



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

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| <b>Date:</b>     | 25 September 2025      |
| <b>Time:</b>     | 9:30am – 11:25am       |
| <b>Location:</b> | 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                                  |
| Hamish McKay    | Australian Energy Market Operator (AEMO)                 | Proxy for Alex Gillespie                             |
| Katya Grimston  | Economic Regulation Authority (ERA)                      | Proxy for Frances Hobday                             |
| 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 (DEED) |  |
| Angelina Cox    | Woodside   | Proxy for Ana Stankovic                              |
| Jason Ridley    | Chevron  |  |
| Other attendees | From   | Comment  |
| Rasmus Moerch   | EPWA   | To provide context on the integration of the WA NGLA |
| Sanna Pember    | EPWA   | GSIRRWG Secretariat                                  |
| Rory Hannon     | EPWA   | GSIRRWG Secretariat                                  |
| Apologies       | From   | Comment  |
| Jack Rowe       | APA Group  |  |
| Ana Stankovic   | Woodside Energy  |  |
| Frances Hobday  | ERA  |  |
| Alex Gillespie  | AEMO   |  |

## **1. WELCOME**

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

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

## **2. MEETING APOLOGIES AND ATTENDANCE**

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The Chair noted the apologies and attendance as listed above.

## **3. RECAP OF MEETING 2 AND ACTION ITEMS**

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The Chair noted the open actions assigned to AEMO and invited Mr McKay to address those.

### **Action Item 5 – WEM Data Dashboards and Gas Bulletin Board (GBB)**

- Mr McKay noted that AEMO:
  - Supports, in principle, publishing useful data on the GBB, including data from the WEM data dashboard.
  - has some concerns about duplicating data across multiple platforms.
  - is open to estimating the cost of including specific data or visualisations on the GBB.
- He emphasised that more detailed input from participants is needed before AEMO can undertake further assessment regarding cost impact and required effort and practicality.
- Mr McDougall noted that it was his understanding that working group members wanted to see consumption figures for Gas Powered Generation (GPG) facilities included on the GBB.

The Chair noted that this may not be the only information being proposed for inclusion and suggested discussing this in detail under the relevant agenda item.

### **Action Item 13 – Improvements to the GBB**

- Mr McKay noted that Mr Gillespie had spoken with the AEMO team, who confirmed they will estimate the cost and effort for potential GBB additions once they receive the working group's 'Wishlist'.

The Chair noted that no further issues were raised.

### **Action Item 15 – Free text field in Capacity Outlook reporting on the GBB**

- Mr McKay noted that there are some potential challenges with including a free text field, particularly around its format and implementation. He noted that, unlike the Medium Term Capacity Outlook, which allows comments for specific dates, the Seven Day Outlook covers multiple dates, raising the question of whether the text field should apply to individual days or the entire period.
- He added that AEMO was open to feedback from working group members and would aim to accommodate the solution they considered most appropriate.
- Ms Mason noted Mr McKay's concerns around exactly how the change would be implemented by stating that including the free-text field for all seven days of the Capacity Outlook reporting would be an appropriate solution.

- Mr McKay noted that there may be challenges around the reporting of the free text itself but that he was happy to support this change if there is demand for it amongst the group.
- He added that AEMO will be packaging all potential GBB changes together as a single project before doing any further assessment regarding cost impact and required effort and practicality.

The Chair noted that the pipeline operators wanted to have increased transparency around the reported outlook figures. She added that this proposal would be included in the draft Consultation Paper.

#### **4. POLICY PROPOSALS NEEDING CLARITY**

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##### **Reporting of Liquefied Natural GAS (LNG) exports and domestic gas supply**

Ms Stone presented slide 10.

- Mr Ridley questioned how 'Agreement Length' would be defined precisely.

Ms Stone noted that nothing has been proposed yet.

- Mr Ridley replied that he was unsure of the right approach, noting that operators' estimate of end-of-field-life is a potential approach but possess uncertainty.
- Mr McDougall noted that Mr Ridley raises a fair point and that Agreement Length may not be the best treatment. He agreed that estimated end-of-field-life or another approach may be most appropriate. He added that it was still his desire to have LNG exporters report their LNG exports alongside their domestic gas sales so that the two may be compared directly.
- Mr Rafferty noted that estimated end-of-field-life is a measure with a lot of uncertainty and different companies working on the same project may even take varying views on what is the correct estimate of this.
- Mr Pridgen noted that he was broadly supportive of the transparency measures being proposed under the condition that the disclosure remains the same as the information which is currently reported to the Department of Energy and Economic Diversification (DEED). He added that DEED has recently added to the information requirements of the WA Domestic Gas Statement (WADGS) and that the WADGS would be reviewed again next year.
- Mr Pridgen reiterated his view that this review is not the appropriate avenue to litigate LNG exporters performance against their Domestic Gas Obligations (DMOs) and that introducing a requirement to provide that information would stray into that territory and outside the scope of this review.
- Mr Rafferty agreed.

The Chair summarised that the potential questions were as follows:

- Should the WADGS evolve as a DEED report and not a formalised reporting obligation under the GSI Rules; or
- Should the GSI framework seek to address potential gaps in the WADGS and create a formalised reporting obligation.
- Mr McDougall stated that the introduction of this requirement addresses directly the recommendations of the DomGas inquiry by improving the GSI framework to increase

transparency of information. He noted that the WADGS was difficult to locate and members including himself had previously been unaware of its existence.

The Chair asked Mr McDougall, given that the WADGS is being improved by DEED, what essential gap still exists that needs to be addressed.

- Mr McDougall noted that transparency could be improved by including information from the WADGS on the GBB and in the Gas Statement of Opportunities (GSOO).

The Chair asked if the information currently provided to DEED for the WADGS was provided to AEMO for the GSOO, and whether this would be sufficient.

- Mr Dougall agreed that it would be.
- Mr Ridley noted that inconsistency in state agreements across assets would lead to a deceptive outlook if LNG exports were reported along domestic gas sales. He added that the WADGS, in its current form, is sufficient for informing people of the performance of companies against their DMOs.

The Chair asked members if LNG export values were reported elsewhere.

- Mr Ridley and Mr Pridgen confirmed that these figures were reported to DEED on a confidential basis.
- Mr Pridgen noted that DEED has oversight of compliance with DMOs and there are mechanisms that exist for addressing non-compliance. He added that the WADGS had been developed by DEED in tandem with producers during the DomGas Inquiry. He argued that the proposal did not have a clear purpose and questioned what benefit the increased transparency would bring.
- Ms Liddelow agreed that DEED manages compliance with the DMOs.

The Chair was surprised that data on LNG exports out of WA from the various operators was not publicly available already. She invited Mr Karia to comment.

- Mr Karia explained that the two key changes to the WADGS were:
  - Disaggregating expected supply by proponent; and
  - Expanding the expected DomGas supply time horizon.
- He added that the new WADGS would also include updated figures, asset performance information and DomGas marketing.

The Chair noted that it was clear from the discussion that members would not reach a consensus on this proposal, with working group members making their views clear.

### **Opportunities to improve the WA GBB**

Ms Stone presented slide 14, asking members for comments.

The Chair requested that the group discusses the item regarding integration of elements of the WEM Data Dashboard, noting that Mr McDougall had previously suggested the inclusion of data on GPG consumption.

- Mr McDougall noted that his request was formed based on AEMO being hesitant to replicate data. He added that AEMO's hesitance was understandable, but that GPG is a key element of gas consumption in the current market and so should be reflected on the GBB.

The Chair asked for clarification of what exactly was being proposed.



- Mr McDougall explained that participants regularly receive 'no negative imbalance' warnings during periods when gas powered generation is high. Being able to see current and projected gas consumption from gas powered generation would help participants prepare for and respond to these events appropriately.

The Chair noted that AEMO may not have visibility of gas consumption at these facilities but can provide information on scheduled electricity generation from GPG Facilities.

- Mr McKay agreed that including information on GPG would improve the GBB. He noted that there was a challenge in relating GPG output forecasts with quantities of gas consumption. He confirmed that AEMO does not have visibility of exact figures on gas consumption but can more easily provide a forecast of GPG output.

The Chair questioned if pipeline operators providing gas consumption figures from the respective connection points would be sufficient for AEMO to calculate figures to address Mr McDougall's original proposal.

- Mr Rafferty noted that GPG is currently the biggest consumption swing on the Dampier to Bunbury Natural Gas Pipeline (DBNGP) and so is the most important thing to have some extra visibility on. He added that calculating exact consumption would be tough for AEMO given variation in the heat rates and gas lateral configurations of different GPG facilities.

The Chair asked Mr McKay if converting electricity generation figures for GPG facilities into a gas consumption figure would be an exceedingly complication calculation to do, noting that pre-dispatch schedules can be adjusted close to real time.

- Mr McKay noted that expected generation for each GPG facility could be obtained easily but that there are many factors that do change, such as forecast demand. The amount of variation means that if AEMO does begin to publish expected GPG figures, these could frequently change, and participants should be aware of that uncertainty.

The Chair asked what additional data would be needed to create a useful metric that participants could use to understand potential GPG gas consumption.

- Mr McKay noted that he was supportive of splitting out gas generation from the WEM Data Dashboard, with a seven-day forecast not specifically linked to expected gas consumption a potential minimum product. However, combining this with nominated flows or any other form of gas consumption data to create the volume of actual or forecast gas used by GPG would be potentially very difficult.

The Chair noted that a lack of visibility around which fuel source dual-fuel facilities were running on could also be a challenge in providing accurate real-time estimates.

- Mr McKay agreed.
- Mr McDougall asked if it was possible to use past gas consumption and electricity generation data from GPG facilities to derive a formula that could accurately calculate how much gas their future electricity generation might consume.

The Chair explained that the difficulty was because GPG facilities burn varying quantities of gas at different MW quantities of electricity generation due to differing heat rates/efficiencies and plant configurations.

- Mr McKay asked members, if AEMO was able to derive an accurate forecast for a MW to TJ conversion, would there be confidentiality concerns in the gas market.

- Ms Liddelow noted that this might be the case, but that she couldn't be certain. She added that the group should be clear about the potential benefits of this proposal and if they outweigh the potential implementation costs.

The Chair noted that the proposal was a good idea, in principle, but that a generic formula was unlikely to be sufficient in producing an accurate outcome. In the meantime, bringing across a forecast of individual GPG behaviour into the GBB could prove useful.

She reiterated some of the complexities in calculating gas consumption for individual facilities.

Ms Stone noted that this was the only proposal that had been raised by members under the agenda item regarding opportunities to improve the GBB.

***ACTION: AEMO to assess providing electricity generation data for GPG on the GBB and/or calculating gas usage by GPG using load forecast and Nominated Flows data.***

## **5. NEW ITEMS TO BE DISCUSSED**

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### **Public register for ERA investigations under the GSI Rules**

Ms Stone presented slide 16 and asked members for comments.

- Ms Grimston noted that the public register under the Electricity System and Market (ESM) Rules had led the ERA to conclude that, due to the small market, they could only share limited information without revealing the investigated entity.
- She expressed concern that the gas market was similar and would experience the same issues. She noted that this would limit the usefulness of such a register but added that the usage of a breach register was different as this reflected the outcomes of investigations.

The Chair asked Ms Grimston to clarify her concerns with the current proposal. She highlighted that the WEM Effectiveness Report emphasised the need for changes to the ESM Rules to allow the ERA to publish investigation details, with the introduction of an explicit requirement.

- Ms Grimston responded that there was no issue per se, but that if the public register takes the same form and operates in the same manner as it does under the ESM Rules, it will be of limited use due to confidentiality restrictions.

### **NGR 'other gases' provisions**

Ms Stone and Mr Moerch presented slide 17.

Mr Moerch 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) (Gas Pipelines) Act 2022 and the Statutes Amendment (National Energy Laws) (Other Gases) Act 2023 (Other Gases Package) in WA and public consultation is anticipated to in the next couple of months.

Ms Stone noted broader challenges, such as the need for separate facilities for blending gases, and emphasised that the rules must account for the introduction of other gases. She sought clarification and feedback from members on necessary actions and timing.

- Mr Rafferty noted that timing is the predominant issue, his view being that incorporation of 'other gases' on a commercial scale is a way away and including these provisions wouldn't have a noticeable impact on overall market transparency for at least a decade.

- He added that time and efforts to improve transparency would be better spent in other areas of the GSI framework.

The Chair noted that the review is looking at a trigger for these provisions and that the market doesn't want to be in a position where someone wants to begin blending 'other gases' and no work has been done to review the GSI Rules to prepare for this.

- Mr Rafferty noted that physical capability was the most important factor. Using hydrogen blending, as an example, he noted that this was not yet possible at scale.
- Ms Mason supported Mr Rafferty's comments and noted that, in the case of APA, there would be years' worth of technical trials and studies before deciding that its transmission pipelines were capable of handling hydrogen. She added that east coast facilities that are currently doing work in this area are on a small scale and all downstream of the transmission pipelines.

The Chair noted that the group still needs to arrive at some form of trigger.

- Mr Hughes noted that it sounded as if 'commercial quantities' could form part of an appropriate trigger to begin a review.

The Chair noted that this could be included in the Consultation Paper.

## **6. ITEMS TO BE FINALISED**

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### **Improving clarity of definitions**

Ms Stone presented slide 4.

She asked Mr McKay if aligning the definition of Medium Term Capacity Outlook (MTCO) with that used in the NGR (the 12 months immediately following the seven-day Capacity Outlook period) would be problematic to incorporate on the WA GBB.

- Mr McKay replied that adjusting the definition of MTCO would make sense given that MTCO is a measure of Nameplate Capacity minus outages while Capacity Outlook is a measure of expected flows and, therefore, separating the two is logical.
- Mr McDougall noted that MTCO should not be equal to Nameplate Capacity and expressed his concerns with how some facilities were reporting their MTCO. He added that MTCO should give an indication of what it anticipated to flow from a facility.

The Chair noted that:

- the Nameplate Capacity is a well understood concept, taking into consideration any permanent changes;
  - the MTCO is what the facility is actually capable of producing taking into account maintenance and other temporary outages (Nameplate Capacity with all planned and unplanned maintenance reduced from that); and
  - the Capacity Outlook is showing what the expected flows from a facility are.
- Mr McDougall commented that for MTCO to refer to Nameplate Capacity in any sense is incorrect and represents erroneous reporting. He noted that to refer to MTCO as nameplate minus outages is not appropriate and that current reporting practices are not in line with the GSI framework.

The Chair queried Mr McDougall views as to the difference between the MTCO and Capacity Outlook.

- Mr McDougall responded that how proponents choose to meet their customer sales is entirely up to them and that facilities have levels of output that they can be reasonably expected to operate at over a period. His view is that the MTCO should be representative of the expected operating capacity over a 12-month period while the Capacity Outlook should reflect short term customer sales decisions that impact the actual flows out of a facility in the next seven days.
- Mr Ridley noted that Mr McDougall's representation of domestic gas supply decisions was accurate and that during lower demand periods Chevron wouldn't have sufficient demand to fulfill all capacity from, for example, Gorgon and Wheatstone. He enquired about the regularity of reporting for MTCO and Capacity Outlook.

The Chair noted that MTCO and Capacity Outlook currently have two different timeframes. She added that Capacity Outlook is the most frequently updated one, with updates daily by 9:00 am or as soon as practicable if it changes during the day.

- Mr Ridley noted that the current proposal appeared to be shifting the definition of Capacity Outlook so that it represents what is 'expected' to be delivered from an asset rather than what 'can' be delivered.

Ms Stone noted that his understanding was correct.

- Mr Ridley sought to clarify on what level this information would be consolidated and reported, noting that projects are typically comprised of many JVs.

The Chair replied that the facility operator is responsible for reporting expected flows based on nominations received from those JVs.

- Mr Ridley asked if there were currently any instances when the figure reported is less than the Nameplate Capacity excluding reductions due to maintenance

The Chair noted that some facility operators report what they expect their output will be and others do not. This was the rationale for this proposal, trying to achieve consistency in reporting.

- Mr Ridley noted that during off-peak periods Chevron will often, in its week ahead nominations, assume lower than total capacity. However, if demand is higher on a particular day, its Capacity Outlook would increase back to total capacity. He added that if people were aware of the limitations of the Capacity Outlook, he saw no issue in adjusting the definition.
- Mr McDougall agreed and noted that the intention was to provide better guidance for reporting, not to penalise participants for self-reporting incorrectly.

The Chair summarised that:

- Nameplate Capacity will be equal to what a facility is capable of producing if it is not experiencing an outage;
- MTCO is the outlook for a 12-month period (following the seven-day Capacity Outlook period) of what is expected to be produced, taking into account outages; and
- Capacity Outlook should be most accurate because it needs to be updated every day for the coming seven days and, as soon as practical, if there are any changes.

The Chair asked if members were happy with these definitions.

- Mr McKay noted that MTCO could play a role in identifying if there is headroom at facilities during emergency situations. During gas supply disruptions, MTCO could provide an indication of the expected supply of a facility versus its capability.



The Chair asked Mr McKay, if the MTCO is an indication of expected supply, shouldn't it capture the effects of any outages, as the facility would not be capable of operating at normal levels. She queried if MTCO could be a combination of what is expected to flow through a facility and the actual outages that apply to the facility.

- Mr McKay replied that he would be interested in hearing from the group on this point, noting that he is in favour of more transparency around gas flows. He added that members should consider how the GBB could best facilitate the identification of available headroom if a GBB Emergency Management Facility (EMF) is in place.
- Ms Stone agreed with Mr McKay and added that potential improvements to the GBB also include utilisation and the publication of actual outage information.

The Chair noted that these definitions have been causing issues in the market since 2021 due to inconsistency of reporting. She sought to clarify if members believed that MTCO should represent the actual capacity available at a facility that's not going to be utilised – capturing both outages and what is planned to go through the facility.

- Mr McKay replied that this explanation seemed to be at odds with the issues originally raised by Mr McDougall.

Ms Stone questioned how much more accurate an MTCO based on 'expected' flows could be compared to Nameplate Capacity, given it is based on a 12-month timeline.

- Mr McDougall noted that technical capabilities, such as on- and off- shore deliverability of different gas wells can impact a facility's ability to run at its Nameplate Capacity and that this difference should be reflected in the MTCO.

The Chair summarised the proposed changes as follows:

- The MTCO is what the facility is actual capable of producing, not accounting for what will flow through that facility on a particular day, considering changes to its Nameplate Capacity including outages.
- Capacity Outlook should tell us what is planned to be the output from a facility over the coming seven-day period, updated daily.

Members agreed.

Ms Stone noted the proposal on slide 4 to adjust the clause related to Linepack Capacity Adequacy (LCA) Flags, adopting the definition of maximum operational outlet capacity used in the National Gas Rules.

She asked Ms Mason, who had originally raised the issue concerning LCA Flags, if this solution was sufficient.

- Ms Mason replied that she required clarity on this point.

Ms Stone presented slide 23, noting the proposed change.

- Ms Mason noted that the confusion arises mainly from the language surrounding the LCA Flags themselves, stating that 'three to seven days' doesn't provide clear guidance.

Ms Stone asked Ms Mason how the clause could best be adjusted.

- Ms Mason replied that perhaps a time-based flag was not an appropriate measure of capacity. She added that the group should consider what information is beneficial to the market and then the purpose this clause serves.
- Mr Rafferty asked members why a storage facility should be treated any differently to a production facility in matters of withdrawal reporting, noting that in practical terms they

serve the same end and perhaps it would make the most sense to align their reporting requirements.

The Chair noted that Mr Rafferty had raised a good point, asking why reporting requirements for storage facilities were aligned with pipelines and not production facilities. She asked members if the requirements should be aligned with production facilities and to flag any potential drawbacks to this approach.

- Ms Mason noted that she wasn't necessarily stating that requirements for storage facilities were aligned with that of pipelines, but that LCA Flags don't exist on the east coast for storage facilities, and she would be open to align their reporting requirements with those of production facilities. She reiterated the confusing nature of LCA Flags.

The Chair asked members for comment, noting that the fundamental question here was if withdrawals from storage facilities should be aligned with production facilities and if not, how the LCA Flag clause should be amended.

- Mr McKay noted that aligning the two would necessitate removing the LCA Flag for storage facilities but keeping it for pipelines.
- Mr Rafferty agreed, adding that withdrawals not injections on a given day were the markets prime concern and reporting should reflect this. He noted further that a simpler and more consistent approach would benefit the market.
- Mr McKay agreed with Mr Rafferty's sentiment and added that from AEMO's perspective Red LCA Flags for storage don't elicit the same urgency of response as those for pipelines, indicating that the current clause doesn't result in the same outcome or response for storage and pipeline facilities.

The Chair asked if members would prefer to remove the LCA Flag obligations for storage facilities and align their reporting requirements with those of production facilities so that the Capacity Outlook and MTCO provide the appropriate capacity and supply signals.

- Members agreed that removing the LCA Flag seemed most appropriate, with Ms Mason noting that she would examine the changing obligations for production facilities before fully supporting the change but was comfortable with it in principle.

## **7. OTHER ISSUES / OPPORTUNITIES**

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No further comments were raised by members.

## **8. PROJECT TIMELINE AND NEXT STEPS**

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The Chair noted that a truncated version of this presentation and the proposals would be presented to the Gas Advisory Board (GAB) for discussion at its 23 October 2025 meeting.

She added that these papers would take note of the generally agreed proposals, proposals needing further development, proposals discussed without resolution and matters to be addressed by AEMO.

The Chair clarified that a draft Consultation Paper would be developed simultaneously and shared with the GAB out of session.

- Mr Pridgen asked if members would be able to see the Consultation Paper before it is publicly released.

The Chair responded that it could be shared with the group, but without requesting comments.

**The meeting closed at 11:25 am.**