

9 February 2026

Ms Dora Guzeleva  
Director Wholesale Markets  
Energy Policy WA  
[energymarkets@deed.wa.gov.au](mailto:energymarkets@deed.wa.gov.au)

Dear Ms Guzeleva,

### **Review of the Gas Services Information (GSI) Rules**

The Australian Energy Market Operator (AEMO) appreciates the opportunity to provide a submission on the review of the Gas Services Information (GSI) Rules consultation paper (Consultation Paper), which seeks to make improvements to the GSI Rules, following the Parliamentary Inquiry into the WA Domestic Gas Policy and reforms to the National Gas Law and National Gas Rules.

### **Formalising improvements to the Gas Statement of Opportunities (GSOO) in the GSI Rules**

AEMO has proactively implemented recommendations from the Inquiry into the WA Domestic Gas Policy by expanding the GSOO to:

- Extend the forecast outlook for gas capacity and demand from 10 years to 20 years to support longer-term investment planning and enhanced market visibility.
- Incorporate forecast decarbonisation pathways that are informed by industry input on fuel-switching, electrification and the use of carbon capture and storage.
- Align the modelling scenarios with those used for the Wholesale Electricity Market (WEM) Electricity Statement of Opportunities (ESOO) to recognise the interdependencies between the state's gas and electricity markets, including an enhanced gas infrastructure adequacy assessment to evaluate upstream constraints on gas supply.

AEMO supports EPWA's proposal to amend the GSI Rules to formalise improvements to the GSOO by extending the forecast outlook for gas capacity and demand from 10 years to 20 years, and requiring the GSOO to include forecasts of the decarbonisation pathways for WA gas users.

AEMO recommends that the forecast outlook extension is only applied to the forecast outlook for gas capacity and demand, but not gas infrastructure adequacy. The Consultation Paper notes that the extended infrastructure adequacy forecast is necessary given the scheduled exit of coal-fired generation and lengthy timelines associated with infrastructure projects for gas pipelines and processing facilities. AEMO's experience and forecasts, including via the 2025 WA GSOO, forecast the exit of coal-fired generation in 2030 and has shown that pipeline infrastructure development timeframes are generally significantly less than 10 years. Due to this, and the inherent uncertainty associated with long term forecasts, an extension to the infrastructure adequacy forecast is likely to result in additional costs, with limited benefit.

### **Improvements to the Medium Term Capacity Outlook**

AEMO supports EPWA's proposed amendments to the definition for Medium Term Capacity Outlook so that it improves transparency by reflecting actual gas capacity. To improve transparency further and assist with emergency planning, AEMO recommends amendments to rule 71(4) of the GSI Rules to remove the exemption for Registered Production Facility Operators with respect to making updates to the Medium Term Capacity Outlook where there are material changes covered by the period of the seven day Capacity Outlook (provided for under rule 72).

This change could assist the Coordinator of Energy when determining whether the Emergency Management Facility (EMF) should be activated by identifying available headroom that could be utilised in emergency situations. Available headroom could be calculated by comparing accurate and up to date capacity information provided via the Medium Term Capacity Outlook against expected utilisation provided via the seven day Capacity Outlook.

AEMO looks forward to continuing to work with EPWA on finalising the recommended proposals. This includes continuing to improve the information published on the Gas Bulletin Board (GBB). Should you have any queries about this submission, please contact Sarah Graham, Manager Regulatory Affairs at [REDACTED]

Yours sincerely,

[REDACTED]  
Kirsten Rose

**Executive General Manager – WA and Strategy**