



Australian Energy Market Commission  
PO Box A2603  
Sydney NSW 2001

Jemena Limited  
ABN 95 052 167 405

19 November 2020

Lodged on line at: [www.aemc.gov.au](http://www.aemc.gov.au)

Level 16, 567 Collins Street  
Melbourne, VIC 3000  
PO Box 16182  
Melbourne, VIC 3000  
T +61 3 9173 7000  
F +61 3 9173 7516  
[www.jemena.com.au](http://www.jemena.com.au)

Dear Sir/Madam,

**RE: PROJECT REFERENCE CODE GRC0058 - DWGM MAINTENANCE PLANNING**

Jemena appreciates the opportunity to comment on the Consultation Paper for the National Gas Amendment (DWGM Maintenance Planning) Rule 2020 proposed by the Australian Energy Market Operator (**AEMO**) dated 22 October 2020 (**Paper**) regarding the Victorian declared wholesale gas market (**DWGM**).

Jemena understands that in respect of the DWGM:

- the amendments seek to address:
  - the inconsistent system security standard required for maintenance operations;
  - the creation of extra maintenance directions that must be issued by AEMO to 'Producers'; and
  - differences between the definitions of 'Producer' and 'Storage Provider' in the National Gas Rules and the National Gas Law; and
- the Australian Energy Market Commission proposes to expedite this rule change on the basis that the rule is non-controversial.

**Definition of DWGM facility operator**

In principle, Jemena agrees that a clear and consistent approach is desirable.

Jemena is concerned that a possible unintended consequence of the drafting of the proposed rule change, specifically the proposed definition of "DWGM facility operator" as it applies to transmission pipelines in certain rules, potentially extends what are currently the obligations of "interconnected transmission pipeline service providers" to "service providers" (being a wider term). The drafting of the rule change should make it clear that it only applies to an "interconnected transmission pipeline service provider" (being a service provider for a transmission pipeline that is connected to the declared transmission system) under Part 19 (see rules 324(4) and 326(1)).

**General**

Jemena recognises the importance of these maintenance planning rules but stresses that safety and asset integrity must take precedence in any consideration or instruction by AEMO and would welcome a clear statement to that effect in the rules.

Please contact me by email at [jan.peric@jemena.com.au](mailto:jan.peric@jemena.com.au) or by phone on (03) 9173 7966 if you would like to discuss any matters raised in this letter.

Yours sincerely

**Jan Peric**  
**General Manager Regulatory Affairs – Gas Markets**  
Jemena