



Minutes

Meeting Title:	Gas Advisory Board (GAB)
Date:	5 March 2026
Time:	1:30 – 3:00pm
Location:	Online, via TEAMS

Attendees	Class	Comment
Sally McMahon	Chair	
Katie McKenzie	Australian Energy Market Operator (AEMO)	Proxy for Amy Tait
Chris Alexander	Small-Use Customer appointed by the Minister	
Paul Power	Coordinator of Energy Representative	
Trent Leach	Pipeline Operators and Owners	Proxy for Rachael Smith
Ben Wu	Pipeline Operators and Owners	Proxy for Beck Mason
Previn Bhar	Gas Producers	
David Rafferty	Gas Producers	
Allan McDougall	Gas Shippers	
Richard Beverly	Gas Shippers	
Nicholas Whish	Gas Users	
Quentin Jeay	Gas Users	
Noel Ryan	Observer (appointed by the Minister)	
Ambre Hillier	The Economic Regulation Authority (ERA)	
Also, in attendance	From	Comment
Katya Grimston	ERA	Presenter for item 4
Dora Guzeleva	Energy Policy WA (EPWA)	GAB Secretariat
Sanna Pember	EPWA	GAB Secretariat
Sean McAvoy	EPWA	GAB Secretariat
Apologies	Class	Comment
Amy Tait	AEMO	
Rachel Smith	Pipeline Operators and Owners	
Beck Mason	Pipeline Operators and Owners	

1. WELCOME AND AGENDA

The Chair opened the meeting with an Acknowledgement of Country.

The Chair noted that she had no conflicts to declare and that advice the GAB provides to the Coordinator of Energy does not necessarily represent the views of the Chair.

She noted the Competition and Consumer Law obligations, inviting members to bring to her attention any issues should they arise.

2. MEETING APOLOGIES AND ATTENDANCE

The Chair noted the attendance and apologies as listed above.

The Chair welcomed the new GAB members and asked them and anyone attending as a proxy for the first time to introduce themselves.

Mr Wu, Mr Bhar and Ms Hillier provided a brief introduction.

3. ACTION ITEMS

The Chair noted that items 112 and 122, the ERA's compliance monitoring and enforcement update, will be addressed today under agenda item 4.

Ms Grimston noted that these updates used to be given annually, but recently they have been presented at every GAB meeting. She suggested returning to annual updates to avoid repeating the same information.

The Chair agreed that the Compliance and Enforcement update should be provided by the ERA to the GAB once a year.

4. ERA COMPLIANCE MONITORING AND ENFORCEMENT UPDATE

Ms Grimston presented 'Breach allegations received' (slide 6) and explained that:

- the update covers the period from October 2025 to mid-February 2026;
- during this period, the trend in GSI Rules breach allegations is consistent with what the ERA observed in early 2025;
- the ERA considers compliance with GSI Rules to be strong, supported by an internal analysis, showing that fewer than 0.5% of reports were submitted late; and
- the number of reported non-compliance events remains low, particularly when considered against the large volume of reports required across the market.

Ms Grimston presented 'Alleged breaches and reporting trends' (slide 7) and noted that:

- the figures in the 2025 column represent the full calendar year;
- non-compliances reported to the ERA are trending downward, particularly in the 'Late Payment of Invoice' category;
- this was identified as a key issue in 2025, prompting targeted compliance activities by the ERA focused on reporting requirements;
- current data suggests these efforts have been effective, with only three breaches reported compared with an average of around 40 in the previous years;
- most issues related to new participants' awareness of specific GSI Rules requirements, which appear to have been addressed following the ERA's compliance activities; and
- the ERA will continue to monitor trends and assess whether further intervention is needed.

Ms Grimston presented a new slide titled 'Self-reporting trends' and explained that:

- under the GSI Rules, participants are not required to self-report alleged breaches. As a result, only a small number of self-reported breaches have historically been received;
- in recent years, the number of self-reported breaches has increased, including reports from participants other than AEMO;
- in 2025, most self-reports were submitted in the second half of the year, coinciding with the ERA's completion of its compliance work on late payments of invoices and reporting requirements; and
- the ERA views this upward trend positively, as it likely indicates that participants are becoming more aware of their obligations.

Ms Grimston presented 'GSI investigations' (slide 8) and noted that:

- the ERA is currently focusing on Emergency Management Facility (EMF) requirements, with 18 incidents relating to the January 2023 EMF event;
- the Coordinator of Energy (Coordinator) is required to issue, at least annually, an EMF direction to AEMO for the purpose of testing, with the testing for the current year expected to commence shortly;
- during the 2024 and 2025 EMF tests, certain non-compliances were identified;
- the ERA received EMF test data from AEMO in October 2025 and is assessing this information;
- investigations into these matters are ongoing. A recurring issue identified across the investigations is that participant contact details are out of date;
- investigation timeframes vary depending on the legal requirements and complexity of each matter, making them inherently unpredictable. As a result, the ERA cannot comment on whether overall investigation durations are improving but is exploring ways to improve these timeframes;
- the ERA applies a risk-based approach when allocating resources to alleged breaches, with most GSI investigations currently assessed as low risk;
- that the ERA's risk-based approach is detailed in its Compliance Framework and Strategy, available on the ERA website; and
- the ERA intends to engage with Gas Market Participants to clarify what constitutes high-risk non-compliance, to support more effective resource allocation.

The Chair noted that including investigation outcomes would be valuable to better illustrate the end-to-end process.

Ms Grimston noted that outcomes of the GSI Rules investigations are published in the six-monthly Market Compliance Reports on the ERA's website.

The Chair invited members to provide feedback on additional information that would be useful to include in future ERA updates.

- Mr Bhar suggested that showing the number of breaches as a percentage of the overall market would help assess the materiality of the breach numbers.

ACTIONS:

The ERA is to provide the GAB members with:

- 1. its Compliance Framework and Strategy that outlines its compliance risk-based approach; and***
- 2. a link to its Market Compliance Reports that outline outcomes from the GSI Rules investigations.***

5. REVIEW OF THE GAS SERVICES INFORMATION RULES

Ms Guzeleva clarified that the presentation summarises submissions received in response to the Review of the GSI Rules Consultation Paper (“Consultation Paper”). She noted that the purpose of the presentation is to seek the GAB’s views and observations on the key issues raised by stakeholders, prior to EPWA finalising the information paper with the final review outcomes and proposed draft rule changes to implement those outcomes.

Ms Guzeleva presented ‘Overall summary of feedback’ (slide 4) and noted that:

- Proposal 1 and proposal 2, extending the GSOO forecast period and including decarbonisation pathways in the GSOO, warrant discussion due to the number of submissions received on these proposals.

Ms Guzeleva presented a summary table outlining stakeholder feedback on the proposals (slide 5).

Ms Pember presented ‘Formalising improvements to the Gas Statement of Opportunities (GSOO) – Extending the GSOO forecast period’ (slide 7).

- Mr McDougall:
 - sought to clarify the distinction between gas capacity and demand, and gas infrastructure adequacy in this context;
 - stated that his understanding was that capacity refers to gas production capacity, demand refers to the total consumptions of Large Users and gas infrastructure adequacy refers to the capability of pipelines to deliver gas to required locations; and
 - noted that given his understanding, gas infrastructure adequacy should be considered alongside supply and demand when forecasting gas capacity.

The Chair indicated that her understanding was that gas infrastructure adequacy assesses whether a gas pipeline will be capable of servicing demand at a specific location and point in time. In contrast, gas capacity considers whether there is sufficient available gas supply to meet forecast demand.

- Ms McKenzie confirmed this distinction, noting that AEMO has not conducted a 20-year forecast of gas infrastructure adequacy and that the past year was the first time AEMO worked more actively with the Australian Gas Infrastructure Group (AGIG) on the infrastructure adequacy assessment.
- Mr Jeay supported longer-duration GSOO forecasts but noted that AEMO has previously cited limited data beyond 2035 as a constraint to accuracy. He noted that any extension should include uncertainty bands and avoid overstating confidence in long-term projections.
- Mr McDougall noted that long-term forecasts typically assume steady future demand, while future supply is contingent on current developments, leading to recurring forecast shortfalls. These assumptions should be acknowledged to contextualise such outcomes.
- Mr Alexander noted that, while 20-year forecasts carry uncertainty, they remain valuable if presented with appropriate contextual information.
- Mr Wu queried if the same forecasting methodology would apply across the 0–10-year and 11-20-year horizon of the forecast, and how higher uncertainty in later years would be managed, including the use of scenario bands.
- Ms McKenzie:
 - advised that AEMO applies more stringent criteria to the near-term forecasts than to the outer years of the forecast; and
 - noted that AEMO has completed its first 20-year forecast for the 2025 GSOO and welcomes feedback or inputs on its methodology or any uplifts for future forecasts.

- Mr Wu added that the 20-year forecast would be valuable if the methodology is clearly defined and stakeholders remain mindful of underlying assumptions and uncertainties.

The Chair summarised that there was general support for incorporating longer-term forecasts, provided stakeholders understand the potential change in methodology to reflect the implicit uncertainty.

Ms Pember presented 'Formalising improvements to the GSOO – Including decarbonisation pathways in the GSOO' (slide 8).

- Mr Jeay noted that many of these factors already appear to be captured in the GSOO's high-and-low case scenarios. He asked what additional value or new insights AEMO expected this information to provide.
- Ms McKenzie responded that:
 - this proposal arose from Recommendation 17 from the [Inquiry into the WA Domestic Gas Policy: Final Report](#) and the State's decarbonisation targets;
 - the intent is for industry to understand potential pathways to achieving those targets; and
 - feedback from industry has helped shape the decarbonisation pathway efforts to this point and AEMO is looking to understand what members would like to see more from the GSOO.
- Mr Bhar noted that decarbonisation efforts by participants would be reflected in demand data provided by users and therefore in AEMO's demand forecasts.
- Ms McKenzie confirmed this noting that, in the GSOO, changes such as large users' switching from coal to gas would be captured, as would plans for electrification or hydrogen use. She highlighted that many proponents' decarbonisation plans are not yet sufficiently mature.

Ms Guzeleva noted that stakeholder feedback recommended the inclusion of additional relevant sensitivities, reflecting concerns that some technologies or sensitivities may not have been captured.

- Ms McKenzie confirmed that, in principle, additional sensitivities could be introduced to test the impact of specific aspects. She advised that the relevant AEMO team would be best placed to provide further clarification on this.

The Chair summarised that members supported the provision of decarbonisation related information, noting the importance of clear disclosure of methodologies and input assumptions, and emphasised that the pathways could be presented as guidance only.

Ms Pember presented 'Improving the definitions for Nameplate Capacity, Capacity Outlook and Medium-Term Capacity Outlook' (slide 9 and slide 10).

- Mr Whish supported amending the definitions, highlighting issues with current reporting where some facilities' capacities do not align with their actual operational capabilities.
- Mr Beverly agreed that amending the definitions to address existing reporting issues was appropriate. He noted the stakeholder feedback for Nameplate Capacity and the recommendation that it 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.
- Mr Rafferty noted that an engineering design metric does not account for feedstock constraints or variability. As such, nameplate capacity is only relevant where there is 100 per cent assured feedstock deliverability, which is not the case in practice.

Ms Guzeleva sought to clarify the intent of the proposed amended definitions, noting that the proposal aimed to clearly distinguish the purpose of each definition. She outlined that:

- Nameplate Capacity would reflect a facility's actual capability; and

- Capacity Outlook would reflect the gas expected to be injected by the facility over the forthcoming seven-day horizon.

In response to Mr Leach's concerns that the definitions need to avoid the same figures being reported, Ms Guzeleva explained that the proposals were intended to ensure that participants do not report the same figure for Nameplate Capacity and Capacity Outlook, with the latter being a short-term estimate of expected injection.

- Mr Rafferty supported the proposed definitions, noting that the Capacity Outlook and MTCO provide the most valuable and useful metrics, allowing participants to infer additional potential supply from the difference between expected injection and MTCO. Given this, he suggested removing the Nameplate Capacity definition for simplicity and to avoid any ambiguity.

Ms Guzeleva noted that, in the past, the number of different definitions has contributed to inconsistencies in how information is reported. She asked members if they supported removing Nameplate Capacity from the GSI Rules, as this represented a considerable change from the original proposal.

The Chair noted that the issue had originated from stakeholders reporting identical figures for Nameplate Capacity and Capacity Outlook, which was neither accurate nor consistent with the intent of the GSI Rules. She noted that members had previously recognised value in retaining Nameplate Capacity, as it can indicate the potential for increased injections over timeframes extending beyond 12 months, and invited further views.

- Mr Bhar stated that Nameplate Capacity remains a useful piece of information, particularly for larger facilities operating below full utilisation, noting that MTCO may reflect only a portion of available capacity.
- Mr Alexander was supportive of removing definitions if this would simplify the framework but deferred to members who use the Gas Bulletin Board (GBB) more frequently on this point.
- Mr Power advised that, from a hazard management perspective, retaining recorded Nameplate Capacity on the GBB is useful and expressed a preference for retaining the definition. He noted that Capacity Outlook is the most prominent metric for users on the GBB.
- Mr McDougall considered Nameplate Capacity to have limited usefulness but acknowledged the different views. He noted that improving the relevance and accuracy of MTCO was his primary concern.

The Chair concluded that there was general support for reducing reporting that provides limited value, while recognising that some members continue to see value in retaining the Nameplate Capacity definition.

Ms Pember presented 'Increasing awareness of domestic gas reporting obligations' (slide 15).

Ms Guzeleva noted that this proposal had arisen as a compromise because the GSI Rules Review Working Group had been unable to reach a consensus on the issue of reporting information related to the domestic market obligations (DMOs), including gas export data. She clarified that this specific proposal had not been consulted on with the working group, nor the GAB.

- Mr McDougall:
 - noted that the GBB is intended to increase transparency in the WA gas market and that the approach does not achieve this. He disputed claims by producers that they lack resources to report domestic gas supply more frequently; and
 - proposed that the GBB include a dedicated page detailing producers' DMOs, including what obligations apply and progress toward meeting them. He noted that he had not been aware of the WA Domestic Gas Statement (WADGS) before it was circulated to the Working Group.

The Chair asked Mr McDougall whether a dedicated page for domestic gas obligations information was preferable to linking to the WADGS only, noting concerns that stakeholders may not recognise the importance of the information.

- Mr McDougall noted that commitments to deliver domestic gas have been an ongoing issue for several years and that some Production Facilities have cited confidentiality issues around export data.
- Mr Alexander noted that one of the arguments against increased information reporting on DMOs was that gas users would be confused by the reporting. He disagreed with this claim, noting that more could be done to increase transparency than just including a link to the WADGS.
- Mr Whish agreed with Mr McDougall, noting that the WADGS is not readily interpretable by a layman.
- Mr Rafferty stated that he was comfortable with publishing information already provided to DEED on the GBB, noting concerns regarding reporting frequency only.

The Chair summarised that members agreed that the information would be included if it is considered useful to stakeholders.

Ms Guzeleva presented 'Amendments reported to the GBB – Removal of Linepack capacity adequacy (LCA) Flags for Storage Facilities' (slide 11).

- Mr Jeay stated that the LCA Flag is not relevant for Storage Facilities and that Capacity Outlook reporting should be consistent across Storage and Production Facilities.
- Mr Leach noted that, in its submission, AGIG supported transparency but noted that Linepack is a concept relevant to pipelines and not a suitable term for a Storage facility. He added that consideration is needed for whether this is a relevant indicator for a Storage Facility.
- Mr McDougall queried whether, to be usable, storage capacity could be defined as the volume between the minimum cushion gas requirement and the facility's maximum capacity, with the effective zero-point set at the minimum in-storage level rather than at the empty storage.
- Mr Leach noted that the determination of trigger points and how these are represented needed some consideration, but reiterated that Linepack was not the appropriate indicator.
- Mr Rafferty agreed that LCA Flags are only relevant during periods of supply shortages, during which parties would engage directly with facility owners.

Ms Guzeleva noted that there were two issues unaddressed in the meeting but considered sufficient feedback had been received.

The Chair advised members to provide any further feedback to the GAB secretariat out of session.

6. OVERVIEW OF RULE CHANGE PROPOSALS

Ms Guzeleva noted that there are currently no rule change proposals under consideration.

She noted that the timing of the publication of the draft GSI Rules arising from the Review of the Allowable Revenue Framework is subject to the ongoing national review of AEMO.

7. GENERAL BUSINESS

The meeting was closed at 3:00pm.

The next meeting is scheduled for 27 August 2026.