

Meeting Agenda

Meeting Title:	Gas Advisory Board
Meeting Number:	2026_03_05
Date:	Thursday 5 March 2026
Time:	1:30 to 3:00 PM
Location:	Online, via TEAMS

Item	Item	Responsibility	Type	Duration
1	Welcome and Agenda <ul style="list-style-type: none"> Conflict of interest Competition Law 	Chair	Noting	3 min
2	Meeting Apologies/Attendance	Chair	Noting	5 min
3	Action Items	Chair	Noting	2 min
4	ERA's compliance monitoring and enforcement update	ERA	Noting	15 min
5	Review of the Gas Services Information (GSI) Rules update	Chair of the GSIRRWG	Discussion	60 min
6	Overview of Rule Change Proposals	Chair	Noting	1 min
7	General Business	Chair	Discussion	4 min
	Next Meeting: 27 August 2026			

Please note this meeting will be recorded.

Competition and Consumer Law Obligations

Members of the Gas Advisory Board (**Members**) note their obligations under the *Competition and Consumer Act 2010 (CCA)*.

If a Member has a concern regarding the competition law implications of any issue being discussed at any meeting, please bring the matter to the immediate attention of the Chairperson.

Part IV of the CCA (titled “Restrictive Trade Practices”) contains several prohibitions (rules) targeting anti-competitive conduct. These include:

- (a) **cartel conduct:** cartel conduct is an arrangement or understanding between competitors to fix prices; restrict the supply or acquisition of goods or services by parties to the arrangement; allocate customers or territories; and or rig bids.
- (b) **concerted practices:** a concerted practice can be conceived of as involving cooperation between competitors which has the purpose, effect or likely effect of substantially lessening competition, in particular, sharing Competitively Sensitive Information with competitors such as future pricing intentions and this end:
 - a concerted practice, according to the ACCC, involves a lower threshold between parties than a contract arrangement or understanding; and accordingly; and
 - a forum like the GAB is capable being a place where such cooperation could occur.
- (c) **anti-competitive contracts, arrangements understandings:** any contract, arrangement or understanding which has the purpose, effect or likely effect of substantially lessening competition.
- (d) **anti-competitive conduct (market power):** any conduct by a company with market power which has the purpose, effect or likely effect of substantially lessening competition.
- (e) **collective boycotts:** where a group of competitors agree not to acquire goods or services from, or not to supply goods or services to, a business with whom the group is negotiating, unless the business accepts the terms and conditions offered by the group.

A contravention of the CCA could result in a significant fine (up to \$500,000 for individuals and more than \$10 million for companies). Cartel conduct may also result in criminal sanctions, including gaol terms for individuals.

Sensitive Information means and includes:

- (a) commercially sensitive information belonging to a Member’s organisation or business (in this document such bodies are referred to as an Industry Stakeholder); and
- (b) information which, if disclosed, would breach an Industry Stakeholder’s obligations of confidence to third parties, be against laws or regulations (including competition laws), would waive legal professional privilege, or cause unreasonable prejudice to the Coordinator of Energy or the State of Western Australia).

Guiding Principle – what not to discuss

In any circumstance in which Industry Stakeholders are or are likely to be in competition with one another a Member must not discuss or exchange with any of the other Members information that is not otherwise in the public domain about commercially sensitive matters, including without limitation the following:

- (a) the rates or prices (including any discounts or rebates) for the goods produced or the services produced by the Industry Stakeholders that are paid by or offered to third parties;
- (b) the confidential details regarding a customer or supplier of an Industry Stakeholder;
- (c) any strategies employed by an Industry Stakeholder to further any business that is or is likely to be in competition with a business of another Industry Stakeholder, (including, without limitation, any strategy related to an Industry Stakeholder’s approach to bilateral contracting or bidding in the energy or ancillary/essential system services markets);
- (d) the prices paid or offered to be paid (including any aspects of a transaction) by an Industry Stakeholder to acquire goods or services from third parties; and
- (e) the confidential particulars of a third party supplier of goods or services to an Industry Stakeholder, including any circumstances in which an Industry Stakeholder has refused to or would refuse to acquire goods or services from a third party supplier or class of third party supplier.

Compliance Procedures for Meetings

If any of the matters listed above is raised for discussion, or information is sought to be exchanged in relation to the matter, the relevant Member must object to the matter being discussed. If, despite the objection, discussion of the relevant matter continues, then the relevant Member should advise the Chairperson and cease participation in the meeting/discussion and the relevant events must be recorded in the minutes for the meeting, including the time at which the relevant Member ceased to participate.



Agenda Item 3: Gas Advisory Board (GAB) Action Items

Meeting 2026_03_05

Shaded	Shaded action items are actions that have been completed since the last GAB meeting.
Unshaded	Unshaded action items are still being progressed.
Missing	Action items missing in sequence have been completed from previous meetings and subsequently removed from log.

Item	Action	Responsibility	Meeting Arising	Status/Progress
112	The Economic Regulation Authority (ERA) is to annually provide information and updates to the GAB on the ERA’s compliance processes.	ERA	2022_10_27	Open Provided at Agenda Item 4
122	The ERA is to prepare and deliver a compliance monitoring and enforcement update at the March 2026 meeting of the GAB	ERA	2025_10_23	Closed Provided at Agenda Item 4



Agenda Item 4: The ERA's Compliance Monitoring and Enforcement under the GSI Rules

Gas Advisory Board (GAB) Meeting 2026_03_05

1. Purpose

In response to Action Items 112 and 122, the Economic Regulation Authority (ERA) will provide information and updates to the GAB on the ERA's compliance monitoring and enforcement process under the GSI Rules on an annual basis.

2. Recommendation

That the GAB notes:

- the information provided in this paper; and
- discusses the attached presentation from the ERA.

3. Background

At its meetings on 23 September 2021, 28 October 2021, 24 March 2022 and 27 October 2022, the GAB discussed:

- the interpretation of the information provision requirements in Part 3 of the GSI Rules;
- a potential reporting gap related to producer outages, which may not be captured as part of the emergency management system reporting; and
- a gap analysis of the information provision requirements under the GSI Rules.

At its 24 March 2022 meeting, the GAB concluded that the issue is not caused by the information provision requirements in the GSI Rules and may instead relate to compliance with the reporting requirements. The GAB sought clarification on the process for stakeholders to raise compliance concerns, which was discussed at the GAB meeting on 27 October 2022.

At its 27 October 2022 meeting, the GAB concluded that the ERA should provide annual information and updates to the GAB on the ERA's compliance processes.

4. The ERA compliance monitoring and enforcement update

At the 23 October 2025 meeting, the ERA presented a Compliance Monitoring and Enforcement Update. The Chair requested that the ERA continue providing regular updates, with the next one to be delivered at the following meeting.

As the ERA provided an update in October 2025, this update covers the period since that meeting. It reflects the most current information available at the time of preparation and accounts for the lead time required to finalise papers for the GAB.

5. Attachments

- (1) ERA compliance monitoring and enforcement process update



Economic Regulation Authority
WESTERN AUSTRALIA

ERA GSI compliance update

Gas Advisory Board

5 March 2026

GSI Rules - breach allegations received

6

1 October 2025 – 15 February 2026

Reported breach categories

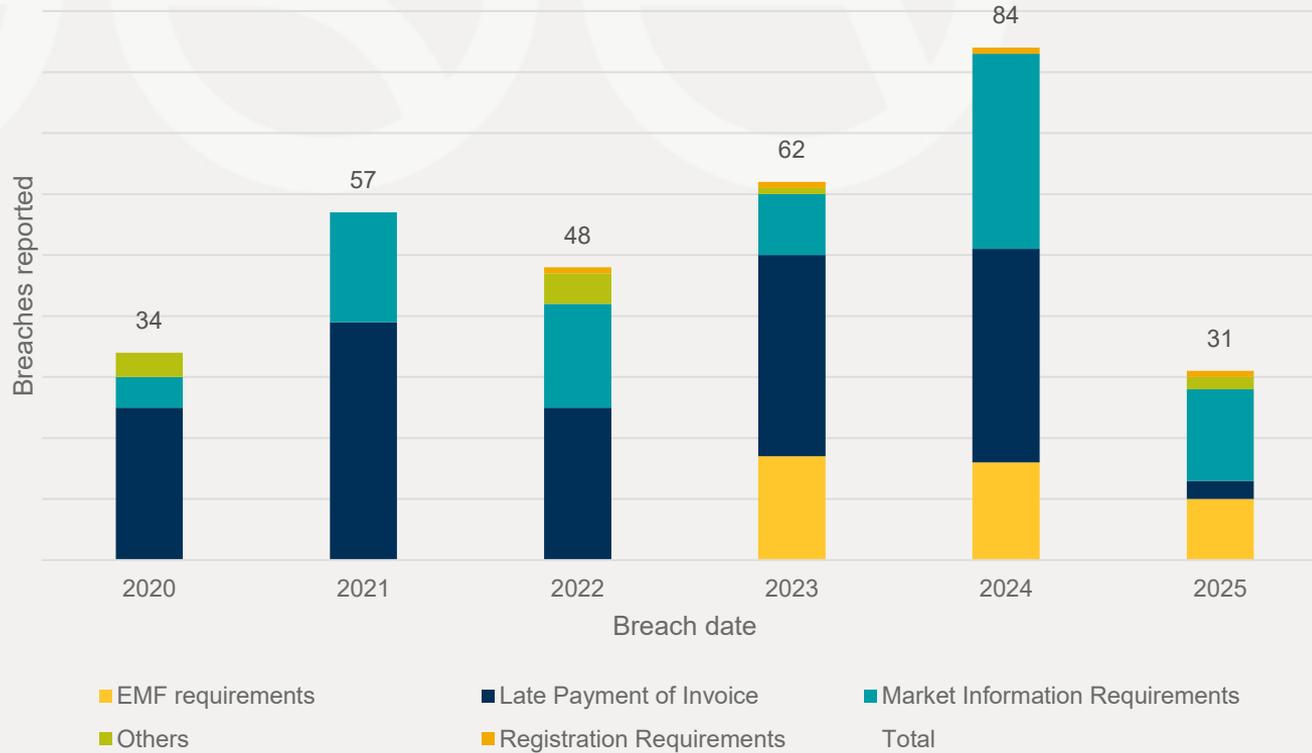
• 2025 EMF test	10
• GBB Reporting	6
• Registration requirements	1
• Late payment of invoices	3
• Contact information provision	1
Total	21

Reported by

• AEMO (participants breaches)	15
• ERA	1
• Self-reported AEMO	3
• Self-reported by participants	2

GSI alleged breaches - reporting trends

7



GSI investigations

1 October 2025 – 15 February 2026

Closed breach allegations

• Late payment of invoices	46
• GSOO information	17
• GBB contact details	4
Total	67

In progress

• EMF 2023, 2024 & 2025	43
• Registration requirements	1
• GBB Reporting	2
Total	46

Remaining backlog

• Late payment of invoice	3
• Registration requirements	2
• Information provision	11
• Other	5
Total	21



Agenda Item 5: Review of the Gas Services Information (GSI) Rules - Project Update

Gas Advisory Board (GAB) Meeting 2026_03_05

1. Purpose

The GAB Secretariat to:

- update the GAB on submissions received in response to the Review of the GSI Rules Consultation Paper (“Consultation Paper”) and seek the GAB’s view on key issues raised; and
- outline Energy Policy WA’s proposed plan and timeframes for the next stages of the Review of the GSI Rules.

2. Recommendation

That the GAB notes:

- the information provided in the GAB Presentation Slides (**Attachment 1**); and
- provide any feedback on key issues raised in the responses to the Consultation Paper.

3. Update on the Review of the GSI Rules

Background

The Coordinator of Energy (Coordinator), in consultation with the GAB, is carrying out a review of the GSI Rules (the Review).

The purpose of the Review is to identify and implement changes to evolve and enhance the GSI Rules.

There are two key drivers for the Review:

1. [The Inquiry into the WA Domestic Gas Policy](#) (the Inquiry), including:
 - the four Inquiry recommendations relating to the provision of data and broadening the scope of the Gas Statement of Opportunities, which were supported by the WA Government; and
 - other amendments or clarifications to the GSI Rules necessary to meet the policy intent of the GSI Rules; and
2. National Gas Law reforms and changes to the National Gas Rules as they may apply in WA, in particular those addressing information standards and transparency.

The review also considered any other aspects of the GSI Rules that may require clarification or amendment in order to improve the quality and transparency of information in the WA gas sector.

Initial stages of the Review included:

1. Assessing the existing framework;
2. Development of proposed outcomes; and

3. Developing and publishing a Consultation Paper with proposed review outcomes.

Stakeholder engagement

In March 2025, the GAB established the GSI Rules Review Working Group (GSIRRWG) to support the Review. The GSIRRWG met on three occasions (in August and September 2025) to discuss the GSI Rules and provide input on identified issues and proposed outcomes.

The Terms of Reference, papers and minutes of the GSIRRWG meeting are available on the working group [webpage](#).

At the 23 October 2025 meeting of the GAB, members discussed proposed outcomes from the initial stages of the Review. A draft Consultation Paper was shared with the GAB out of session. Views of the GAB expressed at the 23 October meeting and out-of-session were taken into consideration in drafting the final Consultation Paper.

On 15 December 2025, EPWA published the Consultation Paper. The due date for submissions on the Consultation Paper was 9 February 2026.

EPWA received a total of [six public submissions](#), together with one confidential submission. Public submissions were received from:

- AEMO
- Alinta Energy
- APA Group
- Australian Energy Producers
- AGIG
- Shell Energy

EPWA has prepared a high-level summary of the submissions and has identified some key areas for discussion by the GAB. This information is provided in Attachment 1.

The Consultation Paper noted that any enhancements to the GBB will be subject to further assessment by AEMO in collaboration with EPWA regarding cost impact, required effort and practicality to assist EPWA in developing an informed position and ensuring benefits outweigh costs before implementation of the changes. This work will be carried out in March and April 2026.

Further information on the Review of the GSI Rules, including the Scope of Work and Consultation Paper are available on the [Review webpage](#).

4. Next steps

Activity	Timing
Develop Information Paper outlining the review outcomes, together with an Exposure Draft of GSI Amending Rules.	March/April 2026
Publish Information Paper together with Exposure Draft of GSI Amending Rules	April 2026
GSI Amending Rules submitted to Minister for Energy for approval	Early June 2026

5. Attachments

(1) 5 March 2026 GAB Presentation slides



Department of
Energy and Economic
Diversification

Energy Policy WA

Gas Advisory Board

Update on the Review of the Gas Services Information (GSI) Rules

5 March 2026

Working together for a
brighter energy future.

Agenda

No.	Item	Duration
1	Summary of submissions	10 min
2	Summary of key issues in submissions for discussion	45 min
3	Project timeline and next steps	5 min

Purpose of this session

Energy Policy WA has consulted on a set of proposed Review outcomes aimed at evolving and enhancing the Gas Services Information (GSI) Rules.

This presentation provides a high-level summary of the public submissions in response to the GSI Rules Review Consultation paper. The GAB members are asked to provide feedback on key issues raised in these responses.

Overall summary of feedback

Submissions received: 7

Submitters: AEMO, Alinta Energy, APA, Australian Energy Producers, AGIG, Shell Energy and one confidential submission

Key messages:

- Submitters were generally supportive of the intent to evolve and enhance the GSI Rules but noted that any enhancement to market transparency must be balanced against considerations of confidentiality and commercially sensitive information to ensure that the proposed changes deliver the intended benefit.

Submissions raised issues related to:

- Reliability of forecasting
- Confidentiality concerns
- Complexity of implementation
- Cost to market participants
- Timing of implementation
- The need for certain proposed review outcomes

Proposed Outcomes: 1 – Extending the GSOO forecast period; 2 – Include decarbonisation pathways in the GSOO; 9 – Include gas related WEM data; and 12 – ‘Other gases’ review trigger event, received the most comments.

- Stakeholders were broadly supportive of Proposed Outcomes 1 and 2 but raised concerns related to modelling methods and accuracy of future forecasts.
- Some stakeholders identified potential confidentiality concerns related to Proposal 9
- Some stakeholders noted that Proposed Outcome 12 may be unnecessary at this stage, although there were mixed views on this.

Overall summary of feedback

To note: When stakeholder views were explicitly stated in submissions, they've been classified as *Support*, *Partial Support* (support with suggested improvements or caveats), or *Opposed*. When views were not stated explicitly, were unclear, or a proposal was not commented on, they have been classified as *No Position*.

Proposal	Support	Partial Support	Opposed	No Position
1. Extend the GSOO forecast	1	2	2	2
2. Decarbonisation pathways in the GSOO	1	2	2	2
3. Definition of Nameplate Capacity	2	1	-	4
4. Definition of Capacity Outlook	1	-	1	5
5. Improve Capacity Outlook reporting	1	-	-	6
6. Medium Term Capacity Outlook Definition	3	-	-	4
7. Remove LCA Flag for Storage Facilities	1	-	1	5
8. Clarify GBB Zone reporting incl. net consumption	1	-	-	6
9. Include gas related WEM data on the GBB	1	2	-	4
10. Principles for Information Standards	1	1	-	5
11. Duty of confidence clause	1	-	-	6
12. 'Other gases' review trigger event	1	2	1	3
13. Public register of investigations	2	-	-	5
14. Increase awareness of domestic gas reporting obligations	1	2	-	4

2. Discussion: Summary of key issues in submissions for selected proposals

Formalising improvements to the GSOO

Proposal 1: Extend the GSOO forecast period

Amend the GSI Rules to extend the minimum forecast period for the GSOO from “at least 10 years” to 20 years

Objective: To assist market participants in making decisions about investment and increase transparency around the forecast supply/demand balance. Specifying this requirement in the GSI Rules formalises changes AEMO has already begun implementing.

Stakeholder feedback:

- Include 20-year forecasts of gas capacity and demand but exclude gas infrastructure adequacy as stated in the Consultation Paper.
- 20-year forecast period yields less accurate predictions with highly variable data with potential for inaccurate future supply and demand forecasts which could negatively impact future policy decisions.
- The supply information should not be based on prospective resource data.
- Further and more detailed consideration of the reliability and evidentiary basis of a 20-year forecast is required.
- Recommend AEMO carefully considers a wide range of plausible scenarios and explicitly state the increased uncertainty associated with extending the forecast.

Question: Do GAB members have any additional feedback or comments on the matters raised by stakeholders?

Formalising improvements to the GSOO

Proposal 2: Include decarbonisation pathways in the GSOO

Amend the requirements for the GSOO to also include decarbonisation pathways

Objective: Including more information about the relationship between gas and electricity supply and demand in the GSOO will benefit the market by increasing participants' understanding of usage patterns and changing behaviours, helping to inform their decarbonisation efforts.

Stakeholder feedback:

- The modelling framework for decarbonisation pathways must avoid structural or assumption-based biases, should adopt a technology neutral structure, incorporate multiple credible scenarios and sensitivities, and provide transparent disclosure of assumptions and modelling logic.
- 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.
- 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.
- Recommend AEMO apply the WA Hydrogen and biomethane forecast presented in ACIL Allen's [Gas, liquid fuel, coal and renewable gas projections report](#).

Question: Do GAB members have any additional feedback or comments on the matters raised by stakeholders?

Improving definitions

Proposal 3: Amend the definition of Nameplate Capacity

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.

Objective: To provide clearer guidance on how Nameplate Capacity should be reported, by ensuring that it reflects any permanent changes to a facility's physical capability, and to support more accurate and consistent reporting across the industry.

Stakeholder feedback:

- Frequency of reporting should not be overly onerous. Any updates to nameplate capacity should only be required for significant and permanent modifications to the operating limits of a production facility.
- Should be deemed to be the lower of the physical capacity of the facility and the volume of gas that can be supplied to it.
- **Question:** Do GAB members have any additional feedback or comments on the matters raised by stakeholders?

Improving definitions

Proposal 4: Amend the definition of Capacity Outlook

Amend the definition of Capacity Outlook to clarify that it is a short-term estimate of gas quantities expected to be injected, accounting for all relevant factors.

Objective : Provide a better reflection of what is likely to be utilised over a seven-day period, based on the relevant participant's understanding of capacity utilisation.

Stakeholder feedback:

- The existing definition (Nameplate Capacity – Facility Outages) allows participants to identify where supply limitations intersect with forecast demand, to highlight structural tightness in the market and potential shortfalls.
- Amending the definition towards an expected supply forecast removes the ability of participants to understand where supply limitations may exist because expected gas injections are often a function of demand expectations, broadly required to be in balance.
- Supply outlook considerations could be more appropriately addressed through the GSOO.

Proposal 6: Amend the definition of Medium Term Capacity Outlook (MTCO)

Amend the definition of the 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.

Objective: Aligning the MTCO with the actual capacity available at a facility (including capacity that will not be utilised) offers a clearer and more consistent representation of available capacity and addresses previous reporting inconsistencies.

Stakeholder feedback:

- Remove the exemption for Registered Production Facility operators with respect to making updates to the MTCO where there are material changes covered by the period of the seven-day Capacity Outlook (provided for under rule 72).

Question: Do GAB members have any additional feedback or comments on the matters raised by stakeholders?

Amendments to data reported on the GBB

Proposal 7: Remove Linepack capacity adequacy (LCA) Flags for Storage Facilities
Remove the obligation for Storage Facilities to provide LCA Flag, consistent with the treatment of a Production Facility.

Objective : To provide Facility Operators with a simpler reporting framework that more accurately reflects the physical capabilities of their Facilities.

Stakeholder feedback

- Although storage Facilities publish a daily Capacity Outlook, an LCA Flag serves a 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 LCA Flags for Storage Facilities may reduce transparency and limit the availability of clear, forward-looking information for market participants to plan their operations, particularly during times of system stress.

Question: Do GAB members have any additional feedback or comments on the matters raised by stakeholders?

Amendments to data reported on the GBB

Proposal 9: Include gas related WEM data

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

Objective : To enhance participants' understanding of market dynamics and the impact of GPG on gas supply and demand.

Stakeholder feedback

- Should be limited to information that is available on the WEM website. More granular operational details on the GBB risks creating a compliance burden and inadvertently revealing commercially sensitive information about individual generators, including dispatch patterns, fuel use behaviours and operational strategies.
- Consideration 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.
- Linepack information and peak-consumptions patterns need to be balanced against confidentiality concerns.
- Work required to understand the feasibility of reporting Linepack information in the way suggested in the Consultation Paper.
- 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.

Question: Do GAB members have any additional feedback or comments on the matters raised by stakeholders?

Improving consistency with information provisions in the National Gas Law and Rules

Proposal 10: Introducing principles for Information Standards

Introduce principles from the NGL and NGR information standards into the GSI Rules to ensure adequate accuracy of information.

Objective : To improve transparency and consistency by setting accuracy expectations for gas market data. A reasonableness test would further support effective compliance with information-provision requirements.

Stakeholder feedback

- The GSI Rules already provide a clear structure for participant obligations, data submission requirements and the treatment of information.
- 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.
- No objection to incorporating these principles provided they do not expand participant obligations.
- 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.

Question: Do GAB members have any additional feedback or comments on the matters raised by stakeholders?

Accommodating gases other than natural gas

Proposal 12: 'Other gases' review trigger event

Determine a trigger event to initiate a review of changes required to accommodate 'other gases' on the GBB and in the GSOO

Objective : To prepare the GSI framework for the integration of 'other gases', if or when necessary.

Stakeholder feedback

- One submitter noted that early consideration of 'other gases' within the GSI can support orderly market development as projects scale.

Other stakeholders raised the following points:

- 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.
- 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.
- East Coast GSOO – review trigger is when 'other gases' were incorporated into the NGL. Recommendation to introduce a similar trigger (expected in 2026)
- Defer introducing a trigger until there is a clearer indication of material volumes of 'other gases' entering the market, supported by objective criteria that can be assessed and applied by all stakeholders.

Question: Do GAB members have any additional feedback or comments on the matters raised by stakeholders?

Increasing awareness of domestic gas reporting obligations ²⁵

Proposal 14: Increasing awareness of domestic gas reporting obligations

A link to the WA Domestic Gas Statement should be included on the GBB once it has been published by DEED

Objective : To increase awareness of current reporting on domestic gas obligations and producers' performance against their obligations, and support better understanding of the WA gas market.

Stakeholder feedback

- The WADGS is fit for purpose. Integrating the existing WADGS as a link on the GBB would provide greater transparency and would support increasing awareness of the WADGS and domestic gas reporting obligations.
- The WADGS plays an important role in providing information on domestic gas supply and policy compliance. Adding a link on the GBB is a practical step towards raising awareness. It complements the current practice of reporting on the DEED website without imposing new obligations.
- Annual reporting of domestic gas sales delivers enhanced market transparency without placing an undue administrative burden on member companies.
- Not necessary to introduce complex change in this area, particularly with a review from the Department of Energy and Economic Diversification (DEED) to occur in 2026.
- No need for greater frequency of reporting.

Question: Do GAB members have any additional feedback or comments on the matters raised by stakeholders?

3. Next steps

Next Steps

- **March/April 2026** – EPWA and AEMO to discuss cost impact and required effort for certain proposals regarding incorporation of WEM/GPG data on the GBB/GSOO
- **March/April 2026** – Develop Information Paper outlining the review outcomes, together with an Exposure Draft of GSI Amending Rules.
- **April 2026** - Publish Information Paper together with Exposure Draft of GSI Amending Rules for stakeholder feedback.
- **Early June 2026** - GSI Amending Rules submitted to Minister for Energy for approval.