

9 February 2026

Energy Policy WA
Department of Energy and Economic Diversification (DEED)
Via email submission

Dear Energy Policy WA team,

Re: Review of the Gas Services Information (GSI) Rules

Australian Gas Infrastructure Group (AGIG) welcomes the opportunity to provide a response to the Review of the Gas Services Information (GSI) Rules Consultation Paper. Transparency settings in Western Australia's (WA) gas market should support system reliability, efficient investment and informed market participation, while remaining proportionate to the scale and maturity of emerging developments.

AGIG's vision is to deliver infrastructure essential to a sustainable energy future. Through our assets including the Dampier to Bunbury Natural Gas Pipeline (DBNGP) and the Tubridgi Gas Storage (TGS) Facility, distribution networks, and renewable gas projects, we deliver energy to more than two million Australians every day that value gas for its reliability, affordability, and performance. These assets play a central role in system adequacy, security of supply and the facilitation of gas-powered generation (GPG), mining, and manufacturing across WA and throughout Australia.

In line with our Net Zero Ambition, we are actively progressing with our carbon capture and storage (CCS) hub in the Pilbara and are considering a program of work to explore potential for CCS at our TGS facility – which has the potential to store significant volumes of carbon over time. Given the scale and criticality of these assets to the WA gas system, the effectiveness of the GSI framework directly affects investment planning, operational decision-making and risk management across the supply chain.

AGIG broadly supports the direction of the proposed reforms. We note that some proposals have been implemented in the 2025 WA Gas Statement of Opportunities (GSOO) prior to this consultation and note the opportunity for stakeholder feedback from this consultation to be incorporated in 2026 WA GSOO. This submission focuses on proposals that materially affect system visibility, long-term planning and the treatment of emerging renewable gases.

Extending the GSOO Forecast Period (Proposal 1)

AGIG supports the extension of the GSOO forecast period to 20 years to support long-term energy security planning in WA. Developments in gas supply and infrastructure are characterised by long asset lives and multi-year development lead times (up to around 9 years per the AEMO 2025 Gas Infrastructure Options Report)¹.

A longer forecast horizon better reflects these structural characteristics. Extending the forecast period would support consistency with the East Coast GSOO and strengthen visibility of longer-term supply adequacy to support more proactive, efficient planning and investment decisions to maintain system reliability over time.

However, extending the forecast period will not in itself improve forecast accuracy. Uncertainty increases materially over longer horizons due to variability in production profiles, demand trajectories, technology uptake and policy settings. The value of a 20-year outlook therefore lies primarily in scenario analysis and system stress testing rather than deterministic investment signals. We recommend AEMO carefully considers a wide range of plausible scenarios and explicitly state the increased uncertainty associated with extending the forecast to 20 years when drafting the upcoming WA GSOO.

Decarbonisation Pathways (Proposal 2)

AGIG supports the continued development of emissions reduction scenarios within the WA GSOO. Scenario modelling should reflect the evolving role of natural gas, CCS, renewable gases and other emissions reduction technologies in maintaining reliability while reducing emissions to achieve net zero in line with targets. However, the exclusion of

¹ AEMO (2025) *2025 Gas Infrastructure Options Report*. Available at: https://www.aemo.com.au/-/media/files/stakeholder_consultation/consultations/nem-consultations/2025/2025-gas-infrastructure-options-report/2025-gas-infrastructure-costs-report.pdf

hydrogen from the quantitative forecast and the absence of biomethane consideration from the 2025 WA GSOO risk underplaying the role of these renewable gases as viable emissions reduction pathways. As part of the 2025 East Coast GSOO, AEMO engaged with ACIL Allen to forecast hydrogen production and biomethane volume across all Australian jurisdictions, including in WA.² We recommend AEMO apply the WA hydrogen and biomethane forecast presented in the ACIL Allen report in the next iteration of WA GSOO, ensuring that renewable gases are appropriately represented in the long-term energy planning for WA.

We encourage AEMO to use the term “Net Zero Pathways” rather than “Decarbonisation Pathways”, as this better reflects Australia’s and WA’s net zero targets and the essential role of natural gas in achieving net zero, enabled through CCS, offsets and other carbon removal measures. By contrast, “decarbonisation” can be interpreted as requiring complete elimination of emissions, rather than achieving net zero outcomes.

Natural gas will remain important as a firming and backup capacity for the electricity grid in the energy transition, while CCS is offering a promising pathway to reduce emissions from natural gas use in GPG. We are actively progressing to deliver a CCS hub in the Pilbara and are considering a program of work to explore potential for CCS at our TGS facilities. Furthermore, as a result of the WA Feasibility Study, there is now a clear pathway for declaring a pipeline section of the DBNGP as suitable for use with hydrogen/natural gas blends.³

Removal of Obligations for Storage Facilities to Report Linepack Capacity Adequacy (LCA) (Proposal 7)

Storage facilities such as TGS play a critical role in maintaining gas system adequacy and reliability, particularly during periods of high demand or when the production facilities are experiencing outages. Although storage facilities already publish a daily Capacity Outlook, an LCA Flag serves a different but complementary purpose, providing a simple system-wide adequacy signal that indicates whether a gas storage facility is capable of meeting forecast demand under prevailing conditions.

Removing the obligation for storage facilities to report LCA Flags may reduce transparency and limit the availability of clear, forward-looking information for market participants to plan their operations, particularly during periods of system stress. Without this indicator, stakeholders have reduced ability to anticipate emerging supply constraints or to respond effectively to changing system conditions. Therefore, we recommend this obligation to be retained to support consistency, transparency, and confidence in system adequacy signals.

Reporting GPG Information (Proposal 9)

We support the provision to report GPG information in the Gas Bulletin Board (GGB). GPG facilities represent a significant and potentially volatile source of demand, particularly as additional GPG capacity becomes available to support grid reliability. Increased transparency on GPG operations would assist gas market participants in understanding key demand drivers and assessing both current and future market conditions.

Additional information that would be valuable in improving gas market planning is the inclusion of notifications of planned and unplanned outages of GPG facilities or other events that could materially affect GPG gas consumption. From AGIG’s perspective, this information would enhance our ability to anticipate demand fluctuations and forecast gas flow patterns in our DBNGP operations.

Publishing aggregated gas consumption data for GPG facilities would also support gas market participants in understanding demand trends and the scale of gas usage attributed to GPGs. This information would support informed planning to ensure sufficient and equitable supply of gas across households, industrial consumers, and GPG facilities.

Review Trigger Event for ‘Other Gases’ (Proposal 12)

We believe that introducing provisions for ‘other gases’ could still provide meaningful benefits at this stage. Early consideration of renewable gases within the GSI architecture can support orderly market development as projects scale. Drawing on the East Coast GSOO, the review trigger to include hydrogen and biomethane is when these gases were incorporated into the National Gas Law (NGL). We recommend a similar review trigger could be applied in WA when ‘other gases’ are included into the regulatory framework (expected in 2026).

² ACIL Allen (2025) *Gas, liquid fuel, coal and renewable gas projections*. Available at: <https://www.aemo.com.au/-/media/files/major-publications/isp/2025/acil-allen-2024-fuel-price-forecast-report.pdf>

³ AGIG (2022) *Dampier to Bunbury Natural Gas Pipeline Public Knowledge Sharing Report*. Available at: <https://www.agig.com.au/-/media/files/agig/annual-reports/dampier-to-bunbury-natural-gas-pipeline-public-knowledge-sharing-report.pdf>

Hydrogen blending has been operational in WA since 2022, and additional hydrogen and biomethane developments are progressing, including hydrogen projects for industrial use and a proposed biomethane-to-gas-grid project.⁴ While volumes remain limited, these projects signal a transition toward greater integration of natural and renewable gases to support the wider system.

Additionally, under the WA Renewable Hydrogen Strategy 2024-2030 the production of hydrogen at scale is expected to commence by 2030, supported through the expanded Investment Attraction Fund.⁵ On that basis, it is reasonable to expect that hydrogen volumes could become system-relevant within the next decade, warranting forward consideration in the GSI framework.

Thank you for considering our submission. Please contact Owen Sharpe, Strategy and Policy Manager [REDACTED], if you would like to discuss further.

Kind Regards,

[REDACTED]
Cathryn McArthur
Executive General Manager
Customer and Strategy

⁴ ACIL Allen (2025) *Gas, liquid fuel, coal and renewable gas projections*. Available at: <https://www.aemo.com.au/-/media/files/major-publications/isp/2025/acil-allen-2024-fuel-price-forecast-report.pdf>

⁵ Department of Jobs, Tourism, Science and Innovation (2024) *Western Australia's Renewable Hydrogen Strategy*. Available at: https://www.wa.gov.au/system/files/2024-10/00410_hydrogen_strategy_web.pdf