

Gas Advisory Board

Agenda

Meeting No.	17
Location:	IMO Board Room Level 17, Governor Stirling Tower, 197 St Georges Terrace, Perth
Date:	Tuesday 14 th October 2014
Time:	1:00 PM – 3:00 PM

Item	Subject	Responsible	Time
1.	WELCOME	Chair	2 min
2.	MEETING APOLOGIES / ATTENDANCE	Chair	2 min
3.	MINUTES OF PREVIOUS MEETING	Chair	5 min
4.	ACTIONS ARISING	Chair	5 min
5.	GSI RULES AND PROCEDURES		
	a) Overview of the Rule Change Process	IMO	20 min
	b) GPC_2014_01: GSI Fee Arrangements	IMO	20 min
6.	DEVELOPMENT OF A WA GAS MARKET : OVERVIEW OF SUBMISSIONS RECEIVED	IMO	30 min
7.	GENERAL BUSINESS	IMO	5 min
8.	NEXT MEETING: Tuesday 16th December 2014		



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DRAFT
Gas Advisory Board
Minutes

Meeting No.	16
Location	IMO Board Room Level 17, Governor Stirling Tower, 197 St Georges Terrace, Perth
Date	Wednesday, 16 July 2014
Time	3.00 PM – 5.00 PM

Attendees	Class	Comment
Allan Dawson	Chair	
Kate Ryan	Independent Market Operator (IMO)	
John Jamieson	Pipeline Owner/Operator	
Mark Cooper	Pipeline Owner/Operator	
Pete Di Bona	Gas Producer	
Stewart Gallagher	Gas Producer	
Andrew Sutherland	Gas Shipper	
Mike Lauer	Gas Shipper	
Ian Mumford	Large Gas User	
Michael Smythe	Large Gas User	Proxy
Ray Challen	Coordinator of Energy	
Natalia Kostecki	Small End Users, Minister's Appointee	Proxy
Nerea Ugarte	Minister's Appointee – Observer	
Natalie Jackson	Economic Regulation Authority – Observer	Proxy
Trent Morrow	Market Reform	Presenter
Kevin Vas	Santos	Observer
William Pham	Santos	Observer
Carole Clare	Synergy	Observer
Tim Middlehurst	IMO	Observer
Laura Koziol	IMO	Observer
Erin Stone	IMO	Observer
Joachim Tan	IMO	Observer
Courtney Roberts	IMO	Minutes
Apologies	Class	Comment
Mike Shaw	Large Gas User	Proxy attended

Stan Reid	Gas Shipper	
Aden Barker	Small End Users, Minister's Appointee	Proxy attended
Elizabeth Walters	Economic Regulation Authority – Observer	Proxy attended

1.	<p>WELCOME</p> <p>The Chair opened the meeting at 3:00 PM and welcomed all members to the 16th Gas Advisory Board (GAB) meeting.</p> <p>The Chair welcomes all new members to the GAB and thanked the departing members for their contribution over the past year.</p> <p>The Chair also provided a brief introduction to the 2014/15 GAB members, outlined the GAB's role and reminded members that they have been appointed as individual members to represent their class and to act in the best interests of the Western Australian gas industry.</p>	
2.	<p>MEETING APOLOGIES / ATTENDANCE</p> <p>The following apologies were received:</p> <ul style="list-style-type: none"> • Aden Barker (Small End User); • Stan Reid (Gas Shipper); • Mike Shaw (Large Gas User); and • Elizabeth Walters (Economic Regulation Authority – Observer). <p>The following proxies were noted:</p> <ul style="list-style-type: none"> • Natalia Kostecki for Aden Barker (Small End User); • Michael Smythe for Mike Shaw (Large Gas User); and • Natalie Jackson for Elizabeth Walters (Economic Regulation Authority – Observer). <p>The following presenters/observers were noted:</p> <ul style="list-style-type: none"> • Trent Morrow (Market Reform); • Carole Clare (Synergy); • Kevin Vas (Santos); • William Pham (Santos); • Erin Stone (IMO); • Tim Middlehurst (IMO); • Joachim Tan (IMO); • Laura Koziol (IMO); and • Courtney Roberts (IMO). 	
3.	<p>MINUTES OF PREVIOUS MEETING</p> <p>The minutes of GAB Meeting No. 15, held on 20 May 2014 were circulated prior to the meeting.</p> <p>Mr Mark Cooper requested a minor amendment to Agenda Item 5a (GPRC_2014_01: GSI Fee Arrangements) to clarify that end-users <u>should</u> be the ultimate beneficiaries of the GSI and therefore <u>should</u> bear the costs.</p> <p>No further comments were raised and the minutes of the previous meeting were accepted as a true record.</p> <p><i>Action Point: The IMO to amend the minutes from Meeting No. 15 to reflect the agreed change and publish the final version.</i></p>	IMO

4.	<p>ACTIONS ARISING</p> <p>Ms Kate Ryan advised the GAB that action item 43 had now been completed and would be discussed under Agenda Item 5a and outstanding action item 49 would be discussed under Agenda Item 6. Ms Ryan noted that all other action items had been completed.</p>	
5a.	<p>GRC_2014_01: GSI FEE ARRANGEMENTS</p> <p>The Chair introduced Dr Natalia Kostecki to present the changes to the Rule Change Proposal to allocate a proportion of the Gas Services Information (GSI) Fees to Registered Production Facility Operators, on behalf of the Minister for Energy.</p> <p>Dr Kostecki noted that the Rule Change Proposal contained a new Civil Penalty Provision which would require changes to the GSI Regulations.</p> <p>Dr Kosteki also highlighted that the Rule Change Proposal included a new amendment to the definition of Aggregated Shipper Delivery Quantity to remove the double counting of gas transported through a Storage Facility.</p> <p>The Chair noted that the Public Utilities Office had formally submitted the Rule Change Proposal on 9 July 2014 and the IMO had published the Rule Change Notice on 15 July 2014.</p> <p>The Chair noted that the IMO had canvassed opinions on the methodology for allocating fees during the development of GSI Rules. The Chair reiterated the IMO's previously stated view, that it considered the approach proposed in this Rule Change Proposal would also be consistent with the GSI Objectives.</p> <p>GAB members questioned the next steps in the rule change process. The Chair clarified that the proposal was being progressed under the Standard Rule Change Process and would therefore involve two submission periods, after which the IMO would produce a report outlining the issues and responding to any submissions.</p> <p>Mr Mike Lauer noted that many Production Facility Operators would be able to pass the costs on to Shippers as there were provisions in most contracts for this pass-through.</p> <p>Mr Pete Di Bona questioned how the decision to accept the proposed changes was made. The Chair explained that, the IMO made its decision in the Final Rule Change Report but, as the proposal contained changes to Protected Provisions, the proposed Amending Rules would also require Ministerial approval. Mr Stewart Gallagher asked whether this was the Minister for Energy. The Chair confirmed that it was.</p> <p>The Chair offered to provide GAB members with an overview of the rule change process at the next GAB meeting. Ms Ryan also offered the IMO's support to Gas Market Participants with respect to the rule change process as any questions arise.</p> <p><i>Action Point: The IMO to provide an overview of the rule change process at the next GAB meeting.</i></p>	IMO

6. DEVELOPMENT OF A WA GAS MARKET

The Chair provided the GAB with an overview of the views provided in the consultation to date, including the industry stakeholder workshop held prior to the GAB meeting.

GAB members discussed their views on the suitability of the existing exchange platforms to the industry's needs.

GAB members also discussed the IMO's proposal to initially recover any shortfall in revenue associated with the development and operation of a market through GSI Fees. Some members noted that the proposal was not on a user-pays basis but should be. Mr Lauer stated that he believed that Shippers would be supportive of the proposal if it was voluntary and it was on a user-pays basis.

Some GAB members expressed support for the IMO to undertake a cost benefit analysis prior to any further development. The Chair highlighted that a cost benefit analysis would not be meaningful without first undertaking a detailed design.

Mr Gallagher noted that he had heard concerns from industry with respect to the degree of change required for pipeline arrangements. The Chair noted that the IMO also understood these concerns but the level of change would depend on the hub design that was chosen. The Chair also noted that DBP Transmission currently has services in the Pilbara area that are not greatly utilised. Mr Lauer indicated that this was likely to be due to the high cost of the service. Mr Mark Cooper noted that the service was priced as a single service and that the large distance covered meant that there were parties both advantaged and disadvantaged by this pricing structure.

The Chair requested advice from GAB members on an appropriate timeframe to allow the broader industry to provide feedback on the proposal. GAB members generally considered that a six week period was sufficient. The Chair noted that the IMO could also extend this period if it overlapped with the Electricity Market Review consultation period.

Mr Michael Smythe questioned whether the IMO had received any submissions other than Alinta Energy's submission. The Chair responded that the IMO had not received any other formal submissions.

Mr Gallagher questioned what the IMO proposed to submit to Government. Ms Ryan clarified that the IMO had intended to, if GAB agreed, finalise the high level design and submit it to the Minister with a covering note similar to that circulated in the meeting papers. Mr Lauer reiterated the Chair's previous comment that it would be provided as a recommendation from the Chair of the GAB on behalf of the GAB. The Chair clarified that it was not necessarily a recommendation but rather a piece of advice for Government to consider.

Dr Ray Challen noted that the Electricity Market Review was underway and fuel markets were being considered due to the significant effect on downstream markets. He noted that the review would consider issues and recommendations at a high level rather than in detailed design. Dr Challen also noted the extensive process that the Government would be required to undertake to develop such a policy. Dr Challen advised

	<p>the GAB that members should raise the importance of the introduction of a market with Government before discussing detailed design options further.</p> <p>Mr Di Bona noted that various members of the gas industry had formed an informal working group to assess the opportunity of an industry led solution but noted that this work is still in its formative stages. He noted that he would support the message to the Minister that a new market was needed, however, the industry had not yet formed an opinion with respect to the most appropriate governance structure. The Chair offered the IMO's help to facilitate discussions by the industry working group.</p> <p>The Chair reiterated that the IMO would finalise the broader industry consultation as planned. The Chair noted that the IMO would summarise the industry views to date and those provided in response to the invitation for submission and would provide this to GAB members at the next meeting. Dr Challen also advised industry members to communicate their support for a market to Government and in discussions more broadly.</p> <p>Mr William Pham noted that Santos did not see a need for the development of a new market. Mr Di Bona stated that he did not agree and that others looked forward to a market that was suitable for all industry members to participate in. GAB members again discussed the costs and benefits of the proposal.</p> <p>Dr Kosteki noted that any proposal to Government should clearly articulate the impact on small-use customers. Mr Ian Mumford noted that this proposal was for a wholesale market. Dr Challen suggested that that the benefits could be discussed in terms of the impact on average prices. Mr Smythe noted that because the market was a wholesale spot market, the effect would be largely around risk management and would therefore be very difficult to translate into an impact on household bills.</p> <p>Mr Gallagher queried how much information households had access to, with respect to gas prices. The GAB agreed that the information at this level was limited and a market with transparent prices would be valuable.</p> <p><i>Action Points:</i></p> <ul style="list-style-type: none"> • <i>The IMO to publish an invitation for submissions on the high level market design to be open for a six week period.</i> • <i>The IMO to provide an anonymous summary of views to date to GAB members at the next meeting.</i> 	<p>IMO</p> <p>IMO</p>
<p>8.</p>	<p>GENERAL BUSINESS</p> <p>No general business was raised.</p>	
<p>CLOSED: The Chair declared the meeting closed at 4.00 PM.</p>		

Gas Advisory Board (GAB) - Action Points

Legend:

Unshaded	Unshaded action points are still being progressed.
Shaded	Shaded action points are actions that have been completed
Missing	Action items missing from sequence have been completed from previous meeting and subsequently removed from the log.

#	Year	Action	Responsibility	Meeting arising	Status / progress
51	2014	The IMO to amend the minutes to reflect the agreed changes and publish the final version of minutes taken from GAB Meeting No 15.	IMO	July	Complete.
52	2014	The IMO to provide an overview of the rule change process at the next GAB meeting.	IMO	July	To be discussed in agenda item 5a.
53	2014	The IMO to publish an invitation for submissions on the high level market design to be open for a six week period.	IMO	July	Complete.
54	2014	The IMO to provide an anonymous summary of views to date to GAB members at the next meeting.	IMO	July	To be discussed in agenda item 6.



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Overview of the Rule Change Process

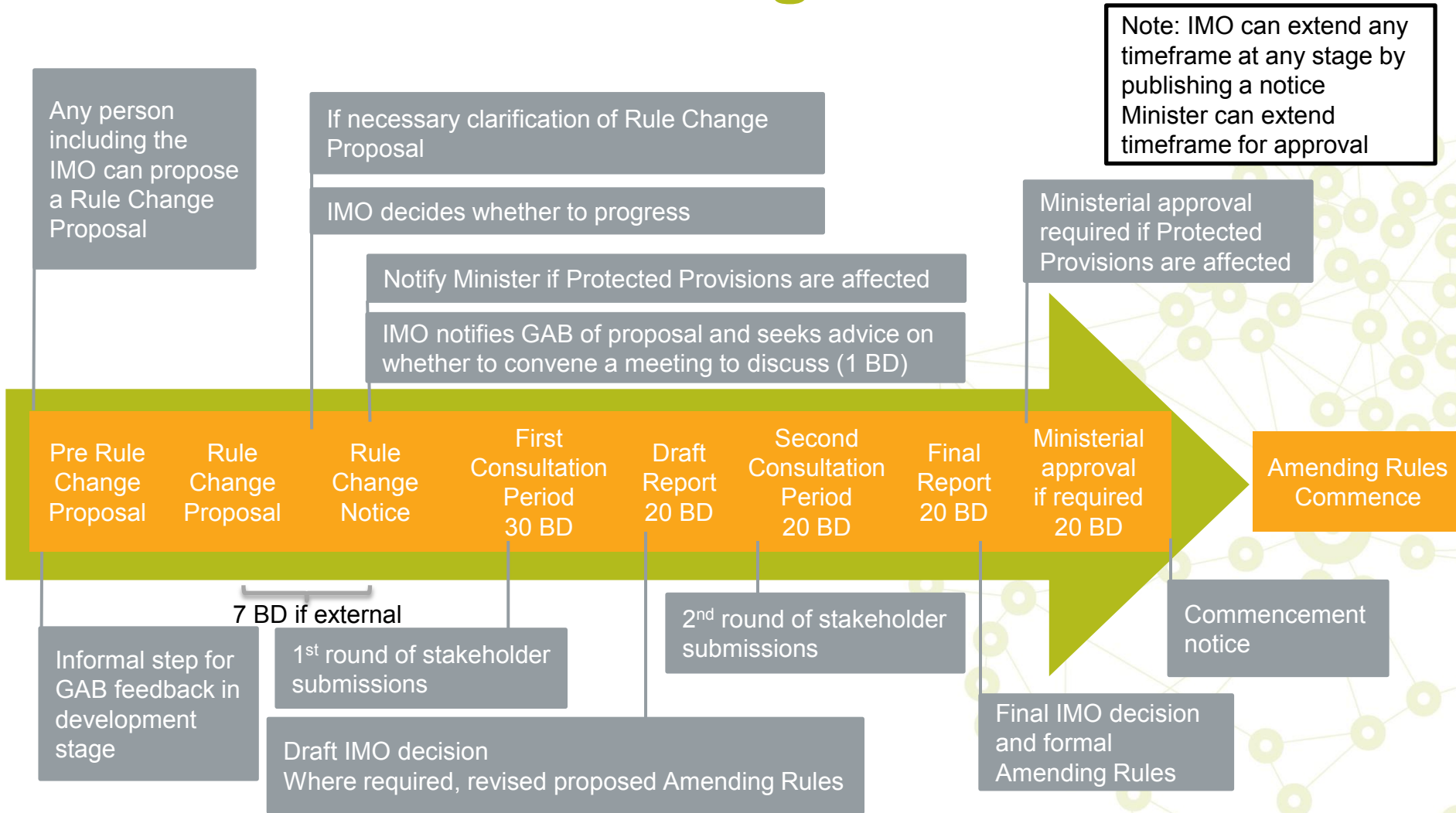
Laura Koziol

Analyst Market Development

14 October 2014



Standard Rule Change Process



Fast Track Rule Change Process

Under subrule 131(2) a Rule Change Proposal can be progressed under the Fast Track Rule Change Process where it is:

- of a minor or procedural nature;
- Required to correct a manifest error; or
- Urgently required and essential for the effective operation of the GBB.

Any person including the IMO can propose a Rule Change Proposal

Notify Minister if Protected Provisions are affected

Informal step for IMO to notify GAB of proposal and seek advice on whether to convene a meeting to discuss (1 BD)

Ministerial approval required if Protected Provisions are affected

Commencement notice

Pre Rule Change Proposal

Rule Change Proposal

Rule Change Notice and Proposal

Consultation
30 BD
15 BD

~~Draft Report~~
20 BD

~~Consultation~~
30 BD

Final Report
20 BD
5 BD

Ministerial approval if required
20 BD

Amending Rules Commence

7 BD if external

Informal step for GAB feedback in development stage

Only round of stakeholder submissions

IMO decision and Amending Rules

Within 5 BD IMO notifies Gas Market Participants expected to have an interest Interested parties may notify the IMO that they wish to be consulted

Note: IMO can only extend the timeframe by 15 BDs Otherwise must reclassify Rule Change Proposal and progress it under the Standard Rule Change Process



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Gas Services Information Procedure Change Proposal

Procedure Change ID: GPC_2014_01

Change requested by:

Name:	Kate Ryan
Phone:	9254 4357
Fax:	9254 4399
Email:	kate.ryan@imowa.com.au
Organisation:	IMO
Address:	Level 17, 197 St Georges Terrace, Perth
Date submitted:	DD Month 2014
Urgency:	2-medium
Procedure change title:	Changes to GSI Procedures to Reflect the Rule Change Proposal: GSI Fee Allocation – Inclusion of Registered Production Facility Operators (GRC_2014_01)
GSI Procedure(s) affected:	GSI Procedure: Registration, Deregistration, Exemptions and Transfer and GSI Procedure: Operation of the Gas Bulletin Board and the Emergency Management Facility

Introduction

Under subrule 156(1) of the Gas Services Information (GSI) Rules the IMO may initiate the Procedure Change Process by developing a Procedure Change Proposal. Gas Market Participants may also notify the IMO where they consider that a change to a GSI Procedure or a new GSI Procedure would be appropriate.

If an Amending Rule requires the IMO to develop new GSI Procedures or to amend or replace existing GSI Procedures, then the IMO is responsible for the development, amendment, or replacement of GSI Procedures so as to comply with the Amending Rule.

GSI Procedures must:

- (a) be developed, amended or replaced in accordance with the process in Part 9 of the GSI Rules;
- (b) be consistent with the GSI Objectives; and
- (c) be consistent with the GSI Rules, the GSI Act and Regulations.

The GSI Objectives are to promote the long term interests of consumers of natural gas in relation to:

- (a) the security, reliability and availability of the supply of natural gas in the State;
- (b) the efficient operation and use of natural gas services in the State;
- (c) the efficient investment in natural gas services in the State; and
- (d) the facilitation of competition in the use of natural gas services in the State.

Details of Procedure Change Requested

1. Provide a reason for the proposed new, amended or replacement GSI Procedure:

Background

The GSI Procedure: Registration, Deregistration, Exemption and Transfer outlines the processes to be followed by Gas Market Participants and the IMO with respect to:

- registration of Gas Market Participants;
- deregistration of Registered Participants;
- registration of Facilities for the Gas Bulletin Board (GBB);
- deregistration and transfer of Registered Facilities; and
- exemptions from registration for Gas Market Participants and Facilities and from providing specific GBB data.

The GSI Procedure: Operation of the Gas Bulletin Board and the Emergency Management Facility outlines the processes to be followed by:

- Registered Participants and the IMO with respect to providing data for the GBB and publishing and archiving data on the GBB; and
- Gas Market Participants, the IMO and the Coordinator of Energy in regard to the operation of the Emergency Management Facility.

Proposed Amendments

The Rule Change Proposal: GSI Fee Arrangements – Inclusion of Registered Production Facility Operators (GRC_2014_01)¹ proposes to allocate GSI Fees between Registered Shippers and Registered Production Facility Operators. The IMO therefore proposes to amend the GSI Procedure: Registration, Deregistration, Exemptions and Transfer and the GSI Procedure: Operation of the Gas Bulletin Board and the Emergency Management Facility to reflect the changes to the GSI Fee allocation methodology and the GSI Fee invoicing process proposed in GRC_2014_01.

It should be noted that this Procedure Change Proposal is dependent on GRC_2014_01 being accepted in the IMO's Final Rule Change Report which is due to be published on 27 November 2014.

GSI Procedure: Registration, Deregistration, Exemptions and Transfer

The IMO proposes to:

- Introduce a new step 3.2.7 to place an obligation on applicants to provide billing contact information when applying for registration of a Production Facility to reflect that the IMO will need this information to invoice Registered Production Facility Operators.
- Amend step 6.3.8 to specify that, in the case of the deregistration of a GBB Production Facility, the IMO may place conditions on the respective Registered Participant to ensure the payment of GSI Fees for periods where the Production Facility was registered.
- Amend step 6.4.8 to expand the IMO's ability to place conditions on the deregistration of a Registered Participant to ensure the payment of GSI Fees for periods where it was a Registered Production Facility Operator. Previously this step only applied to Registered Shippers as the only Gas Market Participants liable to pay GSI Fees.
- Amend step 7.2.7 to specify that in the case of the transfer of a GBB Production Facility the IMO may place conditions on the applicant or the receiving Gas Market Participant to clarify the allocation of GSI Fees during the GSI Invoicing Periods before and following the transfer of the Facility.

GSI Procedure: Operation of the Gas Bulletin Board and the Emergency Management Facility

The IMO proposes to:

- Change the name of section 2.3 from Contact Information to Participant Information and amend steps 2.3.1 and 2.3.3 to place an obligation on all Registered Participants to ensure that the information which is provided for registration purposes but that is not covered under Contact Information as defined under subrule 53(2) of the GSI Rules is kept up-to-date. These amendments will ensure that the IMO has the correct information for each participant at all times, and in particular for billing purposes. The IMO notes that the initial drafting of the GSI Procedure overlooked the requirement for Registered Shippers to maintain their billing information.

¹ Available at: www.imowa.com.au/GRC_2014_01.

- Amend the table in step 2.4.12 to include the obligation on Registered Participants providing Daily Actual Flow Data for a GBB Production Facility to provide corrected Daily Actual Flow Data where the respective Registered Participant becomes aware of a change in the Daily Actual Flow Data previously provided. This amendment reflects the amended definition of the Daily Actual Flow Data in Schedule 1 of the GSI Rules proposed in GRC_2014_01.
- Amend the table in step 4.3.5 to place the obligation on the IMO to update the GBB report 'Actual Flows' as soon as practical if corrected data for a GBB Production Facility is received.
- Update the time formats throughout the GSI Procedure to be consistent with the GSI Rules.

The IMO has also taken the opportunity to correct some minor typographical errors and formatting in both GSI Procedures.

The IMO proposes to amend the GBB Production Facility Registration Form and GBB Facility Transfer Form to require the provision of billing contact information and clarify obligations with respect to GSI Invoices for Registered Production Facility Operators.

It should be noted that, prior to the commencement of the Amending Rules, the IMO will issue a request for the initial billing contact information for all Registered Production Facility Operators in accordance with regulation 13 of the GSI Regulations.

Call for submissions

The IMO is seeking submissions regarding this proposal. The submission period is 20 Business Days from the publication of this Procedure Change Proposal. Submissions must be delivered to the IMO by **5:00 PM on [DD Month 2014]**.

The IMO prefers to receive submissions by email to market.development@imowa.com.au using the submission form available at: www.imowa.com.au/gsideveloping-procedures.

Submissions may also be sent to the IMO by post or fax, addressed to:

Independent Market Operator

Attn: Group Manager, Development and Capacity
PO Box 7096
Cloisters Square, Perth, WA 6850

Fax: (08) 9254 4399

2. Provide the wording of the amended GSI Procedure:

The proposed amended GSI Procedures are provided as attachments to this Procedure Change Proposal.

3. Describe how the proposed changes to the GSI Procedure would be consistent with the GSI Rules, the GSI Act and Regulations:

The proposed amended GSI Procedures have been reviewed as a whole by the IMO to ensure compliance with the relevant provisions in the:

- GSI Rules;
- GSI Act; and
- GSI Regulations.

4. Describe how the proposed changes to the GSI Procedure would be consistent with the GSI Objectives:

The steps described in the proposed amended GSI Procedures facilitate the allocation and invoicing of GSI Fees as described in the amendments to rules 114 to 120 and Schedule 1 of the GSI Rules proposed in GRC_2014_01.

The IMO considers that the proposed changes to the GSI Procedures are drafted in a way that does not change the operation or objectives of the GSI Rules. As a result, the IMO considers that the proposed amended GSI Procedures are consistent with the GSI Objectives.



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Gas Services Information Procedure: Registration, Deregistration, Exemptions and Transfer

VERSION **2**

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GAS SERVICES INFORMATION ACT 2012
GAS SERVICES INFORMATION
REGULATIONS 2012
GAS SERVICES INFORMATION RULES
COMMENCEMENT:

This Gas Services Information Procedure takes effect from 8:00am (WST) on the same date as the Gas Services Information Rules.

VERSION HISTORY

Version	Effective Date	Notes
1	GSI Rules Commencement	GSI Procedure: Registration, Deregistration, Exemptions and Transfer
<u>2</u>	<u>DD Month 2014</u>	<u>Amendments to GSI Procedure resulting from GPC 2014 01</u>

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GSI Procedure:

Registration, Deregistration, Exemptions and Transfer [Version 2](#)

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1 PROCEDURE OVERVIEW

1.1 Relationship with the Gas Services Information Rules

1.1.1 This Gas Services Information (GSI) Procedure: Registration, Deregistration, Exemptions and Transfer (Procedure) should be read in conjunction with Part 2 of the Gas Services Information Rules (GSI Rules).

1.1.2 Reference to particular GSI Rules or subrules within the Procedure in bold and square brackets [rule XX] or [subrule XX(X)] are current as of **DD Month 2014**. These references are included for convenience only and are not part of this Procedure.

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1.2 Purpose of this Procedure

1.2.1 This Procedure outlines the process of:

- (a) participant registration and deregistration;
- (b) Facility registration, deregistration and transfer;
- (c) exemption from providing Nominated and Forecast Flow Data, Daily Actual Flow Data and Daily Actual Consumption Data; and
- (d) Exemption from registration.

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1.3 Associated Documents

1.3.1 The IMO must publish and maintain the following application forms on the GSI Website:

- (a) Facility Deregistration Application Form;
- (b) Facility Exemption Application Forms for each type of Gas Bulletin Board Facility (GBB Facility);
- (c) Facility Registration Application Forms for each type of GBB Facility;
- (d) Facility Transfer Application Form;
- (e) GBB Data Provision Exemption Form;
- (f) Participant Deregistration Application Form; and
- (g) Participant Registration Application Form.

1.4 Application of this Procedure

1.4.1 This Procedure applies to the IMO and Gas Market Participants.

1.5 Terminology and Definitions

1.5.1 A word or phrase defined in the GSI Act, the GSI Regulations or the GSI Rules has the same meaning when used in this Procedure. In addition the following defined terms have the meaning given:

Term	Definition
Applicant	An entity or person applying for Gas Market Participant registration, deregistration, Facility registration, deregistration and transfer, or exemption from registering a Facility and/or from providing certain GBB data. This includes a person nominated by the owner, controller or operator of a Facility under subrule 26(1) or 41(1), where

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Term	Definition
	applicable.
Deregistration Application	An application for deregistration as a Registered Participant (in the category of Registered Facility Operator and/or Registered Shipper), and an application for deregistration of a Registered Facility.
Facility Deregistration Application Form	The form published by the IMO on the GSI Website that may be completed by a Registered Facility Operator to apply for deregistration of a Registered Facility.
Facility Exemption Application Form	The applicable form published by the IMO on the GSI Website that must be completed by a Gas Market Participant to apply for an Exemption from registration for a Facility, including: <ul style="list-style-type: none"> • GBB Pipeline Registration Exemption Form; • GBB Storage Facility Registration Exemption Form; • GBB Production Facility Registration Exemption Form; and • GBB Large User Facility Registration Exemption Form.
Facility Registration Application Form	The applicable form published by the IMO on the GSI Website that must be completed by an Applicant in relation to the registration of a Facility, including: <ul style="list-style-type: none"> • GBB Pipeline Registration Form; • GBB Storage Facility Registration Form; • GBB Production Facility Registration Form; and • GBB Large User Facility Registration Form.
Facility Transfer Application Form	The form published by the IMO on the GSI Website that must be completed by a Registered Facility Operator to transfer a Registered Facility to a new operator.
GBB Data Provision Exemption Form	The form published by the IMO on the GSI Website that must be completed by a Registered Storage Facility Operator, Registered Production Facility Operator or Registered Large User to apply for an exemption from providing Nominated and Forecast Flow Data, Daily Actual Flow Data and/or Daily Actual Consumption Data (as applicable).
Participant Deregistration Application Form	The form published by the IMO on the GSI Website that may be completed by a Registered Participant to apply for deregistration as either a Registered Facility Operator and/or Registered Shipper.
Participant Registration Application Form	The form published by the IMO on the GSI Website that must be completed by a Gas Market Participant that is required to be a Registered Participant.
Transfer Application	An application for transfer of a Registered Facility from one Registered Participant to another Registered Participant.

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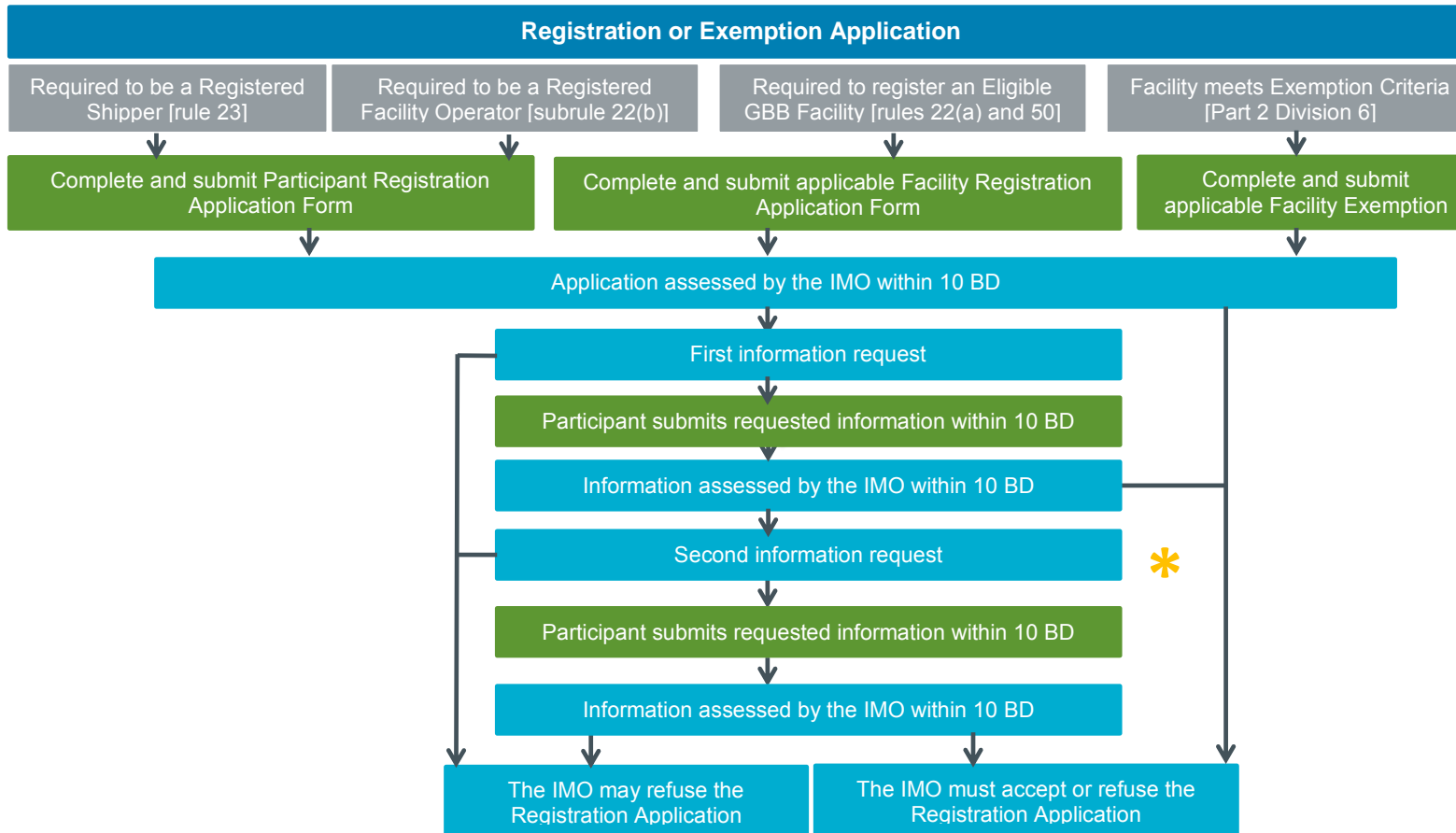
1.6 GSI Register

- 1.6.1 The IMO must publish and maintain on the GSI Website an up to date GSI Register.
[rule 51]
- 1.6.2 The IMO must include the following information on the GSI Register:
- (a) the name of each Registered Participant, including whether the Gas Market Participant is registered as a Registered Facility Operator, a Registered Shipper, or both;
 - (b) the name of each Registered Facility, the type of Facility (GBB Pipeline, GBB Storage Facility, GBB Production Facility or GBB Large User Facility) and the Registered Participant that is registered as the operator of the Facility; and
 - (c) the name of each Facility that is the subject of an Exemption from registration, and the type of Facility (Transmission Pipeline, Storage Facility, Production Facility or Large User Facility).
- 1.6.3 The IMO must amend the GSI Register in response to a decision on an application, and the IMO must do so within the time frame allowed under the applicable rule for the notification of the decision.

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2 REGISTRATION PROCESS

Flowchart Legend



* Decision-making for transfer and deregistration only involves one information request. All other processes remain the same.

3 REGISTRATION

3.1 Registering as a Participant

- 3.1.1 A Gas Market Participant that is required to register under rules 22 and/or 23 must submit a Registration Application to become a Registered Participant in one or more of the following categories:
- (a) Registered Facility Operator; and/or
 - (b) Registered Shipper.
- 3.1.2 An Applicant must fill the Participant Registration Application Form provided on the GSI Website and submit this to the IMO by email or post to the address specified on the form.
- 3.1.3 An Applicant must provide the information requested in the Participant Registration Application Form, including Contact Information, as set out in subrule 53(3). The Contact Information must include contact details for the Gas Market Participant (company), a primary contact person, an administrative user and may include details for alternate contact(s).
- 3.1.4 An Applicant that is required to register as a Registered Shipper must also provide the billing contact information specified in the Participant Registration Application Form.

3.2 Registering a Facility

- 3.2.1 A Gas Market Participant that owns, controls or operates an Eligible GBB Facility, must submit a Registration Application in relation to the Facility.
- 3.2.2 In accordance with subrule 26(1), the owner, controller or operator of a Facility that is required to be registered, may nominate a person to be the Applicant in relation to the registration of the Facility.
- 3.2.3 The nominated Applicant must be a party that is capable of fulfilling the obligations under the GSI Rules in relation to the provision of data for the GBB and will generally be the operator of the Facility.
- 3.2.4 An Applicant must submit a Facility Registration Application Form for each Facility that it operates, unless the Applicant has submitted a Facility Exemption Application Form or the Facility has been granted an Exemption.
- 3.2.5 If an Applicant considers that an Eligible GBB Facility meets the applicable Exemption Criteria, then the Applicant may submit an Exemption Application in respect of that facility under Section 8 of this Procedure.
- 3.2.6 Where the Applicant is not a Registered Participant, it must submit a Participant Registration Application Form at the same time as a Facility Registration Application Form.
- 3.2.7 Where the Applicant is applying for GBB registration of a Production Facility, it must provide the billing contact information specified in the Production Facility Application Form.
- 3.2.8 An Applicant must include the applicable Standing Data in each Facility Registration Application Form. Further details on Standing Data to be included in respect of each type of GBB Facility are set out in Section 4 of this Procedure.
- 3.2.9 Where an Applicant has been nominated by the owner, controller or operator (as applicable) of the Facility, the Applicant must include in the Facility Registration Application Form information to demonstrate that each owner, controller or operator

(as applicable) of the Facility consents to the Applicant submitting a Registration Application in relation to that Facility.

3.3 The IMO's Registration Process

- 3.3.1 Once a Registration Application is received by the IMO, the IMO must assess whether the application is sufficient for registration in the applicable category.
- 3.3.2 Where the IMO assesses that further information is required, the IMO must make a first information request within 10 Business Days of the receipt of the Registration Application. The first information request must give the Applicant 10 Business Days (the relevant date in subrule 28(4)(b)) to provide the requested information. Deleted: a
- 3.3.3 The Applicant must provide the requested information to the first information request by the relevant date.
- 3.3.4 If the Applicant does not respond to the first information request by the relevant date, the IMO may refuse the Registration Application.
- 3.3.5 On the first information request closing date, if the IMO has received the information requested and has assessed that further information is required, it may make a second information request within 10 Business Days of the first information request closing date. The second information request must give the Applicant 10 Business Days (the relevant date in subrule 58(4)(c)) to provide the requested information. Deleted: applicant
- 3.3.6 The Applicant must provide the requested information to the second information request by the relevant date.
- 3.3.7 If the Applicant does not respond to the second information request by the relevant date, the IMO may refuse the Registration Application.
- 3.3.8 The IMO may clarify the information requested in either the first or second information request and, if the IMO considers it appropriate, may re-set the relevant date for the request.
- 3.3.9 When the IMO assesses that no more supporting information is required, the IMO must, within 10 Business Days (the relevant date in subrule 28(4)), decide to:
- (a) accept the Registration Application; or
 - (b) refuse the Registration Application.
- 3.3.10 Where the IMO accepts a Registration Application, it must do the following by the relevant date:
- (a) notify the Applicant and the owner, controller or operator of the Facility (as applicable) by email or post that its application has been accepted and specify the Gas Day on which registration takes effect;
 - (b) advise the Applicant of the Receipt Points, Delivery Points or Gate Stations (as applicable) for which data is required to be submitted for the GBB;
 - (c) amend the GSI Register to record the registration; and
 - (d) publish a notice of the change to the GSI Register on the GSI Website.
- 3.3.11 Where the IMO accepts a Registration Application in relation to the operator of a Facility, the IMO must register the person as a Registered Facility Operator at least two Business Days before the Gas Day on which the registration takes effect.
- 3.3.12 Where the IMO accepts a Registration Application in relation to a Shipper, the IMO must register the person as a Registered Shipper at least one Business Day before the Gas Day on which the registration takes effect. Deleted: the

- 3.3.13 Where the IMO accepts a Registration Application in relation to a Facility, the IMO must register the Facility as a Registered Facility at least two Business Days before the Gas Day in relation on which the registration takes effect.
- 3.3.14 Other than in relation to an application for registration of multiple Transmission Pipelines under rule 32, the IMO may only refuse a Registration Application in any one or more of the circumstances set out in subrule 28(3).
- 3.3.15 Where the IMO refuses a Registration Application for any of the reasons in subrule 28(3), the IMO must notify the Applicant, and the owner, controller or operator (as applicable) by email or post, that its application has been refused and give reasons for refusal, by the relevant date in subrule 28(4).
- 3.3.16 Where the IMO refuses the application because of insufficient information provided in the Registration Application within the specified timeframes, the Gas Market Participant must reapply for registration in the appropriate category and must provide the required information.

3.4 Application for registration of multiple Transmission Pipelines

- 3.4.1 Where an Applicant operates more than one Transmission Pipeline, it may apply to register multiple Transmission Pipelines as a single GBB Pipeline. **[rule 32]**
- 3.4.2 An Applicant that wishes to register multiple Transmission Pipelines (the relevant pipelines) as a single GBB Pipeline must provide, in the Facility Registration Application Form, information that demonstrates each of the requirements in subrule 32(3).
- 3.4.3 The IMO must not register the relevant pipelines as a single GBB Pipeline unless:
 - (a) each of the requirements of subrule 32(3) have been demonstrated to the reasonable satisfaction of the IMO;
 - (b) the IMO is satisfied that registration of the pipelines as a single GBB Pipeline is consistent with the objectives and primary purpose of the GBB set out in the GSI Act; and
 - (c) the IMO is satisfied that registration of the pipelines as a single GBB Pipeline can be accommodated within the existing GBB system and software.
- 3.4.4 Where the IMO refuses an application for registration of multiple Transmission Pipelines, the Applicant must complete a separate Facility Registration Application Form for each Transmission Pipeline and submit these forms to the IMO.

4 STANDING DATA IN RESPECT OF A FACILITY

4.1 Transmission Pipeline Standing Data

- 4.1.1 The Applicant must provide the following Standing Data in the applicable Facility Registration Application Form in relation to a Transmission Pipeline that is required to be registered **[subrule 25(2)]**:
 - (a) details of all physical receipt points and physical delivery points on the pipeline, and the Production Facilities, and Storage Facilities and other Transmission Pipelines to which they connect **[subrule 54(1)(a)]**;
 - (b) details of any notional receipt points and notional delivery points used by the operator (i.e. for nominations), including all corresponding physical delivery points or receipt points **[subrule 54(1)(b)]**;
 - (c) a list of all Shippers on the Pipeline **[subrule 54(1)(c)]**;

- (d) a list of all physical delivery points that serve Distribution Systems (if any), including identifying those delivery points that serve Distribution Systems where more than one retailer can sell gas in accordance with an approved Retail Market Scheme under the *Energy Coordination Act 1994* **[subrule 54(1)(d)]**;
 - (e) the Nameplate capacity of the pipeline;
 - (f) if the pipeline is a PIA Pipeline, the physical delivery point in relation to which Gas Specification Data must be provided **[subrule 61(1)]**; and
 - (g) the applicable EMF Information for the pipeline.
- 4.1.2 Where the IMO accepts a Registration Application in relation to a Transmission Pipeline, it must determine, from the information provided under steps 4.1.1(a),(b) and (d), the:
- (a) Delivery Points and Receipt Points for the GBB Pipeline; and
 - (b) Gate Stations (as applicable) for the GBB Pipeline.
- 4.1.3 The IMO must advise the Applicant of the applicable Delivery Points, Receipt Points and Gate Stations in the notice under step 3.3.10(b).
- 4.1.4 Where the IMO advises the operator of a GBB Pipeline that it must provide information in relation to one or more Gate Stations, the operator of the GBB Pipeline must, by no later than 8:00 AM on the Gas Day on which the operator must start submitting data to the GBB in relation to the GBB Pipeline, provide to the IMO the Nameplate Capacity of each Gate Station.

4.2 Storage Facility Standing Data

- 4.2.1 The Applicant must provide the following Standing Data in the applicable Facility Registration Application Form in relation to a Storage Facility that is required to be registered **[subrule 25(2)]**:
- (a) the GBB Pipeline(s) to which the Storage Facility is connected and the physical Delivery Point(s) and Receipt Point(s) at which the facility is connected **[subrule 62(1)]**;
 - (b) the Production Nameplate Capacity of the Storage Facility;
 - (c) the Refill Nameplate Capacity of the Storage Facility;
 - (d) the Storage Nameplate Capacity of the Storage Facility; and
 - (e) the applicable EMF Information for the Storage Facility.
- 4.2.2 Where the IMO accepts a Registration Application in relation to a Storage Facility, it must determine, from the information provided under steps 4.1.1(a) and (b), the Delivery Point(s) and Receipt Point(s) for the Storage Facility.
- 4.2.3 The IMO must advise the Applicant of the applicable Delivery Point(s) and Receipt Point(s) in the notice under step 3.3.10(b).

4.3 Production Facility Standing Data

- 4.3.1 The Applicant must provide the following Standing Data in the applicable Facility Registration Application Form in relation to a Production Facility that is required to be registered **[subrule 25(2)]**:
- (a) the Transmission Pipeline(s) to which the Production Facility is connected and the physical Receipt Point(s) at which the facility is connected **[subrule 69(1)]**;

- (b) the Nameplate Capacity of the Production Facility;
- (c) if the facility is a PIA Production Facility, the PIA Summary Information **[subrule 74(1)]**; and
- (d) the applicable EMF Information for the Production Facility.

4.3.2 Where the IMO accepts a Registration Application in relation to a Production Facility, it must determine, from the information provided under steps 4.1.1(a) and (b), the Receipt Point(s) for the Production Facility.

4.3.3 The IMO must advise the Applicant of the applicable Receipt Point(s) in the notice under step 3.3.10(b).

4.4 Large User Facility Standing Data

4.4.1 The Applicant must provide the following Standing Data in the applicable Facility Registration Application Form in relation to a Large User Facility that is required to be registered **[subrule 25(2)]**:

- (a) either:
 - i. the Transmission Pipeline(s) to which the Large User Facility is connected and the physical delivery point(s) at which the facility is connected **[subrule 76(1)(a)]**; or
 - ii. If the Large User Facility is connected to a Distribution System, the Transmission Pipeline(s) that the Distribution System is connected to and the physical delivery point(s) at which the Distribution System is connected to one or more Transmission Pipelines as applicable, **[subrule 76(1)(a)]**;

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- (b) the Consumption Category that best describes the predominant use of gas at the Large User Facility **[subrule 76(1)(b)]**;
- (c) the Nameplate Capacity of Facility of the Large User Facility; and
- (d) the applicable EMF Information for the Large User Facility.

4.4.2 Where the IMO accepts a Registration Application in relation to a Large User Facility, it must determine, from the information provided under steps 4.1.1(a) and (b), the Delivery Point(s) for the Large User Facility.

4.4.3 The IMO must advise the Applicant of the applicable Delivery Point(s) in the notice under step 3.3.10(b).

5 DECLARATION OF ELIGIBLE GBB FACILITY

5.1 Declaration of an Eligible GBB Facility

5.1.1 The IMO may declare a Facility to be an Eligible GBB Facility where the IMO has reasonable grounds to believe that a facility that is not currently registered or subject to an Exemption from registration, meets the requirements to be registered. **[rule 50]**

5.1.2 If the IMO declares a Facility to be an Eligible GBB Facility, it must do so by sending, by email or post, a notice to the owner, controller and/or operator of the facility, detailing the IMO's reasons for sending the notice, and a date by which the Gas Market Participant must respond to the notice. The date must be no earlier than 20 Business Days from the date of issuing the notice.

5.1.3 When a Gas Market Participant receives a notice declaring a Facility to be an Eligible GBB Facility, it must, by the date specified in the notice:

- (a) if applicable, nominate a person under subrule 26(1) or 42(1) to be the Applicant in relation to the Facility; and
- (b) either:
 - i. apply for registration of the Facility; or
 - ii. apply for an Exemption in relation to the Facility (if an Exemption Application has not been made in relation to the facility within the previous 12 months, and the operator reasonably believes that the facility is eligible for an Exemption).

5.1.4 If a Gas Market Participant receives a notice declaring a Facility to be an Eligible GBB Facility and the Gas Market Participant has reasonable grounds to believe the notice should not have been issued, the Gas Market Participant must, by the date specified in the notice:

- (a) notify the IMO by email or post; and
- (b) in that notice, provide the IMO with information demonstrating that the notice declaring the Facility to be an Eligible GBB Facility should not have been issued.

5.1.5 The IMO may cancel a notice declaring a Facility to be an Eligible GBB Facility at any time prior to the date specified in the notice where the notice was issued as a result of a mistake or incorrect information. The IMO may do so of its own volition or in response to information provided under step 5.1.4.

6 DEREGISTRATION

6.1 Facility Deregistration

6.1.1 Where a Registered Facility Operator considers that a Registered Facility that it operates no longer satisfies the requirements of registration, the Registered Facility Operator must complete the Facility Deregistration Application Form available on the GSI Website and submit it to the IMO by email or post to the address specified on the form.

6.1.2 The circumstances that may qualify a Registered Facility for deregistration are that either the Facility:

- (a) has been decommissioned;
- (b) is no longer operating; or
- (c) becomes eligible for Exemption from registration (e.g. because the relevant Nameplate Capacity of the Facility is reduced to below 10TJ/day on an ongoing basis).

6.2 Participant Deregistration

6.2.1 A Registered Participant may only apply for deregistration where it satisfies at least one of the following **[subrule 35(1)]**:

- (a) the Gas Market Participant is a Registered Shipper that no longer meets the requirements of a Shipper and does not operate a Registered Facility or an Eligible GBB Facility; or
- (b) the Gas Market Participant is a Registered Facility Operator that no longer operates a Registered Facility or an Eligible GBB Facility, and is not required to be registered in any other category (Registered Shipper).

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6.2.2 A Registered Participant (Registered Shipper or Registered Facility Operator) wishing to be deregistered must complete the Participant Deregistration Application Form

available on the GSI Website and submit it to the IMO by email or post to the address specified on the form.

6.3 The IMO's Facility Deregistration Process

- 6.3.1 Once a Facility Deregistration Application Form is received by the IMO, the IMO must assess whether the application is sufficient for deregistration of the Registered Facility.
- 6.3.2 Where the IMO assesses that further information is required, the IMO may make an information request within 10 Business Days of the receipt of the application form. This request must give the Applicant 10 Business Days (the relevant date in subrule 34(6)(b)) to provide the requested information.
- 6.3.3 The Applicant must provide the requested information by the relevant date.
- 6.3.4 If the Applicant does not respond to the information request by the relevant date, the IMO may refuse the Deregistration Application.
- 6.3.5 The IMO may clarify the information requested in the information request and, if the IMO considers it appropriate, may re-set the relevant date for the request.
- 6.3.6 If the IMO assesses that no more supporting information is required, the IMO must, within 10 Business Days (the relevant date as defined in subrule 34(6)), decide to:
- (a) accept the Deregistration Application; or
 - (b) refuse the Deregistration Application.
- 6.3.7 If the IMO decides to accept the Deregistration Application, the IMO must consider whether any conditions should be placed on the deregistering Facility and determine the Gas Day on which the deregistration takes effect, which may be different to the day nominated in the Deregistration Application.
- 6.3.8 The IMO may place conditions on the deregistration that require the Applicant to continue to comply with specified obligations on or after the Gas Day on which the deregistration takes effect (e.g. continue to provide Daily Actual Flow Data in relation to Gas Days up to the Gas Day before the deregistration takes effect or, in the case of the deregistration of a GBB Production Facility, to pay any GSI Invoices relating to GSI Invoice Periods including Gas Days up to the Gas Day on which the deregistration takes effect).
- 6.3.9 The IMO must also, by the relevant date:
- (a) notify the Applicant by email or post that its application has been accepted and specify the Gas Day on which deregistration takes effect;
 - (b) where the effective Gas Day for deregistration is different from that nominated by the Applicant, provide reasons for the difference;
 - (c) notify the Applicant of any conditions on the deregistration;
 - (d) amend the GSI Register to record the deregistration; and
 - (e) publish a notice of the change to the GSI Register on the GSI Website.
- 6.3.10 Where the IMO accepts a Facility Deregistration Application, the IMO must notify the Applicant at least one Business Day before the Gas Day D on which deregistration takes effect. The Registered Facility Operator in respect of that Facility is required to fulfil its obligations under the GSI Rules up to and including Gas Day D-1, and comply with any conditions imposed on the deregistration on and from Gas Day D.

- 6.3.11 Where the IMO refuses a Deregistration Application for a Facility, the IMO must notify the Applicant by email or post that its application has been refused and give reasons for the refusal by the relevant date as defined in subrule 34(6).
- 6.3.12 Where the IMO refuses a Deregistration Application for a Facility due to insufficient information in either the Facility Deregistration Application Form or in response to a request for more information under step 6.3.2, and the Registered Facility Operator considers that it continues to satisfy the requirements for deregistration, the Registered Facility Operator may submit a new Deregistration Application under step 6.3 with the required information.
- 6.3.13 Where the IMO is satisfied that a Registered Facility is no longer required to be registered (for example, because the Transmission Pipeline to which the Facility is connected has been deregistered) and it has not received a Facility Deregistration Application Form, then the IMO may initiate the process of deregistration. **[rule 37]**
- 6.3.14 If the IMO decides to deregister a Facility of its own volition, the IMO must notify the Registered Facility Operator by email or post of its decision, including the reasons for deregistration, the Gas Day on which the deregistration takes effect and the date by which the Registered Facility Operator must respond to the notification.
- 6.3.15 Where the IMO sends a notification of deregistration under step 6.3.14 and the Registered Facility Operator disputes it, the IMO must cancel its notification by email or post, until the dispute is resolved.
- 6.3.16 Where the IMO sends a notification of deregistration under step 6.3.14 and does not receive a response or receives an acceptance from the Registered Facility Operator by the closing date for a response, the IMO must proceed with deregistering the Facility in accordance with step 6.3.18.
- 6.3.17 The IMO may place conditions on the deregistration that require the operator of the facility to continue to comply with specified obligations on or after the Gas Day on which the deregistration takes effect.
- 6.3.18 The IMO must, at least one Business Day before the Gas Day on which the deregistration is to take effect:
- (a) notify the Registered Facility Operator by email or post of its decision including the Gas Day on which deregistration takes effect;
 - (b) notify the Registered Facility Operator of any conditions in relation to the deregistration of the Facility;
 - (c) amend the GSI Register to record the deregistration; and
 - (d) publish a notice of the change to the GSI Register on the GSI Website.

6.4 The IMO's Participant Deregistration Process

- 6.4.1 Once a Participant Deregistration Application Form is received by the IMO, the IMO must assess whether the application is sufficient for deregistration of the Registered Participant.
- 6.4.2 Where the IMO assesses that further information is required, the IMO may make an information request within 10 Business Days of the receipt of the application form. This request must give the Applicant 10 Business Days (the relevant date in subrule 36(6)(b)) to provide the requested information.
- 6.4.3 The Applicant must provide the requested information by the relevant date.
- 6.4.4 If the Applicant does not respond to the information request by the relevant date, the IMO may refuse the Deregistration Application.

- 6.4.5 The IMO may clarify the information requested in the information request and, if the IMO considers it appropriate, may re-set the relevant date for the request.
- 6.4.6 If the IMO assesses that no more supporting information is required, the IMO must, within 10 Business Days (the relevant date as defined in subrule 36(6)), decide to:
- accept the Deregistration Application; or
 - refuse the Deregistration Application.
- 6.4.7 If the IMO decides to accept the Deregistration Application, the IMO must consider whether any conditions should be placed on the deregistering Participant and determine the Gas Day on which the deregistration takes effect, which may be different to the day nominated in the Deregistration Application.
- 6.4.8 The IMO may place conditions on the deregistration of a Registered Participant that require the Gas Market Participant to continue to comply with specified obligations on or after the Gas Day on which the deregistration takes effect (e.g. to pay any GSI Invoices relating to Invoice Periods including Gas Days up to the Gas Day on which the deregistration takes effect).
- 6.4.9 The IMO must also, by the relevant date:
- notify the Applicant by email or post that its application has been accepted and specify the Gas Day on which deregistration takes effect;
 - where the effective Gas Day for deregistration is different from that nominated by the Applicant, provide reasons for the difference;
 - notify the Applicant of any conditions on the deregistration;
 - amend the GSI Register to record the deregistration; and
 - publish a notice of the change to the GSI Register on the GSI Website.
- 6.4.10 Where the IMO accepts a Participant Deregistration Application, the IMO must notify the Applicant at least one Business Day before the Gas Day D on which deregistration takes effect. The Registered Participant is required to fulfil its obligations under the GSI Rules up to and including Gas Day D-1, and comply with any conditions imposed on the deregistration on and from Gas Day D.
- 6.4.11 Where the IMO refuses a Deregistration Application for a Registered Participant, the IMO must notify the Applicant by email or post that its application has been refused and give reasons for the refusal by the relevant date in subrule 36(6).
- 6.4.12 Where the IMO refuses a Deregistration Application for a Registered Participant due to insufficient information in either the Participant Deregistration Application Form or in response to a request for more information under step 6.4.2, and the Registered Participant considers that it continues to satisfy the requirements for deregistration, the Registered Participant may submit a new Deregistration Application under step 6.4 with the required information.
- 6.4.13 Where the IMO is satisfied that a Registered Participant (Registered Facility Operator or Registered Shipper) is no longer required to be registered and it has not received a Participant Deregistration Application Form, then the IMO may initiate the process of deregistration. **[rule 37]**
- 6.4.14 If the IMO decides to deregister a Participant of its own volition, the IMO must notify the Registered Participant by email or post of its decision, including:
- the reasons for deregistration;
 - the Gas Day on which the deregistration takes effect; and

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- (c) the date (prior to the Gas Day under (b) above) by which the Registered Participant must respond to the notification.
- 6.4.15 Where the IMO sends a notification of deregistration under step 6.4.14 and the Registered Participant disputes it, the IMO must cancel its notification by email or post until the dispute is resolved.
- 6.4.16 Where the IMO sends a notification of deregistration under step 6.4.14 and does not receive a response or receives an acceptance from the Registered Participant by the closing date for a response, the IMO must proceed with deregistering the Participant in accordance with step 6.4.17.
- 6.4.17 The IMO must, at least one Business Day before the Gas Day on which the deregistration is to take effect:
- (a) notify the Registered Participant by email or post of its decision including the Gas Day on which deregistration takes effect;
 - (b) notify the Applicant of any conditions on the deregistration;
 - (c) amend the GSI Register to record the deregistration; and
 - (d) publish a notice of the change to the GSI Register on the GSI Website.

7 FACILITY TRANSFER

7.1 Facility Transfer

- 7.1.1 A Registered Facility Operator transferring a Registered Facility to another Gas Market Participant must submit a Facility Transfer Application Form to the IMO by email or post to the address specified on the form.
- 7.1.2 A Gas Market Participant receiving a transferred Facility must be a Registered Facility Operator in accordance with the Rules and this Procedure, on or before the effective date of the Facility transfer.
- 7.1.3 If the Gas Market Participant receiving the transferred Facility is not a Registered Facility Operator, it must register in accordance with Section 3 of this Procedure.
- 7.1.4 The Gas Market Participant receiving the transferred Facility must be a signatory to the Transfer Application submitted to the IMO.

7.2 The IMO's Facility Transfer Process

- 7.2.1 Once a Transfer Application is received by the IMO, the IMO must assess whether the information contained in the application is sufficient for transfer of the Registered Facility.
- 7.2.2 Where the IMO assesses that further information is required, the IMO may make a request for further information within 10 Business Days of the receipt of the Facility Transfer Application Form. This request must give the Applicant 10 Business Days (the relevant date in subrule 39(6)(b)) to provide the requested information.
- 7.2.3 The Applicant must provide the requested information by the relevant date.
- 7.2.4 If the Applicant does not respond to the information request by the relevant date, the IMO may refuse the Transfer Application.
- 7.2.5 The IMO may clarify the information requested in the information request and, if the IMO considers it appropriate, may re-set the relevant date for the request.
- 7.2.6 When the IMO assesses that no more supporting information is required, the IMO must, within 10 Business Days (the relevant date as defined in subrule 39(6)), decide to:

- (a) accept the application; or
 - (b) refuse the application.
- 7.2.7 The IMO may place conditions on the transfer of a Registered Facility that require the Applicant and/or the Gas Market Participant receiving the transferred Facility to comply with specified obligations prior to, on, or after the Gas Day on which the transfer takes effect (e.g. to clarify which operator is required to provide GBB data prior to and following the transfer or, in the case of the transfer of a GBB Production Facility, to clarify the allocation of GSI Fees relating to GSI Invoice Periods prior to and following the transfer).
- 7.2.8 If the IMO decides to accept a Transfer Application, it must do the following by the relevant date:
- (a) notify both the Applicant and the Gas Market Participant receiving the transferred Facility by email or post that the application has been accepted and specify the Gas Day on which the transfer takes effect;
 - (b) notify the Applicant and the Gas Market Participant receiving the transferred Facility of any conditions on the transfer;
 - (c) amend the GSI Register to record the transfer; and
 - (d) publish a notice of the change to the GSI Register on the GSI Website.
- 7.2.9 Where the IMO accepts the Transfer Application, it must do so at least two Business Days before the Gas Day D on which the transfer takes effect. Subject to any conditions placed by the IMO on the transfer, the Applicant must fulfil all obligations under the GSI Rules in relation to the Facility up to and including Gas Day D-1, while the Gas Market Participant receiving the transferred Facility must start fulfilling its obligations from Gas Day D.
- 7.2.10 Where the IMO refuses a Transfer Application it must notify both the Applicant and the Gas Market Participant receiving the transferred Facility by email or post that the Transfer Application has been refused and give reasons for refusal, by the relevant date in subrule 39(6).
- 7.2.11 Where the IMO refuses a Transfer Application due to insufficient information in the Facility Transfer Application Form or in response to a request for more information under step 7.2.2, and the Registered Facility Operator considers that the Facility continues to satisfy the requirements for transfer, the Registered Facility Operator may submit a new Transfer Application under step 7.2 with the required information.

8 EXEMPTION OF FACILITIES FROM REGISTRATION

8.1 Facility Exemption

- 8.1.1 An owner, controller or operator of a GBB Facility that is required to be registered under rule 22 or is declared an Eligible GBB Facility under rule 50 (provided the Facility was not the subject of an Exemption Application within the previous 12 months) may apply for Exemption from registration for the relevant Facility. **[subrule 41(1)]**
- 8.1.2 The Applicant must complete the applicable Facility Exemption Application Form available on the GSI Website and submit it to the IMO by email or post to the address specified in the form.
- 8.1.3 Where an Applicant has been nominated by the owner, controller and/or operator of the Facility, the Applicant must include in the Facility Exemption Application Form, information to demonstrate that each owner, controller or operator (as applicable) of

the Facility, consents to the Applicant submitting an Exemption Application in relation to the Facility.

8.2 The IMO's Facility Exemption Process

- 8.2.1 Once an Exemption Application is received by the IMO, the IMO must assess whether the information contained in the application is sufficient to grant an Exemption in relation to the Facility.
- 8.2.2 Where the IMO assesses that further information is required, the IMO must make a first information request within 10 Business Days of the receipt of the Facility Exemption Application Form. The first information request must give the Applicant 10 Business Days (the relevant date in subrule 43(7)(b)) to provide the requested information.
- 8.2.3 The Applicant must provide the requested information to the first information request by the relevant date.
- 8.2.4 If the Applicant does not respond to the first information request by the relevant date, the IMO may refuse the Exemption Application.
- 8.2.5 On the first information request closing date (the relevant date), if the IMO has received information and has assessed that more information is required, it may make a second information request within 10 Business Days of the first information request closing date. The second information request must give the Applicant 10 Business Days (the relevant date in subrule 43(7)(c)) to deliver the requested information.
- 8.2.6 The Applicant must provide the requested information to the second information request by the relevant date.
- 8.2.7 If the Applicant does not respond to the second information request by the relevant date, the IMO may refuse the Exemption Application.
- 8.2.8 The IMO may clarify the information requested in either the first or second information request and, if the IMO considers it appropriate, may re-set the relevant date for the request.
- 8.2.9 When the IMO assesses that no more supporting information is required, the IMO must, within 10 Business Days (the relevant date in subrule 43(7)), decide to:
- (a) accept the Exemption Application; or
 - (b) refuse the Exemption Application.
- 8.2.10 The IMO must only accept an Exemption Application, if the specific Exemption Criteria for that Facility are met. **[rules 44, 45, 46 and 47]**
- 8.2.11 Where the IMO accepts an Exemption Application, it must do the following by the relevant date:
- (a) notify the Applicant and any owner, controller or operator of the Facility (as applicable) by email or post that its Application has been accepted and specify the Gas Day on which Exemption takes effect;
 - (b) amend the GSI Register to record the Exemption; and
 - (c) publish a notice of the change to the GSI Register on the GSI Website.
- 8.2.12 Where the IMO accepts an Exemption Application in relation to a Registered Facility, the IMO must deregister the Registered Facility in accordance with Section 6.3 of this Procedure, at the same time as accepting the Exemption Application.

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- 8.2.13 The IMO may also, if applicable, deregister the relevant Registered Facility Operator in accordance with Section 6.4 of this Procedure.
- 8.2.14 Where the IMO refuses an Exemption Application for any of the reasons in subrule 43(3), the IMO must notify the Applicant, and any owner, controller or operator of the Facility (as applicable) by email or post, that the application has been refused and give reasons for refusal, by the relevant date in subrule 43(6).
- 8.2.15 Where the IMO refuses an Exemption Application, the operator of the Facility may submit a Registration Application in respect of the Facility.

8.3 Revocation of Exemption

- 8.3.1 Where the IMO reasonably believes that a Facility previously granted an Exemption, no longer satisfies the requirement of an Exemption, it may revoke the Exemption. **[rule 48]**
- 8.3.2 Where the IMO decides to revoke an Exemption, it must notify the operator of the Facility by email or post, of the:
- (a) reasons for the revocation; and
 - (b) Exemption Cancellation Date which must be no earlier than 20 Business Days after the date of the revocation notice.
- 8.3.3 As soon as practicable after issuing the revocation notice, the IMO must:
- (a) publish the reasons for revocation on the GSI Website;
 - (b) amend the GSI Register to record the revocation; and
 - (c) publish a notice of the change to the GSI Register on the GSI Website.
- 8.3.4 If a Gas Market Participant receives a revocation notice, it must, as soon as practicable, make a Registration Application in relation to the Facility in accordance with Section 3 of this Procedure.
- 8.3.5 If a Gas Market Participant receives a revocation notice and the Gas Market Participant has reasonable grounds to believe the notice should not have been issued, the Gas Market Participant must, by the Exemption Cancellation Date:
- (a) notify the IMO by email or post; and
 - (b) in that notice, provide the IMO with information demonstrating that the revocation notice should not have been issued.
- 8.3.6 The IMO may cancel a revocation notice at any time prior to the Exemption Cancellation Date where the notice was issued as a result of a mistake or incorrect information. The IMO may do so of its own volition or in response to information provided under step 8.3.5.
- 8.3.7 Where the IMO cancels a revocation of Exemption, it must, as soon as practicable:
- (a) notify the operator of the Facility by email or post; and
 - (b) publish the cancellation on the GSI Website.
- 8.3.8 Where an owner, controller or operator of an Facility that is the subject of an Exemption becomes aware that the Facility may no longer meet the relevant Exemption Criteria, it must, as soon as practicable:
- (a) inform the IMO by email or post; and
 - (b) register the Facility in accordance with Section 3 of this Procedure.

9 EXEMPTION FROM THE PROVISION OF CERTAIN GBB DATA

9.1 Exemption from Providing GBB Data – GBB Storage Facilities

9.1.1 A Registered Storage Facility Operator may apply for an Exemption from providing the following GBB data in relation to a GBB Storage Facility:

- (a) Nominated and Actual Flow Data **[subrule 67(3)]**; and
- (b) Daily Actual Flow Data. **[subrule 68(2)]**

9.1.2 A Registered Storage Facility Operator that wishes to apply for an Exemption from providing this data, must complete the GBB Data Provision Exemption Form available on the GSI Website and submit it to the IMO by email or post to the address provided in the form.

9.1.3 A GBB Data Provision Exemption Form for a Facility may be submitted with, or at any time after, a Registration Application in relation to the Facility.

9.2 Exemption from Providing GBB Data – GBB Production Facilities

9.2.1 A Registered Production Facility may apply for an exemption from providing Daily Actual Flow Data in relation to a GBB Production Facility. **[subrule 73(2)]**

9.2.2 A Registered Production Facility Operator that wishes to apply for an exemption from providing this data, must submit a GBB Data Provision Exemption Form to the IMO by email or post to the address provided in the form.

9.2.3 A GBB Data Provision Exemption Form for a Facility may be submitted with, or at any time after, a Registration Application for the Facility.

9.3 Exemption from Providing GBB Data – GBB Large User Facilities

9.3.1 A Registered Large User may apply for an Exemption from providing Daily Actual Consumption Data. **[subrule 78(2)]**

9.3.2 A Registered Large User that wishes to apply for an Exemption from providing this data, must complete the GBB Data Provision Exemption Form available on the GSI Website and submit it to the IMO by email or post to the address provided in the form.

9.3.3 A GBB Data Provision Exemption Form for a Facility may be submitted with, or at any time after, a Registration Application for the Facility.

9.4 The IMO's Process for Exemptions from Providing GBB Data

9.4.1 Once a GBB Data Provision Exemption Form is received by the IMO, the IMO must assess whether the application is sufficient to grant an exemption from providing the relevant GBB data in relation to the Facility.

9.4.2 Where the IMO considers that further information is required, the IMO may, as soon as practicable, request further information from the Registered Facility Operator (or Applicant), specifying the date by which the information must be provided, which must be reasonable in the circumstances.

9.4.3 The Registered Facility Operator (or Applicant) must respond to the request within the time specified in the request.

9.4.4 If the Registered Facility Operator (or Applicant) does not provide the requested information by the time specified, the IMO may refuse the application.

- 9.4.5 If the IMO has sufficient information to assess the application, the IMO must, as soon as practicable decide whether to accept or refuse the application and must notify the Registered Facility Operator (or Applicant), by email or post, of this decision.
- 9.4.6 If the IMO accepts the application, the IMO must specify the Gas Day on which the exemption takes effect.
- 9.4.7 If the IMO refuses the application, it must advise the Registered Facility Operator (or Applicant) of the reason(s) for refusing the application. The Registered Facility Operator must continue to provide the data in accordance with applicable Rules and Procedures.
- 9.4.8 The IMO may revoke an exemption where it is satisfied that the requirements of subrule 67(3), 73(2) or 78(2) (as applicable) are no longer being met.
- 9.4.9 If the IMO decides to revoke an exemption, it must, as soon as practicable, provide the Registered Facility Operator, by email or post:
- (a) a notice that it has revoked the exemption;
 - (b) the reason(s) for the decision; and
 - (c) the Gas Day on which the revocation takes effect.
- 9.4.10 If a Registered Facility Operator receives a revocation notice, it must start providing the relevant GBB data from the effective revocation date.
- 9.4.11 If a Registered Facility Operator receives a revocation notice and the Gas Market Participant has reasonable grounds to believe the notice should not have been issued, the Gas Market Participant must, by the Gas Day specified in the revocation notice:
- (a) notify the IMO by email or post; and
 - (b) in that notice, provide the IMO with information demonstrating that the revocation notice should not have been issued.
- 9.4.12 The IMO may cancel a revocation notice given under step 9.4.9 and, if it does so, must as soon as practicable notify the Registered Facility Operator.



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Gas Services Information Procedure: Operation of the Gas Bulletin Board and the Emergency Management Facility

VERSION 2

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GAS SERVICES INFORMATION ACT 2012
GAS SERVICES INFORMATION
REGULATIONS 2012
GAS SERVICES INFORMATION RULES
COMMENCEMENT:

This Gas Services Information Procedure takes effect from 8:00am (WST) on the same date as the Gas Services Information Rules.

VERSION HISTORY

Version	Effective Date	Notes
1	GSI Rules Commencement	GSI Procedure: Operation of the GBB and the EMF
2	DD Month 2014	Amendments to GSI Procedure resulting from GPC_2014_01

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INDEPENDENT MARKET OPERATOR

GSI Procedure: Operation of the GBB and the EMF **Version 2**

1 PROCEDURE OVERVIEW

1.1 Relationship with the Gas Services Information Rules

1.1.1 This Gas Services Information (GSI) Procedure for Operation of the Gas Bulletin Board and the Emergency Management Facility (Procedure) should be read in conjunction with Parts 3, 4 and 5 of the Gas Services Information Rules (GSI Rules).

1.1.2 Reference to particular GSI Rules or subrules within the Procedure in bold and square brackets **[rule XX]** or **[subrule XX(X)]** are current as of **DD Month 2014**. These references are included for convenience only and are not part of this Procedure.

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1.2 Purpose of this Procedure

1.2.1 This Procedure outlines the process of:

- (a) submitting Standing Data and Contact Information;
- (b) submitting periodic Gas Bulletin Board (GBB) data;
- (c) submitting data for the Emergency Management Facility (EMF);
- (d) publishing information on the GBB and the EMF;
- (e) activation and deactivation of the EMF; and
- (f) archiving of information published on the GBB and EMF.

1.3 Associated Documents

1.3.1 Documents such as the following guides are associated with this Procedure¹:

- (a) GBB User Guide;
- (b) GBB Participant Submission Interface Document; and
- (c) EMF User Guide.

1.4 Application of this Procedure

1.4.1 This Procedure applies to the IMO and Registered Participants. In respect of the EMF, this Procedure also applies to the Coordinator of Energy and Gas Market Participants.

1.5 Terminology and Definitions

1.5.1 A word or phrase defined in the GSI Act, the GSI Regulations and the GSI Rules has the same meaning when used in this Procedure. In addition the following defined terms have the meaning given.

Term	Definition
Authorised Person	A person representing a Registered Participant who is authorised by that Participant to supply information to the IMO. The Authorised Person may be a primary or alternate contact person or an administrative user registered with the IMO or a person nominated by the company (including a data agent).

¹ These documents are available on the GSI Website: <http://imowa.com.au>.

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Term	Definition
Timeframe	The window periods for submission, update and publication of different types of data as defined in this Procedure (under step 2.4.12 for data submission and updates; and under step 4.3.5 for data publication)

2 DATA PROVISION TO THE GAS BULLETIN BOARD

2.1 Summary

2.1.1 The following table summarises how Gas Market Participants must submit and update data and information for publication on the GBB:

Data or Information	Method of update	Procedure steps
Contact Information		
Contact Persons	Submit to the IMO's GBB	2.3
All other information	To the IMO by email or post	2.3
Standing Data		
Nameplate Capacity Data	Submit to the IMO's GBB	2.2
Facility Data	To the IMO by email or post	2.2
Information provided under subrule 61(1)	To the IMO by email or post	2.2
EMF Information	Submit to the IMO's GBB	6.3
Periodic GBB Data		
Medium Term Capacity Outlook (excluding transitional arrangement)	Submit to the IMO's GBB	2.4.12
Medium Term Capacity Outlook (transitional arrangement)	To the IMO by email or post	2.4.3
Capacity Outlook	Submit to the IMO's GBB	2.4.12
Linepack Capacity Adequacy (LCA) Flag	Submit to the IMO's GBB	2.4.12
Nominated and Forecast Flow Data	Submit to the IMO's GBB	2.4.12
Daily Actual Flow Data	Submit to the IMO's GBB	2.4.12
Daily Actual Consumption Data	Submit to the IMO's GBB	2.4.12
Gas Specification Data	Submit to the IMO's GBB	2.4.12
PIA Summary Information	To the IMO by email or post	2.4.4
Aggregated Shipper Delivery Quantities	Submit to the IMO's GBB	2.4.12
Data provision when EMF is active		
Data as requested when EMF activated	To the IMO by email	6.4

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2.1.2 The email address and the postal address to which relevant data must be sent are the addresses published on the GSI Website.

2.2 Standing Data

2.2.1 A Registered Facility Operator must provide Standing Data as a part of the Registration Application when registering a Facility. Standing Data includes:

- (a) Facility Data;
- (b) Nameplate Capacity Data;
- (c) the ~~Delivery Points~~ in relation to which Gas Specification Data is provided by PIA Pipelines; and
- (d) EMF Information (refer to Section 6 below).

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2.2.2 A Registered Facility Operator must maintain its Standing Data and ensure it is current at all times.

2.2.3 As soon as a Registered Facility Operator becomes aware of any change to the Facility Data or delivery points in relation to which Gas Specification Data is provided in respect of any of its GBB Facilities, it must submit the change to the IMO by email or post. The Registered Facility Operator must include in its notification the Gas Day when the change becomes effective.

2.2.4 Where the IMO receives a notification from an Authorised Person of changes to Facility Data or a delivery point in relation to which Gas Specification Information is provided, the IMO must update the requisite information on the GBB as soon as practicable and ensure that the change is activated on the Gas Day it takes effect.

2.2.5 Where the IMO decides to make changes to Delivery Points or Receipt Points for which a Registered Facility Operator must provide data, the IMO must notify that operator via email or post, of the changed Delivery Point or Receipt Point information before the Gas Day on which those changes take effect.

2.2.6 A Registered Facility Operator must update the Nameplate Capacity Data for each GBB Facility that it operates between 1 January and 31 March annually.

2.2.7 Where a Registered Facility Operator becomes aware at any time of a change to the Nameplate Capacity Data in respect of any GBB Facility that it operates, it must update the applicable Nameplate Capacity Data where the change is:

- (a) more than 10% of the current Nameplate Capacity Data; and
- (b) likely to impact on the Facility or Gate Station (as applicable) for more than one year.

2.2.8 A Registered Facility Operator must update the Nameplate Capacity Data for each GBB Facility that it operates by submitting changes directly to the IMO's GBB.

2.2.9 The IMO must, as soon as practicable, on receipt of an update to the Nameplate Capacity Data of a Facility, publish the updated Nameplate Capacity Data on the GBB.

2.3 Participant Information

2.3.1 A Registered Participant must maintain its Contact Information ~~[subrule 53(1)] and other information provided for the purposes of registration~~ and ensure it is current at all times.

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2.3.2 A Registered Participant must update the Contact Information for its primary contact person **[subrule 53(3)(e)]** or any alternate contact persons **[subrule 53(3)(f)]**, by submitting the changes to the GBB.

2.3.3 Where a Registered Participant is required to update any other Contact Information or other information provided for the purposes of registration (e.g. company Contact Information, billing contact information or administrative user information), it must submit those changes to the IMO by email or post.

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2.3.4 The IMO must, as soon as practicable, on receipt of an update to company Contact Information from an Authorised Person, publish the updated Contact Information on the GBB.

2.4 Periodic GBB data provision

2.4.1 A Registered Facility Operator must submit data in respect of its Registered Facilities in accordance with the GSI Rules and this Procedure.

2.4.2 A Registered Facility Operator must submit and update data, other than a maintenance report submitted under Division 5 in Schedule 3 or PIA Summary Information, by submitting it directly to the GBB.

2.4.3 A Registered Facility Operator that has elected to submit a maintenance report under Division 5 in Schedule 3 must submit this report and provide any updates by email or post to the IMO.

2.4.4 A PIA Production Facility Operator must submit new or revised PIA Summary Information to the IMO by email or post. **[rule 74]**

2.4.5 A Registered Facility Operator must submit and update data within the Timeframe specified for that data type in step 2.4.12.

2.4.6 A Registered Facility Operator must submit and update data other than maintenance reports or PIA Summary Information in the form of Comma Separated Values (CSV) files as specified by the IMO in the GBB User Guide and GBB Participant Submission Interface Document.

2.4.7 If a Registered Facility Operator becomes aware of a change to the most recently provided data for any Gas Day that has not ended yet, it must update the data within the Timeframe specified in step 2.4.12 for updating that data type.

2.4.8 Where a Registered Facility Operator is unable to submit the data in the specified manner and form, the IMO may, at its discretion, accept the data in a different form (such as a word document) and in a different manner (such as via email or post) for that instance. The Registered Facility Operator must request the IMO for permission to submit data in a different manner and form for that instance, before the specified Timeframe expires.

2.4.9 A Registered Facility Operator that is unable to submit or update data in the Timeframe must endeavour to submit or update it, as soon as practicable, before the end of the Gas Day on which that data must be provided.

2.4.10 Where, at the time a Registered Facility Operator is required to provide a new or updated Capacity Outlook or LCA Flag in respect of a GBB Facility, and the data provided for the last Gas Day in the outlook has not changed and can be applied to the following Gas Day, the Registered Facility Operator may, but need not, submit new data.

2.4.11 If the IMO has not received an updated Capacity Outlook or LCA Flag, in respect of a GBB Facility for the next Gas Day, the IMO must deem the data submitted (or deemed) for the latest Gas Day to be the data for the following Gas Day.

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2.4.12 Data submissions must be made in accordance with the following table.

Data Type	Facility Type(s)	Data Description	Timeframes
Capacity Outlook*	Pipeline Storage Production	The Capacity Outlook of the Facility for Gas Day D+1 to Gas Day D+7 inclusive. Pipelines [rule 57] Storage Facilities [rule 65] Production Facilities [rule 72]	Submission: Daily on Gas Day D between 8:00 AM and 6:00 PM. Update: Daily between 8:00 AM and 9:00 AM and between 9:00 AM and 1:00 PM on each Gas Day if there is a change in the most recent Capacity Outlook.
Nominated and Forecast Flow Data*	Pipeline Storage	For each Delivery Point and each Receipt Point: <ul style="list-style-type: none"> the aggregated nominated gas flow on Gas Day D+1; and the aggregated forecasted gas flow for Gas Day D+2 to D+7 inclusive <i>(if the Facility Operator has been provided with forecast quantities by the Shippers.)</i> Pipelines [rule 59] Storage Facilities [rule 67]	Submission: Daily on Gas Day D between 8:00 AM and 6:00 PM. Update: Daily between 8:00 AM and 9:00 AM and between 9:00 AM and 1:00 PM on each Gas Day D if there is a change in the most recent data.
LCA outlook	Pipeline Storage	The LCA Flag for the Facility for Gas Day D+1 to Gas Day D+3 inclusive. If a Pipeline is located in more than one Zone, a separate LCA Flag must be provided for each Zone. Pipelines [rule 58] Storage Facilities [rule 66]	Submission: Daily on Gas Day D between 8:00 AM and 6:00 PM. Update: As soon as practicable where there is a change in the current outlook.
Daily Actual Flow Data	Pipeline Storage Production	For each Delivery Point and each Receipt Point: The actual gas flow at that point for Gas Day D. Pipelines [rule 60] Storage Facilities [rule 68] Production Facilities [rule 73]	Submission: Daily on Gas Day D+2 between 8:00 AM and 2:00 PM. Update: <u>Data for GBB Production Facilities as required but not later than one year after the end of the GSI Invoice Period the Gas Day is in.</u>

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GSI Procedure:
Operation of the GBB and the EMF [Version 2](#)

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Data Type	Facility Type(s)	Data Description	Timeframes
Daily Actual Consumption Data	Large User	The actual gas consumption by the Facility for Gas Day D. [rule 78]	Submission: Daily on Gas Day D+2 between 8:00 AM and 2:00 PM.
Gas Specification Data	PIA Pipeline PIA Production	Gas Specification Data for Gas Day D. Pipelines: average HHV [rule 61] Production Facilities: gas quantity and average HHV [rules 74 and 75]	Submission: Daily on Gas Day D+8 between 8:00 AM and 2:00 PM.
Medium Term Capacity Outlook*	Pipeline Storage Production	Planned Service Notifications for all upcoming work which is expected to impact the capacity of the Facility by a material amount (the greater of 10% of Nameplate Capacity or 10TJ) during the next 12 calendar months (M+1 to M+12 inclusive). Pipelines [rule 56] Storage Facilities [rule 64] Production Facilities [rule 71]	Submission: By 6:00 PM on the last day of the calendar month M. Update: As soon as practicable where there is a change in the most recent outlook. No update is required for the Gas Days included in the current Capacity Outlook.
Aggregated Shipper Delivery Quantities	Pipeline	The aggregated quarterly deliveries to each Shipper on the pipeline. Report is for the purposes of calculating GSI Fees. [rule 115]	Submission: Quarterly 20 Business Days after the end of the period. Update: As required, but no later than one year after the end of the <u>relevant GSI Invoice Period</u> .

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* The Capacity Outlook and Nominated and Forecast Flows data will be affected by a two year transitional period **[Schedule 3, Division 1]**, where participants are only obliged to provide outlook data for three days in the future, increasing to a mandatory seven day outlook after the two year transitional period. The Medium Term Capacity Outlook is also subject to a two year transition, during which a maintenance report under Schedule 3, Division 5 may be provided.

2.5 Data exchange and user access

- 2.5.1 After a participant has been registered in accordance with the GSI Rules and relevant GSI Procedure, the IMO must, by the time the registration becomes effective, set up a participant account to access the GBB and provide the administrative user of the Registered Participant with a username and password to access the account.
- 2.5.2 The administrative user of the Registered Participant may nominate more than one user to have access to submit information to the GBB on behalf of the participant. The administrative user must request the IMO to provide access to nominated users by email.
- 2.5.3 The IMO must provide each of the nominated users in step 2.5.2 with an individual username and password for the GBB.

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2.5.4 The IMO must enable the Authorised Persons of a Registered Participant to submit data to the GBB for the Facilities it is registered as the operator of, and to update applicable Contact Information using the options outlined in this Procedure and the GBB User Guide.

2.6 Automatic data transfer

2.6.1 A Registered Participant may install an automatic data transfer mechanism and interface to automatically submit data to the GBB. The Registered Participant must refer to the GBB Participant Submission Interface Document² for guidelines on setting up an automatic data transfer.

2.6.2 If a Registered Participant meets the data and system security requirements provided by the IMO, the IMO must:

- (a) provide a test environment for the participant to test its data transfer mechanism and interface; and
- (b) subject to the satisfactory testing of the data transfer mechanism and interface, provide the participant with the applicable access to submit data directly to the GBB.

2.6.3 Where a Registered Participant experiences problem in submitting data through its automatic data transfer system, the participant is required to submit and update data using other mechanisms as described in this Procedure, the GBB Participant Submission Interface Document and the GBB User Guide.

2.7 Data provision during GBB system outages

2.7.1 Where the IMO plans or becomes aware of a system failure or outage, it must notify Registered Participants as soon as practicable. Notification may be provided via email, phone or an advisory on either or both of the GSI Website and the GBB.

2.7.2 The IMO may notify Registered Participants to submit data in a different form and manner (such as email) than that specified in Section 2.4 of this Procedure for the duration of the system outage.

2.7.3 Where the IMO sends a notification in step 2.7.2, Registered Participants must comply with that request.

2.7.4 Where the IMO provided notification of a system outage and a Registered Participant is unable to comply with its obligations to provide data due to the outage, the participant must provide data as soon as reasonably practicable after the system outage has ended. **[subrule 20(4)]**

3 EXEMPTION FROM THE PROVISION OF CERTAIN GBB DATA

3.1.1 Where a Registered Storage Facility Operator, Registered Production Facility Operator or Registered Large User considers that Nominated and Forecast Flow Data, Daily Actual Flow Data and/or Daily Actual Consumption Data it is required to provide will duplicate data that is, or will be, provided by a Registered Pipeline Operator, then it may apply for an Exemption from the requirement to provide that data type.

² Available at: <http://www.imowa.com.au/electricity-and-gas-services/gas-information-services-project--gisp/gbb-systems-and-interface>.

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3.1.2 A Registered Participant may refer to Section 8 of the GSI Procedure: Registration, Deregistration, Exemptions and Transfer for the process for applying for an exemption from providing this data.

4 DATA PUBLISHED ON THE GAS BULLETIN BOARD

4.1 Publishing network representation – Zone information [rule 83]

- 4.1.1 The IMO must publish and maintain the information required in rule 83 on the GBB.
- 4.1.2 The IMO must, as soon as practicable following the receipt of information or updated information from a Registered Participant relating to the information published under rule 83, publish the revised information.

4.2 Publication of information on the GBB – general [rule 84]

- 4.2.1 The IMO must publish and maintain the information required in rule 84 on the GBB.
- 4.2.2 The IMO must, as soon as practicable following the receipt of information or updated information from a Registered Participant relating to the information published under rule 84, publish the revised information.

4.3 Publishing reports

- 4.3.1 To the extent possible, the IMO must publish daily and monthly reports on the GBB in accordance with the Timeframes provided under step 4.3.5.
- 4.3.2 The IMO must use reasonable endeavours to update the applicable report(s) on the GBB each time an update is submitted by a Registered Participant.
- 4.3.3 Where the IMO publishes a report, it must do so with a date and time stamp identifying which Gas Day the report pertains to and at what time it was generated.
- 4.3.4 The IMO may commence publication of reports for Gas Day D from 6:00 AM on Gas Day D-1.
- 4.3.5 The following table summarises the Timeframes for the publication of reports on the GBB.

Report Name	Description	Timeframes
Capacity Outlook**	The 7 day Capacity Outlook for all GBB Pipelines, GBB Storage Facilities and GBB Production Facilities from Gas Day D to Gas Day D+6 inclusive. [subrule 85(a)]	Initial Report: Daily between 6:00 AM on Gas Day D-1 and the start of Gas Day D. Update: As soon as possible following the receipt of updated data.
Linepack Capacity Adequacy Outlook	The LCA Flag for each GBB Pipelines or parts of a GBB Pipeline in a Zone* and each GBB Storage Facility for Gas Day D to D+2 inclusive. [subrule 85(b)]	Initial Report: Daily between 6:00 AM on Gas Day D-1 and the start of Gas Day D. Update: As soon as possible following the receipt of updated data.
Nominated and Forecast Flow	For each Zone and each GBB Storage Facility:	Initial Report: Daily between 6:00 AM on

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Report Name	Description	Timeframes
Data**	<ul style="list-style-type: none"> The aggregated quantity of gas nominated for all Receipt Points Day D and forecast for each of Gas Day D+1 to D+6 inclusive. The aggregated quantity of gas nominated and for all Delivery Points for Gas Day D and forecasts for each of Gas Day D+1 to D+6 inclusive. <p>Zones [subrule 86(1)(a) and (b)] Storage Facilities [subrule 86(1)(c)]</p>	<p>Gas Day D-1 and the start of Gas Day D.</p> <p>Update: As soon as possible following the receipt of updated data.</p>
Actual Flows	<p>For each Zone [subrules 87(1)(a) and (b)] The actual flow of gas aggregated for all Receipt Points and aggregated for all Delivery Points for each Gas Day D.</p> <p>For each Gate Station [subrule 87(1)(c)] The aggregated actual flow of gas each Gas Day D.</p> <p>For each GBB Storage Facility [subrule 87(1)(d)] The actual gas flow into the storage and out of the storage facility for each Gas Day D.</p> <p>For each GBB Production Facility [subrule 87(1)(e)] The actual gas out of the production facility for each Gas Day D.</p>	<p>Report: Daily between 2:00 PM and 6:00 PM on Gas Day D+2.</p> <p>Update: <u>As soon as possible following the receipt of updated data for a GBB Production Facility.</u></p>
Daily Consumption by Zone	<p>Aggregate (by Zone) actual gas consumption of Large User Facilities for each Gas Day D. [subrule 89(1)(a)]</p> <p>Aggregate (by Zone) actual gas quantity injected into the Distribution System (excluding Large User Facilities) for every Zone for each Gas Day D. [subrule 89(1)(b)]</p> <p>Aggregate (by Zone) actual gas consumption excluding Large User Facilities and Distribution System for every Zone for each Gas Day D. [subrule 89(1)(c)]</p>	<p>Report: Daily between 2:00 PM and 6:00 PM on Gas Day D+2.</p>
Large User Consumption Information	<p>Actual gas consumption for each Large User Facility for every Gas Day D. [subrule 88(3)]</p> <p>Actual gas consumption, aggregated by Zone and Consumption Category for each Gas Day D. [subrule 88(1)]</p>	<p>Report: Daily between 2:00 PM and 6:00 PM on Gas Day D+7.</p>
Gas Specification Data	<p>Gas Specification Data for PIA Pipelines and PIA Production Facilities (and Non-PIA Gas Production Facilities which are obliged to submit Gas Specification Data) for every Gas</p>	<p>Report: Daily between 2:00 PM and 6:00 PM on Gas Day D+8.</p>

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Report Name	Description	Timeframes
	Day D. [rule 90]	
Medium Term Capacity Outlook**	Planned Service Notifications (or maintenance reports) for all upcoming capacity constraints of all Registered Facilities during the next 12 calendar months (M to M+11 inclusive). [subrule 85(c)]	Initial Report: Monthly between 6:00 AM and 8:00 AM on the first day of each calendar Month M. Update: As soon as practicable where an update is submitted.

** The publication of Capacity Outlook, Nominated and Forecast Flows data and Medium Term Capacity Outlook will be affected by the two year transitional arrangements [Schedule 3]

4.4 Publishing information on the GBB Map [rule 91]

- 4.4.1 The IMO must first publish the information displayed on the GBB map for Gas Day D between 6:00 AM on Gas Day D-1 and the start of Gas Day D.
- 4.4.2 The IMO must, as soon as practicable following the receipt of updated information that is relevant to the information required to be published on the map for Gas Day D, publish updated information on the GBB map.
- 4.4.3 The IMO is no longer required to publish information for Gas Day D after 6:00 AM on that Gas Day, where the IMO has commenced publishing information for the following Gas Day under step 4.4.1.

4.5 Publishing data during system outages

- 4.5.1 Where the IMO is unable to publish information on the GBB due to a system outage or failure, the IMO must use reasonable endeavours to resolve the outage of failure as soon as practicable.
- 4.5.2 Once a system outage is resolved, the IMO must publish the latest available reports on the GBB.
- 4.5.3 Where the IMO is unable to publish information on the GBB and the IMO has received data during the period of the outage, the IMO must archive that data and make it available upon request.

5 DATA ARCHIVING ON THE GAS BULLETIN BOARD

5.1 Archiving of GBB Data

- 5.1.1 The IMO must archive all published data, after the relevant Gas Day has passed.
- 5.1.2 The IMO may, at its discretion, remove and archive reports from the GBB in case there is an overload on the GBB, but must not remove a report any earlier than two years after the relevant Gas Day.
- 5.1.3 Notwithstanding step 5.1.2, on each Gas Day the IMO must archive reports that are updated and replaced by a subsequent report containing updated information for that Gas Day published on the GBB.
- 5.1.4 The IMO must enable a feature on the GBB to allow the public to download current GBB reports. The IMO must provide archived reports to any person upon request.

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6 EMERGENCY MANAGEMENT FACILITY OPERATION

6.1 Activation and Deactivation of the EMF

- 6.1.1 The IMO must establish and maintain the EMF as a part of the GBB. **[subrule 92(1)]**
- 6.1.2 The IMO must activate the EMF as soon as practicable following receipt of an EMF Direction from the Coordinator of Energy. An EMF Direction may be sent in accordance with the communication protocol established between the IMO and the Coordinator of Energy.
- 6.1.3 As soon as practicable following the activation of the EMF, the IMO must display an indicator on the GBB notifying the public that the EMF has been activated, and publish the notice issued by the Coordinator of Energy. **[rule 81]**
- 6.1.4 As soon as practicable following the deactivation of the EMF Direction, the IMO must remove the EMF indicator published on the GBB.

6.2 Access to the EMF

- 6.2.1 Upon activation, the Coordinator of Energy must direct the IMO to grant access to the EMF to those persons identified in an EMF Direction.
- 6.2.2 The IMO must grant access in accordance with an EMF Direction received under step 6.2.1.
- 6.2.3 An EMF Direction may provide for different levels of access to different persons, and the IMO must provide the levels of access specified in the direction.
- 6.2.4 Each time the EMF is activated, the IMO must create a username and password for each person that is to access the EMF. The IMO must notify each person by email of their username and password.
- 6.2.5 At the same time as deactivating the EMF, the IMO must also deactivate the EMF access provided to each person.

6.3 Data provision to the EMF

- 6.3.1 Where a Registered Participant is required to provide EMF Information, it must provide that information as part of the Registration Application.
- 6.3.2 A Registered Facility Operator must update the EMF Information for each GBB Facility that it operates annually, between 1 January and 31 March.
- 6.3.3 Where the Registered Facility Operator at any time becomes aware of a change to the EMF Information for a GBB Facility that it operates (other than EMF Information for Large User Facilities), it must update the applicable EMF Information as soon as practicable, where the change is:
 - (a) more than 10% of the relevant component of current EMF Information; and
 - (b) likely to impact on the Facility for more than one year.
- 6.3.4 If a Registered Large User at any time becomes aware of a change to the EMF Information for a Large User Facility that it operates, it must update the applicable information as soon as practicable.
- 6.3.5 A Registered Facility Operator must update the EMF Information for each GBB Facility that it operates by submitting changes directly to the GBB.

6.4 Actions upon EMF Activation – information provision and publication

- 6.4.1 Gas Market Participants (including, but not limited to Registered Participants) may be asked to submit data in response to an EMF Direction.

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- 6.4.2 The IMO must request a Gas Market Participant to provide data where that data is specified in the:
- (a) GSI Rules, subject to an EMF Direction; or
 - (b) EMF Direction.
- 6.4.3 A Gas Market Participant must provide the information requested under step 6.4.2:
- (a) by the time specified in the request from the IMO, or the GSI Rules, as applicable; and
 - (b) in the form specified by the IMO.
- 6.4.4 Where requested by the IMO in accordance with rule 97(2), a Registered Pipeline Operator must submit, for each of its GBB Pipelines, Daily Actual Flow Data for Gas Day D by 9:00 AM on Gas Day D+1 and update the data by 12:00 PM on Gas Day D+1. The Registered Pipeline Operator must fulfil this obligation for the entire period the EMF is activated, by submitting the data directly into the GBB.
- 6.4.5 The IMO must publish the Daily Actual Flow Data received under step 6.4.4 on the EMF as soon as practicable.
- 6.4.6 When the EMF is activated, the IMO may exchange information on data requirements with Gas Market Participants via email.
- 6.4.7 When the EMF is activated, Gas Market Participants must submit requested data in the manner requested by the IMO.
- 6.4.8 When the EMF is activated, Gas Market Participants must continue to fulfil their obligations to submit data to the GBB.
- 6.4.9 When the EMF is activated, Registered Participants must check the EMF Information for each GBB Facility it operates and ensure that it is accurate and up to date.
- 6.4.10 The IMO must upload all EMF data received from Gas Market Participants to the EMF as soon as practicable after it receives the data.

6.5 Archiving EMF Data

- 6.5.1 When the EMF is deactivated, the IMO must remove all data submitted and published in relation to that activation and archive it in a manner that enables it to be accessed by the Coordinator of Energy. **[rule 102]**
- 6.5.2 The Coordinator of Energy may request access to archived EMF Information at any time, with the form and timing of access to be agreed between the IMO and the Coordinator of Energy.

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DEVELOPMENT OF A WHOLESALE GAS MARKET IN WESTERN AUSTRALIA

BACKGROUND

At the October 2013 Gas Advisory Board (GAB) meeting, members requested the IMO to investigate the potential development of a wholesale gas market in Western Australia (WA). The IMO committed to include further discussion on the options available in a GAB meeting agenda in early 2014. The IMO engaged Market Reform to develop a discussion paper to outline at a high level the potential structure of a wholesale gas market and facilitate a discussion with GAB members. The purpose of developing this high level design was to test the feasibility of developing a wholesale gas market in WA.

This paper provides an overview of the consultation that the IMO has undertaken and the views expressed to date.

CONSULTATION

Since the initiation of this project, the IMO has held a number of formal and informal consultations with stakeholders across the industry with respect to different aspects of the project.

- **18 February 2014** – The IMO presented to GAB a discussion of different options for the development of a gas market in WA. GAB members discussed the benefits of an independently operated wholesale gas market in WA and the key elements of effective gas and capacity trading mechanisms. GAB members generally supported the continuation of the IMO's investigations into the development of a wholesale gas market in WA.
- **24 and 25 March 2014** – The IMO held a number of informal meetings with GAB members to discuss the proposed guiding principles and a 'strawman' market design.
- **20 May 2014** – The IMO presented to GAB a high level market design and the associated costs to inform its consideration of the progression of a proposal to Government to establish a wholesale gas market in WA. At that meeting, members discussed a number of design options and requested that the IMO hold a workshop to engage the industry more broadly on the proposal.
- **Early July** – The IMO held a number of informal meetings with a broad cross-section of Gas Market Participants to get feedback on the need for and design of the proposed market.
- **16 July 2014** – The IMO held a stakeholder workshop to provide an overview of the project and discuss the need for and design of the proposed market.
- **16 July 2014** – The IMO presented to GAB an overview of the views provided in the consultation to date, including the stakeholder workshop. GAB members discussed their views on the suitability of the existing exchange platforms to meet the industry's needs. Members agreed that stakeholders should be given more time to consider the proposal and provide feedback to the IMO for the GAB to consider at its next meeting.
- **18 July 2014** – The IMO invited submissions from Gas Market Participants and other stakeholders on the proposal for a period of six weeks.

A full list of stakeholders that the IMO has formally and informally consulted with (excluding the stakeholder workshop) is included as Appendix 1. The IMO also received one confidential submission.

SUMMARY OF VIEWS PROVIDED

The IMO has collated comments from the notes taken in its informal meetings held with stakeholders, GAB meetings, the broader stakeholder workshop and submissions made in the consultation period. The IMO has summarised these individual comments and presented them in the sections below, grouped as they relate to various aspects of the proposal.

Development process

- To date the WA gas market has been developing effectively and efficiently, independent of any regulatory or government body direction.
- The Gas Bulletin Board (GAB) and Gas Statement of Opportunities have only been in operation around a year. The associated contribution of these services to improved transparency with respect to short term trading should be assessed before developing facilitated trading arrangements.
- The Government should undertake the consultation process to determine the needs in the WA market and understand what is not being provided by the existing exchange platforms.
- The aim of the review should be to provide recommendations on how the existing exchange platforms can be enhanced to further promote liquidity, transparency and cost effectiveness.
- The Government's Electricity Market Review discussion paper seeks similar feedback on the benefits of developing a gas supply hub and feedback obtained through the IMO's consultation process should be considered in conjunction with feedback provided in response to the review.
- To inform the discussion, it is important the IMO's consultation process provides a more detailed assessment of potential impediments to short term trading (e.g. is it a lack of demand, administrative complexity, or absence of information) as well as the materiality of the issue more broadly.
- An independent quantitative cost/benefit assessment of the proposed option for the wholesale gas market should be conducted and the results openly shared with industry stakeholders.
- There have been steps skipped in the consultation process.
- It is not clear that the GAB has a mandate to develop a market under the current governance structure.

Comments that there is no need for a market

- No market failures which would necessitate government intervention have been identified.
- In 2013, REMCo and the Australian Energy Market Operator (AEMO) completed an analysis of the potential for a gas Short Term Trading Market (STTM) in WA and concluded that an upstream trading hub could be implemented in WA similar to that at Wallumbilla but there does not appear to be any rationale for such a development, given the industry-developed gas trading mechanisms already operating in WA.
- Gas users find it easy to access reliable gas supplies and/or transport when required.
- There is growth and diversity of bilaterally offered products.
- There are a number of current avenues for selling or buying gas, including gas supply agreements and master spot agreements offered by producers, bilateral agreements, formal and informal swap arrangements, a swing service administered by REMCo and a small number of private exchange platforms.
- The development of the GBB has allowed greater transparency of gas volumes and contact details to facilitate gas trading opportunities for new and existing participants.
- Historical trading gas prices and volumes are openly available for users and non-users through the existing market platforms.
- There is no need for another exchange platform unless the service that can be provided is much cheaper and more transparent than the existing arrangements.
- Given the concentrated nature of the WA gas market, search costs are relatively low compared to other jurisdictions. These comparatively low transaction costs will act as a barrier to liquidity in any market developed.
- It is unclear that market intervention would deliver the efficiency gains necessary to justify the associated costs.

- The absence of detailed analysis around the cause and extent of any perceived market failure or the costs/benefits makes it difficult to explicitly evaluate options at this stage of the consultation process.

Comments providing support for a market

- While the analysis undertaken by REMCo and AEMO noted that there did not appear to be any need for the development of a wholesale gas trading hub at the time (given the existing exchange platforms in WA), it also recommended that a gas trading mechanism of some form should be considered if the current gas trading platforms do not provide sufficient price transparency or other market developments arise that warrant its reconsideration.
- The development of further competition in WA's wholesale gas market is still potentially inhibited by: authorisation for joint selling and marketing; management of retention leases; a lack of price transparency; and a lack of responsiveness and flexibility in gas transportation.
- The lack of transparency around gas pricing has often led to difficult and protracted price negotiations and shorter-term contracts to remove the long-term price risk.
- Users balance their positions through imbalance swaps through pipelines and other parties to manage their daily needs but are more frequently now using trading platforms to reduce the administration of managing multiple contracts.
- The development of a robust spot market has the potential to increase the availability of gas, as well as providing a transparent trading mechanism and price indicator for gas in WA.
- Initiatives to develop the state's gas market through the provision of supply, demand and price information to participants are supported.
- Initiatives that will lead to more efficient use of infrastructure are supported.
- Initiatives that increase market liquidity and transparency are encouraged.

Comments on the suitability of existing exchange platforms

- The existing exchange platforms tend not to be very liquid.
- The existing exchange platforms have limited participation from gas producers.
- The existing exchange platforms do not provide adequate prudential arrangements and present too much risk exposure for some potential participants.
- The upfront and ongoing licensing cost of the existing exchange platforms is prohibitive for some participants.
- The lack of independence with respect to some existing exchange platforms is a concern for some participants.
- Some participants are not aware of the functionality that existing exchange platforms offer.
- Some participants are not willing to utilise existing exchange platforms for reasons which have not been made clear.
- Given the limited uptake of trading services provided by gasTrading Australia and Energy Access Services there appears little market demand for an additional short term trading market at this time.
- Industry should work directly with gasTrading Australia and Energy Access Services to enhance the existing exchange platforms to meet the needs of Gas Market Participants instead of developing something new.

General comments on the proposed market design options

- General support was provided for the guiding principles underpinning the proposed market design.
- General support was provided for the proposed market design being voluntary.
- There is merit in exploring the base model which appears to provide a better balance of risks/benefits relative to the extended model.
- An incremental approach to market development reduces risk for participants by minimising the changes required. Additional features likely to produce a net benefit could be considered at a later stage.
- The proposed design is complex.
- The proposed design will require significant change to current business operations.

- The proposed design does not achieve the guiding principles as it would not deliver benefits over and above those achieved under the various current arrangements.
- The success of the Wallumbilla Gas Supply Hub is yet to be fully measured.
- An STTM or Victorian Declared Wholesale Gas Market model is not appropriate given the structure of the WA gas market and because these models do not deliver the wholesale trading functionality necessary for a successful, liquid market.
- Trading hub initiatives should be harmonised across all states so that common processes and standards can be developed by industry participants taking part in these markets.
- An industry standard trading agreement could be considered.
- Other approaches to price discovery could be considered including a 'Gas Price Index'.
- Strong consideration should be given to leveraging off already developed markets to minimise the duplication of effort and ensure that the capital already invested by private sector participants is not undermined.
- Only if existing arrangements cannot be leveraged should a custom designed model be considered and the costs and benefits explored.

Comments on the hub location

- There is some support for two trading hubs at Mondarra and the Pilbara on the basis of the additional flexibility expected at a minimal additional cost.
- There is some question of the impact on liquidity of the market if there were to be two hubs.
- It would be beneficial to group a number of inlet points in the north-west of WA but it may require the addition of delivery or receipt points for some participants.
- The inclusion of Macedon and Wheatstone in the hub could significantly increase the cost for all shippers.
- The proposed extended model appears to exactly match the Dampier to Bunbury Pipeline (DBP) 'Pilbara Service'.
- The proposed model ignores the Goldfields Gas Pipeline (GGT) and the difficulties and costs of transferring gas along the DBP and from the DBP to the GGT.
- Most of the short term trading opportunities are on GGT because of the tighter contract arrangements and more flexible use required by users (primarily miners).
- The proposed design will require participants to have delivery and receipt rights at all points within the hub.
- To facilitate anonymous trading existing contractual arrangements will need to be varied which will require significant time and cost to execute and may be prohibitively expensive for smaller participants.
- Pipeline operators could put into place swap arrangements with customers on the GGT or Pilbara Energy Pipeline through the development of additional services.

Comments on pipeline capacity trading

- For any market to work effectively, it also needs both gas and capacity trading.
- Matching of capacity products is complex due to the number of potential combinations of products.
- The development of capacity products is best placed with facility operators given the bespoke nature of pipeline services.
- Some participants do not see the need for capacity trading because of their extensive transport arrangements.

Comments on other specific market design elements

- Voluntary participation would avoid changes to pipeline arrangements.
- The proposed design would minimise transaction time and cost, provide anonymous trading, enhance transparency and provide full collateralisation of settlement risk.
- The extended netting of transactions would simplify the overall delivery obligations.
- Communication of the net position should be through current contractual obligations not direct from the market operator.

- Given that the market design is predicated on voluntary participation, the extended model under which participants confirm delivery information with the market operator would not work as the facility operator would be unable to apportion from gross allocations.
- The proposed settlement and prudential model is likely to add to market liquidity.
- There is also some individual support for specific elements of the design.

Comments on establishing the market


- If the GAB determines that a gas trading market would be desirable, the most efficient and effective solution would be for industry to lead the development of appropriate options.
- The industry is best placed to deliver benefits to the gas market within a low cost, user-pays framework.
- Government-led policy interventions should only be considered where evidence of market failure or a net public benefit is provided.
- A regulatory driven market mechanism has the potential to force market participants to use the service.
- Gas producers do not at this stage support the GAB or the IMO seeking Government approval to establish a Government-regulated wholesale gas market in WA.
- The role of market maker and the associated obligations should be considered.

Comments on funding the market

- The IMO should be seeking a low capital and operational cost model which may be best achieved by adopting established platforms.
- The market would need to increase the availability of short term gas to add value to the current arrangements, rather than just displace quantities from existing exchange platforms.
- The current IMO estimate of \$1 million dollars plus annual operating expenses is underestimated.
- There appears to be no method to constrain expenditure.
- The costs estimated by the IMO do not include the cost to the industry.
- The additional cost will increase the cost of gas supply in an already high-cost environment.
- The proposed volumes to achieve break-even may need to be reviewed as it is unlikely that these volumes could be achieved in a spot market.
- The costs of administering a gas supply hub in WA may not necessarily be recoverable from a variable charge applied to hub participants alone and may potentially need to be recovered more broadly from shippers who may have chosen not to participate in this market mechanism.
- The recovery of costs of any market mechanism should be borne by those market participants who willingly chose to use such services.
- While user-pays is a preferable model, an upfront fixed fee or sponsorship to support development costs would remove risk of recovering the capital outlay from those who do not use the proposed market.
- The proposed funding model is inconsistent with the approach taken in other gas markets in Australia (such as the STTMs or the Declared Wholesale Gas Market in Victoria).
- It is highly unusual for one market mechanism to be cross-subsidised by other parts of the market. AEMO is expressly forbidden from any such cross-subsidy.
- Other options to finance any new gas trading mechanism could be: Government funding; an up-front subscription fee, potentially with the size of the fee tied to the size of the market participant; and the operator of the gas trading mechanism taking out a loan to finance the mechanism, and recovering the costs over a longer period of time.

Comments on operating the market

- Independent and transparent governance arrangements with industry oversight of the process are important to ensure that participants have confidence in the development and operation of the market.
- The IMO may be best placed to operate a wholesale gas spot market from its experience as administrator of the WEM and GSI functions.
- Governance issues around rule development will need due consideration.

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- The Electricity Market Review includes a specific consideration of the market governance arrangements for WA. This makes commenting on market operator arrangements challenging, given the IMO may undertake a reformed role.
 - It is not desirable for the Government to act as the rule maker and participate in market through policy development.
 - Some participants would prefer a Government-backed service rather than industry-led, on the basis that an industry-led solution could easily be dominated by a small number of large parties.
 - The oversight of the market operation and evolution could be an extension of the GAB's functions.

APPENDIX 1: LIST OF PARTIES CONSULTED WITH

Informal consultation

- Alcoa of Australia
- Alinta Energy
- Apache Energy
- APA Group
- Australian Petroleum Production and Exploration Association
- BHP Billiton
- Citic Pacific
- Chevron
- Dampier to Bunbury Pipeline
- Department of State Development
- Energy Developments Limited
- ERM Power
- Fortescue Metals Group
- gasTrading Australia
- Horizon Power
- Kleenheat Gas
- Minara Resources
- Newmont Power
- North West Shelf Gas
- Origin Energy
- Public Utilities Office
- Rio Tinto
- Santos
- Shell
- Synergy

Submissions received

- Alcoa of Australia
- Alinta Energy
- Apache Energy
- APA Group
- Australian Petroleum Production and Exploration Association
- Chamber of Minerals and Energy
- Chevron
- Energy Access Services
- Energy Supply Association of Australia
- Newmont Power
- REMCo
- Santos
- Synergy
- Wesfarmers Chemicals, Energy & Fertilisers
- Woodside