

Draft

Day Ahead Auction

Record Keeping Guideline

Version 2

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Glossary

Shortened form	Extended form
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
CTP	Capacity Trading Platform
CBU	Contracted but Un-nominated
DAA	Day Ahead Auction /Capacity Day-Ahead Auction
Facility operator	Auction Facility Operator
Guideline	Nominations and Scheduling Records Guidelines and Renomination Records Guideline (together, the Record Keeping Guideline)
Information Standard	Part 24 Information Standard
NGL	National Gas Law
NGO	National Gas Objective
NGR	National Gas Clauses
Renomination records	Contemporaneous Renomination Records
RKG	Record Keeping Guideline
Shipper	Transportation Facility User
TFSR	Transitional Firm Service Rights

1. Introduction

Part 25 of the National Gas Rules (NGR) require the Australian Energy Regulator (AER) to develop and publish Nomination and Scheduling Records Guidelines and *Renomination Records* Guidelines¹ (together, “Record Keeping Guideline” or “Guideline”) for the purposes of the Capacity Day Ahead Auction. ~~This document is our~~ **Guideline**.

1.1 Purpose of this Guideline

The purpose of this Guideline is to ~~set out the manner and form in which~~ create binding, enforceable obligations on auction facility operators (facility operators) and transportation facility users ~~must~~ (shippers) to make, ~~and~~ maintain ~~and keep data and information~~. ~~This Guideline also sets out when the AER will request this data to assess compliance with the NGR and National Gas Law (NGL) and discuss how we will treat confidential information.~~ nomination, renomination, scheduling and rescheduling records. Facility operators and shippers must comply with this Guideline for each operated or used auction facility.

~~We note that, in addition to setting~~ This Guideline sets out:

- the manner and form in which ~~affected parties must keep~~ nomination, renomination, scheduling and rescheduling records under Part 25 are to be made and maintained;
- an outline of the NGR, ~~this Guideline also includes discussion of the~~ relevant obligations in the NGR and the National Gas Law (NGL) as to when records must be kept, and what must be recorded. ~~However, this; and~~
- when the AER will request nomination, renomination, scheduling and rescheduling records to assess compliance with the NGR, the NGL and this Guideline.

This Guideline is not a substitute for ~~the NGR,~~ and should be read in conjunction with, the NGR and the NGL. In the event of any inconsistency ~~between this Guideline and,~~ the NGR, ~~and~~ the NGR/NGL will prevail.

Under Clause 665(1) ~~requires that of the NGR,~~ a facility operator must make, ~~and~~ maintain ~~and keep records of~~ nomination, renomination, and scheduling and

¹ NGR, cl. 665(1)(b), 665(3), 666(1) and cl 666 (5).

~~rescheduling~~ information ~~in nomination and scheduling records~~. The AER is required under the NGR to publish guidelines as to the matters to be included in records, ~~including certain mandatory fields, and also and~~ the manner in which the records are to be made and kept.² This document constitutes those guidelines.

Clauses 666(1), (2) and (3) of the NGR require that a transportation facility user must make, maintain, and keep ~~a~~ contemporaneous ~~record~~ records —of material *renominations* (*renomination records*) of firm ~~or auctions~~ and auction services.³ The AER is required under the NGR to set out ~~throughin~~ this Guideline the manner and form in which the *renomination records* are to be kept (including ~~through~~ contemporaneous records)⁴. Under clause 666(5)(b), of the NGR, the AER is also required to develop guidelines for handling confidentiality claims.

~~The AER is empowered under clauses~~ Clauses 665(6) and 666(4) of the NGR allow the AER to require the provision of *obtain nomination and scheduling records which are kept by* ~~from~~ *facility operators* and renomination records of firm and auction services from transportation facility users ~~in accordance with and the NGR and this Guideline at any time, upon written request.~~

1.2 Roles and functions of the AER

The AER's general functions and powers, in respect of monitoring and enforcement of compliance with the NGR and the NGL, are outlined in section 27 of the NGL.

Our functions ~~for~~ regarding the Capacity Auction, ~~{often referred to -by industry as the Day Ahead Auction~~ (DAA) include:

- monitoring that facility operators for an auction facility ensure that terms and conditions for use of an action service provided by means of an auction facility, and the scheduling process for the auction facility, give effect to the auction service priority principles in rule 651.⁵
- auction monitoring day-ahead nominations, renominations and activity in the capacity auction to ensure that transportation service providers, auction participants

² NGR, cl. 665 (2) and (3).

³ In relation to firm services, the requirements relate to all transportation services ~~taken into account~~ considered in the calculation of the auction quantity limit ~~which can for example also include transitional firm services if registered.~~

⁴ NGR, cl. 666(4) and cl 666(5).

⁵ NGR, cl.650(2)

and transportation facility users comply with the DAA market conduct and nomination rules;⁶

- ~~certifying the existence of Transitional Firm Service Rights (TFSR) for an auction day for the first 2 years of the market;~~⁷
- monitoring ~~day-ahead nominations, renominations and~~ auction participant activities in connection with the capacity auction to:
 - (a) comply with all applicable laws relevant to the performance of its obligations;
 - (b) not act fraudulently, dishonestly or in bad faith; and
 - (c) not engage in any conduct with the intent of distorting or manipulating prices (including reported prices) or the outcomes of the capacity auction misleading any person.⁸
- monitoring shipper conduct to ensure compliance;⁹ ~~and~~ with the requirement to not engage in any conduct with the intent of distorting or manipulating prices in the capacity auction.¹⁰
- monitoring shipper nominations and renominations to ensure that they are not false, misleading or likely to mislead.¹¹
- monitoring compliance with other parts of Part 25 of the NGR including submission of data and information in accordance with the *Part 24 information standard* (discussed below) and adherence to the *auction service priority principles*.¹²

We are committed to ensuring industry compliance with the NGR, NGL and this Guideline to build confidence in the DAA. The AER will work cooperatively with *shippers* and service providers to help them understand their record keeping obligations and to ensure general Part 25 compliance ~~generally~~.

⁶ NGR, cl. 664(1).

⁷ ~~NGR Schedule 5, Pt 4, cl 5.~~

⁸ ~~NGR, cl. 661(1).~~

⁹ ~~NGR, cl. 664(1).~~

¹⁰ ~~NGR, cl. 661(2).~~

¹¹ ~~NGR, cl. 663(1).~~

¹² The auction service priority principles are set out in the NGR in clause 651.

The AER will monitor, investigate and enforce compliance with the [NGR](#), NGL and [NGRthis Guideline](#) in relation to the DAA from the *capacity auction start date* in each participating jurisdiction.

Our *Compliance and Enforcement* ~~—Statement of Approach~~[Policy](#) is available on our website¹³. It details our approach to compliance, the enforcement options available to us and sets out the criteria we apply when exercising our discretion regarding enforcement action. Matters are assessed on a case-by-case basis, with all relevant circumstances being considered, including those outlined in our [Statement of Approach](#)[Compliance and Enforcement Policy](#).

¹³ <https://www.aer.gov.au/publications/corporate-documents/aer-compliance-and-enforcement-statement-of-approach>
<https://www.aer.gov.au/publications/reports/compliance/aer-compliance-enforcement-policy>

1.3 AER enforcement of the National Gas Rules and National Gas Law

The NGL gives the AER power to monitor, investigate, and enforce compliance with the NGR, NGL and associated Regulations and Guidelines (including this Guideline).¹⁴

The enforcement and compliance responses available to the AER in respect of breaches of the NGL or NGR can generally be categorised as either:

- administrative resolution, such as voluntary undertakings, revisions to internal processes or improved compliance training; or
- statutory enforcement action, such as infringement notices, court enforceable undertakings or instituting proceedings.

Clauses Rules 665(1), 665(6) and 666(1), (2), (4) of the NGR are currently classified as Tier 2 civil penalty provisions and Schedule 3 of the National Gas (South Australia) Regulations.

Clause 649(1), under Part 25 of the NGR requires that a *facility operator* and *transportation facility user* comply with the Part 24 information standard when making, preparing and submitting records and any information or data provided to the AER. ~~We expect that records, information and data provided to the AER is at a standard that reflects 'Good Gas Industry Practice'.~~ This clause is classified as a Tier 2 penalty provision and Schedule 3 of the National Gas (South Australia) Regulations. This clause is also classified as a conduct provision under the NGR and Schedule 4 of the National Gas (South Australia) Regulations.

Where *facility operators* and *transportation facility users* have identified potential breaches of this Guideline or potential breaches of the relevant national gas rules, they should submit voluntary self-reports to the AER¹⁵. Where a compliance issue or suspected compliance issue is likely to have significant consequences, or has the potential to cause serious harm, the issue should be immediately self-reported to the AER. All other instances of non-compliance identified should also be self-reported to the AER as soon as possible after the conduct has been identified and assessed.

¹⁴ National Gas Law, section 27

¹⁵ <https://www.aer.gov.au/wholesale-markets/compliance-reporting/guidance-note-submitting-wholesale-energy-self-reports-to-the-aer>

1.4 Process for Guideline revision

Clause 665(3) of the NGR allows the AER to amend ~~the~~this Guideline from time to time in accordance with the requirements of the NGR. We will review and amend ~~the~~this Guideline as we consider appropriate. A version number and effective date of issue will identify every version of ~~the~~this Guideline.

The AER ~~is~~was not required to comply with the standard consultative procedure in developing the initial Guideline.¹⁶ However, ~~subsequent revisions/amendments~~ to ~~the~~this Guideline ~~will behave been~~ made in accordance with the *standard consultative procedure*.¹⁷

In developing and amending this Guideline under Clause 665(3) of the NGR, the AER must have regard to the need for costs likely to be incurred by *facility operators* in complying with this Guideline to be proportionate and appropriate. Similarly, under Clause 666(6)(b) of the NGR, the AER must have a regard of cost-effectiveness in compliance for transportation facility users, ensuring it aligns with the need for accurate, timely information critical for efficient capacity auction operations and transportation *scheduling*.

1.5 Definitions and interpretation

In this Guideline, the words and phrases presented in italics have the meaning given to them in either the glossary, or if not defined in the glossary, the NGR or NGL.

1.6 Monitoring Framework and this Guideline

As indicated in Schedule 3 of this Guideline, the AER's information requests to monitor the DAA market conduct and nomination rules¹⁸ will not solely rely on clauses 665(6) and 666(4) ~~and of~~ the NGR and this Guideline. In particular, we may seek information under our general power in section 42 of the NGL¹⁹. This includes information on *renominations* which are not material *renominations* as defined in clause 666(2) of the NGR where ~~nevertheless~~ we are concerned as to compliance with the DAA market conduct and nomination rules under our general power in section 42 of the NGL. We may use ~~this~~our power under section 42 of the NGL to obtain documents relating to the performance of our functions.

¹⁶ NGR, schedule 5, cl. 4(4).

¹⁷ NGR, cl. 665(4).

¹⁸ NGR, cl. 664(1).

¹⁹ <https://www.aer.gov.au/publications/guidelines-schemes-models/compulsory-notice-guidelines>

2 Facility Operators

2.1 ~~Reporting Record Keeping~~ requirements

Clause 665(1) ~~of the NGR~~ requires a *facility operator* to make and maintain *nomination, renomination* and *scheduling* records for each of their auction facilities and to record:

- Day-ahead nominations for the use of the *auction facility* (including deemed or default nominations) made prior to the *nomination cut-off time*, ~~which will~~. This must include information on the quantity nominated and the time the day-ahead nomination was made; The auction service nomination cut-off time is set at 6:45pm on the day before the gas day to which the nomination relates²⁰;
- *Renominations* ~~that occur following~~ made after the nomination cut-off time, ~~which will~~. This must include information on the quantity renominated and the time the renomination was made. The standard nomination cut-off time is 3:00pm on the day before the gas day to which the nomination relates²¹; and
- The scheduled quantity for each service provided by means of the facility.

The *nomination and scheduling records* must set out the:

- gas day;
- *transportation facility user*;
- *auction facility*; and
- *transportation service*.²²

Clause 665(6) ~~allows of the NGR~~ requires facility operators to give the AER ~~to obtain nomination and scheduling records from facility operators~~ at any time, upon written request by the AER.

~~2.2 Transitional obligations during the first two years~~

~~The following record keeping obligations relating to TFSR will be applicable during the transitional period. A facility operator, in its nomination and scheduling records, is to provide for the separate identification of:~~

²⁰ NGR, cl. 678(3).

²¹ NGR, cl. 678(2).

²² NGR, cl. 665(2).

- a. ~~each transitional firm quantity and the market generating unit to which the transitional firm quantity was supplied; and~~
- b. ~~any renomination of the transitional firm service that occurred after the nomination cut-off time that reduced the transitional firm quantity, or resulted in any part of the transitional firm quantity used in the calculation of an auction quantity limit being supplied other than:~~
 - ~~for consumption by a market generating unit, or~~
 - ~~another transportation facility for onward transport to a market generating unit.~~²³

~~The form of reporting these transitional obligations is set out in Table 2, in the following section.~~

2.2 -Form of nomination and scheduling records

Nomination and scheduling records must be kept ~~such in a format~~ that ~~they~~ can be submitted to the AER in an ~~excel~~Excel spreadsheet. *Nomination and scheduling records* must include the reporting fields specified in Table 1. ~~During the transitional period, nomination and scheduling records must also include the information set out in Table 2.~~

An example of how this information can be captured in *nomination and scheduling records* is outlined in ~~Schedule 1 of this Guideline~~. *Facility operators* may keep *nomination and scheduling records* differently to what is set out in Schedule 1, provided that the record still contains the reporting fields in Table 1 and the record captures all the information in the description field in Table 1.

For example, in cases where there are multiple receipt points and delivery points for the same transportation service, it is permissible to record nominations and *renominations* for the receipt and delivery points ~~for a transportation service~~ in a number of separate rows, rather than in a single row, ~~where there are multiple receipt points and delivery points for,~~ When describing the same type of transportation service. ~~It, it~~ is also permissible to describe the ~~transportation~~ service over two columns if systems are better suited to identifying a service as forward haul, backhaul or compression (type of service), separately in addition to identifying the service as a firm, as available, or auction service (priority of service).

²³ ~~NGR Schedule 5, Pt 4, cl 11(3).~~

Table 1

Reporting Field	Description
Record accuracy sign-off	<p>The name of the individual who made the record or who is responsible for the accuracy of the record.</p> <p>The signature of the individual who made the record or who is responsible for the accuracy of the record.</p>
Gas day	The gas date for which the <i>nomination</i> or <i>renomination</i> is made. Expressed as: day-month-year (DD/MM/YYYY).
Time (24 hr format)	<p>The time, in 24 hour format: HH:MM.</p> <p>The time should be in Australian Eastern Standard Time.</p>
Transportation facility user	The name of the <i>shipper</i> .
Auction facility	The name of the pipeline or compression station.
Transportation service	<p>A description of the type of transportation product<u>service</u>. This should include:</p> <ul style="list-style-type: none"> • firm forward haul; • as available; • backhaul; and • auction
Scheduled quantity	Must be expressed in GJ.
Day-ahead nomination(s) and Renomination(s)	<p>Must be expressed in GJ.</p> <p>Do not need to include nominations of 0 GJ that have not been renominated.</p> <p>Do not include all requested nominations by <i>shippers</i>, only nominations that are approved and scheduled.</p>
Receipt	Name of the receipt point location.
Delivery	Name of the delivery point location.

Renomination Count	The number of times a <i>renomination</i> occurs once final nominations and auction quantities have been decided. -For example, if a <i>shipper's</i> final firm <i>nomination</i> used in the auction is 10-000 GJ but it subsequently renominates 20-000 GJ and then renominates again to 15- 000 <u>000</u> GJ, the <i>renomination</i> count is 2.
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2.3 Time required to keep records

Clause 665(5) [of the NGR](#) requires a *facility operator* to maintain *nomination and scheduling records* for a period of five years after the gas day to which the records relate.

2.54 Date information and data must be submitted

The AER requires that a *facility operator* [give provide](#) *nomination and scheduling records* to the AER by:

- a. the tenth day of each month for data from the previous month; and
- b. more urgently on written request by the AER for specified days.²⁴

We consider that the requirement for records to be submitted by the tenth day of the following month – rather than the last day of the month or the first day of the following month – will provide *facility operators* the opportunity to better ensure the accuracy of *nomination and scheduling records*.

In addition to the periodic monthly requirement, we may require *nomination and scheduling records* from *facility operators*, via ad hoc request, for a particular day or period within the month, in certain circumstances. For example, we may require records in relation to a specific event such as a high auction price or large curtailment of auction gas.

[The AER has established a data portal to receipt pipeline nominations from facility operators. The AER has published a user guide²⁵ which outlines the steps that facility operators must take when submitting information via the data portal. As of 2022, all facility operators are using this portal to submit pipeline nominations data.](#)

²⁴ NGR, cl. 665(6).

²⁵ <https://www.aer.gov.au/system/files/Pipeline%20Nominations-Portal-Guide.pdf>

3 Transportation Facility Users

3.1 Reporting Requirements - Material Renominations

Clause 666(1)—of the NGR requires a *transportation facility user* to make a contemporaneous *renomination* record (~~renomination record~~) that provides a verifiable and specific reason for any material *renomination*. A contemporaneous *renomination* record is to be made at the same time or very shortly after, the material *renomination*. A contemporaneous *renomination* record must be made for each material *renomination*. The AER may obtain these contemporaneous records as part of information to substantiate and verify the reasons for a material *renomination*, upon written request to the *shipper*.²⁶

The contemporaneous record must specify:

- a. The material conditions and circumstances giving rise to the *renomination*;
- b. The *shipper's* reasons for making the *renomination*, which must be verifiable and specific;
- c. The time at which the event or other occurrence giving rise to the *renomination* occurred; and
- d. The time at which the *shipper* first became aware of the event or other occurrence.²⁷

Material *renomination*

A ~~renomination~~ A *shipper's* *renomination* is a material *renomination* in relation to a gas day and transportation service if:

(a) the *renomination* is for:

- (i) a transportation service taken into account in the calculation of an auction quantity limit; or
- (ii) an auction service; and

(a)(b) will be considered 'material' if the *renomination* (either alone or when taken together with other *renominations* by the *shipper* for that service) – whether before or after *renomination* – results in a variation of ~~10 per cent or more~~ than 10% of the following:

²⁶ NGR, cl. 666(4).

²⁷ NGR, cl. 666(1).

- the last day ahead *nomination* received prior to nomination cut-off for services other than the auction service; or
- the initial *nomination* for use of the auction service.²⁸

Two examples are provided below of *renominations* which result in a material *renomination* either on a stand-alone basis or when taken together with previous *renominations*. These could be *renominations* either to a receipt point quantity or delivery point quantity (or both), with the record keeping requirement applying to a variation to a receipt point or delivery point.

Example 1 – Stand Alone

The day before the gas day, a *shipper* wins 100 TJ from the auction and nominates 95 TJ of capacity at nomination cut-off. On the gas day the *shipper* renominates downwards to 80 TJ. This is a material *renomination* as there is a variation of more than 10 per cent between the *renomination* of 80 TJ and the initial *nomination* of 95 TJ.

Example 2 – Taken Together

The day before the gas day, a *shipper* nominates 100 TJ of firm capacity at nomination cut-off. On the gas day, the *shipper* renominates upwards to 105 TJ and then renominates upwards again to 111 TJ. This is a material *renomination* as there is a variation of more than 10 per cent from these renominations, when taken together, from the final *nomination* before cut-off.

We are aware of the difficulties for some *shippers'* systems to identify ~~material~~whether *renominations* ~~for~~were against firm ~~and~~or auction services ~~and only record reasons for these renominations.~~ We consider in these situations that recording reasons for every renomination would be consistent with the record keeping requirement. Further, if shippers renominate without identifying whether the transportation service renominated against is firm or auction (and they nominated for both), then in order to ensure compliance with clause 666 of the NGR, reasons will need to be kept based on a more than 10% variation to the lower quantity service.

²⁸ NGR, cl. 666(2).

3.2 Provision-Content of contemporaneous records to AER be kept

Where the AER makes a written request to substantiate and verify a material *renomination*, we expect a contemporaneous record for each material renomination to be provided which includes the reporting fields and the description noted in Table 32. An example of how this record may be reported is provided in **Schedule 2** of this Guideline.

Shippers are able to make contemporaneous records in a manner consistent with their current systems, provided the records submitted to the AER include the reporting fields specified below. –The AER considers an Excel spreadsheet with this information is sufficient.

Table 32

Reporting Fields	Description
<u>Record creator ID</u>	<u>A unique identifier for the individual who made the record.</u>
<u>Record timestamp (24 hour format)</u>	<p><u>The time and date for which this record is created.</u></p> <p><u>The time, in 24 hour format: HH:MM. The time should be in Australian Eastern Standard Time.</u></p> <p><u>The date expressed as: day-month-year (DD/MM/YYYY).</u></p> <p><u>This reporting field should be expressed as: HH:MM, DD/MM/YYYY.</u></p>
Category	May be either P for a plant or physical change, M for market change <u>or, MA in response to an AEMO market notice or direction</u> , E for a <i>renomination</i> to address an error <u>made by the transportation facility user, EO to address an error made by a party other than the transportation facility user, ER for a pipeline request/direction.</u>
Gas day	The gas date for which the <i>renomination</i> is made. Expressed as: day-month-year (DD/MM/YYYY).
Auction facility	The name of the pipeline or compression station.

<p>Transportation service</p>	<p>A description of the type of transportation productservice. This should include, where known²⁹:</p> <ul style="list-style-type: none"> • firm • transitional firm; and • auction
<p>HHMM1 (24 hr format)</p>	<p>The time, in 24 hour format, when the event(s) or other occurrence(s) took place that gave rise to the renomination.</p> <p>May be expressed as a range. For example, ~12:30-13:00.</p> <p>May also reflect the same time as a decision was made to renominate</p> <p>The time should be in Australian Eastern Standard Time.</p>
<p>HHMM2 (24 hr format)</p>	<p>The time, in 24 hour format, when the <i>shipper</i> first became aware of the event(s) or other occurrence(s).</p> <p>This may be the time a decision was made to renominate.</p> <p>The time should be in Australian Eastern Standard Time.</p>
<p><u>DDD...DD</u> Description/reason for renomination</p>	<p>1. Is a verifiable description of the events or occurrences that explain the renomination. <u>This must include:</u></p> <ol style="list-style-type: none"> <u>1. Background/context explaining the events that led to the renomination;</u> <u>2. Reason for renomination and why the specific category field option was chosen; and</u> <u>3. If applicable, any other further guidance on the reason for renomination (optional).</u> <p>There is no character limit for this field.</p>

²⁹ If a transportation service cannot be determined, please specify it is undetermined. We note the obligation for a *shipper* to record material renominations still remains (see under examples, 3.1)

Category field

The category field must include the nature of the change that has led to a renomination.

The category field options are:

1. P for a plant or physical change;
2. M for market change;
3. MA for a market change identified or caused by AEMO;
4. E for a renomination to address an error;-
5. EO for a renomination to address an error made by a third party;-
6. ER for pipeline request/direction.

The category P for plant or physical change should be used to categorise changes that specifically relate to facility:

- constraints;
- testing;
- ramping capacity;
- maintenance; and
- outages.

The market change category ~~should include~~ M includes any change that is financial or commercial in addition to change that may be seen as 'external' from a facility's operational control, including:

- responding to a curtailment event;
- change in supply;
- change in market schedule;
- avoiding overrun charges;
- change in forecast weather or demand;.

The market change category MA includes any change due to an action taken by AEMO, including:

- AEMO direction; and
- AEMO event;-; and
- AEMO market notice

The category E for error should be used to categorise an error made by the facility transport user in one or more of the following categories:

- a clerical mistake or an accidental slip or omission;
- a miscalculation or misdescription; and
- any other error.

The category EO is specifically for errors made by third parties that result in a renomination for example where a customer provides incorrect information to a facility transport user.

The category ER for when a pipeline requests a *shipper* to renominate against firm and/or auction services to assist in their gas balancing activities.

Examples of error classification includes a *nomination* of gas that exceeds allowable/contracted capacity, a discrepancy between entry and exit *nominations* or updating a *nomination* due to a failure to submit or update before the *nomination cut-off time*.

We recognise that some *renomination* reasons may span over multiple categories. For example, a *renomination* due to a portfolio imbalance may, in turn, be due to a change in physical or plant conditions as well as a market change. For consistency purposes, *renominations* due to a portfolio rebalance should be classified as category M for market change.

~~*renominations* due to a portfolio rebalance should be classified as category M for market change.~~

~~We consider the market change category should include any change that is financial or commercial in addition to change that may be seen as 'external' from a facility's operational control, including:~~

- ~~• responding to a curtailment event;~~
- ~~• change in supply;~~
- ~~• change in market schedule;~~
- ~~• avoiding overrun charges;~~

~~change in forecast weather or demand;~~

- ~~• AEMO direction; and~~
~~AEMO event.~~

The reasons listed under these ~~categories~~ categories are not exhaustive ~~and may not provide a clear distinction for all other reasons.~~ If there is doubt as to how a *renomination* should be categorised, we expect that *shippers* adopt a consistent practice for how they categorise the *renomination* in their contemporaneous records, ~~and also that there is sufficient and consistent detail in the description field.~~

Time of event field (s)

Clauses 666(1)(c) and (d) of the NGR require the time at which the event occurred leading to the material *renomination* to be specified separately from the time at which the *transportation facility user* became aware of that event.

~~We understand from shippers that recording a contemporaneous record of both times has the potential to add to complexity of trader contemporaneous record keeping.~~

~~Also, we understand the~~ The decision to renominate may be a decision which occurs over time in response to a number of changes and therefore ~~expect~~ the reporting of a time range may be common in this situation. However, where there is a delay between the event which has led to a renomination being required (HHMM1) and the time the shipper became aware of that event (HHMM2), it is important that this information is accurately recorded.

In order to capture various circumstances in which renomination decisions are made, we require shippers to report in the manner below:

- ~~HHMM2 (24 hour format)~~ – the time of becoming aware of an event - at a minimum, that a record is kept that reflects the time a decision was made to renominate.
- ~~Noting the above, we expect:~~
- ~~HHMM1 (24 hour format)~~ – the actual time the event occurred - at a minimum, ~~we expect either~~ that a record is kept that reflects the time of the event which has led to a renomination. If appropriate, this time ~~to~~can be recorded as:

~~the same time as becoming aware of the event or~~

~~to reflect~~ an indicative range of time over which the event or event (s) occurred e.g. 12:00 – ~~13:00~~ 13:00 or 6:00 – 15:00.

~~Furthermore, as noted above, we expect shippers to adopt a consistent practice in such situations.~~

- By way of example, if a *shipper's* line pack balance is building up on an *auction facility* to a point the participant identifies it to be too high and renominates - it would be acceptable to report:
 - the time this decision to renominate was made in HHMM2;

- in HHMM1, to describe an indicative time over which this change occurred; and
- a description ~~indicating~~that includes the context of the line pack build up in the description field.

Another example is, if a shipper becomes aware of an opportunity to meet increased demand (e.g. a customer has requested additional supply) at 9:00 however were only able to secure the additional gas at 13:00 and make the renomination at 17:30 – it would be acceptable to report:

- in HHMM2, the time the shipper became aware of an opportunity to meet increased demand which was at 9:00;
- in HHMM1, the actual time the event occurred that gave rise to the renomination, which was the time the shipper was able to secure the additional gas at 13:00; and
- a description of the background on the situation and the timing of events in the description field.

Description field

~~Detailed-~~The description field must include detailed renomination reasons in the description field will to help the AER ~~to~~ understand, substantiate and verify the reason provided, ~~thereby reducing.~~The description field must include the following:

1. Context explaining the events that led to the renomination;
2. Reason for renomination and why the specific category field option was chosen; and
3. If applicable, any other further guidance on the reason for renomination (optional).

Detailed descriptions will reduce the need for the AER to seek further clarification or information from *shippers* after the event. There ~~will be~~is no character or word limit in the description field ~~so we encourage shippers.~~ Shippers are encouraged to include ~~as much~~ information and further guidance on the reason for renomination in the description field ~~to explain the material conditions or circumstances that led to.~~ Reasons for the *renomination* ~~as part of a~~must be verifiable and specific ~~reason for the renomination.~~ In circumstances where there are multiple ~~material~~ triggers behind a *renomination*, the details of each of these triggers should be recorded.

By way of example for a description field response, if the reason for *renomination* is to manage portfolio imbalance, a *shipper* must also explain the reason for the need to manage such imbalances. A 'managing an imbalance' reason alone makes it difficult for the AER to verify whether the material *renomination* was reasonable. As such, by way of example, it would be acceptable to record the following information under each mandatory description field heading:

1. Background/context explaining the events that led to the *renomination*.

A gas powered generation customer requested additional gas to meet unexpected demand due to increase in temperature from forecasted levels. More gas powered generation was required at XX power station.

2. Reason for *renomination* and why the specific category field option was chosen.

The reason for *renomination* was additional demand from a gas customer. This reason fits into the 'market change' option as the additional demand for gas had a financial and commercial impact. In addition, it can be seen as 'external' from our operational control due to the change in forecast weather and demand.

3. If applicable, any other further guidance on the reason for *renomination*.

The gas powered generation customer requested additional gas at HH:MM (24 hour time). We made the decision to make a *renomination* at HH:MM (24 hour time). The *renomination* was submitted at HH:MM (24 hour time).

Another example of a reason for *renomination* is "nomination cut-off time". *Shippers* must describe the causes behind missing the nomination cut-off time. This could relate to a range of events, so it is important for *shippers* to provide sufficient background and context in the description field. This reason could be due to an oversight by staff, system errors, and poor procedures which would need a detailed description. This list is not inclusive of all of the reasons possible that caused *shippers* to miss the nomination cut off.

3.3 Provision of other information to the AER

As permitted under the NGR, the AER may from time to time, request further information besides the contemporaneous ~~record, which records. This records.~~ This may include:

- supporting notes;
- *shipper* logs;
- reports;

- additional ~~explanation~~explanations;
- emails;
- correspondence with AEMO;
- other communication exchange records; and/or
- any other relevant documentation.

~~However, we consider that the description field in the contemporaneous record may be detailed enough to not require this additional information to be provided with the contemporaneous record. Experience with the auction and the kinds of information being kept in contemporaneous records will dictate our approach.~~

3.4 Time required to keep nomination records

Clause 666(3) of the NGR requires a *transportation facility user* to maintain *renomination* records for a period of five years after the gas day to which the record relates.

3.5 Date records and information must be submitted

There ~~will be~~is no requirement for a *transportation facility user* to submit *renomination* records periodically to the AER. ~~The information need only be required~~ to be submitted to the AER if the AER requests it. For clarity, in contrast to the requirements under the electricity rebidding guideline, there ~~will be~~is no requirement for a *transportation facility user* to notify the AER when an error renomination (E) has been submitted. ~~However, in the event that a transportation facility user identifies a potential breach with the NGR in respect of its renomination records, it should submit a self-report to the AER in accordance with the self-reporting guideline.~~³⁰

³⁰ <https://www.aer.gov.au/wholesale-markets/compliance-reporting/guidance-note-submitting-wholesale-energy-self-reports-to-the-aer>

4 AER's procedures for handling confidential information

In accordance with clause 666(5)(b) ~~of the NGR,~~ this Guideline ~~is to include~~ includes procedures for handling confidential information. The AER will apply the ACCC ~~AER Information policy: The collection, use and disclosure of information (ACCC/AER Information Policy)~~.³¹ The information policy sets out the general policy of the Australian Competition and Consumer Commission and the AER on the collection, use and disclosure of information (including confidential information).

³¹ ~~https://www.accc.gov.au/about-us/publications/acccaer-information-policy~~

Schedule 1: Form of nomination and scheduling records for facility operators

Shipper name	Auction facility	Gas day	Nomination Time (AEST)	Transportation service	Receipt location	Point Delivery location	Nomination (GJ)*	Scheduled Qty (GJ)	Renomination Count
Shipper 1	ABC Pipeline	DD/MM/YYYY	DD/MM/YYYY HH:MM	Firm - FH	X Receipt Point	X Delivery Point	X	X	0
Shipper 1	ABC Pipeline	DD/MM/YYYY	DD/MM/YYYY HH:MM	Backhaul	X Receipt Point	X Delivery Point	X	X	0
Shipper 1	ABC -Compression	DD/MM/YYYY	DD/MM/YYYY HH:MM	Compression	X Receipt Point	X Delivery Point	X	X	0
Shipper 1	ABC Pipeline	DD/MM/YYYY	DD/MM/YYYY HH:MM	TFSR	X Receipt Point	X Power Station	X	X	0
Shipper 1	ABC Pipeline	DD/MM/YYYY	DD/MM/YYYY HH:MM	As available	X Receipt Point	X Delivery Point	X	X	0
Shipper 1	ABC Pipeline	DD/MM/YYYY	DD/MM/YYYY HH:MM	Auction service	X Receipt Point	Y Power Station	X	X	0
Shipper 2	XYZ Pipeline	31/03/2019	29/03/2019 HH:MM14:56	Firm - FH	X Receipt Point	X Delivery Point	10 000	15 000	2
Shipper 2	XYZ Pipeline	31/03/2019	30/03/2019 HH:MM09:04	Firm - FH	X Receipt Point	X Delivery Point	20 000	15 000	2
Shipper 2	XYZ Pipeline	31/03/2019	31/03/2019 HH:MM11:20	Firm - FH	X Receipt Point	X Delivery Point	15 000	15 000	2
Shipper 3	ABC Pipeline	31/03/2019	30/03/2019 HH:MM	TFSR	X Receipt Point	X Power Station	X	Y	1
Shipper 3	ABC Pipeline	31/03/2019	31/03/2019 HH:MM	TFSR	X Receipt Point	X Power Station	Y	Y	1

Example

*Do not include all requested nominations, only nominations that have been approved or scheduled

NOTE: Nominations for receipt and delivery points do not need to be reported in a single row

Schedule 2: Form of renomination records for shippers

<u>Record Creator</u>	<u>Record timestamp (AEST)</u>	Category		Gas day	Time of event (AEST)	Time shipper noticed (AEST)	Auction Facility	Transportation Service ³²	<u>Reason</u> <u>Description/reason(s) for renomination</u>
<u>Name</u>	<u>HH:MM</u> <u>DD/MM/YYYY</u>	P	Plant or physical change	DD/MM/YY YY	DD:MM HH:MM1	DD:MM HH:MM2	EGP	Auction	<p><u>Background/context:</u></p> <ul style="list-style-type: none"> <u>Longford supply constrained at HH:MM on DD/MM/YYYY.</u> <p><u>Reason for renomination and category:</u></p> <ul style="list-style-type: none"> <u>Longford supply constrained affecting deliveries to NSW</u> <u>Planned outage, Plant or maintenance physical change category as change directly impacted flows on pipeline X.</u> <p><u>Further guidance (if applicable):</u> N/A</p>
<u>Name</u>	<u>HH:MM</u> <u>DD/MM/YYYY</u>	M	Market Change	DD/MM/YY YY	DD:MM HH:MM1	DD:MM HH:MM2	MAPS	Firm — FH	<p><u>Background/context:</u></p> <p>Ambient temperature hotter than forecast more GPG required at XX PS</p> <ul style="list-style-type: none"> — AEMO direction to increase generation in SA <p>Change in portfolio, customer demand decline in QLD Portfolio imbalance redistribution</p> <p><u>Reason for renomination and category:</u></p> <ul style="list-style-type: none"> — <u>AEMO direction to increase generation in SA</u> <u>Change in portfolio, customer demand decline in QLD Additional demand from for gas from GPG customers. Market change category as additional demand driven by external factor of change in forecast weather.</u> <p><u>Further guidance (if applicable):</u></p>

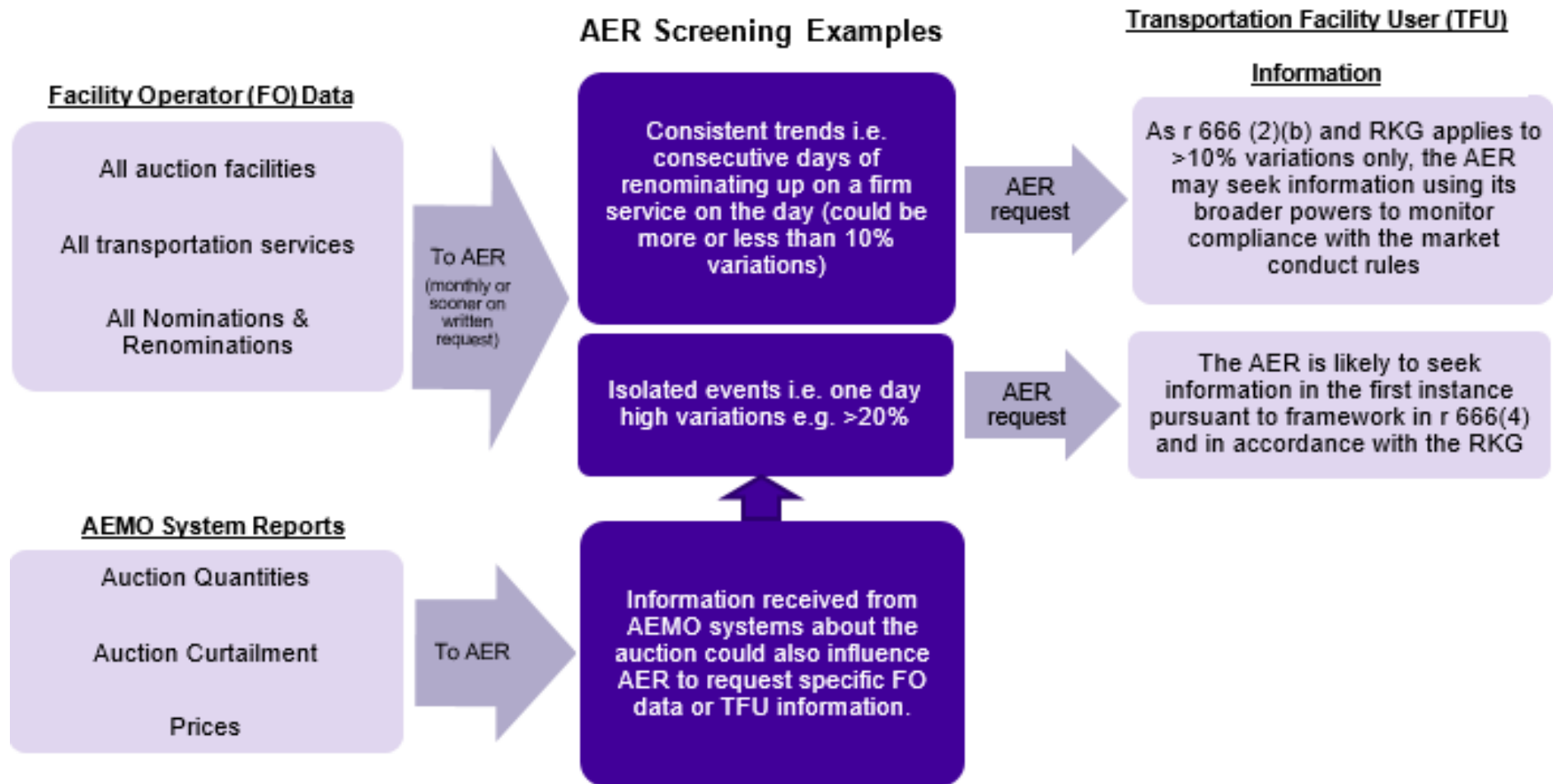
³² If a transportation service cannot be determined, please specify that it is undetermined. We note the obligation for a *shipper* to record material renominations still remains ~~(see under examples, 3.1).~~

									<ul style="list-style-type: none"> <u>Portfolio imbalance redistribution</u>The GPG customer requested additional gas at HH:MM. We made the decision to make a renomination at HH:MM. The renomination was submitted at HH:MM.
<u>Name</u>	<u>HH:MM</u> <u>DD/MM/YYYY</u>	<u>MA</u>	<u>Market change identified or caused by AEMO</u>	<u>DD/MM/YY</u> <u>YY</u>	<u>DD:MM</u> <u>HH:MM1</u>	<u>DD:MM</u> <u>HH:MM2</u>	<u>EGP</u>	<u>Auction</u>	<p><u>Background/context:</u></p> <ul style="list-style-type: none"> <u>AEMO threat to system security notice on 19 July 2022 directed all market participants to cease purchasing gas from the DWGM for electricity generation.</u> <p><u>Reason for renomination and category:</u></p> <ul style="list-style-type: none"> <u>AEMO direction influenced by rapidly depleting storage levels at the Iona storage facility. Market change caused by AEMO due to market dynamics.</u> <p><u>Further guidance (if applicable):</u></p> <ul style="list-style-type: none"> <u>This AEMO threat to system security will remain until 30 September 2022.</u>
<u>Name</u>	<u>HH:MM</u> <u>DD/MM/YYYY</u>	<u>E</u>	<u>Error</u>	<u>DD/MM/YY</u> <u>YY</u>	<u>DD:MM</u> <u>HH:MM1</u>	<u>DD:MM</u> <u>HH:MM2</u>	<u>MSP</u>	<u>Firm -FH</u>	<p><u>Background/context:</u></p> <ul style="list-style-type: none"> <u>Staff previously rebid/submitted at HH:MM the incorrect amount.</u> <p><u>Reason for renomination and category:</u></p> <ul style="list-style-type: none"> <u>Error in previous rebid/submission. Error category as it was a mistake by staff.</u> <p><u>Further guidance (if applicable):</u> N/A</p>

Name	<u>HH:MM</u> <u>DD/MM/YYYY</u>	<u>EO</u>	Error made by <u>third party</u>	<u>DD/MM/YY</u> <u>YY</u>	<u>DD:MM</u> <u>HH:MM1</u>	<u>DD:MM</u> <u>HH:MM2</u>	<u>MAPS</u>	<u>Firm – FH</u>	<p><u>Background/context:</u></p> <ul style="list-style-type: none"> <u>Customer X made an error when submitting information to a facility transport user. They mistakenly added an extra digit to their figure.</u> <p><u>Reason for renomination and category:</u></p> <ul style="list-style-type: none"> <u>Error in previous rebid/submission. EO category as it was a mistake by third party X.</u> <p><u>Further guidance (if applicable):</u> N/A</p>
Name	<u>HH:MM</u> <u>DD/MM/YYYY</u>	<u>ER</u>	Request or direction made by <u>facility operator</u>	<u>DD/MM/YY</u> <u>YY</u>	<u>DD:MM</u> <u>HH:MM1</u>	<u>DD:MM</u> <u>HH:MM2</u>	<u>MAPS</u>	<u>Auction</u>	<p><u>Background/context:</u></p> <ul style="list-style-type: none"> <u>Shipper has been drawing down gas stored on pipeline X in recent days. Shipper is notified by pipeline X that they have drawn down more gas than they had stored receives a direction from pipeline X to discontinue and make good on the overdrawn quantity of gas.</u> <p><u>Reason for renomination and category:</u></p> <ul style="list-style-type: none"> <u>Request or direction made by facility operator. ER category as it was a direction by facility operator X.</u> <p><u>Further guidance (if applicable):</u> N/A</p>

Schedule 3: Reporting and Monitoring framework

Day Ahead Auction – High Level description of reporting and monitoring framework*



*This flow diagram does not include all the information the AER may use when monitoring compliance with the [DAA](#) market conduct [and nomination](#) rules—[ether](#). Other sources of information would include [information under our general power in section 42 of the NGL](#), market intelligence, Gas Bulletin Board data, and National Electricity Market data.