

## Meeting Agenda

**Meeting Title:** Gas Advisory Board

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**Meeting Number:** 2020\_03\_12

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**Date:** Thursday 12 March 2020

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**Time:** 13:00 to 14:00

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**Location:** Training Room 2, Albert Facey House  
469 Wellington Street, Perth

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Item	Item	Responsibility	Duration
1	Welcome	Chair	2 min
2	Meeting Apologies/Attendance	Chair	3 min
3	Minutes of Meeting 2019_09_26	Chair	5 min
4	Actions Arising	Chair	5 min
5	Overview of Rule Change Proposals	Chair	5 min
6	Displaying Trucked LNG Volumes on the GBB	Chair	20 min
7	Recent Linepack Adequacy Events	AEMO	15 min
11	General Business	Chair	5 min

Next Meeting: 17 September 2020

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Please note this meeting will be recorded.

## Minutes

<b>Meeting Title:</b>	Gas Advisory Board ( <b>GAB</b> )
<b>Date:</b>	26 September 2019
<b>Time:</b>	1:00 PM – 2:35 PM
<b>Location:</b>	Training Room 2, Albert Facey House 469 Wellington Street, Perth

<b>Attendees</b>	<b>Class</b>	<b>Comment</b>
Stephen Eliot	Chair	
Matthew Martin	Small-Use Consumer Representative	Minister's Appointee
Martin Maticka	AEMO	
Steven Kane	Economic Regulation Authority ( <b>ERA</b> )	Observer
Alexandra Willis	Gas Producers	
Claire Quinn	Gas Producers	
John Jamieson	Pipeline Owners and Operators	
Rachael Smith	Pipeline Owners and Operators	
Hans Niklasson	Gas Users	
Richard Beverley	Gas Users	Proxy
Kathryn Sydney-Smith	Gas Shippers	
Allan McDougall	Gas Shippers	Proxy

<b>Apologies</b>	<b>Class</b>	<b>Comment</b>
Chris Campbell	Gas Users	Proxy attended
Michael Lauer	Gas Shippers	Proxy attended

<b>Also in attendance</b>	<b>From</b>	<b>Comment</b>
Richard Cheng	RCP Support	Presenter, Minutes
Sandra Ng Wing Lit	RCP Support	Presenter
Jake Flynn	ERA	Presenter

<b>Also in attendance</b>	<b>From</b>	<b>Comment</b>
Scott Davis	Australian Energy Council	Observer
Kate Ryan	EPWA	Observer

<b>Item</b>	<b>Subject</b>	<b>Action</b>
<b>1</b>	<p><b>Welcome</b></p> <p>The Chair opened the meeting at 1:00 PM and welcomed members and observers to the 26 September 2019 GAB meeting.</p>	
<b>2</b>	<p><b>Meeting Apologies/Attendance</b></p> <p>The Chair noted proxies and observers as listed above and all attendees made a verbal introduction.</p>	
<b>3</b>	<p><b>Review of Minutes from previous meeting</b></p> <p>The GAB accepted the tabled minutes of the GAB meeting on 27 September 2018 as a true and accurate record of the meeting.</p>	
<b>4</b>	<p><b>Actions Arising</b></p> <ul style="list-style-type: none"> <li>• Item 87 – AEMO indicated that they would present their draft forecasts for the 2019 Gas Statement of Opportunities (<b>GSOO</b>) at the next WA Gas Consultative Forum (<b>WAGCF</b>) in November 2019. The GAB agreed that members could attend the WAGCF and that a separate briefing session for the GAB was not required at this time. This item was closed.</li> <li>• Item 88 – Mr Matthew Martin provided an update that EPWA conducted a survey through APPEA and the DomGas Alliance and received three responses. EPWA took this as an indication of a lack of support for a gas trading market. Failing a stronger level of appetite, EPWA did not think it appropriate to progress this any further. Mr Hans Niklasson and Ms Claire Quinn were both supportive of EPWA’s decision and course of action for Item 88. This item was closed.</li> </ul>	
<b>5</b>	<p><b>Overview of Rule Change Proposals</b></p> <p>The Chair noted that there were no open Rule Change Proposals.</p>	
<b>6</b>	<p><b>Displaying Trucked LNG on the GBB</b></p> <p>The Chair provided a brief introduction covering the background and description of the issue of displaying trucked LNG on the Gas Bulletin Board (<b>GBB</b>).</p> <ul style="list-style-type: none"> <li>• Mr Martin emphasised that it was not a formal Government policy position that trucked LNG should be captured on the</li> </ul>	

GBB but rather a view that was expressed by EPWA regarding this issue.

- Mr Martin Maticka ran through AEMO's presentation on this issue (circulated as part of the GAB papers).
- Mr Niklasson asked whether the intent was to track where the trucked LNG was coming from which Mr Maticka confirmed.
- Mr Allan McDougall pointed out the large user threshold and that trucked LNG deliveries would not be captured if they are below that threshold, but that all volumes would be captured on the Production Facility side, which simplifies capturing this information on the GBB.
- Ms Alexandra Willis and Ms Quinn raised the point of commerciality and queried how onerous the obligations would be, depending on which option was chosen. It was further stated that the GBB requirements should encourage smaller businesses, not dissuade them.
- Ms Quinn asked why this issue was raised. Mr Maticka replied that this came out of last years' Energy in WA Conference and raised two questions: was AEMO breaching the GSI Rules by not capturing this information on the GBB; and if not, should the trucking information be captured on the GBB. The view was that AEMO was not in breach and so the second question is being investigated.
- Ms Quinn asked if this would apply to other fuel types. Mr Maticka replied that the GBB is only focused on gas.
- Mr John Jamieson asked if this trucked LNG information would be captured in the GSOO. Mr Maticka replied that it would be captured. Mr Jamieson queried whether the information would be of sufficient granularity.
- Ms Willis commented about the value this would provide for the market and that from an emergency management perspective, understanding the capacities out of Pluto would not impact the emergency management plan, and from a transparency view, it was only 15 TJ/day.
- Mr McDougall commented that the threshold is 10 TJ/day, Mr Jamieson clarified that this was 10 TJ/day of demand for one site.
- Mr McDougall stated that only Woodside was affected at this stage, but future developments could lead to material amounts not being captured if they also trucked LNG. Mr McDougall also acknowledged that if trucked gas would be captured if it came out of a pipeline rather than a Production Facility.
- Mr McDougall recognised that Woodside would count the gas provided via trucking towards their domestic gas obligations.

- Ms Quinn highlighted that it is important to capture where the gas is coming from over where the gas was going and asked what this information was intended to capture.
- Mr Niklasson stated that this issue was about transparency and how much gas had entered the WA market regardless of whether it was LNG or natural gas. The focus was not on the end users. Mr McDougall agreed.
- Mr Maticka discussed that trucked LNG could be displayed as another node on the GBB with a trucking graphic, and that it would likely be relatively straight forward.
- Ms Willis asked AEMO about the costs associated with implementing this change. Mr Maticka replied that detailed costs had not been sourced as the proposal was in a very preliminary stage, but he did not anticipate that this would be a significant cost.
- Mr Martin raised the issue of the prioritisation of this rule change should it be submitted and that this would be relatively low on the priority list. Mr Stephen Eliot replied that this would depend on where rule changes were in the priority queue and resource availability.
- Ms Willis and Ms Quinn asked about the rationale for capturing this information and what value this would bring to the market.
- Mr Maticka replied that Woodside's trucking of 15 TJ/day would be captured given the current threshold is 10 TJ/day.
- Mr McDougall added that some participants would see value and others would not, but capturing data through the GBB regime has led to a massive change in transparency of the market.
- Ms Quinn and Mr McDougall discussed information transparency and how it impacts the market.
- Mr Niklasson commented that the Department for Jobs, Tourism, Science and Innovation (**JTSI**) would capture this information for the domestic gas obligation data. He then asked how that information should be represented (e.g. via CSV file, displayed on the GBB, etc.) and that providing this data was unlikely to be cost prohibitive.
- Ms Rachael Smith commented that it was relatively easy to add this information as they had done so with their Tubridgi facility.
- Mr Eliot summarised the discussion that there appears to be some leakage of gas into the market via trucked LNG that is not being captured on the GBB. It could be captured in the GSOO but asked whether more granular data needs to be captured and if so, what are the associated costs.

<ul style="list-style-type: none"> <li>• Ms Willis stated that this data will be captured by the GSOO and that capturing it on the GBB could be revisited down the track if this information provision was insufficient. Mr McDougall responded that if the information was too costly then it should not be captured but if the cost was in the tens of thousands then it should go ahead.</li> <li>• Mr Richard Beverley stated that he was ‘on the fence’ and didn’t see huge value in providing the information but that there should be no concerns if it is simple to provide the data.</li> <li>• Mr Eliot summarised that Option 5 in AEMO’s presentation appears to have the most support because it is the simplest and lowest cost option.</li> <li>• Mr Maticka replied that a broad cost estimate could be sought and if there was a threshold for progression depending on the cost figure. Also, there would need to be a measurement of the benefits for the rule change process.</li> <li>• Mr Martin suggested that AEMO should estimate the costs and that the estimate should be circulated out of session. Mr Eliot suggested that Woodside should also estimate its costs to provide the data for the GBB and that RCP Support would circulate this information to the GAB for comment.</li> <li>• Mr Maticka stated that when participants replied about the costs, they should also provide comments as to the benefits of this rule change, which are currently identified as transparency, consistency of the framework and emergency management, but also to include any other factors so that AEMO can progress this issue to the next step.</li> <li>• Mr Martin commented that it would be important to also capture the cost and time of conducting the rule change process, including scoping, drafting, writing the proposal, etc.</li> </ul> <p><b>Actions:</b></p> <ul style="list-style-type: none"> <li>• <b>AEMO to provide a cost estimate for it to modify the GBB to receive and publish LNG trucking data.</b></li> <li>• <b>Woodside to provide a cost estimate for it to provide LNG trucking data to AEMO and/or RCP Support.</b></li> <li>• <b>RCP Support to circulate to the GAB the cost estimates for inserting LNG trucking data into the GBB and GAB members to provide RCP Support with their views of the costs and benefits of such an action.</b></li> </ul>	<p><b>AEMO (Oct 2019)</b></p> <p><b>Woodside (Oct 2019)</b></p> <p><b>RCP Support (Oct 2019)</b></p>
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7	<p><b>GSI Rules Compliance Monitoring and Investigation</b></p> <p>Mr Jake Flynn introduced the ERA's compliance team, summarised the area's approach to compliance in the context of the GSI Rules and proceeded to discuss his presentation (circulated in the GAB papers).</p> <p>In the discussion of the 'fail rates' for compliance identified in the presentation, Mr Flynn indicated that this did not indicate compliance breaches, but is an identifier for the ERA to determine whether further investigation is warranted.</p> <ul style="list-style-type: none"> <li>• Mr Jamieson raised a point that the information that Pipeline Operators give to AEMO was only as accurate as the information that they get from Shippers. Provided that the Pipeline Operators gave the information within the set timelines, then it is their view that they had complied with the GSI Rules.</li> <li>• Ms Smith highlighted that contracted nominations are in good faith and that Pipeline Operators had no control over the timing and accuracy of those nominations. Ms Smith also acknowledged that Pipeline Operators owned the process to provide that information to AEMO within the prescribed timelines.</li> <li>• Mr Flynn asked about the forecasts and if they are being revised as it got closer to real time. Ms Smith replied that this was dependent upon the Shipper putting in the information as their systems are automated.</li> <li>• Mr Jamieson highlighted that there is no requirement in the GSI Rules about accuracy of the information. Ms Smith commented that it was a forecast and that could vary compared to actual.</li> <li>• Mr McDougall also added, that in the case of Pipeline Operators, that the information contained in their system was someone else's information (i.e. the Shippers).</li> <li>• Mr Brearley commented that intraday, things can change significantly. Power stations and intermittent generation, particularly solar with cloud cover, can lead to dramatic variations on a given day.</li> <li>• Mr Jamieson and Ms Smith stated that the compliance on this area should focus on the process and whether that was being complied with.</li> <li>• Mr Flynn discussed that the submissions needed to be made in good faith and if this did not appear to be the case then this could indicate a breach.</li> <li>• Mr Jamieson asked who that breach would be against as they (Pipeline Operators) passed on the information provided by</li> </ul>	
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	<p>Shippers. The GSI Rules requires the Pipeline Operators to provide AEMO with the information that they had in their systems at the time. Ms Smith highlighted that weather could greatly affect the outcome relative to the forecast.</p> <ul style="list-style-type: none"> <li>• Mr Flynn clarified that the compliance view was to look at structural deficits of information.</li> <li>• Ms Willis highlighted that the GSI Rules require Pipeline Operators to submit nominations by certain times, but that holding Pipeline Operators accountable for forecast accuracy was unreasonable as they have no control over the information.</li> <li>• Mr Maticka commented that the purpose of this was so that information, such as the forecasts, have some rigour around them and although there would definitely be variations, if someone were to provide information that was a flat forecast that never shifted for power generation, this would seem to indicate this was not in good faith. This was so the forecasts information could be used elsewhere.</li> <li>• Mr Jamieson asked where this obligation was under the GSI Rules.</li> <li>• Ms Quinn also asked what the threshold would be and who assessed how 'compliant' the information would be and that parameters would need to be set. There is no industry standard.</li> <li>• Mr Maticka responded that there are two issues, one with quality of the information and the second around if the person providing the information has robust systems and practices in place to adequately provide that information.</li> <li>• Mr Jamieson noted that the issue here was flagging inaccuracy against Pipeline Operators who had no control over the information and that Pipeline Operators should not be held accountable for these issues.</li> <li>• Ms Smith asked about what threshold was considered a 'fail', and what was the tolerance rate. Mr Flynn replied that this was 10TJ above and below, or as a percentage from nameplate.</li> <li>• Mr Flynn stated that the high-level analysis of compliance issues had been completed and now a more detailed analysis is to be conducted by the ERA, which the ERA's compliance team may discuss with participants.</li> <li>• Ms Kate Ryan asked if there were repeat offenders who were responsible for the majority of the compliance breaches. Mr Flynn replied that there were certain parties who accounted for a significant amount of the breaches.</li> </ul>	
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	<ul style="list-style-type: none"> <li>Mr Steven Kane raised the issue of the 10-days for payment of invoices and the troubles that smaller participants had as they were on monthly pay cycles.</li> </ul>	
<b>8</b>	<p><b>Panel and RCP Support KPIs for 2018/19</b></p> <p>The GAB noted the paper on the Key Performance Indicators of the Rule Change Panel (<b>Panel</b>) and RCP Support. Mr Eliot summarised the findings and asked for the GAB's comments and feedback, particularly in response to the questions posed to GAB.</p> <ul style="list-style-type: none"> <li>Mr Niklasson asked about the stakeholder survey distribution. Mr Eliot replied that it was distributed widely with a very low response rate. Mr Maticka asked about the response rate for 2018/19. Mr Richard Cheng indicated that it was about an 8% response rate.</li> <li>Mr Maticka raised the issue about questions in the survey which seemed to be more directed at electricity to which Mr Eliot replied that this was the reason that 'N/A' was an option for survey answers.</li> <li>Mr Eliot asked a question about concerns around timeliness in the GAB and how meetings were conducted. Mr Niklasson raised a concern around the issue of timeliness for the LNG Trucking issue and how long this issue will be discussed. Mr Eliot replied that this would likely take a month to get responses from action items and circulate it for further discussion by the GAB.</li> <li>The Chair stated that he can be contacted about GAB issues at any time and can facilitate GAB discussions, including calling a GAB meeting between scheduled meetings.</li> </ul>	
<b>9</b>	<p><b>Review of the Framework for Rule Change Proposal Prioritisation and Scheduling</b></p> <p>The GAB noted the updated Framework for Rule Change Proposal Prioritisation and Scheduling (<b>Framework</b>), which the Market Advisory Committee (<b>MAC</b>), GAB and the Panel use to prioritise and schedule Rule Change Proposals (<b>Proposals</b>) for the Wholesale Electricity Market Rules (<b>Market Rules</b>) and GSI Rules accordingly. The following was discussed:</p> <ul style="list-style-type: none"> <li>The Chair indicated that the next step is to put this updated Framework out to comment to both electricity and gas participants and then provide this feedback to the Panel.</li> <li>Mr Eliot also discussed the single queue approach and that both GSI Rule Changes submitted over the past two years were progressed within the timeframes without significant delays.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Mr McDougall commented that due to the infrequent nature of GSI rule changes, having it rolled together in one queue appeared adequate.</li> <li>• Mr Eliot noted that if timeframes for rule changes were not met then they could be reprioritised which was a major point discussed at the previous GAB meeting in 2018.</li> <li>• Mr Martin raised the issue that it is possible that GSI rule changes may not go through unless they are very compelling, and since gas market fees are being paid, that an allocation of time may be appropriate.</li> <li>• Mr McDougall asked about why the rule changes that have been delayed were held up. Mr Eliot responded that Government reform programs have caused delays; and there has been resourcing issues for both RCP Support and parties that provide information and support to RCP Support.</li> <li>• On the fees issue, Mr Eliot stated that fees were based on actual services and time provided, so essentially 'no fee if there is no service'. Thus, gas participants were not charged for services which they did not receive.</li> <li>• Mr Niklasson stated that it is important to have a process so that important rule changes are processed before they become urgent.</li> </ul>	
<p><b>10</b></p>	<p><b>GAB Meeting Schedule for 2020</b></p> <p>The Chair presented the proposed GAB Meeting Schedule for 2020. The GAB accepted the new meeting dates with the next meeting scheduled for 12 March 2020.</p>	
<p><b>11</b></p>	<p><b>General Business</b></p> <ul style="list-style-type: none"> <li>• Ms Smith raised that Pipeline Operators lack visibility of gas-fired power station dispatch from AEMO. The current process is that Pipeline Operators' control rooms must telephone AEMO's control room to seek information as there is no provision for a Pipeline Operator's control room to get a report covering dispatch of gas generation. This would mean a rule change, most likely processed on the MAC side, so that an automated process could be implemented to better address this operational issue.</li> <li>• Several GAB members raised that the currently stumbling block is likely around confidentiality of information.</li> <li>• Ms Smith commented that not having access to a dispatch of gas-fired generation report was not previously an issue, but the rise of intermittent generators has made it an issue. DBNGP is considering a Rule Change Proposal and has</li> </ul>	

	<p>received information from AEMO; with internal discussions under way on this proposal.</p> <ul style="list-style-type: none"><li>• Mr Eliot offered RCP Support services to assist in the rule change process.</li></ul>	
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**The meeting was closed at 2:35 PM.**

## Agenda Item 4: GAB Action Items

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Shaded	Shaded action items are actions that have been completed since the last GAB meeting.
Unshaded	Unshaded action items are still being progressed.
Missing	Action items missing in sequence have been completed from previous meetings and subsequently removed from log.

Item	Action	Responsibility	Meeting Arising	Status/Progress
90	AEMO to provide a cost estimate for it to modify the GBB to receive and publish LNG trucking data.	AEMO	October 2019	<b>Closed</b> AEMO provided a response on Action 90 on 12 November 2019 – see Agenda Item 6.
91	Woodside to provide a cost estimate for it to provide LNG trucking data to AEMO and/or RCP Support.	Woodside	October 2019	<b>Closed</b> Woodside provided a response on Action 91 on 31 January 2020 – see Agenda Item 6.
92	RCP Support to circulate to the GAB the cost estimates for inserting LNG trucking data into the GBB and GAB members to provide RCP Support with their views of the costs and benefits of such an action.	RCP Support GAB	October 2019	<b>Closed</b> RCP Support has circulated the responses on Actions 90 and 91. The issue of displaying trucked LNG volumes on the GBB is to be discussed under Agenda Item 6.

## Agenda Item 5: Overview of Rule Change Proposals (as at 5 March 2020)

Meeting 2020\_03\_12

- Changes to the report provided at the previous GAB meeting are shown in **red font**.
- The next steps and the timing for the next steps are provided for Rule Change Proposals that are currently being actively progressed by the Rule Change Panel.

### Rule Change Proposals Commenced since the last GAB Meeting

Reference	Submitted	Proponent	Title	Commenced
None				

### Approved Rule Change Proposals Awaiting Commencement

Reference	Submitted	Proponent	Title	Commencement
None				

### Rule Change Proposals Rejected since the last GAB Meeting

Reference	Submitted	Proponent	Title	Rejected
None				

### Rule Change Proposals Awaiting Approval by the Minister

Reference	Submitted	Proponent	Title	Approval Due Date
None				

## Formally Submitted Rule Change Proposals

Reference	Submitted	Proponent	Title	Urgency	Next Step	Date
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### Fast Track Rule Change Proposals with Consultation Period Closed

None						
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### Fast Track Rule Change Proposals with Consultation Period Open

None						
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### Standard Rule Change Proposals with Second Submission Period Closed

None						
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### Standard Rule Change Proposals with Second Submission Period Open

None						
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### Standard Rule Change Proposals with First Submission Period Closed

None						
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### Standard Rule Change Proposals with the First Submission Period Open

None						
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## Pre-Rule Change Proposals

Reference	Proponent	Description	Next Step	Submitted
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None				
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## Agenda Item 6: Displaying Trucked LNG Volumes on the GBB

Meeting 2020\_03\_12

### Background

The Gas Advisory Board (**GAB**) discussed the issue of displaying trucked LNG volumes on the Gas Bulletin Board (**GBB**) at its meeting on 26 September 2019. Full minutes from this discussion are available (see Agenda Item 3) and a summary of the discussion is as follows:

- The issue arose after Woodside announced in late 2018 that it was trucking LNG to customers from its Pluto production facilities and it was recognised that this gas would not be tracked on the GBB because it does not enter the gas pipeline network.
- The question was asked whether trucked LNG volumes should be tracked on the GBB and it was noted that:
  - Sub-rule 89(1)(c) of the GSI Rules requires AEMO to publish on the GBB any 'other consumption that is neither GBB Large User Facility consumption or distribution network connected consumption', which would include trucked LNG volumes; and
  - Energy Policy WA (**EPWA**) indicated its view that the GBB should capture trucked LNG volumes if the costs of providing the information are not too significant relative to the benefits and noted that the WA Government has not formed a policy position on this matter.
- The thresholds for capturing gas volume data on the GBB are 10 TJ/day<sup>1</sup> and the trucked LNG volumes were about 15 TJ/day as of September 2019, so these volumes would be captured and reported on the GBB if it is determined that the GBB should report these volumes.
- AEMO gave a presentation on the options for displaying trucked LNG volumes on the GBB (see Agenda Item 6 from the GAB meeting on 26 September 2019), where it listed the following options:
  - (1) virtual pipeline;
  - (2) require end-users to register as GBB Large User Facilities;
  - (3) expand the definition of Registered Shippers;
  - (4) introduce a new framework for Truck Load-Out Facilities; or
  - (5) expand reporting by Production Facility Operators.

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<sup>1</sup> The Exemption Criteria specified in the GSI Rules are:

- for a Transmission Pipeline, if the Nameplate Capacity of the pipeline is <10TJ/day; [sub-rule 44(2)(a)];
- for a Storage Facility, if the Production Nameplate Capacity of the facility is <10TJ/day; [sub-rule 45(2)(a)];
- for a Production Facility, if the Nameplate Capacity of the facility is <10TJ/day; [sub-rule 46(2)(a)]; and
- for a Large User Facility, if the facility has not been delivered ≥10 TJ/day on a single Gas Day in the last 12-month period or the applicant can demonstrate that the facility will not be delivered ≥10 TJ/day during the coming 12-month period.

- Option (5) had the most support from GAB members because it appears to be the simplest and lowest cost option, although this was not a unanimous view.
- The Gas Statement of Opportunities will capture information on trucked LNG volumes, so the question is whether there is value in providing more granular and regular data on the GBB.
- The GAB recognised that the value from providing more granular and regular data on trucked LNG volumes on the GBB would come from transparency of the volumes for users, consistency of the framework and emergency management.
- The GAB asked AEMO and Woodside to provide information on their likely costs to provide and report on the trucked LNG volume data.

## Actions from the 26 September 2019 GAB Meeting

### Action 90 – AEMO

Action: AEMO to provide a cost estimate for it to modify the GBB to receive and publish LNG trucking data.

Response: In relation to the implementation cost to change the GBB to enable Trucked LNG to be captured, we believe a very broad estimate of \$65,000 would cover the required changes. Please note this is highly dependent on the final rule drafting so may vary significantly if any drafting becomes complex.

### Action 91 – Woodside

Action: Woodside to provide a cost estimate for it to provide LNG trucking data to AEMO and/or RCP Support.

Response: We acknowledge the GAB's request for Woodside to confirm the estimated costs involved in providing trucked LNG data for publication on the GBB. However, it is difficult for Woodside to provide a meaningful estimate of these costs due to the way deliveries from the trucking facility are measured, for these same reasons, it is not practical for Woodside to provide daily data.

Woodside's trucked LNG business does not operate on a single computer platform that can provide daily data to automatically upload to the GBB. Rather, there are a combination of multiple systems across the Pluto plant, customer sites, transporter and back-office, which are used to nominate and measure what loads are to be picked for a day, and in what quantities. These are not integrated systems and there is no requirement for them to be merged in the near future, nor is it commercial or practical to do so. Invoice, billing and reconciliation is planned to be undertaken on a monthly basis. Furthermore, the measurements are not on an 8am – 8am pipeline 'gas day'.

From a logistics perspective, the trucked LNG business is not required or designed to be a 'daily' operation, akin to traditional pipeline gas deliveries. Daily data is not steady and/or applicable to the operation of the facility. Customers have on-site storage and the operation is managed more from a storage balance issue, as opposed to daily draw down. While there may be a connection between the daily data and gas deliveries, the potential logistics issues associated with loading, trucking, road conditions and weather impacts, for example, mean that any daily impact is not an accurate or meaningful measure of future deliveries.



In addition to the above, it is worth noting that:

- A. From a demand perspective, trucked LNG focuses on non-connected customers – e.g. remote power sites. Currently, the customers Woodside engages with are not connected to either the electricity or gas grids, and their consumption does not impact another customer's energy loads/demands in any way.
- B. From a supply perspective, the LNG comes directly off the Pluto production line (and or storage tanks) and has no impact on the domestic gas facilities, whether they be the gas pipelines and/or compressor stations. In other words, there is no connection to the daily trucked LNG and that of Pluto's ability to supply domestic pipeline gas.

Accordingly, given the nature of trucked LNG operations and our typical customer base, it is Woodside's view that not only is providing daily trucked LNG data impractical, but that the publication of any daily data currently available on the GBB would have limited benefits to the market for the reasons outlined above.

## Discussion

The GAB is asked to:

(1) Consider:

- (a) the potential benefits from publishing trucked LNG volumes on the GBB; and
- (b) the responses from AEMO and Woodside on the costs for publishing trucked LNG volumes on the GBB.

(2) Discuss:

- (a) whether there is sufficient value in publishing trucked LNG volumes on the GBB to justify the development of a Rule Change Proposal to support this arrangement; and
- (b) if so, who should develop the Rule Change Proposal and what priority should be given to developing and progressing the proposal?



# GBB Recent Linepack Capacity Adequacy Events

March 2020

# Obligations

## Medium-Term Capacity (MTC)

- Pipeline Operators, Storage Facilities, and Production Facilities are required to submit.
- Outlines planned maintenance that will have a material impact on capacity during the next **12 months**.

## Capacity Outlook

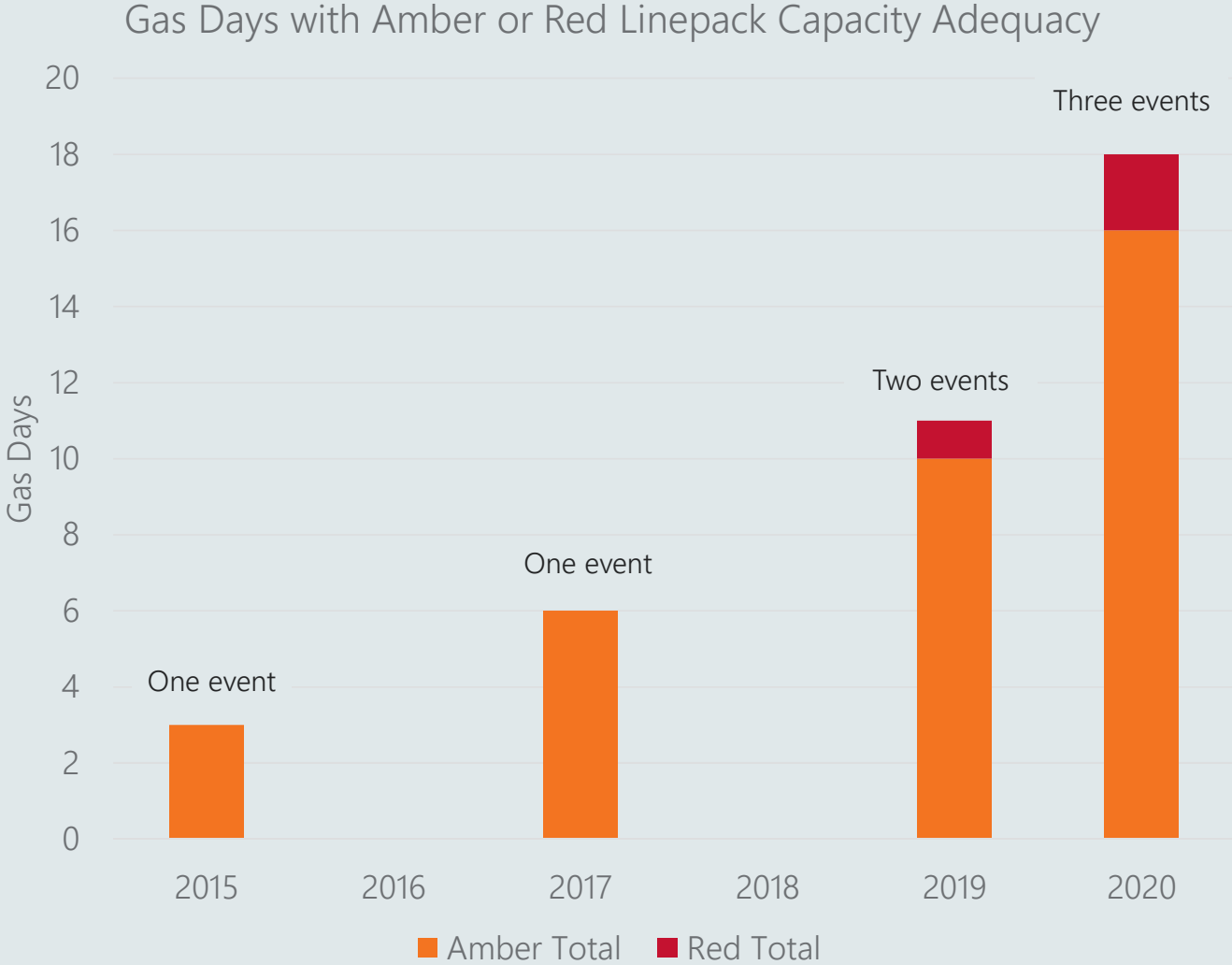
- Pipeline Operators, Storage Facilities, and Production Facilities are required to submit for the next **7 days**.
- Should only differ from Nameplate Capacity if on planned maintenance (MTC) or an issue occurs.
- **Pipeline** – Quantity of gas that can be transported through the Pipeline.
- **Facility** - Quantity of gas that can be injected into the Pipeline.

## Linepack Capacity Adequacy (LCA)

- Pipeline Operators submit for the next **3 days**.
- Indicates the actual capability of the Pipeline to meet the relevant delivery nominations.

**Green:** normal operation  
**Amber:** likely curtailment of interruptible flows  
**Red:** likely curtailment of firm flows.

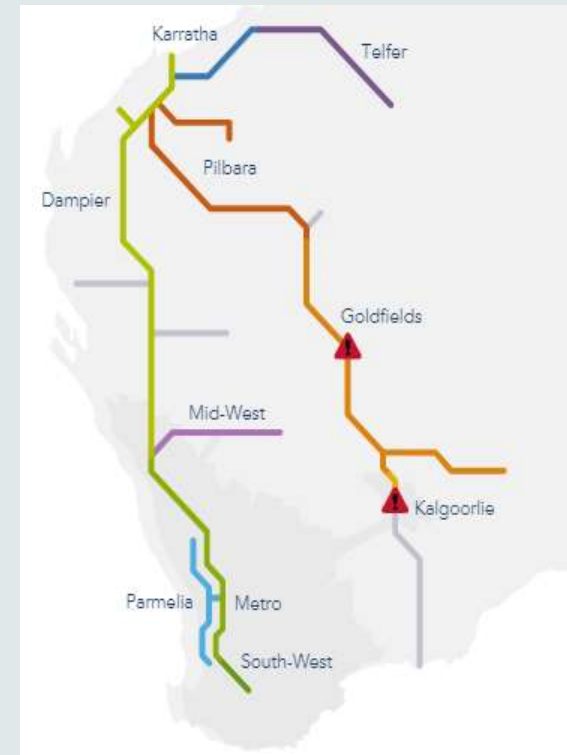
# Amber and Red LCA



# Red LCA Event

## 16-18 January 2020

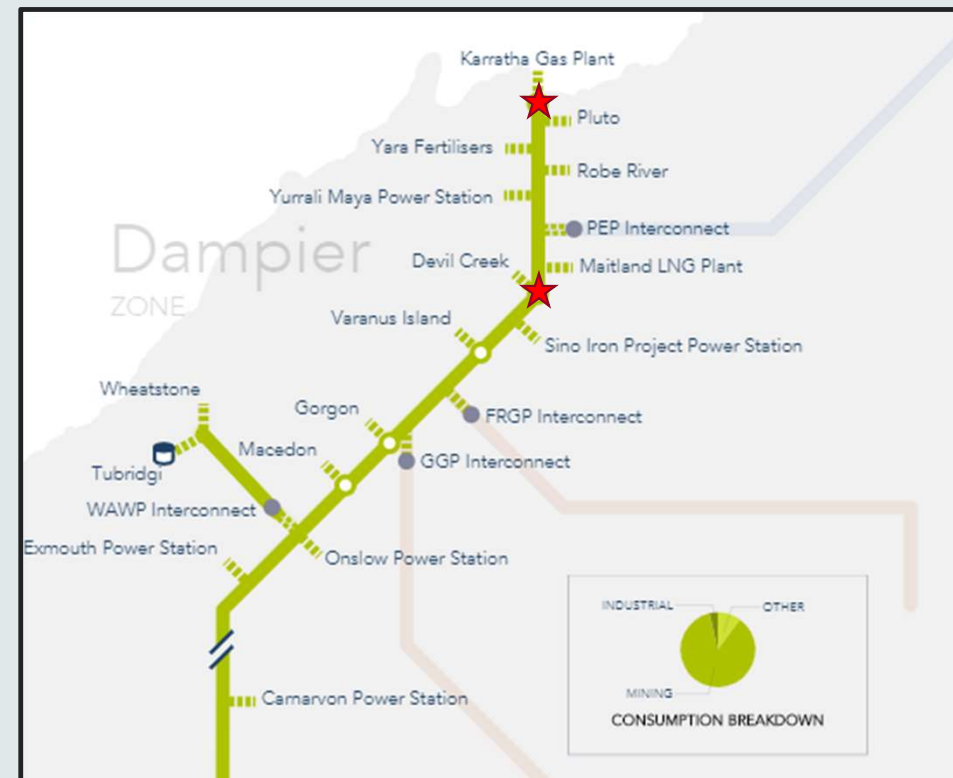
- The LCA for the Goldfields zone and the Kalgoorlie zone was updated by APA to **Amber** status on the 16/01 and 17/01, respectively.
- This issue was the result of a compressor trip on the Goldfields Gas Pipeline due to flooding in the area.
- The LCA status of the Goldfields and Kalgoorlie zones was updated to **Red** for Gas Days 18/01 and 19/01.
  - Regular updates were provided to AEMO by APA.
  - Gas delivery was curtailed from 202.5 TJ/day to 176 TJ/day for 18/01 and 19/01.
  - Energy Policy WA was advised of the situation.
  - Parkeston Power Station (located in the Kalgoorlie zone) bid higher prices (therefore not dispatched in the WEM) until 19/01.
- EMF was not activated.



# Amber LCA Event

## 8-13 February 2020

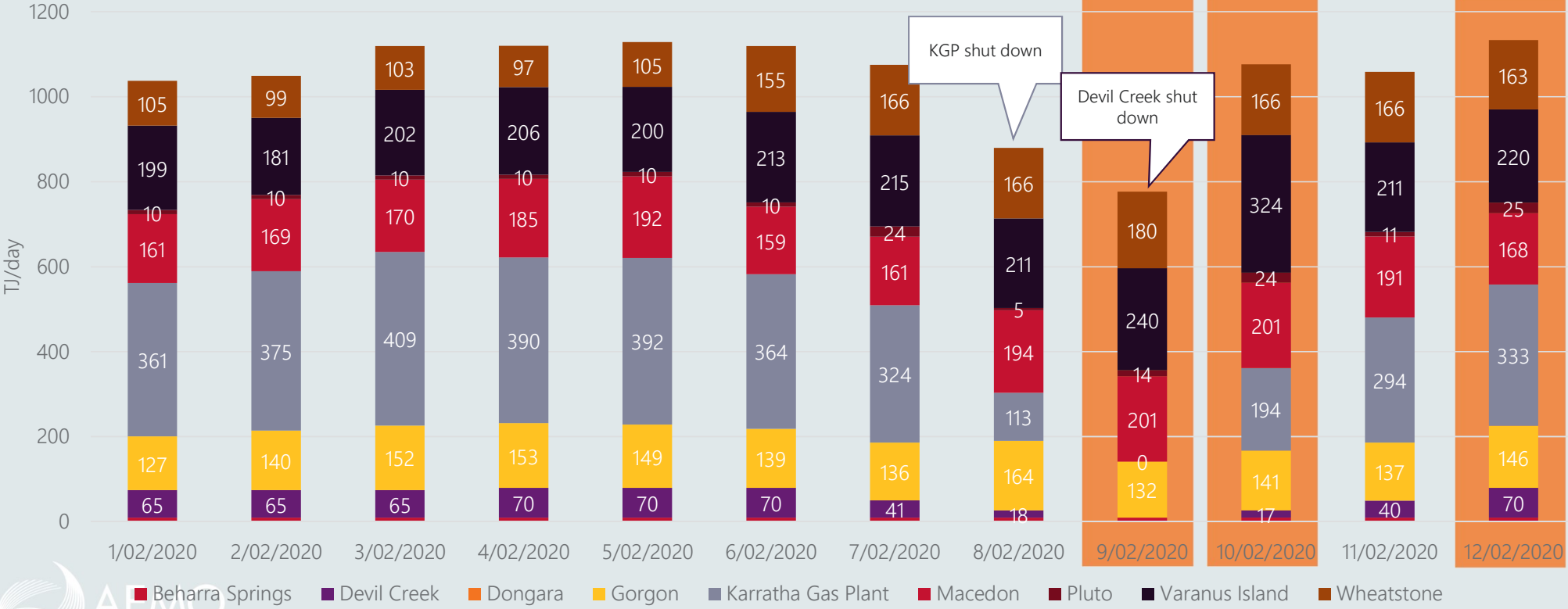
- On 09/02, Tropical Cyclone Damien made landfall at Karratha.
- Karratha Gas Plant (KGP) shut down on 08/02, and Devil Creek on 09/02.
- **Amber** LCA was submitted on the DBNGP for 09/02 and 10/02.
- KGP changed its Capacity Outlook to 0 TJ for 10/02, reverting to 630 TJ/day (Full Nameplate) for 11/02.
- Devil Creek changed its Capacity Outlook to 0 TJ for 10/02, and 10 TJ/day (Half Nameplate) for 11/02.
- LCA was reverted back to **Green** on 11/02, and once more to **Amber** for 12/02 and 13/02. No change in Capacity Outlook from Production Facilities in response.



# Amber LCA Event

## 8-13 February 2020

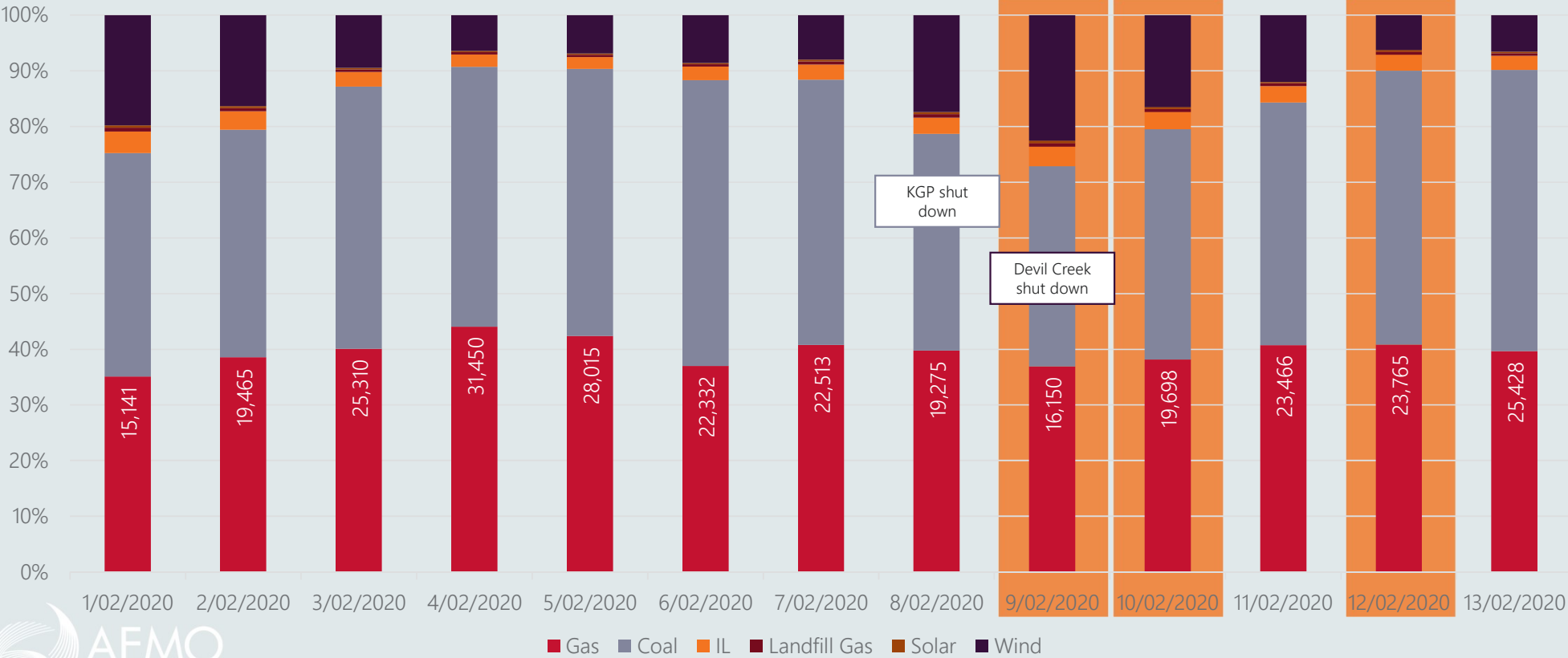
Production Facility Actual Flows



# Amber LCA Event

## 8-13 February 2020

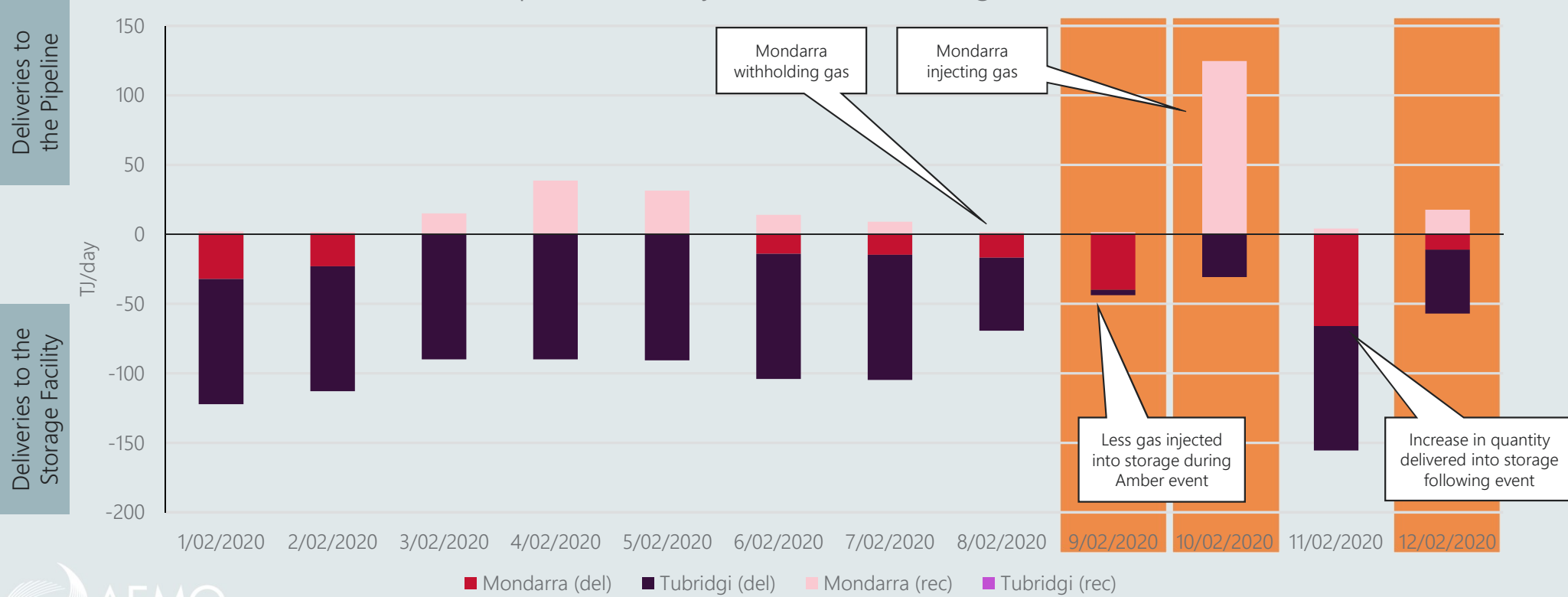
Percentage of Energy Fuelled by Gas in SWIS (MWh)





# Storage Facility Behaviour

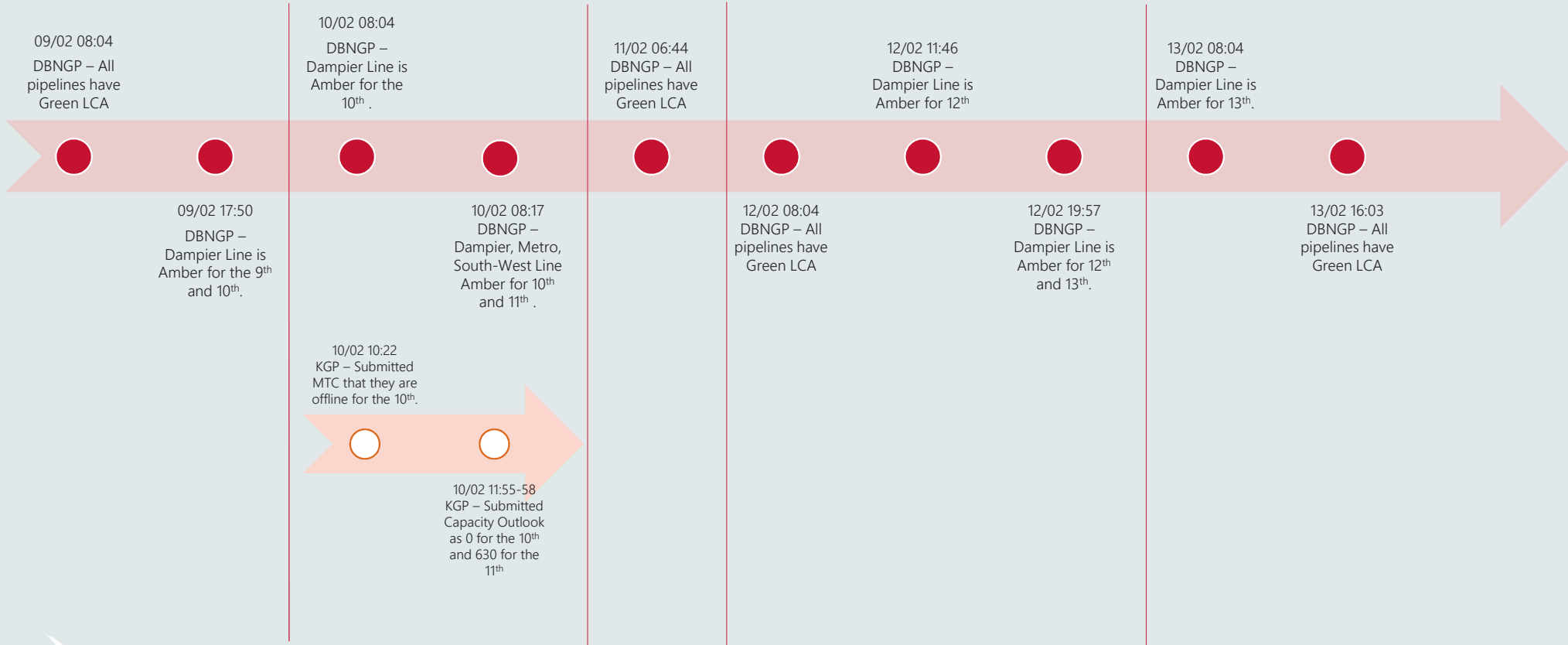
### Receipt and Delivery of Flows from Storage Facilities



# Discussion Points

- What role would the EMF have played if it was activated? Would it have provided the stakeholders with useful information?
- Are the obligations for Production Facilities (MCA and Capacity Outlook) sufficient?
- Are the obligations for Pipeline Operators (LCA and Nominations) sufficient?
- Is any additional information required by stakeholders in these incidents?

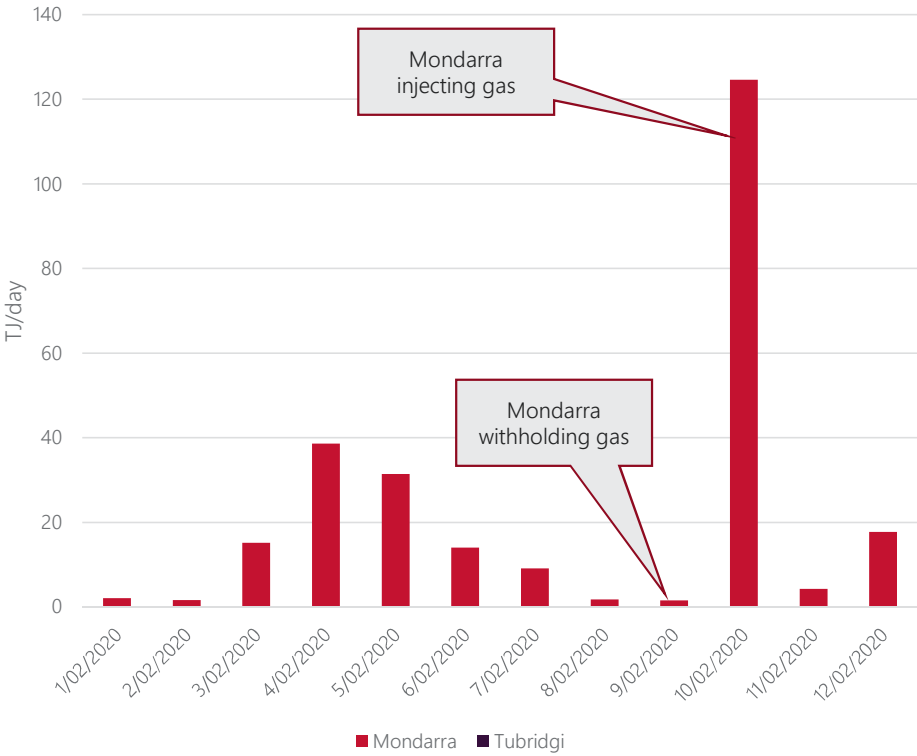
# Submissions Timeline



\*Submissions by DDG for WAWP and Tubridgi Storage Facility were always Green

# Storage Facility Behaviour

Received from Storage



Delivered into Storage

