

2 April 2014

Mr John Pierce  
Chairman  
Australian Energy Market Commission  
Submitted through AEMC Website  
Reference: GRC0024

Dear Mr Pierce

### **Rule change consultation - National Gas Bulletin Board Capacity Outlooks**

Stanwell Corporation Limited (Stanwell) welcomes the opportunity to respond to the National Gas Bulletin Board (Bulletin Board) Capacity Outlook rule change proposed by AEMO.

Stanwell is the largest electricity generator in Queensland with an electricity generating capacity of more than 4200MW, enough capacity to supply around 45 per cent of Queensland's average electricity needs. Stanwell owns coal, gas and hydro generation at seven geographically dispersed sites.

Stanwell's interest in the gas market is as an industrial buyer and trader of gas for the gas-fired Swanbank E and Mica Creek power stations. Swanbank E power station has a capacity of 385MW and is located 10km from Ipswich, QLD. Mica Creek power station is 302MW and is located near Mount Isa, QLD. Stanwell is a participant in the Brisbane STTM and the Wallumbilla hub and uses the Bulletin Board to assist in managing gas positions.

Stanwell supports the proposed rule change as it improves the transparency and availability of market information at low cost. We also support the consideration of this rule change on an expedited timeframe.

Stanwell also notes the Standing Council on Energy and Resources' (SCER) request to AEMO to redevelop the Bulletin Board. Stanwell supports this redevelopment work and will participate in AEMO's industry reference group on this project.

Selected questions from the consultation are answered below:

*Q1 a) What level of information do gas market participants require to effectively carry out their operations?*

Stanwell uses the Bulletin Board to assist in managing gas positions. The data provided is helpful however there are inconsistencies in the amount of data provided in different parts of the network. Ideally the Bulletin Board should be able to inform participants of gas flows in any part of the network. The Bulletin Board does not presently provide this information.

In order to increase market transparency, Stanwell suggests that AEMO play a more active role in collecting and publishing gas market data similar to AEMO's SCADA collection abilities in the electricity market.

In particular, Stanwell requires the following information:

1. Forecast pipeline and producer capacity information. This is analogous to data provided by AEMO in the National Electricity Market (NEM) through the Short Term (ST) Projected Assessment of System Adequacy (PASA) and Medium Term (MT) PASA publications.
2. Actual pipeline and producer capacity information. This is analogous to the information contained in NEM SCADA feeds.
3. Clear topological representations of the existing Eastern Gas infrastructure and associated constraints. This topological representation should include every facility or plant connected to the Bulletin Board. The topological representation should be consistent with the existing map of the Victorian gas transmission network published by AEMO at this location:  
<http://www.aemo.com.au/Maps-and-Multimedia>

*Q1 b) Does this data and information need to be published in a standardised format (for example, in a spreadsheet) for ease of interpretation?*

Standardised formats are a central requirement of data provision to enable participant use. Non-standardised information delivery greatly increases the chance of omission or misinterpretation. For maximum efficiency, a consistent data publishing methodology could be adopted across both electricity and gas markets.

AEMO must also consider the best data publishing methodologies for both small and large participants. Small participants may require excel or CSV formats whereas large participants such as Stanwell require integration with the existing INFOSERVER framework. As much as possible, all electricity and gas related data managed by AEMO should be contained in INFOSERVER.

*Q1 c) Does this data and information need to be provided at regular intervals to be of use?*

Regular, or at least consistent and predictable, delivery is a central requirement of data provision to enable participant use. Ad-hoc or unexpected information delivery greatly increases the chance of omission or misinterpretation. As a minimum, Stanwell expects daily updates to the Bulletin Board.

*Q2 c) Are there other expected activities/tasks and costs associated with this rule change that have not been identified? If yes, please provide an indication of the magnitude of these costs.*

Stanwell are not aware of any considerations that have not been addressed in the rule consultation paper.

*Q3 a) Are there any confidentiality issues for participants or customers surrounding the publication of short-term or medium-term capacity outlook information?*

Stanwell is not aware of any confidentiality issues. The provision of this data is consistent with the obligations to provide similar data in the NEM.

*Q4 a) Do stakeholders agree with AEMO that the rule change is a low-cost way to improve information provision? If no, are there any alternative ways of achieving the same policy objectives?*

Stanwell agree with AEMO that the proposed rule change is a low cost way to improve information provisions.

Stanwell welcomes the opportunity to discuss further these views on the proposed rule change. Stanwell's representative on this matter is Jennifer Tarr ([Jennifer.Tarr@stanwell.com](mailto:Jennifer.Tarr@stanwell.com) or 07 3228 4546).

Yours sincerely

A handwritten signature in cursive script that reads "T. Mills".

Tanya Mills  
Acting Executive General Manager  
Energy Trading and Commercial Strategy