

# IMPACT IMPLEMENTATION REPORT (IIR)

## Summary Section

For AEMO to complete and administer.

<b>Issue Number</b>	IN002-16		
<b>Impacted Jurisdiction(s)</b>	Queensland (QLD), South Australia (SA) and New South Wales / Australia Capital Territory (NSW/ACT).		
<b>Proponent</b>	Danny McGowan and Hugh Ridgway	<b>Company</b>	AEMO
<b>Affected Gas Market(s)</b>	<ul style="list-style-type: none"> <li>• Retail</li> <li>• STTM</li> </ul>	<b>Consultation process (Ordinary or Expedited)</b>	Ordinary
<b>Industry Consultative forum(s) used</b>	GRCF and GWCF	<b>Date Industry Consultative forum(s) consultation concluded</b>	Tuesday, 18 December 2018
<b>Short Description of change(s)</b>	Proposed changes to the jurisdictional Retail Market Procedures (RMP) and STTM Procedure in light of the NGR change to harmonise the gas day.		
<b>Procedure(s) or Documentation impacted</b>	Retail Market Procedures for Queensland, South Australia and New South Wales / Australia Capital Territory.		
<b>Summary of the change(s)</b>	In terms of the Wholesale Market, there are no changes to the STTM Procedures. Impacts to AEMO wholesale gas IT systems are minimal. They involve configuration changes only. In terms of the Retail Markets, changes to the RMP will be required. A summary of the recommend RMP changes are described in section 3 of this IIR. There will also be changes to AEMO Retail Market IT systems. These changes are minimal as they only involve configuration changes.		
<b>I&amp;IR Prepared By</b>	Danny McGowan	<b>Approved By</b>	Michelle Norris
<b>Date I&amp;IR published</b>	11 January 2019	<b>Date Consultation under 135EE or 135EF concludes</b>	11 February 2019
<b>Email Address for Responses</b>	<a href="mailto:gdh@aemo.com.au">gdh@aemo.com.au</a>		



## IMPACT & IMPLEMENTATION REPORT – DETAILED REPORT SECTION

### CRITICAL EXAMINATION OF PROPOSAL

#### 1. DESCRIPTION OF CHANGE(S) AND REASONS FOR CHANGE(S)

In early 2017 the AEMC published a rule determination to harmonise the start time of the gas day used in the short-term trading market hubs and the gas supply hub trading locations with the gas day start time used in the Victorian declared wholesale gas market. Under the rule, the gas day in each market at each location will commence at 6.00 am Australian Eastern Standard Time (AEST). This change will also result in standardising the next gas day nomination cut-over time which will be 3pm AEST.

In late 2017 the COAG Energy Council considered a range of reform recommendations put forward by Gas Market Reform Group's (GMRG) which include harmonising the start time of the gas day. Click here to view the GMRG final recommendation paper. At the November 2017 COAG Energy Council meeting, Ministers agreed with the full package of reforms put forward by GMRG which included a recommendation that harmonising the start time of the gas day changes take effect by 1 October 2019. The relevant National Gas Law (NGL) and National Gas Rule (NGR) changes were made by the SA Minister for Energy on 22 November 2018. Click [here](#) to view these amendments.

In September of 2018, AEMO kicked-off a program of work to review the impact of harmonising the start time of the gas day initiative.

In late November, AEMO issued a Proposed Procedure Change (PPC) that detailed the changes to the RMP and invited anyone to make a submission. Section 9 details the outcome of the PPC consultation. In summary most Participants supported these changes.

A summary of the recommend RMP changes are described in section 3 of this IIR. There will also be changes to AEMO Retail Market IT systems. These changes are minimal as they only involve configuration changes.

The broad changes described in section 4 of this IIR will require transition plans to be develop. There will be a separate consultation for the procedure changes that will provide the necessary regulatory relief to facilitate the transition plans. This consultation is targeted to commence in Q1 2019.

Anyone wishing to make a submission for this second stage consultation are to use the response template provided in Attachment D. Submissions close 11 February 2019 and should be emailed to [gdh@aemo.com.au](mailto:gdh@aemo.com.au).

#### 2. REFERENCE DOCUMENTATION

- Retail Market Procedures (Queensland) (ver 16)
- Retail Market Procedures (NSW and ACT) (ver 19)
- Participant Build Pack 5 – NSW/ACT Specific Build Pack (ver 4)
- Retail Market Procedures (South Australia) (ver 13)

#### 3. THE HIGH LEVEL DETAILS OF THE CHANGE(S) TO THE EXISTING PROCEDURES

There are no changes to the STTM Procedures. Impacts to AEMO wholesale gas IT systems are minimal. They involve configuration changes only.

The following is a summary of the Retail Market changes.



- Retail Market Procedures (Queensland)
  - Amend the gas day definition in clause 1.1.1 so that it refers to Part 26 of the NGR.
- Participant Build Pack 4 - Queensland Specific Build Pack
  - No changes were identified.
- Retail Market Procedures (NSW and ACT)
  - Amend the gas day definition in clause 1.2.1 so that it refers to Part 26 of the NGR.
  - Amend the collection time described in clause 3.1.5 (Meter reading frequency) so that the Network Operator is to collect the metering data for each of the daily metered delivery points at 6.00 am;
  - Amend the 9:30am time provision in clause 3.6.6 (c) (Provision of Energy Data to AEMO) to 9:00am.
  - Amend the 6:30am time provisions in clause 7.2 (RoLR event) so that they are changed to 6:00am;
  - Amend clause 8.11.9 (STTM Distribution System Allocation – Daily Calculation) so that it refers to rule 422 of the Rules; and
  - Amend the footnote reference in clause A2.3 (EDD Calculation) so that the lag time hours take into account the 30min time difference.
- Participant Build Pack 5 – NSW/ACT Specific Build Pack (ver 4)
  - Amend section 6.8.2 so that the 11:00am ERFTSTTMPipelineAllocationDataRpt report generated by AEMO will be changed so it will be generated at 10:30am. This report is available only to AEMO.
  - Amend section 6.7.4 and 6.7.5 so that the 9:30 am ERFTParticipantCLP and UAGNotification and ERFTMatchedAllocationsDataNotification reports generated by AEMO will be changed so that they will be generated at 9:00am.
- Retail Market Procedures (South Australia)
  - Amend the gas day definition in clause 1.1.1 so that it refers to Part 26 of the NGR.
  - Delete clause 6A (2) (d)
- SAWA Interface Control Document
  - No changes were identified.
- There will also be changes to AEMO Retail Market IT systems. These changes are minimal as they only involve configuration changes

#### **4. EXPLANATION REGARDING THE ORDER OF MAGNITUDE OF THE CHANGE**

AEMO's assessment in terms of the order of magnitude overall broad changes for gas day harmonisation is that this change will be material. This is because the broader change involves Distributors and Pipeline Operators making modifications to "onsite" meter reading equipment. Remote and manual adjustments will be required depending on the type of metering on sites. Detailed transition plans will also need to be developed by participants.

The materiality of the changes to Retail Market IT system and process for AEMO and presumably, Retailers, Distributors and Pipeline Operators are less complex compared to the broader changes. AEMO is of the view these changes should be uncomplicated configurational IT changes therefore the order of magnitude in this instance is non-material.



## ASSESSMENT OF LIKELY EFFECT OF PROPOSAL

### 5. OVERALL INDUSTRY COST / BENEFIT (TANGIBLE / INTANGIBLE / RISK) ANALYSIS AND/OR COST ESTIMATES

Given that the proposed change is a legislative requirement a cost estimate is not warranted in this instance.

In terms of benefits, having a consistent gas day start time across all jurisdiction that operate under the NGR will enable new participants to partake in these markets more easily. The changes proposed will ensure that the three jurisdictional RMPs are aligned with the new legislative framework and, where possible, with each other. This provides consistency and harmonisation with both the new legislative framework and other jurisdictional gas markets.

### 6. THE LIKELY IMPLEMENTATION EFFECT OF THE CHANGE(S) ON STAKEHOLDERS

As noted under section 4 of this IIR, AEMO, Retailers, Distributors and Pipeline Operators will be impacted by these changes. When implemented, the benefits outlined in section 5 of the IIR should be realised.

### 7. TESTING REQUIREMENTS

AEMO, and presumably Retailers, Distributors and Pipeline Operators with need to modify their IT systems to comply with the harmonised gas day. AEMO's view is these IT system changes do not warrant a co-ordinated industry testing program or a bilateral testing program given the changes are only to configuration.

AEMO and Participants that make Retail Market IT system changes need to assess whether they need to recertify their systems. Click [here](#) for further details about maintaining and achieving technical certification for QLD and NSW, otherwise click [here](#) for further details on SA.

### 8. AEMO'S PRELIMINARY ASSESSMENT OF THE PROPOSAL'S COMPLIANCE WITH SECTION 135EB:

- Consistency with NGL and NGR,
  - AEMO's view is that the proposed change is consistent with the NGL and NGR. The proposed change promotes consistency across four jurisdictions.
- Regard to national gas objective. *"Promote efficient investment in, and efficient operation and use of, natural gas services for the long-term interests of consumers of natural gas with respect to price, quality, safety, reliability and security of supply of natural gas."*
  - It is AEMO's view that this change removes any costs associated with unnecessary differences in processes and procedures, and is in the long-term interests of consumers as it promotes clarity and consistency.
- Regard to any applicable access arrangements
  - AEMO's view is that the proposed change is not in conflict with existing Access Arrangements.



## 9. CONSULTATION FORUM OUTCOMES

On 21 November 2018 AEMO published on its website a PPC that proposed changes to the RMPs in light of the NGR change to harmonise the gas day. Registered participants and interested stakeholders were invited to make submissions which closed on 18 December 2018.

Submissions were received from Origin Energy, AGL, Red/Lumo and Jemena Gas Networks (JGN) and all these responses supported the implementation of this change.

APA (for AGN and Allgas) also submitted a response which flagged a concern pertaining to the change of timeframe for the Network Operator to deliver daily interval meter data to AEMO. APA's feedback proposed adding at least one hour to the overall end-to-end process. AEMO considers that a change of this nature will have further downstream changes that impact the existing timing obligation pertaining to broader STTM arrangements that operate today and formed the cornerstone of the implementation of the STTM market in 2010. AEMO therefore considers that APA's proposal is beyond the scope of this project. AEMO nor any other Participants have raised this concern. A change of this nature would also require a change to clause 422 of the National Gas Rule (NGR).

Red/Lumo, JGN and AEMO also proposed additional changes and a summary on of these changes and AEMO's response to each proposal is contained in Attachment E.

## RECOMMENDATION(S)

### 10. SHOULD THE PROPOSED PROCEDURES BE MADE, (WITH OR WITHOUT AMENDMENTS)?

AEMO recommends that the changes be made as proposed in Attachment A to C.

### 11. IF APPLICABLE, A PROPOSED EFFECTIVE DATE FOR THE PROPOSED CHANGE(S) TO TAKE EFFECT AND JUSTIFICATION FOR THAT TIMELINE.

Subject to all necessary approval's AEMO is targeting to implement this initiative 6:00am AEST on 1 October 2019.

To achieve this timeline, AEMO proposes the following key milestones:

- Issue IIR on 11 January 2019.
- Submission on IIR close 11 February 2019.
- AEMO decision on 1 March 2019.
- Effective date 1 October 2019 (6:00am AEST).



## ATTACHMENT A – DOCUMENTATION CHANGES (SEE SECTION 3)

Blue represents additions Red and strikethrough represents deletions – Marked up changes

- Retail Market Procedures (Queensland)
  - The draft version of the Retail Market Procedures showing tracked changes between the current version and the proposed changes is attached separately to this document.



## ATTACHMENT B – DOCUMENTATION CHANGES (SEE SECTION 3)

Blue represents additions Red and strikethrough represents deletions – Marked up changes

- Retail Market Procedures (NSW and ACT)
  - The draft version of the Retail Market Procedures showing tracked changes between the current version and the proposed changes is attached separately to this document.
  
- Participant Build Pack 5 – NSW/ACT Specific Build Pack
  - The draft version of Participant Build Pack 5 showing tracked changes between the current version and the proposed changes is attached separately to this document



## **ATTACHMENT C – DOCUMENTATION CHANGES (SEE SECTION 3)**

Blue represents additions Red and strikethrough represents deletions – Marked up changes

- Retail Market Procedures (South Australia)
  - The draft version of the Retail Market Procedures showing tracked changes between the current version and the proposed changes is attached separately to this document.





## **ATTACHMENT D – IIR RESPONSE TEMPLATE**

The IIR response template has been attached separately to this document.

There are two sections within the template. Section 1 seeks feedback on the on the IIR itself. Section 2 seeks feedback on each of the changes to each of the procedures.

Anyone wishing to make a submission for this second and final stage consultation are to use this response template. Submissions close 11 February 2019 and should be emailed to [gdh@aemo.com.au](mailto:gdh@aemo.com.au).

## ATTACHMENT E – SUBMISSIONS RECEIVED FOR CHANGE IN002-16

### Consolidated feedback for IN002/16 (Gas Day harmonisation)

Section 1 - General Comments on the Proposed Procedure Change			
Sections 1 to 10 of the PPC sets out details of the proposal. Does your organisation supports 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 rational why you do not support AEMO's assessment.			
Ref#	Participant	Response received	AEMO response
1	Red/Lumo	Red and Lumo Energy (Red and Lumo) support AEMO's assessment of the proposal outlined in the Proposed Procedure Change (PPC) consultation documents. Red and Lumo, however, have provided some additional comments and feedback to the proposed changes and where applicable have provided suggested amendments.	AEMO acknowledges Red/Lumo support of the proposed changes.
2	AGL	AGL supports AEMOs assessment of the procedure changes necessary for the gas day harmonisation.	AEMO acknowledges AGL's support of the proposed changes.
3	Origin Energy	Origin Energy have reviewed the changes proposed as part of this consultation and support the changes	AEMO acknowledges Origin Energy's support of the proposed changes.
4	APA for AGN and Allgas	The impact of these changes on the timeframes for the Network Operator to deliver daily interval meter data to AEMO is of particular concern for APA as it operates distribution networks in each of these jurisdictions (SA, Qld and NSW) and processes and reports this data using a single national systems platform.	AEMO notes APA's concern about the timeframes for the Network Operator to deliver daily interval meter data, but AEMO does not support APA's proposal to alter the deliver interval meter data change from 3.5 to 4.5 hours. A change of this nature will have further downstream impacts that effect the existing timing obligation pertaining to broader STTM



		<p>Whilst the RMP changes are essentially limited to linking the definition of 'gas day' to the definition in Part 26 of the National Gas Rules (6:00am EST), because the interval meter data delivery timeframes in the RMPs are all stated in terms of hours after the end of the gas day (+ 3.5 hours), and these timeframes are not proposed to change, this will have the effect of bringing forward the delivery deadline by 30 minutes in SA and NSW, and by 2 hours in Qld following harmonisation. This will significantly impact upon the processing capacity of our interval meter data capture and reporting systems. Currently we are able to stage the daily processing for each jurisdiction throughout the morning, but following harmonisation the deadlines for reporting to AEMO in each jurisdiction will all be simultaneous. This could lead to an increase in the number of estimates and resends of reports.</p> <p>Therefore APA suggests that the RMP delivery timeframes for Network Operators to deliver interval meter data to AEMO be increased to 4.5 hours. The RMP clauses effected are listed below. This will enable more opportunity to spread the data processing load and minimise the risk of system congestion causing reporting failures and the missing of deadlines.</p> <p>We note also that the STTM Procedures currently already link all of the required AEMO processing timeframes for the wholesale STTMs to time elapsed (+4.5 hours) from the end of the gas day as defined in the NGR. This includes the calculation by AEMO of distribution system allocations</p>	<p>arrangements that operate today and formed the cornerstone of the implementation of the STTM market in 2010. These changes are therefore considered beyond the scope of this project.</p> <p>AEMO nor any other Participants have raised this as a concern. A change of this nature will also require a change to clause 422 of the National Gas Rule (NGR).</p>
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		<p>which depends on the timely delivery by the Network Operator of interval meter data within 3.5 hours. Following harmonisation, this will mean that each of the STTMs run at the same time across all hubs.</p> <p>Therefore we suggest that the AEMO processing timeframes within the STTM Procedures are also increased by 1 hour to 5.5 hours. This will still be consistent with the overall intent of the original reform package, where all daily trading would occur simultaneously.</p>	
5	Jemena Gas Networks	<p>Yes, Jemena recognises that the standard gas day will become 6:00am Australian Eastern Standard Time. Jemena supports AEMO's proposal of no changes to meter data delivery timeframes as this will enable Jemena to meet the new standard gas day requirements with minimal changes to Jemena's processes and IT infrastructure. This will enable Jemena to maintain BAU interval meter and market data delivery for each gas day.</p> <p>Jemena also supports the change in generation time of the RFTSTTMPipelineAllocationDataRpt report from 11:00 to 10:30.</p> <p>Jemena would like to note that there will be a transition plan developed to transfer a number of older meters, which will be requiring a manual update over a period of time. Jemena is to work through the implications of the manual processes required and will include it as part of its implementation plan.</p>	<p>AEMO acknowledges JGN support of the proposed changes. AEMO also notes JGNs comment about including details in JGN's implementation plan about the manual updating of the interval meters.</p>



		Specific comments below.	
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## Section 2 - Feedback on the documentation changes described in Attachment A to C of the PPC

### Ref 1 - Retail Market Procedures (Queensland)

#	Participant	Clause #	Issue / Comment	Proposed text <span style="color: red;">Red <del>strikeout</del></span> means delete and <span style="color: blue;">blue underline</span> means insert	AEMO Response
6	Red/Lumo	1.1	The reference to the National Gas Rules (the Rules) is incorrect. Red and Lumo have provided the correct reference of the Rules to be used in the definition of gas day.	a period of 24 consecutive hours starting at the same time as a <i>standard gas day</i> as defined in Part <del>26</del> <u>20</u> of the <i>Rules</i> .	AEMO does not support the proposed change to reference Part 20 of the Rules. Part 26 is correct.  The AEMC has published amended rules made by the SA Minister on 22 November 2018.  Click <a href="#">here</a> to view these amended rules.
7	AGL	Definitions	AGL notes the change of definition for the start of the Gas Day		AGL comment noted.
8	APA for AGN and Allgas	5.5.1 (1)		<b>5.5.1 Provision of energy data to AEMO</b>  Each Distributor must use its reasonable endeavours to provide to AEMO in relation to	AEMO does not support. See AEMO response for item #4.



				<p>each interval meter required by AEMO for any purpose contemplated by these Procedures:</p> <ul style="list-style-type: none"> <li>(a) the MIRN for the distribution supply point or the custody transfer meter;</li> <li>(b) the consumed energy;</li> <li>(c) the gas day to which the consumed energy pertains;</li> <li>(d) the extract type;</li> <li>(e) a unique identifier for that extract; and</li> <li>(f) information as to whether the readings used to calculate the flow are actual meter readings, estimated meter readings or substituted meter readings,</li> </ul> <p>by no later than:</p> <p>(1) <del>3.5</del> 4.5 hours after the beginning of the first gas day after the gas day to which the consumed energy pertains, as a daily extract; and</p>	
9	APA for AGN and Allgas	6.10.2		<p><b>6.10.2 Determination of STTM distribution system allocations</b></p> <p>(a) By no later than <del>4.5</del> 5.5 hours after the beginning of each gas day, AEMO must determine the STTM distribution system allocations for each User for each STTM withdrawal zone and distribution region for the previous gas day.</p>	AEMO does not support. See AEMO response for item #4.



Ref 2 - Participant Build Pack 4 - Queensland Specific Build Pack					
#	Participant	Clause #	Issue / Comment	Proposed text <del>Red strik</del> means delete and <u>blue underline</u> means insert	AEMO Response
10	AGL	Definitions	AGL notes the change of definition for the start of the Gas Day		See AEMO response for item #7.

Ref 3 - Retail Market Procedures (NSW and ACT)					
#	Participant	Clause #	Issue / Comment	Proposed text <del>Red-strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response
11	Red/Lumo	1.2	The reference to the Rules is incorrect. Red and Lumo have provided the correct reference of the Rules to be used in the definition of gas day.	a period of 24 consecutive hours starting at the same time as a <i>standard gas day</i> as defined in Part <del>26</del> <u>20</u> of the <i>Rules</i> .	AEMO does not support. See AEMO response for item #6.
12	AGL	Definitions	AGL notes the change of definition for the start of the Gas Day		See AEMO response for item #7.
13	AEMO	3.6.6 (c )	Currently there is 3 hours between the start of the gas and when the data mentioned in clause 3.6.6 (9:30am) needs to be received by AEMO. This 3 hour existing timeline needs to continue when the new gas day start time of 6:00am comes into	<b>3.6.6 Provision of Energy Data to AEMO.</b>  ..... <i>A Network Operator</i> must provide the following data to <i>AEMO</i> for each <i>delivery point</i> in its network within the timeframes specified in this clause:  <i>MIRN</i> ; <i>MIRN</i> checksum; aggregated <i>consumed energy</i> data; whether the <i>delivery point meter</i> is a <i>basic meter</i> or an <i>interval meter</i> ;	AEMO supports this change.





			<p>effect so the delivery time needs to be adjusted by 30mins so it becomes 9:00am.</p>	<p>for a <i>non-daily metered delivery point</i>, the <i>meter reading frequency</i>, start date of the period to which the <i>consumed energy</i> data relates; and end date of the period to which the <i>consumed energy</i> data relates.</p> <p>In respect of <i>daily metered delivery points</i>, the <i>Network Operator</i> must:</p> <p>if the <i>delivery point</i> is on an <i>STTM network section</i>, use reasonable endeavours to provide the data specified in paragraph (b) by <del>9:30</del> <u>9:00</u> am on the day of the <i>meter read</i>; or</p> <p>otherwise, provide that data by 12.00 noon on the day of the <i>meter read</i>.</p>	
14	Red/Lumo	8.11.9	<p>Red and Lumo object to the removal the referenced time from this clause. It is unclear why this has been removed.</p> <p>While we agree with AEMO's proposed inclusion of reference to the Rules, AEMO's obligation to calculate a gas day allocation by 11:00 am on the</p>	<p><i>AEMO</i> must calculate the <i>STTM distribution system allocation for the gas day</i>, in accordance with rule 422 of the <i>Rules</i> by <u>11.00 am on the following gas day</u>.</p>	<p>AEMO does not support. Rule 422 covers the STTM distribution system allocations and states that the AEMO must determine the allocation no later than 4.5 hours after the start of each gas day. Linking the procedure clause to the NGR ensures that the documentation is aligned.</p>



			preceding gas day should remain.		
15	Jemena Gas Networks	A2.3	Reference to AEST should not be removed as Part 26 [647 (4)] of NGR retains time reference to AEST	<a href="#">AEST</a>	AEMO supports this change. Clause A2.3 (b) (ii) and (c) (ii) will be amended to include reference to AEST.



Ref 4 - Participant Build Pack 5 – NSW/ACT Specific Build Pack					
#	Participant	Section #	Issue / Comment	Proposed text <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response
16	AGL	Definitions	AGL notes the change of definition for the start of the Gas Day		See AEMO response for item #7.
17	Red/Lumo	5.1	<p>Red and Lumo have a general comment on multiple highlighted sections of the NSW/ACT PBP5 that are not related to gas day harmonisation changes.</p> <p>It seems there is highlighted text throughout the document that opens with quotations, Red and Lumo propose to AEMO that this is removed and simply highlighted without the quotations.</p> <p>There is inconsistency throughout the PBPs where quotations are and are not</p>	<p><del>The distributor will only provide validated meter reads of any meter read type.</del></p> <p>For NSW/ACT the Distributor may deliver meter reads for Non Daily read meters to Self Contracting users using the same format of the equivalent transaction to retailers. In this case the references to 'retailer' should be taken as 'user'.</p>	AEMO agrees that this is unrelated to this consultation. AEMO will add these possible irregularities as a new issue on the Retail Market Issue/Change register.



			<p>used in reference to the highlighted text.</p> <p>(The blue highlighted text are all NSW/ACT differences highlighted throughout the PBP, however, do not require quotations)</p>		
18	Red/Lumo	5.2, 5.6, 5.8, 5.12, 5.14, 5.17.2	<p>Further to comment above, we have identified other clauses throughout the PBP5 where quotations are used.</p> <p>Note: Section 5.7, 5.10, 5.11, 5.13, 5.13.1, 5.14.1 does not use quotation marks at the beginning or end of text. This is inconsistent with all other clauses, we propose AEMO remove them.</p>		See AEMO response for item #17.
19	Red/Lumo	5.17.3 , 5.17.4, 5.17.9 and 5.17.10	<p>Red and Lumo have identified grammatical corrections to the following clauses throughout the PBP5. Example to the right. These changes are unrelated to this PPC, however, we propose AEMO consider removing</p>	<p>“The method of file delivery is FTP via the MIBB.</p>	See AEMO response for item #17.



			<p>them as suggested in comment 5.1.</p> <p>Please let us know should AEMO require a list of other grammatical amendments to be made.</p>		
20	Jemena Gas Networks	6.8.2	<p>No issues changing the generation time of the RFTSTMPipelineAllocation DataRpt report from 11:00 Daily10:30 Daily.</p>		AEMO notes JGN comment noted.
20A	AEMO	6.7.4 and 6.7.5	<p>For the reports ERFTParticipantCLPandUAG Notification and ERFTMatchedAllocationsDataNotification, the trigger time is currently 9:30am. With the shift in the gas day start time, these reports are to be triggered a 9:00am</p>		AEMO supports this change.

Ref 5 - Retail Market Procedures (South Australia)					
#	Participant	Clause #	Issue / Comment	Proposed text <del>Red</del> <del>strikeout</del> means delete and <u>blue underline</u> means insert	AEMO Response
21	Red/Lumo	2	The reference to the Rules is incorrect. Red and Lumo have provided the correct reference of the Rules to be used in the definition of gas day.	a period of 24 consecutive hours starting at the same time as a <i>standard gas day</i> as defined in Part <del>26</del> <u>20</u> of the <i>Rules</i> .	See AEMO response for item #6.
22	AGL	Definitions	AGL notes the change of definition for the start of the Gas Day		See AEMO response for item #7.
23	APA for AGN and Allgas	152 (1) (b) 152 (3) (c)		<b>152. Network operator to provide gate point metering data to AEMO for each gate point</b>  (1) Subject to clause 152(5) the <i>network operator</i> must:  (a) subject to clause 152(4) aggregate the <i>physical gate point metering data</i> provided under clause 151(1), for each of the relevant <i>gas days</i> and for each hour in each of the relevant <i>gas days</i> , in each case across all <i>physical gate points</i> associated with the <i>sub-network</i> (the aggregated hourly and daily data being the " <b>gate point metering data</b> "); and	AEMO does not support. See AEMO response for item #4.



				<p>(b) provide to AEMO as soon as reasonably practicable after receiving the <i>physical gate point metering data</i> from the <i>pipeline operator</i> under clause 151(1), but in any event, no later than <del>3.5</del> 4.5 hours after the end of the <i>gas day</i> the <i>gate point metering data</i>.</p> <p><b>152. Network operator to provide gate point metering data to AEMO for each gate point</b></p> <p>(3) If for any reason (including the operation of clause 151(4)) the network operator does not receive the physical gate point metering data within the time specified in clause 151(1), then the network operator must:</p> <p>(a) as a reasonable and prudent person, estimate the gate point metering data, for the gas day and each hour in the gas day, for each gate point;</p> <p>(b) mark the estimated gate point metering data as an estimate; and</p> <p>(c) provide the estimate to AEMO within <del>3.5</del> 4.5 hours after the end of the gas day.</p>	
24	APA for AGN and Allgas	158 (1) (b)		<p><b>158. Time for provision of metering data to current users and AEMO – basic and interval meters</b></p> <p>(1) Subject to clauses 158(2) and 159, a network operator must provide:</p> <p>(a) to the user and AEMO (as the case may be) the metering data for a basic-metered delivery point □ by 5.00pm on the business day after the</p>	AEMO does not support. See AEMO response for item #4.

				<p>network operator receives the meter reading data (under clause 143 or as a result of a special meter reading under clause 147); and</p> <p>(b) to the user and AEMO (as the case may be) the metering data for an interval-metered delivery point □ within <del>3.5</del> 4.5 hours after the end of the gas day to which the meter reading relates.</p>	
25	APA for AGN and Allgas	189 (2)		<p><b>189. Revised allocation instructions</b></p> <p>(1) A user may from time to time give AEMO a revised allocation instruction for a gas day.</p> <p>(2) Subject to clause 189(3), a revised allocation instruction given under clause 189(1) may be given at any time up to <del>3.5</del> 4.5 hours after the end of a gas day to which it applies.</p>	AEMO does not support. See AEMO response for item #4.
26	APA for AGN and Allgas	229 (1)		<p><b>229. Estimate of unaccounted for gas</b></p> <p>(1) For each sub-network for each gas day, within <del>3.5</del> 4.5 hours after the end of the gas day, the network operator must advise AEMO of its estimate of UAFG (which may later be revised under clause 223(2)) ("EUAFG"), the name of each user who is a supplier of UAFG for the sub-network and the quantity of the UAFG estimated to be supplied by each supplier.</p>	AEMO does not support. See AEMO response for item #4.
27	APA for AGN and Allgas	151 (1)		<p><b>151. Pipeline operators to provide physical gate point metering data</b></p> <p>(1) Subject to clause 151(4), for each physical gate point for each gas day, the pipeline operator must provide to the network operator as soon as reasonably practicable after the end of the gas</p>	AEMO does not support. See AEMO response for item #4.





				day, but in any event, no later than <del>2.5</del> 3.5 hours after the end of the gas day, for the gas day and each hour in the gas day, at least two of the following:	
28	APA for AGN and Allgas	223 (2) (c)		<p><b>223. Net system load</b></p> <p>(2) If AEMO’s calculation of net system load for any historical gas day i for gas day D under clause 223(1) produces a negative number or AEMO does not receive an estimate of unaccounted for gas for the sub-network for gas day D under clause 229(1), AEMO must:</p> <p>(c) for each user notified to AEMO as a supplier of UAFG for the subnetwork under clause 229(1) for the most recent gas day for which no revised estimate of unaccounted for gas was required to be calculated under this clause 223(2) (“last valid day”), calculate, and within <del>4.5</del> 5.5 hours after the end of the gas day advise the user and the network operator of, the “revised user’s unaccounted for gas” as follows:</p>	AEMO does not support. See AEMO response for item #4.