

9 February 2026

Energy Policy WA  
Level 1, 66 St Georges Tce  
PERTH WA 6000

Via email: [energymarkets@deed.wa.gov.au](mailto:energymarkets@deed.wa.gov.au)

## REVIEW OF THE GAS SERVICES INFORMATION RULES: CONSULTATION PAPER

Thank you for the opportunity to comment on the proposals to amend the Gas Services Information (GSI) Rules. We generally support the proposed evolution and enhancement of the GSI Rules and provide the following feedback for consideration.

### Alinta Energy makes the following recommendations:

1. Further detailed consideration of the reliability and evidentiary basis of a 20-year gas supply and demand forecast is required to ensure the Gas Statement of Opportunities (GSOO) provides meaningful guidance for long-term energy planning.
2. Any expanded modelling requirements should be met through improved use of existing datasets, coordination with other regulated processes and transparent methodological development rather than increased participant reporting.
3. Ensure that the GSOO's decarbonisation pathways deliver an outlook that accurately reflects the full range of future technology possibilities by requiring the modelling framework to remain technology neutral, transparently constructed, and supported by multiple credible scenarios that avoid unintentionally biasing investment signals or constraining future technological development.
4. The obligation on AEMO to publish gas powered generation information from the Wholesale Electricity Market (WEM) on the Gas Bulletin Board (GGB) should be limited to information that is already publicly available on the WEM website, ensuring no inadvertent disclosure of commercially sensitive operational data.
5. The inclusion of principles for information standards in the GSI Rules is not required as there is already sufficient guidance on information provision and the proposed approach is unlikely to be effective.
6. Do not amend the GSI Rules to accommodate "other gases", instead monitor technological developments, market evolution and potential uptake trends, and establish appropriate regulatory frameworks only when the characteristics, commercial pathways and information needs are sufficiently understood.

Alinta Energy recognises the role of market transparency in maintaining confidence in Western Australia's gas supply outlook and, ultimately, continuity of sufficient gas supply for domestic use. Collectively, the Review outcomes appear to signal an intent to make the GSI framework more reliable and decision useful for government and market participants. However, to ensure the proposed reforms deliver net benefit (and do not inadvertently add complexity without improving outcomes), each proposed new obligation should be supported by a clear cost-benefit case that identifies potential alternate pathways to achieve the transparency objective.

If the policy objective of the proposed amendments to the GSI Rules is continuity of sufficient gas supply, the information focus should prioritise the relevant aspects of live gas production specifically, domestic production volume and rate of each facility, as this is the most direct, time-sensitive indicator of how much gas is available for consumption (including volumes available for short-term trading and spot procurement) on any given trading day. As the majority of gas supply is traded via confidential long-term bilateral contracts, transparent, facility-level production signals can add significant value in providing a near real time baseline for assessing system tightness, emerging supply risks, and enabling timely operational and procurement decisions without requiring disclosure of commercially sensitive contract information.

While we strongly advocate for the inclusion of aggregated live gas production data on the Gas Bulletin Board (GGB), the following recommendations are made in response to the specific proposals set out in the consultation paper.

**1. Further detailed consideration of the reliability and evidentiary basis of a 20 year gas supply and demand forecast is required to ensure the GSOO provides meaningful guidance for long-term energy planning.**

While we do not object to the principle of extending the GSOO forecast horizon, doing so must be accompanied by methodological safeguards that materially improve the robustness and reliability of the long-term forecast. A 20 year outlook will necessarily rely on assumptions and inputs that become increasingly uncertain over time, particularly where key information is sourced from participants whose own corporate contracting or operational forecasts may not extend to the same horizon. Without safeguards, such as transparent treatment of uncertainty, structured scenario design, and strengthened input validation, an extended forecast risks becoming more speculative than decision useful, despite the intent to improve the GSOO.

Critically, a forecast that is not demonstrably robust and reliable does not enhance Western Australia's energy security planning, because it cannot be relied upon to underpin policy, investment and infrastructure decisions in a credible way. In practical terms, an unreliable long-term projection may fail to address the very concerns that the proposed GSOO improvements are intended to support, and it may also inadvertently embed an overly conservative negative outlook that influences stakeholder perceptions and decisions without accurately reflecting future reality. To strengthen reliability, consideration could be given to:

- publishing confidence bands and sensitivities around core assumptions;
- using multiple scenarios (including credible high/low demand and supply development pathways);
- clearly separating participant provided inputs from externally validated assumptions; and
- introducing minimum, standardised forward indicators where participants cannot provide long term horizon forecasts.

Without robust methodologies and accurate inputs, a 20 year outlook risks providing limited practical value and may even undermine confidence in Western Australia's energy security planning by embedding assumptions that are not well founded. It is therefore recommended that further and more detailed consideration of the reliability and evidentiary basis of a 20 year forecast is required to ensure the GSOO provides meaningful guidance for long-term energy security planning.

**2. Any expanded modelling requirements should be met through improved use of existing datasets, coordination with other regulated processes and transparent methodological development rather than increased participant reporting.**

While both proposals to improve the GSOO have a clear intent, there is insufficient detail to understand any additional obligations that may be imposed on participants in relation to the provision of information that will be required or how the forecast models themselves will be constructed. Given the significant reporting burden already placed on gas market participants, electricity generators and retailers, any obligations that would require industry to provide further long term data, particularly for the development of a 20 year supply/demand forecast and for the development of decarbonisation pathways, would increase compliance costs without clear evidence that the additional information would materially improve long term energy planning decisions.

Any expanded modelling information or data requirements should be met through improved use of existing datasets, coordination with other government processes, and/or improved methodological development rather than increased participant reporting obligations. In particular, decarbonisation pathways for publication in the GSOO should be developed using publicly available data, independently verified assumptions, and transparent modelling logic, rather than relying on participants to produce bespoke data that they may not have.

**3. Ensure that the GSOO's decarbonisation pathways deliver an outlook that accurately reflects the full range of future technology possibilities by requiring the modelling framework to remain technology neutral, transparently constructed, and supported by multiple credible scenarios that avoid unintentionally biasing investment signals or constraining future technological development.**

For the GSOO to meaningfully inform long-term energy planning, the modelling framework for decarbonisation pathways must avoid structural or assumption-based biases that could unintentionally narrow the State's future technology and decarbonisation options. If the framework embeds rigid scenarios or favours particular pathways, such as electrification or specific renewable gas solutions, it risks presenting an outlook that under represents the potential of other emerging technologies, thereby influencing policy and investment decisions in ways that do not reflect actual market potential. To achieve an outcome that genuinely supports innovation and maintains an open, competitive technological landscape, the methodology for determining decarbonisation pathways for publication in the GSOO should adopt a technology neutral structure, incorporate multiple credible scenarios and sensitivities, and provide transparent disclosure of assumptions and modelling logic. This will help ensure the outlook remains balanced, future-focused, and capable of enabling Western Australia's broader decarbonisation objectives.

**4. The obligation on AEMO to publish gas powered generation information from the Wholesale Electricity Market (WEM) on the Gas Bulletin Board (GBB) should be limited to information that is already publicly available on the WEM website, ensuring no inadvertent disclosure of commercially sensitive operational data.**

In relation to the proposal that AEMO be required to publish gas-powered generation WEM information on the GBB, it is essential that this obligation be strictly limited to information that is already publicly available on the WEM website. Publishing any additional or more granular operational details on the GBB risks creating an additional compliance burden and inadvertently revealing commercially sensitive information about individual generators, including dispatch patterns, fuel use behaviours and operational strategies that are not currently disclosed. To avoid introducing new and potentially time consuming obligations for a subset of gas users, and exposing sensitive data that could influence competitive dynamics in both the electricity and gas markets, the scope of AEMO's publication obligation should be tightly constrained to the existing suite of publicly available WEM information, with no expansion in detail, frequency or format beyond what is already disclosed.

In addition, the WEM operates as a more dynamic market that operates in close to real time (five minute Dispatch Intervals and thirty minute Trading Intervals), making its operational data difficult to reconcile with the comparatively static information published on the GBB. Consideration is therefore required to ensure the publishing of gas powered generation information from the WEM onto the GBB is meaningful and cohesive, rather than creating data that lacks context or practical usefulness.

**5. The inclusion of principles for information standards in the GSI Rules is not required as there is already sufficient guidance on information provision and the proposed approach is unlikely to be effective.**

While the intention to strengthen the accuracy of information within the GSI framework is understood, the GSI Rules already provide a clear structure for participant obligations, data submission requirements and the treatment of information. Introducing additional high level principles may offer limited practical value, particularly as principles are generally non-binding in nature and rely on interpretation rather than enforceable standards. This raises questions about necessity and effectiveness, especially when existing guidance already sets expectations for information provision.

Nonetheless, there is no objection to incorporating these principles provided they do not expand participant obligations. Should the initiative proceed, it is important that any principles adopted are consistent with the Access Information Standard in the Western Australian National Gas Rules to ensure a harmonised regulatory approach and avoid inconsistencies across information frameworks governing WA's gas sector.

**6. Do not amend the GSI Rules to accommodate "other gases", instead monitor technological developments, market evolution and potential uptake trends, and establish appropriate regulatory frameworks only when the characteristics, commercial pathways, and information needs are sufficiently understood.**

Although the broader energy transition will eventually involve renewable alternate gases, their development pathways, technologies, cost trajectories, and expected rates of adoption remain highly uncertain. The existing GSI framework was designed specifically for gas and reflects the structure of Western Australia's current domestic gas market. Attempting to incorporate "other gases" prematurely risks creating obligations or information categories that may not align with how these fuels will ultimately be produced, transported, stored, or consumed. Given this uncertainty and noting that the GSI Rules are intended to support transparency and security for the existing gas market, it would be prudent to monitor technological progress and market uptake before embedding new requirements. Establishing tailored regulatory frameworks at the appropriate time will ensure accuracy, relevance, and proportionality, rather than fitting emerging gases into a structure that may not suit their future operational reality.

We welcome further engagement on the Review outcomes as part of the consultation process for any GSI Amending Rules. Should you require further information or wish to discuss any aspect of our submission please do not hesitate to contact me at [REDACTED]

Yours sincerely

**Oscar Carlberg**  
Regulatory Affairs Manager