GOVERNMENT OF WESTERN AUSTRALIA

Department of Energy and Economic Diversification

Energy Policy WA

Review of the Gas Services Information (GSI) Rules

Consultation paper

15 December 2025

Working together for a brighter energy future.

An appropriate citation for this paper is: Review of the Gas Services Information (GSI) Rules – Consultation Paper

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Abbreviations

Term	Definition
AEMO	Australian Energy Market Operator
BB	Bulletin Board
DEED	Department of Energy and Economic Diversification
DMO	Domestic market obligation
EISC	Economics and Industry Standing Committee
EPWA	Energy Policy WA
ERA	Economic Regulation Authority
ESM Rules	Electricity System and Market Rules
GAB	Gas Advisory Board
GBB	Gas Bulletin Board
GPG	Gas powered generation
GSI	Gas Services Information
GSIRRWG	Gas Services Information Rules Review Working Group, also referred to in this paper as 'the working group'
GSOO	Gas Statement of Opportunities
LCA	Linepack capacity adequacy
LNG	Liquified natural gas
MTCO	Medium Term Capacity Outlook
NGL	National Gas Law
NGR	National Gas Rules
SWIS	South West Interconnected System
WA	Western Australia
WADGS	Western Australian Domestic Gas Statement
WEM	Wholesale Electricity Market

Executive summary

Background and context

The Gas Services Information (GSI) Rules are part of a regulatory framework designed to promote transparency of forecast and historical data for the domestic production, transmission, storage and use of natural gas in Western Australia (WA). The GSI Rules prescribe the functions of various parties under the framework and govern the operation of the Gas Bulletin Board (GBB) and preparation of the WA Gas Statement of Opportunities (GSOO).

The Coordinator of Energy, in consultation with the Gas Advisory Board (GAB), is conducting a review of the GSI Rules (the Review). The Review is being undertaken in consultation with stakeholders, including the GSI Rules Review Working Group (working group) established by the GAB.

The purpose of the review is to identify and implement changes to evolve and enhance the GSI Rules. There are two key drivers for the review:

1. The Inquiry into the WA Domestic Gas Policy (the Inquiry), including:
    - the four Inquiry recommendations[1] relating to the provision of data and broadening the scope of the GSOO, which were supported by the WA Government; and
    - other amendments or clarifications to the GSI Rules aimed at achieving the intent of the Inquiry's recommendations; and
2. National Gas Law (NGL) reforms and changes to the National Gas Rules (NGR) as they may apply in WA, in particular those around information standards and transparency.

The review also considers any other aspects of the GSI Rules that may require clarification or amendment in order to improve the quality and transparency of information in the WA gas sector.

Issues for consultation

This consultation paper sets out the 14 proposed outcomes of the review, which include:

- formalising improvements to the GSOO by extending the forecast period and including decarbonisation pathways;
- amending the definitions of Nameplate Capacity, Capacity Outlook, and Medium Term Capacity Outlook to address inconsistencies in how information is reported;
- improving the data reported on the GBB to ensure it is accurate, useful and usable;
- improving consistency with information provisions in the NGL and NGR by adopting principles for the enhancement of transparency and reporting provisions;
- considerations for a trigger event to review the GSI framework with a view to accommodate gases other than natural gas;
- increasing transparency of the Economic Regulation Authority's (ERA) investigations under the GSI Rules by introducing a public register for investigations; and
- increasing awareness of domestic gas reporting obligations by, providing a link to the WA Domestic Gas Statement (WADGS) into the GBB, once it has been published by the Department of Energy and Economic Diversification (DEED).

[1] Specifically, recommendations 15, 16, 17 and 23 from the *Inquiry into the WA Domestic Gas Policy: Final Report*.

Each of the proposed outcomes are summarised in Table 1:1.

Stakeholder consultation – call for submissions

Stakeholders are invited to provide feedback on the GSI Rules Review proposed outcomes outlined in this paper.

Submissions can be emailed to: energymarkets@deed.wa.gov.au

Any submissions not marked as confidential will be published on www.energy.wa.gov.au. The consultation period closes at **5:00 PM AWST on 9 February 2026**. Late submissions may not be considered.

Summary of proposed outcomes

Table 1:1 Proposed outcomes and rationale

Proposal	Rationale
Formalising improvements to the GSOO Two of the Inquiry recommendations within the scope for this review relate to improvements to the GSOO. AEMO has already begun implementing these improvements. It is proposed to formalise them in the GSI Rules.	
Proposal 1: Extend the GSOO forecast period Amend the GSI Rules to extend the minimum forecast period for the GSOO from "at least 10 years" to 20 years.	Recommendation 16 from the Inquiry proposed the GSOO be expanded to cover a 20-year forecast period. Amending the GSI Rules in response to this recommendation is within the scope of this review. Lengthening the forecast period to 20 years will assist market participants in making decisions about investment and will increase transparency of the forecast supply/demand balance. The proposed amendment aligns with the Inquiry's findings and formalises changes AEMO has already begun implementing. Specifying this information provision in the GSI Rules formalises the requirement.
Proposal 2: Include decarbonisation pathways in the GSOO Amend the requirements for the GSOO to also include decarbonisation pathways.	Recommendation 17 from the Inquiry proposed that the GSOO includes forecasts of the decarbonisation pathways for gas users in WA. Amending the GSI Rules in response to this recommendation is within the scope of this review. The decarbonisation of the State's energy system, including interactions between gas and electricity, is a critical input to gas and electricity forecasting. Including more information about the relationship between gas and electricity supply and demand in the GSOO will benefit the market by increasing participants' understanding of usage patterns and changing behaviours, helping to inform their decarbonisation efforts. AEMO has already started including information on decarbonisation pathways in the GSOO. Specifying this information provision in the GSI Rules formalises the requirement.

Proposal	Rationale
Improving definitions There is a varying degree of understanding across the industry regarding the definitions of Nameplate Capacity, Capacity Outlook, and Medium Term Capacity Outlook. This has led to inconsistencies in how information is reported. Changes are proposed to clarify the definitions of these terms in the GSI Rules.	
Proposal 3: Amend the definition of Nameplate Capacity Amend the definition of Nameplate Capacity to clarify the intent that it should reflect maximum operating limits including, where relevant, any significant and permanent modifications from the original design capacity.	The definition of Nameplate Capacity in the GSI Rules has led to inconsistencies in how it is reported via the GBB. Some participants are not providing an accurate reflection of the current maximum technical operating limits of their facility, providing the original design capacity instead. However, as facilities age or are modified over time, this original Nameplate Capacity may no longer reflect their current operating limits and does not represent the facility's actual capability. Amending the definition will provide clearer guidance on how Nameplate Capacity 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.
Proposal 4: Amend the definition of Capacity Outlook Amend the definition of Capacity Outlook to clarify the intent for it to be a short term estimate of gas quantities expected to be injected, accounting for all relevant factors.	The GBB should provide a reasonable forecast of what capacity is expected to be utilised rather than what it could potentially be. The current Capacity Outlook definition may lead a participant to only report how much gas is *theoretically* available (e.g. Nameplate Capacity minus any Facility Outages) rather than what it expects *will* be utilised and what is therefore expected to be available. Refining the definition of Capacity Outlook will make it clearer that it should reflect what is likely to be utilised over a seven-day period, based on the relevant participant's understanding of capacity utilisation and any other factors that will impact the operation of the facility. This will drive efficient market outcomes as participants will have better visibility of the capacity expected to be utilised and what may be available.
Proposal 5: Improve Capacity Outlook reporting Add a free text field to Capacity Outlook reporting on the GBB.	Not all outages and/or maintenance issues impact the entirety of a pipeline. The ability to provide more detail via a free text field in the Capacity Outlook report on the GBB will help the market understand how much gas is available, when, and where, in the event of an issue that impacts the Capacity Outlook.
Proposal 6: Amend the definition of Medium Term Capacity Outlook Amend the definition of the Medium Term Capacity Outlook (MTCO) so that it reflects what the facility is actually capable of producing, without accounting for the volumes that may flow through the facility on any given day, and incorporating any changes to its Nameplate Capacity, including outages.	The MTCO definition in the GSI Rules has led to inconsistent GBB reporting, as some facility operators report expected output while others do not. The MTCO should reflect the actual capacity available at a facility that will not be utilised, accounting for any changes to the Nameplate Capacity, including outages. The proposed definition aims to correct this inconsistency in reporting and provide a clearer, more consistent picture of available capacity.

Proposal	Rationale
Amendments to data reported on the GBB A number of proposed changes and additions to the GBB are being considered to improve the transparency of gas market information. Each of these will be subject to further assessment by AEMO regarding cost impact, required effort and practicality to assist in developing an informed position and ensure the benefits will outweigh the costs.	
Proposal 7: Remove Linepack capacity adequacy (LCA) Flags for Storage Facilities Remove the obligation for Storage Facilities to provide LCA Flags, consistent with the treatment of a Production Facility.	Market participants have provided feedback that the current LCA definition as it applies to Storage Facilities is vague, can be difficult to apply and may be of limited use. Production Facilities are not required to produce LCA Flags on the GBB as any capacity issues are already signalled via the Capacity Outlook forecasts, MTCO and outage notification processes. Applying the same approach to Storage Facilities as to Production Facilities by removing the LCA Flag will be simpler for Facility Operators and more accurately reflect their physical capabilities.
Proposal 8: Clarify GBB Zone reporting by including net consumption Include net consumption of WA zones on the GBB in addition to Total Receipt and Total Delivery volumes.	Current reporting of receipt and delivery volumes has been identified as double-counting gas that is simply transported through a zone. Updating the GBB to include net consumption per GBB Zone will provide greater clarity and granularity of gas use and availability per region, and will avoid double-counting. This would allow participants to better understand market dynamics, leading to more efficient market outcomes.
Proposal 9: Include gas related WEM data Require AEMO to publish gas powered generation (GPG) Wholesale Electricity Market (WEM) information on the GBB including - but not limited to - demand, supply, linepack and peak consumption.	There is an opportunity to publish useful and usable data related to gas generation in the WEM on the GBB. Better integrating electricity and gas information is also consistent with Recommendation 23 from the Inquiry.[2] Including information related to GPG in the WEM would allow participants to better understand market dynamics and the impact of electricity generation on gas supply and demand.
Improving consistency with information provisions in the National Gas Law and Rules There is an opportunity to align information accuracy and reporting standards in the GSI Rules with those in the NGL and NGR to improve information being reported on the GBB and inputs into the GSOO.	
Proposal 10: Introducing principles for Information Standards Introduce principles from the NGL and NGR information standards into the GSI Rules	The NGR includes information standards that set expectations on the accuracy of gas market data. Introducing similar principles into the GSI Rules could help promote data transparency and consistency. Introducing a reasonableness test for the accuracy of information could help to support more effective compliance with information provision requirements.

2 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.

Proposal	Rationale
to ensure adequate accuracy of information.	There is currently no proposed wording for these information standard principles. Stakeholder feedback is sought on the approach to introduce a principles-based information standard into the GSI Rules.
Proposal 11: Introduce a duty of confidence clause Introduce a clause clarifying that a duty of confidence is not a reason for non-compliance with the GSI Rules.	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. 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.
Accommodating gases other than natural gas As changes to WA legislation are being progressed to include gases other than natural gas consistent with the NGL and NGR, it is important that the WA gas market prepares for the integration of other covered gases. Consideration must be given as to how those other gases should be incorporated into the GBB and GSOO to ensure reporting accuracy and transparency of information.	
Proposal 12: 'Other gases' review trigger event Determine a trigger event to initiate a review of changes required to accommodate 'other gases' on the GBB and in the GSOO.	Changes to WA legislation are being progressed to include gases other than natural gas consistent with the NGL and NGR. These changes were introduced to the national framework to reduce ambiguity on the types of gases covered by the regulatory framework and to prepare the gas sector for transition away from traditional fossil gases in the long term. While it is important that the WA gas market prepares for the integration of other covered gases, such changes to the GSI Rules (and consequently to the GSOO and GBB) are time and resource intensive and may offer limited benefit at this time. The Review therefore considered the merits of determining a trigger for reviewing the GSI Rules and making the necessary changes to integrate 'other gases' into the GSI framework. A potential trigger could be, when a commercial volume of 'other gas' is expected to enter the system. This would then help justify the effort and costs of making the necessary GSI changes. There are no proposals, at present, on the trigger or the timing of integrating 'other gases' into the GSI framework at this time. Stakeholder feedback is sought on this matter.
Transparency of ERA investigations There is an opportunity to improve transparency in reporting of compliance activities under the GSI Rules.	
Proposal 13: Public register of investigations Adopt and adapt the concept of the public register of investigations from the Electricity System and Market (ESM) Rules in the GSI Rules.	The ERA is not currently required to provide information about its investigations under the GSI Rules. This limits the amount of publicly available information on compliance issues and therefore participants' ongoing ability to learn from these investigations and mitigate future compliance issues. Adopting a public register, mirrored on the register in the ESM Rules, would allow the ERA to share more information on 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.

Proposal	Rationale
Increasing awareness of domestic gas reporting obligations There is an opportunity to increase awareness of domestic gas reporting obligations, supporting a better understanding of the WA gas market.	
Proposal 14: Increase awareness of domestic gas reporting obligations. A link to the WA Domestic Gas Statement should be included on the GBB once it has been published by DEED.	The working group raised the issue of having visibility of gas producers' progress towards meeting domestic market obligations (DMOs). Information on performance against DMOs is reported as part of the WA Domestic Gas Statement (WADGS). The WADGS provides detailed information on: • each operating domestic gas project; • LNG exporters' compliance with individual domestic gas reservation requirements; and • expected gas supply to the WA market in the short to medium-term. DEED also collects LNG export data which is provided on a confidential basis by producers in their annual domestic gas reports. The WADGS is a relatively new publication developed with information provided on a voluntary basis. Most of the GAB and working group members were not aware of its existence. An effective way of increasing awareness of the WADGS and its content is to include a link to the WADGS on the GBB once it's published by DEED. At this stage, the proposed review outcome focuses on the potential integration of the WADGS onto the GBB, rather than the reporting or publication of additional information. This approach reflects: - The current divergence of industry views; - Ongoing improvements that DEED is making to the WADGS; and - The planned 2026 review of the Statement by DEED, which will be conducted in consultation with stakeholders.

1. Introduction

1.1 The review of the Gas Services Information (GSI) Rules

Western Australia's energy sector is undergoing a transition to a low emissions energy system, with the demand profile and electricity supply sources changing rapidly. Over the coming decades, more intermittent and distributed generation will enter the market, energy storage technology will improve in capability, and ageing thermal generators will retire.

Gas, along with renewables, storage and transmission infrastructure, is expected to play a critical role in ensuring reliability in the South West Interconnected System (SWIS). To ensure continuity of gas supply, a regulatory framework that promotes market transparency and reliable forecasting is essential.

Transparency of gas market information was a key focus of the recent Inquiry into the WA Domestic Gas Policy by the Economics and Industry Standing Committee (EISC). Among its key findings, the Inquiry highlighted the need for improvements to the Gas Services Information (GSI) regime and recommended the State Government and the Australian Energy Market Operator (AEMO) collaborate to review the GSI framework.

Rule 8(1C)(aA) of the GSI Rules confers the function on the Coordinator of Energy (the Coordinator) to consider and, in consultation with the Gas Advisory Board (GAB), progress the evolution and development of the GSI Rules.

In accordance with this, the Coordinator in consultation with the GAB and AEMO, is undertaking a review of the GSI Rules. The purpose of the review is to:

- assess the GSI Rules in the context of the Inquiry's recommendations, which were supported by the Western Australian (WA) Government, and propose any necessary amendments or clarifications to the GSI Rules;
- ensure consistency with provisions in the National Gas Law (NGL) and National Gas Rules (NGR) in light of reforms to the National Gas Law framework (i.e. to Parts 10 and 18A of the NGR proposed to be adopted in WA[3]); and
- evaluate additional aspects of the GSI Rules that may require clarification or amendment.

1.2 Background

1.2.1 The domestic gas sector in Western Australia

The domestic gas sector in WA is distinct from other jurisdictions, largely due to its lack of interconnection to other jurisdictions in Australia, substantial supply from offshore gas fields and unique market composition and structure. The WA domestic gas market primarily services a large base of industrial and mining consumers, with residential, commercial, and small industrial consumers accounting for only a small portion of the market.

Most of the gas used in WA is sold through confidential, long-term bilateral contracts between a limited number of large gas producers, industrial consumers, and gas retailers. While most gas transactions occur through these long-term agreements, there are platforms for short-term gas trading where participants trade relatively small quantities of gas.

3 DEED will consult separately on Western Australia's instruments to adopt the reforms to the National Gas Law already implemented in the rest of Australia by the *Statutes Amendment (National Energy Laws) (Gas Pipelines) 2022* (SA) and *Statutes Amendment (National Energy Laws) (Other Gases) Act 2023* (SA).

1.2.2 The GSI Framework

The *Gas Services Information Act 2012* (GSI Act) and the *Gas Services Information Regulations 2012* establish the head of power for the GSI Rules and provide a regulatory framework designed to promote transparency regarding forecast and historical data on the domestic production, transmission, storage and usage of natural gas in WA.

The GSI Rules detail the roles and functions of the Coordinator, AEMO, the Economic Regulation Authority (ERA) and rule participants; and govern the operation of the Gas Bulletin Board (GBB) and preparation of the Gas Statement of Opportunities (GSOO).

The GSI Objectives are specified in section 6 of the GSI Act and rule 2(1) of the GSI Rules as:

> *The objectives of the GBB and the GSOO (the GSI Objectives) are to promote the long term interests of consumers of natural gas in relation to:*
>
> *(a) the security, reliability and availability of the supply of natural gas in the State;*
>
> *(b) the efficient operation and use of natural gas services in the State;*
>
> *(c) the efficient investment in natural gas services in the State; and*
>
> *(d) the facilitation of competition in the use of natural gas services in the State.*

Under rule 2(2) of the GSI Rules, the GBB and the GSOO are intended to provide visibility of the current and forecast status of natural gas supply, transmission, storage and demand in WA.

1.2.3 Inquiry into the WA Domestic Gas Policy

In June 2023, the EISC commenced an Inquiry into the WA Domestic Gas Policy (Policy)[4]. The Inquiry was initiated in response to a tightening of the WA gas market and concerns that some liquified natural gas producers will not meet their domestic gas commitments under the Policy by the time the gas projects reach end of field life.

The Inquiry focused on how well the Policy's existing mechanisms ensure the timely delivery of gas into the domestic market and the transparency of both the supply and price of gas. It also considered what role the State Government should play in ensuring WA has adequate domestic gas supplies into the future.

In August 2024, the final report of the Inquiry into the Western Australian Domestic Gas Policy was published[5]. The report highlighted 77 findings and 30 recommendations across:

- policy implementation and compliance;
- gas market reforms;
- transparency and forecasting;
- future gas requirements; and
- opportunities to maximise supply into the future.

In September 2024, the State Government published its response to the EISC's Inquiry Final Report[6], as well as its updated WA Domestic Gas Policy[7]. The Government supported several

[4] See: https://www.wa.gov.au/government/wa-domestic-gas-policy

[5] Economics and Industry Standing Committee, Report 8 - DOMESTIC GAS SECURITY IN A CHANGING WORLD Inquiry into the WA Domestic Gas Policy: Final Report

[6] Government Inquiry Response - September 2024

[7] Domestic gas policy updated to secure WA's energy future

recommendations related to the GSI framework, including recommendations 15, 16, 17 and 23, which are incorporated in this review and summarised in the following section.

1.2.4 Recommendations specific to the GSI framework

The EISC made several recommendations related to the GSI framework that were supported by the State Government:

- Recommendation 15: That the State Government collaborate with the AEMO to review the GSI framework 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 GSOO be expanded to cover a 20-year forecast period.
- Recommendation 17: That the 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 GPG.

The Inquiry also found that there is very little public information about the prices being paid for domestic gas at any time. This is because most gas traded in WA is via confidential, bilateral agreements and this confidentiality extends to the price paid for the gas.

This consultation paper does not consider transparency with regard to prices set in individual commercial contracts[8], which remains out of scope for this review.

1.2.5 AEMO actions in response to the Inquiry

Since the publication of the Inquiry report and the Government's response, AEMO has, in the 2024 GSOO, actioned recommendations to:

- include forecasts of the decarbonisation pathways for gas users; and
- increase the integration of gas and electricity planning within the GSOO.

In the 2024 GSOO AEMO also:

- adjusted inputs to the forecasts to reflect the Policy as at 2024, that only the minimum volume (15%) of gas produced by offshore LNG projects is reserved for the domestic gas market, and that only the maximum permissible volume is exported from new onshore gas projects;
- indicated its intention to expand the GSOO to cover a 20-year period in future; and
- noted that it will continue to engage with relevant government agencies, as required, to share relevant information.

In line with the Inquiry recommendations, planned improvements to the 2025 GSOO includes extending the outlook to 20 years and including information on the impact of decarbonisation pathways on gas demand.

[8] Recommendation 20, that wholesale price transparency measures be included in the transparency reforms to be considered as part of the review of the GSI framework, was only noted by the WA Government. The GSI framework does not deal with prices set in contracts between commercial parties.

1.2.6 Reforms to the National Gas Law

The NGL and NGR provide the overarching legislative and regulatory framework for Australia's gas pipelines and markets.

WA adopted modified versions of the NGL and NGR under the *National Gas Access (WA) Act 2009* (WA Gas Act). As a result, the NGL and NGR that apply in WA are different to those that apply in every other participating jurisdiction. Amendments that are made to the NGL are not automatically adopted in WA.

Recent changes to the national NGL and NGR, including information transparency requirements and the provision for gases other than natural gas are yet to be adopted in WA. Energy Policy WA and the Parliamentary Counsel's Office are currently drafting legislative instruments to adopt parts of the *Statutes Amendment (National Energy Laws) (Gas Pipelines) Act 2022* (Gas Pipelines Package) and the *Statutes Amendment (National Energy Laws) (Other Gases) Act 2023* (Other Gases Package) in WA and public consultation is anticipated to commence in early 2026.

In the light of the NGL/NGR amendments, this review considers whether the GSI Rules can be enhanced to improve transparency, improve consistency with the NGL and NGR, and better inform decision making.

2. How this review is being conducted

2.1 Staged approach

This review is being conducted in four stages, described in the following table.

Figure 2:1 Stages of the GSI Rules review

Stage	Description
Stage 1: Assess existing framework	Building on the work undertaken by the EISC and previous work by AEMO, an assessment of the provisions of information for the GBB and the GSOO was undertaken. This included: • improving consistency with proposed changes to the WA NGL and NGR; • formalising GSOO improvements; • opportunities to improve the GBB; • improving definitions to Nameplate Capacity, Capacity Outlook, and Medium Term Capacity Outlook; • domestic gas reporting; • gas related WEM data; and • transparency of ERA investigations.
Stage 2: Issues analysis and proposal development	The next step in the process included developing and assessing suitable proposals for amending and/or clarifying the relevant parts of the GSI Rules identified in the previous stage. The focus of this stage was to analyse issues and recommend potential improvements to the GSI Rules to improve the quality and transparency of gas market information. Considerations for the GAB and its GSI Rules Review Working Group (GSIRRWG) included how the GSI Rules can 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 included: 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
Stage 3: Developing design proposal	Proposed review outcomes were developed during Stage 3, reflecting stakeholder views and concerns. The proposed review outcomes, developed from discussions with the GAB, the GSIRRWG and Energy Policy WA (EPWA), are compiled in this consultation paper and published for public feedback.
Stage 4: Developing amending rules	Stage 4 will deliver the draft rules, including any transitional amendments. This will include an Information Paper outlining the final review outcomes and a public consultation of the draft GSI Amending Rules.

2.2 Stakeholder engagement

The review of the GSI Rules is being undertaken in consultation with stakeholders. The GAB has established the GSI Rules Review Working Group (working group), comprising of representatives from the gas industry to provide feedback on policy consideration and proposed review outcomes. The feedback helped shaped the proposals in this paper.

The scope of work, the terms of reference, papers and detailed minutes from the working group and the GAB meetings relevant to this review are available on the EPWA website.

This paper provides all stakeholders an opportunity to respond to the policy proposals. Stakeholders will also have opportunity to comment on the draft GSI Rules amendments to implement the proposals in 2026.

2.3 Structure of this paper

This consultation paper summarises the finding, analysis and proposed outcomes from the first stages of the review.

This paper sets out:

- the findings and issues identified in Stages 1-2 of the review;
- a suite of 14 proposed outcomes to improve the quality and transparency of the GSI Rules arising from stage 3 of the review; and
- consultation questions on each matter.

3. Formalising improvements to the GSOO

The WA GSOO is an annual report that presents forecasts of WA domestic gas demand and potential supply over a 10-year period, including an overview of gas infrastructure and emerging issues affecting the WA gas industry. It provides gas market participants and other stakeholders with information about the WA gas industry, including assessments relating to medium and long-term natural gas supply, demand, transmission and storage capacity.

The Inquiry included the following recommendations relating to the GSOO:

- **Recommendation 16:** That the GSOO be expanded to cover a 20-year forecast period.
- **Recommendation 17:** That the GSOO includes forecasts of the decarbonisation pathways for gas users, despite the difficulties associated with this.

AEMO has already commenced several actions to address the Inquiry's recommendations. Notwithstanding this progress, it is important to formalise the GSOO changes in the GSI Rules. Proposed review outcomes one and two address these matters.

3.1 Extending the GSOO forecast period

The recommendation to extend the forecasting horizon in the GSOO to 20 years is driven by concerns about long-term energy security planning in WA. The Inquiry highlighted that WA faces increasing gas demand and declining supply, with potential shortfalls forecast from 2030 onwards. The current GSOO forecast period of 10 years is insufficient to capture these long-term deficits.

The Inquiry recommended that domestic gas reservation levels for new LNG projects should be based on evidence of future shortfalls, which requires longer-term demand and supply forecasts. Extending the forecasting horizon will provide will assist market participants in making decisions about investment and will increase transparency of the forecast supply/demand balance.

Further, gas projects and associated infrastructure (pipelines, processing facilities) have long development timelines, often exceeding a decade. A 20-year outlook provides investors and policy makers the visibility needed to make decisions today on projects that will come online during the 2030s and beyond. This is particularly important given the scheduled exit of coal-fired electricity generation from the SWIS and the consequent reliance on gas-fired generation.

Formalising the extension of the GSOO forecasting horizon to 20 years in the GSI Rules will improve market transparency and enable gas producers, gas users, and government agencies to anticipate supply gaps and price trends. This will also help reduce uncertainty and support efficient market outcomes.

This proposal was supported by the GAB and its working group. Members highlighted that, while extending the forecast to 20 years is a useful exercise for AEMO to undertake, the quality and reliability of data available to AEMO from Gas Producers, Gas Users and Facility/Pipeline Operators for the outer years of the forecast will decline. As such, the 20-year forecast should not be solely relied upon for making investment decisions, and participants will need to conduct their own due diligence and forecast projections prior to making any long-term commitments.

Proposal 1

Amend the GSI Rules to extend the minimum forecast period for the GSOO from "at least 10 years" to 20 years.

Consultation question

1 Do stakeholders agree that amending the GSI Rules to formalise the requirement for AEMO to produce 20-year gas supply and demand forecasts in the GSOO would be beneficial?

3.2 Decarbonisation pathways

The Inquiry recommended that the GSOO incorporates forecasts of decarbonisation pathways for gas users to ensure long-term planning reflects Western Australia's commitment to net zero emissions by 2050. Decarbonisation pathways refer to modelled scenarios showing how major gas-consuming sectors – such as power generation, mining, and other heavy industry – may progressively reduce emissions through measures like electrification and adoption of renewable gases.

The decarbonisation of the State's energy system, including interactions between gas and electricity, is a critical input to gas and electricity forecasting. Including these forecasts and more information about the relationship between gas and electricity supply and demand in the GSOO will benefit the market by increasing participants' understanding of usage patterns and changing behaviours, helping to inform their decarbonisation efforts. This is essential as producers, generators, industry and other stakeholders plan for the future.

The most practical way of aligning the forecasts in the Electricity Statement of Opportunities (ESOO) and the GSOO comes from maintaining a consistent set of modelling scenarios and input assumptions across both documents.

The GAB and its working group supported formalising these additional requirements in the GSI Rules.

Proposal 2

Amend the requirements for the GSOO to also include decarbonisation pathways.

Consultation question:

2 Do stakeholders agree that formalising a requirement for AEMO to include information on decarbonisation pathways in the GSOO would be beneficial?

4. Opportunities to improve the GBB

The GBB is a public website that provides forecast and historical data on the domestic production, transmission, storage and usage of natural gas. It includes additional capability to share information to assist in managing gas emergencies through the Emergency Management Facility (EMF). The information provided by the GBB and EMF is also used in the management of supply disruptions.

In light of the Inquiry's general direction to improve the transparency of domestic gas market data, this review considered what additions could be made to the GBB (and GSOO) to uplift the quality of data available to participants.

Any enhancements to the GBB will be subject to further assessment by AEMO regarding cost impact, required effort and practicality to assist in developing an informed position and ensure the benefits will outweigh the costs.

4.1 Improving definitions

There is a varying degree of understanding across the industry regarding the definitions of Nameplate Capacity, Capacity Outlook, and Medium Term Capacity Outlook (MTCO). This has led to inconsistencies in how information is reported.

It is therefore proposed to amend the definitions of these terms in the GSI Rules to improve clarity and the accuracy of data provided by participants. These proposed amendments are discussed in the following subsections.

4.1.1 Definition of Nameplate Capacity

The definition of Nameplate Capacity in the GSI Rules has led to inconsistencies in how it is reported via the GBB. Some participants are not providing an accurate reflection of the current maximum technical operating limits of their facility, providing the original design capacity instead. However, as facilities age or are modified over time, this original Nameplate Capacity may no longer reflect their current operating limits or the facility's actual capability.

The current definition of Nameplate Capacity in the GSI Rules is as follows:

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;

(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;

(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;

(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); and

(e) for a Storage Facility:

(i) Production Nameplate Capacity;

(ii) Refill Nameplate Capacity; and

(iii) Storage Nameplate Capacity.

The current definition includes no provision for changes in a facility's Nameplate Capacity resulting from modifications to the facility. For example, a facility's original Nameplate Capacity might have been 100 TJ/Day, but modifications since then may have increased (or reduced) the actual capacity of the facility. This means that the reported Nameplate Capacity no longer accurately reflects the amount of gas a facility can produce and is therefore of limited value.

Amending the definition will provide clearer guidance on how Nameplate Capacity should be reported, ensuring that it reflects any significant and permanent modifications 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.

The following definitions are proposed (amendments in red):

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 and permanent 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 and permanent 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 and permanent 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 and permanent 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.

The working group discussed the merits of further clarity in relation to the definition of Nameplate Capacity and was supportive that this enhancement would better ensure that producers have clearer instruction regarding the reporting of their facilities Nameplate Capacity. The working group identified that this would help mitigate the current risk of having a rolling fixed number that may not be reflective of actual capability.

This proposal was supported by the GAB and its working group.

Proposal 3:

Amend the definition of Nameplate Capacity to clarify the intent that it should reflect maximum operating limits including, where relevant, any significant and permanent modifications from the original design capacity.

Consultation questions:

3a Do stakeholders agree that amending the definition of Nameplate Capacity would allow parties to better understand the capabilities of individual facilities?

3b Do stakeholders consider that the amended definition above is appropriate? If not, what amendments could be made to better achieve the intent?

4.1.2 Definition of Capacity Outlook

Similar to the concerns with the definition of Nameplate Capacity, there exists a potential to misinterpret the definition of Capacity Outlook. The Capacity Outlook in the GBB should provide a reasonable seven-day estimate of expected quantities of gas to be produced, injected, transported and withdrawn daily.

The current definition of Capacity Outlook in the GSI Rules (emphasis added) is:

Capacity Outlook means, for a Gas Day:

(a) for a GBB Pipeline, the Registered Pipeline Operator's estimate of the quantities of natural gas that ***can*** be:

(i) transported through the pipeline; and

(ii) delivered at each Gate Station,

on the Gas Day, based on knowledge of the Facility's capability and availability over that time (see rule 57);

(b) for a GBB Storage Facility, the Registered Storage Facility Operator's estimate of the quantities of natural gas that ***can*** be:

(i) withdrawn from the storage facility for injection into GBB Pipelines; and

(ii) received by the storage facility and injected into storage,

on the Gas Day, based on knowledge of the Facility's capability and availability over that time (see rule 65); and

(c) for a GBB Production Facility, the Registered Production Facility Operator's estimate of the quantity of natural gas that ***can*** be injected from the Facility into GBB Pipelines on the Gas Day, based on knowledge of the Facility's capability and availability over that time (see rule 72).

The use of the word ***can*** in the current definition does not make explicit the requirement for the Capacity Outlook to reflect the quantity of gas that ***will*** or ***is likely to be*** made available. It could be interpreted that the Capacity Outlook is simply an extrapolation of Nameplate Capacity (because Nameplate Capacity reflects the amount of gas a facility *can* theoretically make available).

Some producers have used Nameplate Capacity as the basis for the Capacity Outlook, rather than assessing what the facility is expected to produce over that period. This is not in line with the original intent of the GSI Rules as it does not provide participants with useful information about the capability and availability of a facility.

The market could be aided by amending the definition of Capacity Outlook to make it clearer that the GBB forecast should reflect what is likely to be utilised by the facility over a seven-day period, based on the relevant participant's understanding of its capacity utilisation and any other factors that will impact the operation of the facility.

The following amended definition is proposed (amendments in red):

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~~ 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~~ are expected to be:

(i) withdrawn from the storage facility for injection into GBB Pipelines; and

(ii) received by the storage facility and injected into storage,

on the Gas Day, ~~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~~ quantities of natural gas that ~~can~~ 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).

The GAB and its working group supported the proposal to add clarity to the information requirement by amending the Capacity Outlook definition. A member was concerned that the proposed wording would not achieve the intended result, noting that on the East Coast:

- under the GBB rules, the Short Term Capacity Outlook (which is akin to Capacity Outlook under the GSI) reports on maximum operational capacity rather than utilisation; and
- AEMO provides a facility's expected utilisation on the GBB by taking the Facility operator's Nominated and Forecast Flows report and applying it to its Short Term Capacity Outlook.

The member noted that this gives market participants a view to what the expected utilisation of a facility is on a day and whether there is unutilised operational capacity available.

There was a suggestion from the member for EPWA to work with AEMO to determine if the necessary information, including expected utilisation, could be sourced from other information provided to AEMO such as the Nominated and Forecast Flows, or calculated based on other information provided by participants such as Nameplate Capacity and outage quantities.

Proposal 4:

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.

Consultation questions:

4a Do stakeholders agree that amending the definition of Capacity Outlook would allow participants to better understand the expected utilisation of individual facilities?

4b Do stakeholders consider that the amended definition above is appropriate? If not, what amendments could be made to better achieve the intent?

4.1.3 Improve Capacity Outlook reporting

The Capacity Outlook report on the GBB is relatively constrained, only presenting a simple capacity volume per day. Working group members highlighted that not all outages and/or maintenance issues impact the entirety of a facility and, therefore, presentation of a simple capacity number may not provide the full picture of what capacity is available and where.

Figure 4:1 Snapshot of GBB Capacity Outlook Report

Capacity Outlook

Seven-day Capacity Outlook from Gas Day 01/11/2025, as at 31/10/2025 13:55:12 (GSI Rule 85(a))

Go To | Previous | Next | Current | Print | Download

Facility	Gate Station	Type	01/11	02/11	03/11	04/11	05/11	06/11	07/11
Beharra Springs		Production Capacity	23.0	23.0	23.0	23.0	23.0	23.0	23.0
Dampier to Bunbury Natural Gas Pipeline	Barter Road	Gate Station Capacity	13.7	13.7	13.7	13.7	13.7	13.7	13.7
Dampier to Bunbury Natural Gas Pipeline	Clifton Road	Gate Station Capacity	16.1	16.1	16.1	16.1	16.1	16.1	16.1
Dampier to Bunbury Natural Gas Pipeline	Ellenbrook	Gate Station Capacity	1.2	1.2	1.2	1.2	1.2	1.2	1.2
Dampier to Bunbury Natural Gas Pipeline	Eneabba	Gate Station Capacity	6.7	6.7	6.7	6.7	6.7	6.7	6.7
Dampier to Bunbury Natural Gas Pipeline	Harvey	Gate Station Capacity	3.7	3.7	3.7	3.7	3.7	3.7	3.7

Including a free text field in the GBB Capacity Outlook report would allow participants to provide additional detail on outages and other capacity impacts. This in turn would allow gas users to understand which parts of a pipeline are affected, how much gas is available, when and where.

AEMO is considering the cost impact and required effort and practicalities of this proposal. EPWA will work with AEMO to understand the costs associated with the proposed introduction of a free text field in the Capacity Outlook before any final position is determined.

The GAB and its working group supported this proposal, in principle, but noted that this change and other proposed changes to the GBB must be subject to a cost assessment by AEMO and more detailed consideration of how best to add this functionality to the GBB.

Proposal 5:

Add a free text field to Capacity Outlook reporting on the GBB.

Consultation question:

5 Do stakeholders agree that inclusion of a free text field will allow the market to better understand Capacity Outlook reporting and how outages impact the ability of facilities to supply gas?

4.1.4 Definition of Medium Term Capacity Outlook

The MTCO should reflect the actual capacity available at a facility that will not be utilised, accounting for any changes to the Nameplate Capacity, including outages. However, some facility operators report their expected output while others do not, resulting in inconsistent reporting. The

proposed definition aims to correct this inconsistency in reporting and provide a clearer, more consistent representation of available capacity.

Further, the MTCO is not required to be updated during the seven-day period already covered by the Capacity Outlook, which may result in inconsistent forecasts. Amending the current MTCO definition so that it begins immediately after the seven-day Capacity Outlook period would help prevent misaligned or inconsistent forecasts across the 12-month outlook that follows.

The following amendments to the MTCO definition are proposed (in red):

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.

The working group and the GAB supported the proposal.

Proposal 6:

Amend the definition of the MTCO so that it reflects what the facility is actually capable of producing, without accounting for the volumes that may flow through the facility on any given day, and incorporating any changes to its Nameplate Capacity, including outages.

Consultation questions:

6a Do stakeholders agree that amending the definition of the MTCO would avoid potential misalignment of information and allow participants to better understand the expected output of individual facilities?

6b Do stakeholders consider that the amended definition above is appropriate? If not, what amendments could be made to better achieve the intent?

4.2 Amendments to data reported on the GBB

4.2.1 Linepack capacity adequacy flag for Storage Facilities

A linepack capacity adequacy (LCA) Flag is an indicator published on the GBB by Pipeline Operators to indicate whether their pipeline system has sufficient linepack (stored gas within the pipeline) and compression capacity to meet forecast demand for upcoming gas days. A similar LCA Flag requirement applies to Storage Facilities, requiring operators to indicate the number of days for which supply of gas can be maintained at maximum operational capacity.

Unlike pipeline assets, which span hundreds of kilometres and can have varying capacity constraints along their length, storage facilities are less dynamic. While it is appropriate for Pipeline Operators to flag how capacity might vary between compressor stations, Storage Facilities are subject to no such variation as their capacity is provided from a single location at a point in time.

In this respect, Storage Facilities are more akin to Production Facilities, which are not required to provide LCA Flags. Any capacity issues for Production Facilities are captured in the daily Capacity Outlook.

Given Storage Facilities already produce a daily Capacity Outlook, there is limited benefit in them also being required to raise LCA Flags. Removing the section of the LCA Flag definition that applies to Storage Facilities will simplify the GSI Rules and eliminate confusion over the application and interpretation of LCA flags for storage facilities.

The following amendments are proposed (in red):

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.~~

The working group discussed the relevance of LCA Flags for Storage Facilities and agreed that their inclusion in the GBB offers limited value, particularly in the event of an emergency. The group recommended removing the LCA Flag requirement for Storage Facilities, which would simplify the GSI Rules and reduce confusion around their interpretation. The group also agreed proposed changes to Capacity Outlook reporting obligations should be consistent between production and storage facilities to better reflect storage's physical capabilities (section 4.1.2).

The GAB and its working group supported the proposal.

Proposal 7:

Remove the obligation for Storage Facilities to provide LCA Flags, consistent with the treatment of a Production Facility.

Consultation questions:

7a Do stakeholders agree that amending the definition of an LCA Flag to remove the obligations for Storage Facilities is appropriate?

7b Do stakeholders consider that the amended definition above is appropriate? If not, what amendments could be made to better achieve the intent?

4.2.2 Enhance WA Zone reporting by including net consumption

Gas zones on the GBB are geographic groupings of gas facilities – such as production plants, pipelines, and major demand centres – used to organise and report market data under the GSI Rules. The WA GBB currently shows total receipt and total delivery per zone but does not present net consumption per zone whereas the East Coast GBB shows net consumption per state (see Figure 4:2 and Figure 4:3)

Figure 4:2 Snapshot of the WA GBB

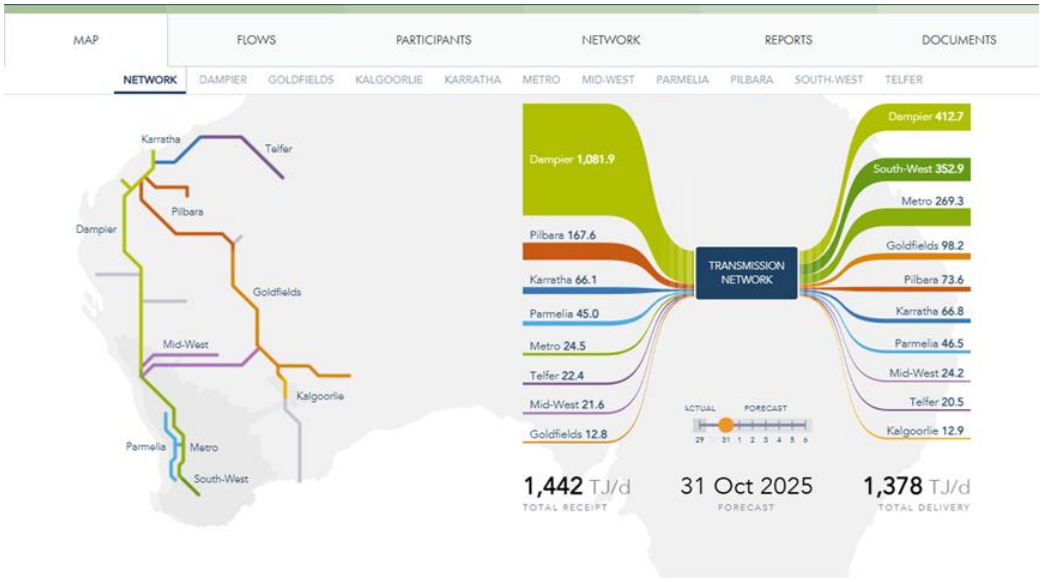
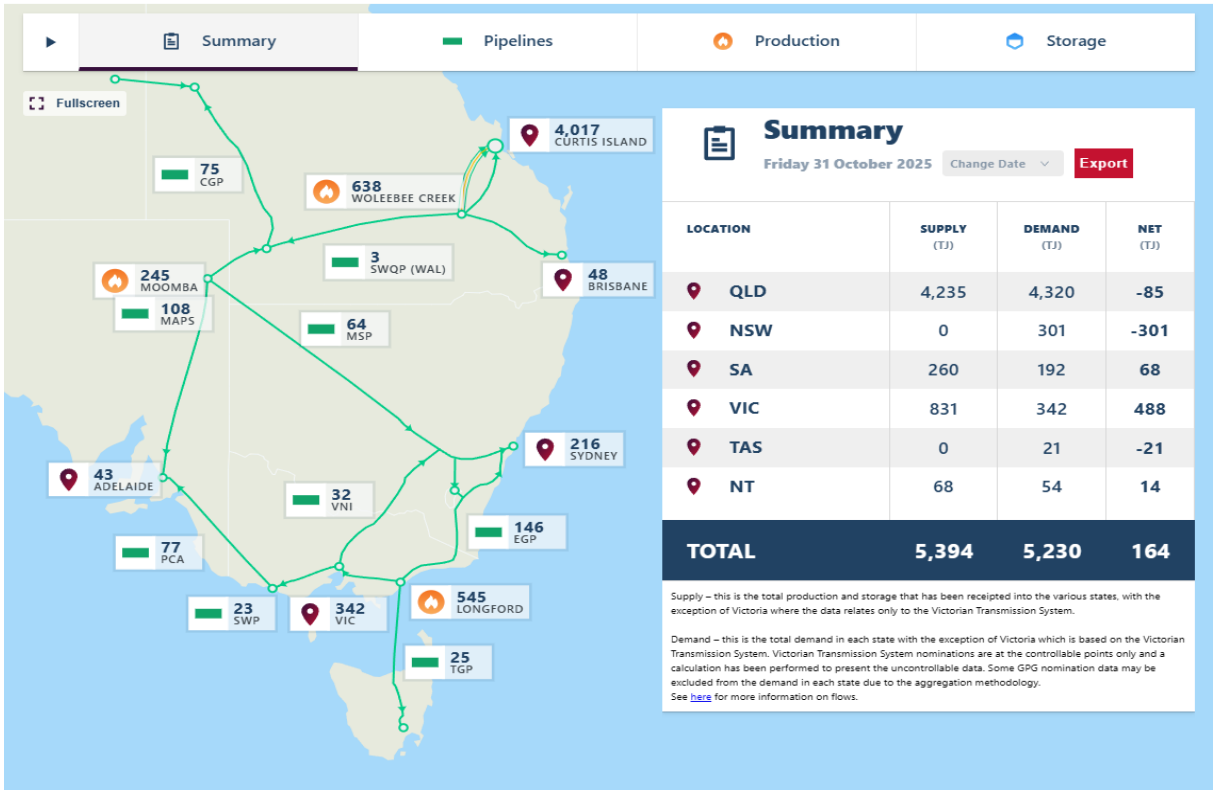


Figure 4:3 Snapshot of the East Coast GBB



The current reporting of receipt and delivery volumes on the WA GBB is double-counting gas that is simply transported through a zone. Updating it to include net consumption per GBB Zone will provide greater clarity and consistency of gas use and availability per region while avoiding double-counting. This change would allow participants to better understand market dynamics and other participants'/facilities' behaviour, leading to more efficient market outcomes.

The GAB and its working group supported this proposal, in principle, but noted that this change and other proposed changes must be subject to a cost assessment by AEMO and more detailed consideration of how best to add this functionality to the GBB.

Proposal 8:

Include net consumption of WA zones on the GBB in addition to Total Receipt and Total Delivery.

Consultation question:

8 Do stakeholders agree that including net zone consumption on the GBB would eliminate the issue of double counted gas and provide better transparency to participants?

4.2.3 Include gas related WEM data

The Inquiry included the following recommendation regarding to the GSOO and GBB:

- **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 GPG.

In light of this recommendation, the review considered whether it would be beneficial to include more demand-side information on the GBB, such as forecast and actual gas powered generation (GPG) consumption, and peak consumption in the WEM. Displaying gas-related electricity data on the GBB would allow participants to better understand electricity and gas market dynamics and the interactions between the two markets.

Stakeholder suggestions for additions to the GBB included:

- gas related electricity demand;
- gas related electricity supply;
- linepack; and
- electricity and gas peak consumption.

The GAB and its working group supported the proposal to greater align electricity and gas data but recommended AEMO investigates the cost and deliverability of these changes to the GBB to assist in developing the final review outcomes and ensure the benefits will outweigh the costs.

Proposal 9:

Require AEMO to publish gas power generation (GPG) Wholesale Electricity Market (WEM) information on the GBB including - but not limited to - demand, supply, linepack and peak consumption.

Consultation questions:

9a Do stakeholders agree that providing information related to GPG on the GBB would be meaningful and useful to gas market participants?

9b If so, what information would be needed to adequately provide greater transparency to the market?

4.2.4 Other potential enhancements to the GBB

The working group considered additional enhancements to the information provided on the GBB with a view to further enhance transparency, particularly around asset utilisation and opportunities to identify spare capacity. The working group discussed various options, including aligning the WA GBB with some of the information on production, pipelines and storage provided on the East Coast GBB (see Figure 4:4)

Figure 4:4 Snapshot of East Coast GBB reports

Production

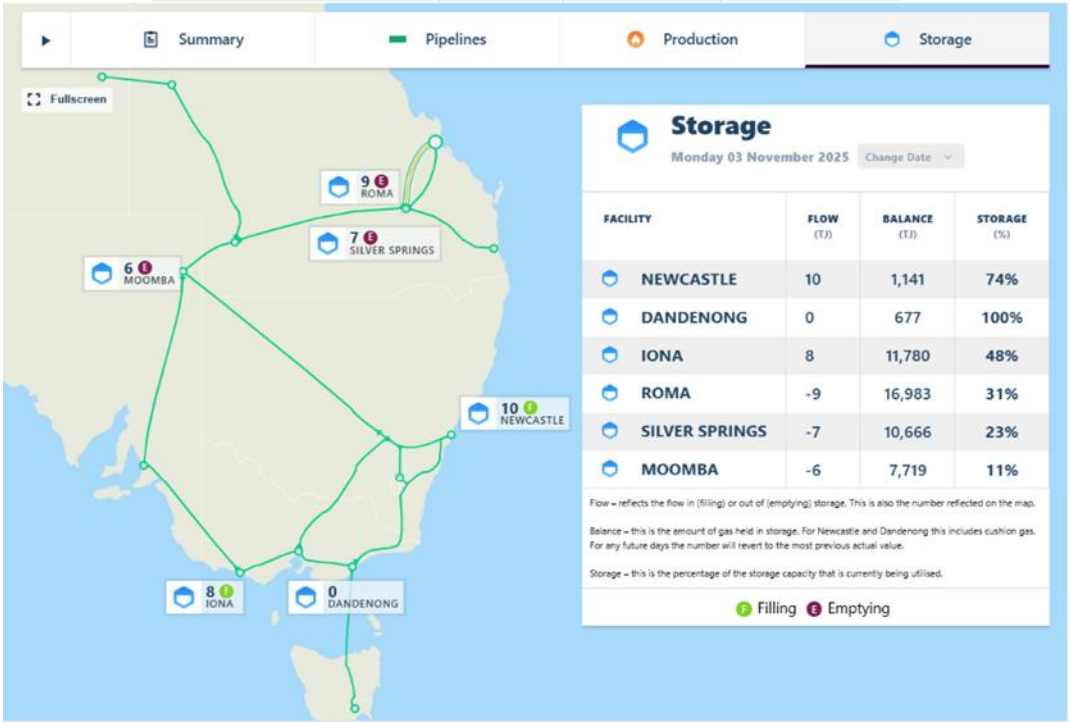
Monday 03 November 2025 Change Date

FACILITY	FLOW (TJ)	CAPACITY (TJ)	UTILISATION (%)
LANG LANG	16	16	100%
LONGFORD	505	715	71%
OTWAY	169	185	91%
MOOMBA	245	245	100%
BELLEVUE	174	174	100%

Pipelines

Monday 03 November 2025 Change Date

FACILITY	FLOW (TJ)	CAPACITY (TJ)	UTILISATION (%)
APLNG	1,633	1,700	96%
CGP	79	119	67%
EGP	150	327	46%
GLNG	1,143	1,430	80%
MAPS	88	249	35%



The GAB and its working group did not reach a consensus on what, if any, additional information should be included on the GBB and, therefore, no proposed outcome is being put forward at this time. Instead, stakeholder feedback is sought on what information would be of value to include.

Consultation question:

9c What other additional information should be included on the GBB and how would this information be of value to gas market participants?

5. Improving consistency with information provisions in the National Gas Rules

The NGR includes information standards that set expectations on the accuracy and provision of gas market data. Introduction of the principles from the information standards could provide useful guidance and bolster the standard of information provision that currently exist in the GSI Rules. The Review, therefore, considered the merits of adopting some of these information principles (or similar) in the GSI Rules.

5.1 Introducing principles for information standards

Parts 10 and 18A of the NGR have introduced provisions on data accuracy and confidentiality. As these are proposed to be adopted in WA, the working group considered whether these (or similar) provisions could be adopted in the GSI Rules, aligning the two sets of instruments.

The GSI Rules provide guidance on the following information provision matters:

- what information needs to be provided;
- how that information should be provided;
- who that information should be provided to; and
- when the information needs to be provided.

However, the GSI Rules do not provide explicit guidance on:

- the level of data accuracy required;
- what reflects a reasonable data estimate; or
- obligations around confidential information.

The NGR and WA NGR contain clauses that outline expectations and standards relating to the provision of information.

Figure 5:1 shows the Access information standard in Rule 36A of the WA NGR.

Figure 5:1 WA NGR 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.

Figure 5:2 shows the NGR bulletin board (BB) Information Standards of the NGR.

Figure 5:2 NGR BB Information Standard

(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.

Pending public consultation as part of the introduction of the Gas Pipelines Package in WA, it is expected that the content of Rule 101 of the NGR (Access standard information) [9], will be reflected in the WA NGR, replacing the current wording of Rule 36A.

It is considered reasonable to expect a certain level of rigour around the accuracy of all information provided for the purpose of the GBB and the WA GSOO.

The working group considered the introduction of information accuracy principles would improve the quality of information provided under the GSI Rules. However, no consensus was reached on whether the access information standard or NGR Bulletin Board (BB) information standard should be used as the basis for these principles.

The working group discussed the differences between the access information standard and the BB information standard. Some members noted that principles brought across from the information standards in the NGL should set the standard(s) used for reporting on the GBB so that linking from the GBB will meet the NGR requirements.

[9] NGR Part 10: Prescribed transparency information - AEMC Energy Rules.

The proposed outcome is to introduce GSI information principles. This proposal was supported in principle by the GAB and its working group.

One member requested that the need for the proposed changes, given their size and scale, be more clearly articulated. The member questioned whether this level of detail is necessary for transparency and noted that it may create an unnecessary burden on participants, which should be avoided.

Stakeholder feedback is sought on two potential options to guide the wording of the information standard principles. One option is to adopt principles from the access information standard (shown in Figure 5:1, noting the expected substitution of Rule 36A of the WA NGR for Rule 101 as part of introduction of the Gas Pipelines Package in WA), while the other option under consideration is to use principles from the BB (bulletin board) Information Standard from the NGR (shown in Figure 5:2), which appears less onerous.

The introduction of explicit information accuracy requirements is not expected to place any unreasonable burden on participants.

Proposal 10:

Introduce principles from the NGL and NGR information standards into the GSI Rules to ensure adequate accuracy of information.

Consultation questions:

10a Do stakeholders consider that it is appropriate to introduce a principles-based information standard into the GSI Rules, modelled after those included on the NGL/NGR?

10b If not, what alternative approach would better suit the GSI framework?

10c If yes, which of the two proposed information standards do stakeholders consider to be the most appropriate set of requirements to model these principles after?

5.2 No reliance on duty of confidence to avoid obligation to provide information

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 (see Figure 5:3)

Figure 5:3 GSI Act duty of confidence clause

10. No reliance on duty of confidence to avoid obligation to provide information

A person cannot rely on any duty of confidence as a ground on which to refuse to comply with an obligation to provide information under this Act.

Rule 198B of the NGR contains a similar clause as follows:

Figure 5:4 NGR duty of confidence clause

198B Person cannot rely on duty of confidence to avoid compliance with Part

(1) A person must not refuse to comply with this Part on the ground of any duty of confidence.

(2) A person incurs, by complying with this Part, no liability for breach of contract, breach of confidence, or any other civil wrong.

After the Gas Pipelines Package commences in WA, it is proposed that this rule will also be adopted in the WA NGR.

Introducing a corresponding requirement in the GSI Rules will align the GSI with the NGR, reinforce reporting obligations obligation, provide greater clarity to participants, and support consistent compliance with information provision requirements.

The working group supported this proposal. The GAB did not explicitly consider this proposal, but no concerns were raised.

Proposal 11:

Introduce a clause clarifying that a duty of confidence is not a reason for non-compliance with the GSI Rules.

Consultation questions:

11a Do stakeholders consider that the introduction of such a clause to be appropriate to ensure that information is not being withheld from the market on confidence grounds?

11b Do stakeholders agree that this will help to provide better transparency and support consistent compliance with GSI reporting obligations?

6. 'Other Gases' Package – implications for the GSI Framework

6.1 'Other gases' review trigger event

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

- natural gas;
- hydrogen;
- biomethane;
- synthetic methane; and
- blends of these gases.

These changes are expected to be adopted in WA during 2026. This review, therefore, considered whether similar changes should be made to the GSI Rules to explicitly integrate gases other than natural gases.

The need for changes in the GSI Rules over the longer term was agreed by stakeholders, but there were concerns that the introduction of any material quantities of 'other gases' is not likely to occur

within the next decade, given the recent stalling of hydrogen projects. The potential effort and cost of making these changes must also be acknowledged. This Review therefore considered the merits of determining a trigger for reviewing the GSI Rules and making the necessary changes to integrate 'other gases' into the GSI framework.

The GAB and its working group supported a proposal to determine a trigger. A potential trigger discussed was when a commercial volume of 'other gas' is expected to enter the system. This would then help justify the effort and costs of making the necessary GSI changes.

There are no proposals, at present, on the trigger or the timing of integrating 'other gases' into the GSI framework and stakeholder feedback is sought on this matter.

Proposal 12:

Determine a trigger event to initiate a review of changes required to accommodate 'other gases' on the GBB and in the GSOO.

Consultation questions:

12a Do stakeholders agree that introducing provisions for 'other gases' into the GSI framework would at present be of limited benefit?

12b If so, what do stakeholders consider to be an appropriate trigger to begin integrating 'other gases' into the GSI framework?

7. Transparency of ERA investigations

The ERA is responsible for compliance monitoring and conducting investigations into breaches and compliance issues regarding the GSI Rules. However, the ERA is not obligated to publish information about these investigations. This lack of visibility limits participants' ability to learn from these investigations, understand what constitutes a compliance breach, and how such potential breaches can be avoided.

The ERA has agreed that participants would benefit from greater transparency but has expressed concern that without an explicit provision to publish specific information, it would be prevented from sharing investigation details due to confidentiality issues.

7.1 Public register on investigations

Adopting a public register process, similar to that in the Electricity System and Market Rules (ESM) Rules, would empower the ERA to share more information on its compliance monitoring and investigations. It is proposed to introduce an obligation on the ERA to share non-confidential information on its investigations, particularly where that information will help resolve issues with rules interpretation or increase transparency in the WA gas market.

The following information could be shared by the ERA (subject to confidentiality restrictions):

- breaches of rules when the benefit of 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 a breach in the public register;
- claims for confidentiality; and
- public register publishing requirements.

The working group supported this proposal. The GAB did not explicitly consider this proposal, but no concerns were raised.

Proposal 13:

Adopt and adapt the concept of the public register of investigations from the ESM Rules in the GSI Rules.

Consultation questions:

13a Do stakeholders agree that introducing a public register of investigations in the GSI Rules, modelled on that in the ESM Rules, will help improve information transparency in the WA gas market?

13b Do stakeholders consider that such a register will help to modify participant behaviour?

8. Increasing awareness of domestic gas reporting obligations

WA's Domestic Gas Reservation Policy (the Policy) imposes obligations on gas producers to ensure a secure and affordable supply of gas for the WA market. The following sets out how the Policy applies to different projects and how compliance is enforced.

- Offshore LNG projects:
  - Offshore LNG producers must reserve equivalent to 15% of LNG production for the WA market. This obligation applies to all LNG export projects where the gas is brought onshore for processing and is enforced through various contractual agreements with the State, including State Agreements, State Development Agreements and Domestic Gas Commitment Agreements.
  - Develop and/or obtain access to the necessary infrastructure to meet their domestic gas obligations
  - Making gas available to existing and prospective customers by demonstrating diligence and good faith in marketing.
- Onshore LNG projects:
  - Under current rules (until 31 December 2030), new onshore gas projects must reserve 80% of their production for WA domestic use.
  - From 2031 onwards, 100% of onshore gas production must be supplied to the WA domestic market.
  - Onshore producers are allowed limited exports until 2030 to encourage project development, but this is capped at 20% of production.
- Compliance and reporting
  - Producers report annually and confidentially to DEED on compliance against their domestic gas obligations.
  - Compliance against DMOs are reported publicly through the annual WADGS.

The recent Inquiry highlighted that there is insufficient transparency in whether producers are complying with their DMOs.[10] The Inquiry found that although producers provide annual reports to government, these are not publicly disclosed, limiting market visibility. In response to Recommendation 1 of the Inquiry[11], the State Government worked with industry to develop the WA Domestic Gas Statement (WADGS).

The WADGS provides detailed information on:

- each domestic gas project operating in WA;
- LNG exporters' compliance with individual domestic gas reservation requirements; and
- expected gas supply for the WA market in the short to medium term.

[10] This issue was acknowledged Australia-wide, with the *National Gas (South Australia) (Market Transparency) Amendment Act 2022* amending the NGL to introduce new requirements for LNG exporters to report for the first time to better inform the level of domestic gas supply. The information that LNG export facilities must provide is detailed in Part 18 of the NGR. These reforms do not apply to in Western Australia.

[11] Recommendation 1: That the State Government consider mandating that a relevant agency report on historical compliance by domestic market obligation holders against their commitments under the WA Domestic Gas Policy.

The statement aims to help stakeholders to understand supply availability and LNG exporters' strategies for meeting their domestic gas obligations over the life of their projects/commitments.

Information is provided to DEED voluntarily on an annual basis. The WADGS was first published in September 2024 and more recently updated in November 2025.

During the working group meetings, some stakeholders requested greater visibility of gas producers' progress towards meeting domestic gas obligations. Despite being active participants in the WA domestic gas market, many of the stakeholders at the time of the discussion were not aware of the WADGS's publication. There would therefore be benefit in raising the profile of the WADGS and the information contained within it.

While several working group members considered there is value in having more transparent data on LNG exports and domestic gas supply, some members raised concerns about the frequency of reporting and practicality of including data on the GBB. Given compliance with DMOs is already reported annually to DEED, some working group members suggested that any increase in reporting frequency could be misleading because:

- different gas producers having different obligations;
- the timing of shipments for smaller producers skews reporting over the course of the year; and
- the strategic timing of meeting DMOs may not be achieved in direct alignment to the life of the gas field.

They also noted that mechanisms already exist for the WA Government to enforce the policy for any producer who fails to meet its requirements, and that increasing reporting frequency would not necessarily address concerns that producers may not be meeting their obligations.

The table below summarises the advantages and disadvantages identified during the discussions with the GAB and its working group on reporting DMOs and LNG exports, and whether this information should be integrated into the GSOO and/or on the GBB.

Table 8:1 Summary of advantages and disadvantages of LNG exports and DMOs reporting identified by the GAB and its working group

Advantages	Disadvantages
• Timely and accurate information supports transparency, decision-making and compliance monitoring, and helps assess non-delivery risks and factors affecting field life and gas availability. • More frequent data may indicate variability in shipping and delivery patterns, providing additional insight into operating conditions. • More regular updates may help market participants identify emerging issues and adjust storage or contracting decisions, as needed, which may also reduce the likelihood that reserved volumes remain unsold or unutilised. • Incremental technical barriers to implementation appear limited, as the required information can be extracted from producers' systems.	• Different operational and market factors may affect short-term performance, and frequent reporting could misrepresent producers' performance, as DMOs are assessed over the life of a field. • Data interpretation may create the perception that some producers are not meeting their obligations, even when they are compliant. • Frequent reporting may not necessarily enhance outcomes as formal mechanisms for addressing non-compliance exist elsewhere. • Expanded obligations can impose additional responsibilities, causing costs for producers to validate, process, and report data, as well as for AEMO to integrate it into the GBB/GSOO.

The relevant part of DEED advised the working group that the WADGS will be improved to include expected supply disaggregated by participant and an expanded supply horizon (from three to five

years).[12] This was included in the November 2025 update to the Statement. DEED also indicated that the WA Government has committed to review the Statement in 2026, with the option to legislate the provision of this information, if required.

There was no consensus by the GAB or its working group on whether information about the export of LNG, sales of domestic gas and performance against DMOs should be published under the GSI Rules either on the GBB or in the GSOO in addition to the WADGS, or how frequently it should be updated.

At this stage, the proposed review outcome focuses on the potential integration of the WADGS onto the GBB, rather than the reporting or publication of additional information. This approach reflects:

- The current divergence of industry views;
- Ongoing improvements that DEED is making to the WADGS; and
- The planned 2026 review of the Statement by DEED, which will be conducted in consultation with stakeholders.

Increasing awareness of the WADGS will help market participants better understand the link between producers' performance against DMOs and the supply and demand of gas in WA. An effective way of increasing awareness of the WADGS and its content is to include a link to the WADGS on the GBB once it's published by DEED.

Proposal 14:

A link to the WA Domestic Gas Statement should be included on the GBB once it has been published by DEED.

Consultation questions:

14 Do stakeholders agree that a link to the WADGS should be included on the GBB, once it is released by DEED, to increase awareness of the Statement and domestic gas reporting obligations?

[12] Subsequent to this discussion, this has now been included in the November 2025 update to the WADGS.

List of consultation questions

For convenience, a full list of the consultation question is provided below.

Consultation questions	
Formalising improvements to the Gas Statement of Opportunities (GSOO)	
1	Do stakeholders agree that amending the GSI Rules to formalise the requirement for AEMO to produce 20-year gas supply and demand forecasts in the GSOO would be beneficial?
2	Do stakeholders agree that formalising a requirement for AEMO to include information on decarbonisation pathways in the GSOO would be beneficial?
Amendments to the definitions of Nameplate Capacity, Capacity Outlook, and Medium Term Capacity Outlook	
3a	Do stakeholders agree that amending the definition of Nameplate Capacity would allow parties to better understand the capabilities of individual facilities?
3b	Do stakeholders consider that the amended definition (see section 4.1.1) is appropriate? If not, what amendments could be made to better achieve the intent?
4a	Do stakeholders agree that amending the definition of Capacity Outlook will allow participants to better understand the expected utilisation of individual facilities?
4b	Do stakeholders consider that the amended definition (see section 4.1.2) is appropriate? If not, what amendments could be made to better achieve the intent?
5	Do stakeholders agree that inclusion of a free text field will allow the market to better understand Capacity Outlook reporting and how outages impact the ability of facilities to supply gas?
6a	Do stakeholders agree that amending the definition of the MTCO would avoid potential misalignment of information and allow participants to better understand the expected output of individual facilities?
6b	Do stakeholders consider that the amended definition (see section 4.1.3) is appropriate? If not, what amendments could be made to better achieve the intent?
Amendments to data reported on the GBB	
7a	Do stakeholders agree that amending the definition of an LCA Flag to remove the obligations for Storage Facilities is appropriate?
7b	Do stakeholders consider that the amended definition (see section 4.2) is appropriate? If not, what amendments could be made to better achieve the intent?
8	Do stakeholders agree that including net zone consumption on the GBB would eliminate the issue of double counted gas and provide better transparency to participants?
9a	Do stakeholders agree that providing information related to GPG on the GBB would be meaningful and useful to gas market participants?
9b	If so, what information would be needed to adequately provide greater transparency to the market?
9c	What other additional information should be included on the GBB and how would this information be of value to gas market participants?
Improving consistency with information provisions in the WA National Gas Law and Rules	
10a	Do stakeholders consider that it is appropriate to introduce a principles-based information standard into the GSI Rules, modelled after those included on the NGL/NGR?
10b	If not, what alternative approach would better suit the GSI framework?

Consultation questions	
10c	If yes, which of the two proposed information standards do stakeholders consider to be the most appropriate set of requirements to model these principles after?
11a	Do stakeholders consider that the introduction of such a clause to be appropriate to ensure that information is not being withheld from the market on confidence grounds?
11b	Do stakeholders agree that this will help provide better transparency and support consistent compliance with GSI reporting obligations?
Accommodating gases other than natural gas	
12a	Do stakeholders agree that introducing provisions for 'other gases' into the GSI framework would at present be of limited benefit?
12b	If so, what do stakeholders consider to be an appropriate trigger to begin integrating 'other gases' into the GSI framework?
Transparency of ERA investigations	
13a	Do stakeholders agree that introducing a public register of investigations to the GSI Rules, modelled on that in the ESM Rules, will help improve information transparency in the WA gas market?
13b	Do stakeholders consider that such a register will help to modify participant behaviour?
Increasing awareness of domestic gas reporting obligations	
14	Do stakeholders agree that a link to the WADGS should be included on the GBB, once it is released by DEED, to increase awareness of the Statement and domestic gas reporting obligations?

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