

Santos

**AER DAY AHEAD AUCTION RECORD KEEPING
GUIDELINES - VERSION 2 FEEDBACK**

DUE 5TH JULY

Item	Santos Comments
<p>Section 3.2 / Table 2</p> <p>Description/reason for <i>renomination</i></p> <ol style="list-style-type: none"> 1. Is a verifiable description of the events or occurrences that explain the renomination. This must include: Background/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). There is no character limit for this field. 	<p>In relation to item 2, it is unclear how this information will assist the AER to substantiate and verify the reasons for a material renomination. This is based on the following:</p> <ul style="list-style-type: none"> • There does not appear to be a clear distinction between the information provided as 'Background/context' and 'Reason for renomination'. In the examples provided in the draft guidelines, the 'Reason for renomination' appears to duplicate the explanation already provided in the 'Background/context' section. • The definition of the category fields in the guidelines is sufficiently detailed, meaning in most cases specifying 'why the specific category field option was chosen' would just be duplicating this. • The category field is simply a label selected for each record, and adding further context as to why it was chosen does not change the event which led to the renomination. <p>Santos considers that a verifiable description and other information provided under item 1 is sufficient and can be relied upon to verify the renomination. As such, items 2 and 3 should be optional and used only where additional context is required.</p>

Section 3.2 / Example description

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).

Santos provides the following feedback on the example description in Section 3.2 of the draft guideline:

- For the section highlighted blue, the customer may not always provide this level of detail regarding what the gas is being used for or why it is being requested. If this information is not volunteered by the customer, it would be unreasonable for the shipper to assume it.
- The section highlighted pink does not provide any further context or information than has already been provided in the 'Background/context' section.
- The section highlighted green is simply repeating information which is in the category definitions provided in the draft guidelines. In addition, there is information used which the customer may not provide.