



9 February 2026

Energy Policy WA
Level 1
66 St Georges Terrace
Perth WA 6000

Lodged email: energymarkets@dmirs.wa.gov.au

Dear Energy Policy WA,

Dear EPWA,

RE: Gas Services Information Rules Review Consultation Paper

Shell Energy Australia Pty Ltd (Shell Energy) welcomes the opportunity to provide feedback to Energy Policy WA (EPWA) on the Consultation Paper for the Gas Services Information (GSI) Rules Review which includes several proposals intended to evolve and enhance the GSI Rules. We understand that EPWA will consider feedback from this consultation which will inform an information paper which will outline the final review outcomes and a public consultation of the draft GSI Amending Rules.

About Shell Energy in Australia

Shell Energy is Shell's renewables and energy solutions business in Australia, helping its customers to decarbonise and reduce their environmental footprint.

Shell Energy delivers business energy solutions and innovation across a portfolio of electricity, gas, environmental products and energy productivity for commercial and industrial customers, while our residential energy retailing business Powershop, acquired in 2022, serves households and small business customers in Australia.

As the second largest electricity provider to commercial and industrial businesses in Australia¹, Shell Energy offers integrated solutions and market-leading² customer satisfaction, built on industry expertise and personalised relationships. The company's generation assets include 662 megawatts of gas-fired peaking power stations in Western Australia and Queensland, supporting the transition to renewables, and the 120 megawatt Gangarri solar energy development in Queensland.

Shell Energy Australia Pty Ltd and its subsidiaries trade as Shell Energy, while Powershop Australia Pty Ltd trades as Powershop. Further information about Shell Energy and our operations can be found on our website [here](#).

¹By load, based on Shell Energy analysis of publicly available data.

² Utility Market Intelligence (UMI) survey of large commercial and industrial electricity customers of major electricity retailers, including ERM Power (now known as Shell Energy) by independent research company NTF Group in 2011-2021.

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General Comments

Shell Energy appreciates EPWA initiating this review, noting that it is driven by the [Inquiry into the WA Domestic Gas Policy](#) (the Inquiry) and by reforms to the National Gas Law and National Gas Rules – particularly those relating to information standards and transparency. Shell Energy participated in the Inquiry and provided input to several recommendations that informed this review, including Recommendation 15. We also contributed through our representative on the GSI Rules Review Working Group established by EPWA. We thank EPWA for the constructive engagement to date and encourage this level of collaboration to continue. Our feedback is provided below for consideration.

Proposal 4 – Amend the definition of Capacity Outlook

This change appears intended to address perceived discrepancies between nameplate capacity and actual daily production. The existing definition of this data source (nameplate capacity minus 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 toward 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.

We are concerned that redefining the Capacity Outlook to incorporate expected gas injection would set a precedent that risks the concept progressively shifting toward a supply outlook, with utilisation assumptions changing the original intent of the information requirement. We believe this presents two material issues. Firstly, gas supply cannot be reliably forecast in isolation from demand conditions on the day, particularly given the dynamic nature of the domestic gas market, including the influence of spot market transactions. Supply and demand must balance in real time, and utilisation outcomes are inherently variable. Secondly, the proposal raises concerns regarding the degree of accuracy that would be expected of such outlooks and the potential regulatory consequences if forecasts do not align with actual outcomes.

Shell Energy believes that this amendment would create a standard that would be difficult to meet in practice and over time could lead to increased expectations of regulatory enforcement, including pressure for producers to deliver declared volumes irrespective of changing market or operational conditions (outside of legitimate force majeure or planned interruption scenarios). Such outcome would represent a significant level of market intervention and uncertainty.

For these reasons, it is important that the concept remains clearly confined to a Capacity Outlook rather than evolving into a “supply outlook” by default, noting that supply outlook considerations could be more appropriately addressed through the Gas Statement of Opportunities, or other information provided by participants. Furthermore, a standalone supply outlook is provided in an aggregated form by Pipeline and Storage Facility Operator Forecast Flow submissions, which consider the forecast supply and demand of customers of the facility operators.

Proposal 6: Definition of Medium Term Capacity Outlook

Shell Energy supports the proposed amendment to the definition of Medium Term Capacity Outlook (MTCO), noting it is consistent and in alignment with the existing definition of Capacity Outlook. The proposed change will improve clarity and consistency by ensuring MTCO reflects the actual capacity a facility is capable of producing, including any changes to Nameplate Capacity and outages, rather than expected output influenced by daily operational or market conditions. We agree that the amendment is a more accurate and standardised approach which will give market participants a clearer picture of genuine medium-term capability, reduce inconsistent reporting practices, and enhance the overall transparency and reliability of information provided through the Gas Bulletin Board.



Proposal 12 – ‘Other gases’ review trigger event

Shell Energy does not support the proposal to trigger a review event for ‘Other gases’, particularly the potential trigger of *commercial volume* mentioned in the Consultation Paper. Given the stage of development for other gases is still in its infancy, we consider it more appropriate to initiate a review at a later point, when market participation, production profiles and associated data for other gases are more established rather than try to prescribe a trigger event.

Accordingly, we do not recommend 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 readily assessed and applied by all stakeholders.

Proposal 13 – Public register of investigations

Shell Energy supports the introduction of a public register of investigations, however, recommends the Economic Regulation Authority (ERA) adopt the same process as the Electricity System and Market rules (ESM Rules), where the identity of participants under investigation is confidential until a breach finding is made. The ERA website states the following in relation to the protection of identity included in the public register:

‘The contents of the public register of investigations meet the requirements of ESM Rule clause 2.13.49A. No information can be included that could identify a Rule Participant. The ERA can only publish limited information about its investigations and will not publish the relevant ESM Rules allegedly breached, the particulars of alleged breaches or any other identifiable information as inclusion of the clause number in the Rules may, in some cases, identify the entity being investigated. Similarly, the occasional removal of clause number where the entity can be identified would also point strongly to the entity being investigated.’

Proposal 14 – Increase awareness of domestic gas reporting obligations

Shell Energy believes the WA Domestic Gas Statement (WADGS) is currently fit for purpose and are supportive of integrating the existing WADGS as a link on the Gas Bulletin Board. This would provide greater transparency and would support increasing awareness of the WADGS and domestic gas reporting obligations. We do not believe there is a requirement to introduce complex change in this area, particularly with a review from the Department of Energy and Economic Diversification (DEED) to occur in 2026.

Conclusion

We welcome the opportunity to discuss our submission further. Please contact Tessa Liddelow at [REDACTED] for any queries regarding this submission.

Yours sincerely

Libby Hawker

General Manager – Regulatory Affairs & Compliance
[REDACTED]