

Meeting Agenda

Meeting Title:	Gas Service Information Rules Review Working Group (GSIRRWG)
Date:	Thursday 4 September 2025
Time:	10:00 AM – 12:00 PM
Location:	Online, via TEAMS

Item	Item	Responsibility	Type	Duration
1	Welcome and Agenda <ul style="list-style-type: none"> Conflicts of interest Competition Law 	Chair	Noting	3 min
2	Meeting Apologies/Attendance	Chair	Noting	2 min
3	Recap of meeting 1 and action items	Chair/ Point Global	Discussion	10 min
4	Proposals: Opportunities to improve the GBB	Point Global/Allan McDougall & David Rafferty	Discussion	65 min
5	Proposals: Opportunities to improve the GSOO	Point Global/AEMO	Discussion	10 min
6	Other issues / opportunities	Point Global	Discussion	20 min
7	Project timeline and next steps	Point Global	Discussion	5 min
8	General Business	Chair	Noting	5 min
	Meeting close: 12:00pm			

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 anti-competitive 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.



Review of the GSI Rules – the GSIRRWG – Action Items

Item	Date	Action	Responsibility	By when	Next Steps	Status
1	7 August 2025	<p>Develop a paper for working group meeting #2, discussing:</p> <ul style="list-style-type: none">• The benefit to gas market participants in reporting LNG exports versus domestic gas from specific facilities.• Potential rule change proposals setting out reporting requirements and frequency.	Mr. McDougall, Mr. Rafferty and Ms. Stankovic	25 August 2025	EPWA to circulate paper to members, to be discussed in meeting #2.	Closed - papers circulated to members 28 August 2025
2	7 August 2025	Mr. Gillespie to enquire with his team at AEMO regarding sufficiency of internal resources driving the current need for contracting consultants to complete the GSOO.	Mr. Gillespie	4 September 2025	To be discussed at working group meeting #2	Open

Item	Date	Action	Responsibility	By when	Next Steps	Status
3	7 August 2025	Circulate previous GAB papers from 2023 detailing discussion regarding the definition of Capacity Outlook, Medium Term Capacity Outlook and Nameplate Capacity.	Energy Policy WA	N/A	N/A	Closed – circulated to the members 13 August 2025
4	7 August 2025	Ms. Stone and Ms. Hobday to discuss Capacity Outlook v. Nameplate capacity and any need for clarifications to the rules to enable compliance, monitoring and enforcement.	Ms. Stone and Ms. Hobday	4 September 2025	EPWA to circulate papers to members, to be discussed at meeting #2.	Closed- papers circulated to members 28 August 2025
5	7 August 2025	Mr. Gillespie to enquire with his team around the process and potential requirements to align some information between the GBB and WEM data dashboard.	Mr. Gillespie	4 September 2025	To be discussed at working group meeting #2	Open
6	7 August 2025	Ms. Stone to outline the proposals for aligning the proposed sections of the NGL/NGR to be adapted in WA with the GSI framework.	Ms. Stone	28 August 2025	EPWA to circulate paper to members, to be discussed at meeting #2.	Closed- papers circulated to members 28 August 2025
7	7 August 2025	Mr. Gillespie to review the need for any clarifications to the	Mr. Gillespie	4 September 2025	To be discussed at working group meeting #2.	Open

Item	Date	Action	Responsibility	By when	Next Steps	Status
		Nominated and Forecast Flow Data.				
8	7 August 2025	Develop a paper for #2 working group meeting. <ul style="list-style-type: none"> Working group members to raise and/or clarify any additional opportunities for improvements for the GSOO and/or the GBB and provide a qualitative assessment of the resulting benefits. 	Working group members	25 August 2025	EPWA to circulate paper to members, to be discussed in meeting #2.	Open



Department of
Energy and Economic
Diversification

Energy Policy WA

Review of the Gas Services Information (GSI) Rules

GSI Rules Review Working Group (GSIRRWG)

Meeting 2

4 September 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 energymarkets@deed.wa.gov.au 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

Purpose of today's meeting

- To begin the discussion on proposed solutions (design proposals) to the issues identified in meeting 1, including;
 - Providing feedback on the suitability and feasibility of design proposals;
 - Identifying and providing feedback of cost implications of implementing the proposals; and
 - Identifying and providing feedback regarding the potential benefits for Gas Market Participants.

Agenda

GSIRRWG meeting 2

10:00 am **Welcome**

10:05 am **Recap of meeting 1 and actions items**

10:15 am **Proposals: Opportunities to improve the GBB**

11:20 am **Proposals: Opportunities to improve the GSOO**

11:30 am **Other issues/considerations to be discussed**

11:50 am **Project timeline and next steps**

12:00 noon **Meeting close**

Proposals: Opportunities to improve the WA GBB



Reporting of Liquefied Natural Gas (LNG) exports presented by Mr McDougall and Mr Rafferty

Transparency of LNG vs domestic gas



Illustrative table for transparency discussion

	Equity %	LNG supplied to 6 months to 30 Jun 2025 (PJ)	Domgas supplied to 6 months to 30 Jun 2025 (PJ)	Domgas %	LNG Supplied Inception to 30 June 2025	Domgas Supplied Inception to 30 June 2025	Domgas %	State Agreement Domgas commitment	End-of-field-life and Equity qty (PJ)	Days remaining to end-of-life	Average domgas now required(TJ per day)
Project name e.g. Gorgon	100%	3325	665	17%	5300	900	17%	2000	2056	3650	301
Company A	47.3%	1575	315	17%	2504	426	17%	946	973	3650	143
Company B	25.0%	830	166	17%	1500	225	17%	500	514	3650	75
Company C	25.0%	830	166	17%	1500	225	17%	500	514	3650	75
Company D	1.3%	40	8	17%	66	11	17%	25	26	3650	4
Company E	1.0%	35	7	17%	53	9	17%	20	21	3650	3
Company F	0.4%	15	3	17%	25	4	17%	8.4	9	3650	1.2

Clarifying capacity information requirements

Which numbers do we want, and for what purpose?

Facility A

100 TJ Nameplate

✓ Nameplate Capacity

- 20 TJ Outage ✗

Unplanned outages / trips could be reported

= 80 TJ MAX ✓

✓ Medium Term Capacity Outlook

↳ Contracted position:

40 TJ contracted

✗

Utilisation / availability could be reported

40 TJ spare capacity

↳

Daily availability:

50 TJ expected to be utilised

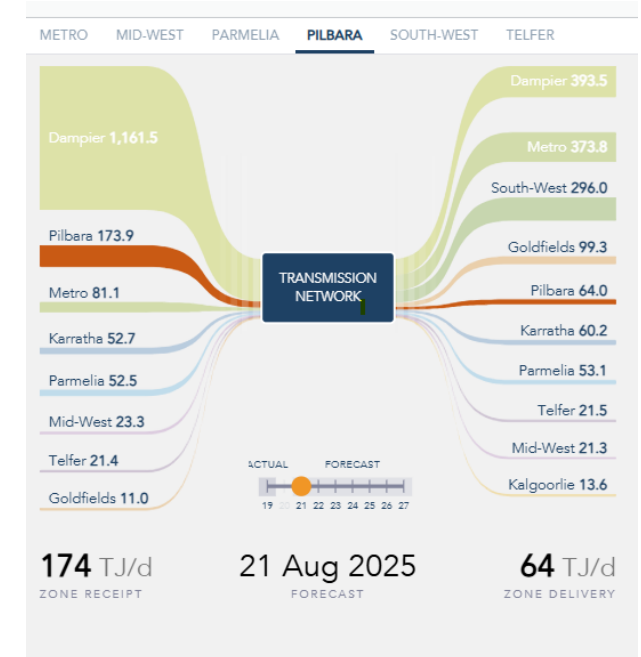
?

Capacity Outlook

30 TJ available

✗

Utilisation / availability could be reported



Definition of Capacity Outlook

Description of issue

- Producers providing Nameplate Capacity rather than an assessment of what will be transported / delivered
- GBB should provide a reasonable forecast of what gas will be available rather than what can theoretically be available
- This impacts the accuracy and validity of the GBB and is important in emergency scenarios

Benefits of addressing the issue

- Capacity Outlook provides a reasonable forecast, not just a statement of potential capacity (Nameplate Capacity)
- Improved GBB accuracy, provision of information about short term availability
- Accurate information during an emergency
- Enables effective compliance, monitoring and enforcement





Capacity Outlook means, for a Gas Day:

- (a) for a GBB Pipeline, the Registered Pipeline Operator's estimate of the quantities of natural gas that can be:
 - (i) transported through the pipeline; and
 - (ii) delivered at each Gate Station, on the Gas Day, based on knowledge of the Facility's capability and availability over that time (see rule 57);
- (b) for a GBB Storage Facility, the Registered Storage Facility Operator's estimate of the quantities of natural gas that can be:
 - (i) withdrawn from the storage facility for injection into GBB Pipelines; and
 - (ii) received by the storage facility and injected into storage, on the Gas Day, based on knowledge of the Facility's capability and availability over that time (see rule 65); and
- (c) for a GBB Production Facility, the Registered Production Facility Operator's estimate of the quantity of natural gas that can be injected from the Facility into GBB Pipelines on the Gas Day, based on knowledge of the Facility's capability and availability over that time (see rule 72).

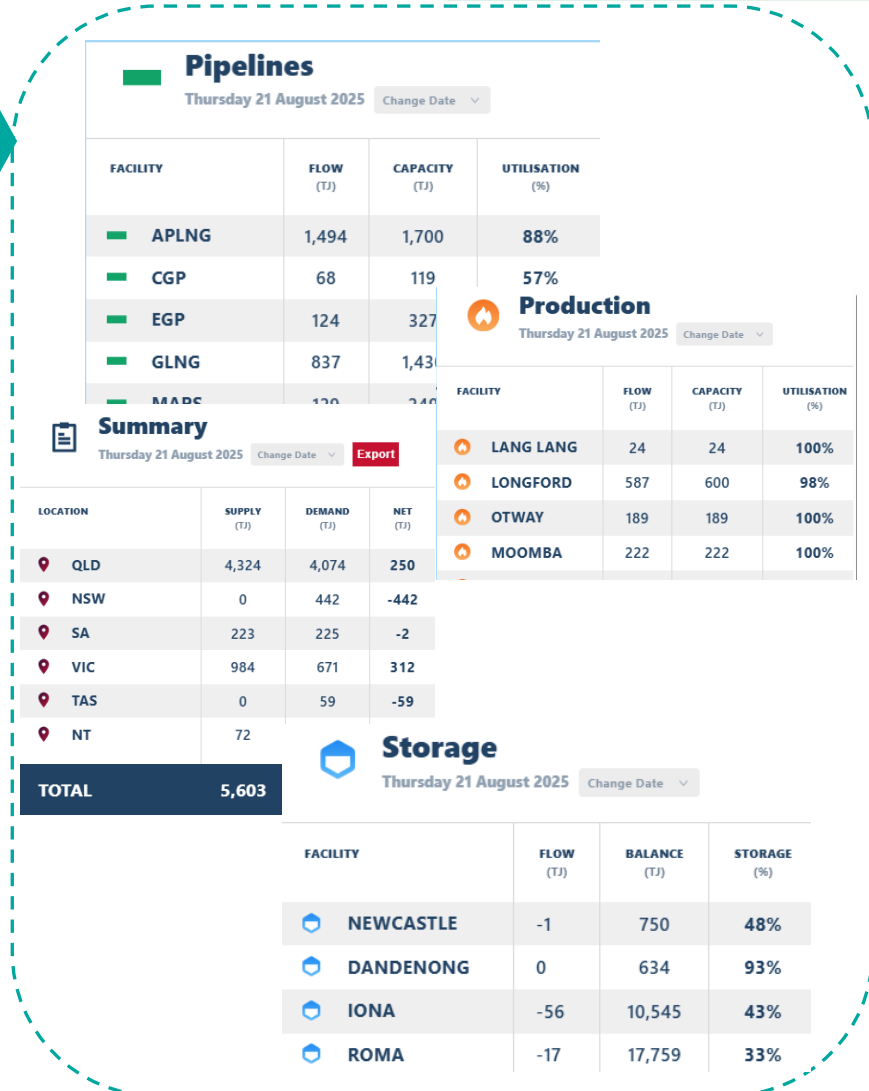
Proposal

- Clarify the intent of Capacity Outlook as a short-term estimate of what capacity is expected to be available by changing “can” (i.e. is able to be) to “will” or “expected to” (i.e. is intended to be)
- Broaden the basis of the estimate to include factors other than Facility-specific capability and availability (e.g. supply limitations) by changing to something akin to “expected operating conditions” (per NGR)
- Introduce a reasonableness test for the estimate

Other opportunities to improve the WA GBB

- 
 Adopt aspects of the East Coast GBB as the mechanism to deliver transparency and consistency
- 
 Include 'net consumption' of WA zones in addition to Total Receipt and Total Delivery to avoid confusion of gas that simply transitions through a zone – **Mr Gillespie to present**
- 
 Include information from WEM data dashboard on gas usage (e.g. forecast Gas Powered Generators (GPG) use, peak GPG use) - **Mr Gillespie to present**
- 
Considerations: What is the best information format? Are the reports usable? Is the information too disparate (e.g. MTCO for outages, nameplate elsewhere, forecast flows elsewhere)? Should it be presented in a different format e.g. visual vs table (report)?

What is AEMO's process for making changes to the GBB, are there any constraints and how do we get a view of the expected cost for some of these options?

Pipelines
Thursday 21 August 2025

FACILITY	FLOW (TJ)	CAPACITY (TJ)	UTILISATION (%)
APLNG	1,494	1,700	88%
CGP	68	119	57%
EGP	124	327	
GLNG	837	1,431	
MADE	120	240	

Summary
Thursday 21 August 2025

LOCATION	SUPPLY (TJ)	DEMAND (TJ)	NET (TJ)
QLD	4,324	4,074	250
NSW	0	442	-442
SA	223	225	-2
VIC	984	671	312
TAS	0	59	-59
NT	72		
TOTAL	5,603		

Production
Thursday 21 August 2025

FACILITY	FLOW (TJ)	CAPACITY (TJ)	UTILISATION (%)
LANG LANG	24	24	100%
LONGFORD	587	600	98%
OTWAY	189	189	100%
MOOMBA	222	222	100%

Storage
Thursday 21 August 2025

FACILITY	FLOW (TJ)	BALANCE (TJ)	STORAGE (%)
NEWCASTLE	-1	750	48%
DANDENONG	0	634	93%
IONA	-56	10,545	43%
ROMA	-17	17,759	33%

Information transparency



NGR information disclosure obligations and market transparency requirements

Objective: To ensure that any new reporting obligations under the GSI Rules are consistent with the obligations under the new sections of the NGL being proposed for adoption in WA

Part 10: Prescribed Transparency Information

Outlines requirements for transparency in gas markets, including the publication of information by service providers:

- What types of information must be disclosed (e.g., pipeline capacity, usage, pricing).
- 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.

Part 18A: Non-Pipeline Infrastructure Terms and Prices

Governs the terms and pricing for non-pipeline gas infrastructure, such as:

- Compression facilities
- Storage facilities
- LNG processing or regasification

It sets out rules for:

- How prices and terms must be published.
- The standardisation of access arrangements.
- Transparency obligations similar to those in Part 10 but focused on non-pipeline assets.

The latest version of the National Gas Rules (Version 85, dated 29 May 2025) available from the

[AEMC Energy Rules Portal](#)

Reminder: Prices are NOT in scope in the context of this Review



Current information provisions in the GSI Rules

Description of issue

The GSI Rules provides information on:

- ✓ What information needs to be provided
- ✓ How that information needs to be provided
- ✓ Who that information needs to be provided to
- ✓ When the information needs to be provided

The GSI Rules doesn't provide information on:

- ✗ What level of accuracy is expected / required
- ✗ What is considered reasonably accurate
- ✗ Obligations around confidential information

Considerations/discussions

- What constitutes confidential and public information
- Adoption of principles from the NGR / NGRWA information standard in a modified format (**see appendix**)
- The need for relevant parts of GSI Rules to clarify that a duty of confidence is not a valid reason for non-compliance

Proposals: Opportunities to improve the WA GSOO

2024 Western Australia Gas Statement of Opportunities

December 2024

For Western Australia's Gas Market



Internalising WA GSOO forecasting

Description of issue

- Using external consultants to develop GSOO forecasts means those consultants may be privy to confidential information
- Working groups members highlighted there have been various examples of this over recent years
- Working group members considered AEMO should have sufficient resources, skills and expertise that it can fulfil its functions using internal resources

Benefits of addressing the issue

- Confidential information should not be able to be used/ perceived to be used in commercial negotiations
- Confidence that information is only being used for the intended purpose (long-term forecasting)
- Removed reliance on third parties, reduced risk

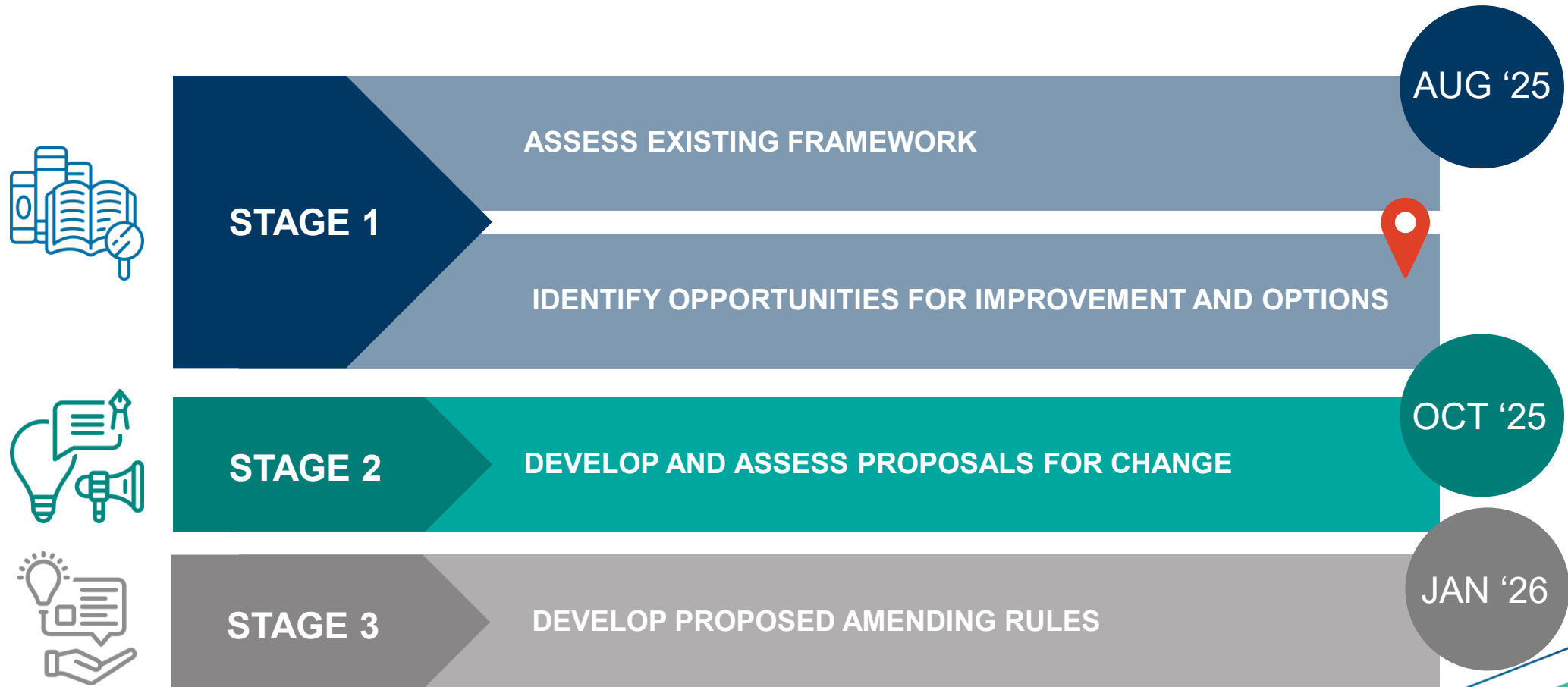
Considerations/discussion

- Presented by Mr Gilliespie

**Any other issues /
opportunities we should
discuss?**



Working group timeline and next steps



Appendices



Department of
Energy and Economic
Diversification

Information transparency principles from the NGR

NGR

Division 2 Obligations on service providers

Subdivision 1 Information disclosure requirements

101 Access information standard

- (1) A service provider required by this Division to prepare, publish and maintain information must do so in accordance with the *access information standard*.

Note

This subrule is classified as a tier 1 civil penalty provision under the National Gas (South Australia) Regulations. See clause 6 and Schedule 3 of the National Gas (South Australia) Regulations.

- (2) The *access information standard* is the requirement that information:
 - (a) is not false or misleading in a material particular; and
 - (b) in relation to information of a technical nature, is prepared, published and maintained in accordance with the practices, methods and acts that would reasonably be expected from an experienced and competent person engaged in the ownership, operation or control of a pipeline in Australia acting with all due skill, diligence, prudence and foresight; and
 - (c) in relation to a forecast or estimate:
 - (i) is supported by a statement of the basis of the forecast or estimate; and
 - (ii) is arrived at on a reasonable basis; and
 - (iii) represents the best forecast or estimate possible in the circumstances.
- (3) If a service provider becomes aware that information required to be published by it under this Division does not comply with the *access information standard* or any other provision of this Division, or is no longer accurate, the service provider must publish information that does comply, or is accurate, as soon as practicable after the service provider becomes aware of the non-compliance or inaccuracy.

Note

This subrule is classified as a tier 1 civil penalty provision under the National Gas (South Australia) Regulations. See clause 6 and Schedule 3 of the National Gas (South Australia) Regulations.

- (4) Information published under this Division must include the date of publication, the date to which the information is current and, if the information replaces an earlier version as provided for by subrule (3), notice of that fact.

Current NGRWA

112B Access information standard

- (1) A service provider required by rules 112C and 112D to prepare, publish and maintain information must do so in accordance with the access information standard.
- (2) The **access information standard** means that the information:
 - (a) is not false or misleading in a material particular;
 - (b) in relation to information of a technical nature, is prepared, published and maintained in accordance with the practices, methods and acts that would reasonably be expected from an experienced and competent person engaged in the ownership, operation or control of a pipeline in Australia acting with all due skill, diligence, prudence and foresight; and
 - (c) in relation to a forecast or estimate, is supported by a statement of the basis of the forecast or estimate and:
 - (i) is arrived at on a reasonable basis; and
 - (ii) represents the best forecast or estimate possible in the circumstances.
- (3) Where a service provider becomes aware that information required to be published by it under rules 112C and 112D does not comply with the access information standard or rules 112C and 112D, the service provider must publish information that does comply as soon as practicable after the service provider becomes aware of the non-compliance.
- (4) Information published under rules 112C and 112D must include the date of publication, the date to which the information is current and, if the information replaces an earlier version as provided for by subrule (3), notice of that fact.

NGR

100B Person cannot rely on duty of confidence to avoid compliance with Part

- (1) A person must not refuse to comply with this Part on the ground of any duty of confidence.
- (2) A person incurs, by complying with this Part, no liability for breach of contract, breach of confidence, or any other civil wrong.

Reminder - Purpose of this review

Two key drivers:

1 Select recommendations from the Inquiry into the WA Domestic Gas Policy: Final Report

2 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.



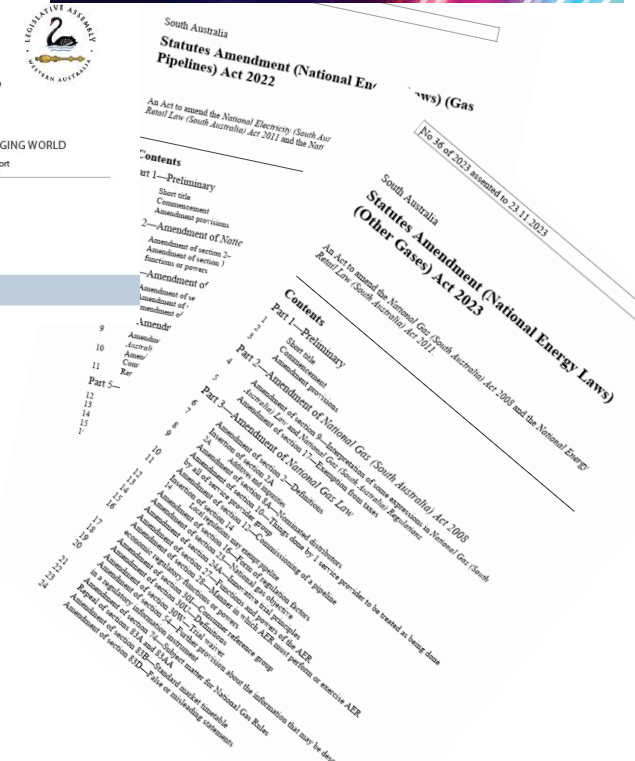
Government response to the Economics and Industry Standing Committee's 'Inquiry into the WA Domestic Gas Policy'



Economics and Industry Standing Committee

Report 8
DOMESTIC GAS SECURITY IN A CHANGING WORLD
Inquiry into the WA Domestic Gas Policy: Final Report

Presented by Hon PC, Tinley, MLA
August 2024



Reminder - Issues in scope of this review

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



Workshop focus

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.

AEMO precedence and underway – integration into rules

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 GPG.



Reminder - Issues in scope of this review

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.

Reminder - Issues in scope of this review

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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

Links to relevant information

Resources related to this review:

- GSI Review [Scope of Work](#)
- GSI Review Working Group [Terms of Reference](#)
- [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](#)

WA GBB transparency and alignment

Adopt aspects of the East Coast GBB as the mechanism to deliver transparency and consistency

Storage

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<https://www.aemo.com.au/energy-systems/gas/gas-bulletin-board-gbb/data-gbb/interactive-map-gbb>