



15 November 2018

Australian Energy Regulator
GPO Box 520
Melbourne Vic 3001

BY EMAIL

Consultation Paper – Day Ahead Auction Record Keeping Guideline - December 2018

APA welcomes the opportunity to respond to AER's Consultation Paper on the reporting requirements for the Day Ahead Auction. APA is the facility operator for a number of transmission pipeline and compression assets that will be subject to auction from 1 March 2019 and as such this submission relates to the obligations for Facility Operators only.

In general APA is supportive of the approach that the AER has proposed with respect to the keeping and provision of records required under the auction and offer the following comments in relation to the specific requirements raised in section 5 of the paper:

- Transportation service direction for bi-directional pipelines is generally included as a part of the Transport Service Name rather than as a separate attribute as such this may require a system change to add another attribute
- Nomination cut off times are asset specific so rather than include this time in each row of data it may be more practical to provide a separate list for each facility – these times will become standard post harmonisation
- Schedule 1 shows a single nomination applying to both a receipt and a delivery point where as in practice nominations generally relate to either a receipt or a delivery stream. A single service may have multiple receipt and delivery points and the shipper nominates an aggregate amount to the point rather than each specific receipt/delivery combination
- Some transport service nominations also result in compression service requirements which are not specifically separated at the nomination stage against a pressure service
- The description of renomination count and the example in Schedule 1 appear at odds with the requirement to track intra-day renominations that occur after the nomination deadline. Shippers may make several nominations prior to the nomination deadline (i.e. D-2) and these will have no impact on auction quantity calculations, it is only after the nomination deadline that auction quantities are calculated. Additionally the renomination count that is currently calculated in our systems increases with each intra-day renomination specifying the order in which they have been made rather than applying the total count to all renominations as shown in Schedule 1. Given that intraday nominations are processed at various times during the day it would be difficult to apply the final renomination count at the end of the gas day to records that may have been processed at the start of the gas day.

- Identification of market generating units for any transitional firm services would be better achieved through a separate report or as part of the registration rather than as part of the report given the expected limited number of these services.

APA would be pleased to discuss this submission and provide further information which may assist the AER. In the first instance please contact me on 07 3323 6023.

Yours sincerely



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