please Provide Response Here
<p>Question 1: Do participants consider the 5TJ/d constraint materiality threshold for inclusion of a constraint in the scheduling window? For the avoidance of doubt, this proposal applies to distribution connected facilities (under the distribution operational coordination procedure) and to DTS connected facilities (under the gas scheduling procedures).</p>	<p>Red and Lumo consider 5TJ/day an appropriate threshold.</p>
<p>Question 2: Do participants consider the 5TJ/d constraint materiality threshold for sending a SWN is appropriate as AEMO already publishes all constraints at schedule approval? For the avoidance of doubt, this proposal applies to distribution connected facilities (under the distribution operational coordination procedure) and to DTS connected facilities (under the gas scheduling procedures).</p>	<p>Red and Lumo support the 5TJ/d threshold for SWN as it ensures participants are not provided with notifications below a level relevant to the market.</p>
<p>Question 4: Do Registered Participants agree that a 3 monthly communication limit is appropriate for routine notifications concerning Responsible Persons notifications under rules? If not please nominate an alternate time frame (including a justification) for routine communications?</p>	

Section 3 - Feedback on the documentation changes in the Procedures

*****Participants are to complete the relevant columns below in order to record their response.*****

Wholesale Market Connection Approval Procedures

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

Wholesale Market Distribution Procedures (including Distribution Operation Coordination Procedures and Net Bidding Facility Procedures)

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

Wholesale Market Gas Quality Procedures

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

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

Wholesale Market Management Procedures (including Additional Reporting Procedures, Electronic Communication Procedures, Gas Ownership Rules Procedure and Rule Change Consultation Procedures)

Procedure Clause #	Issue / Comment	Proposed text Red strikeout means delete and blue <u>underline</u> means insert	AEMO Response (AEMO only)
1.6. Technical Documents - Table 3 Related Technical Documents	Red and Lumo observe that the hyperlink for the DWGM Build Pack link is incorrect - leading to the pipeline capacity trading policies and guidelines page rather than the 'Procedures, policies and guides' page under Technical Documents. The User Guide to MIBB Reports link also appears to be incorrect - leading to the market portals directory page rather than the 'Procedures, policies and guides' page.	https://www.aemo.com.au/energysystems/gas/pipeline-capacity-trading/pct/procedures-policies-and-guides https://www.aemo.com.au/energysystems/market-portalsdirectory/markets-portal-help https://aemo.com.au/energy-systems/gas/declared-wholesale-gas-market-dwgm/procedures-policies-and-guides	
3.3.2. Electronic Communication System Technical Documents - Table 5 Technical Documents	Red and Lumo observe that the hyperlink for the User Guide to MIBB Reports link is incorrect - leading to the market portals directory page rather than the 'Procedures, policies and guides' page.	https://www.aemo.com.au/energysystems/market-portalsdirectory/markets-portal-help https://aemo.com.au/energy-systems/gas/declared-wholesale-gas-market-dwgm/procedures-policies-and-guides	

Wholesale Market Metering Procedures (including the Metering Uncertainty Limits and Calibration Requirements Procedures, Energy Calculation Procedures, Metering Communications Procedures, Installation Database Procedures, Metering Installation Coordination Procedures, Metering Register Procedures and Data Validation Procedures)

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

Wholesale Market Operation Procedures (including the Accreditation Procedures, Administered Pricing Procedures, Capacity Certificate Auction Procedures, Capacity Certificate Trading Procedures, LNG Reserve Procedure and Gas Scheduling Procedures)

Procedure Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
4.9.2. Modelling information	<p>Red and Lumo request clarification on the head of power under which "<i>AEMO may request at any time additional information from Registered participants by notice in writing for the purpose of system capability modelling including</i>"</p> <p>This doesn't appear to reflect NGR 324 which identifies what participants are required to provide.</p>		

Wholesale Market Settlements Procedures (Including the Ancillary Payment Procedures, Uplift Payment Procedures, Compensation Procedures and DUAFG Procedures)

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

Wholesale Market System Security Procedures

Procedure Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
2.1. Declared transmission system overview	<p>Red and Lumo request clarification of the linepack zones and whether they do actually align to the WZ or only 'broadly' align with the WZ' as suggested?</p> <p>The Glossary defines Linepack as 'The amount of energy in the gas stored in the declared transmission system' and since the DTS is bounded by the WZ, it would follow that the WZ define the linepack zones, rather than 'broadly'.</p>	The linepack zones within the DTS include the Gippsland, Melbourne, Geelong, Ballarat and Northern zones, and broadly align to the WZs described in Table 4.	

Attachment D - DWGM - Technical Specification

INT Report	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response (AEMO only)
INT139			
INT139A			
INT188			
INT140			
INT1176			
INT240			
INT241			