

ECGS Projected Assessment of System Adequacy

High Level Implementation Assessment (HLIA)

August 2025

How the rule change may be implemented by AEMO



Important notice

Purpose

AEMO has prepared this document to provide preliminary information about the implementation design of the AEMC's *ECGS Projected Assessment of System Adequacy* draft rule published on 17 July 2025, before a final rule is made.

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1 Introduction

1.1 Rule change process

Background

On 17 July 2025, the Australian Energy Market Commission (AEMC) made a draft rule and determination to introduce two forecasts of reliability and supply adequacy (RSA) in the east coast gas system (ECGS) over the intra-year period. This response comes following a rule change request on 21 January 2025 by the Acting Chair of the Energy Senior Officials on behalf of the ECGC and the Honourable Lily D'Ambrosio MP. The rule change request is one of four rule changes proposed as part of Stage 2 of the ECGS reliability and supply adequacy reforms which build on the stage 1 reforms that expanded AEMO's functions under the NGL and NGR to better manage gas supply adequacy and reliability risks.

Issues

The proposed rule change seeks to address the lack of a regular, systematic, intra-year assessment of reliability and supply adequacy in the ECGS. The rule change request highlights that the tightening supply-demand balance, together with the energy transition and increasing interrelationship with the NEM, is expected to result in the ECGS becoming more exposed to intra-year reliability and adequacy threats. There is a greater risk therefore that supply interruptions may occur unexpectedly, limiting the ability of market participants to respond in a timely, informed and efficient manner. In addition to hindering market-led responses, the lack of a regular and systematic intra-year assessment could also hinder AEMO's ability to respond efficiently when the market fails to respond. It may also limit the ability of policy makers and jurisdictional Ministers to make timely, informed and efficient decisions.

Draft Rule

The draft rules set out key changes to the NGR to give effect to AEMO publishing a ECGS PASA that will cover the intra-year period. Under the proposed design, AEMO would be responsible for preparing and publishing both:

- An ST PASA with a daily publication frequency and 7-day outlook of demand, supply and infrastructure capacity as well as any actual or potential risks or threats to the reliability adequacy of supply for the ECGS and for each PASA region.
- An MT PASA with a weekly publication frequency and 12-month outlook of demand, supply and infrastructure capacity for the ECGS and for each PASA region.

The draft rules:

- consolidate participant ECGS reporting obligations into the Gas Bulletin Board rules in Part 18 of the NGR, removing the reporting obligations from the ECGS rules in Part 27 of the NGR.
- introduce additional reporting obligations on market participants to ensure AEMO has access to the information it needs for the ECGS PASA, while removing duplicative requirements.
- implement transitional arrangements to support a staged implementation of the ECGS PASA.

Benefits

The AEMC's draft determination considered that the draft rules would enhance transparency and efficiency in the ECGS by improving access to supply, demand and infrastructure availability information in the intra-year timeframe. This would support more informed and timely decision-making by AEMO, market participants, governments and policymakers.

Greater transparency of key inputs would support AEMO and facility operators to better manage reliability risks. While forecasts are inherently uncertain, a regular adequacy assessment helps reduce information gaps and supports more consistent decision-making across the market. Although the reforms involve some implementation and administrative costs, the AEMC notes that these are expected to be outweighed by the benefits. In some cases, costs could be reduced through streamlined reporting and modernised systems.

1.2 HLIA document overview

This High Level Implementation Assessment (HLIA) has been produced as a first step in AEMO's implementation of a ECGS projected assessment of system adequacy rule change as part of Stage 2 of the ECGS RSA reforms. Based on AEMO's understanding of the rule¹, this HLIA outlines high-level views of AEMO's system, process and operational changes and the indicative timeline that would likely be required. It also provides a general indication of what these changes may mean for market participants.

By publishing at an early stage before the AEMC's final determination and inviting participant feedback, the HLIA is intended to:

- Inform affected participants in developing their own implementation timelines and impact assessments
- Facilitate stakeholder feedback on the early implementation design and timeframes, including consistency with the draft rule
- Provide supporting information for stakeholders and AEMO to input into the AEMC's rule change process, including in relation to implementation timeframes, risks and feasibility.

This HLIA does not pre-empt the outcomes of the AEMC's ongoing rule change process and further details on the rule change can be found on the AEMC's website.

AEMO has identified a number of matters, including additional disclosure obligations and other changes, that are not captured in the draft rule but AEMO considers should be reflected in the final rule. AEMO will formally provide this feedback to the AEMC. These differences may impact participant implementation:

- The BB rules should specify only one BB reporting entity for an LNG export project instead of requiring LNG export projects to register separately to LNG export facilities, as a responsible reporting entity². AEMO expects that this arrangement would avoid system changes given all LNG export projects in the ECGS are currently reporting in this manner already, and would provide consistency with the current rules framework.

¹ Based on the draft determination and subsequent discussions with the AEMC.

² AEMO currently links everything to a facility ID, which can only be associated to a single BB reporting entity.

- Daily capacities for BB pipelines are to be reported by pipeline segment³, this is consistent with current reporting noting clarification has been added in to the NGR.
- Draft Rule 410 – the extension to 7 days for the Short Term Trading Market (STTM) bids should only apply to the price taker bids and not to the ex ante offers and ex ante bids.
- Draft rule 185A about LNG export projects providing AEMO with a forecast of the LNG processing facility’s daily consumption of gas, should include the quantity of covered gas required for feed gas.
- New participant disclosure obligations recommended in AEMO’s submission to the AEMC draft determination and rules. These obligations, which have been marked by an asterisk (*) when referenced throughout this HLIA document, are proposed by AEMO but may not be adopted in the AEMC’s final determination:
 - New disclosure obligation on BB pipelines to report actual linepack data for each linepack segment for the previous day, as noted in AEMO’s assessment of the requirements for a short and medium term PASA report⁴. AEMO expects that these actual linepack values for the prior gas day would be included within daily linepack forecast submissions that are provided for under draft rule 179A.
 - A new reporting obligation on LNG import facilities to provide shipping schedule information to AEMO to accompany MTCO reporting so that supply availability can be assessed. The reason for this recommendation is that LNG import terminal MTCO reporting presents unique challenges compared to production facilities – the capacity of the LNG import facility is not necessarily an indication of the supply available to be supplied, as it is dependent on a vessel being physically present. This distinction between capacity and actual supply availability is important for AEMO’s PASA modelling.

1.3 Key dates

Table 1: ECGS projected assessment of system adequacy rule and HLIA timeline

Activity	Timeline
AEMC Draft Rule and Determination published	17 Jul 2025
AEMO HLIA published	21 Aug 2025
AEMO industry briefing on HLIA	22 Aug 2025
Stakeholder submissions on AEMC’s Draft Determination due	28 Aug 2025
Stakeholder feedback on HLIA due	11 Sep 2025
AEMC Final Rule and Determination published	9 Oct 2025

1.4 Stakeholder feedback invited

AEMO welcomes any stakeholder feedback on this HLIA by COB 11 September 2025. Comments should be sent via email to GWCF_Correspondence@aemo.com.au.

³ Current proposal is no change to the exiting definition of pipeline segment.

⁴ AEMO, [Developing a projected assessment of system adequacy for the east coast gas system](#), October 2024.

Where appropriate, AEMO may publish updates to this HLIA to:

- Align with the AEMC's final rule if it is materially different to AEMO's understanding of the final rule;
- Accommodate industry feedback; and
- Provide further, more detailed information on implementation impacts and pathway.

Feedback on this HLIA is distinct from submissions to the AEMC's formal rule change consultation process. AEMO is seeking feedback specifically on implementation matters. Any feedback or submissions related to the rule change or draft determination should be provided directly to the AEMC.

2 AEMO Summary of key impacts

The table below depicts the key impacts to AEMO’s systems and processes from the ECGS PASA rule change.

Table 2: Indicative assessment of implementation impacts

People	Process and procedures	System
Low	Low	Medium
<ul style="list-style-type: none"> • Coordination with GSOO to ensure consistency in assumptions, particularly for methodologies and reporting, e.g., region definition. • Coordination of internal teams that will be required to provide input into the development of the ECGS PASA. 	<ul style="list-style-type: none"> • New internal operational procedures to support assessment and publication of ECGS PASA • New external PASA procedures, noting that PASA procedures will be included within the ECGS Procedures. • New processes for forecasting • New internal process for data validation of PASA inputs • Incorporation of elements of ECGS procedure into BB procedures. 	<ul style="list-style-type: none"> • Enhancements to BB systems for altered and new participant disclosure obligations • New PASA calculation engine and integration with input systems • New demand forecasting system for GPG forecasts across ST and MT • Changes to existing demand forecasting systems • Notification and alerting systems • New reporting system to report PASA outputs including visualisations

Table 3 lists the focus areas alongside descriptions of each impact from the rule change.

Table 3: Tabular view of focus area impacts from the draft rule

Focus area	Impact description	Impact change
Manage information	Handle new data inputs and validation	<ul style="list-style-type: none"> • Enhancements to BB systems for new and modified PASA inputs • Data validation processes for participant submissions • MTCO submission process modifications
Forecasting and assessment	Develop and apply demand forecasts	<ul style="list-style-type: none"> • New AEMO demand forecast for GPG demand • Modification of existing demand forecasts • Integration of new assumptions and inputs • New PASA calculation engine and integration with input systems
Reporting	Publish ECGS PASA outputs	<ul style="list-style-type: none"> • Development of new PASA report templates and visualisations • System changes to enable report publication
Notification and alerting	Communicate key PASA outcomes	<ul style="list-style-type: none"> • Establish alert thresholds and trigger logic • Alert system to trigger on potential or actual risks or threats to reliability or adequacy of supply. • Notification templates for industry and internal use • Integration with market participant systems
Operational procedures	Internal and external PASA procedures	<ul style="list-style-type: none"> • New internal procedures for PASA assessment and publication • New internal processes for forecasting • New internal processes for data validation of PASA inputs • New external PASA procedures

Focus area	Impact description	Impact change
System integration	Connect systems and streamline inputs	<ul style="list-style-type: none"> • Reporting integration with forecasting and BB system (input/output integration) • Integration of forecasting with BB system (inputs integration) • Streamline data flow between GSOO forecasts with MT PASA inputs

3 AEMO procedure impacts

This section indicates the high-level impact of the draft ECGS PASA rule on AEMO’s procedures and guidelines, based on the changes that AEMO anticipates would be required to implement this rule. Table 4 lists new and existing AEMO procedures and other external documentation that would likely need creating and updating.

Table 4: Relevant AEMO procedures and other documentation

Type of Document	Document Name	Effort required	Consultation Required	Content to be changed
Procedure (NEW)	PASA Procedures	High	Yes	<ul style="list-style-type: none"> • New Procedure to detail the inputs and outputs, methodologies, regional definitions, publication format and timing, and any additional outputs required to meet the PASA objective.
Procedure (existing)	East Coast Gas System Procedures	Low	Yes	<ul style="list-style-type: none"> • Removal of the way and circumstances in which information required to be provided to AEMO under Division 2 of Part 27 of the NGR must be provided. • Removal of the participant information provision obligations. • Removal of the concept of Part 27 retailers and inclusion of BB shippers, BB gas buyers and LNG export projects. • Removal of demand zones.
Procedure (existing)	BB Procedures	Low	Yes	<p>Inclusion of the following:</p> <ul style="list-style-type: none"> • The circumstances in which the additional disclosure obligations under Part 18 should be provided, including: <ul style="list-style-type: none"> – How linepack zones and pipelines segments must be determined – How linepack or types of linepack must be measured – When maintenance work is expected to affect the operation of a facility • Inclusion of BB shippers, BB gas buyers and LNG export projects. • Changes/additions to exemptions framework • The circumstances in which information must be reported to AEMO under draft rule 190H – events or circumstances affecting reliability of gas supply⁵.
Guide (existing)	East Coast Gas System Guidelines	Low	No	<ul style="list-style-type: none"> • Inclusion of ST and MT PASA as part of the identification of an actual or potential risk or threat given it is a new monitoring and assessment tool.

⁵ The AEMC draft rule has not yet provided for this however AEMO is of the view that this is required in the BB Procedures and will provide this feedback in a formal submission.

Type of Document	Document Name	Effort required	Consultation Required	Content to be changed
				<ul style="list-style-type: none"> Update process flow for monitoring, assessment and conferences relating to actual or potential risks or threats to the reliability or adequacy of the supply of natural gas in the ECGS.
Guide (existing)	BB Data Submission Guide	Low	No	<ul style="list-style-type: none"> Removal of Part 27 Identifiers Removal of duplicative submissions from Part 27. Accounting for changes to participant submission in the BB: <ul style="list-style-type: none"> Change from ad hoc reporting of MTCO to daily capacity numbers MTCO reporting of recall times only necessary when maintenance activity is being carried out Altered submission for LNG export projects to report extended daily demand forecast reporting horizon out to 12-months Altered BB large user facility reporting of maintenance work including start and end dates, and the subsequent impact on expected daily gas demand Incorporation of pipeline segments into BB rules Reporting of event or circumstances affecting reliability of gas supply *New daily reporting of actual linepack data by linepack segment for the previous day by BB pipelines *New reporting obligation on LNG import facilities to provide shipping schedule information to AEMO to accompany MTCO reporting.
Guide (existing)	BB Aggregation Methodology	Low	No	No changes identified
Guide (existing)	Guide to Gas Bulletin Board Reports	Low	No	<ul style="list-style-type: none"> Change to MTCO data report format Incorporate of pipeline segments into BB rules *Incorporate new daily reporting of actual linepack data by linepack segment for previous day

3.1 Development of new PASA Procedures

The draft rule requires AEMO to develop and maintain new PASA Procedures for the ST and MT PASA, setting out the inputs, methodologies, outputs and processes that underpin the new ECGS PASA framework. The development of these PASA Procedures is one of the most significant procedural impacts associated with this rule change and is necessary to give effect to the obligations placed on AEMO in the NGR. These procedures would include detail on the following:

- The methods AEMO will use to prepare the inputs to the PASA
- The process for AEMO to determine regions
- The process, and information and methodologies to be used by AEMO when preparing the PASA
- The outputs to be published as part of the PASA

- The manner and form in which the PASA outputs will be published, including how this information will be aggregated or disaggregated
- The timetable for publication of the PASA
- Any other additional outputs AEMO considers is necessary to promote the PASA objective

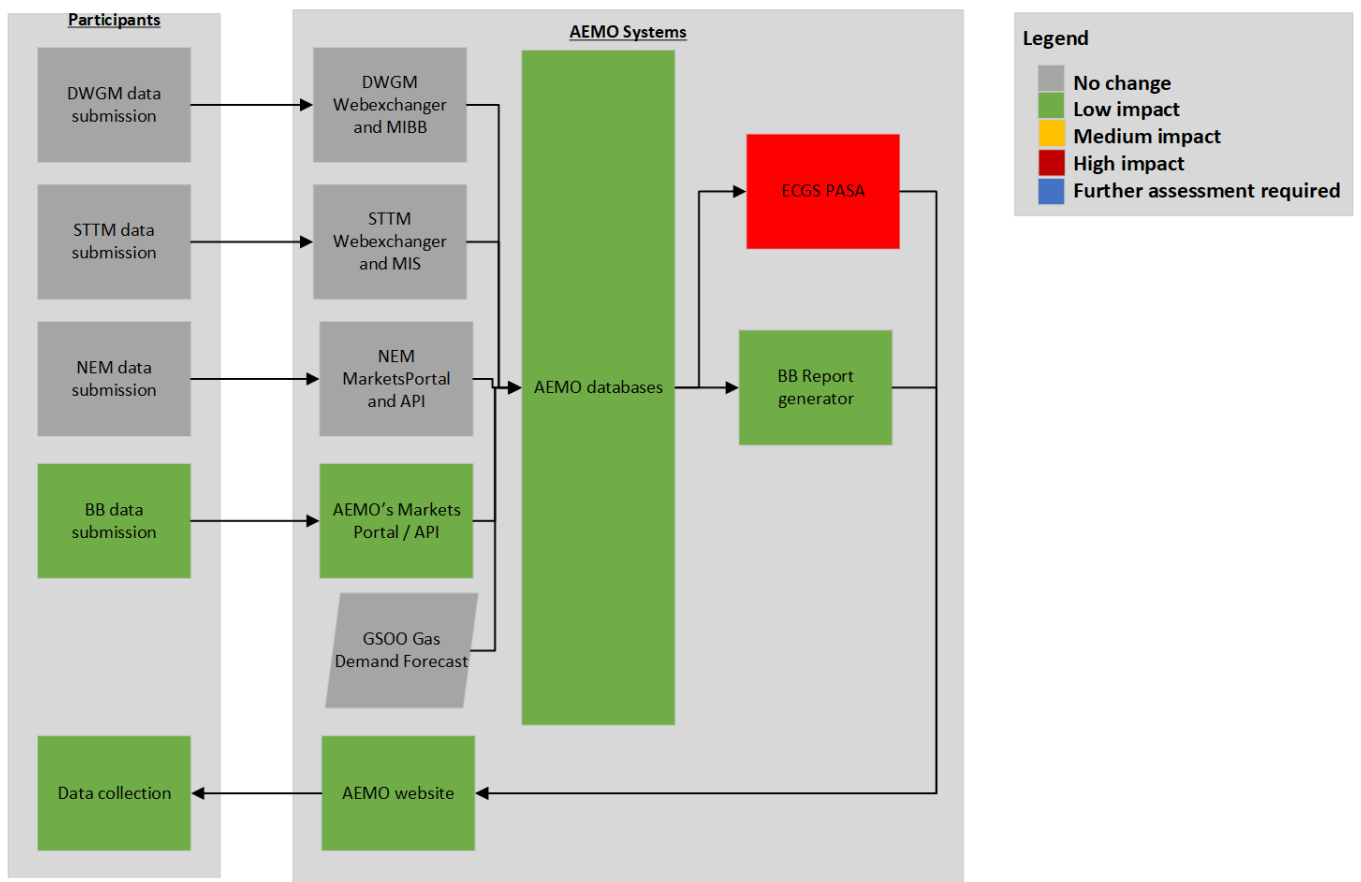
The development of these procedures will be subject to consultation following the AEMC's final rule determination. AEMO will seek opportunities to align this consultation with related procedure changes such as the ECGS and BB Procedures.

4 AEMO system impacts

4.1 System and data exchange overview

The introduction of an ECGS PASA framework requires system changes across AEMO’s data exchange, forecasting, and operational platforms in addition to the design and development of new systems such as a PASA calculation engine. Figure 1 illustrates an indicative assessment of the AEMO system impacts associated with implementation of the ECGS PASA.

Figure 1 Participant Interaction Impacts



4.1.1 System Impacts

Table 4 provides a summary of AEMO’s indicative system impacts required to support the implementation of the ST and MT PASA processes.

Table 4: AEMO System Impacts

AEMO System	Summary of impact	Impact Rating
Data Model and Interchange (BB systems)	<ul style="list-style-type: none"> Enhancements to data inputs and validation processes to accommodate new and modified PASA inputs. Modifications to reporting and data publication. Modification of the MTCO submission process to capture daily outlooks – potential new database table. New submission type for LNG export daily demand for 12-month forecast, and *linepack actual data reporting. New exemptions and standing/default data framework. 	Low
Markets Portal	<ul style="list-style-type: none"> Impact to APIs used in markets portal and direct APIs 	Low
Compute & cloud (ECGS PASA)	<ul style="list-style-type: none"> Design and development of a new PASA calculation engine to perform the core PASA supply-demand balance calculations. Implementation of algorithms and models to apply reliability standards and identify shortfalls. Integration with input data sources and output publication systems. Automated and manual triggering of PASA. Storage and compute of PASA runs 	High
Forecasting systems	<ul style="list-style-type: none"> Development or enhancement of models and methodologies for producing detailed AEMO demand forecasts, including regional breakdowns and GPG modelling. Integration of new data inputs and assumptions into forecasting processes. 	Medium
Notification and alerting systems	<ul style="list-style-type: none"> Establish new processes to monitor PASA outcomes and trigger alerts based on thresholds. Develop templates and distribution for PASA-related communications. 	Low
Data validation and quality control	<ul style="list-style-type: none"> Enhancement of existing data validation rules and processes to accommodate PASA-specific requirements. Development of data quality monitoring and reporting capabilities if necessary, including forecast vs actuals data for relevant information. 	Medium
Reporting and visualisations	<ul style="list-style-type: none"> Implement new reporting templates and visualisations for PASA outputs including automated charts and report generation. 	Medium
Operational processes and interfaces	<ul style="list-style-type: none"> Establish new operational procedures for conducting PASA runs. 	Low

5 Participant impact assessment

The ECGS PASA rule change introduces some altered or new obligations on market participants given the removal of Part 27 reporting obligations and consolidation of obligations into the BB Rules. This section identifies a list of proposed changes and AEMO’s view of the impact on different participants. It does not address updates that participants may make within their systems to support business processes and given the diverse levels of system maturity and automation across participants, AEMO cannot predict the exact scale or nature of the impacts for each participant. AEMO recommends that each participant perform their own detailed analysis of the rule change. While the level of impact will depend on each

participant’s system maturity and internal processes, Table 5 below outlines the common system and operational impacts expected across key participant types.

Table 5: Indicative high-level participant impact⁶

IMPACTED PARTICIPANT TYPE	INDICATIVE HIGH-LEVEL IMPACT	COMMENT
Reporting obligations		
DWGM participants	Low: Impact on demand forecasts only	<ul style="list-style-type: none"> Mandatory demand forecasts for gas days D+2 to D+6. Some DWGM participants are already providing this information.
STTM participants	Low: Impact on price-taker bids only	<ul style="list-style-type: none"> Mandatory price-taker bids for D+3 to D+6. Some STTM participants are already providing this information.
BB facilities⁷ (excl. BB large users)	Medium: BB reporting system changes	<ul style="list-style-type: none"> Weekly submissions at daily resolution of medium term capacity outlook (MTCO), out to 24 months. Change from ad-hoc reporting of MTCO to daily figures. MTCO reporting of recall times only necessary when maintenance activity is being carried out.
LNG export project	Medium: BB reporting system changes	<ul style="list-style-type: none"> Weekly submission at daily resolution of demand forecasts, out to 12-months. Change from monthly to weekly reporting on forecast demand and extending the outlook period from 6 months to 12 months, daily data rather than monthly.
BB pipelines	Low: BB reporting system changes	<ul style="list-style-type: none"> Reporting of pipeline segment nameplate rating, and daily STCO (7-day outlook) & daily MTCO (24-month outlook) by pipeline segment. No change other than MTCO reporting, or if there is the creation of new segments. *New daily reporting of actuals linepack data by linepack segment for the previous day.
BB shippers	Medium: New system and/or processes (to the extent systems and/or processes are not already in place)	<ul style="list-style-type: none"> Provide BB facility operators a daily good faith best estimate of use of facility for days D to D+6. AEMO expects that compliance monitoring and communications would be managed via the relevant facility operator in the first instance.
BB gas buyers	Medium: New system and/or processes (to the extent systems and/or processes are not already in place)	<ul style="list-style-type: none"> Provide BB facility operators for any BB production facility or LNG import facility for which the BB gas buyer has rights to nominate supply with a daily good faith best estimate of use of facility for days D to D+6. AEMO expects that compliance monitoring and communications would be managed via the relevant facility operator in the first instance.
*LNG import facilities	Low: BB reporting system changes	<ul style="list-style-type: none"> * A new reporting obligation on LNG import facilities to provide shipping schedule information to AEMO to accompany MTCO reporting so that supply availability can be assessed.
Other potential impacts		

⁶ Any transfer of reporting requirements from Part 27 to Part 18, that are otherwise unchanged, have not been included in this table. One such reporting requirement is the reporting of linepack outlooks for BB pipelines.

⁷ Includes BB production facilities, BB pipelines, BB blended gas distribution systems, BB blend processing facilities, BB storage facilities, BB compression facilities and LNG processing facilities.

IMPACTED PARTICIPANT TYPE	INDICATIVE HIGH-LEVEL IMPACT	COMMENT
All market participants (opt-in) ⁸	Medium: May opt in to receive automated notifications and alerts relating to ECGS PASA outputs from AEMO	<ul style="list-style-type: none"> • Potential system integration needed to consumer alerts via APIs or participant portals. • Internal processes may need to be updated to action AEMO alerts.

5.1 Implementation pathway

The AEMC draft determination sets out a staged implementation process for AEMO to update the ECGS and BB Procedures and for the PASA to be finalised and operating before Winter 2027, starting 3 May 2027. The draft determination gives AEMO five months to undertake the consultation process and update procedures. However, given the potential complexity around the substantial details of the PASA and the need for adequate industry engagement, AEMO considers an extended consultation period to be necessary. Allowing six months for procedure consultation will better accommodate the holiday period and provide participants with sufficient time to prepare responses.

A PASA go-live in May 2027 presents risks, primarily related to the digital delivery of this project given the complexity of developing GPG forecasts and implementing a fit-for-purpose methodology in the given timeframe. AEMO has committed to a significant schedule of technology delivery particularly in the second half of 2026. Given the proposed go-live of 1 March 2027 for information disclosure obligations to commence, this would require AEMO to have the system to be developed by the end of 2026 for participant testing to commence. Additionally, the current delivery would overlap with GSOO and VGPR delivery timings, noting this will impact AEMO business teams involved in the (MT) PASA development work. Implementing this rule change requires AEMO to develop an entirely new PASA system and coordination with industry such that the data inputs used to produce the outputs are reliable. AEMO's broader digital delivery schedule also reflects competing priorities across 2026, with overlapping projects creating a congested implementation landscape.

Further, any issues after a May 2027 go-live would coincide with the winter peak period, potentially impacting market confidence and responsiveness to the new ECGS PASA. Therefore, AEMO recommends delaying the new information disclosure obligations from 1 March 2027 to 2 September 2027 and the PASA commencement from 3 May 2027 to 27 October 2027. This still results in some industry testing occurring in late winter of 2027 but positions a full go-live in the shoulder period. This would then allow the MT PASA to start serving as an early warning system ahead of winter 2028.

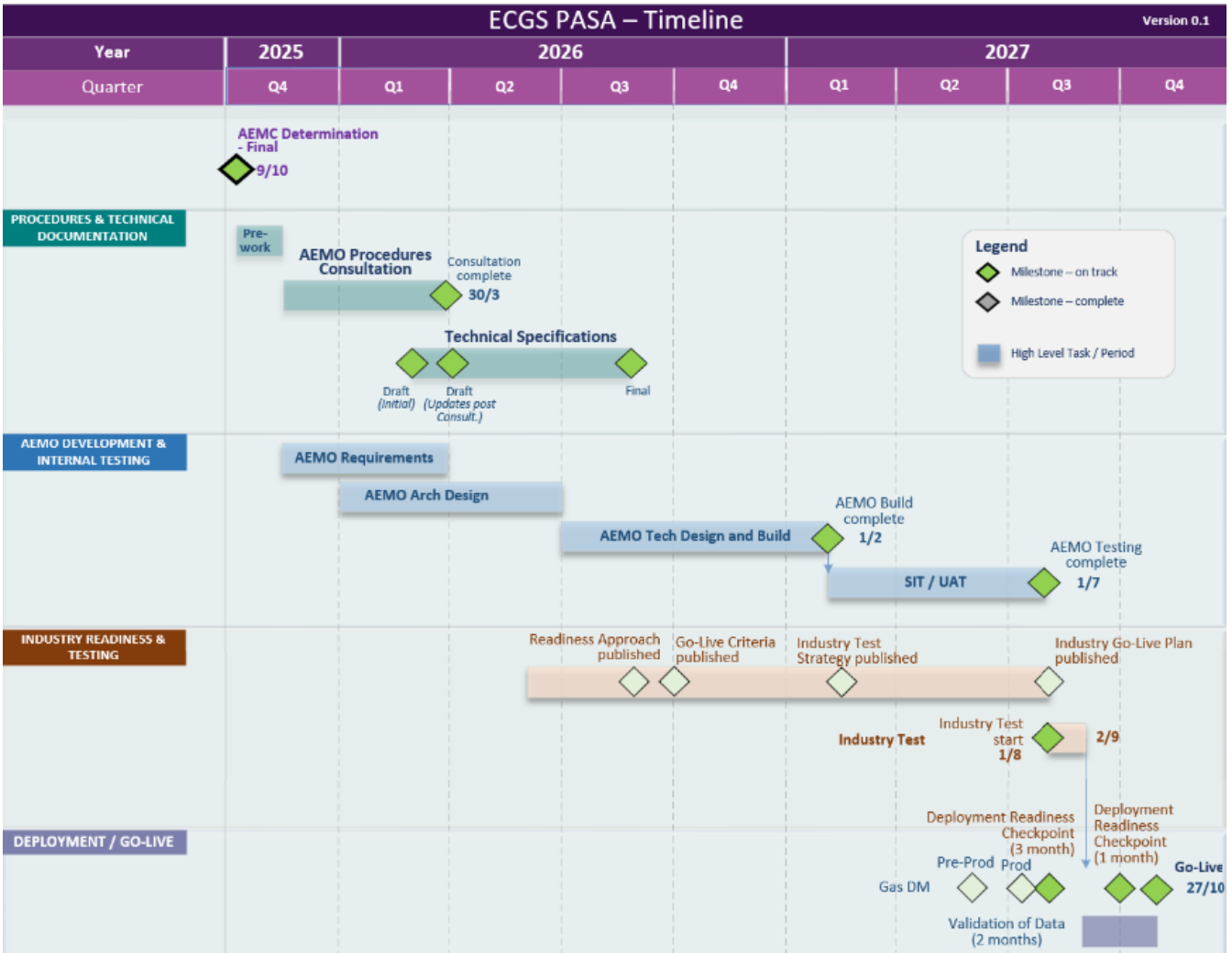
Based on all of the above, AEMO prefers a go-live date of 27 October 2027 and considers that this would reduce delivery risk and ensure that both AEMO and industry system development can be completed without compression. Key milestones in the preferred pathway as shown in Figure 2 include:

- Procedures consultation concluding 30 March 2026
- Technical specification finalisation in Q3 2026 to lock in system requirements
- Industry testing commencing 1 August 2027

⁸ Inclusion of this potential impact does not imply AEMO is committing to implement an automated notification or alerting system. It is noted here as a possible participant impact should such functionality be developed by AEMO.

- Participant information disclosure obligations commencing 2 September 2027
- Go-live on 27 October 2027, allowing two months of data validation.

Figure 2 AEMO preferred implementation timeline



AEMO has outlined a high-level view of proposed readiness activities to support implementation of the ECGS PASA. The approach includes indicative timing, key system dependencies and areas where further guidance or testing support will be developed. Table 6 below summarises AEMO’s initial readiness planning across core areas.

Table 6: Indicative industry readiness approach

READINESS AREA		INITIAL VIEW OF INDUSTRY READINESS APPROACH
AEMO PASA trial	Industry Test strategy	<ul style="list-style-type: none"> • AEMO expects testing to focus on the new or altered participant disclosure obligations. • More communications around the industry test period and strategy will be made available closer to date.

READINESS AREA		INITIAL VIEW OF INDUSTRY READINESS APPROACH
	Test plans and coordination	<ul style="list-style-type: none"> Test plans will be developed and communicated with industry.
Participant development support	Procedures	<ul style="list-style-type: none"> The draft determination indicates that AEMO would need to update our ECGS and BB procedures by 5 March 2026, however AEMO prefers this deadline to be extended to 30 March 2026 as noted above. The amendments to the ECGS and BB procedures are anticipated to have dependencies with AEMO’s development and testing. For all new and existing procedures, AEMO would look for opportunities to prioritise and/or bundle procedure consultations.
	Technical specifications	<ul style="list-style-type: none"> AEMO will publish draft technical specifications after the relevant Procedures have been finalised and with sufficient time before the commencement of industry testing to support participant development.
	Environment availability	<ul style="list-style-type: none"> AEMO’s pre-production will be available to support industry testing for during industry test period (e.g. LNG export 12-month demand and MTCO daily submissions).
Transition and go-live	Go-live plan	<ul style="list-style-type: none"> The go-live plan will be communicated with industry via industry forums and email notifications in the lead up to rule commencement.
	Registration plans	<ul style="list-style-type: none"> The draft transition rule 4(1) indicates that a relevant entity who before the effective date is registered with AEMO as the responsible reporting entity under rule 715 for the purposes of Part 27 under the existing rules will be taken to be registered under rule 150A of the new rules. However, as noted above in section 1.2 of this HLIA, AEMO is of the view that the BB rules should specify only one BB reporting entity for an LNG export project. Consequently, the transition rule will need to be altered for LNG export projects to be registered under Part 18 as the BB reporting entity.
Engagement support	Forums	<ul style="list-style-type: none"> AEMO will support affected market participants during procedure development and industry testing. Support will be provided as required via the Gas Wholesale Consultative Forum (GWCF) and via the monitored GWCF_correspondence@aemo.com.au mailbox.
	Educational material	<ul style="list-style-type: none"> AEMO will make educational materials available to support awareness, assessment and preparation for affected participants. This may include guides, factsheets, FAQs and industry presentations.

5.2 Risks

Table 7 considers the risks associated with the proposed implementation approach discussed above.

Table 7: Initial assessment of implementation risks

IDENTIFIED RISK	CURRENT RATING	MITIGATION STRATEGIES	RESIDUAL RATING (AFTER MITIGATION)
Scope, complexity and timing of final rule could affect AEMO’s ability to meet the rule commencement date	High	<ul style="list-style-type: none"> Continued engagement between AEMC, AEMO and industry. 	Medium

IDENTIFIED RISK	CURRENT RATING	MITIGATION STRATEGIES	RESIDUAL RATING (AFTER MITIGATION)
Lack of market participant understanding/compliance with the relevant NGR reporting obligations. Given the integrity of the ECGS PASA relies on the quality of data from participants.	High	<ul style="list-style-type: none"> Targeted stakeholder engagement and education to improve understanding of new and altered reporting obligations. Clear guidance materials and FAQs to be published alongside new procedures if required. Engagement with the AER to reinforce compliance expectations and provide consistent messaging to participants. 	Medium
Lack of confidence in AEMO's PASA outputs.	High	<ul style="list-style-type: none"> The two-month window proposed for validating PASA results prior to go-live. AEMO development of quality assurance processes to identify and resolve data or modelling issues early. 	Medium
AEMO digital environment and release landscape congestion could affect AEMO's ability to meet the rule commencement date.	High	<ul style="list-style-type: none"> Prioritisation of critical releases related to the ECGS PASA to ensure the most important system changes are deployed first. Regular progress reviews and assessments to monitor the implementation status and identify any emerging issues. Alignment with AEMO's internal project and release planning processes. 	High

6 Related reforms

Table 8 sets out the interrelationship between the ECGS PASA rule change and other stage 2 ECGS RSA reforms.

Table 8: The draft rule's relationship with other key initiatives

Gas RSA Reforms	Relationship to ECGS PASA
Reliability standard	<ul style="list-style-type: none"> PASA forecasts may inform whether the reliability standard is expected to be met, noting that the reliability standard rule change process is ongoing and will be finalised after the PASA rule.
Notice of closure	<ul style="list-style-type: none"> Closure data may feed into PASA modelling of supply adequacy.

A1. Impact ratings

Description of AEMO’s reform impact ratings for industry systems, processes and documentation

Impact rating	Description	Comments
No impact	<ul style="list-style-type: none"> No changes to AEMO or industry systems, processes, guidelines, or procedures Stakeholder consultation not required 	<ul style="list-style-type: none"> No changes.
Immaterial	<ul style="list-style-type: none"> Immaterial impact to AEMO or industry systems, process, guidelines, or procedures Stakeholder feedback sought 	<ul style="list-style-type: none"> Immaterial administrative changes to AEMO procedures and/or guidelines, purposes of consistency Immaterial changes or additions to existing business processes and/or technology systems. Stakeholder consultation not required
Low	<ul style="list-style-type: none"> Low impact to AEMO or industry systems, processes, guidelines, or procedures Stakeholder consultation may be required or feedback sought 	<ul style="list-style-type: none"> Minor changes, additions, or updates to AEMO procedures and/or guidelines, purposes of consistency Minor changes, additions, or updates to existing business processes and/or technology systems Stakeholder consultation not anticipated but may be required
Medium	<ul style="list-style-type: none"> Medium impact to AEMO or industry systems, processes, guidelines, or procedures Stakeholder consultation required 	<ul style="list-style-type: none"> Material changes or additions to AEMO procedures and/or guidelines Significant changes or additions to existing business processes and/or technology systems Stakeholder consultation required
High	<ul style="list-style-type: none"> High impact to AEMO or industry systems, processes, guidelines, or procedures Stakeholder consultation required 	<ul style="list-style-type: none"> Significant changes, additions, or creation of new AEMO procedures, and/or guidelines Significant changes, additions, or the creation of new business processes and/or technology systems Stakeholder consultation required
Very High	<ul style="list-style-type: none"> Large impacts to AEMO or industry systems, processes, guidelines or procedures Stakeholder consultation required 	<ul style="list-style-type: none"> Large changes, additions or creation of new AEMO procedures and/pr guidelines Major changes, additions or creation of new business processes and/or technology systems Stakeholder consultation required

A2. Glossary

This document uses many terms that have meanings defined in the National Gas Rules (NGR). The NGR meanings are adopted unless otherwise specified.

Please also see AEMO's [industry terminology web page](#) to complement the table below.

TERM	DEFINITION
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
API	Application Programming Interface
BB	Bulletin Board
DM	Data Model
DWGM	Declared Wholesale Gas Market
ECGS	East Coast Gas System
FAQ	Frequently Asked Questions
GPG	Gas-powered generation
GSOO	Gas Statement of Opportunities
GWCF	Gas Wholesale Consultative Forum
HLIA	High-level Implementation Assessment
LNG	Liquefied Natural Gas
MIBB	Market Information Bulletin Board
MIS	Market Information System
MT	Medium-Term
MTCO	Medium-Term Capacity Outlook
NEM	National Electricity Market
NGL	National Gas Law
NGR	National Gas Rules
PASA	Projected Assessment of System Adequacy
RSA	Reliability and Supply Adequacy
SIT	System Integration Testing
ST	Short-Term
STCO	Short-Term Capacity Outlook
STTM	Short Term Trading Market
UAT	User Acceptance Testing