

# Santos – Gas Day Harmonisation Transition Plan

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## 1. Scope

As per Part 26, schedule 5, part 6, rule 4 of the *National Gas Rules* (NGR), this document defines the approach Santos will take to ensure the business will be compliant with the NGR requirements for Gas Day Harmonisation (GDH) such that all gas day start times align within the East Coast Gas Markets to 6:00am AEST from 1st October 2019.

This submission covers the operation of the following relevant Santos companies:

- Santos TOGA Pty Ltd
- Santos CSG Pty Ltd
- Santos Ltd
- Alliance Petroleum Australia Pty Ltd
- Basin Oil Pty Ltd
- Bridge Oil Developments Pty. Limited
- Bridgefield Pty Ltd
- Moonie Pipeline Company
- Outback Energy Hunter Pty Ltd
- Reef Oil Pty. Ltd.
- Santos (BOL) Pty Ltd
- Santos (NARNL Cooper) Pty :td
- Santos Australian Hydrocarbons Pty Ltd
- Santos Direct Pty Ltd
- Santos Petroleum Pty Ltd
- Santos QNT Pty Ltd
- Santos Resources Pty Ltd
- Vamgas Pty Ltd

## 2. Alignment with AEMO General Principles

Santos companies will operate in a way that is consistent with the AEMO guiding principles Section 1.6, particularly:

- Item 3 – Transitional gas day 30 Sep 2019 will be shorter than usual:
  - a) SA 23.5 hours,
  - b) Qld 22 hours
- Item 4 – All interval metering data from data provider to regulated markets and users will reflect consumption over the relevant gas day ie:
  - a) Current gas day up to and including 29 September 2019
  - b) Shorter gas day on 30 September 2019
  - c) Standard gas day from 1 October 2019
- Item 5 – All metering changes need to be in place by 1 October 2019, where they are related to reporting to gas markets, other third-party interfaces or a primary source of external reporting.

## 3. External Interfaces

Santos has identified the key external interfaces with third-parties, for example covering metering and allocation arrangements. Santos will engage with third parties to confirm the common approach as defined in this procedure and consistent with the AEMO guiding principles. Santos has a plan that ensures all the necessary engagement/alignment will be complete by the required target date for compliance to the AEMO guidelines.

## **4. MDQ Short Gas Day Impacts**

No change to MDQ will be imposed by Santos on short gas day on 30 September 2019.

## **5. Short Gas Day Nomination Methodology**

Santos will operate in a way that is consistent with the AEMO guiding principles such that its nominations and its expectation of nominations from other parties for the short gas day on 30 September 2019 will take into account the short gas day duration in the relevant jurisdiction. Santos will engage with the relevant third parties to confirm this approach.

## **6. Meter Reconfigurations**

Santos has a range of assets across Queensland, New South Wales and South Australia which report to gas markets, other third-party interfaces or a primary source of external reporting. Santos will update these assets to the GDH standard gas day from 1 October 2019.

As per Part 26, rule 678 clause 8 of the NGR, the meter configurations for these meters will be updated, such that measurement and recording of quantities of natural gas will align for each period corresponding to the GDH standard gas day from 1 October 2019.

## **7. Internal transition scope & reporting**

Santos has identified the key internal changes that will need to occur spanning physical equipment, metering, nominations, IS system changes and contracts. Santos is working to complete all mandatory activities ready for the short gas day on 30 September 2019 and the commencement of GDH on 1 October.

Santos will continue to report to AEMO through the AEMO GDH surveys on progress of matters of material consequence. Where matters are of low materiality or there are no issues with meeting the required changes by the critical dates then Santos will not be providing detailed updates.

For the purpose of Gas Day Harmonisation, Santos has nominated the following Santos key contacts:

- a. Regulatory Manager 07 3838 3009
- b. Team Leader Production Allocation 08 8116 7091
- c. Commercial Operations & Short-Term Trading Manager – Marketing & Trading 08 8116 7073

## **8. Contingency planning**

Santos will ensure as part of contingency planning, additional validation occurs to ensure continued accuracy. Should an error occur Santos will utilise production allocation estimates as an interim solution.

Should any issues arise at the interfaces, Santos will actively communicate those issues with the relevant third party to provide transparency in relation to any potential issues.