



1 September 2025

Australian Energy Market Commission  
Level 15  
60 Castlereagh Street  
SYDNEY NSW 2000

Email: [submissions@aemc.gov.au](mailto:submissions@aemc.gov.au)

Dear Stuart,

**ECGS Projected Assessment of System Adequacy Draft Determination and Proposed NGR Changes – Submission by GLNG Operations Pty Ltd**

GLNG Operations Pty Ltd (GLNG OPL) provides the following submission in response to the AEMC's consultation on the East Coast Gas System ST and MT Projected Assessment of System Adequacy Draft Determination and proposed NGR changes.

As noted in our earlier submission, a short term PASA, medium-term PASA, and the proposed expansion of NGR reporting will not solve the underlying structural gas supply shortfall expected from as early as 2029. The only structural reform that will solve the impending issue is to ensure more gas is made available to the domestic market. Evermore onerous changes to regulation will not prevent supply and demand imbalances. It is our view that the impact of continued delays and impediments to gas development on supply/demand balance far outweighs any perceived benefits of additional market information.

We urge the Federal government (and States) to act now to cut red tape and enable existing gas projects to move forward—especially those that can supply the southern states in the near term. The Narrabri project, for example, has committed all of its gas to the domestic market but is still stalled by bureaucratic and legal disputes. The key focus of regulatory reform in 2025 must be to promote rapid investment to ensure that the East Coast does not suffer shortfalls as soon as 2029. Once the underlying problem is mitigated and investment has returned, then regulators can turn their attention to more transparency measures in a well-supplied, functioning gas market.

We note that reforms arising from this consultation will not commence until 2027. Whilst this approach is welcomed, if the gas market is reformed through the DCCEEW and DISER Gas Market Review and gas production ready projects are fast tracked, then implementing the PASA may not be necessary and could be delayed saving significant cost to gas market participants. The actual commencement of PASA reforms should not be set now, but be reviewed once the outcome of the Gas Market Review is known.



**Streamline reporting across all government agencies must be aligned**

While we acknowledge the AEMC has considered existing data sources in developing the proposed NGR changes, we encourage the AEMC, AEMO, AER, and ACCC to continue collaborating with industry to streamline reporting, with the goal of establishing a single, unified data set for industry reporting.

GLNG provides specific comments in relation to the proposed rule changes in **Appendix 1**.

Should you have any queries in relation to the submission, please do not hesitate to contact me.

Kind regards

Yours sincerely,

*C Sutherland*

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# APPENDIX I

Reporting Obligations under Part 18	New Div 5	GLNG Comments
<b>LNG Daily Consumption- 12mth outlook for LNG Projects r.185A</b>	<p>➤ Report at the start of the week, forecast of LNG consumption for each day in the next 12 months - update for material change - in accordance with BB procedures</p> <p>Note consumption data is the volume of gas delivered to an LNG facility on a day. R.141</p>	<p>➤ This consumption data is already reported by GLNG as part of:</p> <ul style="list-style-type: none"> <li>• STCO: r178 – report daily on each gas day D-1 capacity outlook for gas day D to D+6 – includes GLNG Pipelines, plant, compression and storage</li> <li>• MTCO: r 181 – report to GBB weekly – daily capacity starting in 1 week time, includes start and end dates of matters affecting capacity, and the actual capacity during the impacted period in TJ/day for the next 24 months. This is reported for plant, pipelines, compression and storage</li> </ul> <p>➤ Rule 185A is not necessary.</p> <p>➤ Alternatively allow an exemption from reporting where the data is already provided to AEMO – addressed further on.</p>
<b>BB Shipper obligations r.185B</b>	<p>➤ Shipper must report each day to <i>BB facility operators</i> - good faith estimate of nominations for the BB shippers <u>use of the facility</u> the next gas days D+1 to D+6</p> <p>Note: BB facility means a BB production facility, a BB pipeline, a BB storage facility, a BB compression facility, a BB large user facility or an LNG processing facility. R.141</p>	<p>➤ <b>Amend rule:</b> This rule must not apply to LNG project shippers who are not third- party shippers on the LNG project pipelines, storage and compression facilities. Within GLNG, these facilities are only used by the GLNG project participants, so the data reported by the facility operator to the GBB represents the operations and use of the facility on a daily basis and does not need to be supported by a report from a shipper/user.</p> <p>➤ Further, within the GLNG project, reporting by a non-third-party shipper duplicates existing reporting that is undertaken. For example, compression storage and pipeline capacity data is already reported as part of the STCO under r 178 and MTCO r. 181. Further under r182 – 184 GLNG reports nominations and forecasts for gas days D+1 to D+6 for its pipelines, compression and storage facilities.</p>



Reporting Obligations under Part 18	New Div 5	GLNG Comments
<p><i>Gas buyer obligations r.185B</i></p>	<p>➤ Report each day in accordance with the BB procedures, to facility operator for a BB <b>production facility</b> or <b>LNG import facility</b> for which the BB gas buyer has a right to nominate supply an estimate of the buyers nominated supply for the next gas day D+1 to D+6</p> <p><b>BB Gas buyer</b> - person who holds a contractual right for supply from a BB production facility or an LNG import facility.</p>	<p>➤ GLNG DSO is a <i>gas buyer</i> from GLNG USO (operator of GLNG production facilities).</p> <p>➤ <b>Amend rule:</b> r. 185B must exclude gas sellers and buyers who are associates in the LNG project. The data reported by the production facilities for GLNG represents the actual gas supply to GLNG and does not need to be supported by a report from a downstream gas buyer.</p> <p>➤ Further, the gas demand data will be reported under r.185A (gas consumption for an LNG processing facility) so requiring this data to be reported by the GLNG DSO as Gas Buyer duplicates reporting.</p>
		<p>➤ Regarding gas demand from third party suppliers, the reporting by an LNG gas buyer to a production facility must only apply where the third-party gas supplier actually ties into LNG pipeline network, the production facility is known and there is a contract for gas supply in place.</p> <p>➤ When gas is purchased by a gas buyer from a third party and delivered to Wallumbilla (whether that be under an MGSA and/or TNs or a trade on the GTE), the buyer must be excluded from this reporting obligation because often the buyer will not know which production facility the gas comes from. Further the timing of a decision to trade is often made adhoc and cannot always be included in a report for the week ahead.</p> <p>➤ Whilst it is understood that more accurate demand information can be provided when gas buyers provide forecast nominations of their demand to production facilities, for LNG projects this will result in duplicate reporting as the demand data (consumption data) is already reported and will continue to be reported under r.185A.</p>



Reporting Obligations under Part 18	New Div 5	GLNG Comments
<i>Exemption r.164(2)</i>	<ul style="list-style-type: none"> <li>➤ AEMO may grant an exemption from the obligation to provide information under Division 5 in relation to a BB facility where AEMO is satisfied in that the information will be provided to AEMO <u>by another person</u> under this Part</li> </ul>	<ul style="list-style-type: none"> <li>➤ <b>Amend:</b> AEMO should also be able to grant a BB facility an exemption from reporting where the information to be reported is already provided to AEMO through another GBB reporting obligation under Part 18 Div 5. For example, LNG gas consumption data under the new r. 185A will be the same data that is provided through the STCO and MTCO.</li> </ul>
<i>Adhoc reporting of impacts to gas supply – 190H</i>	<ul style="list-style-type: none"> <li>➤ BBRE – other than LNG processing facility and large users to report an event/circumstance relating to the facility that affects, will/may affect the reliability of gas supply including equipment failure as soon as is reasonably practicable – is classified information</li> </ul>	<ul style="list-style-type: none"> <li>➤ There should be a gas volume threshold and time duration of impact specified in the rules or procedures that must be reached before this reporting is required.</li> <li>➤ In any event this data is captured in the STCO and MTCO for pipelines, compression and storage facilities so consider not including this rule.</li> </ul>
<i>Reporting – Rule 194</i>  <i>Data AEMO MUST report</i>	<ul style="list-style-type: none"> <li>➤ Must report aggregated data provided under: <ul style="list-style-type: none"> <li>▪ r. 179A – linepack outlooks</li> <li>▪ R. 181A – maintenance work affecting large users</li> <li>▪ r.185A - 12 month outlook for LNG export projects – daily capacity</li> </ul> </li> </ul>	Agree
<i>Information AEMO Must not publish unless de-identified and published in aggregate</i>	<ul style="list-style-type: none"> <li>➤ Information must be de-identified and published in aggregate for: <ul style="list-style-type: none"> <li>▪ r. 179A – line pack for BB pipelines</li> <li>▪ r. 181A - maintenance work affecting large users</li> <li>▪ r.185A - 12 month outlook for LNG export projects</li> </ul> </li> </ul>	Agree



Part 27 Reforms		GLNG Comments
<i>Part 27 Reforms</i>	<p>➤ <b>Creates the PASA</b></p>	<p>➤ <b>Amend rule 684</b> - Rule 684 refers to the PASA Procedures specifying the outputs to be published and the manner in which the outputs will be published.</p> <p>➤ To ensure commercially sensitive information is unidentified and reported on an aggregate basis then this section should state the Procedures must comply with rule 194.</p> <p>➤ <b>Amend r.685</b> - The MT PASA does not specifically reference that demand includes GPG demand. Whereas in r.686(2)(a) for ST PASA, GPG demand is specifically referenced. In our view GPG demand is essential to a MT PASA as GPG demand can swing the gas supply and demand balance significantly. In our view r.685 must specifically reference GPG demand for the MT PASA.</p>