

25 June 2019

Mr Sebastian Roberts
General Manager, Transmission and Gas
Australian Energy Regulator
GPO Box 520, Melbourne VIC 3001

By email: sebastian.roberts@acc.gov.au

Dear Mr Roberts

Evoenergy – amendment to access arrangement to reflect gas day harmonisation

Evoenergy submits this application to the Australian Energy Regulator (AER) under clause 65(1) of the National Gas Rules (NGR) for approval to vary the 2016-2021 access arrangement for Evoenergy's gas network in order to reflect the recent change to the NGR relating to gas day harmonisation.

The proposed variation is to amend the Reference Service Agreement (RSA) which forms Schedule 5 to the access arrangement to include a new clause 1.7. Evoenergy considers that the variation is non-material and therefore under NGR Rule 66(2), the AER may approve the variation without consultation.

Reasons for the variation application

In February 2017, the Australian Energy Market Commission made a rule change to harmonise the start time of the gas day used in the short term trading market hubs and the gas supply hub trading locations with the gas day start time used in the Victorian declared wholesale gas market.¹

Under that rule change, the gas day in each market at each location will start at 6.00am Australian Eastern Standard Time (AEST). This change will apply from 1 October 2019.²

The RSA reflects the current situation, with the following defined terms in the RSA referring to the gas day commencing at 06:30 AEST:

- Calendar Month
- Calendar Year
- Day
- Hour

The RSA needs to be amended so that from 1 October 2019, references to 06:30 AEST are changed to 06:00 AEST. This will be achieved through addition of a new clause 1.7 to the RSA (Schedule 5 of the access arrangement) in the form provided in Attachment A.

The Proposed Variation is Non-Material

In light of the criteria in the AER's 2009 Access Arrangement Guideline, Evoenergy considers that the variation proposed to the access arrangement is non-material because the variation will

¹ <https://www.aemc.gov.au/rule-changes/gas-day-harmonisation>.

² See National Gas (Capacity Trading and Auctions) Amendment Rule 2018, which revoked the AEMC's final rule and provided for the gas day to commence at 6am AEST from 1 October 2019.

simply align the terms of the RSA with the operation of the market, including the NGR, and will not have any impact on reference tariffs. Accordingly, Evoenergy considers that this application is capable of being approved by the AER under Rule 66(2) as a non-material variation.

If you wish to discuss any aspect of this proposal, please contact Patricia Cameron on 02 6248 3812 or patricia.cameron@actewagl.com.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Fiona Wright', with a long horizontal line extending to the right.

Fiona Wright

General Manager Evoenergy