



## Gas Services Information Rules Review Working Group (GSIRRWG) - Minutes

<b>Date:</b>	7 August 2025
<b>Time:</b>	1:30pm – 3:25pm
<b>Location:</b>	Microsoft Teams online

Attendees	Representing in GSIRRWG	Comment
Dora Guzeleva	Chair, Energy Policy WA (EPWA)	
Jean Mileto	Alinta Energy	Proxy for Aiko Ueno
Jack Rowe	APA Group	
Alex Gillespie	Australian Energy Market Operator (AEMO)	
Frances Hobday	Economic Regulation Authority (ERA)	
Allan McDougall	Gas Trading Australia	
Herman Prinsloo	Horizon Power	
David Rafferty	Jera Australia	
Tessa Liddelow	Shell Energy	
Ana Stankovic	Woodside Energy	
Other attendees	From	Comment
Franchesca Walker	EPWA	Attending to provide context on the integration of the National Gas Law in WA
Sanna Pember	EPWA	GSIRRWG Secretariat
Rory Hannon	EPWA	GSIRRWG Secretariat
Apologies	From	Comment
Aiko Ueno	Alinta Energy	Jean Mileto attending as proxy
Brian Pridgen	Australian Energy Producers	
Vivek Karia	Department of energy and Economic Diversification	



## 1. WELCOME

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The Chair opened the meeting with an Acknowledgement of Country and welcomed members.

The Chair noted the Competition and Consumer Law obligations of the GSIRRWG members, inviting members to bring to her attention any issues should they arise.

## 2. MEETING APOLOGIES AND ATTENDANCE

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The Chair noted the attendance as listed above.

## 3. WELCOME AND INTRODUCTIONS

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The Chair invited each of the working group members to briefly introduce themselves.

## 4. PURPOSE OF THIS REVIEW

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The Chair provided a summary of the two key drivers for this review: the five recommendations of the Inquiry into the WA Domestic Gas Policy, which were supported by the State Government, and the reforms to the National Gas Law (NGL) and National Gas Rules (NGR) as they may apply in Western Australia (**slide 5**).

Ms Walker summarised the NGL reforms, Part 10 and Part 18A of the NGL, that Western Australia is considering for adoption. She explained that the NGL and NGR that currently apply in WA are different to those that apply in every other participating jurisdiction and that amendments that are made to the NGL are not automatically adopted in WA.

She clarified that:

- The Gas Network Regulation team at EPWA and the Parliamentary Counsel's Office are currently drafting legislative instruments to adopt the [Statutes Amendment \(National Energy Laws\) \(Other Gases\) Act 2023](#) (Other Gases Package) in WA and public consultation is anticipated to take place in the next couple of months.
- This will amend WA's version of the National Gas Law (NGLWA).
- The reforms to the NGL and the NGR aim to facilitate the establishment of a simpler regulatory framework to support the safe, reliable and efficient use of and investment in gas pipelines.

The Chair emphasised the importance of ensuring that outcomes of the GSI Rules Review align with NGL or NGR changes to be adopted in WA, to facilitate the consistency and the efficiency of information collection and reporting provisions.

She added that the purpose of this review is also to evaluate additional aspects of the rules that may require clarifications and encouraged working group members to raise such matters.

## 5. ROLE OF THIS WORKING GROUP

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The Chair presented **slide 6**. She noted that this working group was established by the Gas Advisory Board (GAB) to assist with the review.

## 6. ISSUES IN SCOPE OF THIS REVIEW

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The Chair clarified that recommendations 15-17 and 23 from the Inquiry into the WA Domestic Gas Policy: Final Report, are in scope for this review. She noted that recommendation 15 is an overarching recommendation with the objective to consider proposals to improve the GSI regime.

Ms Stone noted that since publication of the Inquiry report, AEMO has implemented the recommendations related to the WA Gas Statement of Opportunities (GSOO).

- Mr Gillespie presented **slide 12**. He noted that AEMO has taken the following actions to address the inquiry's recommendations. AEMO:
  - ensured that AEMO's Electricity Statement of Opportunities (ESOO) outlook for Gas Powered Generation (GPG) consumption was included in the Inputs Assumptions and Scenarios Report (IASR), to recognise the interdependence between the two markets and the role that GPG will play in decarbonisation;
  - used its 2023 IASR to generate the 2024 GSOO, aligning it with the assumptions used in the ESOO;
  - developed further the decarbonisation pathways for gas users in the 2025 IASR , including with updates to multi-sectorial modelling, carbon sequestration, hydrogen use and electrification.
- Mr Gillespie added that for the 2025 GSOO, the outlook will be increasing from 10 to 20 years, addressing the relevant inquiry's recommendation. Information gathered from participants to inform the GSOO has also been expanded to cover questions around decarbonisation, energy efficiency gains as well as carbon capture and storage (CCS) pathways.
- Mr Gillespie noted that, following the closure of the information gathering phase of the 2025 GSOO, there may be improvements to be made to the information requests portion of the GSI Rules.

The Chair indicated that one of the purposes of this review is to review and amend the GSI Rules in response to the Inquiry's recommendation pertaining to the GSOO. For example, the current GSI Rules only require AEMO publish a 10-year outlook in the GSOO, and this should be changed to align with the inquiry's recommendations and the practical changes AEMO is already making.

Ms Stone asked members to provide any further suggestions for improvements to the GSOO.

- Mr McDougall suggested that facilities could report on their sales of Liquefied Natural Gas (LNG) exports versus their sales of domestic gas, tracking their performance against the Domestic Gas Reservation Policy, noting that such reporting would be a rough indicator or benchmark.
- He also noted his concern regarding the amount of gas supply/consumption unaccounted for on the Gas Bulletin Board (GAB) on a day-to-day basis over the last 12 months and that improvements must be made to information reporting and overall market transparency. He added that he had already raised this issue with the GAB.

The Chair responded that the latter concern is in the process of being resolved.

- Mr McDougall noted his frustration with the time taken to resolve these issues and that this is inconsistent with principles that underpin the GSI framework.

Ms Stone questioned if any GSI Rules needed to be amended to address these issues.

Chair confirmed that this is not the case and that the current rules are sufficient.

The Chair noted that Mr McDougall's proposal to report percentages of LNG exports and domestic gas from specific facilities is not currently in the GSI Rules. She added that it is her understanding that the Department of Energy and Economic Diversification (DEED) will be reporting on performance against domestic gas obligations.



She added that a representative from DEED, Mr Karia, is a working group member but was an apology for today. She suggested discussing this matter at the next meeting, when Mr Karia could provide input from DEED's perspective.

The Chair invited working group members to respond to Mr McDougall's proposal.

- Mr Rafferty stated that he agreed with much of Mr McDougall's sentiment, but he was unsure if reporting LNG exports vs domestic gas sales at a facility level would have the intended effect. His concern was that, because most facilities operate on an equity sale basis, tracking the performance of participants against their domestic gas obligations may be inaccurate.
- Mr Rafferty also noted that, for such a metric to be accurate, it would have to be reported at an equity level, rather than on a joint venture basis.
- Mr McDougall clarified that the intent of his proposal was to be by seller or marketer, noting that he is open to inputs from the working group.

The Chair noted that Mr McDougall and Mr Rafferty seemed to be broadly in agreement and suggested that they solidify their proposal and bring it to the next meeting.

- Mr McDougall clarified that the information must be broken down by facility, as different facilities have different obligations, as well as broken down by producer for that facility.

Ms Stone asked how frequent the reporting requirement should be.

- Mr Rafferty clarified that currently the reporting requirement is annually, and this should be the minimum requirement.
- Mr McDougall suggested monthly, like the tracked LNG requirement.
- Mr Rafferty responded that this would not be feasible. He emphasised the importance of considering the benefit such a requirement would bring versus the additional work.

Ms Stone requested the rationale for requiring more granular/timely data.

- Mr McDougall suggested that the reporting requirement should be monthly but recognised there may be challenges to this frequency.
- Mr Prinsloo acknowledged that both Mr McDougall's and Mr Rafferty's rationale made sense and suggested that such a requirement could be introduced first on an annual basis but with flexibility to reduce this timeframe if there is a need for this.

The Chair noted that any proposal must consider its costs and benefits, accounting for AEMO's effort in collecting information and maintaining the GBB and GSOO.

- Ms Stankovic noted that in the development of such an obligation the potential impact on the market should be considered. She stated that, should the domestic gas market be oversupplied at any one point in time, the ratio of domestic gas against LNG exports would dip through no fault of the producer.
- Mr McDougall clarified that this should be a percentage reporting that can fluctuate over, maybe, a two-year retrospective outlook.

The Chair emphasised that importance of market transparency but added that any proposal must have a clear benefit.

***ACTION: Mr McDougall, Mr Rafferty and Ms Stankovic to develop a paper for the next working group meeting, including:***

- ***The benefit to gas market participants in reporting LNG exports versus domestic gas sales from specific facilities; and***



**- Potential rule change proposals setting out reporting requirements and frequency.**

Ms Stone invited working group members to provide any other proposals for potential improvements to the WA GSOO.

- Mr Rafferty stated that AEMO's use of external consultants for the formulation of the GSOO meant that these consultants have access to confidential market information, giving them inside knowledge when working for buyers and/or sellers. He questioned why it is not possible for AEMO to produce the GSOO with internal resources only.
- Mr Prinsloo agreed with Mr Rafferty.
- Mr Gillespie responded that he would take this feedback back to his team at AEMO.

The Chair noted that this review must also consider what constitutes confidential and public information.

***ACTION: Mr Gillespie to enquire with the relevant team at AEMO whether the GSOO can be completed with internal resources only, avoiding the current use of external consultants.***

Ms Stone presented **slide 13**. She invited inputs from working group members.

- Mr McDougall noted that within the industry there is a varying degree of understanding of the definitions of Nameplate Capacity, Capacity Outlook and Medium Term Capacity Outlook. He noted that:
  - there could be value in revisiting the definition of these terms in the GSI Rules and ensuring they are as clear as possible.
  - having a better understanding of Medium Term Capacity Outlook could assist buyers in procuring gas on a short timeframe / near term, if necessary.
  - having clear definitions would also assist with compliance monitoring and enforcement of the relevant clauses.

The Chair noted that EPWA has provided the GAB with its interpretation of the relevant provisions/definitions and that this was supported by the GAB. She added that this interpretation may not have been accepted by all market participants.

She agreed with Mr McDougall that there is value in clarifying this part of the GSI Rules.

***ACTION: Ms Stone and Ms Hobday to discuss the provisions related to Capacity Outlook, Medium Term Capacity Outlook and Nameplate Capacity and any need for clarifications to the rules to facilitate compliance monitoring and enforcement.***

***ACTION: EPWA to circulate previous GAB papers from 2023 providing an interpretation of the definitions of Capacity Outlook, Medium Term Capacity Outlook and Nameplate Capacity.***

- Mr McDougall added that the definition of Large User Facility should also be clarified so that AEMO collects information from all the relevant parties in the market. In response to a statement by the Chair, he agreed that perhaps this was a compliance issue but considered that the definition should still be reviewed.
- Mr Rafferty noted the complexity regarding the definition of spare capacity associated with equity partners and that this may create challenges in determining who should be responsible for data reporting or potential non-compliances.

- Mr McDougall replied that all parties involved could be responsible but that he recognises the need for a practicable solution.

The Chair noted that the term "Large User Facility" relates to the physical infrastructure and not necessarily to the commercial arrangements.

- Mr Rafferty clarified that Mr McDougall's point may be that certain export facilities are receiving gas through the pipeline network, and that this is currently not included in the reported information. This leads to a distortion in the reported data, and this gap needs to be addressed.

The Chair noted that the issue appears to be reporting compliance rather than with the definition itself.

Ms Stone noted that the first step should be to determine whether the issue is with the definitions or a matter of compliance and enforcement. She agreed to include this matter in her discussion with Ms Hobday.

Ms Stone opened the discussion on improving the GBB.

Ms Stone suggested that further information on storage facilities, pipeline capacity and contracted pipeline capacity may be of interest to members.

- Mr McDougall agreed adding that, as a market participant who contracts for pipeline as well as storage capacity, knowing where, when and how much capacity is available, is of great interest.
- Mr McDougall clarified his position by adding that daily reporting of GPG demand, as well as pipeline capacity and storage capacity on a monthly or quarterly basis, would be the most useful and practical approach.

Ms Stone asked Mr Gillespie to confirm if the Wholesale Electricity Market (WEM) Data Dashboard was hosted through a separate system to the GBB and if there was any opportunity to integrate or use information from one to better inform the other.

- Mr Gillespie confirmed that the platforms were separate. He noted that he would consult with the team at AEMO to determine what changes could be made easily to the current infrastructure, and which may require a more detailed cost benefit analysis to determine if they're worthwhile.

***ACTION: Mr Gillespie to enquire with the AEMO team around the potential changes necessary to align GPG information between the GBB and WEM data dashboard.***

Ms Stone asked what kind of additional storage information would be of interest and how frequently it would need to be reported to be useful.

- Mr McDougall stated that daily ins and outs for each storage facility would be useful and forecast values would be of particular interest. He added that daily nominations for storage quantities are scheduled already, so this data would be available to storage facility operators.
- Mr Rafferty responded that this kind of information would only be useful to participants if a storage facility's net export/import positions from the pipeline is also available. He added that care should be taken in developing such a rule, but that he was generally supportive of the proposal.
- Mr McDougall noted that, upon looking at the GBB, he had realised that Storage Capacity Outlook and Nominated and Forecast Flows are already reported, although a more detailed forecast could still provide further value.

- Mr Rowe indicated that anything up to a week in advance could represent an accurate forecast for a storage facility for the purposes of the GBB, but that beyond this the numbers will be considerably less reliable.
- Mr McDougall responded that even a day ahead would be beneficial.
- Regarding the Nominated and Forecast Flow Data, Mr McDougall noted that the market needs more accurate information for gas passing from one pipeline to the next or from one zone to the next, and that there appears to be double and triple counting in this space.

Ms Stone requested that Mr Gillespie add this issue to the AEMO action list.

***ACTION: Mr Gillespie to review the need for any clarifications to the Nominated and Forecast Flow Data to avoid double counting of gas flows.***

The Chair noted that an objective of this review is 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.

Ms Stone replied that she intended to come to the next meeting with an outline of the proposals related to the potential adoption of the NGL provisions, and test these with the group to ensure that they can be implemented and are of use to participants.

***ACTION: Ms Stone to outline the proposals for aligning the sections of the NGL/NGR, proposed to be adapted in WA, with the GSI framework.***

- Mr McDougall suggested that producers reporting on capacity under firm contracts at their facilities would be useful to the market.
- Mr Rafferty responded that Jera typically goes to the market with any spare capacity they have available, but perhaps this wasn't representative of every producer in the market.
- Mr McDougall clarified that having more visibility of the size and length of producer contracts would assist buyers in procuring quantities, increasing market efficiency.
- Mr Rafferty agreed that such information could be useful, adding that buyers could also report on contracted capacity from facilities, further increasing transparency.
- Mr McDougall agreed with this.

The Chair questioned how such information could be verified, as appropriate compliance and monitoring protocols need to exist for such an obligation to be enforceable.

- Mr McDougall suggested independent audits could verify sale/purchase contracts.

The Chair noted that the issues related to contracts and their expiry dates may be addressed by the new provisions introduced under the National Gas Regulations.

Ms Walker clarified that:

- the east coast GBB has week ahead forecasts for capacity at storage facilities.
- contracts' prices and capacity will be reported under part 18A.
- Mr Prinsloo provided his support for the proposal on visibility of capacity available to be contracted and added that this would be beneficial for procurement strategies.
- Mr McDougall enquired about Horizon Power's position on contracted quantities.
- Mr Prinsloo responded that this information is already reported as part of the GS00.
- Mr Rafferty responded that these figures are aggregated and not available at a granular level.



- Mr Rafferty noted that contracted gas quantities can change rapidly, which could introduce inaccuracies in reporting. He emphasised that the timing of such reporting would need to be carefully considered when developing the proposal.

Ms Stone recapped the review timeline on **slide 14**.

The Chair noted that a separate action list will be circulated to the members.

- Mr Rafferty emphasised the importance for anyone presenting refined proposals to the working group at the next meeting to make their best effort to present the tangible benefits of their proposal. He expressed concern around the potential costs of the proposals' implementation and ongoing systems' maintenance, and the potential enforcement in instances of non-compliance.

Ms Stone agreed and urged members to provide assessment of both the benefits and the costs of their proposals, so that the working group could come to well measured conclusions.

***ACTION: 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 costs and benefits of their proposals.***

- Mr McDougall asked the Chair to clarify to what extent the outcomes of the Domestic Gas Inquiry would inform this review moving forward.

The Chair explained that recommendation 15 is for the Government to review the GSI Rules in line with the outcomes of the inquiry. She added that any proposed changes must still be consistent with the GSI Objectives and will be subject to consideration of their costs and benefits.

**The meeting closed at 3:25pm.**