

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.	Yes. The purpose of the Bulletin Board should reflect the significant changes in the market since 2008 and ensure that it can be readily future proofed as the market continues to evolve.

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	The opaqueness of publicly available 2P Reserves reported in a consistent manner inhibits informed, efficient decision making. (a) Yes

	into a single category?	
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.	As a minimum, there needs to be sufficient granularity to make informed decisions with respect to matching reserves/resources against the locations of where the gas is processed and hence where the gas is able to be accessed.

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?	Yes in relation to Table 4.2
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?	The effect is significant. The lack of information available can impede the comparison of price offers and the determination of the optimum price in an efficient manner. For example in comparing an aggregated price of commodity gas+location swap+ transportation cost compared to a delivered price offer.
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	Yes this is a market failure and warrants government intervention.

	explain why.	
7	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	Used extensively including Bulletin Board price information (eg. GSH), production levels ex Longford/ Moomba, gas composition ex Longford, upcoming maintenance information. Plus ACCC LNG Netback series, contract price transactions.
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"> o production cost estimates; o short-term GSA prices; o long-term GSA prices; o LNG netback prices; o LNG export prices; and o the standing prices and actual prices paid for compression and storage facilities. <p>(a) If so, please explain how you would use this information and the net benefit it would provide.</p> <p>(b) If not, please explain why.</p>	<p>Yes- agree with the recommendations. The information will be used to inform decision making on our gas procurement strategy. For example, informing decisions as to whether to contract long term or rely on the spot traded market.</p> <p>The LNG Netback price should also be further reviewed to ensure it references the "long-run" price, where the fixed costs of the LNG trains are subtracted in the LNG netback calculation. Australian domestic consumers should not be contributing to the capital cost recovery for an asset that is not part of the domestic supply chain and that was sanctioned based on long term export contracts generating this capital recovery.</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.	
10	<p>In relation to the options set out in section 4.3:</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 market participants expect to</p>	<p>Qenos is generally supportive of Option 3 in order to reduce information deficiencies. Most of the additional measures in Option 4 would also further reduce these deficiencies. Specifically, LNG import prices as applicable and gas swap prices.</p> <p>In terms of risks, the following requires consideration</p> <ul style="list-style-type: none"> • Option 3 would require short term off market GSAs to be reported on an

	<p>incur under options 2-4?</p> <p>(d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1?</p> <p>(e) Do you agree with the proposed reporting frameworks for short-term GSAs, swaps and/or secondary trades of storage capacity? If not, please explain what you think should change and why.</p>	<p>aggregated basis and the AER to publish a forward-looking long-term GSA producer and retailer price series. It is unclear at this stage who would be required to report to the regulator with this information but this requirement would potentially place an increased burden on C&I customers. It would also potentially expose information to the market that would not be beneficial to the interests of C&I customers (for instance during negotiations of multiple gas supply deals). The use of aggregation in order to hide the specifics of individual deals may not always work.</p> <ul style="list-style-type: none"> • The requirement for storage facilities and stand-alone compression facilities to publish standing prices and information on prices actually paid for primary capacity is very similar to the existing requirements for pipelines to effectively report the same information. Whilst pipelines are now required to be "more transparent" in their pricing structures, the practical implications on a number of pipelines have been for facility operators to be far less flexible and far less willing to negotiate for more creative arrangements than previously. These facility operators justify this by saying that they cannot offer a deal in this instance because they would then need to offer it to everyone. Such behaviour needs to be checked to ensure the increase in prevalence of transparent information is not used against consumers. • Option 4's requirements for the mandatory listing of gas supply requests and offers on the Gas Bulletin Board or Gas Supply Hub may be problematic and raises questions around what constitutes an offer or a request, and at what point they would need to be reported. As with some of the previous measures discussed, this could impose additional administrative costs on gas market participants, with the most impact being on smaller, less sophisticated users and C&I customers. Another impact may be to stifle competition and strengthen the position of gas suppliers by enabling gas suppliers to publicly signal their pricing to each other. Lower priced gas offers may no longer be as readily available and all gas will become priced at the publicly signalled price. Gas suppliers may decline to offer indicative prices to gas customers unless they are absolute certain that a transaction is expected to occur. This change may reduce the ability of gas customers to obtain gas offers from gas suppliers because the gas suppliers know the offer must be published.
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.	
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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?	Agree with the information deficiencies.
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?	Significant impact. The lack of information is resulting in a lack of confidence to reinvest in existing gas intensive facilities. It is also resulting in sub optimal decision making as to when and to what extent to contract gas.
14	Do you agree that the information deficiencies regarding the supply and availability of gas could be viewed as a market failure that will warrant government intervention? If not, please explain why.	Yes agree.
15	To what extent have you been using the existing information on the Bulletin Board and information published in the ACCC Gas Inquiry?	As per Question 7
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"> ○ 1P, 2P, 3P reserves, 1C and 2C contingent resources; ○ Links to public information on exploration activities; ○ Drilling activities; 	Yes. The information can be used to make long term strategic investment decisions by existing and prospective gas intensive operations. It would also help inform gas procurement strategies of users.

Number	Questions	Feedback
	<ul style="list-style-type: none"> ○ 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>	
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>	<p>Yes, agree with the options</p>
18	<p>In relation to the options set out in section 5.3:</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 holders of gas reserves and resources, LNG import and LNG export facilities expect to incur under options 2-4? (d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1? 	<p>Large gas intensive operations such as Qenos need to make \$10's of million reinvestment in their manufacturing operations in coming years to continue to operate. This level of reinvestment cannot be made in the absence of a long term outlook on information related to gas supply into the future which is informed through such information disclosure using a consistent methodology.</p>
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>	

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?	Yes, in particular the large swings that can be caused by the LNG export and GPG sectors.
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?	A complete picture as to the balance of the market and hence the impact on the broader economy requires information relating to demand.
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.	Yes
23	To what extent have you been using the existing information regarding LNG exporters' demand-supply balance as published in the ACCC Gas Inquiry?	The information is crucial to determine how the LNG exporters are impacting the market.
24	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"> ○ Large users' information on nameplate capacity and daily actual gas consumption; ○ LNG export facility operational information; and ○ LNG export facility shipment information. 	<p>Yes – it will assist with improving understanding re the broader market balance and outlook.</p> <p>Large users to report information on nameplate capacity and daily actual gas consumption to AEMO for publication on the Bulletin Board is not controversial but does pose a couple of questions around data collection. AEMO already has access to this information where the large users reside in the STTM or in the DWGM. Were this requirement to come into effect, would these large users be required to separately report their usage? If this is the case it would impose an substantial administrative burden. The penalties for not complying with this sort of requirement is quite undesirable and so any system for reporting this data to AEMO would need to be robust.</p>

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>	
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 – to enable better understanding of the market balance which feeds into gas contracting decisions and strategy.</p>
26	<p>Do you agree with the list of information that large users, LNG facility operators and LNG export facilities would be required to report (e.g. do you agree that LNG facility operators should be required to report on the volume of LNG in storage facilities)?</p> <p>(a) If so, please explain how you would use this information and the net benefit it would provide.</p> <p>(b) If not, please explain why.</p>	<p>Yes.</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>Genos currently sources as available supply from the NT and so a view on the NT market is useful. Given these facilities are connected to the broader East Coast market they should be included.</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</p>	

Number	Questions	Feedback
	<p>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	<p>Do you agree with the options that have been identified in section 6.3, or are there other options that could be considered? If you think there are other options that could be considered, please explain what the options are, what they would involve and what the advantages, disadvantages, costs, benefits and risks are with these additional options.</p>	
31	<p>In relation to the options set out in section 6.3:</p> <p>(a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option?</p> <p>(b) What incremental benefits do you think are associated with options 2-4?</p> <p>(c) What incremental costs do LNG exporters, LNG facility operators and large users expect to incur under options 2-4 in section 6.3?</p> <p>(d) Are there any refinements that could be made to these options to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1?</p>	<p>The additional measure under Option 4 for large industrials to report a forward daily forecast would likely result in additional compliance costs that would be felt most by the smaller large users within the market (i.e. users that exceed 10TJ/day by a small amount). At present many of these large users are required to provide a yearly forecast once per year to AEMO.</p> <p>Assuming Qenos has to manually submit the data to the Gas Bulletin Board, the process could be automated by 3rd party consultants at a rough cost in the order of \$15,000 up front and \$36,000 per annum. This is not an insignificant cost for a large user.</p> <p>If the forecasting is required to be updated on a daily basis – then this would create additional costs. Similar to the above, \$15,000 upfront to automate and \$3000/month to monitor and review.</p> <p>This is a very rough guide as there are no details on how this is to be done.</p>

Number	Questions	Feedback
		Transparency re how the appropriate threshold of 10TJ/d should be made clear.. Potentially a higher threshold >10TJ/d would be more reasonable to better ensure it primarily captures LNG trains, GPG and very large users that can make a material difference to the demand side of the market balance without imposing increased compliance costs on users that only exceed the 10TJ/d threshold by a small amount.
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?	Yes
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?	A significant impact. Large gas users such as Qenos are increasingly seeking to utilise more complex and sophisticated approaches to mitigate the impact of higher gas prices. This approach requires on access to transparent information relating to gas infrastructure across eastern and northern Australia.

Number	Questions	Feedback
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.	Yes
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>	<p>Yes. Understanding the availability of capacity outlooks on infrastructure is critical to making informed strategic gas procurement decisions and ensure there is the ability for the gas to be delivered in a reliable, efficient manner.</p> <p>In addition to these measures, improved transparency of information on availability of AMDQ credits for the DWGM would also assist market participants with the increasing requirement to being able to efficiently transport gas from northern fields into Victoria.</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>Yes. As per above it will enable better informed decisions on long term gas procurement decisions and inform policymakers where gaps exist in infrastructure that may impede the efficient transportation of gas.</p>

Number	Questions	Feedback
38	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.	Yes.
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.	Yes
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.	Yes
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.	Yes
42	Do you agree the proposed extension of the time-frame for uncontracted capacity outlooks from 12 to 36 months will deliver an overall net benefit to gas market participants? (a) If so, please explain how you would use this information and the net benefit it would provide. (b) If not, please explain why.	Yes. Users are generally needing to make strategic decisions over at least a 3-5 year period.
43	Do you see value in extending the information requirement for a 36-month uncontracted capacity outlook to production facility operators that are providing third party access?	Yes

Number	Questions	Feedback
	(a) If so, please explain how you would use this information and the net benefit it would provide.	
44	Do you agree that requiring Bulletin Board compression facilities and Bulletin Board storage facilities to provide a list of users with contracted capacity for publication on the Bulletin Board will deliver an overall net benefit to gas market participants?	Yes. This should also be extended to the provision of AMDQ Credits as per response in Question 36.
45	Do you agree that the materiality threshold should be changed? If not, please explain why.	
46	Do you agree with the options that have been identified in section 7.3, or are there other options that could be considered? If you think there are other options that could be considered, please explain what the options are, what they would involve and what the advantages, disadvantages, costs, benefits and risks are with these additional options.	Yes. Plus the consideration of AMDQ credits which is an impediment to efficiently being able to move gas into the DWGM.
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</p>	Generally we favour Option 4 in order for market participants to make better informed decisions.

Number	Questions	Feedback
	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?	
48	If you think the transparency measures set out in section 7.3 should be implemented through alternative means, please explain how you envisage this would work and how this would contribute to the NGO and the Energy Council's Vision as set out in Box 1.1.	

7. Gas Statement of Opportunities (GSOO)

Number	Questions	Feedback
49	Do you agree that the GSOO should be expanded to include the Northern Territory now it is connected to the eastern and northern Australian gas markets? If not, please explain why.	Yes. Qenos is now actively moving NT gas south following the connection of the NGP and with the new day ahead auction reforms this opportunity will increase.
50	Do you agree that the current voluntary requirement for market participants to provide information to AEMO results in a poor quality of information in the GSOO? If not, please explain why.	Yes
51	Do you agree that compelling market participants to provide information required for GSOO preparation will benefit the quality of information in the GSOO? If not, please explain why.	Yes
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	Yes.

	there are other options that could be considered, please explain what the options are, what they would involve and what the advantages, disadvantages, costs, benefits and risks are with these additional options.	
53	<p>In relation to the options set out in section 8.3:</p> <p>(a) What do you think the advantages, disadvantages, costs, benefits and risks are with each option?</p> <p>(b) What incremental benefits do you think are associated with option 2?</p> <p>(c) What incremental costs do market participants expect to incur under option 2?</p> <p>(d) Are there any refinements that could be made to option 2 to reduce compliance and reporting costs, whilst also ensuring any obligations are fit for purpose and achieve the NGO and the Energy Council's Vision as set out in Box 1.1?</p>	Supportive of Option 2. It better informs users and policymakers regarding the longer term supply-demand balance which is critical in making short and long term investment decisions.
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.	

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	Refer comments in the Chemistry Australia section relating to value of gas used by the Australian chemical industry.

Number	Questions	Feedback
	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]	

Item number	Amendment	Issue	Feedback
	Part 2	Amendment of National Gas Law	
3	[Insert section and subsection reference]	[Insert section/subsection text]	
4	[Insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	

13. National Gas Regulations Amendments

Item number	Amendment	Issue	Feedback
	Part 1	Preliminary	
1	[Insert section and subsection reference]	[Insert section/subsection text]	
2	[Insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
	Part 2	Variation of National Gas (South Australia) Regulations	
3	[Insert section and subsection reference]	[Insert section/subsection text]	
4	[Insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	

14. National Gas Rules Amendments

Item number	Amendment	Issue	Feedback
	Part 15B	Procedures	
1	[insert section and subsection reference]	[Insert section/subsection text]	
2	[insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
	Part 15D	Gas statement of opportunities	
3	[insert division, section and subsection reference]	[Insert section/subsection text]	
4	[insert division, section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
	Part 17	Miscellaneous provisions relating to the AER	
5	[insert section and subsection reference]	[Insert section/subsection text]	
6	[insert section and subsection reference] [insert extra rows if necessary]	[Insert section/subsection text]	
	Part 18	Natural Gas Services Bulletin Board	

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