

Subject	Gas (Downstream Reconciliation) Rules 2008 Guideline note rule 30.3 – flagging of estimates for allocation group 1 and 2 consumption data
Version	2.0
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1. Introduction

1.1 Rules 31.1, 32.1 and 33.1 of the Gas (Downstream Reconciliation) Rules 2008 ('the Rules') require that retailers submit daily metered energy quantities to the allocation agent for each consumer installation in allocation groups 1 and 2. Rule 5 gives the following definition of daily metered energy quantities:

[Q]uantities taken from metering equipment with a datalogger fitted that records daily information or if the data from metering equipment is unavailable or unreliable, are quantities determined in accordance with the responsible allocation participant's best estimate consistent with Schedule 1 or Schedule 1A as applicable;

1.2 Rule 30.3 sets out the requirement on retailers to advise the allocation agent where a daily metered energy quantity provided under one of the above rules was not taken from the relevant day's register reading. Retailers satisfy this requirement by flagging such quantities as estimates in the consumption files sent to the allocation agent.

1.3 The purpose of this guideline note is to clarify for retailers when they are to flag estimated consumption information provided to the allocation agent for allocation groups 1 and 2.

1.4 This note is explanatory in nature and is not legally binding. It needs to be read in conjunction with the Rules and the general approach set out in this note in no way reduces the requirement upon allocation participants to know and comply with their obligations under the Rules. This note may be amended from time to time.

2. Background

2.1 Rules 29.4.1, 30.1, 31.1, 32.1 and 33.1 all place an obligation on retailers to provide the allocation agent with daily metered energy quantities that have been taken from that day's

register reading for each consumer installation in allocation groups 1 and 2. These quantities must be provided to the allocation agent by:

- (a) 1200 hours on the 4th business day of the month that immediately follows the consumption period to which the information relates, for initial allocation;
- (b) 0800 hours on the 9th business day of the 4th month that follows the consumption period to which the information relates, for interim allocation; and
- (c) 0800 hours on the 14th business day of the 13th month that follows the consumption period to which the information relates, for final allocation.

2.2 If, for whatever reason, a retailer is unable to provide the allocation agent with daily metered energy quantities from that day's register reading for a consumer installation in allocation groups 1 or 2 per the requirement in rules 31.1, 32.1 and 33.1, then rule 30.3 applies. Specifically, in accordance with the definition of daily metered energy quantities in rule 5 and Schedule 1, a retailer must provide its best estimate of consumption information to the allocation agent, and advise the allocation agent of the fact that it is an estimate provided in accordance with rule 30.3.

3. Advising the allocation agent of estimated allocation group 1 or 2 consumption information

- 3.1 The rule 30.3 requirement to advise the allocation agent of daily metered energy quantities not taken from that day's register reading for a consumer installation in allocation groups 1 or 2 is the reason for the 'estimate indicator' field in the GAS050 file format determined by Gas Industry Co.¹
- 3.2 It is important to note that the 'estimate indicator' field in the GAS050 applies, and therefore needs to be completed, for each allocation submission (ie initial, interim, and/or final allocations²) for each day of a consumption period where data is unavailable.
- 3.3 If, for example, the data for an allocation group 1 or 2 consumer installation is unrecoverable, then the retailer will need to provide its best estimate of consumption information to the allocation agent for not only the initial allocation undertaken for that consumption period, but also for the interim and final allocations (and as required, for any special allocations). In addition, for each allocation, the retailer will need to flag this estimated allocation group 1 or 2 consumption information in the GAS050 file. On the other hand if the data is unavailable at the initial allocation due to a telemetry issue but can be obtained in time for submission at the interim and final allocations, then estimation is only required (and should only be flagged) at the initial.

¹ See '[Notice by the Industry Body \(Gas Industry Co\) under rule 25 of the Gas \(Downstream Reconciliation\) Rules 2008 specifying information exchange file formats](#)', version 1.2, dated 3 November 2008.

² Including, as required, for any special allocations.

3.4 Prior to the amendments to the Rules taking effect on 1 June 2013, any estimated TOU volumes submitted by retailers in the GAS050 file would form the basis of breaches alleged by the allocation agent of rules 31.1, 32.1 and/or 33.1. The amendments to the Rules make provision for estimates so breaches will no longer be routinely alleged by the allocation agent. The frequency of TOU estimation will still be monitored by the allocation agent and Gas Industry Co and each retailer's estimation methodology will be reviewed periodically against Schedule 1 as part of the performance audits commissioned under rule 65.

4. Estimated consumption information for allocation groups 3, 4, 5, 6

4.1 For consumption information pertaining to allocation groups 3, 4, 5 and 6, the requirement under rules 31, 32 and 33 is for retailers to provide either daily or monthly profiled energy quantities – subject to the meter reading and accuracy obligations under rules 26 to 30 and historical and forward estimate provisions in rules 34 to 37. Consumption information for these allocation groups will consist of a combination of forward estimates and historical estimates, calculated in accordance with those rules. Therefore, the 'estimate indicator' does not apply to allocation group 3 consumption information in the GAS050 file. Instead, the 'Quantity of Historical Estimate' field is to be used.

5. Validated register readings and permanent estimates

5.1 Rule 5 provides for 'validated register readings' to mean either a register reading or a permanent estimate which has passed an allocation participant's validation process. However, it is important to note that, under the Rules, this definition is only relevant to consumption information for consumer installations in allocation groups 3, 4, 5 and 6 – see rules 29.4.3, 29.5, 35 and 36.

5.2 Under the Rules, the concept of validated register readings (including permanent estimates which have passed a validation process) is not relevant to the submission of consumption information for consumer installations in allocation groups 1 and 2. That concept is only relevant for the purpose of the Rules in respect of consumption information for non-TOU consumer installations – see rules 29.5, 34 and 35 – so as to address the frequency of meter readings, and the calculation of historical and forward estimates, for allocation groups 3 to 6.

5.3 Accordingly, daily register readings (or daily recorded quantities) are required for allocation group 1 and 2 consumer installations. So, if an allocation participant must use a permanent estimate for a consumer installation in allocation group 1 or 2, then that allocation participant will need to flag this estimate in the GAS050 file for each of the initial, interim and final allocations (and, as required, for any special allocations).