



Level 8
70 Franklin Street
Adelaide SA 5000
Australia

GPO Box 1819
Adelaide SA 5001

Tel (Aust.): +61 8 8100 4900
Fax (Aust.): +61 8 8100 4997

customerservice@cooperenergy.com.au
www.cooperenergy.com.au

27 September 2019

COAG Energy Council
GPO 787
CANBERRA, ACT 2601

Via email: gas@environment.gov.au

Consultation RIS – Gas Transparency

Cooper Energy welcomes the opportunity to make a submission in response to the COAG Regulation Impact Statement on Measures to Improve Transparency in the Gas Market.

Cooper Energy is a company focussed on bringing new competitive gas supply to south-east Australia and is a participant in the local gas sector through the exploration, development, production and delivery of gas in south-east Australia to gas buyers in the region.

This includes:

- Cooper Energy's contribution to develop new gas supply. Cooper Energy is about to bring on-line south-east Australia's first new offshore gas supply in 3 years when the \$605 million Sole Gas Project commences production. Sole will supply industrial users and utilities for 10 years. Cooper Energy acquired an interest in the Sole gas field in 2015 as a key component of the company's strategy to meet the emerging gas needs in south-Australia.
- Cooper Energy ranks among the most active producers signing new domestic gas supply agreements for south-east Australia. The company's contract portfolio includes agreements with buyers including utilities AGL Energy, Origin Energy, Alinta Energy and Energy Australia and industrial buyers O-I and Visy.
- Cooper Energy is an existing supplier of gas to south-east Australia from its Casino-Henry fields Operated by Cooper Energy, and the Minerva gas field Operated by BHP.
- Cooper Energy is investing hundreds of millions of dollars in exploring and developing new and existing gas fields in south-east Australia for supply to the domestic market.

This position in the local gas sector has been built over the previous 7 years under a gas strategy which foresaw the potential for an emerging tight gas supply market in south-east Australia. The premise of the strategy is the fundamental point identified and reiterated by the ACCC in its ongoing gas enquiry: the best source of gas for south-east Australia is gas from south-east Australia.

As a gas producer and supplier to gas buyers in south-east Australia, Cooper Energy is reliant on a sustainable, efficient and competitive domestic gas market. In this regard, Cooper Energy is supportive of measures to improve transparency in the gas market to support these objectives.

However, it is important that future information reporting requirements drive benefits that outweigh costs and support meaningful and accurate analysis. With regard to the RIS, Cooper Energy makes comment on a number of areas where it believes the cost-benefit relationship is challenged or information is vulnerable to being used out of context.

We would welcome the opportunity to discuss these comments with you. Please feel free to contact Mr Eddy Glavas, General Manager Commercial & Business Development on (08) 8100 4900 or eddy.glavas@cooperenergy.com.au if you have any queries.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'eddy', with a long, sweeping flourish extending to the right.

Eddy Glavas
General Manager, Commercial & Business Development

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.	

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?	2(a) Cooper Energy does not support an additional category of 'pricing' to be included in the reserve reconciliation. Gas pricing is one of many assumptions (together with capex, opex, etc) which drive the commercial assessment of 2P reserves. Drawing sole focus to this one assumption may mislead the data user of the relative importance of the gas price assumption relative to other assumptions used. 2(b)

		Yes, Cooper Energy believes reserve upgrades and downgrades should be contained in a single category 'revisions' as per SPE PRMS guidelines.
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.	<p>Cooper Energy does not support the recommendation to report reserves and resources at a field level. Cooper Energy would be supportive of consistent geographical region reporting by producers down to a hydrocarbon province//basin level. Beyond this level, reporting would be extremely onerous on producing companies (e.g. Cooper Basin producers having to report across dozens of individual fields).</p> <p>If the government is determined to implement reporting obligations at a more granular level, Cooper Energy believes that a materiality threshold should apply to the reporting requirements. This materiality threshold should ensure that only fields which have a material impact on the local market supply and demand position are reported and overall costs to industry participants are minimised.</p> <p>Cooper Energy supports the use of the SPE PRMS guidelines to define a field or project as follows:</p> <p><i>"In conventional reservoirs, a field is typically an area consisting of a single reservoir or multiple reservoirs all grouped on, or related to, the same individual geological structural feature and/or stratigraphic condition....For unconventional reservoirs without hydrodynamic influences, a field is often defined by regulatory or ownership boundaries as necessary."</i></p>

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?	
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?	
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.	<p>Cooper Energy acknowledges the greater price discovery and transparency which has resulted from the ACCC's gas market reports.</p> <p>As a gas producer and supplier to gas buyers in south-east Australia, Cooper Energy is committed to fostering a competitive and sustainable long-term domestic gas market. This can be achieved where gas prices balance at levels where gas remains a competitive source of energy for end users, whilst sufficient to incentivise existing and new producers to explore and develop new gas supply. This is best achieved in an environment where gas prices are set by the market via commercial negotiation and without Government intervention designed to direct gas supply terms.</p>
7	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	

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"> ○ production cost estimates; ○ short-term GSA prices; ○ long-term GSA prices; ○ LNG netback prices; ○ LNG export prices; and ○ the standing prices and actual prices paid for compression and storage facilities. <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>Cooper Energy believes the reporting of production costs is vulnerable to be used out of context and lead to over-simplified and incorrect conclusions over the profitability of producers. Production cost estimates should have due regard to:</p> <ul style="list-style-type: none"> ○ the lifecycle asset costs. That is the cost of exploring (including both successful and unsuccessful efforts), developing, producing and abandoning gas fields ○ the required return of an on capital invested commensurate with the inherent risk in each asset and company portfolio ○ uncertainty on future production outcomes (i.e. 1P, 2P, 3P) ○ different fields have different characteristics that impact production cost particularly between conventional and unconventional, onshore and offshore fields <p>Developing a standardised framework for producers to account for the factors above is challenging.</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>	
10	<p>In relation to the options set out in section 4.3:</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 market participants expect to incur under options 2-4? (d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst 	

	<p>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>	
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 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?	
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.	

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"> ○ 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>	<p>Cooper Energy believes much of the information identified is reported to and maintained by various gas market regulatory agencies. Greater information sharing between these agencies in order to collate and publish public information in a single source would assist to reduce industry costs and limit inconsistency of information in the public domain.</p> <p>Cooper Energy recommends that contingent resource reporting requirements are made consistent with the requirements of the ASX listing rules; i.e. companies can either report 2C contingent resources, or full 1C/2C/3C range. Cooper Energy would be supportive of either as a requirement but not 1C and 2C without 3C.</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?	
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?	

Number	Questions	Feedback
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"> ○ 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>	
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>	
26	Do you agree with the list of information that large users, LNG facility operators and LNG export facilities would be required to report (e.g. do you agree that LNG facility operators should be required to report on the volume of LNG in storage facilities)?	

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>	
27	Do you think that Northern Territory LNG facilities should be included or exempt from reporting the proposed operational and shipment information? Please explain your view.	
28	Do you have any suggestions for alternative/additional information that would improve demand side information on the Bulletin Board? If so, please explain your suggestions.	
29	<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 export information and if so, is this measure effective? If not, what would address those concerns?</p>	
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.	

Number	Questions	Feedback
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>	
32	<p>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.</p>	

6. Infrastructure used to supply gas to end-markets

Number	Questions	Feedback
33	<p>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</p>	

Number	Questions	Feedback
	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	<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"> ○ 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>	

Number	Questions	Feedback
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>	
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>	
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>	
40	<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>	
41	<p>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.</p>	

Number	Questions	Feedback
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	<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>	

Number	Questions	Feedback
47	<p>In relation to the options set out in section 7.3:</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 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. Cooper Energy supports the inclusion of supply and demand within the NT into the GSOO.</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.	
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.	
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> <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 option 2? (c) What incremental costs do market participants expect to incur under option 2? (d) Are there any refinements that could be made to option 2 to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1? 	

54	If you think the transparency measures set out in section 8.3 should be implemented through alternative means, please explain how you envisage this would work how this would contribute to the NGO and the Energy Council's Vision as set out in Box 1.1.	
----	--	--

8. Risk analysis

Number	Questions	Feedback
55	Do you agree with the identified risks and treatments associated with maintaining the status quo, as set out in Tables A.1 and A.2? If not, please explain why. If you think there are other risks and treatments that could be included in Tables A.1 and A.2, please elaborate.	
56	Do you agree with the identified risks and treatments associated with implementing recommendations described in options 2, 3, and 4, as set out in Tables A.3 and A.4? If not, please explain why. If you think there are other risks and treatments that could be included in Tables A.3 and A.4, please elaborate.	<p>With regard to the risk identified in ID 5 of Table 3, Cooper Energy believes that a risk of greater significance is the risk that production cost estimates are used out of context leading to an incorrect conclusion around producer margins. Such a conclusion could ultimately result in unfavourable market or policy outcomes which ultimately has the effect of limiting investment in new gas supply.</p> <p>With regard to ID 5 of Table 4, Cooper Energy believes the reporting of producers actual cost of production without careful consideration of how to address the issues raised by Cooper Energy (see the response to question 8) will not mitigate the risk identified in ID 5 of Table 3.</p>

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.	
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]	
	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]	

Item number	Amendment	Issue	Feedback
	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 section/subsection text]	

Item number	Amendment	Issue	Feedback
	[insert extra rows if necessary]		
	Part 17	Miscellaneous provisions relating to the AER	
5	[insert section and subsection reference]	[Insert section/subsection text]	
6	[insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
	Part 18	Natural Gas Services Bulletin Board	
7	[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]	