



# **Day Ahead Auction Record Keeping Guideline (For Consultation)**

December 2018

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# Contents

Contents .....	2
Glossary.....	4
1 Public consultation process .....	5
2 Preliminary Consultation.....	7
2.1 Facility Operators .....	7
2.2 Transportation Facility Users (Shippers) .....	8
3 Issues raised in October workshops .....	9
3.1 Distinguishing Auction and Firm Renominations.....	9
3.2 Renomination Reasons - primary categories.....	9
3.3 Renomination Records – noting two event times.....	9
3.4 Renomination Reasons – Firm transportation services.....	10
4 Introduction .....	11
4.1 Purpose of this Guideline .....	11
4.2 Roles and functions of the AER .....	12
4.3 Records must comply with the information standard .....	13
4.4 Process for Guideline revision .....	13
4.5 Definitions and interpretation.....	13
4.6 Monitoring Framework and this Guideline .....	13
5 Facility Operators .....	14
5.1 Reporting requirements .....	14
5.2 Transitional obligations during the first two years.....	14
5.3 Form of nomination and scheduling records.....	15
5.4 Time required to keep records .....	16
5.5 Date information and data must be submitted.....	16
6 Transportation Facility Users .....	18
6.1 Reporting Requirements - Material Renominations .....	18
6.2 Provision of contemporaneous records to AER .....	19

6.3 Provision of other information to the AER .....	22
6.4 Time required to keep nomination records .....	23
6.5 Date records and information must be submitted .....	23
7 AER's procedures for handling confidential information .....	23
Schedule 1: Form of nomination and scheduling records .....	24
Schedule 2: Form of renomination records .....	25
Schedule 3: Reporting and Monitoring framework .....	26

# 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	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 Rules
Renomination records	Contemporaneous Renomination Records
RKG	Record Keeping Guideline
Shipper	Transportation Facility User
TFSR	Transitional Firm Service Rights

# 1 Public consultation process

Part 25 of the National Gas Rules (NGR) sets out a framework for the day ahead auction (DAA) of pipeline or compressor capacity on registered auction facilities.

The Australian Energy Regulator (AER) is responsible for monitoring the DAA to ensure service providers, auction participants and transportation facility users (shippers) comply with the DAA market conduct and nomination rules. To facilitate oversight of the DAA, facility operators and shippers will be required to keep specified nomination, renomination and scheduling data and information. Part 25 of the NGR will require the AER to publish guidelines as to the manner and form in which this data and information are to be kept. This document set out from section 4 constitutes the AER's guidelines, referred to as the "DAA Record Keeping Guideline".

Under Part 25 of the NGR the initial DAA Record Keeping Guideline must be published by 1 December 2018. This will enable facility operators and shippers time to establish systems for DAA commencement on 1 March 2019. The NGR provides for the AER to amend the DAA Record Keeping Guideline (RKG) over time.

The AER is seeking feedback on the DAA Record Keeping Guideline (RKG) set out from Section 4. **This Guideline reflects AER staff views.** We have taken account of the costs to industry and the short time for systems to be implemented for DAA start on 1 March 2019. The Guideline includes scope for allowing variations between businesses as to how they record and report data and information, provided certain mandatory matters are included.

Given the tight timeframes we request submissions be provided by 15 November 2018. Submissions can be sent to [AERGasMarketsPipelineCapacityTrading@aer.gov.au](mailto:AERGasMarketsPipelineCapacityTrading@aer.gov.au) with the following title in the email: Day Ahead Auction Record Keeping Guideline. Submissions received will be made available on the AER's website ([www.aer.gov.au](http://www.aer.gov.au)).

We prefer that all submissions be publicly available to facilitate an informed and transparent consultative process. Submissions will be treated as public documents unless otherwise requested. Parties wishing to submit confidential information should:

- clearly identify the information that is the subject of the confidentiality claim; and
- provide a non-confidential version of the submission in a form suitable for publication.

We will place all non-confidential submissions on our website. For further information regarding our use and disclosure of information provided to us, see the ACCC/AER Information Policy (June 2014), which is available on our website.

This DAA RKG for consultation has been informed by staff engagement with industry through:

- AEMO facilitated pipeline capacity trading working group meetings;
- individual consultation with facility operators and shippers; and
- workshops on 19 October (facility operators) and 22 October (shippers).

We discuss the main findings from our preliminary consultation and the key issues raised in our October workshops in the next section.

## 2 Preliminary Consultation

Over 2018 AEMO has been facilitating Pipeline Capacity Trading Reference Groups. AER staff presented at these Groups in August, September and October on its DAA roles and its preliminary views on the DAA Record Keeping Guideline. Our preliminary consultation involved all DAA facility operators and many shippers and fed into our October workshops discussed in the next section.

### 2.1 Facility Operators

Part 25 will require facility operators to schedule gas in accordance with the auction service priority principles. These provide that firm nominations rank above auction nominations and auction nominations rank above as available/interruptible nominations for scheduling.<sup>1</sup> The AER will be empowered to collect records of nominations and renominations of transportation services to conduct its roles under Part 25, in particular, market conduct monitoring. Accordingly, staff sought information from all facility operators as to the form and content of data that they presently collect and keep, and the magnitude of the data (the number of transportation services, day ahead nominations and renominations).<sup>2</sup> Some findings were:

- There are differences between how facility operators are keeping nominations and renominations in their data systems and also differences between how that data can be exported to an Excel spreadsheet.
- As the data is currently kept by most operators, receiving data monthly (starting with first month data in April 2019) via an Excel spreadsheet will enable the AER to review renomination trends.
- One facility operator was not keeping all renomination data in a form which enabled renominations to be exported to an Excel spreadsheet. The AER requires renomination data to be provided in an Excel spreadsheet format in order to properly monitor compliance with the scheme. Therefore, unless a workable alternative can be identified, we will be requiring all facility operators to provide information in an Excel spreadsheet form, recognising that this may require changes in practice and costs for some businesses.

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<sup>1</sup> Some as available services which qualify may be registered as transitional firm services and rank above the auction products.

<sup>2</sup> NGR cl XXX.



Our Guideline set out from section 4 outlines mandatory fields for facility operators to report on. It also provides the timing of when we expect data to be reported.

## **2.2 Transportation Facility Users (Shippers)**

Part 25 of the NGR will contain a number of market conduct prohibitions for the DAA applying to shippers - including that nominations and renominations when made must not be false or misleading. The NGR will provide that a material change in conditions and circumstances constitutes a legal basis for renominating. Shippers will be required to keep records when they make material renominations – defined by a 10% magnitude variance. These records are designed to support the AER monitoring whether these material renominations are made following a material change in conditions and circumstances, as the AER monitors compliance with market conduct rules.

Based on discussions with shippers, our findings were that:

- a number of participants considered it would be easier to record a reason for every renomination, rather than attempting to capture when a single nomination or series of nominations passed the materiality threshold; and
- a number of participants were able to give staff potential example reasons for renominations that could be characterised under a common category.

Our Guideline provides the mandatory information we expect shippers to keep and states the potential timing of when we expect data to be reported to the AER upon the capacity auction start date.

## **3 Issues raised in October workshops**

Following the preliminary consultations discussed above, the AER circulated two sets of workshop slides for discussion with facility operators and transportation users on 19 October 2018 (facility operator workshop) and 22 October 2018 (shipper workshop).

### **3.1 Distinguishing Auction and Firm Renominations**

Shipper workshop participants indicated that in submitting nominations to some facility operators they were unclear how these renominations might be distinguished between renominations affecting auction services and firm services. This was in the context of determining whether there has been a 10% variation (this being “material”) for the purposes of keeping a contemporaneous record.

Further consultation with facility operators after the workshop indicated they would distinguish between nominations and renominations made for firm services and auction services in their systems – as required for scheduling and market operation - and therefore in data which will be routinely provided to the AER.

The Rules specify that the 10% variation is to be measured by transportation service. For example, if a firm shipper nominates 30 TJ of firm capacity and 10 TJ of auction capacity on an auction facility, either a 3 TJ (firm nomination) or a 1 TJ renomination (auction nomination) would trigger this requirement. The transportation facility user would therefore need to make itself aware of which service it is renominating against to know whether the rules require a contemporaneous record to be kept.

### **3.2 Renomination Reasons - primary categories**

Following shipper workshop feedback, this Guideline for consultation has simplified and reduced the number of primary category reasons for shipper reporting of contemporaneous records and also provided guidance as to how to classify renominations into these categories.

### **3.3 Renomination Records – noting two event times**

Shipper workshop participants queried the need to provide a contemporaneous record of the time that an event occurred leading to a need to renominate, separately from also providing the time of becoming aware that that event occurred. They noted that this contemporaneous record keeping requirement was similar to the NEM late rebidding

provisions in clause 3.8.22(ca) of the National Electricity Rules. We expect shippers to keep a record of both times, consistent with Part 25 of the Rules.

### **3.4 Renomination Reasons – Firm transportation services**

Shipper workshop participants indicated uncertainty as to which firm transportation services to record material renominations for. Specific examples raised were understanding which services affect the Wallumbilla and Iona Compression facility. We expect shippers to consult with facility operators to determine which transportation services are taken into account in the calculation of the auction quantity limit as the Rules will specify these as the relevant services for which material renomination records must be kept.

## 4 Introduction

The National Gas Rules (NGR) require the Australian Energy Regulator (AER) to develop and publish Nomination and Scheduling Records Guidelines and Renomination Records Guidelines<sup>3</sup> (together, “Record Keeping Guideline” or “Guideline”). This document is our **Guideline**.

### 4.1 Purpose of this Guideline

The purpose of this Guideline is to set out the manner and form in which auction facility operators and transportation facility users must make, 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.

We note that, in addition to setting the manner and form in which affected parties must keep records under Part 25 of the Rules, this Guideline also includes discussion of the relevant obligations in the Rules as to when records must be kept, and what must be recorded. However, this Guideline is not a substitute for the Rules, and to the extent of any inconsistency between this Guideline and the Rules, the Rules prevail.

Rule XXX requires that a *facility operator* make, maintain and keep *nomination, renomination* and scheduling information in *nomination and scheduling records*.<sup>4</sup> 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 the manner in which the records are to be made and kept.<sup>5</sup> This document constitutes those guidelines.

Rule XXX requires that a *transportation facility user* make, maintain and keep a contemporaneous record of material renominations (renomination records) of firm or auctions services.<sup>6</sup> The AER is required under the NGR to set out through this Guideline the amount of detail to be included in the *renomination* records (including through contemporaneous records). Under rule XXX, the AER is also required to set out the AER’s process for handling confidentiality claims.

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<sup>3</sup> NGR cl XXX.

<sup>4</sup> NGR cl XXX.

<sup>5</sup> NGR cl XXX.

<sup>6</sup> NGR cl XXX. In relation to firm services, the requirements relates to all transportation services taken into account in the calculation of the auction quantity limit which can for example also include transitional firm services if registered

The AER is empowered under the NGR to request records which are kept by facility operators and transportation facility users in accordance with rules XXX and XXX and this Guideline.

## 4.2 Roles and functions of the AER

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

Our functions for the DAA include:

- monitoring day-ahead nominations, renominations and activity in the capacity auction to ensure that transportation service providers, auction participants and transportation facility users comply with the DAA market conduct and nomination rules;<sup>7</sup>
- certifying the existence of Transitional Firm Service Rights (TFSR) for an auction day for the first 2 years of the market, and monitoring their usage;<sup>8</sup> and
- 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*.<sup>9</sup>

We are committed to ensuring industry compliance with the Rules 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 Part 25 compliance generally.

The AER will monitor, investigate and enforce compliance with the NGL and NGR in relation to the DAA from the *capacity auction start date* in each participating jurisdiction.

Our *Compliance and Enforcement - Statement of Approach* available on our website,<sup>10</sup> 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.

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<sup>7</sup> NGR cl XXX.

<sup>8</sup> NGR Transitional provisions, Pt X, cl XXX.

<sup>9</sup> NGR cl XXX.

<sup>10</sup> <https://www.aer.gov.au/publications/corporate-documents/aer-compliance-and-enforcement-statement-of-approach>

We anticipate that further information on our compliance and monitoring approach will be provided on our website prior to capacity auction in an **AER Guidance Note for the Capacity Auction Record Keeping Reform**.

### 4.3 Records must comply with the information standard

The Rules require 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.<sup>11</sup> We expect that records, information and data provided to the AER is at a standard that reflects ‘Good Gas Industry Practice’.

### 4.4 Process for Guideline revision

The Rules will allow the AER to amend the Guideline from time to time in accordance with the requirements of the NGR.<sup>12</sup> We will review and amend the Guideline as we consider appropriate. A version number and effective date of issue will identify every version of the Guideline.

The AER is not required to comply with the standard consultative procedure in developing the initial Guideline.<sup>13</sup> However, subsequent revisions to the Guideline will be made in accordance with the standard consultative procedure set out in rule 8.<sup>14</sup>

### 4.5 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.

### 4.6 Monitoring Framework and this Guideline

As indicated in **Schedule 3**, the AER’s information requests to monitor the market conduct rules will not solely rely on Rule XXX and XXX and the Guideline. In particular, we may seek information on renominations which are not material renominations as defined in rule XXX where nevertheless we are concerned as to compliance with the market conduct rules.

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<sup>11</sup> NGR cl XXX.

<sup>12</sup> NGR cl XXX.

<sup>13</sup> NGR cl XXX.

<sup>14</sup> NGR cl XXX.

## 5 Facility Operators

### 5.1 Reporting requirements

The Rules require a *facility operator* to make and maintain *nomination*, *renomination* and scheduling records for each of their auction facilities and 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 include information on the quantity nominated and the time the day-ahead nomination was made;
- Renominations that occur following nomination cut-off time, which will include information on the quantity renominated and the time the *renomination* was made; and
- The scheduled quantity for each service provided by means of the facility.<sup>15</sup>

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

- gas day;
- *transportation facility user*;
- *auction facility*; and
- *transportation service*.<sup>16</sup>

The Rules allow the AER to obtain *nomination and scheduling records* from facility operators at any time, upon written request.

### 5.2 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:

- 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

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<sup>15</sup> NGR, cl XXX.

<sup>16</sup> NGR, cl XXX.

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*.<sup>17</sup>

### 5.3 Form of nomination and scheduling records

*Nomination and scheduling records* must be kept such that they can be submitted to the AER in an Excel spreadsheet. These records must include the following fields specified below, as outlined in **Schedule 1**. Facility operators may include additional information in the *nomination and scheduling records* provided that the fields specified below are included. The rows shaded in grey are transitional obligations related to TFSR.

Where:

<b>Gas day</b>	The gas date for which the nomination or renomination is made. Expressed as: day-month-year (DD/MM/YYYY).
<b>Time</b>	The time, in 24 hour format: HH:MM
<b>Transportation facility user</b>	The name of the shipper
<b>Auction facility</b>	The name of the pipeline or compression station
<b>Transportation service</b>	<p>A description of the type of transportation product. This should include:</p> <ul style="list-style-type: none"> <li>• firm forward haul,</li> <li>• as available,</li> <li>• backhaul,</li> <li>• compression, and</li> <li>• auction</li> </ul> <p>If the pipeline is bi-directional, the direction of the service must be clear.</p>
<b>Scheduled quantity</b>	Must be expressed in GJ
<b>Day-ahead nomination(s) and Renomination(s)</b>	<p>Must be expressed in GJ</p> <p>Nomination cut-off time means the facility operator's cut-off time</p> <p>Do not need to include nominations of 0 GJ that have not been renominated</p>

<sup>17</sup> NGR cl XXX.



	Do not include all requested nominations by shippers, only nominations that are approved and scheduled.
<b>Receipt point location</b>	Must be consistent with receipt point(s) as reported to the Bulletin Board
<b>Delivery Point location</b>	Must be consistent with delivery point(s) as reported to the Bulletin Board
<b>Renomination Count</b>	The number of times the first nomination that has been requested and approved for a gas day has been revised. For example, if a shipper nominates 10 000 GJ at D- 2, renominates upwards to 20 000 GJ on D -1 then renominates downwards on the gas day to 15 000GJ, the renomination count is 2 (see Example 1 in <b>Schedule 1</b> )
<b>Transitional firm quantity</b>	Must be expressed in GJ
<b>Market generating unit</b>	The name of the gas powered generator
<b>Any renomination of transitional firm quantity</b>	Must be flagged or identifiable

## 5.4 Time required to keep records

The Rules require a *facility operator* to maintain *nomination and scheduling records* for a period of five years after the gas day to which the records relate.<sup>18</sup>

## 5.5 Date information and data must be submitted

The AER requires that a *facility operator* give *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.<sup>19</sup>

We consider 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 for a particular day or period within the month in certain

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<sup>18</sup> NGR cl XXX.

<sup>19</sup> NGR cl XXX.

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.

## 6 Transportation Facility Users

### 6.1 Reporting Requirements - Material Renominations

The Rules require a *transportation facility user* to make a contemporaneous *renomination* record (renomination record) that provides a verifiable and specific reason for any 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.

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.

#### **Material *renomination***

A *renomination* 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 of the following:

- 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.<sup>20</sup>

#### Example 1 – Stand Alone

The day before the gas day, a shipper wins 100TJ 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 percent between the *renomination* of 80TJ and the initial nomination of 95 TJ.

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<sup>20</sup> NGR cl XXX.

## 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 110TJ. This is a material *renomination* as there is a variation of more than 10 percent for these renominations taken together from the final nomination before cut-off.

We are cognisant of the difficulties for some shippers' systems to identify material renominations for firm and 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.

## 6.2 Provision of contemporaneous records to AER

Where the AER makes a written request to substantiate and verify a material *renomination*, we expect a contemporaneous record to be provided which includes the fields specified below and contains the detail also noted. An example of how this record may be reported is provided in **Schedule 2**.

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

Where:

<b>Category</b>	May be either P for a plant or physical change, M for market change or E for a renomination to address an error
<b>Gas day</b>	The gas date for which the renomination is made. Expressed as: day-month-year (DD/MM/YYYY)
<b>Auction facility</b>	The name of the pipeline or compression station
<b>Transportation service</b>	A description of the type of transportation product. This should include: <ul style="list-style-type: none"><li>• firm forward haul,</li><li>• as available,</li><li>• backhaul,</li><li>• compression, and</li><li>• auction</li></ul>
<b>HHMM1</b>	The time, in 24 hour format, when the event(s) or other occurrence(s)

	<p>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>
<b>HHMM2</b>	<p>The time, in 24 hour format, when the shipper 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>
<b>DDD...DD</b>	<p>Is a verifiable description of the events or occurrences that explain the renomination.</p> <p>There is no character limit for this field</p>

### **Category field**

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.

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.

We consider the market change category to be wider than the category for plant or physical change which should be used to categorise changes that specifically relate to facility:

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

The reasons listed under these 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)***

The Rules 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. Shippers are also uncertain how much differentiating the two times will assist to explain material conditions and circumstances on which the *renomination* was based.

Also, we understand 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.

Noting the above, we expect:

- **HHMM2** – 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.
- **DDD...DD** – the verifiable description – that the event or events that caused the decision to renominate be listed in the description field (see under *Description Field* below).
- **HHMM1**- the actual time the event occurred - at a minimum we expect either this time to 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 – 1300 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,
- a description indicating the line pack build up in the description field; and
- in HHMM1 to describe an indicative time over which this change occurred.

### ***Description field***

Detailed *renomination* reasons in the description field will help the AER to understand, substantiate and verify the reason provided, thereby reducing the need to seek further clarification or information from shippers after the event. There will be no character or word limit in the description field so we encourage shippers to include as much information in the description field to explain the material conditions or circumstances that led to the *renomination*. In circumstances where there are multiple triggers leading up to a *renomination*, we expect that details of each of these triggers should be recorded.

## **6.3 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 may include:

- supporting notes
- shipper logs
- reports
- additional explanation
- emails
- correspondence with AEMO
- other communication exchange records or
- any other 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.

## 6.4 Time required to keep nomination records

The Rules require a *transportation facility user* to maintain *renomination* records for a period of five years after the gas day to which the record relates.<sup>21</sup>

## 6.5 Date records and information must be submitted

There will be no requirement for a *transportation facility user* to submit *renomination* records periodically to the AER. The information need only be required if the AER requests it.

## 7 AER's procedures for handling confidential information

In accordance with the Rules,<sup>22</sup> this Guideline is to include 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).<sup>23</sup> 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).

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<sup>21</sup> NGR cl XXX.

<sup>22</sup> NGR cl XXX.

<sup>23</sup> <https://www.aer.gov.au/system/files/ACCC-AER%20Information%20Policy%202014.pdf>.



## Schedule 1: Form of nomination and scheduling records

Example

Shipper name	Auction facility	Gas day	Nomination Time	Transportation service	Receipt Point location	Delivery point 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:MM	Firm - FH	X Receipt Point	X Delivery Point	10 000	15 000	2
Shipper 2	XYZ Pipeline	31/03/2019	30/03/2019 HH:MM	Firm - FH	X Receipt Point	X Delivery Point	20 000	15 000	2
Shipper 2	XYZ Pipeline	31/03/2019	31/03/2019 HH:MM	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

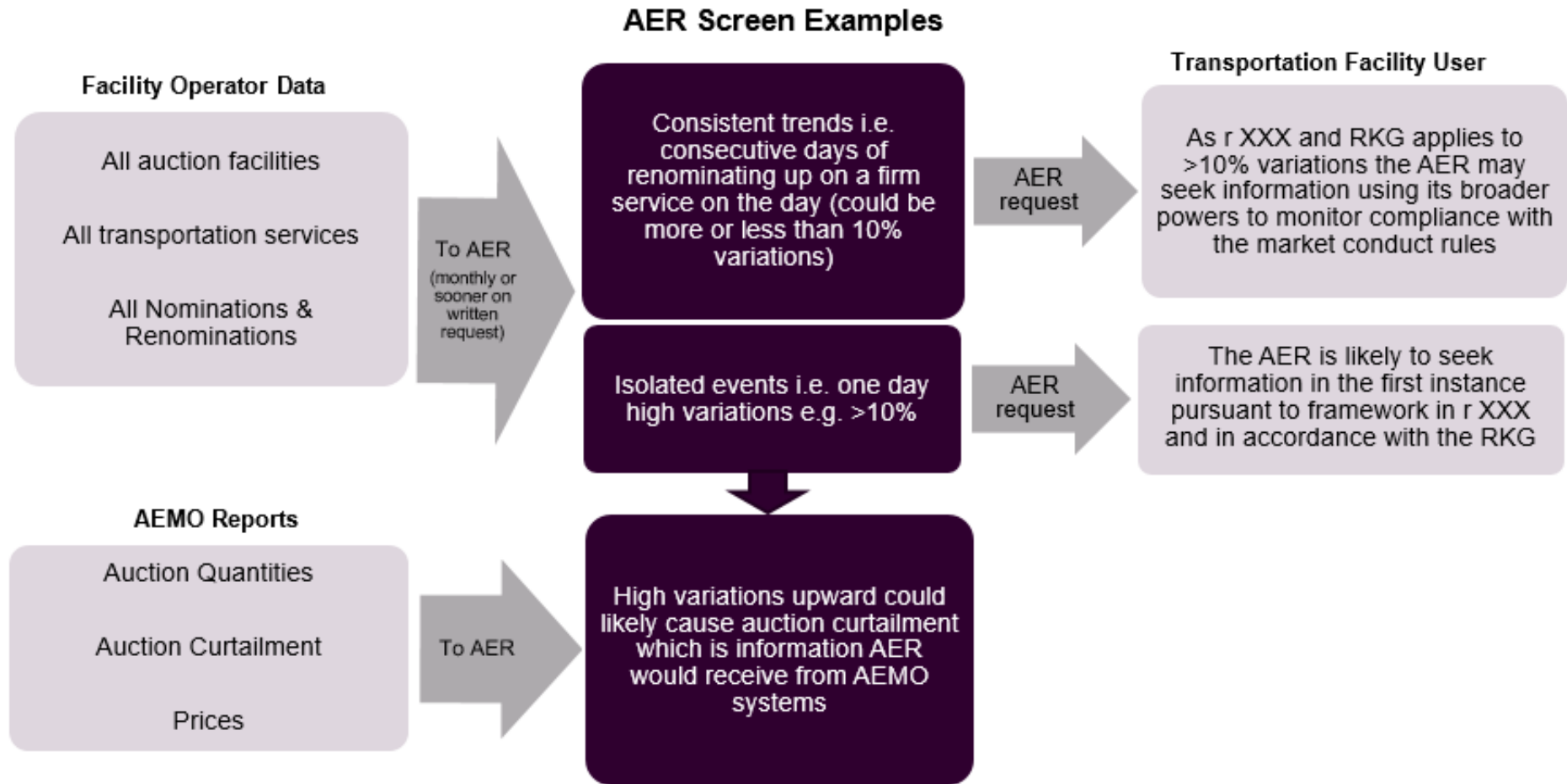
\*Do not include all requested nominations, only nominations that have been approved or scheduled

## Schedule 2: Form of renomination records

Category		Gas day	Time of event	Time shipper noticed	Auction Facility	Transportation Service	Reason(s) for renomination
P	Plant or physical change	DD/MM/YYYY	DD:MM HH:MM1	DD:MM HH:MM2	EGP	Auction	<ul style="list-style-type: none"> <li>• Longford supply constrained affecting deliveries to NSW</li> <li>• Planned outage or maintenance on pipeline</li> </ul>
M	Market Change	DD/MM/YYYY	DD:MM HH:MM1	DD:MM HH:MM2	MAPS	Firm - FH	<ul style="list-style-type: none"> <li>• Ambient temperature hotter than forecast more GPG required at XX PS</li> <li>• AEMO direction to increase generation in SA</li> <li>• Change in portfolio, customer demand decline in QLD</li> <li>• Portfolio imbalance redistribution</li> </ul>
E	Shipper error	DD/MM/YYYY	DD:MM HH:MM1	DD:MM HH:MM2	MSP	Firm -FH	<ul style="list-style-type: none"> <li>• Error in Previous Rebid/Submission</li> </ul>

# 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 market conduct rules – other sources of information would include market intelligence, Gas Bulletin Board data, and National Electricity Market data.