

Energy Policy WA

Meeting Agenda

Meeting Title:	Gas Service Information Rules Review Working Group (GSIRRWG)	
Date:	Thursday 7 August 2025	
Time:	1:30 PM – 3:30 PM	
Location:	Online, via TEAMS	

Item	Item	Responsibility	Туре	Duration
1	Welcome and Agenda Conflicts of interest Competition Law	Chair	Noting	3 min
2	Meeting Apologies/Attendance	Chair	Noting	2 min
3	Welcome and introductions	Chair	Discussion	5 min
4	Purpose of this review	Chair/Point Global	Discussion	15 min
5	Role of this working group	Chair/Point Global	Discussion	10 min
6	 Recommendations from the Inquiry into the WA Domestic Gas Policy: Final Report Proposed changes to the National Gas Law and National Gas Rules as they may apply in WA 	Chair/Point Global	Discussion	70 min
	 Key changes: Recommendations for the GSOO 	AEMO		
	Key changes: Recommendations for the GBB	Chair/Point Global		
7	Project timeline and next steps	Point Global	Discussion	10 min
8	General business	Chair	Noting	5 min
	Next meeting: 10:00 am Thursday 4 Septemb	per 2025		

Please note, this meeting will be recorded.

Competition and Consumer Law Obligations

Members of the GAB's Gas Services Information Rules Review Working Group (**Members**) note their obligations under the *Competition and Consumer Act 2010* (**CCA**).

If a Member has a concern regarding the competition law implications of any issue being discussed at any meeting, please bring the matter to the immediate attention of the Chairperson.

Part IV of the CCA (titled "Restrictive Trade Practices") contains several prohibitions (rules) targeting anticompetitive conduct. These include:

- (a) cartel conduct: cartel conduct is an arrangement or understanding between competitors to fix prices; restrict the supply or acquisition of goods or services by parties to the arrangement; allocate customers or territories; and or rig bids.
- (b) **concerted practices**: a concerted practice can be conceived of as involving cooperation between competitors which has the purpose, effect or likely effect of substantially lessening competition, in particular, sharing Competitively Sensitive Information with competitors such as future pricing intentions and this end:
 - a concerted practice, according to the ACCC, involves a lower threshold between parties than a contract arrangement or understanding; and accordingly; and
 - a forum like this Working Group is capable being a place where such cooperation could occur.
- (c) **anti-competitive contracts, arrangements understandings**: any contract, arrangement or understanding which has the purpose, effect or likely effect of substantially lessening competition.
- (d) **anti-competitive conduct (market power)**: any conduct by a company with market power which has the purpose, effect or likely effect of substantially lessening competition.
- (e) **collective boycotts**: where a group of competitors agree not to acquire goods or services from, or not to supply goods or services to, a business with whom the group is negotiating, unless the business accepts the terms and conditions offered by the group.

A contravention of the CCA could result in a significant fine (up to \$500,000 for individuals and more than \$10 million for companies). Cartel conduct may also result in criminal sanctions, including gaol terms for individuals.

Sensitive Information means and includes:

- (a) commercially sensitive information belonging to a Member's organisation or business (in this document such bodies are referred to as an Industry Stakeholder); and
- (b) information which, if disclosed, would breach an Industry Stakeholder's obligations of confidence to third parties, be against laws or regulations (including competition laws), would waive legal professional privilege, or cause unreasonable prejudice to the Coordinator of Energy or the State of Western Australia).

Guiding Principle - what not to discuss

In any circumstance in which Industry Stakeholders are or are likely to be in competition with one another a Member must not discuss or exchange with any of the other Members information that is not otherwise in the public domain about commercially sensitive matters, including without limitation the following:

- (a) the rates or prices (including any discounts or rebates) for the goods produced or the services produced by the Industry Stakeholders that are paid by or offered to third parties;
- (b) the confidential details regarding a customer or supplier of an Industry Stakeholder;
- (c) any strategies employed by an Industry Stakeholder to further any business that is or is likely to be in competition with a business of another Industry Stakeholder, (including, without limitation, any strategy related to an Industry Stakeholder's approach to bilateral contracting or bidding in the energy or ancillary/essential system services markets);
- (d) the prices paid or offered to be paid (including any aspects of a transaction) by an Industry Stakeholder to acquire goods or services from third parties; and
- (e) the confidential particulars of a third party supplier of goods or services to an Industry Stakeholder, including any circumstances in which an Industry Stakeholder has refused to or would refuse to acquire goods or services from a third party supplier or class of third party supplier.

Compliance Procedures for Meetings

If any of the matters listed above is raised for discussion, or information is sought to be exchanged in relation to the matter, the relevant Member must object to the matter being discussed. If, despite the objection, discussion of the relevant matter continues, then the relevant Member should advise the Chairperson and cease participation in the meeting/discussion and the relevant events must be recorded in the minutes for the meeting, including the time at which the relevant Member ceased to participate.

Energy Policy WA

Review of the Gas Services Information (GSI) Rules

GSI Rules Review Working Group (GSIRRWG)

Meeting 1 - 7 August 2025

Working together for a brighter energy future.

Meeting protocols

- Please place your microphone on mute, unless you are asking a question or making a comment
- Please keep questions relevant to the agenda item being discussed
- If there is not a break in discussion and you would like to say something, please 'raise your hand'
- Questions and comments can also be emailed to EPWA Energy Markets <u>energymarkets@deed.wa.gov.au</u>
 after the meeting
- The meeting will be recorded and minutes will be taken and published on the **GSIRRWG** web page
- Please state your name and organisation when you ask a question
- If you are having connection/bandwidth issues, you may want to disable the incoming and/or outgoing video

Agenda

Working group meeting 1

Welcome and introductions
Item 1: Purpose of this review
Item 2: Role of this working group
Item 3: Issues in the scope of this review
Item 4: Project timeline and next steps
Meeting close

Welcome and introductions

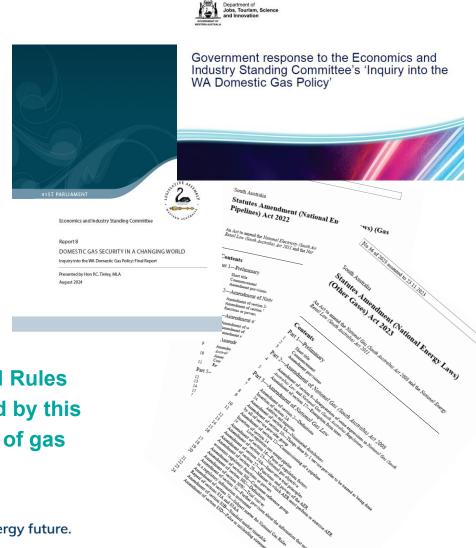


Purpose of this review

Two key drivers:

- Selected recommendations from the Inquiry into the WA Domestic Gas Policy: Final Report
- Proposed changes to the National Gas Law and National Gas Rules as they may apply in WA

This review will consider and recommend changes to the GSI Rules resulting from the above drivers, as well as other issues raised by this working group that may improve transparency and accuracy of gas volumes and available capacity in WA.



Role of this working group

Terms of reference sets out the roles and responsibilities, and ways of working within this group

This working group has been established to provide expert advice and analysis on all aspects of the review, including:

- assessing the GSI Rules in the context of the Inquiry's findings and Govt response
- ensuring consistency with provisions in the NGL and NGR in light of a proposal to adopt Parts 10 and 18A of the NGR in WA
- evaluating additional aspects of the rules that may require clarifications or amendments
- identifying and formulating proposals regarding any relevant changes to the GSI Rules
- providing analysis on the impact of any proposals on different stakeholder groups
- developing suitable Rule Change Proposals and drafting Amending Rules, if required

Recommendations from the Inquiry into the WA Domestic Gas Policy: Final Report, included in this review



Recommendation 15: That the State Government collaborate with the AEMO to review the GSI regime with reference to the recommendations made in chapter 5 of the report and taking into account other evidence presented in this report.

Recommendation 16: That the WA GSOO be expanded to cover a 20-year forecast period.

Recommendation 17: That the WA GSOO includes forecasts of the decarbonisation pathways for gas users, despite the difficulties associated with this.

Recommendation 23: That government policy-making in both gas and electricity explicitly recognise and allow for the integration of, and interdependencies between, the State's gas and electricity markets, including in the rules dealing with planning, forecasting and operations, and in particular recognising the importance of a secure point-in-time supply of gas for firming gas powered generation (GPG).

Proposed sections of NGR to be adapted for WA

Part 10: Prescribed Transparency Information

- This part outlines the requirements for transparency in gas markets, particularly regarding the publication of information by service providers. It includes rules about:
 - What **types of information** must be disclosed (e.g., pipeline capacity, usage, prices). (Note that prices are **NOT** in scope).
 - How and when this information should be published.
 - Obligations for service providers to ensure data accuracy and accessibility.
- The goal is to enhance market efficiency and competition by ensuring stakeholders have access to reliable and timely information.

Proposed sections of NGR to be adapted for WA

Part 18A: Non-Pipeline Infrastructure Terms and Prices

This part governs the **disclosure of terms and prices** for non-pipeline gas infrastructure, such as:

- Compression facilities
- Storage facilities
- LNG processing or regasification

It sets out rules for:

- How terms and prices must be published. (Note that prices are NOT in scope).
- The standardisation of access arrangements
- Transparency obligations similar to those in Part 10, but focused on non-pipeline assets

Alignment with recent reforms to the NGL and NGR related to transparency of information and reporting requirements

How can the GSI Rules evolve to ensure that relevant and accurate information is available in a way that supports efficient market function, minimises regulatory burden, and helps stakeholders make better-informed decisions?

Key areas to consider include:

- 1. Whether **disclosure of other types of data** related to Pipeline Operators, Storage Facility Operators and Production Facility Operators would **enhance market transparency.**
- 2. What **information** is necessary for current and potential market participants as well as the government, to support informed decision-making **in terms of adequacy of storage.**

Other issues raised by stakeholders that are considered to improve transparency and accuracy of gas volumes and available capacity in WA

Information on all onshore quantities

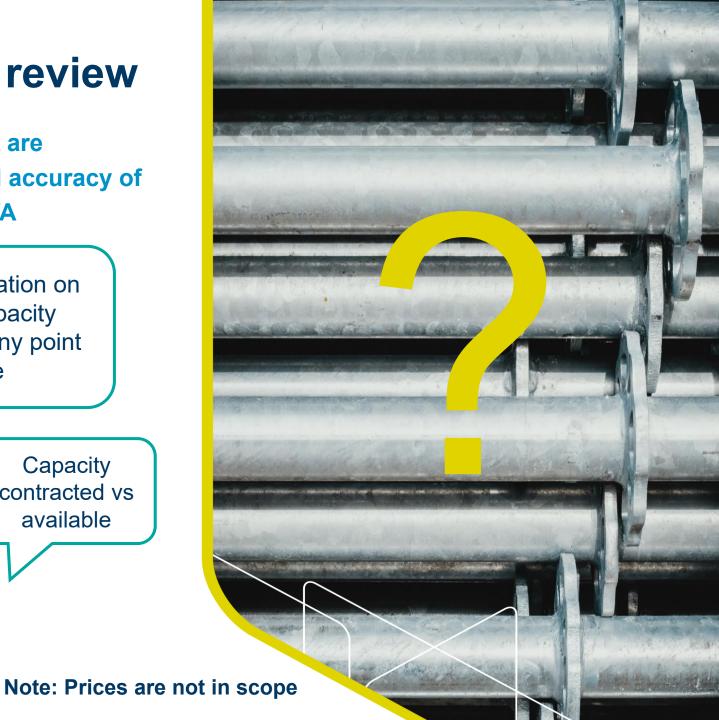
Better information on storage capacity available at any point in time

Accurate information on production capacity, not just nameplate

Capacity contracted vs available

GPG volumes, daily and peak information more

GSOO frequently



Key changes: Recommendations for the GSOO

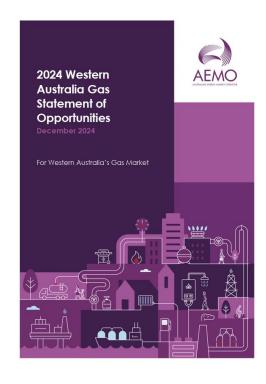
AEMO has started implementing recommendations, we need to support this with rules

Improvements in the 2024 WA GSOO included:

- Aligning the GSOO scenarios with the WEM ESOO scenarios
- Using the WEM ESOO supply outlook to inform SWIS GPG consumption
- Applying an emissions target to SWIS GPG consumption modelling to achieve net zero emissions by 2050
- Considering sectoral electrification and reduction in gas consumption by large users

Planned improvements in the 2025 WA GSOO:

- Extending the outlook to 20 years
- Expanded information requests that include the impact of decarbonisation pathways on gas demand



Are there any other changes we should consider to improve the GSOO, or do we just need to make the amendments to the GSI Rules that reflect the work AEMO is now doing?

Key changes: Recommendations for the GBB

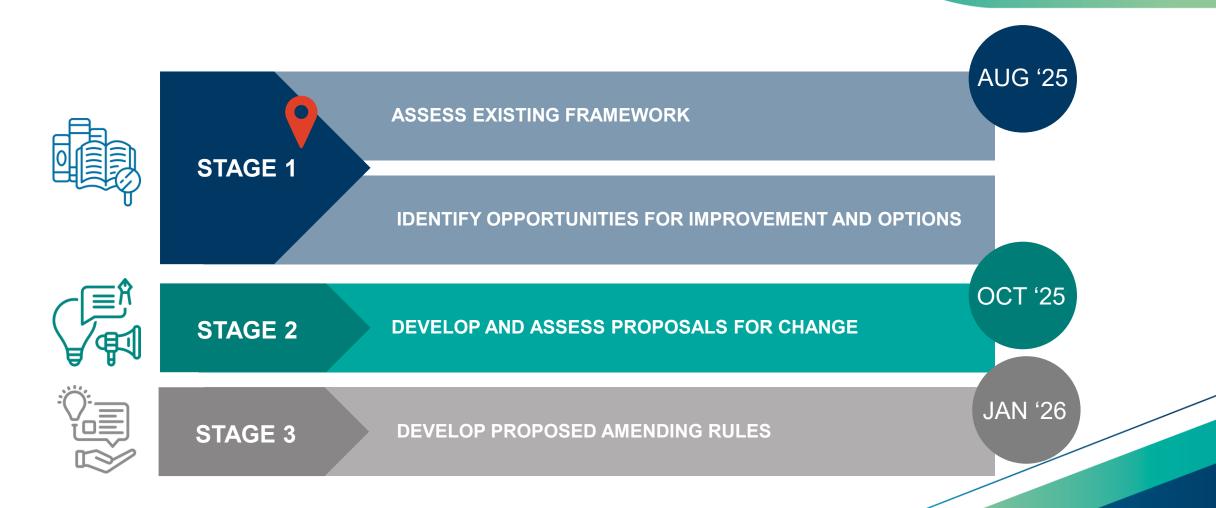
Inquiry recommendation 15 and changes to the NGR aim to improve transparency

What improvements should we consider to increase information transparency and accuracy for improved decision making?

- What clarifications do we need to make in the current GSI Rules (e.g. capacity outlooks for production facilities)?
- What information would be beneficial to publish in light of the national changes?
- There have been some concerns around accuracy of actual capacity reporting. What issues does this raise? What should be done about it?
- Is there information published in the GSOO or through the EMF that the market would benefit from by being published more frequently?
- Should we be publishing other information such as capacity used vs contracted, storage volumes in and out, GPG volumes (daily and peak) and total supply/demand? For what purpose? Over what horizon?
- What linkages between the GBB and WEM data dashboard would be beneficial?
- Would it be useful to map alternative fuel loads in WA to show opportunities for gasification?



Working group timeline and next steps



Thank you



Links to relevant information

Resources related to this review:

- GSI Review <u>Scope of Work</u>
- GSI Review Working Group <u>Terms of Reference</u>
- Inquiry into the WA Domestic Gas Policy: Final Report and Government Response
- NEL Other Gases Act
- NEL Gas Pipelines Act
- Relevant National Gas Rules
 - Part 10
 - Part 18A