

Coordinator of Energy
Attn: Director, Wholesale Markets Branch
Energy Policy WA
Perth BC
Western Australia 6850

19th July 2022

Re: GRC_2022_01 Publication of Tanker Gas Information on the Gas Bulletin Board (GBB)

Dear Sir/Madam,

Wesfarmers Energy (Gas Sales) Limited (“WEGS”) purchases and transports natural gas for the manufacture of LNG, LPG, and Ammonia; and, for the on-sale to commercial, industrial, small-to-medium-enterprise and residential customers in Western Australia. WEGS manages the supply and transportation optimisation for the following entities:

- CSBP Limited;
- Wesfarmers Gas Limited; and
- Kleenheat Gas Pty Ltd.

WEGS appreciates the opportunity to comment on the Coordinator of Energy’s Rule Change Proposal GRC_2022_01 in relation to the publication of tanker gas information on the Gas Bulletin Board (“GBB”).

WEGS has strongly supported the obligation for Woodside Energy to report gas usage related to its domestic LNG activities at the Pluto LNG plant at the Gas Advisory Board. This provides greater market and domestic gas policy transparency as Woodside’s domestic LNG sales count towards its domestic gas commitments under the Pluto State Agreement (2006).

WEGS notes that the proposed Gas Services Information (“GSI”) Rule amendment requires ***Production Facilities*** to report ***Monthly Trucked Gas Data*** and defines a ***Production Facility*** as follows:

“a facility at which natural gas is produced for injection into one or more GBB Pipelines, **or**

from which liquified natural gas is transported by a Tanker.”

WEGS believes that the above definition would raise an obligation on all domestic LNG facilities, such as its own domestic LNG facility in Kwinana to report LNG liftings.

Wesfarmers Gas Limited already reports its gas consumption at the plant under the Large User classification as its processing plant consumes gas in the domestic market and qualifies for this reporting obligation under Rule 78 of the GSI Rules.

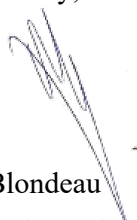
WEGS notes in the minutes of meeting of the Gas Advisory Board dated 21 September 2021 that the intent of the proposed rule change is to capture the reporting of gas sold as LNG from Woodside’s Pluto production facility and not from other facilities which are already captured in GBB reporting.

WEGS suggests to avoid the risk of double reporting by instead amending the definition of a Production Facility as follows:

“a facility at which natural gas is produced, either for injection into one or more GBB Pipelines or for lifting by Tankers in the form of LNG.”

Should you wish to discuss any points raised in this submission, please do not hesitate to contact me.

Yours sincerely,



Vincent Blondeau
Commercial & Wholesale Manager
Wesfarmers Kleenheat Gas Pty Ltd