



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

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

<b>Attendees</b>	<b>Representing in GSIRRWG</b>	<b>Comment</b>
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 Liddelov	Shell Energy	
Brian Pridgen	Australian Energy Producers	
Vivek Karia	Department of Energy and Economic Diversification	
Angelina Cox	Woodside	Proxy for Ana Stankovic
<b>Other attendees</b>	<b>From</b>	<b>Comment</b>
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
<b>Apologies</b>	<b>From</b>	<b>Comment</b>
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 Liquified 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.

***ACTION: Mr Gillespie to enquire with the AEMO team about providing Market Participants with a free text field when reporting the Capacity Outlook.***

- 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.**