

09 February 2026

Attn: Dora Guzeleva  
Director, Wholesale Markets  
Energy Policy WA  
Level 1, 66 St Georges Terrace  
Perth WA 6000

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

Dear Ms Guzeleva,

**Review of the Gas Services Information Rules – Consultation Paper**

Thank you for the opportunity to comment on Energy Policy WA's Consultation Paper on the Gas Services Information Rules Review released on 15 December 2025.

APA appreciates the work undertaken to date to consult with industry on the proposed improvements, including through the Gas Services Information Rules working group.

APA suggest that further work is required in a couple of areas to ensure that the proposed improvements remain functional in achieving their core purpose. The attachment to this letter provides APA's response to each of the proposals put forward by Energy Policy WA.

Should you have any questions or wish to discuss our submission please contact Jack Rowe on

[REDACTED]

Yours sincerely,

[REDACTED]

**Lizzie O'Brien**  
Senior Regulatory Manager  
Strategy and Corporate Development

## Attachment 1: APA response to proposals

### Gas Statement of Opportunities (GSOO)

Energy Policy WA proposal	APA response
<p><b>Proposal 1: Extend the GSOO forecast period</b></p> <ul style="list-style-type: none"> <li>Amend the GSI Rules to extend the minimum forecast period for the GSOO from “at least 10 years” to 20 years.</li> </ul> <p><b>Proposal 2: Include decarbonisation pathways in the GSOO</b></p> <ul style="list-style-type: none"> <li>Amend the requirements for the GSOO to also include decarbonisation pathways.</li> </ul>	<p>APA is neutral regarding Proposal 1. While we understand that the information may help inform more detailed modelling it is likely that the information available past 10 years may be less consistent and therefore unreliable. Should information be required in the 10 to 20 years out period, we suggest this be included to the extent the information is reliable.</p> <p>APA has no comment on Proposal 2.</p>

### Improved definitions and reporting standards

Energy Policy WA proposal	APA response
<p><b>Proposal 3: Amend the definition of Nameplate Capacity</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Proposal 4: Amend the definition of Capacity Outlook</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Proposal 5: Improve Capacity Outlook reporting</b></p> <ul style="list-style-type: none"> <li>Add a free text field to Capacity Outlook reporting on the GBB.</li> </ul> <p><b>Proposal 6: Amend the definition of Medium Term Capacity Outlook</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>	<p>APA supports these proposed changes.</p>

## Amendments to data reported on the WA Gas Bulletin Board

Energy Policy WA proposal	APA response
<p><b>Proposal 7: Remove Linepack capacity adequacy (LCA) Flags for Storage Facilities</b></p> <ul style="list-style-type: none"> <li>Remove the obligation for Storage Facilities to provide LCA Flags, consistent with the treatment of a Production Facility.</li> </ul> <p><b>Proposal 8: Clarify GBB Zone reporting by including net consumption</b></p> <ul style="list-style-type: none"> <li>Include net consumption of WA zones on the GBB in addition to Total Receipt and Total Delivery volumes.</li> </ul> <p><b>Proposal 9: Include gas related WEM data</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>	<p>APA supports these proposed changes.</p> <p>Regarding Proposal 9, APA agrees gas related WEM data is useful for parties such as AEMO and the State inline with Recommendation 23. However, we suggest further consideration be given to the benefits of publishing information on the GBB that is not already published elsewhere. In particular, the usefulness of publishing linepack information and detailed peak-consumption patterns needs to be balanced against considerations of confidentiality and commercially sensitive information.</p> <p>We also note work is required to understand the feasibility of reporting information on linepack in the manner suggested in the Consultation Paper.</p>

## Consistency with information provisions in the National Gas Rules

Energy Policy WA proposal	APA response
<p><b>Proposal 10: Introducing principles for Information Standards</b></p> <ul style="list-style-type: none"> <li>Introduce principles from the NGL and NGR information standards into the GSI Rules to ensure adequate accuracy of information.</li> </ul> <p><b>Proposal 11: Introduce a duty of confidence clause</b></p> <ul style="list-style-type: none"> <li>Introduce a clause clarifying that a duty of confidence is not a reason for non-compliance with the GSI Rules.</li> </ul>	<p>APA supports these proposed changes.</p>

## Other Gases' Package implications for the GSI Framework

Energy Policy WA proposal	APA response
<p><b>Proposal 12: 'Other gases' review trigger event</b></p> <ul style="list-style-type: none"> <li>Determine a trigger event to initiate a review of changes required to accommodate 'other gases' on the GBB and in the GS00.</li> </ul>	<p>APA recommends that this review be optional when the trigger occurs based on an assessment made by the Coordinator of Energy in consultation with industry.</p>

### Transparency of ERA investigations

Energy Policy WA proposal	APA response
<p><b>Proposal 13: Public register of investigations</b></p> <ul style="list-style-type: none"> <li>– Adopt and adapt the concept of the public register of investigations from the Electricity System and Market (ESM) Rules in the GSI Rules.</li> </ul>	<p>APA supports this proposed change.</p>

### Increasing awareness of domestic gas reporting obligations

Energy Policy WA proposal	APA response
<p><b>Proposal 14: Increase awareness of domestic gas reporting obligations.</b></p> <ul style="list-style-type: none"> <li>– A link to the WA Domestic Gas Statement should be included on the GBB once it has been published by DEED.</li> </ul>	<p>APA has no comment on this proposal.</p>