

Meeting Agenda

Meeting Title:	Gas Service Information Rules Review Working Group (GSIRRWG)
Date:	Thursday 25 September 2025
Time:	9:30 AM – 11:30 AM
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	Action items	Chair	Noting	5 min
4	Summary of proposed policy proposals	Point Global	Discussion	15 min
5	Policy proposals to clarify <ul style="list-style-type: none"> a) Reporting of LNG exports b) Opportunities to improve the WA GBB 	Point Global	Discussion	40 min
6	New items to be discussed <ul style="list-style-type: none"> a) Transparency of ERA investigations b) NGR 'other gases' provision 	Point Global	Discussion	30 min
7	Items we are clear on <ul style="list-style-type: none"> a) Clarity on definitions b) Improving consistency with provisions in the NGL c) Formalising improvements to the GSOO 	Point Global	Discussion	20 min
8	Project timeline and next steps	Chair/Point Global	Discussion	5 min
	Meeting close: 11:30am			

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 Sept. 2025	To be discussed at working group meeting #2	Closed at working group meeting #2

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 Sept. 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, assessing costs and benefits before reporting back.	Mr. Gillespie	4 Sept. 2025	To be discussed at working group meeting #3	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 Nominated and Forecast Flow Data.	Mr. Gillespie	4 Sept. 2025	To be discussed at working group meeting #2.	Closed at working group meeting # 2

Item	Date	Action	Responsibility	By when	Next Steps	Status
8	7 August 2025	<p>Develop a paper for #2 working group meeting.</p> <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.	Closed at working group meeting # 2
9	4 Sept. 2025	<p>Mr Karia to provide working group members with;</p> <ol style="list-style-type: none"> WA Domestic Gas Statement Clarification on the additional information DEED requested from producers this year, including enhancements DEED will make to the WA Domestic Gas Statement, regarding LNG vs Domgas information. 	Mr Karia	16 Sept. 2025	EPWA to circulate paper to members, to be discussed in meeting #3.	<ol style="list-style-type: none"> Closed, circulated to members during meeting #2 Closed, circulated to members 10 September 2025
10	4 Sept. 2025	Working group members to review the current published WA Domestic Gas Statement and provide feedback on any information gaps.	Working group members	16 Sept. 2025	EPWA to circulate paper to members, to be discussed in meeting # 3.	Open

Item	Date	Action	Responsibility	By when	Next Steps	Status
11	4 Sept. 2025	<p>Further discussions/review of the definitions for Capacity Outlook, Nameplate Capacity, and Medium Term Capacity Outlook.</p> <p>Any need for clarifications to the rules to enable compliance, monitoring, enforcement, and consistent reporting for these definitions.</p>	Point Global/EPWA/ Ms Hobday	16 Sept. 2025	EPWA to circulate paper to members, to be discussed in meeting # 3.	Closed
12	4 Sept. 2025	<p>Improvement to the WA GBB – Wish list</p> <p>Working group members to suggest metrics/graphics from the East Coast GBB that would be useful if replicated on the GBB.</p>	Working Group members	16 Sept. 2025	EPWA to circulate paper to members, to be discussed in meeting #.3 with AEMO to assess these additions on a case-by-case basis.	Open
13	4 Sept. 2025	<p>Improvements to the WA GBB</p> <p>Mr Gillespie and his team at AEMO to review the East Coast GBB and member’s Wish List for items that could improve the WA GBB, categorising them by cost impact and required effort.</p>	Mr Gillespie	25 Sept. 2025	To be discussed at working group meeting #3	Open
14	4 Sept. 2025	Mr Moerch to review the proposed Nation Gas Law (NGL) reporting amendments against GBB obligations and advise if	Mr Moerch	16 Sept. 2025	EPWA to circulate paper to members, to be discussed in meeting # 3	Closed

Item	Date	Action	Responsibility	By when	Next Steps	Status
		digital links to GBB-hosted information meet NGL requirements.				
15	4 Sept. 2025	Mr Gillespie to enquire with his team at AEMO about providing Market Participants with a free text field when reporting on Seven Day Capacity Outlook.	Mr Gillespie	16 Sept. 2025	EPWA to circulate paper to members, to be discussed in meeting # 3	Open
16	4 Sept. 2025	Working group members to provide input on how the GBB and broader GSI framework can account for 'other gases' and address the timing and complexity of expanding these reporting requirements.	Working Group Members	16 Sept. 2025	EPWA to circulate paper to members, to be discussed in meeting # 3	Open
17	4 Sept. 2025	For proposals submitted by working group members, each proposal should clearly state its purpose and expected benefits.	Working Group Members	16 Sept. 2025	EPWA to circulate paper to members, to be discussed in meeting # 3	Open



Department of
Energy and Economic
Diversification

Energy Policy WA

Review of the Gas Services Information (GSI) Rules

GSI Rules Review Working Group (GSIRRWG)

Information Pack

Meeting 3 - 25 September 2025

Working together for a
brighter energy future.

Purpose of this information pack

- 1 Allows members to be prepared for the Stage two final working group meeting (#3) during which we will finalise the discussion on proposed policy proposals.
- 2 Identifies remaining gaps / outstanding items for discussion and proposed solution.
- 3 Captures outcomes of meetings and recommendations to date (see appendix).

Note: It is not intended to use the workshop to run through this information pack. Issues requiring further discussion will be addressed by exception. Pre-reading and thinking should be completed.

This meeting will be used to close all issues and finalise the discussion on the policy proposals for inclusion in the draft Consultation Paper.

Agenda

Working group meeting 3

9:30 am **Welcome**

9:35 am **Item 1: Summary of proposed policy proposals**

9:55 am **Item 2: Policy proposals to clarify**

10:35 am **Item 3: New items to be discussed**

11:05 am **Item 4: Items we are clear on (discussed by exception)**

11:25 am **Item 5: Project timeline and next steps**

11:30 am **Meeting close**

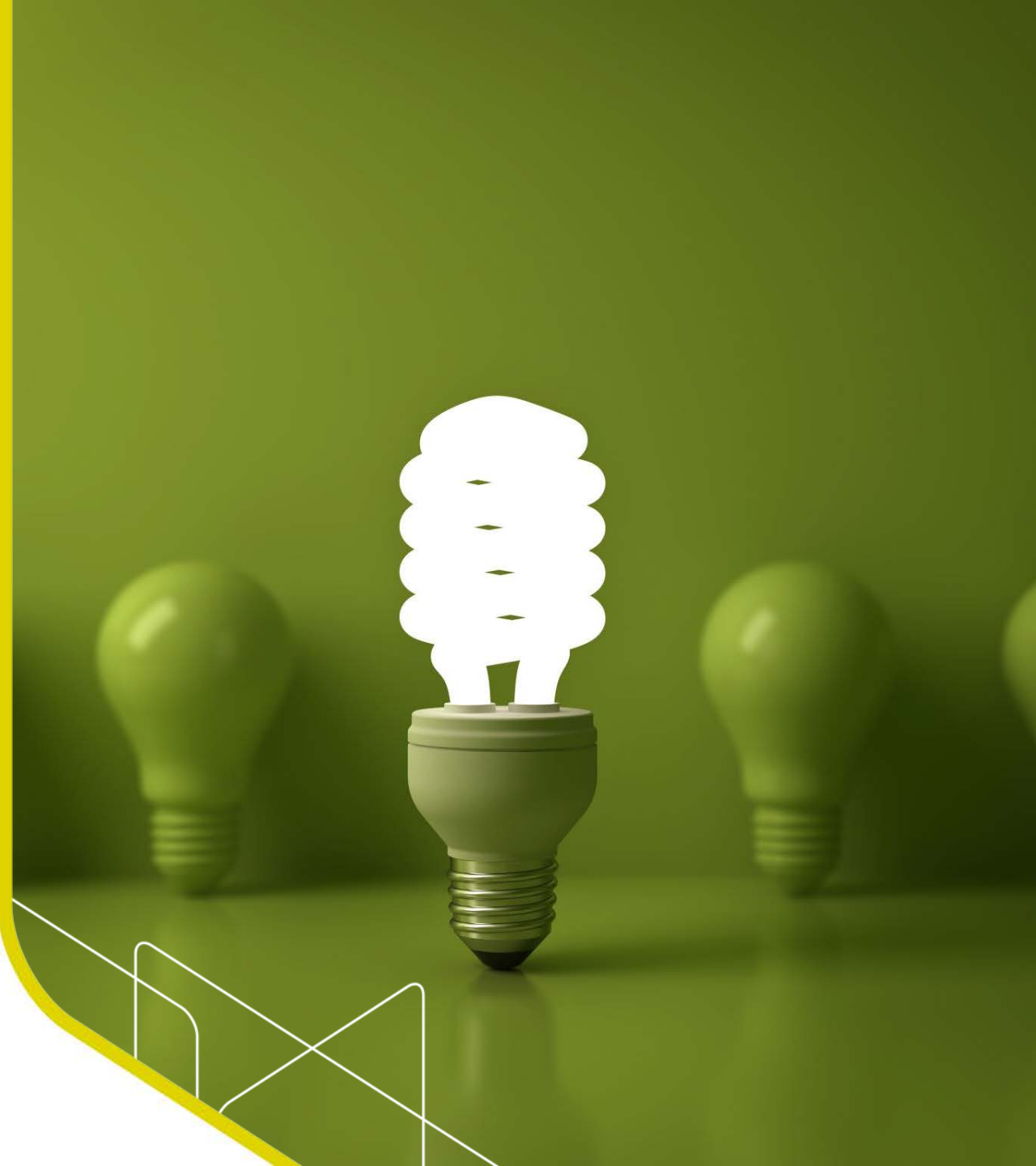
Summary of proposed policy proposals

#	ITEM	PROPOSED POLICY PROPOSALS
1	Clarity of definitions	<ul style="list-style-type: none">a) Amend the definition of Nameplate Capacity to reflect originally designed capacity, adjusted to include the impact of any significant modifications or degradation.b) Amend the definition of Capacity Outlook such that it reflects what is expected to be produced, injected, withdrawn etc.c) Ensure the Capacity Outlook does not overlap with the Medium Term Capacity Outlook so information is only entered and reported once.d) Remove ambiguity over the LCS Flag definition by defining maximum operational outlet capacity.
2	Improving consistency with provisions in the NGL	<ul style="list-style-type: none">a) Introduce information accuracy requirements in the GSI Rules, consistent with those in the information access standard intended to be adopted for WA.b) Introduce a clause, for the avoidance of doubt, that duty of confidence is not a reason to withhold information under the GSI Rules, to reflect the access information standard intended to be adopted for WA.
3	Formalising improvements to the GSOO	<ul style="list-style-type: none">a) Extend the minimum timeframe for the GSOO from “at least 10 years” to 20 yearsb) Amend the requirements for the content of the GSOO to also include decarbonisation pathways for gas users and information on gas usage for electricity generation <p><i>Note - forecasting related to the GSOO is planned to be resourced internally from 2026 onwards</i></p>

Summary of proposed policy proposals

#	ITEM	PROPOSED POLICY PROPOSALS
4	Reporting of LNG exports	a) Introduce requirements in the GSI Rules for information currently captured in the WA Domestic Gas Statement (including 2025 updates) to be provided by Producers to AEMO and published on the GBB.
5	Improvements to the GBB	<p>Subject to AEMO's cost assessment of implementation and further cost/benefit considerations:</p> <ul style="list-style-type: none">a) Publish relevant information on the WA GBB as published nationally, including for pipelines and production facilities – flow, capacity and utilisation, and for storage – capacity, flow, balance and available capacity.b) Include net consumption of WA zones on the GBB in addition to Total Receipt and Total Delivery to avoid confusion of gas that simply transitions through a zone (and amend any necessary GSI Rules to achieve this.c) Require AEMO to publish gas related WEM information on GBB such as demand, supply, linepack and peak consumption.d) Introduce a free text field to Capacity Outlook reporting on the GBB.
6	NGR 'other gases' provision	a) Subject to the timing of the NGLWA regulatory framework being extended from natural gas to 'covered gases', a review of the relevant GSI Rules should be undertaken.
7	Transparency of ERA investigations	a) Introduce provisions in the GSI Rules requiring the ERA to publish information on investigations in a public register, consistent with those in the ESM Rules.

Policy proposals to clarify



Reporting of LNG exports

Working together for a **brighter** energy future.



What we heard – Reporting of LNG exports

The WA Domestic Gas Statement intends to increase transparency in the WA domestic gas market on:

- Each operating domestic gas project;
- Historical gas supply by producer and expected supply by project; and
- Each LNG exporter, including their obligation to supply the domestic gas market and strategy to meet their domestic gas commitment by end of field life and/or commitment life.

As part of the 2025 update, DEED has:

- Disaggregated expected supply by proponent.
- Expanded the expected supply horizon from 3 to 5 years (2025-29).
- DEED is currently receiving this information from proponents and is aiming to publish the updated Statement in October 2025.

The WA Government has committed to review the Statement after 24 months (in 2026) with the option to legislate this transparency measure if required.

What we heard – Reporting of LNG exports

- There is limited information available about the amount of gas produced and sold as LNG.
- As part of the Inquiry, DEED (former JTSI) committed to collect and report on producers' compliance with commitments under the WA Domestic Gas Policy.
- Producers are currently providing this information annually by 31 March each year.
- The information collected is actual volumes for the previous calendar year and annual is a reasonable timeframe.
- This information is expected to be published around 6 months later in the form of a table on the WA Government's website (note: the 2024 data has not yet been published).
- Many stakeholders including members of the working group were unaware of the publication.
- The information is currently being provided voluntarily by producers, and published, with no legislative requirement for provision of information, accuracy or timing.
- The Inquiry raised the opportunity to legislate the requirement if it proved useful. **The GSI Rules may be an appropriate place to include that obligation.**

Considerations and discussion points – Reporting of LNG exports

Members to provide views on the following table of proposed information to be provided and published on the GBB.

Is there any further information that would be helpful for users to understand what gas has been made available and is reasonably expected to be made available in the future? LNG sales? Agreement end date? Any other calculations?

Is the general position regarding the frequency of this reporting obligation annual reporting, if so, when?

What is the expected cost of this addition to the GBB?

Project Proponent	Indicative Domgas commitment	Domgas supplied in 2025	Total Domgas supplied as at end of 2025	Total of commitment achieved as at end of 2025	Agreement Length	Agreement length complete	Remaining Domgas to be supplied		Expected Domgas Supply (PJ)					Contact
							(PJ)	TJ/d	2026	2027	2028	2029	2030	
	(PJ)	(PJ)	(PJ)	%	yrs	%	(PJ)	TJ/d	2026	2027	2028	2029	2030	
e.g. North West Shelf														
Company 1	120	5	80	67%	20	60	40	5	40	42	35	TBC	TBC	xyz@company.com.au
Company 2	150	7	15	10%	15	12	135	20						xyz@company.com.au
Company 3	146	9	45	31%	50	50	101	20						xyz@company.com.au
Company 4	100	15	26	26%	10	10	74	14						xyz@company.com.au
e.g. Gorgon														
Company 1	400	50	250	63%	12	50	150	100	45	50	48	TBC	TBC	xyz@company.com.au
Company 2	25	3	4	16%	20	30	21	3						xyz@company.com.au
Company 3	8	2	5	63%	65	40	3	1						xyz@company.com.au
etc														

Opportunities to improve the WA GBB

Working together for a **brighter** energy future.



What we heard – Opportunities to improve the WA GBB

- There is value in providing transparency on where and when there is spare capacity (production, transport, storage) that could be utilised.
- The East Coast GBB is a good reference point to start looking at what might be useful to add to the WA GBB.
- Suggested additions are for pipelines and production facilities – flow, capacity and utilisation, and for storage – capacity, flow, balance and available capacity.
- We need to 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.
- There is an opportunity to provide more demand-side information on the GBB (for example, forecast and actual GPG consumption, and peak consumption in the WEM).
- The solution should provide for a more coordinated and timely response to emergency supply issues (e.g. remove the exemption to not update MTCO if CO changes materially).
- It would help if the definitions etc were consistent with other information provided under the NGL such that the WA GBB could serve as a single point of information.
- There could be some improved operation aspects such as a free text field to clarify any changes to the Seven Day Capacity Outlook.
- AEMO noted that while there are opportunities to improve the WA GBB the costs may vary.
- Working Group members agreed cost should be balanced against benefit.

Alignment - Opportunities to improve the WA GBB

For discussion

What relevant and useful metrics/graphics from the East Coast GBB would be useful if replicated on the GBB?

Summary
Thursday 21 August 2025 Change Date Export

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	40	32
TOTAL	5,603	5,511	92

Storage
Thursday 21 August 2025 Change Date

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

Pipelines
Thursday 21 August 2025 Change Date

FACILITY	FLOW (TJ)	CAPACITY (TJ)	UTILISATION (%)
APLNG	1,494	1,700	88%
CGP	68	119	57%
EGP	124	327	38%
GLNG	837	1,430	59%
MARS	120	240	50%

Production
Thursday 21 August 2025 Change Date

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

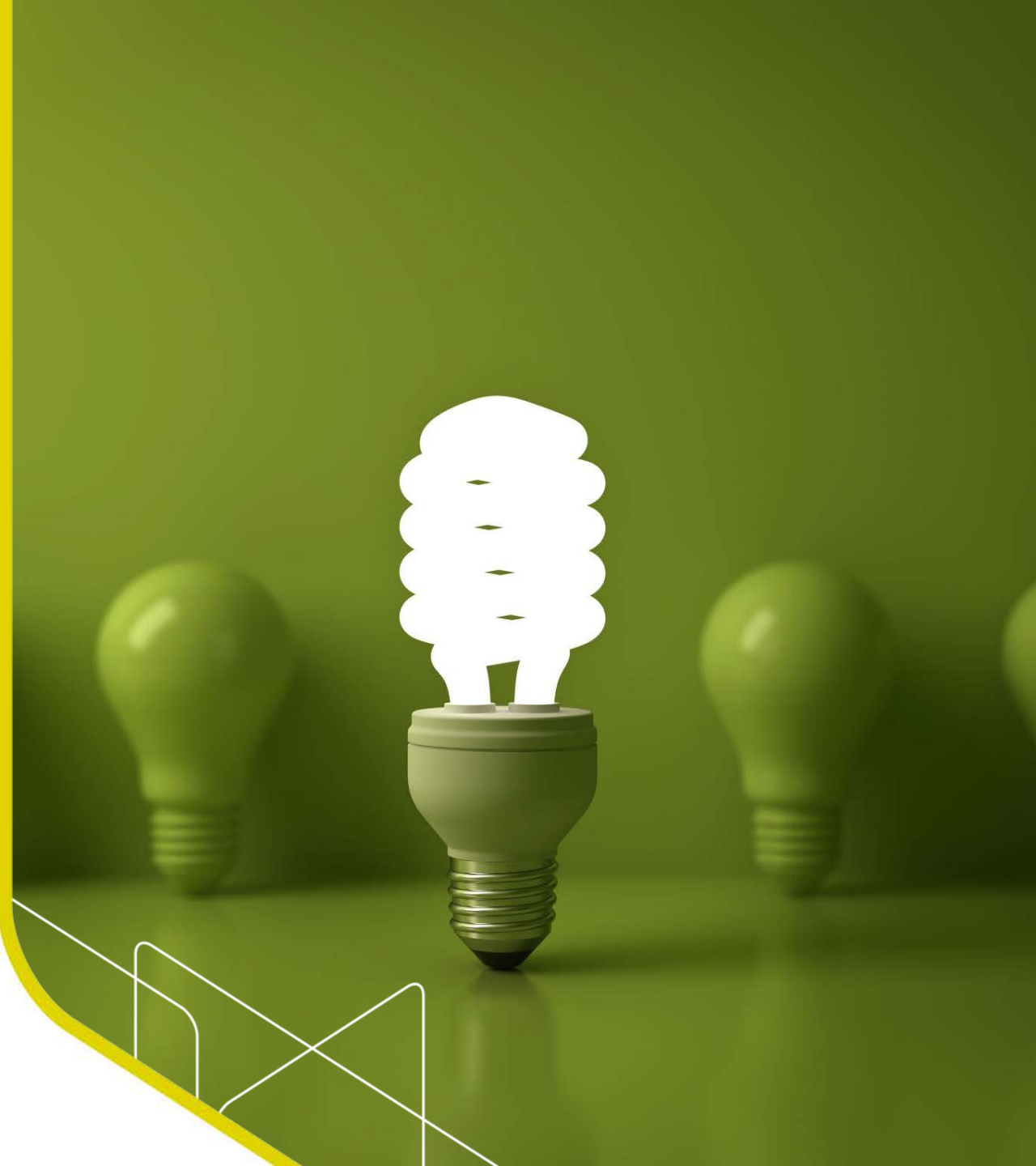
<https://www.aemo.com.au/energy-systems/gas/gas-bulletin-board-gbb/data-gbb/interactive-map-gbb>

Cost considerations – Opportunities to improve the WA GBB

For discussion

Scope of enhancement identified by group	Indicative cost (AEMO)	Recommend
LNG volumes	\$ or \$\$ or \$\$\$	Yes/No
Outage quantity	TBC	Yes/No
Utilisation for all facility types	TBC	Yes/No
Spare capacity	TBC	Yes/No
Separation / duplication of CO and MTCO	TBC	Yes/No
Gas usage from WEM data dashboard, actual and forecast GPG use and peak	TBC	Yes/No
Net consumption by zone in addition to receipt and delivery	TBC	Yes/No
Free text box for CO like MTCO	TBC	Yes/No

New items to be discussed



Policy proposal – Transparency of ERA investigations

For discussion

Description of issue

- The ERA is not currently required/able to provide information about its investigations under the GSI Rules
- This has limited the information able to be provided regarding compliance issues and outcomes of investigations for example to the GAB

Benefits of addressing the issue

- More information can be shared regarding the ERA's compliance monitoring and investigations
- Greater transparency improves market outcomes
- Sharing of non-confidential information would help resolve known issues with rules, interpretation and operations in reasonable timeframes

Proposal

- Consider adopting / adapting the concept of a public register in ESM Rules

Public register

2.13.49. The **Economic Regulation Authority** must keep a public register of:

- breaches of the **ESM Rules** where the **Economic Regulation Authority** issued a civil penalty notice under clause 2.13.36(c), that was not set aside by the **Electricity Review Board**;
- any other breaches or contraventions of the **ESM Rules** the **Economic Regulation Authority** concludes have occurred where the **Economic Regulation Authority** reasonably considers that:
 - the benefit to the **Wholesale Electricity Market** in disclosing the breach outweighs any detriment to the **Rule Participant** that committed the breach; or
 - whether, having regard to the nature and impact of the breach, in the **Economic Regulation Authority's** reasonable opinion, it would expect a breach to be disclosed on the public register.

2.13.49A. The **Economic Regulation Authority** must keep a public register of:

- investigations commenced by the **Economic Regulation Authority** of alleged breaches of these **ESM Rules** by **Rule Participants**, provided that any information identifying **Rule Participants** is redacted or otherwise anonymised;
- investigations closed by the **Economic Regulation Authority**, where it was determined by the **Economic Regulation Authority** that no breach had occurred, including any reasons for its determination; and
- investigations closed or suspended by the **Economic Regulation Authority** under clause 2.13.33, including its reasons for closing or suspending the investigation.

2.13.50. Subject to clause 2.13.51, the public register referred to in clause 2.13.49 must include the following information in relation to each breach recorded on the public register:

- the name of the **Rule Participant** that committed the breach;
- each provision of the **ESM Rules** or **WEM Procedure** that was breached;
- all relevant information relating to the time the breach occurred and duration of the breach, including impacted **Trading Days** and **Dispatch Intervals** as relevant;
- a summary of any action taken by the **Rule Participant** to remedy the breach, or to prevent a recurrence of the breach; and
- the action taken by the **Economic Regulation Authority** as a result of the breach.

2.13.51. Information must not be included in the public register referred to in clause 2.13.49 if:

- the relevant **Rule Participant** has provided evidence to the **Economic Regulation Authority** that to do so would contravene a court order or law suppressing or prohibiting the publication of the information; or
- the information has been given a class of confidentiality status under Chapter 10 of these **ESM Rules** other than Public.

2.13.52. Claims for confidentiality of information which may be published under clauses 2.13.45, 2.13.47 or 2.13.53 must be dealt with in accordance with sections 10.2, 10.4 and 10.5.

2.13.53. The public register kept by the **Economic Regulation Authority** under clause 2.13.49 must be published on its website.

Considerations – Other gases

For discussion

Description of issue

In the national framework the term natural gas was replaced with covered gas. Covered gas includes:

- Natural gas
- Hydrogen
- Biomethane
- Synthetic methane
- Blends of these gases

We expect these changes to be adopted in WA

Benefits of addressing the issue

- Alignment with national rules
- Acknowledgement of movement towards renewable gases and ability to blend within pipelines and storage facilities
- Accuracy of information under the GSI

Outstanding questions

How should the GBB and broader GSI framework account for ‘other gases’ and address the timing and complexity of expanding these reporting requirements?

Proposal

- Noting the potential for significant changes to the GSI Rules, potential impost on participants and prospective timing for the need for information on other gases:
- Commit to a review of the changes that would be required ahead of adopting the legislation for other gases

Items we are clear on



What we heard – Clarity on definitions

- **Some definitions need tidying up to clarify what information should be reported, this includes Nameplate Capacity, Capacity Outlook, Medium Term Capacity Outlook and LCA Flag for storage facilities.**
- **Some definitions need refining to ensure compliance with reporting can be enforced including Nameplate Capacity and Capacity Outlook.**

Policy proposal – Definition of Nameplate Capacity

Description of issue

- There is a perception that participants are not providing an accurate reflection of the current maximum technical operating limits, but instead the original design capacity.
- The use of original design limits may be overstating current maximum quantities.

Benefits of addressing the issue

- Improved accuracy of maximum quantities.

Proposal

- Clarify the intent to reflect maximum operating limits, including where relevant any material improvement or degradation from original design capacity.

Proposed

Nameplate Capacity means:

- (a) for a Transmission Pipeline, the maximum quantity of natural gas that, under normal operating conditions, can be delivered through the pipeline on a Gas Day, **updated to reflect any material modifications or degradation from the original facility design;**
- (b) for a Gate Station, the maximum quantity of natural gas that, under normal operating conditions, can be delivered from a GBB Pipeline to the Gate Station on a Gas Day, **updated to reflect any material modifications or degradation from the original facility design;**
- (c) for a Production Facility, the maximum quantity of natural gas that, under normal operating conditions, can be produced by the Facility and injected into one or more GBB Pipelines on a Gas Day, **updated to reflect any material modifications or degradation from the original facility design;**
- (d) for a User Facility, the maximum quantity of natural gas that can be delivered to the Facility on a Gas Day (i.e. that the connection to the Facility is capable of allowing), **updated to reflect any material modifications or degradation from the original facility design;** and
- (e) for a Storage Facility, **to reflect:**
 - (i) **Production Nameplate Capacity;**
 - (ii) **Refill Nameplate Capacity;** and
 - (iii) **Storage Nameplate Capacity.**

Policy proposal – 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 made 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

Proposal

- Clarify the intent of Capacity Outlook as a short-term estimate of gas quantities expected to be available, accounting for all factors including, for example, upstream constraints
- Adapt the definition of Short Term Capacity Outlook that applies nationally

Current

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).

Proposed

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 **is expected to be**:
 - (i) transported through the pipeline; and
 - (ii) delivered at each Gate Station, on the Gas Day, **accounting for all factors that may reasonably impact that estimate**, 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 **is expected to 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, **accounting for all factors that may reasonably impact that estimate**, 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 **is expected to be** injected from the Facility into GBB Pipelines on the Gas Day, **accounting for all factors that may reasonably impact that estimate**, over that time (see rule 72).

Working together for a **brighter** energy future.

Policy proposal – Definition of Medium Term Capacity Outlook

Description of issue

- Medium Term Capacity Outlook is not well defined, The glossary refers to the information provision rule relevant to each facility type.
- Currently there is no requirement to update the MTCO for the seven days covered by the CO, this means there may be conflicting / inconsistent information.
- *Note:* on the East Coast GBB the equivalent of the MTCO is 12 months after the capacity outlook so there is no overlap.

Benefits of addressing the issue

- Establishing a definition in the glossary will improve clarity and remove circularity.
- Removing the overlap of the Capacity Outlook and the MTCO will remove the potential for conflicting /inconsistent information.
- Removing the overlap will ensure participants do not need to input information twice.

Proposal

- Define Medium Term Capacity Outlook in the glossary by adapting the definition that applies nationally.
- Remove the overlap between MTCO and Capacity Outlook, noting this would extend the MTCO and extra seven days.

Current

Medium Term Capacity Outlook means:

- (a) a medium term capacity outlook provided to AEMO by a Registered Pipeline Operator in accordance with rule 56;
- (b) a medium term capacity outlook provided to AEMO by a Registered Storage Facility Operator in accordance with rule 64; and
- (c) a medium term capacity outlook provided to AEMO by a Registered Production Facility Operator in accordance with rule 71.

Proposed

Medium Term Capacity Outlook means **the information about matters expected to affect the capacity of a facility for an outlook period of 12 months immediately following the seven day Capacity Outlook, required** under:

- (a) rule 56 for a Registered Pipeline Operator;
- (b) rule 64 for a Registered Storage Facility Operator; or
- (c) rule 71 for a Registered Production Facility Operator.

Policy proposal – Definition of LCA Flag for storage

Description of issue

- The definition of LCA Flag uses the undefined term ‘maximum operational outlet capacity’ which is not defined.
- It is unclear whether the flag only applies from withdrawals, not injections.
- Should limitations on injections also be reported?
- What should be reported if flows were lower than nameplate, but could be maintained for the defined period?

Benefits of addressing the issue

- Ensures we capture all limitations that would affect gas supply.
- Ensures consistent application and accurate reporting.
- Provides accurate signals to the market about availability.

Proposal

- Define maximum operational outlet capacity consistent with the NGR.
- Clarify whether WG members require any further information about injections, into storage facilities.
- Clarify whether additional information about outlet capacity restrictions is required / useful.

Current GSI

LCA Flag means for a Gas Day:

- b. for a GBB Storage Facility, a green, amber or red flag indicating the best estimate of the Registered Storage Facility Operator of the number of days for which supply of natural gas can be maintained at **maximum operational outlet capacity** (allowing for forecast refilling), where:
 - i. a green flag indicates more than seven days;
 - ii. an amber flag indicates three to seven days; and
 - iii. a red flag indicates less than three days.

Current NGR

maximum operational outlet capacity of a storage facility means the maximum quantity of gas that the operator of the facility reasonably expects to be able to withdraw from the storage facility on a gas day under normal operating conditions

Improving consistency with provisions in the NGL

Working together for a **brighter** energy future.



What we heard – Improving consistency with provisions in the NGL

- It is reasonable to expect a certain level of rigour around the accuracy of all information provided for the purposes of the GBB (and EMF) and GSOO, this is not currently explicit in the GSI Rules.
- There is an opportunity to align information principles from the NGR / NGR WA into the GSI Rules to bolster information accuracy.
- There is overlap between information required under the NGR, and being published on the GBB
- The introduction of explicit information accuracy and provision requirements is not expected to place any material impost on participants.

Policy proposal – Improving consistency with provisions in the NGL

Description of issue

The GSI 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 doesn't provide information on:

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

Benefits of addressing the issue

- Improved GBB accuracy, provision of information
- Accurate information during an emergency
- Enables effective compliance, monitoring and enforcement

Proposal

- Introduce principles from the NGR / WA NGR information standard into the GSI Rules to ensure reasonable accuracy of information.
- Introduce a clause clarifying that a duty of confidence is not a reason for non-compliance with the GSI Rules.

Formalising improvements to the GSOO

Policy proposal: Formalising improvements to the GSOO

Description of issue

Requirements of the Inquiry:

- 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.
- Extending the outlook to 20 years.

Benefits

- Increase transparency of forecast supply and demand over the long term.
- Increase alignment with electricity for whole of energy sector view.
- Improved understanding of usage patterns and changing behaviours.

Proposal

- Extend the minimum timeframe for the GSOO from “at least 10 years” to 20 years.
- Amend the requirements for the content of the GSOO to also include decarbonisation pathways for gas users and information on gas usage for electricity generation.

Note - forecasting related to the GSOO is planned to be resourced internally from 2026 onwards.

Working group timeline



Thank you



Department of
Energy and Economic
Diversification

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](#)
- [WA Domestic Gas Statement](#)
- [NEL Other Gases Act](#)
- [NEL Gas Pipelines Act](#)
- Relevant National Gas Rules
 - [Part 10](#)
 - [Part 18A](#)

Appendix

WA Domestic Gas Statement – Export

Project Proponent	Indicative Domgas commitment ⁽¹⁾ (PJ)	Domgas supplied in 2023 ⁽²⁾ (PJ)	Total Domgas supplied as of end 2023 (PJ)	Remaining Domgas to be supplied ⁽³⁾		Expected Domgas supply ⁽⁴⁾		
				(PJ)	(TJ/d)	2024 (PJ)	2025 (PJ)	2026 (PJ)
North West Shelf⁽⁵⁾								
Woodside	235	4	61	174	38	48	55	40
bp	117	9	38	79	15			
Chevron	117	9	42	75	15			
MIMI	117	7	25	92	15			
Shell	117	7	18	99	15			
Pluto								
Woodside	N/A ⁽⁶⁾	8	31	N/A	40	15	15	15
Wheatstone-Iago								
Chevron	817	52	175	642	140	61	64	59
KUFPEC	79	5	22	57	15			
Kyushu Electric	9	1	5	4	3			
PE Wheatstone	102	6	28	74	18			
Julimar-Brunello								
Woodside	106	10	37	69	30	17	17	17
KUFPEC	58	5	24	34	16			
Gorgon								
Chevron	947	48	221	726	120			

<https://www.wa.gov.au/government/publications/wa-domestic-gas-policy-wa-domestic-gas-statement>

What we heard – Reporting of LNG exports

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

Improving consistency with provisions in the NGL - information transparency principles

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.

Improving consistency with provisions in the NGL – Publication of information

Information from Mr Moerch

- The NGL and the NGR are not prescriptive about the way a service providers must publish information.
- Whether a link is appropriate would appear to be at the discretion of the regulator.
- The AER is understood to accept links to required information, pragmatically there is no reason to suggest it would be different in WA.
- Replicating publication is inefficient and increases the risk of inconsistent information.
- However, by providing link to an external source, a service provider loses a degree of control with whether it complies with the regulatory requirements (but this risk should be minimal if the link is to GBB-hosted information).