

## Attachment A

## AGIG Stakeholder feedback template

### 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.	No response.

### 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?	No response.
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.	No response.

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### 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?	In addition to the deficiencies identified, we believe there needs to be more consideration for deficiencies which affect medium and smaller C&I users. Table 4.2 notes "producers and retailers that participate in more trades...[have] access to better information than commercial and industrial (C&I) users". While providing upstream information, including short-term and long-term GSAs will help in this regard, strong consideration should be given to further transparency about the availability and price of gas for medium sized C&I users. These users have more limited capacity to understand and analyse upstream and larger scale pricing information and need access to information about market conditions, beyond relatively short-term timeframes.
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?	No response.
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.	Yes. There has been a significant focus in recent years on additional transparency in gas transportation markets (particularly with the introduction of Part 23 of the National Gas Rules). However, limitations in the availability of information for gas prices and LNG continue to affect customers as demonstrated in the ACCC's recent Gas Inquiry. Further transparency is warranted, consistent with our response to question 4.
7	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	The information from the GBB and the ACCC gas inquiry has proven useful in developing a more detailed understanding of gas markets in Australia, and providing a foundation for further analysis.

8	<p>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)?</p> <ul style="list-style-type: none"> <li>○ production cost estimates;</li> <li>○ short-term GSA prices;</li> <li>○ long-term GSA prices;</li> <li>○ LNG netback prices;</li> <li>○ LNG export prices; and</li> <li>○ the standing prices and actual prices paid for compression and storage facilities.</li> </ul> <p>(a) If so, please explain how you would use this information and the net benefit it would provide.</p> <p>(b) If not, please explain why.</p>	<p>We support the publication of additional information on short and long-term GSAs and LNG, which will reduce information deficiencies for customers.</p> <p>With regards to standing and actual prices for storage and compression, we note the forthcoming Gas Pipeline Regulation Impact Statement will consider whether actual prices for infrastructure facilities should be more openly provided. We therefore consider the question of price disclosure should be deferred to that consultation.</p> <p>We do however consider that if actual prices are to be published they should be published on a weighted average basis to avoid potential breaches of confidentiality, consistent with page 58 of this Consultation RIS.</p>
9	<p>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.</p>	<p>No response.</p>
10	<p>In relation to the options set out in section 4.3:</p> <ul style="list-style-type: none"> <li>(a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option?</li> <li>(b) What incremental benefits do you think are associated with options 2-4?</li> <li>(c) What incremental costs do market participants expect to incur under options 2-4?</li> <li>(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</li> </ul>	<p>No response.</p>

	<p>achieve the NGO and the Energy Council's Vision as set out in Box 1.1?</p> <p>(e) Do you agree with the proposed reporting frameworks for short-term GSAs, swaps and/or secondary trades of storage capacity? If not, please explain what you think should change and why.</p>	
11	<p>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.</p>	<p>No response.</p>

## 4. Supply and availability of gas

Number	Questions	Feedback
12	<p>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?</p>	<p>In addition to the information deficiencies outlined above, we understand from commercial and industrial customers that there continues to be insufficient information about the availability, supply and price of gas to these customers. While the focus of this report has been on improving information about the supply and availability of gas upstream, a deficiency about the supply and availability of gas, and in turn poor liquidity, for medium sized customers is likely to persist without additional measures.</p> <p>We encourage the ACCC-GMRG to further analyse the market failures and information deficiencies for commercial and industrial customers. The upstream measures discussed in this section should help improve retailers' understanding of market dynamics, however it is not clear this improvement will flow-through in the to improved availability of information on the supply and availability of gas for commercial and industrial customers. It is vital that improvements in information about the availability and supply of gas, flow-through to better information about offers available for medium-sized C&amp;I users.</p> <p>AGIG has previously noted that market-making measures, requiring the publication of medium term offers by retailers, would further assist commercial and industrial customers to understand the availability and price of gas. Such an approach would</p>

Number	Questions	Feedback
		mirror similar arrangements being developed in electricity markets, and already in place in the UK.
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?	As above.
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.	Yes – reflected by the lack of availability and access for customers to contract offers of a reasonable term and price.
15	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	No response.
16	<p>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)?</p> <ul style="list-style-type: none"> <li>○ 1P, 2P, 3P reserves, 1C and 2C contingent resources;</li> <li>○ Links to public information on exploration activities;</li> <li>○ Drilling activities;</li> <li>○ Volume of gas contracted under existing GSAs; and</li> <li>○ LNG import volume and operational information.</li> </ul> <p>(a) If so, please explain how you would use this information and the net benefit it would provide.</p> <p>(b) If not, please explain why.</p>	No response.
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	No response.

Number	Questions	Feedback
	explain what the options are, what they would involve and what the advantages, disadvantages, costs, benefits and risks are with these additional options.	
18	<p>In relation to the options set out in section 5.3:</p> <p>(a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option?</p> <p>(b) What incremental benefits do you think are associated with options 2-4?</p> <p>(c) What incremental costs do holders of gas reserves and resources, LNG import and LNG export facilities expect to incur under options 2-4?</p> <p>(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?</p>	No response.
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.	No response.

## 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	No response.

Number	Questions	Feedback
	deficiencies that are adversely affecting the gas markets in eastern and northern Australia?	
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?	No response.
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.	No response.
23	To what extent have you been using the existing information regarding LNG exporters' demand-supply balance as published in the ACCC Gas Inquiry?	No response.
24	<p>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)?</p> <ul style="list-style-type: none"> <li>○ Large users' information on nameplate capacity and daily actual gas consumption;</li> <li>○ LNG export facility operational information; and</li> <li>○ LNG export facility shipment information.</li> </ul> <p>(a) If so, please explain how you would use this information and the net benefit it would provide.</p> <p>(b) If not, please explain why.</p>	No response.
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?	No response.

Number	Questions	Feedback
	<p>(a) If so, please explain how you would use this information and the benefit it would provide.</p> <p>(b) If not, please explain why.</p>	
26	<p>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)?</p> <p>(a) If so, please explain how you would use this information and the net benefit it would provide.</p> <p>(b) If not, please explain why.</p>	No response.
27	<p>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.</p>	No response.
28	<p>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.</p>	No response.
29	<p>In relation to the LNG export information:</p> <p>(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.</p> <p>(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.</p> <p>(c) Do you agree the 20 business day lag is required to address potential concerns about the publication of LNG</p>	No response.

Number	Questions	Feedback
	export information and if so, is this measure effective? If not, what would address those concerns?	
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.	No response.
31	<p>In relation to the options set out in section 6.3:</p> <p>(a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option?</p> <p>(b) What incremental benefits do you think are associated with options 2-4?</p> <p>(c) What incremental costs do LNG exporters, LNG facility operators and large users expect to incur under options 2-4 in section 6.3?</p> <p>(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?</p>	No response.
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.	No response.

## 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?	<p>The majority of the information deficiencies identified represent inconsistencies, either between the approach for pipelines facilities and standalone compression and storage facilities; or between scheme and non-scheme pipelines. We agree that the approach should be consistent across these asset classes.</p> <p>With regard to pipeline developments, we have concerns with the characterisation of “proposed” projects, outlined in more detail in Question 36 below.</p>
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?	No response.
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.	No response.
36	<p>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)?</p> <ul style="list-style-type: none"> <li>○ Proposed and committed infrastructure developments;</li> <li>○ 36-month uncontracted capacity outlook for storage and stand-alone compression facilities, and production facilities providing third party access;</li> <li>○ Stand-alone compression facilities to report operational information; and</li> </ul>	<p>The characterisation of “proposed” projects, as outlined in Box 7.2, raises concerns about the extent to which project developers may be required to report projects well before even internal company approvals to proceed have been received. The criteria appear to assume a pipeline development, for example, moves through a clearly defined set of steps in a specific order. However, this is not necessarily the case. For example a project may not have financing arrangements in place until after planning or other approvals are in place. Or financing arrangements may be</p>

Number	Questions	Feedback
	<ul style="list-style-type: none"> <li>○ A list of users with contracted capacity under storage and stand-alone compression facilities.</li> <li>(a) If so, please explain how you would use this information and the net benefit it would provide.</li> <li>(b) If not, please explain why.</li> </ul>	<p>confirmed but the project may not be publicly announced (for example the intention may be to use internal funds).</p> <p>The approach as outlined in Box 7.2 risks confidential and/or planning information being released to the public and competitors before it is required from a market perspective (including for businesses listed outside Australia).</p> <p>We therefore believe the approach to “proposed” developments should not be adopted. “Proposed” developments should be limited to those that have been approved and publicly announced as a threshold criteria and meet one or more of the other criteria. This will include a number of developments in addition to those currently categorised as “committed”. Much of this information is already available to gas market participants but not collated by the Gas Bulletin Board.</p>
37	<p>Do you agree that requiring project proponents to provide the proposed information on gas infrastructure developments will deliver an overall net benefit to gas market participants and policymakers?</p> <ul style="list-style-type: none"> <li>(a) If so, please explain how you would use this information and the net benefit it would provide.</li> <li>(b) If not, please explain why.</li> </ul>	<p>We agree that some additional information on gas infrastructure can be of some benefit to gas market participants, although expect providing the information through the Bulletin Board will deliver only a marginal benefit.</p>
38	<p>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.</p>	<p>See Question 36 above. “Proposed” developments should be limited to those publicly announced as a threshold criteria and which meet one or more of the other criteria.</p>
39	<p>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.</p>	

Number	Questions	Feedback
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.	No response.
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.	No response.
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? (a) If so, please explain how you would use this information and the net benefit it would provide. (b) If not, please explain why.	No response.
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.	No response.
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?	No response.

Number	Questions	Feedback
45	Do you agree that the materiality threshold should be changed? If not, please explain why.	No response.
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.	No response.
47	<p>In relation to the options set out in section 7.3:</p> <ul style="list-style-type: none"> <li>(a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option?</li> <li>(b) What incremental benefits do you think are associated with options 2-4?</li> <li>(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?</li> <li>(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?</li> </ul>	<p>We believe that option 2 is most suitable—balancing the benefits for market participants while managing risks around competition and confidentiality in publishing infrastructure developments.</p> <p>Should option 2 be adopted, to partially address these concerns, the definition and criteria for “proposed” developments should be amended to ensure that only publicly announced projects, which also meet one of the other criteria, are reported to the bulletin board.</p>
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.	As above for question 47.

## 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.	Given the connection of the Northern Territory gas market to the broader east coast market we support the inclusion of the Northern Territory in the GSOO.
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.	No response.
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.	No response.
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.	No response.
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?	No response.

	<p>(c) What incremental costs do market participants expect to incur under option 2?</p> <p>(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?</p>	
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.	No response.

## 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.	No response.
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	No response.

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.	No.
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.	Yes.
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.	No response.
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.	No response.

Number	Questions	Feedback
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.	No response.

## 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.	No response.

## 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.	No response.
64	Do you agree with the categories of key stakeholder groups identified for this analysis? If not, please explain why.	No response.
65	Do you agree with the proposed seven-point scale to be used for this analysis? If not, please explain why.	No response.

Number	Questions	Feedback
66	Do you have any information on potential competition effects arising from each of the policy options summarised in <b>Table 9.1</b> ? If so, please elaborate.	No response.