



## 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.	<p>Alinta has previously offered broad support to Bulletin Board arrangements which can provide consolidated short-term capacity outlook information, including aggregate pipeline flows, line-pack data and facility outage information. This information is helpful to Alinta Energy's domestic operations.</p> <p>In relation to some of the longer-term measures as outlined in the transparency measures in the RIS, many of the identified export activities have a subsequent direct effect on the domestic market and as such may need to be captured as part of the RIS process going forward. As such Alinta Energy would support the purpose of the Gas Bulletin Board being further clarified through the RIS or alternative process.</p>

### 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:	Broadly speaking Alinta Energy is of the view that improved gas market transparency offers the benefits of improving market responsiveness and fostering efficient investment decisions. As such, Alinta would be

	<p>(a) an additional category of 'pricing' should be included to capture reserve adjustments due to changes in gas price assumptions?</p> <p>(b) reserves upgrades and downgrades should be combined into a single category?</p>	<p>supportive of 2P gas reserves to be reported on at least once every 12 months by gas field operators.</p>
3	<p>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.</p>	

### 3. Gas, LNG and infrastructure prices

Number	Questions	
4	<p>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>	<p>Broadly speaking, Alinta Energy agrees that some information deficiencies may presently exist in relation to upstream production costs. As a mid-sized new entrant retailer on the East Coast Alinta Energy does not have a large degree of upstream production cost information and how they may vary from field to field.</p> <p>In relation to short- and long-term GSA price disclosures, Alinta Energy is of the view that there are no identified deficiencies which would warrant</p>

		<p>further government intervention at this time. Alinta would highlight growing liquidity in the facilitated gas markets which importantly are standardised exchange agreements.</p> <p>Individual GSA's are non-standardised in nature, ie different delivery points, flex profiles, volumes, put/call/firm, contract term etc, which make it highly challenging to make meaningful comparison solely on the basis of price.</p> <p>In Queensland, the large number of bilateral trades identified in table 4.1 are primarily due to participants trading at major pipeline connection points that are not covered by the facilitated gas markets in order to avoid hub fees and third-party transportation costs.</p>
5	<p>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>	
6	<p>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.</p>	<p>Broadly speaking, Alinta Energy has been supportive of measures which provide information transparency regarding LNG operations in the physical market. For example, Alinta Energy has previously held concerns that some participants may possess prior knowledge of the capacity of LNG production facilities, particularly those producing gas which can be sold into the domestic market.</p> <p>As such, compulsory reporting obligations on upstream gas producers with respect to any medium-term changes in the capacity of their production facilities have been well supported. These transparency measures alleviated concerns associated with information asymmetry, whereby some participants may have possession of information not yet available in the</p>

		<p>market place including information about available capacity or maintenance outage schedules. It is worth noting the work the AEMO has been progressing in this area.</p> <p>However, these information deficiencies extended to the physical conditions of the market, not the pricing conditions. Alinta Energy is of the view that access to LNG export prices is currently not an area of market failure that would warrant Government intervention. Assuming the market has physical transparency in relation to demand and supply, participants should be able to ascertain their own view of pricing.</p>
7	<p>To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?</p>	<p>Alinta Energy utilises in the first instances published market data available on the Market Information Bulletin Board. As a secondary source of information, Alinta Energy does refer to the Bulletin Board.</p>
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 style="text-align: right;">If so, please explain how you would use this information and the net benefit it would provide.</p> <p style="text-align: right;">If not, please explain why.</p>	<p>Broadly speaking, Alinta endorses initiatives which increase physical transparency and promote institutional knowledge. However, Alinta suggests that regulators should consider leveraging off existing professional bodies/industry participant's work in relation to pricing information.</p> <p>By way of example currently, Alinta Energy is aware of a number of privately-run price forecasting publications (or similar) which may provide a useful starting point for the COAG's analysis. For example, Argus Media regularly produces similar LNG price information, production cost estimates, views on GSA prices. In addition, the ASX energy has a futures market established at Wallumbilla. Alinta suggests COAG seek to work collaboratively with the aforementioned bodies to leverage off existing work which may already exist and to promote knowledge specific to pricing concerns.</p>

		<p>It is also worth noting that the Gas Supply hub has now reached a stage of market maturity and liquidity whereby it has become a relevant point of reference for short term GSA and LNG netback prices.</p> <p>As identified above, Alinta Energy does not support government intervention in relation to GSA prices more broadly.</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>The construction of additional pricing transparency measures should be carefully balanced against:</p> <ul style="list-style-type: none"> <li>a) The cost of compliance;</li> <li>b) The risk that constructing multiple price points in the market may create confusion amongst market observers and gas customers if similar points of reference are not realised. Eg net backing prices which don't reference the same international hub.</li> </ul>
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>Whilst Alinta Energy is supportive of transparency measures which improve the ability of participants to make efficient contracting decisions, care must be taken to ensure that transparency reforms are not unduly burdensome or costly to comply with or reforms which create confidentiality concerns for participants.</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>As discussed above, incremental improvements to the Bulletin Board, and improving some of the Bulletin Boards existing known deficiencies may be an alternative cost effective means of implementing additional transparency measures.</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>	
13	<p>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?</p>	
14	<p>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.</p>	

Number	Questions	Feedback
15	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	
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>	<p>Alinta Energy is supportive of transparency measures which act to provide supply side availability information which allows participants to make informed decisions based on gas reserves and resources of unlisted upstream parties, in particular material southern fields with uncertain production profile declines and remaining asset life. This information is helpful to Alinta Energy's business operations.</p>
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 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>	

Number	Questions	Feedback
	<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>	
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?	<p>At present, large gas users are not subject to bulletin board reporting requirements under the NGR and whilst some information can anecdotally be pieced together from information on pipeline flows, this information is largely incomplete.</p> <p>As such, Alinta Energy is of the view that there would be value in transparency measures being placed on large users demand for natural gas, and the operational activities bearing this can have on the market. There may be a role for AEMO to support the provision of more granular</p>

Number	Questions	Feedback
		consumption data metrics which can be provided in a disaggregated format to the broader 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?	
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.	
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	<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>	

Number	Questions	Feedback
25	<p>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?</p> <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>	<p>Yes, however care should be taken to ensure confidentiality and to ensure that adequate protections are put in place to protect the competitive position of individual gas users. This could take place through the potential aggregation of data.</p> <p>The cost of compliance obligations should also be balanced against the value of additional transparency these obligations would provide.</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>	
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>It will be important to ensure that all areas of the interconnected gas markets are covered. As such Alinta Energy supports transparency arrangements being extended to the Northern Territory.</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>	

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?	
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.	
36	Do you agree with the AEMC's and ACCC-GMRG's recommendations on how to address these information	

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"> <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> <li>○ A list of users with contracted capacity under storage and stand-alone compression 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>	
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>	<p>Whilst Alinta Energy is supportive of transparency measures which improve the ability of participants to make efficient investment, care must be taken to ensure that transparency reforms are not unduly burdensome or costly to comply with or reforms which create confidentiality concerns for participants.</p> <p>Any new additional compliance obligations should be subject to a rigorous benefit cost analysis undertaking as part of the next RIS stage.</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>Yes broadly speaking, the wider market should be aware of other proposed and committed projects which might affect their business operations cases. It could be useful for example for proponents to have</p>

Number	Questions	Feedback
		<p>knowledge of possible nearby plants so that they can seek to optimise their connection costs.</p> <p>Nonetheless, this common value of transparency must be balanced against the private value of commercial confidentiality and costs of compliance.</p>
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?	

Number	Questions	Feedback
	<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	<p>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?</p>	
45	<p>Do you agree that the materiality threshold should be changed? If not, please explain why.</p>	
46	<p>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.</p>	
47	<p>In relation to the options set out in section 7.3:</p>	

Number	Questions	Feedback
	<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 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?</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>	
48	<p>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.</p>	

## 7. Gas Statement of Opportunities (GSOO)

Number	Questions	Feedback
49	<p>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.</p>	<p>Yes – Alinta Energy supports extending the GSOO to the Northern Territory now that it is connected to East Coast markets.</p>

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.	Alinta Energy provides high quality information to AEMO when requested to do so, to assist the market operator in the performance of its tasks. Alinta Energy spends time and resources voluntarily providing this information.
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.	Alinta Energy is of the view that compelling participants to undertake in the GSOO via compliance obligations is not required at this time. There is a risk that if information is compelled there may be a detrimental impact on these informal relationships which may inhibit information sharing in other areas as relations become more formal. Perversely, the impact may lead to less information being provided to regulatory bodies and productive engagement with industry going forward.
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	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?	

	<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.	

## 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 treatments that could be included in Tables A.1 and A.2, please elaborate.</p>	<p>Alinta Energy would like to raise a number of identified risks for further consideration.</p> <p><b>1) Information Centralisation Risk</b> - Information gathering powers, centralise contractually sensitive information in the form of price, volume and overall contract positioning. Whilst Alinta Energy appreciates that such information is only gathered and intended to inform the AER/ACCC and other regulatory bodies, the risk of unintentional disclosure and key-personnel risk is a real and non-trivial risk to market participants.</p>

Number	Questions	Feedback
		<p><b>2) Information Interpretation Risk</b> - There is a risk that commercially sensitive GSA, GTA information provided to regulatory bodies through transparency measures isn't particularly meaningful without a concurrent and detailed explanation of market participants' physical position, hedge position, trading strategy, corporate structure and future commercial intentions. There is a risk that normal and pro-competitive conduct may inadvertently be misinterpreted as undesirable.</p> <p><b>3) Compliance Culture Risk</b> - Alinta Energy prides itself on maintaining good working relationships with all regulators, such relationships are best maintained on the basis of informal relationships with the shared aim of maintaining market compliance with the Gas Law. There is a significantly broadening the scope of price information may have a detrimental impact on these informal relationships which may inhibit information sharing in other areas as relations become more formal. Perversely, the impact may lead to less information being provided and less productive engagement with industry going forward.</p> <p><b>4) Increased Costs of Compliance</b> – As discussed previously above</p> <p><b>5) Efficient allocation of industry resources</b> – Some of the options contemplated under the RIS, would potentially require a significant amount of participant's personnel time and resources to successfully deliver the stated objectives. Consideration should be given to the opportunity costs faced by participants in devoting resources away from other value adding industry activities.</p>

Number	Questions	Feedback
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.	
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.	

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 <b>Table 9.1</b> ? If so, please elaborate.	Given long term GSA and GTA prices (in aggregate) may be made available through some of the options contemplated within the RIS, consideration should be given to the effects on competition which may arise through the potential encouragement of coordinated conduct.