

Minutes

Meeting Title:	Gas Advisory Board (GAB)
Date:	23 October 2025
Time:	1:30 – 3:00pm
Location:	Online, via TEAMS

Attendees	Class	Comment
Sally McMahon	Chair	
Amy Tait	Australian Energy Market Operator (AEMO)	
Hamish McKay	AEMO	Presenter for item 4
Chris Alexander	Small-Use Customer appointed by the Minister	
Paul Power	Coordinator of Energy Representative	
Trent Leach	Pipeline Operators and Owners	Proxy for Rachael Smith
Beck Mason	Pipeline Operators and Owners	
Ana Stankovic	Gas Producers	Proxy for Steve Parks
Dave Rafferty	Gas Producers	
Allan McDougall	Gas Shippers	
Richard Beverly	Gas Shippers	
Nicholas Whish	Gas Users	
Quentin Jeay	Gas Users	
Dora Guzeleva	Energy Policy WA	Proxy for Noel Ryan
Frances Hobday	The Economic Regulation Authority (ERA)	
Katya Grimston	ERA	Presenter for item 5
Also in attendance	From	Comment
Sanna Pember	GAB Secretariat	
Rory Hannon	GAB Secretariat	Minutes taker
Erin Stone	Consultant for the GSI Rules Review	Presenter for item 6
Steve Hughes	Consultant for the GSI Rules Review	Presenter for item 6
Apologies	Class	Comment
Rachel Smith	Pipeline Operators and Owners	

Steve Parks	Gas Producers	
Noel Ryan	Observer (appointed by the Minister)	

1. WELCOME AND AGENDA

The Chair opened the meeting with an Acknowledgement of Country.

The Chair noted:

- that the main agenda item for today's meeting is the Review of the Gas Services Information (GSI) Rules, including the draft proposals and their rationale;
- her role as Commissioner at the Australian Energy Market Commission and that the views or advice provided by the Gas Advisory Board (GAB) to the Coordinator do not necessarily represent the views of the chair;
- her role as a part-time Councillor on the National Competition Council and that this position has been extended to February 2026; and
- the Competition and Consumer Law obligations, inviting members to bring to her attention any issues should they arise.

2. MEETING APOLOGIES/ATTENDANCE

The Chair noted the attendance and apologies as listed above.

3. ACTION ITEMS

The Chair noted that:

- item 112 is open and will be addressed by the Economic Regulation Authority (ERA) today under agenda item 5.
- items 118, 120(a) and 121 are now closed.
- AEMO is providing a verbal update on the open item 120(b) under agenda item 4.

4. GAS BULLETIN BOARD DATA VISIBILITY ISSUE

- Mr McKay noted that AEMO:
 - has been working closely with stakeholders to resolve issues around data, particularly regarding gas flows on the Dampier to Bunbury Natural Gas Pipeline (DBNGP) into the Karratha Gas Plant (KGP) for consumption; and
 - understands stakeholder concerns around data integrity and that it is also an area of concern to AEMO as it impacts their ability to generate accurate reports.
- He clarified the following:
 - AEMO's role as operating and maintaining the Gas Bulletin Board (GBB), includes supporting participant registration, supporting submissions of data and generation of reports; and
 - that the accuracy of data depends on gas market participants meeting their regulatory obligations. This includes notifying AEMO of changes to facilities, to participants and to shippers.
- Mr McKay explained that the delay in resolving data visibility issues and publication of data is due to confidentiality concerns and the requirement of the KGP to register as a Large User.
- He added that AEMO was first notified of issues with these gas flows in July of 2024 and began registration updates. This covered pipeline connection points and the KGP Large

User registration. However, progress was slowed due to confidentiality concerns raised by a participant.

- Mr McKay noted that:
 - AEMO conducted a thorough review and concluded that the concerns were not valid and that registration can proceed from a confidentiality perspective; and
 - AEMO's initial assessment had been that, since the KGP was receiving gas via the Burrup Extension Pipeline (BEP), a pipeline not registered under the GBB, the plant did not meet the criteria for registration as a Large User under the GSI Rules; and
 - Subsequent consideration, following additional information being provided by the pipeline operator, since clarified for AEMO that the BEP must be considered part of the covered DBNGP under the access arrangement governed by the National Gas Law. As such, the Karratha Gas Plant is required under the GSI Rules to register, with related data being made available via the GBB.
- He provided a current update as follows:
 - AEMO has formally requested KGP to register as a Large User; and
 - delivery point has been incorporated into the DBNGP, and all gas through that point is accounted for on the GBB; and
 - backdated flow data is being used to regenerate reports and update statistics dating back to October 2023 and anticipated to be completed in the next month.
- Mr Whish asked whether the backdated data would be represented in the Actual Flows and Energy as Consumption reports/csv files once the process was complete.
- Mr McKay explained that:
 - the backdated data is aggregated at the Dampier zone level and that the particular connection point for the KGP is not singled out; and
 - KGP registration will take place from a point in the future, so specific flows from the past cannot be called out; and
 - the Actual Flows and Energy as Consumption reports will be updated with backdated data from October 2023.
- Mr Whish noted he'd have to see the updated reports to get a better understanding of the matter.
- Mr McKay provided Mr Whish with the following information in the meeting chat: The reports that will be regenerated are [Actual Flows](#) and [End User Consumption](#). The MLV7 Delivery point is in the [Dampier Zone](#). AEMO will submit a [change notice](#) on the GBB identifying when these reports are changed.
- Mr Beverly asked, now that MLV7 is included as part of the DBNGP, whether flows going through to Karratha are included in the GBB but only at a zone level.
- Mr McKay noted that this was correct and added that GBB zones themselves provide an indication of what connection points are aggregated into different zones.
- Mr Beverly sought to clarify if this is why the Pilbara zone on the GBB report appear higher figures in recent weeks now that the KGP has been incorporated.
- Mr McKay confirmed that this was correct.
- Mr McDougall noted frustration with the length of time it had taken to resolve this issue.
- Mr McKay acknowledged his concerns and noted that that the confidentiality concerns and some complexity with interpretations of the GSI Rules had lengthened the timelines.

The Chair noted that timeliness was not the only concern raised by members, as limited communication from AEMO had also caused frustration. She suggested that members would appreciate greater transparency and more regular updates when issues are prolonged in this manner.

5. ERA COMPLIANCE MONITORING AND ENFORCEMENT UPDATE

- Ms Hobday presented on action item 112. The presentation slides were taken as read.
- Ms Hobday noted that:
 - today's presentation is to cover information and updates since the 20 March 2025 GAB meeting and that the last presentation provided the members with a detail compliance monitoring and enforcement update.
 - some of this information is also reported in the ERA's six monthly compliance reports - [Market Rules Compliance Reports - Economic Regulation Authority Western Australia](#).
- She added that the ERA had issued a notice to all Market Participants emphasising that that minor, low risk breaches persist, and the ERA will be pursuing behaviour change in relation to these as they can cause unnecessary difficulty for the AEMO.

The Chair noted that the information provided at the March meeting was intended to give members more detailed insight into the ERA's monitoring and enforcement processes, and to confirm that the ERA acts in a timely manner.

The Chair asked the ERA whether it would be possible to continue providing members with regular updates on the ERA's compliance monitoring and enforcement actions, with the next update to be provided in March 2026.

ACTION: The ERA is to prepare and deliver a compliance monitoring and enforcement update at the March 2026 meeting of the GAB (Date TBC).

6. REVIEW OF THE GAS SERVICES INFORMATION RULES

The Chair noted that the purpose of the discussion is to provide feedback on the proposed outcomes of the Review. The presentation slides were taken as read.

Ms Guzeleva provided background on the Review, highlighting that 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.

She acknowledged the working group members contribution to shaping the proposals, noting that no agreement/resolution was reached on certain issues.

Ms Stone presented slides 1-13.

Ms Stone presented slides 14-16 – Recommendation related to the Gas Statement of Opportunities (GSOO).

- Ms Tait confirmed that AEMO's GSOO modelling will be undertaken in-house from 2026.
- Mr Jeay agreed with the proposed approach of formalising improvement to the GSOO and noted that:
 - the 20-year forecasts align better with infrastructure life cycles;
 - more data is needed to make these forecasts accurate after the 10-year horizon, noting that this issue had been raised at AEMO's recent WA Gas Consultative Forum; and
 - he was supportive of including decarbonization pathways in the GSOO as this would support net-zero goals, clarify the role of gas in the energy transition, help understand interactions between gas and electricity markets, and promote better coordination between AEMO's gas and electricity planning functions.

- Ms Mason agreed with Mr Jeay on forecasts potentially becoming uncertain after 5-10 years as extrapolation of current trends can be inaccurate.

The Chair noted that AEMO is experienced in including appropriate caveats around the quality and reliability of any data that is published.

Mr Hughes presented slides 17-19 – Including information on domestic gas market obligations in the GSOO.

The Chair summarised the two main questions as follows:

- whether the information currently gathered by the Department of Energy and Economic Diversification (DEED) as part of the WA Domestic Gas Statement (WADGS) should become a formal GSI Rules requirement and published in the GSOO and on the GBB? and
- given what is already reported, is there further information that members view as beneficial?
- Mr Whish noted that, as a gas field approaches the end of its life, annual reporting wouldn't capture producers' performance against the gas reservation policy or their individual Domestic Gas Obligations (DMOs) with enough granularity and therefore wouldn't provide participants or the public with enough time to raise concerns if it appears obligations won't be met.

The Chair noted Mr Whish's points that more frequent reporting assists in identifying issues earlier.

- Mr Alexander argued in favour of more frequent reporting, noting that this:
 - would address the information vacuum that currently exists by providing users with transparent information; and
 - gives producers an opportunity to be transparent about their performance, building trust with the public; and
 - provide information about the gas they are bringing to market and their contribution to the WA economy.
- Mr McDougall expressed a desire for Liquid Natural Gas (LNG) exports to be included for comparisons purposes.
- Mr Whish noted that gas users shouldn't have to manually track or calculate these numbers.
- Ms Tait noted that AEMO's preference is to publish this data on the GBB primarily because of the timing misalignment between the publication of WA Domestic Gas Statement and the GSOO.
- Mr Jeay noted that it would be valuable to include this information both in the GSOO and on the GBB. He added that regular and transparent reporting is important and helps to enforce the validity of the DMO framework.
- Mr Beverly supported the comments made so far and noted he was in favour of frequent reporting of this information, his preference being quarterly on the GBB. He added that he was also supportive of the additional information outlined on slide 19 to provide more transparency to the market.
- Mr Jeay noted that this proposal should include an obligation for any information on factors that might prevent a producer from meeting its DMO or enable a producer to meet its DMO, noting that it was important that the market have confidence in a producer's ability to meet its obligations.
- Mr Rafferty noted that:

- the intent of the Domestic Gas reservation policy and individual DMOs is to reserve a quantity of gas for domestic sale, have the infrastructure to deliver it effectively and to market this gas in good faith;
- quarterly or monthly reporting could make producers look out of balance with their DMOs when in fact a producer's LNG export lifts might take place early in the year and they can make up their DMO throughout the remainder of the year;
- more regular reporting could be misleading and of limited value; and
- if participants were advocating for this change as a form of compliance monitoring, formal systems are already in place between producers and DEED.

The Chair asked members if there is other anchoring information that could be included to put the information in context and ensure that it is useful to participants.

- Ms Stankovic agreed with Mr Rafferty's point that regular reporting could be confusing, and that a reporting and compliance mechanism already exists. She noted that this information is one part of the larger context for LNG exports and domestic gas sales in WA, and when presented without the rest of that context may not be meaningful.
- Mr Whish asked if more regular reporting of this information, but measuring and presenting it cumulatively, could represent a better approach. He noted that there was no incremental reporting burden, as the data should already be available to producers through their invoices.

The Chair summarised that the principal question was not if the data was available but how it could be presented in a way that is contextual and useful.

- Mr Rafferty agreed, noting that:
 - producers are currently providing comprehensive information on their LNG exports and domestic gas sales as well as forward forecasting of expected sales to DEED; and
 - he would be comfortable with a cumulative approach.
- He concluded that, if this approach was being taken because there is a need for enforcement and the market is not seeing appropriate enforcement, that's a separate question that needs addressing through other means, including the formal mechanisms that exist between producers and DEED.

The Chair asked whether it is necessary to include this information in the GSOO or on the GBB, and the need for additional information to be reviewed to test if it is meaningful and useful to the market.

The Chair noted that the GAB has not been able to reach an agreement on the approach.

Ms Stone noted that most working group members were unaware of the WADGS and that the 2024 and 2025 data was not yet published. She added that many had remarked that creating a mandated requirement and a single source of truth for this information is the best approach to informing the market of producer's performance against their DMOs.

Ms Guzeleva noted that it was clear from the discussions that there is no consistent view across stakeholders. She concluded that the best approach is to include the issue in the Consultation Paper and invite stakeholder submissions.

The Chair acknowledged Ms Guzeleva's approach and suggested outlining the pros and cons of the proposal in the Consultation Paper, reflecting on the discussions by the GSI Rules Review Working Group (GSIRRWG) and the GAB.

Ms Stone presented slides 21-23 – Clarifying definitions to improve consistency and accuracy of information on the GBB.

- Ms Mason noted, with regard to the proposed definition of Capacity Outlook, that:

- APA interprets the *expected* to be what third-party customers expect to transport through the pipeline facility on a gas day or period of gas days;
- consequently, the way APA would approach this is providing the aggregated forecasts and nominations for that facility in this report and not what the maximum operational capacity is for that facility; and
- the customer nominations data is already provided in the nominations and forecasts report sent to AEMO.
- Ms Mason proposed keeping the definition of Capacity Outlook the same so that it represents operational capacity on a day then use the nominations and forecasts report provided to AEMO to calculate a rate of utilisation for facilities. She added that this is the approach used on the east coast GBB.
- She added that her impression from the GSIRRWG discussion is that members wanted to understand what facilities can do on a day but also the utilisation of that facility.
- With regard to the LCA Flag for storage facilities, she noted that:
 - the APA supports the proposal to remove LCA flags from storage facilities; and
 - as can be seen on the GBB today, APA has planned maintenance on Mondarra and as such have had to provide an LCA flag as red to comply with the GSI Rules, though this may not provide meaningful context.

The Chair invited the GAB members to provide feedback. As there were no comments, the Chair concluded that feedback on these proposals may be organisation specific and so suitable to be consulted on as part of the public consultation process.

Mr Hughes presented slides 24-26 – Opportunities to improve the GBB and invited a representative from AEMO to provide any additional comments.

- Ms Tait noted that AEMO, in principle, is open to changes to the GBB that will assist with providing transparency to industry.
- Mr McKay noted that stakeholders have access to publicly available data on pre-dispatch schedules for Gas Powered Generation (GPG) gas consumption in the WEM.
- He added that the challenge in integrating GPG forecasts is twofold:
 - the uncertainty of dispatch forecasts; and
 - converting a MW forecast into a TJ gas flow forecast as different facilities would have different rates of conversions from a TJ to a MW output.
- Mr Whish asked whether the MW to TJ conversion varies greatly from one facility to another and from full to lower levels of MW output.

Ms Guzeleva responded that the gas facilities' efficiencies are different and therefore their fuel consumptions are different. She added that conversion is possible if you know with any certainty the technical and physical characteristics of a gas plant but that this also varies, at any point, based on where a facility's generation is in the range between its minimum and maximum.

The Chair asked if AEMO is already doing the conversion of facilities TJ consumption to MW output on the East Coast.

- Mr McKay responded that he is not across this in any detail.

The Chair invited members to comment on whether this information would be beneficial to understand what the gas demand of GPG is and how fine the gas demand/supply balance is.

Ms Stone noted that feedback from the GAB was also sought on a broader 'wish list' for the GBB.

- Mr McKay noted that AEMO is supportive, in principle, of including GPG forecasts on the GBB. However, due to the challenges associated with various approaches it would be

helpful if members provided their input on possible solutions while AEMO contacts its east coast counterparts for advice.

- He added that the final product may have to represent a compromise, such as a MW forecast for GPG, if energy conversions prove too challenging.
- Mr Beverly noted that live gas flows from gas production plants would be useful for buyers making decisions and asked if this is possible.
- Mr McKay responded that AEMO currently doesn't have that information and that the GBB is not set up for live data. He added that if submissions can be sent to AEMO then AEMO can generate reports on those submissions to be as real time as possible.

The Chair noted that this information could be useful and asked whether it would be feasible for AEMO to incorporate it.

- Mr Jeay agreed that live flows data would be useful and added that perhaps hourly updates would be feasible. Using a current example, Mr Jeay stated that there was a line pack status shown as red right now on the DBNGP but no further data. This leaves participants unable to adjust their operations as needed.
- He added that data on the current amount of gas in storage and available storage capacity would also be useful to the market.
- Mr Rafferty noted that he wasn't necessarily opposed to Mr Beverly's proposal for live flow data but that it would require a significant amount of work for this to be viable. He added that storage capacity information may not be useful as participants typically need an active contract with a facility to be able to withdraw. He urged members to strongly consider the cost vs benefit of any proposed changes.
- Mr Rafferty noted that, if a facility is offline or there's a large gas shortage and the emergency management framework is enabled to manage the situation, that would override other arrangements and participants wouldn't be able to contact storage facilities to access capacity.

The Chair noted Mr Rafferty's point that the costs of collecting and reporting information should be considered against its usefulness.

- Mr McKay provided extra information to Mr Jeay in the meeting chat as follows:
 - The Red LCA in relation to Mondarra is in this report: [Gas Bulletin Board \(WA\)](#).
- Mr Whish noted that, in terms of storage levels, the data should already be present if you work from the storage figures reported by facilities to AEMO. He added that taking this balance and then summing the ins and outs shouldn't present any extra cost.
- Ms Mason responded that:
 - providing daily or regular data to the GBB does cause additional costs on facility operators' verses providing it once per year in the GSOO;
 - there are always needs to configure systems to calculate and report the data, and daily monitoring by staff to ensure the data is accurate and successfully received by AEMO; and
 - benefits and costs need to be considered in any changes to this data.

Ms Guzeleva, in responding to points made about live or close to real time data feeds, noted that the Capacity Outlook, provided daily at 9am and updated as required, was intended to provide information on the flows from a facility.

Ms Stone presented slide 32 – Allowing for 'other' gases under the GSI Rules.

- Mr Rafferty echoed his view from the GSIRRWG meetings that it's too early to begin integrating these 'other gases' into the WA market.
- Ms Mason and Mr Beverly agreed.

The Chair asked GAB members what the best trigger would be for a review.

- Mr Rafferty responded that 5-10% of the existing gas market, as this could represent a 'significant' share, acknowledging that this was a quantity he had chosen for illustrative purposes.

The Chair noted that the draft Consultation Paper will be circulated to GAB members out of session.

- Mr Rafferty suggested that GAB members provide input on pros and cons of the LNG exports vs DomGas sales proposal for the GBB prior to the Consultation Paper being circulated to GAB members out of session.

Ms Guzeleva stated that EPWA will consider this and come back to members, and that pros and cons would be outlined in the Consultation Paper regardless.

7. OTHER BUSINESS

The Chair noted the amending rules made by the Minister in relation to the allowable revenue framework (agenda item 7).

She noted that proposed upcoming GAB meeting dates for 2026 will be circulated to the GAB for approval out of session.

The Chair noted that Mr Parks has resigned from the GAB, effective from 31 October 2025.

The meeting was closed at **3:00pm**.