

## 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.	N/A

### 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?	N/A

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.	N/A
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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?	N/A
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?	N/A
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.	N/A

7	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	N/A
8	<p>Do you agree with the ACCC-GMRG's recommendations on how to address these information deficiencies, which would require the publication of the following (see section 3.3 for more detail)?</p> <ul style="list-style-type: none"> <li>○ production cost estimates;</li> <li>○ short-term GSA prices;</li> <li>○ long-term GSA prices;</li> <li>○ LNG netback prices;</li> <li>○ LNG export prices; and</li> <li>○ the standing prices and actual prices paid for compression and storage facilities.</li> </ul> <p>(a) If so, please explain how you would use this information and the net benefit it would provide.</p> <p>(b) If not, please explain why.</p>	<p>Lochard Energy supports continued publication of prices for compression and storage facilities by means of continuation of the ACCC Gas market Inquiry. Lochard Energy is also of the view that it is reasonable to publish standing prices for a 3 year period.</p> <p>(b) Lochard however has significant concerns with publishing each users' individual prices, potentially as well as key terms and conditions. There are a range of complex, and sometimes bespoke, factors which affect pricing and risk profiles for individual customer contracts for storage services. These may include differing injection/withdrawal/storage ratios, delivery points, options to extend (calls, puts, collars), where there has been an upfront capital contribution etc. If reported in isolation and without the benefit of context, these prices could be misleading or lead to mis-interpretation and confusion. In addition, any publishing of key terms and conditions could result in users being gamed, thereby impacting their competitive position. Therefore Lochard Energy is of the view that publishing such information would not aid the overall goals of increasing transparency and efficient market behaviour.</p> <p>For compression facility standing price and actual price reporting, Lochard is of the same opinion as storage facility price reporting. Currently, Lochard does not have any actual price data paid by users for compression services, as Lochard does not currently offer a compression service separate from its bundled storage services. The standard, published Operational Transportation Service Agreement (OTSA) for secondary or auctioned compression services acquired at Iona provides a general reference point, though currently no OTSAs have been entered into by recipients and no traded or auctioned capacity has been transacted to date.</p>

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.	Refer to response no. 8.
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 achieve the NGO and the Energy Council's Vision as set out in Box 1.1?</li> <li>(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.</li> </ul>	(a) Refer to concerns highlighted in response no. 8.
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.	A key reason for the measures being taken was the assumption that the ACCC Inquiry would end in 2020. However it appears that it will be extended to 2025, hence reporting to the ACCC can continue and the longer term options can be refined.

## 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?	N/A
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?	N/A
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.	N/A
15	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	N/A
16	Do you agree with the AEMC's and ACCC-GMRG's recommendations on how to address these information deficiencies, which would require the publication of the following (see sections 3.1 and 3.3 for more detail)? <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>	N/A

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>	
17	<p>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.</p>	N/A
18	<p>In relation to the options set out in section 5.3:</p> <p>(a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option?</p> <p>(b) What incremental benefits do you think are associated with options 2-4?</p> <p>(c) What incremental costs do holders of gas reserves and resources, LNG import and LNG export facilities expect to incur under options 2-4?</p> <p>(d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1?</p>	N/A
19	<p>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.</p>	N/A

## 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?	N/A
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?	N/A
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.	N/A
23	To what extent have you been using the existing information regarding LNG exporters' demand-supply balance as published in the ACCC Gas Inquiry?	N/A
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>	N/A

Number	Questions	Feedback
	(b) If not, please explain why.	
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>	N/A
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>	N/A
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.	N/A
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.	N/A
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>	N/A

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>	N/A
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>	N/A

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.	N/A

## 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?	N/A
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?	N/A
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.	N/A
36	Do you agree with the AEMC's and ACCC-GMRG's recommendations on how to address these information	Lochard Energy supports the following recommendations:

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>	<ul style="list-style-type: none"> <li>• Proposed and committed infrastructure developments out to 36 months. However given that the prospects for new developments may change according to market conditions, there should be no penalties for reasonable changes to information provided previously.</li> <li>• 36-month uncontracted capacity outlook for storage and stand-alone compression facilities;</li> <li>• Stand-alone compression facilities to report operational information</li> </ul> <p>With reference to publishing a list of users with contracted capacity, Lochard is of the opinion that sufficient information is already available in the market to determine the users with contracted capacity under storage and compression facilities. However as discussed in no. 44, there could be a market benefit in publishing a list of users on the Gas Bulletin Board. Information of the contracted capacity of each user should remain confidential as per the reasons provided in response to no. 44.</p> <p>Lochard also notes that planning data for the Iona storage has been provided to AEMO yearly and incorporated in the GSOO and Victorian Gas Planning Report, which also details Iona's interdependence with the South West Pipeline's capacity to inject gas to and withdraw gas from Iona.</p>
37	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?	N/A

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>	
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>	N/A
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>	<p>Lochard agrees that 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. Lochard is currently providing operational information as both a storage facility and a compression service facility.</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>	Refer to response no. 39.
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>	Refer to response no. 36.
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>	N/A

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>	N/A
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>	<p>Lochard agrees that there could be a market benefit in publishing a list of the users of storage and compression facilities on the Gas Bulletin Board. Visibility of current users may allow new users to seek to trade capacity with existing users, thereby improving market liquidity for storage and compression services.</p> <p>However, the publishing of specific details such as the amount of contracted capacity per user, will expose users to the risk of being gamed, thereby impacting their competitive position. Therefore Lochard Energy is of the view that publishing detailed contract information, beyond a list of users, is not to the net benefit of gas market participants.</p>
45	<p>Do you agree that the materiality threshold should be changed? If not, please explain why.</p>	N/A
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</p>	Yes. Refer to response no.36.

Number	Questions	Feedback
	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"> <li>(a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option?</li> <li>(b) What incremental benefits do you think are associated with options 2-4?</li> <li>(c) What incremental costs do entities developing new gas infrastructure, operators of storage and stand-alone compression facilities, and facilities with a capacity of 10-30TJ/day expect to incur under options 2-4 in section 7.3?</li> <li>(d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1?</li> </ul>	N/A
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.	N/A

## 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.	N/A
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.	N/A
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.	N/A
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.	N/A
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?	N/A

	<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.	N/A

## 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.	N/A
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	N/A

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

## 9. Cost Benefit Analysis

Number	Questions	Feedback
57	Are you aware of any upcoming changes at a government level or private sector level that the CBA should take into account under the status quo scenario? If so, please explain what the changes are and how best to account for those changes in the CBA.	N/A
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.	N/A
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.	N/A
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.	N/A

Number	Questions	Feedback
61	Do you think there are other input variables which should be sensitivity tested in the CBA? If so, please explain what other input variables should be tested.	N/A

## 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.	N/A

## 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.	N/A
64	Do you agree with the categories of key stakeholder groups identified for this analysis? If not, please explain why.	N/A
65	Do you agree with the proposed seven-point scale to be used for this analysis? If not, please explain why.	N/A

Number	Questions	Feedback
66	Do you have any information on potential competition effects arising from each of the policy options summarised in <b>Table 9.1</b> ? If so, please elaborate.	N/A