

Gas Services Information Rule Change Proposal Submission

GRC_2018_01: GBB Zones

Submitted by

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Submissions on Rule Change Proposals can be sent by:

Email to: rcp.secretariat@rcpwa.com.au

Post to: Rule Change Panel
Attn: Executive Officer
C/o Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

1. Please provide your views on the proposal, including any objections or suggested revisions.

Alinta Energy (**Alinta**) welcomes the opportunity to provide a submission to the Rule Change Panel on the *Rule Change Proposal: GBB Zones (GRC_2018_01) (Proposal)*.

Alinta is broadly supportive of the Proposal which seeks to:

- remove the Zones from the GSI Rules and instead specify the Zones in the GSI Procedure: GBB Registration, Deregistration, Exemptions and Transfer (**Registration Procedure**); and
- develop guidelines for the allocation of a GBB Pipeline to a Zone and the revision of Zones to accommodate future gas market developments, and include those guidelines in the Registration Procedure.

In general, the Proposal is broadly in line with Alinta's previous views on how the GSI rules should deal with the GBB Zones. In particular:

- Alinta considers that the Proposal provides a common-sense solution to dealing with the administrative issues in defining and managing the GBB Zones and changes in these Zones (rather than having to administer the Rule Change Process every time a change is required); and

- Alinta supports the inclusion of these requirements in the Registration Procedure as the governance of this process affords participants with the opportunity to express any views and concerns i.e. AEMO can't unilaterally make amendments to the Zones without stakeholder consultation.

Specific changes to the GSI Rules

In noting this support, Alinta suggests the following additional amendments to the proposed drafting (in red):

82 Zones

(1) AEMO must develop and maintain a Procedure that specifies:

- (a) the Zones, including the specified GBB Pipelines (or parts of pipelines) and all Receipt Points and Delivery Points connected to those pipelines (or parts of pipelines), for which information is published on the GBB;
- (b) ~~guidelines~~ the process for the allocation of new pipelines to the Zones; and
- (c) ~~guidelines~~ the process for the revision of the Zones.

Alinta considers that guidelines are general statements which are broadly designed to achieve a policy objective. Whereas procedures are used to describe a process and should outline who does what, when they do it and under what criteria.

The reason for Alinta's proposed amendment to the drafting is to make it clear that the Registration Procedure should step out the process AEMO needs to follow, and not just outline some high-level guidelines which AEMO just needs to take into account when allocating pipelines to zones and/or revising zones (which is what the proposed drafting infers).

Alinta has not reviewed AEMO's procedure change drafting in detail and will provide any comments on the proposed procedure to AEMO directly.