

Attachment A: Stakeholder feedback template

This template has been developed for stakeholders to provide their feedback on the proposed amendments outlined in the consultation paper, in addition to other concerns or issues that stakeholders have. The AER encourages the use of this template for submissions however stakeholders should not feel obliged to provide feedback on each question. The rationale for the proposed amendments can be found on **Error! Reference source not found.** and **Error! Reference source not found.** of the consultation paper.

Stakeholder details

Organisation: **ENGIE Australia & New Zealand**

Contact name: **Matthew Giampiccolo**

Email:

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Date of submission: **12 May 2023**

Question	Stakeholder submission
General amendments that will impact routine requirements	
<p>1. Do you think the requirement for facility operators and shippers to record time in a 24-hour format is appropriate? If not please state reasons?</p>	<p>Yes – this requirement is appropriate.</p>
Amendments that will impact routine requirements – Transportation Facility Users (shippers)	
<p>2. Do you think the proposed clarification of the time when the event(s) or other occurrence(s) took place that led to the renomination (HHMM1) and the time when the shipper became aware of the event(s) or other occurrence(s) (HHMM2) is clear and appropriate? If not, what changes to the proposed wording would you recommend?</p>	<p>The current Guideline describes that both HHMM1 and HHMM2 may reflect the time a decision was made to renominate. We would appreciate some further information from the AER on the proposed clarifications that would be made to the Guideline and whether this would change any of the existing description.</p> <p>While we consider the Guideline is already sufficiently clear that HHMM1 and HHMM2 can be set as different times (as per the description on p.16 of the Guideline), a potential change may be to add an additional sentence to the current description that clarifies that HHMM2 can be different to HHMM1 if the shipper first became aware of the event(s) or other occurrence(s) at a later time than when the event(s) or other occurrence(s) took place.</p>
<p>3. Do you think the proposed addition of a <u>record creator reporting field</u> will improve accountability when it comes to ensuring that records are accurate and verifiable? If not please indicate why not?</p>	<p>We do not support the addition of this field. As the compliance obligations ultimately sit with the business and not the individual record creator, we do not consider there is sufficient justification to require this field. Our traders already have sufficient incentive to ensure that the records created are accurate and verifiable.</p> <p>The AER should also consider whether there may also be some privacy-related</p>

	implications of requiring shippers to disclose personal information of their staff through these records.
4. Do you think the addition of a record timestamp reporting field will improve shipper compliance to create <u>contemporaneous</u> records? If not please indicate why not?	<p>While the timestamp reporting field does not appear to be a requirement under the National Gas Rules, we understand that this field may assist the AER with assessing the compliance of records.</p> <p>ENGIE’s key concern with this proposal relates to how the AER assesses whether a record is ‘contemporaneous’ and whether the proposed timestamp reporting field will accurately reflect when a record was initiated. [confidential information has been removed]</p>
5. Do you think the addition of two additional category field options (MA and EO) for the <u>category reporting field</u> is appropriate and will allow shippers to accurately record the reason for renomination? If not please indicate why not?	We are comfortable with the addition of these two category field options.
6. Do you think the additional requirement for shippers to record the delivery and receipt point of the transportation service that relates to the renomination is appropriate? If not please indicate why not?	While we do not have specific concerns with this proposal, we would be interested in more detail and some examples of how specific the AER expects the delivery and receipt points to be described in records.
7. Do you think the proposed requirement to include the following information in the <u>description reporting field</u> offers specific clarity	ENGIE is comfortable with item a) and c). In relation to item b), we consider that the category reporting fields are sufficiently descriptive to be relied on to describe the reason for renomination in most instances. Our preference would be that item b) be

<p>for the AER to verify the specific reason for material renomination and ensure that there is sufficient detail?</p> <ol style="list-style-type: none"> a. Background/context explaining the events that led to the renomination; b. Reason for renomination and why the specific category field option was chosen; and c. If applicable, any other further guidance on the reason for renomination. 	<p>an optional field that can be filled out if the shipper considers that additional information is required to explain and provide context for the renomination.</p> <p>We note that the AER would continue to have the right to request further information on the reason for the chosen category field, if necessary.</p>
<p>General questions</p>	
<p>8. Do you think there are any impediments for facility operators and/or shippers to comply with the additional requirements set out in the consultation paper?</p>	<p>ENGIE can comply with the additional requirements set out in the consultation paper. [confidential information has been removed]</p>
<p>9. Do you think the proposed amendments to the Guideline are proportionate and appropriate to aid facility operator and shipper compliance with the NGR and the NGL?</p>	<p>This detail is provided in the answers above – there are some proposed requirements that we do not agree are proportionate, such as the proposed record creator reporting field.</p>

<p>If not, why not?</p>	
<p>10. What are the additional costs that may be incurred by facility operators and shippers in complying with the proposed amendments?</p> <p>If you have identified additional costs, do you think that these costs are proportionate and appropriate?</p>	<p>ENGIE has not specifically identified additional costs in complying with the proposed amendments.</p>
<p>11. Do you think the proposed amendments effectively addresses the issues raised in the rationale column in Tables A and B?</p> <p>Are there more appropriate ways to address the issues raised in the rationale?</p>	<p>We have no further comments on the proposed amendments.</p>
<p>12. Do you have any additional concerns and/or comments that you would like to make?</p>	<p>We have no further comments on the proposed amendments.</p>