

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 Table A and Table B of the consultation paper.

Stakeholder details

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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>Santos considers this requirement to be 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 events(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?</p> <p>If not, what changes to the proposed wording would you recommend?</p>	<p>Santos supports this amendment in principle, but notes that the proposed wording is not substantively different from the original guideline.</p> <p>To provide further clarity, Santos suggests the AER provide fully completed examples for common renomination scenarios. This would assist shippers to understand the AER’s expectations for these reporting fields and the times which need to be recorded. Examples that could be completed include those set out at Schedule 2 of Attachment B of the AER’s Consultation Paper and Questionnaire. Additional scenarios the AER could use as examples include:</p> <ul style="list-style-type: none"> • Pipeline imbalance corrections in response to allocation report received from pipeline operator • Renomination due to a change in supply from a production facility

	<ul style="list-style-type: none"> • Renomination due to intraday change in DWGM schedule • Renomination due to matching for a trade on the GSH
<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>Santos supports this amendment.</p>
<p>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>	<p>Santos supports the addition of a record timestamp reporting field but suggests that the AER provide further guidance, including a number of examples, on the creation of a contemporaneous record in various circumstances.</p>
<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?</p>	<p>Santos supports this amendment.</p>
<p>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?</p>	<p>Santos seeks further clarification on this proposal, noting that the majority of transportation services have multiple receipt and delivery points. Similar to the comments above, worked examples of what the AER expects would be useful for this point.</p>

7. Do you think the proposed requirement to include the following information in the description reporting field offers specific clarity for the AER to verify the specific reason for material renomination and ensure that there is sufficient detail?

- 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.**

Santos supports this amendment in principle but seeks further clarification, including completed examples, on the level of detail expected by the AER for common renomination scenarios and also on the form the “description reporting field” must take e.g. whether the a. to c. headings need to be explicitly included.

The obligation to include ‘detailed information’ may also lead to unnecessary duplication of data. It is common for shippers to use multiple systems to record information relating to operational data and decisions. Santos believes it should be acceptable, where information needs to be captured in a contemporaneous record and it is also recorded in a different system, that this information is not duplicated but can be referenced in the contemporaneous record. This would not remove the requirement to keep and maintain the contemporaneous record, but remove duplication across different systems.

Santos suggests that the AER provide examples of completed “description reporting fields” for common renomination scenarios.

General questions

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?

The addition of new reporting fields and recording of new information will require system changes which may be an impediment to some shippers.

<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>If not, why not?</p>	<p>Yes, the proposed amendments are proportionate and appropriate to aid facility operator and shipper compliance because the requirement for keeping contemporaneous records is a fundamental way to ensure all operators are compliant.</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>Facility operators and shippers will incur costs to update their record keeping systems to include new reporting fields and record new information. The addition of new reporting fields is likely to be a one off cost and therefore proportionate and appropriate.</p> <p>Some facility operators and shippers may need to upgrade their record keeping system entirely to comply 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>Santos has identified in the rows above some proposed amendments that it considers are ambiguous and require further clarification.</p> <p>Santos supports the provision of complete examples in the final guideline to ensure the expectations of the AER are clear.</p>
<p>12. Do you have any additional concerns and/or comments that you would like to make?</p>	<p>N/A</p>