



22 August 2018

Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

**Attention: Shari Boyd**

Dear Ms Boyd,

**Reference: GRC0040 Improvements to Natural Gas Bulletin Board**

APA Group welcomes the opportunity to comment on the draft rule determination published 11 July 2017. APA broadly supports the proposed changes to clarify the purpose and improve the usability of the Natural Gas Bulletin Board.

APA offer the following comments in regards to specific sections of the proposed rule:

- Rules 182(3), 183(7) & 185(4) – Whilst APA agrees with the intent of this clause to provide the most up to date information possible, the practical system implementation of this requirement presents some operational issues and may be better addressed by adopting a time dependant approach to the publication of changes, as in the WA Gas Services Information Rules, whereby changes to data are published at set times (9am & 1 pm on the day).
- Duplication of reporting of forecast and actual flow data: Consideration should be given to providing a reporting exemption mechanism for situations where the same data is potentially required to be supplied by two parties. An example of this could be a production facility that is connected to a pipeline and a single point and would potentially require both the producer and the pipeline operator to provide the same forecast and actual flow data to the Bulletin Board operator. AEMO already operate such an exemption process for the WA Bulletin Board.
- Timing: The proposed start date for these changes of 30 Sept 2018 should provide adequate time for parties to make the appropriate system and process changes, however it should be noted that there are broader and more significant changes potentially required to comply with GMRG reforms, that are also planned for implementation at this time, so a later date may be more appropriate.

APA would be pleased to discuss this submission and to provide further information which may assist the AEMC. APA's first point of contact is John Jamieson on 07 3323 6023.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Bolding', written over a white background.

Peter Bolding  
General Manager Strategy & Regulatory