

Review of the Gas Services Information Rules

Consultation paper

Australian Energy Producers | 9 February 2026

Australian Energy Producers (AEP) welcomes the opportunity to provide comment on the Energy Policy WA (EPWA) consultation paper entitled 'Review of the Gas Services Information (GSI) Rules'. AEP supports measures that enhance transparency in the Western Australian domestic gas market and provide greater public understanding on the implementation of domestic gas policy. In doing so, however, AEP would argue the disclosure of information that is explicitly commercial in nature should be avoided. AEP notes that recent initiatives to enhance market transparency have been largely focused on gas producers. For a market to operate effectively, rules and transparency obligations must apply equally to buyers and sellers. This submission provides comment only on items directly relevant to AEP member companies.

Extend the Gas Statement of Opportunities (GSOO) forecast period

AEP notes the proposed changes to the Gas Statement of Opportunities (GSOO) to extend the minimum forecast period to 20 years. Notwithstanding our previous public comments on the feasibility and relevance of a 20-year outlook, which results in less accurate forecasts, AEP acknowledges this change has already been implemented and will be formally adopted. AEP will continue to argue that forecasts should not be based on prospective resource data and stands ready to identify a more practical approach to ensuring longer-term transparency.

Include decarbonisation pathways in the GSOO

AEP does not support amending the GSOO to include decarbonisation pathways. Although AEMO already includes this analysis voluntarily, making it compulsory removes flexibility and creates compliance challenges. Gas producers assess and progress decarbonisation opportunities across their assets on an ongoing basis, however, the impact on fuel gas consumption is not always available. Requiring AEMO to incorporate decarbonisation scenarios could reduce the usefulness of the GSOO as a technical forecasting document given uncertainties around technology adoption, policy design and emissions trajectories.

Amend the definition of Nameplate Capacity

While broadly supportive of the intent of this proposal AEP believes the frequency of reporting on changes to nameplate capacity should not be overly onerous. AEP notes that any updates to nameplate capacity will only be required for significant and permanent modifications to the operating limits of a production facility.

Increase awareness of domestic gas reporting obligations

AEP strongly supports opportunities to improve the understanding of the WA gas market. Increasing awareness of domestic gas reporting obligations by including the WA Domestic Gas Statement (WADGS) on the Gas Bulletin Board (GGB) run by the Australian Energy Market Operator is commended. The WADGS is a voluntary initiative stemming from productive industry-government collaboration through the Department of Energy and Economic

Diversification (DEED). The WADGS plays an important role in providing clear information on domestic gas supply and policy compliance. Adding a link on the GBB is a practical step towards raising awareness and complements the current practice of reporting on the DEED website without imposing new obligations. AEP notes that annual reporting of domestic gas sales delivers enhanced market transparency without placing an undue administrative burden on member companies. AEP does not believe there is a need for greater frequency of reporting in the absence of evidence this would improve market outcomes.

In concluding, AEP notes there is a planned review of the WADGS in 2026 and looks forward to continuing to work with government agencies on domestic gas market transparency for both gas consumers and gas producers as well as on broader enhancements to the GSI framework.