

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.	LNG maintenance data is already captured on the BB. Supply data would be an advantage; not sure re demand data from international contracts – data re non-contracted supply would be of more use

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?	(a) Reserves and resources are calculated and reported according to Petroleum Resource Management System (PRMS) - the oil and gas industry's global standard for resource classification and reporting – as well as complying with ASX reporting requirements, any additional category would need to be compliant with these. (b) Reserves upgrades and downgrades should be reported separately.

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.	
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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?	<p>Pipeline operators are now required to publish and make publicly available pricing and capacity information.</p> <p>There is an information deficiency in relation to price opaqueness.</p>
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?	<p>Gas production costs have not reflected market prices.</p> <p>The LNG netback price has artificially created a floor domestic gas prices – when first published at calculated rates higher than current market prices, the STTM immediately rose by \$1 - \$2 per GJ. Now the published rate is lower than current market prices and gas prices have not dropped to the same degree.</p>
6	Do you agree that the information deficiencies for gas, LNG export and infrastructure prices could be viewed as a market	Yes, the implementation of the QLD LNG export projects without any domestic supply obligation could be viewed as a market failure.

	failure that will warrant government intervention? If not, please explain why.	
7	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	Bulletin Board for information on a semi regular basis, ACCC Gas Inquiry – all interim reports have been read with salient information disseminated within the business
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)? <ul style="list-style-type: none"> o production cost estimates; o short-term GSA prices; o long-term GSA prices; o LNG netback prices; o LNG export prices; and o the standing prices and actual prices paid for compression and storage facilities. <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>	Agree with the publication of these on the basis GSA prices and actual prices paid for compression and storage facilities remain anonymous. Allows all parties to come to the negotiation table with access to accurate and timely information that is easy to find and access.
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.	Partially – see comments to point 10 below.
10	In relation to the options set out in section 4.3: <p>(a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option?</p>	A day ahead trade on the Moomba or Wallumbilla Hub is very different to a GSA between 2 parties which is the subject of a mutually agreed and negotiated term contract for a period of up to 12 months. If COAG is looking to see more of the shorter term interparty “trades” that are done outside of the hubs then the contract

	<p>(b) What incremental benefits do you think are associated with options 2-4?</p> <p>(c) What incremental costs do market participants 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> <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>	<p>length should be significantly shortened to maximum 1 month? Beyond that it is arguably not a comparable transaction.</p> <p>The requirement to report within 1 day of a trade being completed is not realistic. Is this when parties agree on the terms, when the contract is executed or some other time.</p> <p>Option 4 – information on gas swaps. Gas swaps are essentially taking pressure off transport capacity, not increasing or decreasing the amount of gas available in the market – do not think this adds any particular value.</p> <p>Reporting of historic gas prices provides little benefit; the market is very different and long term flat priced contracts are not relevant to negotiating a contract now.</p> <p>Mandatory reporting of all requests and offers – at what point in a discussion between a buyer and a seller do these need to be reported? When an offer or request made formally in a form that is capable of being accepted? Risk is that mandatory reporting removes all ability to have a commercially in confidence discussion with a party.</p>
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.	

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	<p>Agree that information should be collected and then disseminated in a consistent manner.</p> <p>Not sure that all drilling and seismic activity should be publicly available – what impact on unlisted companies?</p>

Number	Questions	Feedback
	deficiencies that you think are adversely affecting the gas markets in eastern and northern Australia?	
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?	Information should be collected and disseminated in a consistent manner
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.	There is information available on gas supply and availability – the issue is that it is not disseminated in a central location that is known and easy to access; “market failure” may be too strong a term.
15	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	Use both as reference points
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"> ○ 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. <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>	Yes agree so long as the information was provided along with explanatory notes and or with context – reserve and resource data without context could be misleading to a company that did not understand the likelihood or risk of these volumes of gas ever being available to the market.
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	LNG supply/demand balance in option 4 would be very useful to understand the potential volumes available for domestic supply.

Number	Questions	Feedback
	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.	
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?	
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	Yes agree with the reporting inconsistencies

Number	Questions	Feedback
	explain why. Are there other demand related information 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?	Because information on supply/demand balance is not collected in a mandatory way/not disseminated in a single location the figures that are available are unreliable
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.	Agree there are deficiencies but think market failure may be too strong a descriptor.
23	To what extent have you been using the existing information regarding LNG exporters' demand-supply balance as published in the ACCC Gas Inquiry?	For reference purposes
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"> ○ Large users' information on nameplate capacity and daily actual gas consumption; ○ LNG export facility operational information; and ○ LNG export facility shipment information. <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>	Daily reporting of actual consumption data/intra-day changes may place unrealistic reporting burden on 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?	If a large gas user has a contract for gas that has already been reported, as well as daily usage and capacity information as outlined in other sections of this transparency measure then demand is already known.

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>	<p>10TJ per day as a large user may be too small? This equates to 3.6PJ per annum in a market with demand of over 490 PJ ex LNG or 1918 PJ per annum with LNG (2019 GSOO 2020 neutral gas consumption forecast)</p> <p>As a large gas user we provide annual forecasts of gas demand; providing a daily forecast 12 months out is only going to be that annual forecast figure divided by the days in the year? Unrealistic to think a user will be able to accurately forecast that far in to the future.</p> <p>Large users required to report nameplate capacity and daily actual consumption the following day. Not sure the purpose of the daily actual consumption being published the following day- it has already occurred so what opportunity for the market to react?</p>
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>	<p>If the NT LNG facilities will have the ability to make gas available to the domestic market then yes they should be included, if they have no ability then no as will have no impact on market</p>
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>	
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>	

Number	Questions	Feedback
	<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 export information and if so, is this measure effective? If not, what would address those concerns?</p>	
30	<p>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.</p>	
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>	<p>Large gas users providing forecast information on planned shutdowns and/or information on unplanned shutdowns may provide better insight to the market than 12 month forecasts of daily demand.</p>

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.	

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?	Would question the benefit of companies having to report proposed infrastructure. If the project has not reached FID/is not committed to by the proponent then having it included may artificially inflate infrastructure supply figures which could result in companies making investment decisions based on "false " information.
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.	As per previous comments agree there are deficiencies but "market failure" may be too strong
36	Do you agree with the AEMC's and ACCC-GMRG's recommendations on how to address these information	See comment to item number 33 re proposed infrastructure

Number	Questions	Feedback
	<p>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"> ○ 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. <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>	
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> <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 – see comment to item 33
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>	See comment on item 33
39	<p>Do you agree the rules requiring compression service facilities registered under Part 24 to provide operational information should</p>	

Number	Questions	Feedback
	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	<p>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?</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>	
43	<p>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?</p> <p>(a) If so, please explain how you would use this information and the net benefit it would provide.</p>	
44	Do you agree that requiring Bulletin Board compression facilities and Bulletin Board storage facilities to provide a list of users with	Yes if there is an ability for 3 rd party access

Number	Questions	Feedback
	contracted capacity for publication on the Bulletin Board will deliver an overall net benefit to gas market participants?	
45	Do you agree that the materiality threshold should be changed? If not, please explain why.	
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.	
47	<p>In relation to the options set out in section 7.3:</p> <ul style="list-style-type: none"> (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? 	

Number	Questions	Feedback
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.	yes
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.	yes
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.	Yes – so long as there is then a review of all other requests for information/voluntary surveys which are all then consolidated so that companies are not providing the same information in different formats to different government bodies
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.	

53	<p>In relation to the options set out in section 8.3:</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 option 2?</p> <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>	<p>Mandatory responses should provide more accurate market wide information. Costs to each responder will be different and will depend on whether or not they are already providing information on voluntary basis and/or responding to other mandatory reports.</p> <p>See comment to item 51 above re consolidation of number of surveys/reports that companies need to respond to</p>
54	<p>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.</p>	

8. Risk analysis

Number	Questions	Feedback
55	<p>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</p>	

Number	Questions	Feedback
	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 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.	

Number	Questions	Feedback
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.	
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.	
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	[Insert section and subsection reference]	[Insert section/subsection text]	
2	[Insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	

Item number	Amendment	Issue	Feedback
	Part 2	Amendment of National Gas Law	
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]	

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	[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 15D	Gas statement of opportunities	
3	[insert division, section and subsection reference]	[Insert section/subsection text]	
4	[insert division, section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
	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	

Item number	Amendment	Issue	Feedback
7	[insert division, section and subsection reference]	[Insert section/subsection text]	
8	[insert division, section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
Part 18A		Compression and storage terms and prices	
9	[insert division, section and subsection reference]	[Insert section/subsection text]	
10	[insert division, section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	