

Meeting Agenda

Meeting Title:	Gas Advisory Board
Meeting Number:	2025_10_23
Date:	Thursday 23 October 2025
Time:	1:30 to 3:00 PM
Location:	Online, via TEAMS

Item	Item	Responsibility	Type	Duration
1	Welcome and Agenda <ul style="list-style-type: none"> Conflict of interest Competition Law 	Chair	Noting	2 min
2	Meeting Apologies/Attendance	Chair	Noting	2 min
3	Action Items	Chair	Discussion	3 min
4	GBB Data Visibility Issue and other matters	AEMO	Verbal update	10 min
5	ERA's compliance monitoring and enforcement update	ERA	Noting	10 min
6	Review of the Gas Services Information (GSI) Rules update including: <ul style="list-style-type: none"> Draft Proposals and Rationale 	Chair of the GSIRRWG	Discussion	60 min
7	Overview of Rule Change Proposals	Chair	Noting	1 min
8	General Business	Chair	Discussion	2 min
	Next Meeting: GAB Meeting Schedule for 2026 - TBC			

Please note this meeting will be recorded.

Competition and Consumer Law Obligations

Members of the Gas Advisory Board (**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 the GAB 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.

Agenda Item 3: Gas Advisory Board (GAB) Action Items

Meeting 2025_10_23

Shaded	Shaded action items are actions that have been completed since the last GAB meeting.
Unshaded	Unshaded action items are still being progressed.
Missing	Action items missing in sequence have been completed from previous meetings and subsequently removed from log.

Item	Action	Responsibility	Meeting Arising	Status/Progress
112	The Economic Regulation Authority (ERA) is to annually provide information and updates to the GAB on the ERA's compliance processes.	ERA	2022_10_27	Open Provided at Agenda Item 5
118	The ERA to: <ul style="list-style-type: none"> provide more historical data on breaches over time at the 20 March 2025 GAB meeting, and to undertake further analysis on the nature of breaches for consideration by the GAB. Update the GAB on the timeframe for providing GAB members with information regarding the investigation into the Capacity Outlook reporting. 	ERA	2024_08_29	Closed The ERA presented and provided an update at the 20 March 2025 GAB meeting.

Item	Action	Responsibility	Meeting Arising	Status/Progress
120	Ms Smith to: a) advise the GAB of where further information about fuel gas is being reported outside of the GBB.	Ms Smith	2024_08_29	Closed Ms Smith provided an update at the 20 March 2025 GAB meeting.
120	Classification and registration issue with the GBB The AEMO b) to provide the GAB members with further information regarding the classification and registration issue with the GBB, the work that has been undertaken to date, the reasons for the delay, and when more detailed information can be provided.	AEMO	2025_03_20	Open Information to be provided to the GAB members out of session and as an agenda item for the October 2025 GAB meeting. AEMO will provide further information in Agenda Item 4.
121	GAB working group for the Review of the GSI Rules Ms Guzeleva to invite JTSI to participate in the working group.	GAB Secretariat	2025_03_20	Closed The 2025 Public Sector Reform created the new Department of Energy and Economic Diversification (DEED) from Energy Policy WA and JTSI. Vivek Karia from DEED is a member of the GSI Rules Review Working Group.

Agenda Item 5: The ERA's Compliance Monitoring and Enforcement under the GSI Rules

Gas Advisory Board (**GAB**) Meeting 2025_10_23

1. Purpose

In response to Action Item 112, the Economic Regulation Authority (**ERA**) will provide information and updates to the GAB on the ERA's compliance monitoring and enforcement process under the GSI Rules on an annual basis.

2. Recommendation

That the GAB notes:

- the information provided in this paper; and
- discusses the attached presentation from the ERA.

3. Background

At its meetings on 23 September 2021, 28 October 2021, 24 March 2022 and 27 October 2022, the GAB discussed:

- the interpretation of the information provision requirements in Part 3 of the GSI Rules;
- a potential reporting gap related to producer outages, which may not be captured as part of the emergency management system reporting; and
- a gap analysis of the information provision requirements under the GSI Rules.

At its 24 March 2022 meeting, the GAB concluded that the issue is not caused by the information provision requirements in the GSI Rules and may instead relate to compliance with the reporting requirements. The GAB sought clarification on the process for stakeholders to raise compliance concerns, which was discussed at the GAB meeting on 27 October 2022.

At its 27 October 2022 meeting, the GAB concluded that the ERA should provide annual information and updates to the GAB on the ERA's compliance processes.

4. Annual Update

At its 29 August 2024 meeting, the GAB requested that the ERA provide additional historical data on breaches at the next GAB meeting, and to undertake further analysis on the nature of these breaches for consideration by the GAB.

At the 20 March 2025 GAB meeting, the ERA presented this additional information, along with an update on its compliance monitoring and enforcement processes.

As the ERA provided this further detail in March 2025, this annual update covers the period since that meeting. It reflects the most current information available at the time of preparation and accounts for the lead time required to finalise papers for the GAB.

5. Attachments

- (1) ERA compliance monitoring and enforcement process update



Economic Regulation Authority
WESTERN AUSTRALIA

ERA GSI compliance update

Gas Advisory Board

23 October 2025

GSI Rule breach allegations received

April 2025 – September 2025

Reported breach categories

• 2024 EMF test	16
• Market information	10
• Registration requirements	1
• <u>AEMO publishing & invoicing</u>	<u>2</u>
Total	30

Reported by

• AEMO (participants breaches)	16
• ERA	9
• Self-reported AEMO	2
• Self-reported by participants	2

GSI investigations

April 2025 – September 2025

Closed breach allegations

• Late invoice payments	80
• GSOO information	28
• GBB registrations	1
• GBB Reporting	4
• GBB contact details	9
• <u>Other</u>	<u>20</u>
Total	142

Current

• Registration obligations	1
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Remaining investigation backlog

• EMF information 2024	35
• <u>Other</u>	<u>9</u>
• Total	44

Agenda Item 6: Update on the Gas Services Information Rules Review Working Group

Gas Advisory Board (GAB) 2025_10_23

1. Purpose

The Chair of the Gas Services Information (GSI) Rules Review Working Group (GSIRRWG) to provide an update on its work and the proposed outcomes of Stages 1-2 of the Review.

2. Recommendation

That the GAB:

- notes the updates from the GSIRRWG meetings on 7 August, 4 September and 25 September 2025;
- notes the draft minutes of the 4 September 2025 GSIRRWG meeting in **Attachment 1** (yet to be reviewed by the GSIRRWG members); and
- reviews and provides feedback on the summary of proposed outcomes arising from the GSI Rules review as presented in **Attachments 2 and 3**; and
- notes that a draft consultation paper that presents the proposed outcomes from Stages 1-2 of the Review will be shared with the GAB out of session.

3. Background

The Coordinator of Energy (Coordinator), in consultation with the GAB, is carrying out a review of the Gas Services Information (GSI) Rules (the Review).

There are two key drivers for the Review: [the recent Inquiry into the WA Domestic Gas Policy](#) (the Inquiry), and proposed changes to the National Gas Law (NGL) and National Gas Rules (NGR) as they may apply in WA.

The Review has three primary objectives:

- assess the GSI Rules in the context of the Inquiry's findings, which were supported by the WA Government (recommendations 15-17 and 23), and propose any necessary amendments or clarifications to the GSI Rules aimed at achieving the intent of the recommendations;
- ensure consistency with provisions in the NGL and NGR in light of a proposal to adopt Parts 10 and 18A of the NGR in WA; and
- evaluate additional aspects of the rules that may require clarifications or amendments.

The Review is being conducted in three stages, as follows:

1. Assessment of relevant provisions of the GSI Rules and identifying opportunities and options for improvements;
2. Proposals development and assessment; and

3. Development of draft rules to implement the final outcomes of the Review.

The GAB established the GSIRRWG to support the Coordinator's review.

The GSIRRWG has met three times (7 August, 4 and 25 September 2025). The topics covered at each meeting were:

- The 7 August 2025 meeting focused on the boundaries and issues in scope of the Review as well as the approach to Stage 2 of the Review, with members raising and identifying initial opportunities for improvements to the Gas Statement of Opportunities (GSOO) and the Gas Bulletin Board (GBB).
- The 4 September 2025 meeting commenced a discussion around options/solutions and the GSIRRWG was asked to provide feedback of the advantages and disadvantages of proposals put forward by members.
- The 25 September 2025 meeting focused on finalising the discussion on the proposed Review outcomes.
 - The GSIRRWG reached general agreement on some of the proposals, while no agreement was reached on others, including the proposal to include information on domestic gas market obligations in the GSOO.
 - It was agreed that some options and solutions regarding improvements to the GBB require further refinement by AEMO, including implementation cost assessments and additional analysis of effort/practicality.

The draft Consultation Paper outlining the proposed outcomes from Stages 1–2 of the Review will be shared with the GAB out of session, once AEMO has finalised its assessment.

A table is included in **Attachment 3**, presenting each proposed outcome and a summary of the high-level rationale for each proposal.

Papers and minutes from the GSIRRWG meetings are available on the [GSIRRWG webpage](#). Further information on the Review of the GSI Rules, including all Papers are available on the [GSI Rules Review webpage](#).

4. Next steps

Activity	Timing
Update to the GAB on the Review proposed outcomes	23 October 2025
Finalise proposed outcomes and draft Consultation Paper	October-November 2025
Consult with the GAB out of session on a draft Consultation Paper	November 2025
Consult with the GAB out of session on a draft Information Paper and Exposure Draft of GSI Amending Rules	February 2026
GSI Amending Rules submitted to Minister for Energy for approval	TBC

5. Attachments

Agenda Item 6 - Attachment 1 – 4 September 2025 GSIRRWG draft meeting minutes

Agenda Item 6 - Attachment 2 – GSIRRWG Presentation

Agenda Item 6 - Attachment 3 - Summary Table - Draft Proposals and Rationale

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

Date:	4 September 2025
Time:	10:00am – 12:00pm
Location:	Microsoft Teams online

Attendees	Representing in GSIRRWG	Comment
Dora Guzeleva	Chair, Energy Policy WA (EPWA)	
Erin Stone	Point Global	
Steve Hughes	Point Global	
Aiko Ueno	Alinta Energy	
Beck Mason	APA Group	Proxy for Jack Rowe
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	
Brian Pridgen	Australian Energy Producers	
Vivek Karia	Department of Energy and Economic Diversification	
Angelina Cox	Woodside	Proxy for Ana Stankovic
Other attendees	From	Comment
Rasmus Moerch	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
Jack Rowe	APA Group	
Ana Stankovic	Woodside Energy	

1. WELCOME

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

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

2. MEETING APOLOGIES AND ATTENDANCE

The Chair noted the apologies and attendance as listed above.

3. RECAP OF MEETING 1 AND ACTION ITEMS

The Chair noted:

- the closed action items and that open items would be addressed during today's meeting;
- that Ms Mason had submitted comments on action item #8 prior to the meeting, but that EPWA did not have sufficient time to circulate them; and
- that the third GSIRRWG meeting has been scheduled for 25 September 2025.
- Ms Mason agreed to raise her points in today's meeting if time allows.

4. PROPOSALS: OPPORTUNITIES TO IMPROVE THE GBB

Reporting in Liquefied Natural GAS (LNG) exports

- Mr McDougall and Mr Rafferty presented slide 6.
- Mr McDougall noted that, in developing their joint proposal, he had hoped participants could report LNG exports vs Domestic Gas sales monthly. However, Mr Rafferty had raised valid concerns about the practicality of this.
- Mr Rafferty explained that, due to the nature of the LNG joint ventures, participants might meet their DomGas obligations either early or later in the year. Therefore, monthly tracking against the 15% reservation would be unhelpful. He suggested annual reporting was sufficient, as more frequent data held little value from his perspective.
- He added that, while such data might interest those monitoring compliance, government compliance monitoring and enforcement has a more direct impact.
- Mr McDougall acknowledged Mr Rafferty's points but noted that issues affecting social licence had influenced market behaviour. For example, increased DomGas supply following the State Government's Inquiry report.
- He added that publishing such metrics could encourage gas buyers to report non-compliance, particularly if sellers weren't meeting their Domestic Gas Obligations (DMOs) but were unwilling to contract into the domestic market.
- Mr Pridgen noted that there is a disconnect between the proposal and the reality of DMOs, which apply over a project's life. He noted that DMOs vary in reservation percentages and that some are volume-based rather than linked to LNG export percentages.
- Mr McDougall noted that the proposal could be drafted to present the information in various ways, including acknowledging the varying obligations of different projects. He added that, should a project have a DMO less than 15% and be fully compliant with

that DMO, the transparency of information would lead to participants questioning decisions made by the Department of Energy and Economic Diversification (DEED).

- Mr Pridgen replied that compliance and enforcement mechanisms already exist to ensure that proponents meet their DMOs.
- Mr McDougall responded that, despite this, only proponents and the State Government understand these obligations or performance. He noted that greater visibility of DMOs and DomGas supply data would improve market efficiency.
- Ms Liddelow supported Mr Pridgen's points, noting that DMOs vary widely and DomGas supply fluctuates over a project's life, limiting the usefulness of monthly reporting. She questioned whether the proposal fits the review's scope and suggested transparency measures should apply to all market participants, not just producers, referencing the DomGas Inquiry report.

The Chair acknowledged Ms Liddelow's and Mr Pridgen's comments. In response to scope concerns, she explained that Recommendation 15 of the Inquiry Report directs EPWA and AEMO to review the GSI regime with reference to market transparency improvements, meaning that this proposal is in scope. She also welcomed a proposal by Ms Liddelow for new transparency obligations for gas users.

- Mr Pridgen noted Ms Liddelow's comment reflected a shared concern that such obligations might create an imbalance between producers and users regarding transparency.

The Chair emphasised the domestic gas market's purpose is to supply gas to users. The Inquiry's main concerns were users lacking transparency to plan and contract effectively. She noted that, in her view, adding obligations on producers would not disproportionately impact the market and invited further comments.

- Ms Cox, speaking for herself and Ms Stankovic, expressed concerns that more frequent reporting of LNG exports versus domestic gas sales could lead to data misinterpretation due to market fluctuations and questioned whether this transparency would add value.

The Chair asked how often gas producers currently report this information to DEED.

Mr Karia replied that LNG exporters report annually, on 31 March, covering the previous calendar year.

The Chair asked if members had any concerns about making this reported information transparent through the GBB once a year at the same time.

- Mr Karia noted that in 2023, DEED published the first WA Domestic Gas Statement, which includes some data similar to Mr McDougall and Mr Rafferty's proposal. While it doesn't cover LNG export data, it tracks domestic gas by project and producer compliance against DMOs. The latest edition will add a 5-year supply forecast.
- He emphasised that some transparency already exists, with producers voluntarily providing this data. The WA Domestic Gas Statement is an evolving area, and DEED is exploring collecting demand data from large gas users for future reports.
- Mr Pridgen noted that the Domestic Gas Inquiry Final Report focused on increasing transparency in the domestic gas market but questioned the usefulness of reporting LNG exports against DMOs due to the varying DMOs and commercial sensitivities.

The Chair responded that lack of transparency often leads to suspicion and market distortions. She asked Mr Karia if the market was generally aware of the varying DMOs.

- Mr Karia noted that many agreements underpinning the policy are publicly available, though the number of different instruments has been a challenge. DEED shares information on these agreements on its website, with minimal redactions. He added that the WA Domestic Gas Statement and DEED's website provide considerable information on how reservation policies apply to different projects.

The Chair stressed the need to clearly state the benefits of the proposal. She asked Mr McDougall for his view on the proposal's purpose and potential market benefits.

- Mr McDougall replied that, although the WA Domestic Gas Statement contains relevant information, it has limited visibility and is not easily digestible. He noted that his proposal could be adjusted to account for varying DMOs and agreements, but making this data available on the GBB would enhance transparency and help gas users understand producer performance and compliance.
- He reiterated that the proposal's aim is to improve understanding of domestic gas supply, which currently lacks clarity and transparency.

The Chair asked Mr McDougall how integrating his proposal into the GBB would improve or fill gaps beyond the information provided in the WA Domestic Gas Statement.

- Mr McDougall noted that he was unaware of the Statement, highlighting its limited recognition even among engaged market participants.

The Chair requested that Mr Karia provide context to members on the Statement.

- Mr Hannon shared a link to the Statement in the chat, and Mr Karia offered to provide members with further information and planned improvements.
- Mr Karia noted DEED's efforts to promote the Statement and welcomed suggestions for better stakeholder engagement.

ACTION: Mr Karia to circulate further information on the WA Domestic Gas Statement to working group members before the 25 September 2025 meeting.

Working group members to review the currently published WA Domestic Gas Statement and provide feedback on any information gaps before the 25 September 2025 meeting.

- Mr Prinsloo supported Mr McDougall's point that market information should be centralised and easy to understand. Acknowledging Mr Pridgen's concerns about varying DMOs and LNG exports, he added that the GBB could track individual project obligations without necessarily linking to LNG exports, focusing on producers' performance against their DMOs.
- Ms Liddelow reiterated her concern that reporting more frequently than annually might not be meaningful.

The Chair emphasised the importance of avoiding increased burden without clear benefits and purpose.

The Chair noted that several working group members, including Mr McDougall, were unaware of the WA Domestic Gas Statement. She added that since the GBB exists under the GSI Framework to centralise information and increase market transparency, further discussion may be warranted once Mr Karia provides more context on the Statement.

- Mr McDougall responded that including this information would improve the GSI framework and that capturing LNG sales data alongside domestic supply would add value.

The Chair asked if he would be satisfied with annual reporting on the GBB.

- Mr McDougall responded that he preferred more frequent reporting but recognised the value of compromise.

Clarifying capacity information requirements

Mr Hughes presented slide 7.

The Chair explained that this proposal arose from previous Gas Advisory Board discussions in which pipeline operators, users, and others raised concerns about inconsistent reporting of Nameplate Capacity, Medium Term Capacity Outlook (MTCO), and Capacity Outlook. EPWA considered the rules are clear but acknowledged the need to clarify definitions for consistent reporting.

- Ms Mason asked if the proposal was for facility operators to provide the gaps marked in red on slide 7.

Ms Stone confirmed this and added that the key question was whether the information is useful and if there are issues with the current data.

The Chair clarified that the group should explore whether new provisions are needed or if clarifying existing rules could improve consistency.

- Mr Pridgen questioned the relevance and usefulness of the information on slide 7, if reported by production facilities, noting that many contracts are short-term and uncontracted capacity changes daily.

The Chair responded that the Capacity Outlook is not only for the next seven days but must be updated daily before a certain time.

- Ms Mason added that daily availability and utilisation data could be calculated by AEMO from existing data. She agreed with Mr Pridgen on contracted positions and noted that Part 23 of the National Gas Rules already requires this information to be published on company websites.
- Ms Mason stated that it would be APA's position that any requirement for contracted positions should use the data they already publish to avoid duplication.

The Chair agreed with Ms Mason's point of the importance of aligning GSI proposals with existing or upcoming NGL obligations to prevent duplicated efforts.

Ms Stone asked Ms Mason to clarify if the obligation already exists and APA already fulfills it, and it applies to WA but is just not published.

- Ms Mason confirmed that this was correct regarding contracted capacity on pipelines.

The Chair noted that the proposal on slide 7 related to production and storage facilities and therefore the existing NGL provision would not apply to what is being presented.

- Mr Rafferty highlighted the *North West Shelf* as an example in which Nameplate Capacity does not reflect actual production capability, contributing to market confusion. He also noted that locally produced gas transported via pipeline and exported as LNG is not reflected in daily 'ins and outs' reporting, distorting the market's perceived mass balance.

The Chair acknowledged that this issue is being addressed, and that work is underway with AEMO to find a solution.

The Chair noted that confusion remains regarding Nameplate Capacity, MTCO and Capacity Outlook, as some facilities continue to report identical figures for each. She

questioned whether these terms require further clarification to support consistent and compliant reporting.

- Mr Pridgen asked if it would be useful if producers provided a forecast with spare capacity, as an alternative. He cautioned that contracted positions (e.g. firm vs available capacity, take-or-pay, banking) can complicate reporting.

Ms Stone acknowledged the complexity but stressed that, from a gas user perspective, clarity on what gas is available, whether 7 days or 3 months out, is essential.

- Mr Pridgen acknowledged the intent but warned of unintended consequences, including a misleadingly tight gas market.

The Chair noted that the rules distinguish between Nameplate Capacity and daily capacity outlook. MTCO should account for outages, and Capacity Outlook must reflect a current, accurate daily outlook. If reporting spare capacity is preferable, the group should consider it.

- Mr McDougall referred to the North West Shelf example, stating that its Nameplate Capacity (~630 TJ) is overstated. He suggested that Capacity Outlook should be what is forecast to be supplied from each facility for the foreseeable future, with an acknowledgement that strategies change. He added that spare and available capacity could exist as a rough indication of who to contact to request gas supply.
- Mr Gillespie stated that AEMO sees value in a consistent Capacity Outlook to better plan for potential supply disruptions. He also proposed improvements to MTCO to ensure updates reflect material changes, offering clearer insights into available headroom during disruptions.

The Chair noted that EPWA had provided a paper to the GAB stating that the MTCO should reflect any planned maintenance or outages for a facility.

- Mr Gillespie clarified that, while participants must currently update MTCO for periods outside their Capacity Outlook, AEMO supports updating the MTCO periods during the Capacity Outlook. This would show both reductions from outages and actual facility availability, improving visibility of available headroom during gas supply disruptions.
- Mr Gillespie considered that this would improve the accuracy of the MTCO and noted that amending subrule 71.4 would be straightforward.

The Chair stressed that clarity is needed to prevent inconsistent reporting, noting that pipeline operators struggle to manage line pack during major events without reliable data.

She confirmed the need to clarify and update the definitions of Capacity Outlook and MTCO.

- Mr McDougall said he couldn't verify physical capabilities but believed that, as long as Nameplate Capacity was reported correctly, the market should be able to respond appropriately during disruptions. He agreed that Capacity Outlook and MTCO were the main problems.

The Chair suggested clarifying the Nameplate Capacity definition to better reflect a facility's true capability.

- Mr Rafferty explained that Nameplate Capacity is an engineering term for a plant's maximum output under ideal conditions, which can be misleading. He stressed that the market needs to know if a plant can produce its Nameplate Capacity quantity on a given day, and doubted it often could.

ACTION: Ms Stone, EPWA and Ms Hobday to further discuss/review the definitions of Capacity Outlook, Nameplate Capacity and MTCO, and to report back on any clarifications to the rules to enable compliance, monitoring, enforcement, and consistent reporting against these definitions.

Definition of Capacity Outlook

Ms Stone presented slide 8.

- Ms Mason noted that it would be valuable for EPWA to speak with producer organisations from the east coast when developing the amended provisions as there doesn't seem to be as much confusion in those jurisdictions on this point.

Ms Stone agreed with Ms Mason and noted that 'expected to' and 'expected operating conditions' are used on the east coast.

The Chair noted that terms such as 'reasonable endeavours' have been a barrier to enforcement elsewhere and should be avoided.

Ms Stone enquired if estimate was still appropriate to include in the Capacity Outlook definition and the Chair agreed that it was.

Other opportunities to improve the WA GBB

Mr Hughes presented slide 9.

The Chair asked if definitions could be carried over from the east coast GBB.

Ms Stone noted that the slide focused on what additional information the group wants to replicate on the WA GBB. She added that the suitability of east coast definitions would be reviewed before adoption.

- Mr McDougall noted that storage information was not his main concern but supported AEMO making improvements as needed. He highlighted the 'Production' chart on slide 9 as a good example of facility outflows and next-day achievable capacity, and suggested a similar utilisation figure for pipelines would be valuable.

The Chair noted that any changes to storage and pipeline reporting should be aligned with the NGL for consistency

- Ms Ueno noted that Alinta has had positive experiences on the east coast with reported production and pipeline data, and would support adopting similar reporting in WA.
- On the reporting of Gas Powered Generation (GPG) Ms Ueno was concerned that there was information asymmetry with 5-minute reporting in the WEM versus longer term gas reporting for the GBB.

The Chair stated that demand side issues need to be addressed in equal measure to supply side issues to ensure obligations are not disproportionate.

Ms Stone handed over to Mr Gillespie to speak about net consumption and bringing features from the WEM data dashboard to the GBB.

- Mr Gillespie noted that in respect to net consumption, AEMO is developing a possible solution. He added that AEMO is also investigating issues with the forecast and nominated flows but has been unable to pinpoint the problem.
- He explained that since the WEM dashboard is hosted separately from the GBB, integration would take time and carry risks, and that mapping and costing would be required.

- Mr Gillespie emphasised that any changes, including features from the east coast GBB, should be evaluated based on costs and benefits. He suggested compiling a wish list of GBB features to improve transparency. He added that simpler tasks could be handled as part of AEMO's regular work, while more complex ones would need further assessment.

ACTION: Working group members to suggest metrics/graphics from the East Coast GBB and WEM data dashboard that would be useful if replicated on the GBB.

ACTION: Mr Gillespie and the team at AEMO to review the East Coast GBB and members' Wish List for items that could improve the WA GBB, categorising them by cost impact and required effort.

5. INFORMATION TRANSPARENCY

NGR information disclosure obligations and market transparency requirements

- Mr Moerch presented slide 11. He noted 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.
- Ms Mason noted that on the east coast, APA provides similar information under Part 10, much of which duplicates data submitted to the GBB. APA addresses this by reporting to the east coast GBB and linking it on its website to meet obligations.

ACTION: Mr Moerch to review the proposed Nation Gas Law (NGL) reporting amendments against GBB obligations and advise if digital links to GBB-hosted information would meet NGL requirements.

Ms Stone presented slide 12.

- Ms Mason stated that the NGL information standard would be sufficient and appropriate for addressing accuracy of information and asked Ms Stone to clarify the origin of the duty of confidence clause in the NGL.

Ms Stone referred to slide 18 and NGR 100B, noting that the review aims at bringing across the principles of the access information standard and NGR 100B to the GSI framework.

- Ms Mason questioned if this would apply to pipelines and storage under the GSI because the information is aggregated and not commercial in confidence.

The Chair noted that information provided under the NGL and linked via the GBB must comply with the same NGL information standards.

- Ms Mason agreed in cases of capacity and if information is produced in the same manner.

Ms Stone asked members, if they are publishing information for access purposes on their website and for the GBB, should they align the level of accuracy so that the information standard is consistent.

- Ms Mason responded that consistent standards are appropriate only if definitions and methods align and that differing standards under Part 10 and the GSI Rules would mean that the same standard shouldn't apply.

The Chair noted that if different standards apply to reporting obligations, then providing a link from the GBB may not satisfy NGL obligations.

Ms Mason and the Chair agreed that whatever standard is brought across for the NGL should be the same standard used for reporting on the GBB so that linking from the GBB is sufficient.

- Ms Mason noted that the same standard can't apply for anything on the GBB that is not covered under the NGL.

Ms Stone asked Ms Mason why a lower standard should apply to GBB information reporting than for access purposes.

- Ms Mason replied that it was not necessarily a lower standard. The access information standard is very detailed, and she was not sure that it applies to all GBB information that needs to be reported.

6. PROPOSALS: OPPORTUNITIES TO IMPROVE THE GSOO

Internalising WA GSOO forecasting

- Mr Gillespie presented slide 14 and reported that, following his action from meeting #2, AEMO's GSOO modelling will be done in-house from 2026, with consultants used only for niche expertise.
- Mr Rafferty thanked Mr Gillespie and stated that he was happy with this conclusion.

The Chair noted that the GSI Rules would need to be adjusted to bring them in line with the other improvements made by AEMO to the modelling.

7. OTHER ISSUES / OPPORTUNITIES

The Chair invited Ms Mason to speak on issues she circulated to EPWA out of session.

- Ms Mason noted confusion around the Linepack Capacity Adequacy Flag rules for Storage Facilities and suggested refining the rules to clarify intent and improve market signals.
- Mr McDougall added that production facilities which experience a trip should also be captured, whether under this mechanism or not.
- Ms Mason proposed adding a free-text field for participants' seven-day outlook reports to provide context on maintenance or outages and which parts of the pipeline aren't impacted.

The Chair asked Mr Gillespie if a text field could be included.

Mr Gillespie responded that he would check with AEMO's team and report back.

<i>ACTION: Mr Gillespie to enquire with the AEMO team about providing Market Participants with a free text field when reporting the Capacity Outlook.</i>
--

- Mr McDougall noted that if production, pipeline and storage facility outages were captured somewhere he would be satisfied.

Ms Stone noted that there were two issues to be carried over to meeting #3, one of these being to consider what might need to be adjusted in the GSI Rules to account for other gases.

The Chair asked members if they had considered the complexities involved in introducing other gases to the GSI, citing her concern that if this was overly complex this review may run out of time to consider it.

- Ms Mason noted that APA's experience in responding to legislative changes on the east coast has been difficult and WA is not ready yet. She suggested considering a trigger to review the inclusion of other gases.

Ms Stone asked Mr Moerch if there is a timeline for including other gases in the NGL WA or if it will coincide with adopting other reform packages.

- Mr Moerch noted that timing is uncertain with no set date for other gases. He added that one of the issues faced with implementation in other states was the limited use of other gases, with costs incurred for limited reporting value.

The Chair emphasised that the group should consider appropriate triggers or monitoring measures for other gases, if their inclusion is delayed.

ACTION: 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.

8. PROJECT TIMELINE AND NEXT STEPS

The Chair noted that Action Items would be circulated first, then minutes.

The meeting closed at 12:00 pm.



Department of
Energy and Economic
Diversification

Energy Policy WA

Review of the Gas Services Information (GSI) Rules

Gas Advisory Board

23 October 2025

Working together for a
brighter energy future.

Purpose of this session

1

Provide the GAB with an overview of:

- the GSI Rules Review process and timelines;
- the operation of the working group and activities so far;
- steps still to be undertaken and expected timing; and
- issues and considerations of the working group.

2

To present the GAB with an overview of design proposals and seek members' feedback on key aspects.

Background and context



Purpose of the 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

The working group considered and has recommend changes to the GSI Rules resulting from the above drivers, as well as other issues designed to improve transparency and accuracy of gas volumes and available capacity in WA.



Issues in scope of the review

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

“

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

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

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

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

”

Issues in scope of the review

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

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

Key areas to consider include:

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

Overview of working group activities

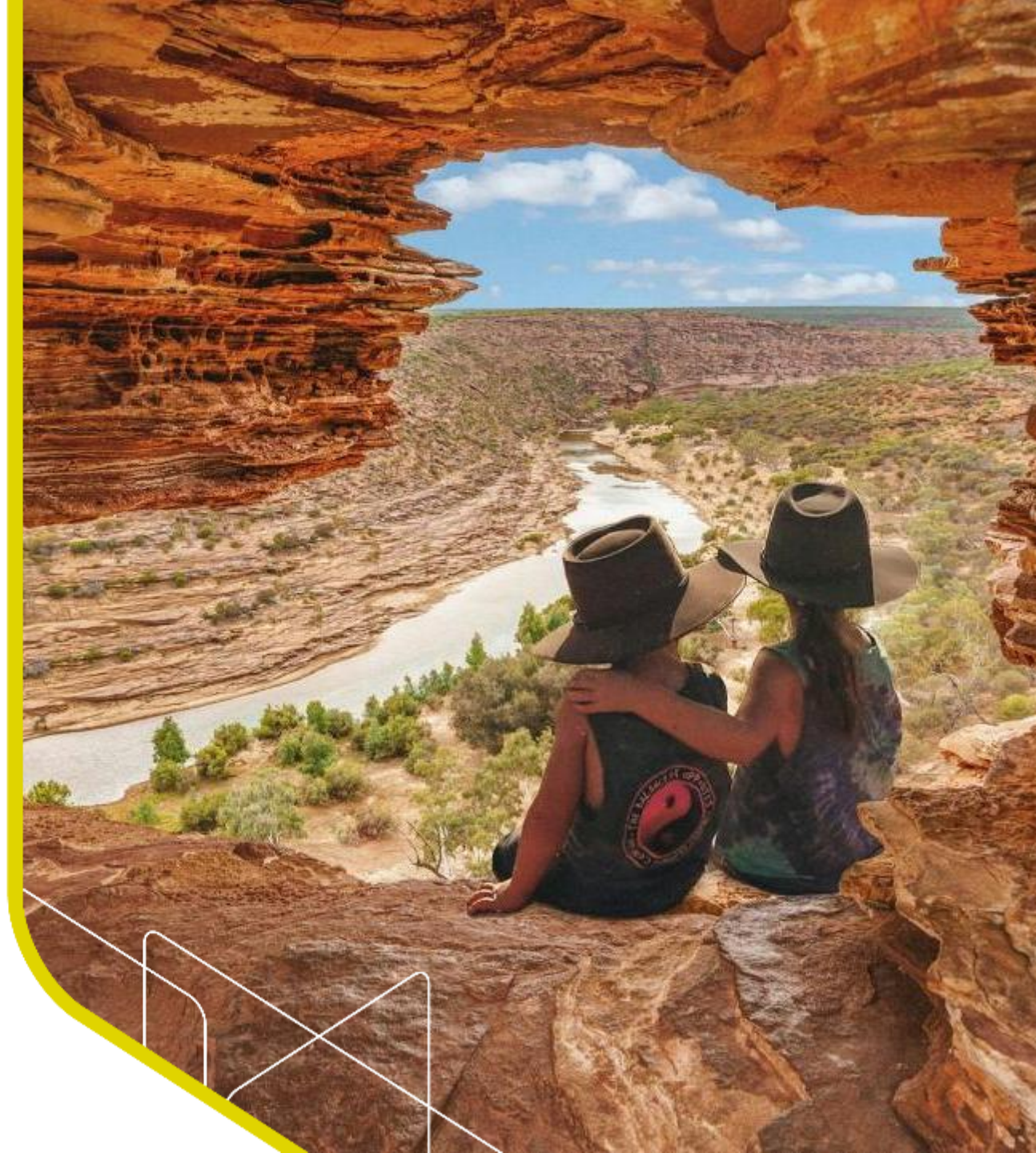
- ✓ Broad representation from industry, with 11 members
- ✓ Supported by three teams across DEED
- ✓ Three meetings held across August and September 2025



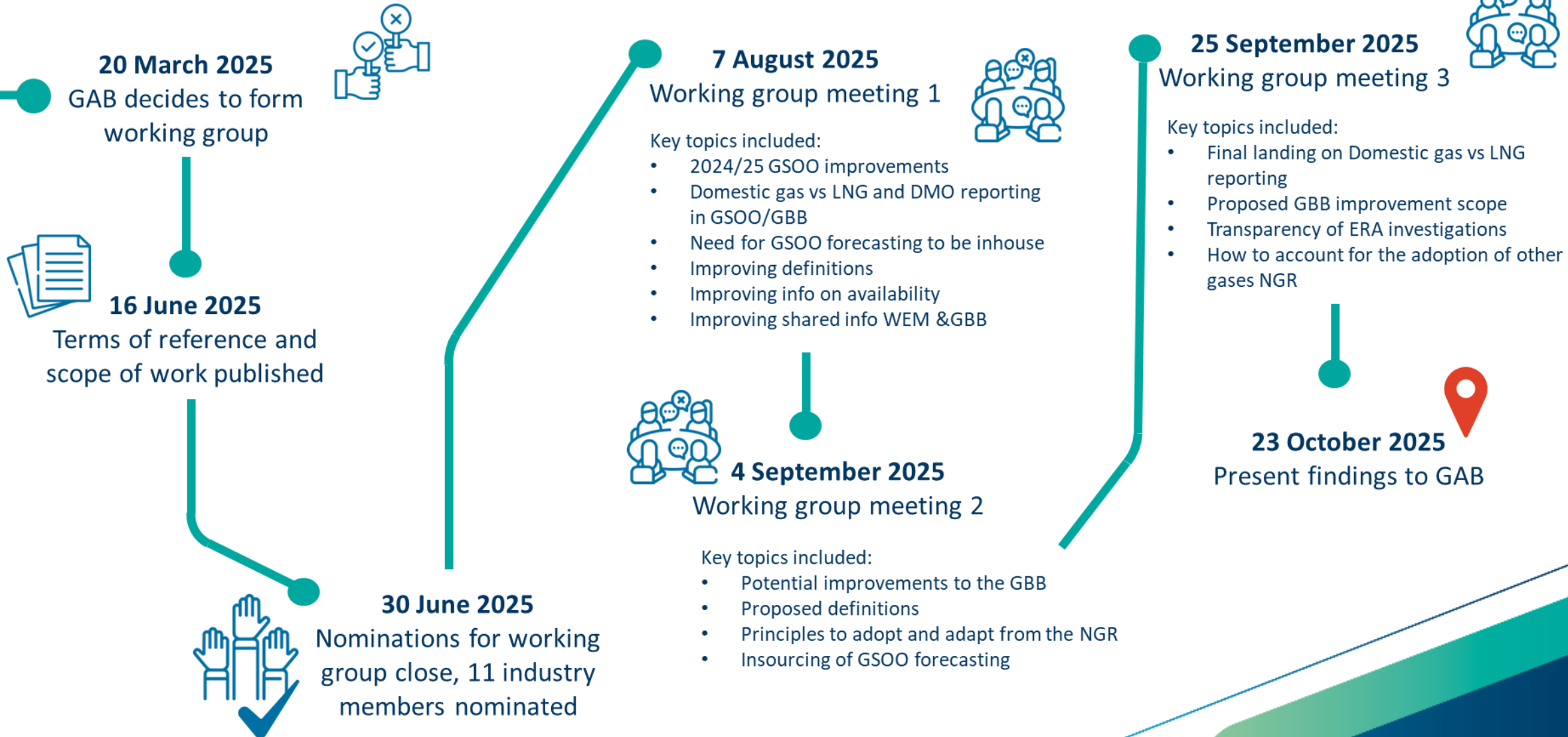
Key issues considered by the working group

- 💡 Transparency of domestic gas market obligations for LNG exporters
- 💡 Opportunities to improve the GBB
- 💡 Improvements to definitions in the GSI Rules
- 💡 Alignment with provisions in the national rules
- 💡 Increasing transparency of investigations
- 💡 Formalising improvements to the GSOO

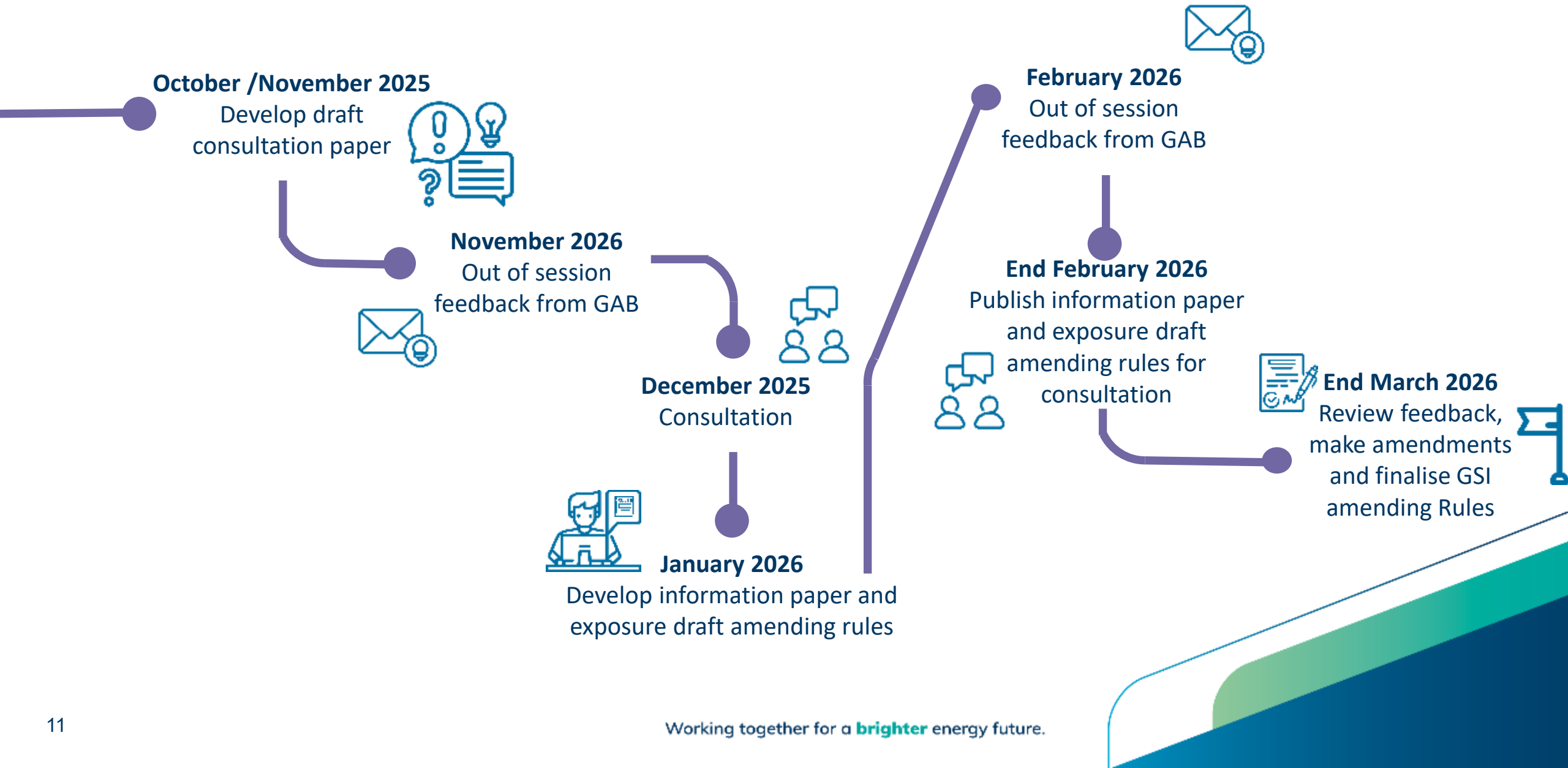
Progress of the review



What we have done so far



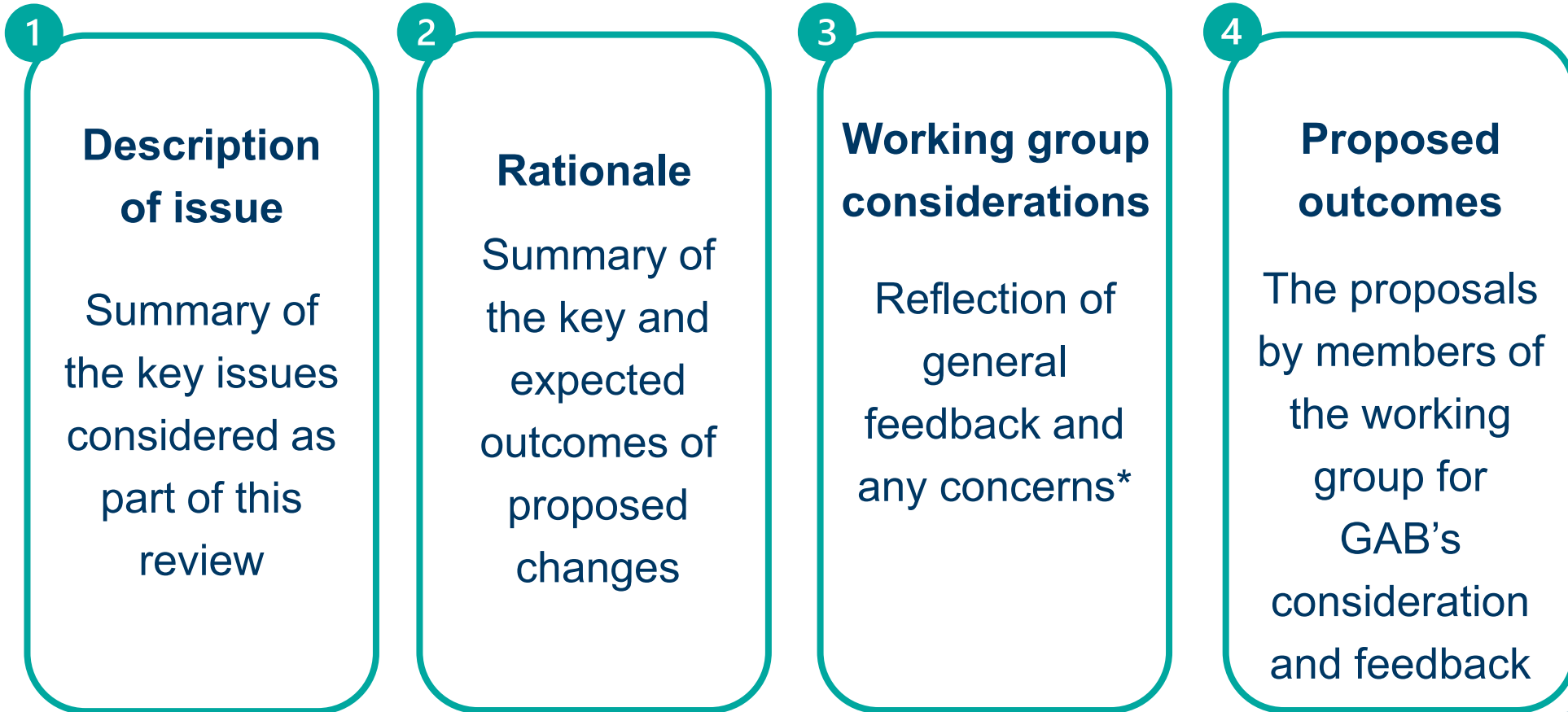
What is still left to do



Working group considerations and 13 proposals



Presentation format for each proposal



*While the input from individual members is listed on the upcoming slides, this may not necessarily reflect the entire working group's view on the matter.

Recommendations related to the GSOO

2024 Western Australia Gas Statement of Opportunities

December 2024

For Western Australia's Gas Market



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 forecast period to 20 years.

Rationale

- Implementing Inquiry recommendations.
- 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.
- Inclusion in GSI Rules will establish the improved GSOO as the new standard and allow AEMO to recover any additional costs.

Formalising improvements to the GSOO

Working group considerations

- AEMO noted all required changes except extending the horizon had been implemented for the 2024 GSOO.
- The extension of the outlook from 10 to 20 years will be implemented for the 2025 GSOO.
- Members were supportive of formalising the changes in the GSI Rules.
- Members raised the need for AEMO to increase the amount of forecasting undertaken inhouse to prevent potential consultant conflicts of interest. AEMO noted GSOO forecasting is planned to be resourced internally from 2026 onwards.
- No concerns were raised with the proposed outcomes.

Proposed outcomes

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

Including information on domestic gas market obligations in the GSOO

Description of issue

- Information related to Domestic Market Obligations, as determined by LNG exports, is reported as part of DEED's WA Domestic Gas Statement but is not reported as part of the GSOO or GBB.
- The 2025 WA Domestic Gas Statement will be improved to include:
 - Expected supply disaggregated by proponent.
 - An expanded expected supply horizon (from 3 to 5 years).
- The WA Government has committed to review the Statement after 24 months (in 2026) with the option to legislate this transparency measure if required.
- Consideration should be given to including (at least) this information in the GSOO as a single source of information.

Rationale

- Increased transparency of overall compliance with the WA Domestic Gas Policy and DMO's, noting most members were unaware of the WA Domestic Gas Statement.
- Little incremental burden for LNG exporters with domestic gas obligations as the information regarding domestic gas supply is already voluntarily being provided to DEED and processes can be aligned.
- There is the opportunity for improved timeliness of the provision of information as it is currently voluntary.

Including information on domestic gas market obligations in the GSOO

Working group considerations

- Some members expressed a wish for more information on LNG exports and domestic gas supply from production facilities, to help understand expected domestic gas availability.
- Some members raised concerns about confidentiality and questioned whether this was within scope.
- Members who supported the proposal wished to have an accessible and consolidated single source of information on progress towards meeting domestic gas obligations.
- Members discussed the appropriate reporting period, annually or more frequently. Some requested the information be published more frequently.
- Producers raised concerns that this reporting could be misleading as different producers have different DMOs.
- Most members were unaware of the WA Domestic Gas Statement until provided with a link, which has begun the process of greater transparency regarding producer domestic gas obligations.
- Some members noted there is no legal obligation and raised concerns that, while there was a commitment to an annual update, the 2024 data was not yet published.

Proposed outcomes

No agreement was reached.

Question for the GAB

Should information regarding the performance of an LNG exporter in meeting their domestic gas obligations be provided in the GSOO and/or on the GBB?

If so, what information would benefit the market (see next slide) and what is the most suitable reporting frequency?

Including information on domestic gas market obligations in the GSOO

Information that could be worth reporting in the GSOO or on 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)	(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			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 GBB



Clarifying definitions to improve consistency and accuracy of information on the GBB

Description of issue

- Some definitions need revisions to clarify what information should be reported, this includes:
 - **Nameplate Capacity:** 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.
 - **Capacity Outlook:** Producers providing Nameplate Capacity rather than an assessment of what will be transported / delivered. The GBB should provide a reasonable forecast of what gas will be available rather than what can theoretically be made available.
 - **Medium Term Capacity Outlook:** The definition refers to the information provision rule relevant to each facility type. Moreover, there is no requirement to update the MTCO for the seven days covered by the CO.
 - **LCA Flag for storage facilities:** The definition of LCA Flag uses the undefined term 'maximum operational outlet capacity' which is not defined.

Rationale

- Improved accuracy and consistency of information.
- More useful and usable information is made available to the market.
- More accurate information will help effectively manage supply in low supply and emergency conditions.
- Strengthened compliance and enforcement of reporting

Clarifying definitions to improve consistency and accuracy of information on the GBB

Working group considerations

- Members considered there to be an issue of interpretation with several definitions in the GSI Rules, this leads to inaccurate information of limited use being reported. It was suggested that definitions be amended to better reflect their original intent.
- Nameplate Capacity definition should not be static reflecting the 'as original' design capacity, it should be updated as and when sustained degradation or improvements become apparent.
- Members were concerned with the overlap between the Medium Term Capacity Outlook and the Capacity Outlook.
- Capacity Outlook should provide a reasonable seven-day estimate of expected quantities to be produced, injected, transported and withdrawn daily.
- Storage facilities should be treated the same as production facilities in the event of a linepack capacity adequacy issue, and where required amend the definition of LCA Flag for these facilities.

Proposed outcomes (see drafting next slide)

1. Amend the definition of Nameplate Capacity to clarify the intent to reflect maximum operating limits, including where relevant any significant modification from original design capacity.
2. Amend the definition of Capacity Outlook to clarify the intent to be 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.
3. Amend the definition of Medium Term Capacity Outlook by adapting the definition that applies nationally, accounting for any changes to the nameplate capacity incl. outages. This will remove the overlap between MTCO and Capacity Outlook.
4. Remove the obligation for storage facilities to provide LCA Flags, consistent with the treatment of a Production facility.

Policy proposal – Amended definitions

Proposed amendments marked up

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 significant modification from original design capacity;
- (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 significant modification from original design capacity;
- (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 significant modification from original design capacity;
- (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 significant modification from original design capacity; and
- (e) for a Storage Facility, to reflect:
 - (i) Production Nameplate Capacity;
 - (ii) Refill Nameplate Capacity; and
 - (iii) Storage Nameplate Capacity.

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~~ are expected to 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 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 ~~can be~~ are expected to :
 - (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 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 ~~can be~~ are expected to be injected from the Facility into GBB Pipelines on the Gas Day, on the Gas Day, based on knowledge of the Facility's capability and availability accounting for all factors that may reasonably impact that estimate, over that time (see rule 72).

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.

LCA Flag means for a Gas Day:

- ~~(a)~~ for a GBB Pipeline (or part of a GBB Pipeline within a Zone), a green, amber or red flag indicating the actual or expected capability of the pipeline to meet the relevant delivery nominations within the Zone for that Gas Day based on the pipeline's linepack and capacity, where:
 - i. a green flag indicates normal operation;
 - ii. an amber flag indicates likely curtailment of interruptible gas flows; and
 - iii. a red flag indicates likely curtailment of firm gas flows; ~~and~~
- ~~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.~~

Opportunities to improve the GBB

Description of issue

- Under subrule 2(2) of the GSI Rules, the GBB is intended to provide visibility of the current and forecast status of natural gas supply, transmission, storage and demand in WA.
- There is an opportunity to enhance the GBB to better achieve the GSI Objectives with improved information transparency and accuracy for both proactive and reactive decision making.
- Operationally there is a lack of visibility to market participants where capacity opportunities may exist.
- Reliability may be compromised, as highlighted during the 2023 supply incident, where the GBB was not a practical tool to understand who and where capacity could be leveraged to maintain supply.

Rationale

- Opportunity to include more useful and usable information that can be made available to the market. (works in tandem with improving definitions)
- Provides transparency on where and when there is spare capacity (production, transport, storage) that could be utilised.
- More accurate information on the GBB will help manage unplanned low or reduced supply events within the supply chain.

Opportunities to improve the GBB

Working group considerations

- Members wished to simplify the information to include net consumption of WA zones.
- Members agreed the solution should provide for a more coordinated and timely response to emergency supply issues. For example, remove the exemption to not update MTCO if CO changes materially.
- Members requested that a free text field would provide proactive context regarding changes to the Seven Day Capacity Outlook, which would avoid confusion for customers.
- Members suggested the East Coast GBB as a good reference point to start looking at aspects such as flow, capacity and utilisation as useful to add to the WA GBB.
- Members also agreed more demand-side information should be included on the GBB (e.g. forecast and actual GPG consumption, and peak consumption in the WEM).
- No firm list of additional information or feedback was provided by working group members.

Proposed outcomes

Subject to further assessment by AEMO regarding cost impact and required effort and practicality:

1. 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).
2. Require AEMO to publish gas related WEM information on GBB including but not limited to demand, supply, linepack and peak consumption.
3. Introduce a free text field to Capacity Outlook reporting.

Questions for the GAB

What additional information (see next slide) would be beneficial to publish on the GBB?

AEMO has noted high complexity in integrating forecast GPG and Nominated Flows data. Is limiting improvements to electricity generation data a reasonable solution?

Opportunities to improve the WA GBB

Information that could be worth reporting on the GBB

Metrics considered by the working group included:

- LNG volumes
- Outage quantity
- Utilisation for all facility types
- Spare capacity
- Gas usage from WEM data dashboard, actual and forecast GPG use and peak

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%
MADE	120	240	50%

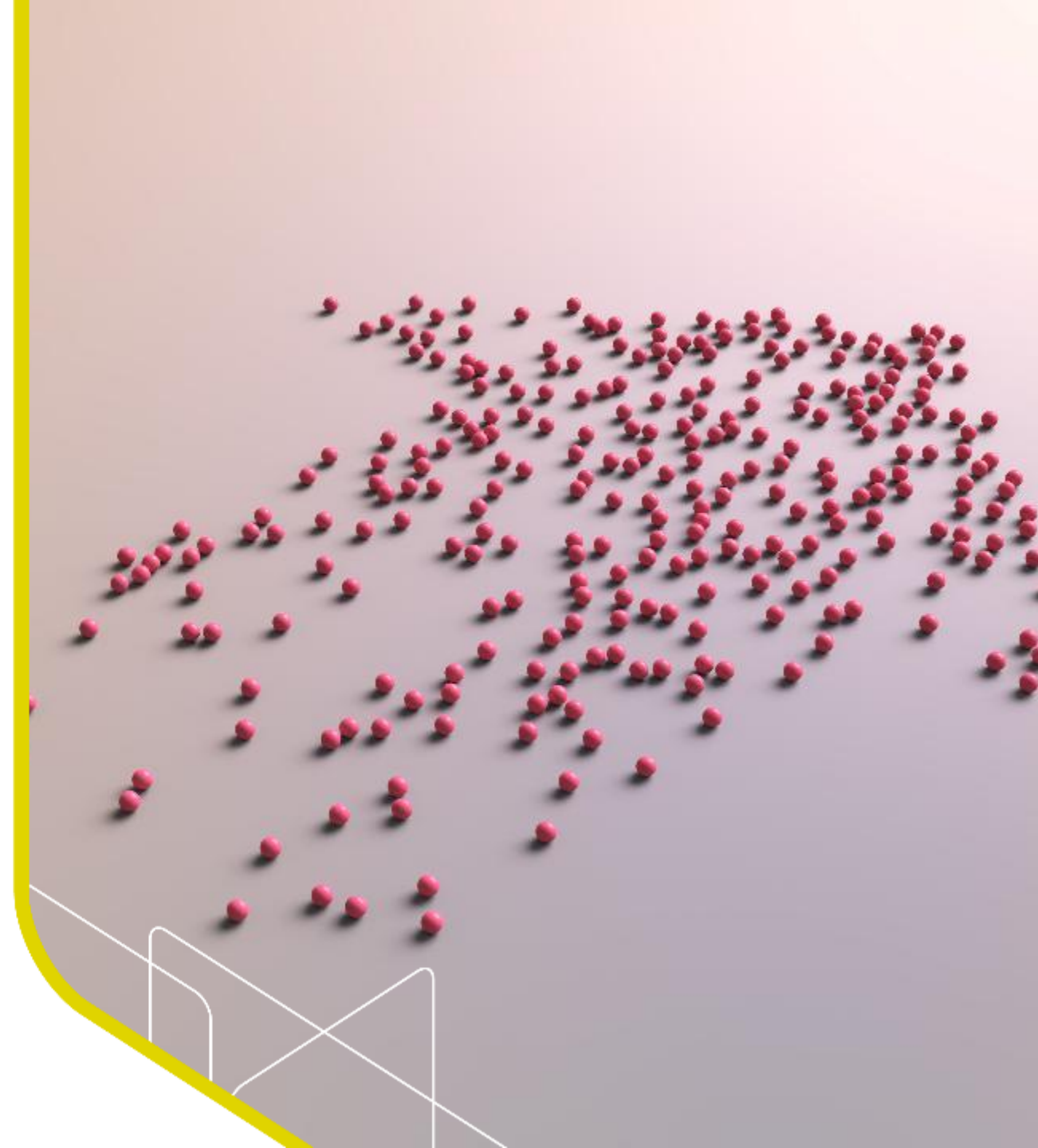
Summary			
Thursday 21 August 2025 Change Date Export			
LOCATION	SUPPLY (TJ)	DEMAND (TJ)	NET (TJ)
QLD	4,324	4,074	250
NSW	0	442	-442
SA	223	225	-2
VIC	984	671	312
TAS	0	59	
NT	72	40	
TOTAL	5,603	5,511	

Production			
Thursday 21 August 2025 Change Date			
FACILITY	FLOW (TJ)	CAPACITY (TJ)	UTILISATION (%)
LANG LANG	24	24	100%
LONGFORD	587	600	98%

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%

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

Alignment with adoption of national rules in WA



Improving consistency with information provisions in the NGL

Description of issue

The GSI provides information on:

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

It doesn't provide information on:

- The level of accuracy required
- What reflects a reasonable estimate
- Obligations around confidential information

There is an opportunity to leverage information principles proposed to be adopted in the WA NGR in the GSI Rules.

Rationale

- Improved accuracy and consistency of information.
- More accurate information will help effectively manage supply in low supply and emergency conditions.
- Strengthened compliance and enforcement.

Improving consistency with information provisions in the NGL

Working group considerations

- Members considered it 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.
- There is an opportunity to align information principles from the NGR / NGR WA into the GSI Rules to bolster information accuracy.
- Overlap between information required under the NGR, and being published on the GBB.
- Principles brought across from information standards in the NGL should set the standard(s) used for reporting on the GBB so that linking from the GBB is sufficient.
- The introduction of explicit information accuracy and provision requirements is not expected to place any material impost on participants.
- A question was raised by a working group member out of session as to whether to adopt the Access Information Standard or BB Information Standard as there are differences between the two which will matter from a compliance perspective, noting that the BB Information standard is less onerous.

Proposed outcomes

1. Introduce principles from the NGR / WA NGR information standard into the GSI Rules to ensure reasonable accuracy of information.
2. Compliment Section 10 of the GSI Act that a duty of confidence is not a reason for non-compliance with the GSI Rules.

Questions for the GAB

Should principles from the NGR information standards be applied to the GSI framework?

If yes, which information standard is more appropriate to model the provisions after?

1. the Access Information Standard; or
2. the BB Information Standard (see next slide for comparison)

Comparison of information standards

36A 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.
- (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 this Division does not comply with the access information standard or this Division, 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 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.

165 Standard for information or data given under this Part or the BB Procedures

- (1) A **BB reporting entity** required by a provision of this Part or the BB Procedures to give information or data to AEMO must:
 - (a) prepare and submit that information or data; and
 - (b) if applicable, maintain any equipment from which that information or data is derived, in accordance with the **BB information standard**.
- ...
- (2) The BB information standard for information or data relating to a:
 - (a) BB facility means 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 BB facility in Australia of that type;
 - (b) BB field interest means the practices, methods and acts that would reasonably be expected from an experienced and competent person qualified to prepare, or supervise the preparation of, petroleum reserves and contingent resources evaluations or audits;
 - (c) BB allocation point means the practices, methods and acts that would reasonably be expected from an experienced and competent person engaged in the determination of allocations of receipts or deliveries of gas in Australia; and
 - (d) facility development project means the practices, methods and acts that would reasonably be expected from an experienced and competent person engaged in the development of a covered gas industry facility in Australia of that type,in each case, acting with all due skill, diligence, prudence and foresight and in compliance with all applicable legislation (including these rules), authorisations and industry codes of practice.
- (3) Where this Part or the BB Procedures requires a BB reporting entity to update information or data provided to AEMO, the BB reporting entity must:
 - (a) do so each time facts or circumstances arise that require the information or data to be updated; and
 - (b) notify the updated information or data to AEMO as soon as practicable after the person becomes aware of the facts or circumstances that require the information or data to be updated and within any applicable timeframe specified in the BB Procedures.
- (4) A BB reporting entity required by a provision of this Part or the BB Procedures to update information or data provided to AEMO must:
 - (a) prepare and submit that updated information or data; and
 - (b) if applicable, maintain any equipment from which the updated information or data is derived, in accordance with the BB information standard.
- (5) AEMO is not required to verify the accuracy of information or data provided to AEMO under this Part.

Allowing for 'other' gases under the GSI Rules

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 during 2026.

Many of the concepts in the GSI would need consideration as to if and how they will need to accommodate gases other than natural gas.

One key consideration is: Does the GSI Act provide the head(s) of power to make such changes?

Rationale

- 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 Rules.

Allowing for ‘other’ gases under the GSI Rules

Working group considerations

- Members acknowledged the need for changes in the GSI Rules, but are concerned with the potential significant nature of those changes.
- Members noted the introduction of other gases is likely to be ‘a way off’ given recent stalling of hydrogen projects.
- While the group understand there may be changes to the GSI Rules, the concern is that the full scope of these changes has not been explored at this stage.
- Members noted the potential impost on the market and participants that may arise from changes, and due to these concerns, on balance, that the review and resulting changes should be deferred to a later date.

Proposed outcomes

1. Undertake a review of the changes that would be required to the GSI Framework to accommodate other gases in the GBB and GSOO triggered by a certain event.
2. Determine the trigger event that would initiate a review to be undertaken by EPWA. This may be, for example, a determination on what constitutes “commercial quantities” of other gases.

Question for the GAB

Is “commercial quantities” an appropriate trigger for a review of the GSI framework (Act, Regulations and Rules) to accommodate other gases?

If so, what approach and/or timing should determine “commercial quantities”?

Other issues



Transparency of ERA investigations

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 investigations for example to the GAB.

Rationale

- More information can be shared regarding the ERA's compliance monitoring and investigations.
- Greater transparency improves market outcomes.
- Sharing of non-confidential information helps resolve known issues with rules, interpretation and operations more quickly.

Transparency of ERA investigations

Working group considerations

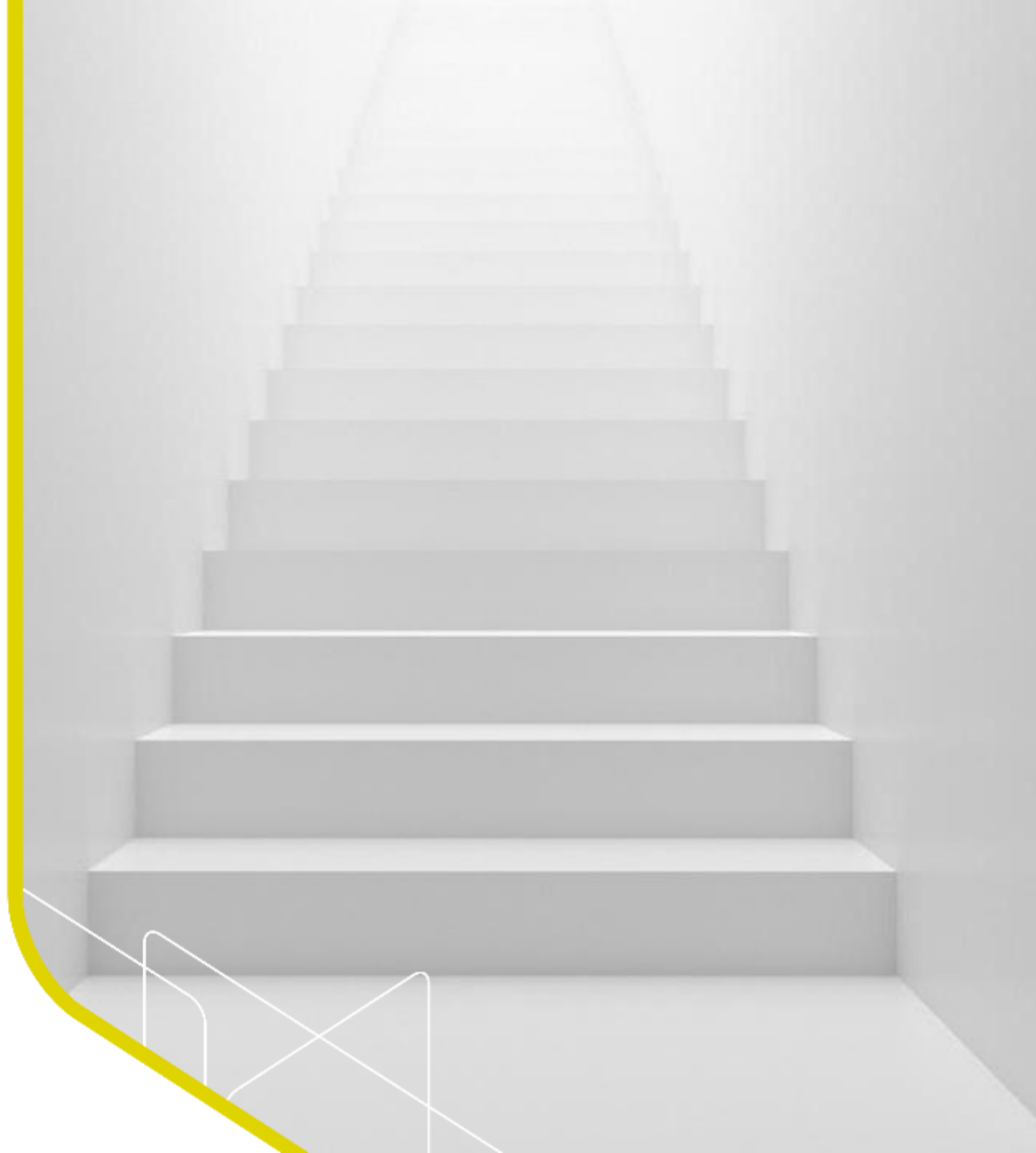
- No concerns were raised with this proposal.
- Members welcomed any opportunities to increase transparency regarding the outcomes of investigations.
- The ERA requested an adjustment to address known weaknesses of the ESM Rules.

Proposed outcomes

1. Adopt and adapt the concept of a public register in ESM Rules based on the relevant clauses to include:
 - Breaches of rules where disclosing the breach outweighs the detriment of doing so.
 - Records of investigations and breaches
 - Details of what is required to be reported as part of investigations
 - Reasons for not including breach in a public register
 - Claims for confidentiality
 - Public register publishing requirements
2. Make changes consistent with future ESM Rules amendments to strengthen this requirement.

Immediate next steps

- 1 GAB feedback: November
- 2 Consultation paper: released November
- 3 Consultation period: end 2025



Thank you



Department of
Energy and Economic
Diversification

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Links to relevant information

Resources related to this review:

- GSI Review [Scope of Work](#)
- GSI Review Working Group [Terms of Reference](#)
- [Meeting papers and minutes](#) from working group meetings
- [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](#)

Agenda Item 6 - Attachment 3 – Summary of Proposed Outcomes and Rationale

Proposed Outcome	Rationale
Formalising improvements to the WA Gas statement of opportunities (GSOO)	
<p>Proposal 1- Extending the WA GSOO forecast period</p> <p>Extend the minimum forecast period for the WA GSOO from “at least 10 years” to 20 years.</p>	<p>Recommendation 16 from the Western Australia’s Economics and Industry Standing Committee’s (EISC) Inquiry into the WA Domestic Gas Policy (the Inquiry) included a recommendation for the WA GSOO be expanded to cover a 20-year forecast period.</p> <p>A key purpose of the Review of the GSI Rules is to review and amend the rules in response to the recommendations pertaining to the GSOO. The revised forecasting timeframe aligns with the Inquiry’s findings and formalises the practical changes that AEMO has already begun implementing.</p> <p>Lengthening the forecast period will assist market participants in making decisions about investment and will increase transparency the forecast supply/demand balance.</p>
<p>Proposal 2 – Decarbonisation forecasting</p> <p>Amend the requirements for the GSOO to also include decarbonisation pathways for gas users and information on gas usage for electricity generation.</p>	<p>Recommendation 17 from EISC’s Inquiry included a recommendation for the WA GSOO to includes forecasts of the decarbonisation pathways for gas users.</p> <p>A key purpose of the Review of the GSI Rules is to review and amend the rules in response to the recommendations pertaining to the GSOO.</p> <p>Western Australia’s decarbonisation pathway, including interactions between gas and electricity, is a critical input to both gas forecasting in the WA GSOO and electricity forecasting.</p>

	Inclusion in the GSI Rules will increase transparency and provide benefits to the market by increasing their understanding of usage patterns and changing behaviours.
Opportunities to improve the GBB Proposals 7-9 are subject to further assessment by AEMO regarding cost impact and required effort and practicality.	
Proposal 3 – Amend definition of Nameplate Capacity Amend the definition of Nameplate Capacity to clarify the intent to reflect maximum operating limits including, where relevant, any significant modifications from the original design capacity.	<p>EPWA considers that there is a varying degree of understanding across the industry regarding the definitions of <i>Nameplate Capacity</i>, <i>Capacity Outlook</i>, and <i>Medium Term Capacity Outlook</i>. This has led to inconsistencies in how information is reported.</p> <p>Some participants are not providing an accurate reflection of the current maximum technical operating limits, but instead the original design capacity.</p> <p>Amending the definition will provide clearer guidance on how <i>Nameplate Capacity</i> should be reported, ensuring it reflects any permanent changes to a facility's physical capability. These changes will support more accurate and consistent reporting across the industry and strengthen compliance, monitoring, and enforcement outcomes.</p>
Proposal 4 – Amend definition of Capacity Outlook Amend the definition of Capacity Outlook to clarify the intent to be a short-term estimate of gas quantities expected to be injected, accounting for all relevant factors including, for example, upstream constraints. Adapt the definition of Short Term Capacity Outlook that applies nationally.	<p>Capacity Outlook should provide a reasonable seven-day estimate of expected quantities to be produced, injected, transported and withdrawn daily. The GBB should provide a reasonable forecast of what gas will be injected rather than what can theoretically be made available.</p> <p>Amending the definition will provide more precise reporting and lead to efficient market outcomes as participants will have better visibility of the quantities of gas expected to be injected.</p>

<p>Proposal 5 – Amend definition of Medium Term Capacity Outlook</p> <p>Amend the definition of Medium Term Capacity Outlook (MTCO) by adapting the definition that applies nationally, accounting for any changes to the nameplate capacity incl. outages. This will remove the overlap between MTCO and Capacity Outlook.</p>	<p>Currently there is no requirement to update the MTCO for the seven days covered by the Capacity Outlook, this means there may be conflicting and inconsistent information. The proposed amendment harmonises the WA GBB with the East Coast GBB and will remove any conflict of reporting between the MTCO and Capacity Outlook. It reflects its actual capability, accounting for any changes to the Nameplate Capacity, including outages.</p>
<p>Proposal 6 – Remove Linepack Capacity Adequacy (LCA) Flags obligation</p> <p>Remove the obligation for Storage Facilities to provide LCA Flags, consistent with the treatment of a Production Facility.</p>	<p>EPWA has received feedback from market participants that the current LCA definition is vague, can be difficult to apply and may be of limited use, as it does not accurately reflect the capabilities of Storage Facilities.</p> <p>Removing the flag and aligning requirements for Storage Facilities with the amended requirements for Production Facilities will better reflect their physical capabilities.</p>
<p>Proposal 7 – Clarify WA Zone Reporting by Including Net Consumption</p> <p>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.</p>	<p>The GBB more accurately reflecting the end point where gas is consumed allows participants to better understand market dynamics and the behaviour of other participants/facilities. This will lead to more efficient market outcomes.</p>
<p>Proposal 8 – Include gas related WEM data</p> <p>Require AEMO to publish gas power generation (GPG) Wholesale Electricity Market (WEM) information on GBB including but not limited to demand, supply, linepack and peak consumption.</p>	<p>Collating gas information related to the electricity market on the GBB allows participants to better understand market dynamics and the behaviour of other participants/facilities.</p> <p>AEMO has considered improvements to the WEM Data Dashboard to provide forecast information related to GPGs. There is high complexity in integrating this with GBB Nominated Flows data and, as such, AEMO recommends that any improvements are limited to electricity generation data.</p>

<p>Proposal 9 – Improve Capacity Outlook reporting</p> <p>Introduce a free text field to Capacity Outlook reporting on the GBB.</p>	<p>Not all outages and/or maintenance issues impact the entirety of a pipeline. Participants have made EPWA and AEMO aware that the ability to report their Capacity Outlook with more detail would help the market to better understand how much gas is available, when and where, in the event of an outage or maintenance that impacts the Capacity Outlook.</p>
<p>Improving consistency with information provisions in the National Gas Law (NGL)</p>	
<p>Proposal 10 – Introduce Information Standard principles</p> <p>Introduce principles from the NGR / WA NGR information standard(s) into the GSI Rules to ensure reasonable accuracy of information.</p>	<p>Introducing principles that mirror the information standard(s) in the National Gas Rules (NGR) will improve the accuracy and consistency of information. Introducing a reasonableness test for the accuracy of information will also support more effective compliance and enforcement.</p>
<p>Proposal 11 – Introduce a Duty of confidence clause</p> <p>Introduce a clause clarifying that a duty of confidence is not a reason for non-compliance with the GSI Rules.</p>	<p>Section 10 of the GSI Act contains a provision that prevents a person from relying on a duty of confidence as a reason for refusing to comply with an obligation to provide information under the Act.</p> <p>EPWA considers that including a corresponding requirement in the GSI Rules will reinforce this obligation, provide greater clarity to participants, and support consistent compliance with information provision requirements.</p>
<p>Other Gases Package – Potential implications for the GSI Framework</p>	
<p>Proposal 12 ‘Other gases’ review trigger</p> <p>Determine a trigger event to initiate a review of changes required to accommodate other gases in the GBB and GSOO.</p>	<p>While it is important that the WA gas market prepare for the integration of other ‘covered gases’, such changes are time and resource intensive. Participants made it clear that these changes would have limited benefit at this time so the approach of introducing a trigger to review the GSI Rules was suggested.</p>

Transparency of ERA investigations

Proposal 13 - Public register on investigations

Adopt and adapt the concept of the public register in the Electricity System and Market Rules in the GSI Rules.

The ERA is not currently required 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. Adopting a public register, similar to the ESM Rules, will allow the ERA to share more information regarding its compliance monitoring and investigations.

The sharing of non-confidential information will help resolve known issues with rules' interpretation and operations in reasonable timeframes and increase transparency regarding outcomes of investigations.

DRAFT

Agenda Item 7: Overview of Rule Change Proposals (as at 9 October 2025)

Gas Advisory Board (GAB) Meeting 2025_10_23

- Changes to the report provided at the previous GAB meeting are shown in **red font**.
- The next steps and the timing for the next steps are provided for Rule Change Proposals that are currently being actively progressed by the Coordinator.

Rule Change Proposals Commenced since the last GAB Meeting

Reference	Submitted	Proponent	Title and description	Commenced
GRC_2024_01	28 August 2024	AEMO	AEMO's Allowable Revenue Framework (ARF) A rule change proposal by AEMO, which sought to replace the current the Allowable Revenue and Forecast Capital Expenditure processes outlined in Part 7, Division 1 and 2 of the GSI Rules. The Coordinator's decision was to reject the Rule Change Proposal GRC_2024_01 and make Amending Rules to suspend AEMO's current ARF until market fees can be set under a new framework. The Amending Rules were subject to the Minister for Energy's (Minister) approval. The Minister approved the Amending Rules on 17 April 2025. The Coordinator's ongoing ARF Review seeks to implement a new and fit-for-purpose framework.	23 April 2025

Approved Rule Change Proposals Awaiting Commencement

Reference	Submitted	Proponent	Title and description	Commencement
None				

Rule Change Proposals Rejected since the last GAB Meeting

Reference	Submitted	Proponent	Title and description	Rejected

Rule Change Proposals Awaiting Approval by the Minister

Reference	Submitted	Proponent	Title and description	Approval Due Date
None				

Formally Submitted Rule Change Proposals

Reference	Submitted	Proponent	Title and description	Urgency	Next Step	Date
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Fast Track Rule Change Proposals with Consultation Period Closed

None						
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Fast Track Rule Change Proposals with Consultation Period Open

None						
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Standard Rule Change Proposals with Second Submission Period Closed

None						
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Standard Rule Change Proposals with Second Submission Period Open

None						
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Standard Rule Change Proposals with First Submission Period Closed

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Reference	Submitted	Proponent	Title and description	Urgency	Next Step	Date
None						
Standard Rule Change Proposals with the First Submission Period Open						
None						

Pre-Rule Change Proposals

Reference	Proponent	Title and Description	Status	Next Step
None				