`Attachment B Stakeholder feedback template

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in this paper and any other issues that they would like to provide feedback on. The SCO strongly encourages stakeholders to use this template, so that it can have due regard to the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern.

Should stakeholders choose to provide additional feedback outside the template, they should reference the relevant question they are responding to.

1. Bulletin Board

Number	Questions	Feedback
1	Box 2.3 describes the purpose of the Bulletin Board. If the transparency measures outlined in this Consultation RIS are implemented, do you think that the purpose of the Bulletin Board should be further clarified (e.g. to capture both domestic and export oriented activities)? If yes/no please explain.	AEMO considers the purpose as proposed in NGR 145 to be adequate. To the extent that export oriented activities impact on domestic outcomes the purpose is broad enough to capture this.

2. ACCC recommendations on reserves and resources reporting framework

Number	Questions	Feedback
2	As noted in Table 3.3, the ACCC has recommended that annual movements in 2P reserves be reported. Do you think: (a) an additional category of 'pricing' should be included to capture reserve adjustments due to changes in gas price assumptions? (b) reserves upgrades and downgrades should be combined into a single category?	AEMO considers that reserve upgrades and downgrades should be separately reported as this will provide a greater level of transparency when reporting the aggregate change in the GSOO.

3	As noted in Table 3.3, the ACCC has recommended that reserves and resources be reported on a field level. How do you think the term ‘field’ should be defined for this purpose? For example, do you think it should be defined by reference to a permit, or is greater guidance on how tenures are to be grouped into a field assist? Alternatively, do you think there should be a standard or requirement for naming fields? Please explain your response to this question.	AEMO understands that there are multiple different reporting requirements between jurisdictions, including differences between onshore and offshore reporting. Permit holders could report by field, greater field, formation or permit and each option has different nuances that will need to be addressed. AEMO considers that further consultation may be required with regards to this question and notes that there may be some special conditions that could apply in certain circumstances. AEMO notes that the Rules allow for the BB Procedures to specify the manner and form of data submissions. AEMO considers the reporting of field could be defined in the BB procedures, accounting for a balance between the costs associated of developing systems regarding how much data is to be submitted relative to the use of that data and the benefit that it may provide. AEMO supports a standardised approach to the naming of fields but also appreciates this can result in inconsistencies between industry references to the field and the standardised name.

3. Gas, LNG and infrastructure prices

Number	Questions	Feedback
4	Do you agree with the information deficiencies that have been identified in Table 4.1? If you don’t agree please explain why. Are there other pricing related information deficiencies that you think are adversely affecting the gas markets in eastern and northern Australia?	AEMO has assumed this question is with regards to the deficiencies identified in Table 4.2. AEMO agrees with these deficiencies, for example prices struck/cleared through the various wholesale gas markets are only one indicator of the short-term value of gas. As identified in Table 4.2 there are a number of other indicators that could assist users in the contracting of gas.

		AEMO supports the reporting of production costs as an important input into GSA negotiation processes and investment decisions.
5	How significant an effect, do you think the information deficiencies identified in Table 4.1, are having on the gas markets in eastern and northern Australia and the broader economy?	AEMO considers that these deficiencies create a level of disparity between participants e.g. those participants with multiple longer-term contracts or multiple relationships are likely to be in a better position than a Large User renegotiating a single gas contract.
6	Do you agree that the information deficiencies for gas, LNG export and infrastructure prices could be viewed as a market failure that will warrant government intervention? If not, please explain why.	AEMO agrees that this could be viewed as a market failure and the market could be more efficient if this information was made available to all, the participants with the information do not have the incentive to voluntarily make that information public This could be considered a market failure and hence government intervention is required to address the market failure. AEMO supports the evolution of markets and recognises that market structures will change from time to time. AEMO views the lack of information on production costs as a significant deficiency in the market.
7	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	Teams within AEMO use the Bulletin Board extensively daily. The use of this information ranges from a market monitoring function through to operational impacts that may be highlighted through the Bulletin Board data.
8	Do you agree with the ACCC-GMRG's recommendations on how to address these information deficiencies, which would require the publication of the following (see section 3.3 for more detail)? ○ production cost estimates; ○ short-term GSA prices; ○ long-term GSA prices; ○ LNG netback prices; ○ LNG export prices; and ○ the standing prices and actual prices paid for compression and storage facilities. (a) If so, please explain how you would use this information and the net benefit it would provide. (b) If not, please explain why.	AEMO agrees that publishing a range of prices, as identified, could assist with market transparency to the extent that the information is manageable and digestible. AEMO notes that data needs to be obtained at the appropriate granularity to ensure standardised data can be reported on in order to remain cost effective. AEMO considers levels of aggregation will add complexity to reporting systems and will therefore increases costs. AEMO does not agree there is a need to aggregate short-term gas transactions and considers it will be sufficient to report these anonymously.

9	Do you agree with the options that have been identified in section 4.3, or are there other options that could be considered? If you think there are other options that could be considered, please explain what they are, what they would involve and what the advantages, disadvantages, costs, benefits and risks are with these additional options.	AEMO generally agrees with the options presented in section 4.3.
		
		AEMO views the following elements of the options to have a higher benefit to the market –
		
		• Production costs
		• The prices under short-term and longer-term GSAs, including gas swaps
		• LNG export and import prices
		
		AEMO has the following feedback with regards to the current drafting:
		Registration of field operators with a net revenue interest
		• AEMO considers the current drafting of the Rules with regards to field owners can be improved to minimise costs without impacting on transparency. As written the Rules contemplate that closely related entities may form a field owner group for their combined net revenue interest, but it does not allow a closely related entity who does not hold a net revenue interest in that Bulletin Board (BB) field to form part of that field owner group. This is likely to result in an unnecessarily high number of registrations to occur, creating an administrative burden for both participants and AEMO. AEMO's intent with the feedback it has provided and AEMO proposed drafting are
		  ○ To allow a single company to be registered as the responsible field owner for all interests in all fields held by closely related entities of that company.
		    ▪ Where that company doesn't have to have an interest in a gas field
		    ▪ only the company is required to register the grouped interests in all fields and register as the reporting entity.
		    ▪ the closely related entities with the interest in the field are exempt from registering the grouped interest or registering as a reporting entity, on the basis that a related company is registered to provide the information

		▪ that registered company is responsible for reporting for all interests in all fields held by closely related entities of that company ▪ when applying for registration, confirmation from all members authorising the company to be reporting entity must be provided to AEMO ▪ AEMO is not required to check that the company has access to all the information required to be reported ○ AEMO's preference is for this registration structure to be mandatory (although if a single company is a group won't have access to all the information, making this registration structure mandatory won't work) • Proposed drafting changes have been submitted within this response, noting that AEMO is open to other drafting options that result in a similar outcome. This would result in a reduction in the number of unnecessary registration activities significantly. • AEMO considers that any field owner should be able to appoint a closely related entity to register and report, and this closely related entity would take on the obligation as the reporting entity.
10	In relation to the options set out in section 4.3: (a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option? (b) What incremental benefits do you think are associated with options 2-4? (c) What incremental costs do market participants expect to incur under options 2-4? (d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1? (e) Do you agree with the proposed reporting frameworks for short-term GSAs, swaps and/or secondary trades of	Advantages of the information presented in each option is the added transparency that comes with the information. The BB has historically only required facility operators to submit data and there would be a cost to other participants in needing to submit data (Option 3) e.g. where there has been a short-term gas transaction. AEMO supports the concept of transaction reporting agent. AEMO consider that the Swaps under Option 4 should be included if Option 3 is adopted, given Swaps can be used as a short-term gas transaction. To date there have been two secondary capacity trades submitted to the BB (as required from 1 March 2019) and AEMO is not aware of any capacity trades occurring on a secondary capacity trading platform owned by a participant. Further

	storage capacity? If not, please explain what you think should change and why.	analysis may be required with the additional information being requested in Option 4 as to the quantity, and usefulness, of information this may be with regards to secondary trades of storage capacity. Compliance monitoring of this could be difficult. AEMO considers there to be an implementation risk should there be changes to the Rules late in the process. Ideally, Procedures would be consulted on in parallel to the Rules being made to allow for more time for system development. AEMO also notes that the granularity of data collected, the level of aggregation, and systems used will all have an impact on cost. Consideration will need to be given to ensure the information is published in a manner that is manageable and digestible.
11	If you think the transparency measures set out in section 4.3 should be implemented through alternative means, please explain how you envisage this would work.	AEMO considers the use of the Bulletin Board to collect and publish this information to be appropriate. This ensures information is collected into a central location. AEMO supports a staggered approach to implementation and is not proposing any changes to the current BB Map.

4. Supply and availability of gas

Number	Questions	Feedback
12	Do you agree with the information deficiencies that have been identified in Table 5.1? If you don't agree with the information deficiencies that have been identified, please explain why. Are there other gas supply and availability related information deficiencies that you think are adversely affecting the gas markets in eastern and northern Australia?	AEMO agrees with the information deficiencies in Table 5.1. This information would support AEMO in its publication of the GSOO.
13	How significant an effect do you think the information deficiencies identified in Table 5.1 are having on the gas markets in eastern and northern Australia and the broader economy?	AEMO considers the publication of the GSOO as a key report into understanding the gas supply outlook. Ensuring the GSOO has the best available information will

Number	Questions	Feedback
		result in high quality information being disseminated to government and the industry.
14	Do you agree that the information deficiencies regarding the supply and availability of gas could be viewed as a market failure that will warrant government intervention? If not, please explain why.	AEMO agrees that this could be viewed as a market failure and the market could be more efficient if this information was made available to all, the participants with the information do not have the incentive to voluntarily make that information public This could be considered a market failure and hence government intervention is required to address the market failure. AEMO supports the evolution of markets and recognises that market structures will change from time to time.
15	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	
16	Do you agree with the AEMC's and ACCC-GMRG's recommendations on how to address these information deficiencies, which would require the publication of the following (see sections 3.1 and 3.3 for more detail)? ○ 1P, 2P, 3P reserves, 1C and 2C contingent resources; ○ Links to public information on exploration activities; ○ Drilling activities; ○ Volume of gas contracted under existing GSAs; and ○ LNG import volume and operational information. (a) If so, please explain how you would use this information and the net benefit it would provide. (b) If not, please explain why.	**GSOO** AEMO agrees that having as complete a picture as possible being incorporated into the GSOO modelling can result in a more accurate forecast. **Registration** AEMO considers that registration of all field operators, as drafted, may create an unnecessary burden (as previously noted). The ability to stagger registrations and implement registrations early would be beneficial to avoid many new registrations occurring at the same time. As currently drafted, the Rules would require a significant number of registrations to occur, increasing the cost to AEMO and participants. **Submissions and Reports** If all recommendations are implemented, AEMO considers that a staggered approach for the delivery of this to be the best option.
17	Do you agree with the options that have been identified in section 5.3, or are there other options that could be considered? If you think there are other options that could be considered, please explain what the options are, what they would involve and what	AEMO generally agrees with each of the options identified in section 5.3. AEMO is supportive of the additional information regarding reserves and resources that can then be incorporated into the GSOO. AEMO notes that consideration needs to be given to the granularity and complexity of the data that may be collected to ensure that costs are minimised, and data integrity is maintained.

Number	Questions	Feedback
	the advantages, disadvantages, costs, benefits and risks are with these additional options.	
18	In relation to the options set out in section 5.3: (a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option? (b) What incremental benefits do you think are associated with options 2-4? (c) What incremental costs do holders of gas reserves and resources, LNG import and LNG export facilities expect to incur under options 2-4? (d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1?	AEMO considers the advantage in moving forward with each of the options as proposed can result in a more accurate GSOO, providing more informed guidance to governments and industry. The cost of running the Bulletin Board has increased and this would further increase that cost. As stated earlier, reviewing the registration requirements is necessary to ensure administrative burden/cost is minimised. AEMO considers there to be an implementation risk should there be changes to the Rules late in the process. Ideally, Procedures would be consulted on in parallel to the Rules being made to allow for more time for system development. If the data being collected is open to interpretation, complex in nature, or subject to "free text" fields (as examples) AEMO notes this could compromise the ability for users of the data to make use of this information.
19	If you think the transparency measures set out in section 5.3 should be implemented through alternative means, please explain how you envisage this would work.	

5. Demand for gas

Number	Questions	Feedback
20	Do you agree with the reporting information inconsistencies that have been identified in section 6.1? If you do not agree, please explain why. Are there other demand related information deficiencies that are adversely affecting the gas markets in eastern and northern Australia?	AEMO notes that much of this information is available on the BB, following the implementation of the BB Rule change in September 2018. AEMO considers that short and medium-term outlooks could be beneficial to the market.
21	How significant an effect do you think the demand related information deficiencies are having on the gas markets in eastern and northern Australia and the broader economy?	A majority of this information has been available on the BB from 30 September 2018, with connection point Name Plate ratings being implemented from 1 February 2019. Distribution connected large users are not currently on the BB and would be captured by the current drafting of the Rules.
22	Do you agree that the information deficiencies identified in the demand for gas could be viewed as a market failure that will warrant government intervention? If not, please explain why.	AEMO does not consider this to be a market failure and views the demand data as being generally available.
23	To what extent have you been using the existing information regarding LNG exporters' demand-supply balance as published in the ACCC Gas Inquiry?	
24	Do you agree with the AEMC's and ACCC-GMRG's recommendations on how to address these information deficiencies, which would require the publication of the following (see sections 3.1 and 3.3 for more detail)? ○ Large users' information on nameplate capacity and daily actual gas consumption; ○ LNG export facility operational information; and ○ LNG export facility shipment information. (a) If so, please explain how you would use this information and the net benefit it would provide. (b) If not, please explain why.	**Large Users** The actual flow data for Large Users (including GPG) that are transmission connected is already available on the GBB. AEMO understands that Large Users connected to the distribution network are in scope of these changes and this information is not currently captured on the BB. AEMO considers that it would be more appropriate for Large User information (flow and capacity outlooks) to be submitted by the connected pipeline (transmission or distribution). AEMO notes that this would result in distribution network operators being required to register on the BB. This would result in a lower number of registrations and participants that AEMO is required to interact with and considers this would result in a more efficient outcome. AEMO understands that outage coordination and notification is likely to exist in Gas Transportation Agreements and therefore the capacity outlook information is likely to be obtained by pipeline operators. AEMO recognises that capacity outlook information can be valuable and considers this

Number	Questions	Feedback
		information, and flow information, should be supplied from transmission and distribution pipeline operators. AEMO also notes that the current drafting excludes large users from providing short and medium-capacity outlooks. To the extent this capacity information is not being provided to AEMO further strengthens the argument that flow data and nameplate information should be provided by pipeline operators.
25	Do you agree that requiring large users, LNG facility operators and LNG export facilities to report the information set out in section 6.3 will benefit market participants? (a) If so, please explain how you would use this information and the benefit it would provide. (b) If not, please explain why.	**Large Users** • The current wording would capture distribution connected Large Users, as these are indirectly connected to BB facilities. If Large Users are to be captured by the BB it does seem appropriate to capture all Large Users (given the impact these can have on the STTM within a distribution network). • While there is an exemption available for Large Users to provide data, they are still required to register. Given the information is likely to be held by the pipeline operator AEMO considers this information could be requested from the pipeline operator, minimising the impact on Large Users. It would mean that Large Users within a distribution network are still impacted, though there may be other means of collecting this information e.g. through Shipper registration or via the distribution network providers. AEMO estimates there is between 50 and 100 Large Users, and this would be a significant administrative burden, and cost, for AEMO and Large Users. • The requirement for Large Users to provide actual flows the following day may not be achievable for those that do not have an exemption as they may not meter the data themselves and may rely on the meter data being provided by the distributor or pipeline. AEMO considers that this information should be provided by transmission and distribution pipeline operators. Reporting on short and medium-term capacity outlooks could be beneficial for planning, and AEMO considers this information could also be obtained from pipeline operators. This would reduce the costs and ensure the number of BB participants are minimised to those participants that are regularly reporting on the BB.

Number	Questions	Feedback
26	Do you agree with the list of information that large users, LNG facility operators and LNG export facilities would be required to report (e.g. do you agree that LNG facility operators should be required to report on the volume of LNG in storage facilities)? (a) If so, please explain how you would use this information and the net benefit it would provide. (b) If not, please explain why.	AEMO considers that a greater level of consistency may be required to ensure a level playing field noting that much of this information can be extracted from the BB currently.
27	Do you think that Northern Territory LNG facilities should be included or exempt from reporting the proposed operational and shipment information? Please explain your view.	Where LNG facilities directly interact with the domestic market, AEMO considers a greater level of transparency is required.
28	Do you have any suggestions for alternative/additional information that would improve demand side information on the Bulletin Board? If so, please explain your suggestions.	
29	In relation to the LNG export information: (a) Are there any reasons why LNG exporters should not be required to report on exports to AEMO for publication on the Bulletin Board? If so, please explain why. (b) Are there any constraints on the ability of LNG exporters to report this information to AEMO? If so, please explain what the constraints are. (c) Do you agree the 20 business day lag is required to address potential concerns about the publication of LNG export information and if so, is this measure effective? If not, what would address those concerns?	

Number	Questions	Feedback
30	Do you agree with the options that have been identified in section 6.3, or are there other options that could be considered? If you think there are other options that could be considered, please explain what the options are, what they would involve and what the advantages, disadvantages, costs, benefits and risks are with these additional options.	AEMO considers that Large User information could be provided by other means e.g. Shippers/Pipeline Operators/Distribution Network Providers which would lower the administrative burden/cost on Large Users and AEMO. With the implementation of the changes that went into the BB on 30 September 2018 (i.e. lowering the threshold to 10TJ/d) this resulted in a large increase in the number of registrations, many receiving data exemptions as this data was already being reported. From AEMO's experience many of these new users are less familiar with the BB processes resulting in higher than average costs for AEMO in the registration process. Many of these new users also would have had to implement additional processes, some beyond the scope of their existing operations as a result of the 7 day a week reporting requirements. AEMO considers that, to the extent practicable, obligations should be placed on those users (i.e. pipeline operators) with potential access to enough information to satisfy the requirements of the changes. This will significantly minimise costs.
31	In relation to the options set out in section 6.3: (a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option? (b) What incremental benefits do you think are associated with options 2-4? (c) What incremental costs do LNG exporters, LNG facility operators and large users expect to incur under options 2-4 in section 6.3? (d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1?	As currently drafted, there could be a significant cost on Large Users to register and implement processes for providing data to the BB. AEMO considers that further refinements should be made given the information that has become available on the BB in the past 12 months. The Rules should be refined to place the obligation on pipeline operators to collect and submit this information on behalf of Large users. Pipeline operators are likely to have much of this information, including capacity outlook information given the usefulness of this information in coordinating maintenance windows. AEMO notes that option 2 assumes AEMO will be required to aggregate large users' gas use data to provide an overview of different types of demand but this is not included in the proposed drafting for the provision to collect this information in the detailed facility information. AEMO considers there to be an implementation risk should there be changes to the Rules late in the process. Ideally, Procedures would be consulted on in parallel to the Rules being made to allow for more time for system development. AEMO also considers the significant number of registrations that may be required will cause an unnecessary burden on AEMO.

Number	Questions	Feedback
32	If you think the transparency measures set out in section 6.3 should be implemented through alternative means, please explain how you envisage this would work and how this would contribute to the NGO and the Energy Council's Vision as set out in Box 1.1.	As stated throughout this section, AEMO considers that information relating to Large Users would be more appropriately sourced from pipeline operators. There are a number of benefits to this approach, and costs that can be avoided. Benefits include • Single points of contact • Coordination of outages • More efficient use of AEMO's resources (removing the need to deal with multiple BB users who may be inexperienced in interacting with the BB) • Consistency of information • Ability to provide the information. As currently drafted, large users will likely need a delay of up to 1 week to provide this information as it may not be readily available. Costs that could be avoided • One-off registration costs would be reduced for AEMO and users. • Ongoing AEMO support would be reduced as a result of minimising the number of users that are less familiar with AEMO's systems and processes • Operational costs for users will be minimised i.e. one pipeline operator may be able to submit many large users' data relative to many large users' putting on additional resources to meet these regulatory requirements

6. Infrastructure used to supply gas to end-markets

Number	Questions	Feedback
33	Do you agree with the information deficiencies that have been identified in section 7.1? If you don't agree with the information deficiencies that have been identified, please explain why? Are there other infrastructure related information deficiencies that you think are adversely affecting the gas markets in eastern and northern Australia?	AEMO agrees with the information deficiencies in Table 7.1 AEMO's role in providing an accurate GSOO is determined by having relevant and up-to-date information.

Number	Questions	Feedback
34	How significant an effect do you think the infrastructure related information deficiencies are having on the gas markets in eastern and northern Australia and the broader economy?	
35	Do you agree that the information deficiencies regarding infrastructure used to supply gas to end-markets could be viewed as a market failure that will warrant government intervention? If not, please explain why.	AEMO agrees that this could be viewed as a market failure and the market could be more efficient if this information was made available to all, the participants with the information do not have the incentive to voluntarily make that information public This is a market failure and hence government intervention is required to address the market failure
36	Do you agree with the AEMC's and ACCC-GMRG's recommendations on how to address these information deficiencies, which would require the publication of the following (see sections 3.1 and 3.3 for more detail)? ○ Proposed and committed infrastructure developments; ○ 36-month uncontracted capacity outlook for storage and stand-alone compression facilities, and production facilities providing third party access; ○ Stand-alone compression facilities to report operational information; and ○ A list of users with contracted capacity under storage and stand-alone compression facilities. (a) If so, please explain how you would use this information and the net benefit it would provide. (b) If not, please explain why.	AEMO agrees much of this information would assist in the modelling and publication of the GSOO. AEMO notes that data needs to be obtained at the appropriate granularity to ensure standardised data can be reported on in order to remain cost effective. AEMO considers levels of aggregation will add complexity to reporting systems and will therefore increases costs. To the extent that the information is manageable and digestible will ensure a greater level of market transparency is achieved.
37	Do you agree that requiring project proponents to provide the proposed information on gas infrastructure developments will	AEMO considers this information will enable the GSOO to provide a more accurate forecast, which could be the difference between flagging a shortfall due to lack of industry action and noting that there might be a shortfall, but projects A, B and C are already progressing that will benefit the situation.

Number	Questions	Feedback
	deliver an overall net benefit to gas market participants and policymakers? (a) If so, please explain how you would use this information and the net benefit it would provide. (b) If not, please explain why.	The more accurate information AEMO has, the better guidance it can provide to governments and the industry in general as to where the gaps really are.
38	Do you agree that the requirement for entities to provide information on gas infrastructure developments should cover both ‘proposed’ and ‘committed’ developments set out in section 7.3? If not, please explain why.	AEMO believes that ‘proposed’ and ‘committed’ developments should be included in infrastructure development.
39	Do you agree the rules requiring compression service facilities registered under Part 24 to provide operational information should extend to all stand-alone compression facilities that meet the reporting threshold? If not, please explain why.	
40	Do you agree the rules requiring compression service facilities registered under Part 24 to provide operational information should extend to all stand-alone compression facilities that meet the reporting threshold? If not, please explain why.	
41	Do you agree with the categories of information to be reported by compression service facilities set out in section 7.3? If not, please explain why.	
42	Do you agree the proposed extension of the time-frame for uncontracted capacity outlooks from 12 to 36 months will deliver an overall net benefit to gas market participants?	AEMO does not consider the extension from 12 to 36 months as a major change to the IT systems and supports the greater level of transparency this information could provide.

Number	Questions	Feedback
	(a) If so, please explain how you would use this information and the net benefit it would provide. (b) If not, please explain why.	
43	Do you see value in extending the information requirement for a 36-month uncontracted capacity outlook to production facility operators that are providing third party access? (a) If so, please explain how you would use this information and the net benefit it would provide.	AEMO considers extending the information requirement for a 36-month uncontracted capacity outlook to production facility operators would ensure consistency within the rules, and production information is likely to be a more meaningful signal of available supply. AEMO notes that the Information about BB Shippers with primary production capacity has not been included in the drafting and questions whether this is an oversight.
44	Do you agree that requiring Bulletin Board compression facilities and Bulletin Board storage facilities to provide a list of users with contracted capacity for publication on the Bulletin Board will deliver an overall net benefit to gas market participants?	AEMO considers this information will provide a greater level of transparency for BB users.
45	Do you agree that the materiality threshold should be changed? If not, please explain why.	AEMO agrees with this change, and views the current definition as being deficient. A change of nomination or capacity outlook on a large facility can significantly impact on the various wholesale gas markets, but as currently written does not have to be updated based on the higher threshold of 10% of name plate capacity. To the extent that this has an adverse reporting impact on small users AEMO proposes that this could be further enhanced by putting a minimum threshold for changes along the lines of the following formula Maximum of A and B Where A is the Minimum of 30 TJ and 10 % Nameplate capacity And B is 5TJ (as an example).

Number	Questions	Feedback
46	Do you agree with the options that have been identified in section 7.3, or are there other options that could be considered? If you think there are other options that could be considered, please explain what the options are, what they would involve and what the advantages, disadvantages, costs, benefits and risks are with these additional options.	It appears to be an oversight that information regarding BB shippers with primary production capacity is not included. This information could be beneficial for users when seeking to purchase gas.
47	In relation to the options set out in section 7.3: (a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option? (b) What incremental benefits do you think are associated with options 2-4? (c) What incremental costs do entities developing new gas infrastructure, operators of storage and stand-alone compression facilities, and facilities with a capacity of 10-30TJ/day expect to incur under options 2-4 in section 7.3? (d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1?	AEMO considers the change to the materiality threshold will provide a benefit and will provide a greater level of transparency to the market. AEMO is supportive of information that will further enhance the GSOO. There is a cost associated with the collection of this information and AEMO would propose to simplify and standardise the reporting to the extent possible. Further analysis will need to be conducted to understand the full costs associated with the changes e.g. potential changes to the GSOO collection of information through surveys relative to information that will now be collected through the BB.
48	If you think the transparency measures set out in section 7.3 should be implemented through alternative means, please explain how you envisage this would work and how this would contribute to the NGO and the Energy Council's Vision as set out in Box 1.1.	

7. Gas Statement of Opportunities (GSOO)

Number	Questions	Feedback
49	Do you agree that the GSOO should be expanded to include the Northern Territory now it is connected to the eastern and northern Australian gas markets? If not, please explain why.	AEMO agrees that the Northern Territory should be included in the GSOO given the ability of the NT to provide gas to the broader east and south-east gas markets. The GSOO should take into consideration all elements that can impact on the broader transmission connected system of east and south-east Australia.
50	Do you agree that the current voluntary requirement for market participants to provide information to AEMO results in a poor quality of information in the GSOO? If not, please explain why.	AEMO agrees that the current voluntary requirement for market participants to provide information to AEMO results in the potential for inconsistencies and the current drafting allows AEMO to fulfil its obligation more easily.
51	Do you agree that compelling market participants to provide information required for GSOO preparation will benefit the quality of information in the GSOO? If not, please explain why.	AEMO agrees that compelling market participants to provide information required for GSOO preparation will benefit the quality of information in the GSOO. This will ensure a consistent approach is required of all gas industry participants and will ensure a standard approach to the collection of data. This also streamlines the process as AEMO has other means to collect this information, though these means are cumbersome to enact.
52	Do you agree with the options that have been identified in section 8.3, or are there other options that could be considered that would result in the GSOO better achieving its objective? If you think there are other options that could be considered, please explain what the options are, what they would involve and what the advantages, disadvantages, costs, benefits and risks are with these additional options.	AEMO agrees with the options identified in section 8.3
53	In relation to the options set out in section 8.3: (a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option? (b) What incremental benefits do you think are associated with option 2?	The objective of the GSOO is, as noted in the document, to enable gas market participants and governments to make more informed and efficient planning, investment and policy decisions consistent with the National Gas Objective. AEMO supports the options set out in section 8.3 to further enable AEMO to carry out the function of producing the GSOO.

	(c) What incremental costs do market participants expect to incur under option 2? (d) Are there any refinements that could be made to option 2 to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1?	
54	If you think the transparency measures set out in section 8.3 should be implemented through alternative means, please explain how you envisage this would work how this would contribute to the NGO and the Energy Council's Vision as set out in Box 1.1.	

8. Risk analysis

Number	Questions	Feedback
55	Do you agree with the identified risks and treatments associated with maintaining the status quo, as set out in Tables A.1 and A.2? If not, please explain why. If you think there are other risks and treatments that could be included in Tables A.1 and A.2, please elaborate.	
56	Do you agree with the identified risks and treatments associated with implementing recommendations described in options 2, 3, and 4, as set out in Tables A.3 and A.4? If not, please explain why. If	

Number	Questions	Feedback
	you think there are other risks and treatments that could be included in Tables A.3 and A.4, please elaborate.	

9. Cost Benefit Analysis

Number	Questions	Feedback
57	Are you aware of any upcoming changes at a government level or private sector level that the CBA should take into account under the status quo scenario? If so, please explain what the changes are and how best to account for those changes in the CBA.	
58	Do you agree with the identified costs and benefit categories set out in Table 9.2? If not, please explain why? If you think there are other costs and benefit categories that could be considered in the CBA, please explain those cost categories and how best to capture them in the CBA.	
59	Do you have any information on the costs and benefits outlined in Table 9.2? If so, please elaborate on the components and quantum of the costs and benefits.	Further analysis needs to be conducted to refine the cost estimates for example – • Registration costs • Legal and business input into procedural changes across GSOO and BB as well as industry consultation • Changes and integration to GSOO data collection processes • Data submission and reporting requirements ensuring a fit-for-purpose design is implemented.

Number	Questions	Feedback
60	Do you agree with the proposed discount rate and appraisal period input variables to be used for the central case and sensitivity testing? If not, please explain why.	
61	Do you think there are other input variables which should be sensitivity tested in the CBA? If so, please explain what other input variables should be tested.	

10. Commonwealth Regulatory Burden Measure Analysis

Number	Questions	Feedback
62	Do you have any information on the regulatory burden costs related to existing reporting requirements? If so, please elaborate on the components and quantum of the costs.	

11. Competition Effects Analysis

Number	Questions	Feedback
63	Do you agree with the proposed approach to qualitatively assess the competition implications of each policy option described in this RIS paper? If not, please explain why.	
64	Do you agree with the categories of key stakeholder groups identified for this analysis? If not, please explain why.	

Number	Questions	Feedback
65	Do you agree with the proposed seven-point scale to be used for this analysis? If not, please explain why.	
66	Do you have any information on potential competition effects arising from each of the policy options summarised in **Table 9.1?** If so, please elaborate.	

12. National Gas Law Amendments

Item number	Amendment	Issue	Feedback
	Part 1	**Preliminary**	
1	2-Definitions		
2	2-Definitions		
	Part 2	**Amendment of National Gas Law**	
3	91DD	Given the nature of the GSOO, its planning horizon and the significant investment gas industry participants make, AEMO considers the maximum penalties in 91DD to be so low as to not be a deterrent. AEMO understands that these are being review separately.	AEMO supports a further review of the current penalties.
4	2-Definitions	definition of LNG facility	AEMO notes that LNG facility is introduced as a natural gas facility, but no further definition of LNG facility is provided. The terms LNG processing facility, LNG export facility and LNG import facility are introduced in the proposed changes to part 18. AEMO questions whether the term LNG facility should be defined in the NGL?

Item number	Amendment	Issue	Feedback
5	2-Definitions	The introduction of *LNG service provider* potentially captures the existing definition *declared LNG storage provider.*	AEMO notes that this doesn't create any inconsistencies, but further work could be conducted at a later date to simplify definitions in the NGL and subsequently in different Parts of the NGR.
6	2-Definitions	The change to the definition of producer to include "and includes a production service provider"	AEMO has not conducted a thorough review of other parts of the NGR to ensure that the term producer has been consistently applied considering the changes proposed in the definition of producer in the NGL.

13. National Gas Regulations Amendments

Item number	Amendment	Issue	Feedback
	Part 1	**Preliminary**	
1	[Insert section and subsection reference]	[Insert section/subsection text]	
2	[Insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
	Part 2	**Variation of National Gas (South Australia) Regulations**	
3	[Insert section and subsection reference]	[Insert section/subsection text]	
4	[Insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	

14. National Gas Rules Amendments

Item number	Amendment	Issue	Feedback
	Part 15B	**Procedures**	
1	135EA(6) and 135KF(1)	[Insert section/subsection text]	There is a conflict between Section 135EA (6) and Section 135KF (1), that specifies the GSOO Procedures may specify the form of GSOO surveys and the GSOO Procedures must specify the form of GSOO surveys respectively. i.e. conflicting levels of obligations on the same set of requirements. AEMO's proposed changes **Section 135EA (6)** The GSOO Procedures may deal with the following matters: **c)** the content ~~and form~~ of GSOO surveys **d)** requirements for GSOO survey responses including ~~form,~~ content, basis of preparation and response times; **Section 135KF (1)** The GSOO procedures must specify the GSOO survey process including: **b)** the form of GSOO surveys.
2	[insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
	Part 15D	**Gas statement of opportunities**	
3	15D	[Insert section/subsection text]	Part 15D has now been divided into Divisions. Part 15D is named "Gas statement of opportunities". Division 1 is named "Interpretation and application". Division 2 is named "Gas statement of opportunities", the same as its parent part, Part 15D. Based on the convention for the rest of the NGR, a Division should not have the same name as its parent Part. AEMO suggests this should be "Contents and publication of Gas statement of opportunities" as more meaningful.

Item number	Amendment	Issue	Feedback
4	15D	[Insert section/subsection text]	Among the GMRG's recommendations was that AEMO should publish production cost estimates annually as part of the GSOO. There is no provision within the Law or Rules for this requirement. AEMO supports this being included in Part 15D of the NGR
	Part 17	**Miscellaneous provisions relating to the AER**	
5	[insert section and subsection reference]	[Insert section/subsection text]	
6	[insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
	Part 18	**Natural Gas Services Bulletin Board**	
7	Division 3, Subdivision 3.2, Rule 155	AEMO is concerned with the current drafting of the Rules with regards to field owners. As written the Rules contemplate that closely related entities may form a field owner group for their combined net revenue interest but it does not allow a closely related entity who does not hold a net revenue interest in that BB field to form part of that field owner group. This is likely to result in an unnecessarily high number of registrations to occur, creating an administrative burden for both participants and AEMO. AEMO's intent with the proposed changes are • To allow a single company to be registered as the responsible field owner for all interests in all fields held by closely related entities of that company. • Where that company doesn't have to have an interest in a gas field • only the company is required to register the grouped interests in all fields and register as the reporting entity.	AEMO's proposed changes are as follows, noting that AEMO is open to suggestions on how to better draft this. 155 Registration of a field owner as part of a field owner group (1) If two or more closely related entities each hold a net revenue interest in a BB field, those entities ~~may form~~ are a **field owner group** for their combined net revenue interests in the BB field (the **grouped BB field interest**). (2) Subject to clause 2A, the members of a field owner group must appoint ~~one of their members~~ a closely related entity of the members in writing to be the **responsible field owner** for the grouped BB field interest for the purposes of this Part. (2A) If the members of a field owner group for a BB field are closely related entities of the members of one or more field owner groups for one or more different BB fields, the members of all those field owner groups [must][may] appoint the same closely related entity in writing to be the responsible field owner for each grouped BB field interest for the purposes of this Part.

Item number	Amendment	Issue	Feedback
		• the closely related entities with the interest in the field are exempt from registering the grouped interest or registering as a reporting entity • that company is responsible for reporting for all interests in all fields held by closely related entities of that company • when applying for registration, confirmation from all members authorising the company to be reporting entity must be provided to AEMO • AEMO is not required to check that the company has access to all the information required to be reported • AEMO's preference is for this registration structure to be mandatory (although if a single company is a group won't have access to all the information, making this registration structure mandatory won't work)	(2B) The closely related entity appointed under clause 2 is not required to be a member of any of the field owner groups referred to in clause 2 or clause 2A or have a net revenue interest in a BB field. (3) For the purposes of this Part and the BB Procedures, the members of a field owner group are taken to have authorised the responsible operator appointed in accordance with subrule (2) to perform the obligations and exercise the rights of a field owner under this Part and the BB Procedures in relation to the BB field interests. (4) The responsible field owner of a field owner group must apply to: (a) register the grouped BB field interest under this Part; and (b) register under this Part as the BB reporting entity for the grouped BB field interest.
8	Division 5, Subdivision 5.2, Rule 171B(2)	The current 50 PJ threshold should be expanded to ensure relevant fields are captured.	AEMO considers that 50 PJ is appropriate but should also include those fields below 50 PJ if it meets the PRMS criteria of being at least a category 4, a contingency resource in the development pending or in the planning phase. This would ensure smaller fields are captured when they are getting close to development, but not the f small fields where recovery is unlikely.
9	195C	Aggregation of short-term gas transactions	AEMO considers that short term gas transaction information should not be aggregated as this will provide a greater level of transparency regarding gas transactions. AEMO agrees that the transactions should be published anonymously.
	Part 18A	**Compression and storage terms and prices**	
10	[insert division, section and subsection reference]	[Insert section/subsection text]	
11	[insert division, section and subsection reference]	[Insert section/subsection text]	