

1 March 2019 .

Notice to all Registered Participants under the National Gas Rules (NGR).

This Notice is to advise Participants on AEMO's decision to approve amendments to the:

- Queensland (QLD) Retail Market Procedures (RMP);
- New South Wales and Australian Capital Territory (NSW/ACT) RMP;
- NSW/ACT Participant Build Pack 5 (PBP5); and
- South Australian (SA) RMP.

This Notice advises Gas Market Registered Participants that consultation under the ordinary Procedure Change Consultative Process prescribed under Rule 135EE of the NGR concluded on 11 February 2019 for:

- IN002/16 (Proposed changes to the jurisdictional RMP and STTM Procedure in light of the NGR change to harmonise the gas day)

As required under Rule 135EE of the NGR, Gas Market Registered Participants and other interested parties were invited to submit comments to AEMO on the Impact and Implementation Report (IIR). This IIR noted there would be changes to RMP but no changes to Short Term Trading Market (STTM) Procedures.

Attachment E of this Notice sets out the consolidated feedback relating to the RMPs and PBP5 that AEMO received during this consultation phase. These documents include stakeholder comments, AEMO responses and, based on those responses, indicate where respondent feedback resulted in further amendment to the documents mentioned above. None of the respondents to the consultation opposed the broad principle of this proposal.

Having considered the feedback provided by each respondent, AEMO has approved the proposed amendments (Attachments A to D) of this Notice and has set the effective date for the changes to be <u>6.00 am AEST on 1 October 2019.</u>

Updated versions of the RMPs and PBP5 pertaining to the changes described in Attachments A to D will be published on the AEMO website prior to the effective date.

Should you require any further information please contact Danny McGowan on (03) 9609 8447.

ATTACHMENT A Proposed changes: Retail Market Procedures – QLD Red strikeout means delete and blue underline means insert

1.1.1 Definitions

gas day

a period of 24 consecutive hours starting at the same time as a standard gas day as defined in Part 26 of the *Rules*. A period of 24 consecutive hours beginning at 8:00 am.

ATTACHMENT B Proposed changes: Retail Market Procedures – NSW/ACT Red strikeout means delete and blue underline means insert

1.2.1 Definitions

gas day <u>a period of 24 consecutive hours starting at the same time as a</u> <u>standard gas day as defined in Part 26 of the Rules. A period of 24</u> consecutive hours beginning at 6:30 am.

3.1.5 Definitions

(a) for daily metered delivery points - at the start of each 6.30 am each gas day;

3.6.6 Provision of Energy Data to AEMO

- (c) In respect of daily metered delivery points, the Network Operator must:
 - (i) if the *delivery point* is on an STTM network section, use reasonable endeavours to provide the data specified in paragraph (b) by 9.309:00 am on the day of the *meter read*; or
- 7.2.1 Cancellation and Acceleration of Customer Transfers.
- (a) Where a *RoLR event* has occurred, *AEMO* must take the following actions in relation to any pending *transfer request* in respect of a *delivery point* involving a *failed retailer*.
 - (i) where the *failed retailer* is the *prospective FRO* who submitted the *transfer request*, cancel the *transfer request* and deliver notice of that cancellation to the *FRO*, the *failed retailer* and the *Network Operator* for the *delivery point* by 6.300 am on the *RoLR transfer date*;
 - (ii) where the failed retailer is the current FRO for the delivery point and the transfer request contains a Customer no-change statement, accelerate the transfer request and deliver notice of registration of the transfer to the prospective FRO, the failed retailer and the Network Operator for the delivery point by 6.300 am on the RoLR transfer date;
 - (iii) where the *failed retailer* is the current *FRO* for the *delivery point* and the *transfer* request does not contain a *Customer no-change statement*.
 - (A) if the prospective transfer date is not more than 10 days after from the RoLR transfer date, accelerate the transfer request and deliver notice of registration of the transfer to the prospective FRO, the failed retailer and the Network Operator for the delivery point by 6.300 am on the RoLR transfer date; or
 - (B) if the prospective transfer date is more than 10 days after the RoLR transfer date, allow the transfer request to progress in accordance with Chapter 6 and include the delivery point in the transfer process under clause 7.2.2.

- (b) Where a *RoLR event* has occurred, *AEMO* must take the following actions in relation to any pending *transfer error correction request* in respect of a *delivery point* involving a *failed retailer*.
 - where the failed retailer submitted the transfer error correction request, cancel the transfer error correction request and deliver notice of that cancellation to the FRO, the failed retailer and the Network Operator for the delivery point by 6.0030 am on the RoLR transfer date;
 - (ii) where the failed retailer is the affected FRO, accelerate the transfer error correction request and deliver notice of registration of the transfer to the User who submitted that request, the failed retailer and the Network Operator for the delivery point by 6.0030 am on the RoLR transfer date;

8.11.9 STTM Distribution System Allocation - Daily Calculation

By 11.00 am on gas day +1, AEMO must calculate, for each User in a network section, the STTM distribution system allocation for the gas day in accordance with rule 422 of the Rules.

A2.3 Calculation of EDD.

(a) Purpose of Effective Degree Day

Effective degree days are required for the calculation of the sensitivity factor. The effective degree day is used to measure coldness which is directly related to gas demand for area heating. The effective degree day is a composite measure of weather coldness incorporating the effect of temperature, wind, sunshine and day of the year.

(b) Calculation for NSW

(i) The effective degree day (EDD) for NSW is calculated as follows:

EDD = DD (temperature effect)

- + 0.0092 x DD x average wind (wind chill factor)
- 0.0628 x sunshine hours (warming effect of sunshine)
- + 5.0805 x Cos ((2π(day-198)) / 365) (seasonal factor)

Where:

- · EDD is the effective degree day;
- DD is the degree day and is described in paragraph (ii);
- average wind is described in paragraph (iii);
- · sunshine hours is described in paragraph (iv);
- Cos is cosine and is described in paragraph (v); and.
- day is the day number of a calendar year where 1st January is 1.

EDD will be 0 if the calculated value is negative.

(ii) The degree day (DD) is calculated as follows:

DD = 21.0578 – T if T < 21.0578 0 if T ≥ 21.0578

Where:

- DD is degree day;
- T is the average of 8 three-hourly Sydney temperature readings (in degrees Celsius) from 3.00am to midnight inclusive as measured at the Sydney Airport Weather Station (Location ID 66037);

Note: The gas day is defined as 6:300am day-1 to 6:300am AEST day+0 so the effective degree day formula implies a 3.5 hour lag in demand to changes in ambient temperature.

(c) Calculation for ACT

- (i) The effective degree day (EDD) for ACT is calculated as follows:
 - EDD = DD (temperature effect)
 - + 0.0163 x DD x average wind (wind chill factor)
 - 0.1326 x sunshine hours (warming effect of sunshine)
 - + 3.1277 x Cos ((2π(day-195)) / 365) (seasonal factor)

Where:

- · EDD is the effective degree day;
- · DD is the degree day and is described in paragraph (ii);
- average wind is described in paragraph (iii);
- · sunshine hours is described in paragraph (iv); and
- · day is the day number of a calendar year where 1st January is 1
- Cos is cosine and is described in paragraph (v).

EDD will be 0 if the calculated value is negative.

(ii) The degree day (DD) is calculated as follows:

DD = 14.6057 – T if T < 14.6057 0 if T ≥ 14.6057

Where:

- DD is degree day;
- T is the average of 8 three-hourly Canberra temperature readings (in degrees Celsius) from 3.00am to midnight inclusive as measured at Canberra Airport (Location ID 70351);

Note: The gas day is defined as 6:300am day-0 to 6:030am AEST day+0 so the effective degree day formula implies a 3.5 hour lag in demand to changes in ambient temperature.

ATTACHMENT C Proposed changes: Participant Build Pack 5 – NSW/ACT Red strikeout means delete and blue underline means insert

6.7.4 ERFTParticipantCLPandUAGNotification

ASEXML TRANSACTION	TRANSAG	CTION TABLE
Transaction Name	Ref No	Transaction Type
ParticipantCLPandUAGNotification	2020	Wholesale

TRANSACTION DEFINITION TABLE CROSS-REFERENCE	THIS INTERFACE REALISES THE FOLLOWING TRANSACTIONS FROM THE TRANSACTION DEFINITION TABLE: 2020 – ERFTParticipantCLPandUAGNotification				
Trigger					
	Time Daily, 09:300 AEST				
Pre-conditions	N/A				
Post-conditions	ERFTDailyToSTTMRpt				
Transaction acknowledgment specific event codes					

The ERFTParticipantCLPandUAGNotification transaction transfers the CLP and UAG quantities, for each Retailer in each Network section, from the Distributor to AEMO.

6.7.5 ERFTMatchedAllocationsDataNotification

ASEXML TRANSACTION	TRANSACTION TABLE	
Transaction Name	Ref No	Transaction Type
MatchedAllocationsDataNotification	2025	Wholesale

TRANSACTION DEFINITION TABLE CROSS-REFERENCE	THIS INTERFACE REALISES THE FOLLOWING TRANSACTIONS FROM THE TRANSACTION DEFINITION TABLE: 2025 – ERFTMatchedAllocationsDataNotification				
Trigger					
	Time	Daily, 09: <u>0</u> 30, AEST]		
Pre-conditions	N/A				
Post-conditions	ERFTDailyToSTTMReport				
Transaction acknowledgment specific event codes					

6.8.2.1 ERFTSTTMPipelineAllocationDataRpt (T2235)

This interface is described in section 4.5.1 (INT772 – Aggregate Pipeline Allocation) of the STTM RMO Interface Specification (version 2).

This report contains information on the aggregate allocation quantity in Mega Joules (To be converted from Giga Joules in the STTM systems) per day for all the STTM facilities (incl. pipelines, storage facilities, production facilities) supplying each STTM hub to the RMO. The allocation quantity will be aggregated at the facility level for each facility at each STTM hub. The aggregate allocation quantity is the net flow of gas to the hub on the STTM facilities that supply the hub.

This report is made available only to RMO and generated for each hub in the market.

Access : RMO

Issued By : 11:00 Daily 10:30 Daily

Report Period : Every pipeline allocation record for each hub where at least one pipeline allocation record for a facility associated with that hub has been updated in the 3 days prior to the report date.

Trigger : Time

Output Filename :

int772_v[n]_aggregate_pipeline_allocation_rpt_[pid]~yyyymmddhhmmss

Column Name	Not Null	Primary Key	Comment
gas_date	True	True	STTM gas day for which the allocation data relates.
Network_identifier	True	True	RMO System's Network Identifier for the hub to which the allocation data relates.

ATTACHMENT D Proposed changes: Retail Market Procedures – SA Red strikeout means delete and blue underline means insert

2. Definitions

"gas day" a period of 24 consecutive hours starting at the same time as a standard gas day as defined in Part 26 of the National Gas Rules. means the 24 hour period starting at 0600 hours on a day and ending at 0600 hours on the following day.

6A. Time under these Procedures

- (2) A reference in these Procedures:
 - (a) as to "gas day":
 - a reference in these *Procedures* to a day or date is a reference to the *gas day* commencing on the day or date referred to, and ending on the following day or date; and
 - (ii) references to months, quarters and years are to be given a corresponding meaning; and
 - (iii) in reckoning periods of months, quarters and years, the 6 or 8 hour offset between months, quarters and years reckoned under clause 6A(2)(a)(ii) and calendar months, quarters and years, is to be disregarded; and
 - (b) to "0000 hours" on a day is to midnight at the start of the day in South Australia; and
 - (c) to "2400 hours" on a day is to midnight at the end of the day in South Australia; and
 - (d) There is no clause 6A (2) (d). to a time-under these Procedures:
 - (i) except for the purposes of clauses 142, 151, 152, 158 and the entirety of Chapter 5, is a reference to the local time or business day in South Australia, being Central Standard Time (being Greenwich Mean Time plus 9.5 hours), adjusted for daylight savings in accordance with the Daylight Savings Act 1971 (SA); and
 - (ii)(i) for the purposes of clauses 142, 151, 152, 158 and the entirety of Chapter 5, is a reference to the local time or business day in South Australia, being Eastern Standard Time (being Greenwich Mean Time plus 10 hours).

to a 24 hour period, includes a period adjusted for daylight savings as agreed between AEMO and the persons required to comply with these *Procedures* in South Australia, such that whether it is the start or end of the daylight savings period, it includes a period of 23 and 25 hours respectively.

{Note: only the clauses referred to under clause 6A(d) operate on EST and are excluded from daylight savings. All other clauses are to operate on local or CST and are adjusted for daylight savings. The purpose for the distinction in timing detailed in clause 6A(d) is to align the timing provisions in the Procedures with the requirements under the STTM, which operate on EST and exclude daylight savings.}

(e)

ATTACHMENT E Submissions received for change IN002-16

Consolidated feedback for IN002/16 – IR (Gas Day Harmonisation)

Section 1 - General Comments on the Proposed Procedure Change

Topic	Item#	Who	Response Received	AEMO response
Sections 1 to 4 of the IR sets out <u>AEMOs critical</u> <u>examination of the proposal</u> . Does your organisation supports AEMO's	1	AGL	AGL believes that the assessment has been appropriate. Comments on the proposed changes are included below.	AEMO notes AGL's response that the assessment has been appropriate.
examination of the proposal?	2	Origin Energy	Origin is supportive of AEMO's examination of this proposal.	AEMO notes Origin's support of this proposal.
If no, please specify areas in which your organisation disputes AEMO examination proposal and include information that supports your organisation rational why you do not support AEMO examination.	3	Jemena Gas Networks & Jemena on behalf of Evoenergy.	Yes, Jemena accepts AEMO's examination of the proposal set out in the IIR.	AEMO notes Jemena's acceptances of AEMO's examination.
Sections 5 to 9 of the IIR sets out <u>AEMO's</u> <u>assessment of likely effect of proposal.</u> Does your organisation supports AEMO's assessment of likely effect of proposal.?	4	AGL	AGL broadly accepts the proposed changed and has provided feedback on the items below. See below for comments.	AEMO notes AGL's broad acceptance.
If no, please specify areas in which your organisation disputes AEMO assessment of the likely effect of the proposal and include	5	Origin Energy	Origin is supportive of AEMO's assessment of likely effect of the proposal.	AEMO notes Origin's acceptance.

information that supports your organisation rational why you do not support AEMO assessment.			Origin acknowledges the comments by APA with regards to meter data delivery timeframes. We note and accept AEMO's assessment and position on this. Origin recommends if AEMO's stance was to change on this matter that participants are accordingly consulted.	
	6	Jemena Gas Networks & Jemena on behalf of Evoenergy.	Yes, Jemena accepts	AEMO notes Jemena's acceptance.
Section 10 of the IIR set out <u>AEMOs</u> <u>recommendation</u> .	7	AGL	AGL supports the recommendation per comments below.	AEMO notes AGL's support to recommend change set out in the IIR.
Does your organisation supports AEMO position to recommend the procedures changes?	8	Origin Energy	Origin is supportive of AEMO's recommendation.	AEMO notes Origin's support to recommend change set out in the IIR.
	9	Jemena Gas Networks & Jemena on behalf of Evoenergy.	Yes, Jemena supports recommendation.	AEMO notes Jemena's support to recommend change set out in the IIR.

10	AGL	AGL notes that the changes in	AGL may have overlooked that
		the supplied pdfs were not easily	section 3 of the IIR provided
		located (ie there was no	details what clause number
		markings on the page border),	contained the changes. AEMO
		requiring substantial time to	believes this is enough
		locate each change for review.	information to locate marked up
		AGL suggests that if border	changes therefor referencing
		marks cannot be used, then a	page numbers not required.
		page listing would make the	
		process more efficient.	

Secti	on 2 - Feedbacl				
Ref 1	L - Retail Market				
#	Participant	Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response
11	AGL	CI 6.2.2 (e2)	Does this clause need to be highlighted?		AGL's feedback is unrelated to this consultation, however because it is inconsequential, AEMO will remove the gray highlight.
12	AGL	CI 6.3.1	Has there been any consideration of the impact on as User's aggregated consumption for a gas day when the interval meters are time shifted in preparation for the 1 October gas day.		As noted in last page of attachment A of the second draft of the Gas Day Harmonisation Transition Plan, AEMO will scope out a study of the impact of changing to the standard gas.
			Ie the calculation will work, but there will be an allocation of gas from the previous gas day into the current gas day. This allocation will increase as the number of interval meters are time shifted		

Section 2 - Feedback on the documentation changes described in Attachment A to C of the IIR.

			prior to 1 October and will impact host allocations.		
13	AGL	CI 10.1.1	This clause requires cancellation of actions prior to 6 am when the gas day started at 8 am. AGL recommends that this time be moved back 2 hours to keep the offset from the start of the gas day consistent and be referenced to the start of the gas day	Suggest the following change 1. 10.1.1 Cancelled and Accelerated Customer Transfers AEMO must before 6am no later than 2 hours prior to the start of the gas day on the RoLR transfer date, in relation to a lodged or pending transfer request:	AEMO does not support. When the QLD RoLR provisions were being consulted on, AEMO proposed that the timing provision prescribed in VIC procedures should be used which is 6am. Victoria's gas day is start at 6am so there is no justification to change this timing to 4am.

Ref	Ref 2 - Retail Market Procedures (NSW and ACT)								
#	Participant	Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response				
14	AGL	various	Consistency through procedures. the definition of the gas day has been changed to a reference to section 26, which in turn sets	Change By 6.00 am To by <u>the start of the gas day</u>	AGLs feedback is a narrative type style matter rather than a specific matter related to this consultation. However, AEMO agrees this would be a "nice to have". AEMO will add this broader clean up exercise of the RMPs and will add				

			the start of the gas day to 6.00am AEST. However, various clauses have had a specific change made to a time from 6.30am to 6.00 am. AGL recommends that the various clauses be changed to reference the start of the gas day, rather than a specific time that has no other reference within the procedures.	new issue on the Retail Market Issue/Change register.
15	Jemena	3.6.6	Jemena supports the retention of the 12pm delivery time for non STTM network sections. Jemena does not support the change in data delivery time from 9.30am to 9.00am for STTM network (NSW). This will operationally constrain maximizing delivery of actual reads within the timeframe. The potential flow on effect is increased	AEMO does not support Jemena's proposal to leave the data deliver time as 9:30am. With the gas day starting 30mins earlier there is effectively no change to the preparation window of 3 hours to deliver that data.

			volumes of estimate readings and consumptions and subsequent republishing of data to market. This will also have a IT implication to perform corrective system action prior to the data delivery timeframe.	
16	AGL	Ch 12 Transition Clauses	Chapter 12 contains many transition clauses which are no longer relevant and could be deleted from the procedures.	AGLs feedback is unrelated to this consultation. However, AEMO agrees this chapter 12 may no longer be required. AEMO will add these possible redundant provisions as a new issue on the Retail Market Issue/Change register.
17	AGL	A2.3 Calculatio n of EDDs	Have the coefficients for EDD calculation been reviewed for an earlier gas day start. Does the revised gas day start impact this calculation. The procedure recognise a 3.5 hour	AEMO view is a review of the EDD calculation isn't warranted because most estimated reads are replaced by actual reads, and there is a high probability any difference will be negligible. The impact is likely to be similar to the that of using forecast sunshine hours rather than actual (attachment C of the Gas Market Issue for IN004-18 (Amend SA

			lag – now reducing to a 3 hour lag.		RMP to use forecast sunshine hours))
18	AGL	Appendix A	Per previous comment regarding specific times	Suggest note be amended from Note: The <i>gas day</i> is defined as 6:00 am day-1 to 6:000am AEST day+0 so the effective degree day formula implies a 3.0 hour lag in demand to changes in ambient temperature.	AEMO does not support . See AEMO feedback item #17.
				To Note: The gas day is defined as 6:00 am day 1 to 6:300am AEST day+0 so the The effective degree day formula implies a 3.0 hour lag in demand to changes in ambient temperature from the start of the gas day.	

Ref 3	Ref 3 - Participant Build Pack 5 – NSW/ACT Specific Build Pack					
#	Participant	Section #	Issue / Comment	Proposed text Red strikeout means delete and blue underline means insert	AEMO Response	
19	AGL	CI 6.8.2.1	AGL Notes the change in time		AEMO notes AGLs comment.	
20	AGL	CI 7.2.1	Cancellation for RoLR Event AGL questions whether the proposed cancellation time (6.00 am) is appropriate and suggests that the cancellation time frame should be consistent with the Qld Procedures – which	 Suggest a minimum change in each clause: 3 Network Operator for the delivery point no later than 2 hours prior to the start of the gas day by 6.00 am on the RoLR transfer date 	AEMO does not support . See AEMO response for item #13.	

would be 2 hrs prior to the start of the gas day.	
Also, since the action time is the same, the section could be re-written more efficiently, with the time frame in the opening paragraph	

Ref 4	Ref 4 - Retail Market Procedures (South Australia)						
#	Participant	Clause #	Issue / Comment	Proposed text Red strikeout means delete and <u>blue underline</u> means insert	AEMO Response		
21	AGL	CI 177 HDD information	Will AEMO be able to produce the HDD data at the new times (relative to the gas day start time) ?		Yes, AEMO will meet the timing obligation as per clause 177 (4).		
22	AGL	Cl 177 (5) HDD information	Have the co-efficients for the SA HDD been reviewed for an adjusted gas day start time - In particular the change in sunlight hours ?		See AEMO response for item #17.		
23	AGL	CI 229	Noting previous comments about meter data - Is the timing for delivery of UAFG information by the Network achievable – ie 3.5 hrs after the end of the gas day ?		AEMO has provide a response previously in relation to Clause 229. See Impact and Implementation Report (IIR) Attachment E, item 26. There have been no further concerns raised by any Participant subsequent that feedback. The timeframe of 3.5 hour remains.		
24	AGL	CI 310A(4)	AGL notes the timing delivery of 51.5 hrs replicates the 3.5 hr		AEMO assume that AGL's reference to 310A (4) is incorrect.		

			delivery + 2 days. If the 3.5 hr delivery changes, the 51.5 hr may also need to be changed to align delivery times. Is such specific timing required for this process ?		AEMO assumes the reference should be 301A (4). AEMO has reviewed clause 301A and still stands by its original assessment that a change to this provision is not required. Assessing whether the 51.5 hrs is still required is unrelated to this consultation, however AEMO agrees it is worth review and will add this review as a new issue on the Retail Market Issue/Change register.
25	AGL	CI 410	AGL notes that the RoLR actions for SA do not have a clear time for the cancelled or accelerated transfer actions to occur. AGL suggests that for consistency across all procedures, clause 4.10 be amended:	 Suggest the following change: 410. Cancelled and Accelerated Customer Transfers (a) Where a <i>RoLR event</i> has occurred AEMO must, no later than 2 hours prior to the start of the gas day, in relation to a <i>transfer request</i> that is lodged or <i>pending</i>. 	AEMO does not support. See AEMO response for item #13. AEMO does note that unlike the same provisions in Vic, Qld and NSW/ACT RMP, a timeline is not mentioned. In the interest of harmonising the RMPs AEMO will add new issue on the Retail Market Issue/Change register to address this indifference.