

Rule determination

National Gas Amendment (ECGS Notice of closure for gas infrastructure) Rule

Proponent

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About the AEMC

The AEMC reports to the energy ministers. We have two functions. We make and amend the national electricity, gas and energy retail rules and conduct independent reviews for the energy ministers.

Acknowledgement of Country

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Summary

- 1 The Commission has made a more preferable final rule (“final rule”) to require the Australian Energy Market Operator (AEMO) to report on the closure of gas infrastructure, in response to the rule change request submitted by Energy Senior Officials on behalf of the Energy Ministers’ Sub-Group (the proponent). The final rule amends the Gas Statement of Opportunities (GSOO) provisions in Part 15D and the Victorian Gas Planning Report (VGPR) provisions in Part 19 of the National Gas Rules (NGR) to require participants to provide this information to AEMO.
- 2 While historically the closure of gas infrastructure has not been a problem, the size and scope of the energy transition could trigger closures and expose the East Coast Gas System (ECGS) to reliability threats. Prior to this rule change, infrastructure operators may have voluntarily provided notice of closure information to the market and AEMO may have chosen to report this information, but there has been no formal obligation to do so.
- 3 As such, the proponent identified a need to ensure market participants and AEMO are providing advanced notice of infrastructure closure so that the market and policymakers are able to make efficient and timely decisions which take into account any reliability and supply adequacy threats. This rule change forms part of the broader ECGS reliability and supply adequacy reform package, with the final rule enhancing the overall capability of the ECGS to anticipate and manage emerging supply risks across both operational and planning timeframes.
- 4 While the proponent’s preferred option was to amend the Bulletin Board medium-term capacity outlook provisions in Part 18 of the NGR to require infrastructure operators to report on planned permanent closures with at least 36 months’ advanced notice, our approach utilises the GSOO and VGPR, which we consider provides a more fit for purpose solution promoting the long term interests of consumers.
- 5 Taking into account the potential costs and benefits of the options proposed in the rule change request,¹ and consistent with the size of the problem and the benefits of a solution, the Commission believes introducing an obligation to provide advanced notice of closure in the planning reports to be a more appropriate solution because:
 - they are well-established reporting tools
 - they are easily accessible, understood, and readable by participants, governments, regulators, and policymakers
 - there are no substantive implementation costs, system or IT upgrades required for participants or AEMO
 - it could help avoid AEMO having to use other more interventionist tools.

Our final rule provides increased transparency to support reliability and supply adequacy for the ECGS

- 6 The Commission believes the final rule, by providing more advanced information and therefore transparency to the market, benefits market participants, governments, regulators and policymakers by providing them with more timely information on gas supply and delivery infrastructure closures in the ECGS. By further reducing information asymmetries this will enable them to respond in a more informed and efficient manner to any potential gas supply shortfalls.
- 7 Beyond AEMO, market participants and governments, the final rule provides valuable information

¹ Rule change request, p 10-13.

to infrastructure planners and investors seeking to align with Australia's energy transition. Transparent notice of infrastructure changes, including closures, fosters confidence and improves the quality of public and private sector planning.

- 8 This rule change is one of four² rule changes that together seek to extend the reliability and supply adequacy (RSA) framework for the ECGS. The intention for the extended framework is to equip AEMO and market participants with tools to respond to any threat of gas supply shortfalls.
- 9 Additionally, the Commission is actively considering the work being undertaken by the Energy and Climate Change Ministerial Council (ECMC) to further expand AEMO's gas powers to address possible structural supply shortfalls in the ECGS and how that relates to these rule change requests.³
- 10 For additional background and context on the ECGS and the four RSA rule changes, please refer to the Commission's ECGS reliability and supply adequacy rule change requests [Background Paper](#).

The final rule introduces a notice of closure obligation into the GSOO and VGPR

- 11 Up until now, while participants have provided a range of actual and forecast planning and infrastructure information under the GSOO which can be used to gather insights into permanent closures, there has been no formal obligation to give advanced notice if gas infrastructure is permanently closing.
- 12 The final rule ensures there is a formal obligation for closure information to be reported transparently and in advance. The obligation:
 - Applies to six infrastructure types that meet the Bulletin Board reporting threshold, i.e. with a nameplate rating of 10TJs/day or more, due to the impact they could have on reliability. These are:
 - Liquefied Natural Gas (LNG) import facilities
 - Production facilities
 - Pipelines
 - Compression facilities
 - Storage facilities
 - Blend processing facilities.
 - Applies to a reportable closure decision (the reporting trigger), which is the decision of a facility to permanently cease supply of covered gas services
 - Requires a reportable closure decision to be reported through the GSOO survey process. The survey is also used for the purposes of the VGPR.
 - Requires a GSOO reporting entity to inform AEMO:
 - about a reportable closure decision, where practicable, at least 36 months prior to the intended date for cessation of supply. On receipt of a reportable closure decision AEMO will be required to publish a notice on their website. In circumstances where the intended date for cessation of supply is within 36 months of the reportable closure decision, a GSOO reporting entity must provide reasons in writing to AEMO for why it has not been able to provide 36 months' notice. These reasons will be published.

2 Also see: [ECGS Reliability standard and associated settings](#), [ECGS Supplier of last resort mechanism](#), and [ECGS projected assessment of system adequacy](#).

3 Energy and Climate Change Ministerial Council, [Meetings and communiques](#), 15 August 2025.

- of a new reportable closure decision or a change to the date of previously disclosed information, if it comes forth outside a GSOO survey cycle, as soon as practicable. AEMO will then publish a notice, and will consider whether a supplement to the GSOO or VGPR is required.

The Commission has considered stakeholder feedback in making its decision

- 13 Most stakeholders have supported the intent of the notice of closure obligation, and while some stakeholders supported the obligation being reported through the Bulletin Board,⁴ the majority of stakeholders consider integrating the obligation into the planning reports to be more appropriate.⁵
- 14 Stakeholders agree that the GSOO and VGPR are readily accessible and will not impose significant additional reporting obligations or costs to upgrade systems and processes.⁶ Stakeholders supported the approach to report the obligation through the GSOO and VGPR, on this basis.
- 15 The key stakeholder observations in response to the consultation paper and draft determination that shaped our rule include:
- That the rule will increase transparency and provide more timely and efficient responses from participants and governments⁷
 - The potential for material reliability impacts is contingent on the size of the infrastructure; smaller infrastructure is less likely to have a material effect on reliability, therefore the obligation should only apply to infrastructure that materially impacts system outcomes⁸
 - Entities that make a decision to permanently cease supplying covered gas services within the 36 months notification period, due to factors such as a change in the nature of the facility, should not be penalised.⁹
- 16 **We have provided further clarity in the final determination in response to stakeholder feedback**
- 17 AEMO requested clarity on the application of the rule to blended gas distribution systems noting that the AEMC's draft determination stated it would not apply to distribution networks.¹⁰ The Commission has clarified that the intent of the obligation is to require information from infrastructure that could materially impact the reliability and supply adequacy of gas to customers. Therefore, blended gas distribution systems have been removed from the final rule.
- 18 AEMO and EUAA suggested expanding the scope of the rule to include subcomponents which could be critical or could materially impact the ECGS if they closed.¹¹ The Commission is of the view, in line with broader stakeholder feedback, that the infrastructure captured by this obligation should be large enough to materially impact the ECGS if it permanently ceases supply of covered gas services. Therefore, the obligation in the final rule falls at facility level, not subcomponents, because this gives a clearer indication of the changing market conditions. Additionally, information on the potential closure of subcomponents can be made available through the two-year medium capacity outlook.
- 19 AGL and APA questioned the need to report new closure decisions outside of the established

4 Submissions to the consultation paper: Shell, p 1; AEC, p 1; Origin, p 2; Jemena p 1; submission to the draft determination, EUAA, p 1.

5 Submissions to the consultation paper: APLNG, p 2; Epic Energy, p 3; APA, p 15; AGL, p 4; Jemena, p 1; submissions to the draft determination: APGA, p 1; APA, p 1; APLNG, p 1; AGL, p 1.

6 Submissions to the draft determination: APGA, p 1; APA, p 2; APLNG, p 1; AGL, p 1.

7 Submission to the consultation paper, APA, p 14; Submission to the draft determination, AEMO, p 1.

8 Submissions to the consultation paper: AGL, p 2-3; Shell, p 2.

9 Submissions to the consultation paper: APA, p 14; Jemena, p 1-2.

10 Submission to the draft determination, AEMO, p 1.

11 Submissions to the draft determination: AEMO, p 1; EUAA, p 1.

GSOO survey cycle.¹² EUAA also requested clarity on when reporting entities are meant to notify AEMO about its intent to close, and also raised timing considerations around when the information is to be published in the planning reports.¹³ The Commission considers the intent of the obligation is to encourage timely and transparent reporting of closures to allow the market time to respond efficiently to any potential reliability threats. As a result, we consider it necessary to include a mechanism for information to be made available outside of the annual GSOO survey process where new reportable closure decisions or changes to decisions are made. To further improve the timely provision of information to the market, we have included a new provision in the final rule to require AEMO to publish a notice on its website once a reporting entity has indicated a reportable closure decision at any point, including in the GSOO survey process. If information is reported to AEMO within 36 months the reporting entity must provide reasons in writing for why it has not been able to provide at least 36 months' notice.

- 20 AEMO requested clarification of roles in the Declared Transmission System (DTS) to ensure responsibilities to report align where the reporting entity (AEMO) is not the facility owner.¹⁴ The Commission agrees that the intent of the obligation is to ensure that the reporting entity has the required information. Therefore, the Commission has clarified in the final rule that registered participants who are the declared transmission system service provider for DTS facilities have an obligation to report to AEMO.
- 21 AEMO also requested transitional arrangements for it to consider a reportable closure decision in the 2026 planning reports and update the GSOO Procedures.¹⁵ The Commission considers that transitional arrangements to update the GSOO Procedures are justified in order to provide clarity to stakeholders. The Commission also considers that any reporting entity that responds to the 2026 GSOO survey prior to 18 September 2025 must update its survey response to account for this Amending rule.
- 22 Additionally, while supportive of the obligation being in the planning reports, EUAA also advocated for strengthening the obligation to reflect the National Electricity Market (NEM) Generator Three Year Notice of Closure arrangements,¹⁶ to ensure strict compliance with the obligation. The Commission considers the costs of a NEM style framework would outweigh the benefits of the obligation. Unlike the NEM framework which was designed to provide transparency around the impending closure of thermal plant, this obligation is intended to be another tool for market participants, governments, and policymakers to manage reliability and supply adequacy of the ECGS throughout the energy transition. Additionally, while the obligation in the final rule requires timely disclosure at the point a reportable closure decision is made, the closure of gas infrastructure is expected to occur infrequently. Further, we consider that existing civil penalties for GSOO non-disclosure are sufficient.
- 23 We consider that the approach outlined in the final rule is proportionate and fit-for-purpose, taking into account the benefits and costs of introducing an advanced notice of closure obligation. The obligation also takes into account other reporting obligations and regulatory changes underway as part of the RSA stage 2 reforms, and other broader ECGS reforms.

¹² Submissions to the draft determination: AGL, p 1-2; APA p 2.

¹³ Submission to the draft determination, EUAA, p 1-2.

¹⁴ Submission to the draft determination, AEMO, p 2.

¹⁵ Submission to the draft determination, AEMO, p 1-2.

¹⁶ AEMC, Generator three year notice of closure, Rule determination, 8 November 2018.

We assessed our rule against three assessment criteria using regulatory impact analysis and stakeholder feedback

- 24 The Commission has considered the NGO¹⁷ and the issues raised in the rule change request and assessed the final rule against three assessment criteria outlined below. We gathered stakeholder feedback and undertook analysis in relation to these criteria.
- 25 The final rule contributes to achieving the NGO by:
- **Promoting safety, security, and reliability:** by providing more transparency for governments, market participants, and policymakers, a notice of closure obligation helps promote reliability. While historically the closure of gas infrastructure has not been a problem, the energy transition could trigger some permanent closures and expose the ECGS to reliability threats. The final rule ensures market participants and AEMO are providing advanced notice of infrastructure closure to ensure the market and policymakers are making efficient and timely decisions to take into account any reliability and supply adequacy threats. The Commission believes that in the long-term this will also benefit consumers by helping ensure ECGS participants are efficiently managing any reliability threats in a least cost way.
 - **Aligning with principles of market efficiency:** by introducing an obligation to report on closures through the planning reports, the final rule increases information transparency and reduces information asymmetries in the ECGS. Improving information transparency improves confidence, certainty, and efficiency in decisions about planning and investing in gas infrastructure. It also improves consistency through increased alignment of gas information across available reporting tools, providing the market, governments, and policymakers with clear information on the decisions made by reporting entities.
 - **Considering principles of good regulatory practice:** the final rule considers the broader direction of reforms associated with the ECGS and ensures the notice of closure obligation interacts constructively with them, including that no requirements are unduly replicated. As such the final rule ensures that the benefit provided by the obligation is commensurate with the solution (reporting through the GS00 and VGPR).

The final rule commences on 18 September 2025 and includes reportable closure decisions from the 2026 reporting year

- 26 The final rule, and the obligation on GS00 reporting entities to notify AEMO of any reportable closure decision either through the GS00 survey or an update, commences on 18 September 2025, so that the information can be made available in the 2026 GS00 and VGPR.
- 27 While the primary reporting mechanism is intended to be the GS00 survey, in any instance that AEMO has finalised its GS00 survey process for 2026, the GS00 reporting entity still has an obligation under the final rule to notify AEMO if there is a reportable closure decision.
- 28 Despite the obligation commencing when the final rule commences, to provide absolute certainty to participants about the requirements of the process for a GS00 survey, we have clarified in the final rule that AEMO must update its GS00 Procedures no later than 5 March 2026.¹⁸
- 29 Importantly the Commission considers that any reporting entity that responds to the 2026 GS00 survey prior to 18 September 2025 must update its survey response to account for this Amending rule.

¹⁷ Section 23 of the NGL.

¹⁸ Schedule 2 of the Final rule, Part 21, Division 1, rule 108.

Key differences between draft rule and final rule

30 The key differences include:

- Removing blended gas distribution systems from the obligation because the intent of the final rule is to require information from infrastructure that could materially impact the reliability and supply adequacy of gas to customers. In the ECGS, these facilities are “upstream” of the citygate, whereas blended gas distribution systems are pipelines beyond the citygate
- On receipt of a GSOO survey response identifying a reportable closure decision, AEMO will publish a notice on its website notifying the market of the reportable closure decision in order to ensure the market receives timely notification. This is a change from the draft rule in the final rule in response to stakeholder feedback
- Ensuring responsibilities to report a reportable closure decision align from the facility owner to the reporting entity (AEMO) in the Victorian Declared Transmission System (DTS)
- Providing certainty to stakeholders by including transitional arrangements for AEMO to update the GSOO Procedures.

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1 The Commission has made a final determination to require AEMO to report on planned closures of gas infrastructure

The Australian Energy Market Commission (the Commission or AEMC) has made a final rule in response to a rule change request submitted by Energy Senior Officials on behalf of the Energy Ministers' Sub-Group (the proponent), which sought to amend the medium-term capacity outlook in the National Gas Rules (NGR) for the Gas Bulletin Board to capture planned closures of gas infrastructure for the East Coast Gas System (ECGS).

This chapter provides an overview of the Commission's final rule and rationale.

- Section 1.1 outlines the final determination and final rule
- Section 1.2 outlines the input from stakeholders that shaped our final determination
- Section 1.3 explains how our determination supports reliability for the ECGS
- Section 1.4 explains how our determination supports and complements broader gas reliability and supply adequacy reforms

1.1 Our final rule amends the GSOO and VGPR

The final rule makes a more preferable rule to amend the Gas Statement of Opportunities (GSOO) provisions in Part 15D and the Victorian Gas Planning Report (VGPR) provisions in Part 19 of the NGR to introduce an obligation to require AEMO to report on the closure of gas infrastructure with at least 36 months' advanced notice where practicable.

The key features of the notice of closure obligation include:

- It applies to six infrastructure types (facilities) that meet the Bulletin Board reporting threshold, i.e. with a nameplate rating of 10TJs/day or more, due to the impact they could have on reliability (see section 3.1.1). These include:
 - LNG import facilities
 - Production facilities
 - Pipelines
 - Compression facilities
 - Storage facilities
 - Blend processing facilities
- It applies to a reportable closure decision (the reporting trigger) which is the decision of a facility to permanently cease supply of covered gas services - see section 3.1.2
- The obligation is to be reported by GSOO reporting entities to AEMO through the GSOO survey - see section 3.3.
- It requires at least 36 months' advanced notice where practicable - see section 3.2.
- It requires reporting entities to provide closure information to AEMO in circumstances where a decision is made to permanently cease supplying gas at any time outside of a GSOO survey cycle, including within 36 months. If this occurs within 36 months, reasons must be provided in writing why it has not been practical to provide at least 36 months' notice. This information will be published by AEMO. See section 3.2.1

The final rule also ensures that registered participants who are the declared transmission system service provider for DTS facilities have an obligation to report to AEMO - see section 3.3.1.

The Commission believes that the main benefits of introducing the obligation into the GSOO and the VGPR are:

- they are well-established reporting tools
- they are easily accessible and well understood by participants, governments, regulators, and policymakers
- there are no substantive implementation costs, system, or IT upgrades required for participants or AEMO
- it provides the market with an additional tool which could help prevent AEMO from having to use other more interventionist tools.

See chapter 2 for more information.

We have made some changes from the draft rule to clarify the requirements of the obligation

Changes to the final rule from the draft rule include:

- Removing blended gas distribution systems from the obligation to report notice of closure because the intent of the final rule is to require information from infrastructure that could materially impact the reliability and supply adequacy of gas to customers. In the ECGS, these facilities are “upstream” of the citygate whereas blended gas distribution systems are pipelines beyond the citygate, see section 3.1.1
- On receipt of a GSOO survey response identifying a reportable closure decision, AEMO will publish a notice on its website notifying the market of the reportable closure decision in order to ensure the market received timely notification. This is a change from the draft rule in the final rule in response to stakeholder feedback, see section 3.3.1
- Ensuring responsibilities to report a reportable closure decision align from the facility owner to the reporting entity (AEMO) in the DTS
- Providing certainty to stakeholders by including transitional arrangements for AEMO to update the GSOO Procedures, see section 3.4.

1.2 Our determination provides increased transparency to support reliability and supply adequacy of the ECGS

The Commission believes the final rule, by providing more advanced information and therefore transparency to the market, benefits market participants, governments, regulators, and policymakers by providing them with more timely information on gas supply and delivery infrastructure closures in the ECGS. This transparency helps to further reduce information asymmetries, which helps enable participants to respond in an informed and efficient manner to any potential gas supply shortfalls. It also supports improved forecasting for the GSOO and VGPR, and the proposed gas Projected Assessment of System Adequacy (PASA) tool (being considered in a separate rule change¹⁹) further enabling more informed and efficient planning and investment decisions.

While the proponent considered that reporting gas infrastructure closures through the Bulletin Board would provide the greatest transparency, the Commission believes the potential costs of implementation, such as changes to reporting systems, and continual reporting requirements, associated with the Bulletin Board outweigh the benefits of a notice of closure obligation. Importantly, both the proponent and stakeholders believe that infrastructure closures are expected to occur relatively infrequently, therefore the Commission considers that reporting closures

¹⁹ [ECGS Projected Assessment of System Adequacy](#).

through the GSOO and VGPR will provide just as much transparency and timely information to the market as the Bulletin Board, without imposing undue reporting requirements on participants. See section 2.3.

1.3 Stakeholder feedback and support for a fit-for-purpose notice of closure obligation shaped our determination

Most stakeholders have supported the intent of the notice of closure obligation, and while some stakeholders initially supported the obligation being reported through the Bulletin Board,²⁰ the majority of stakeholders consider integrating the obligation into the planning reports to be more appropriate.²¹ Stakeholders agree that the GSOO and VGPR are readily accessible and will not impose significant additional reporting obligations or costs to upgrade systems and processes.²² Stakeholders supported the approach taken to report the obligation through the GSOO and VGPR, on this basis. See section 3.3.

The key stakeholder observations in the consultation paper and draft determination that shaped our rule include:

- That the rule will increase transparency and provide more timely and efficient responses from participants and governments²³
- The potential for material reliability impacts is contingent on the size of the infrastructure. Smaller infrastructure is less likely to have a material effect on reliability, therefore the obligation should only apply to infrastructure that materially impacts system outcomes²⁴
- Entities that make a decision to close within the 36 months notification period, due to factors such as a change in the nature of the facility, should not be penalised.²⁵

Some stakeholders in their submissions to the draft determination requested further clarity on the application of the rule to:

- blended gas distribution systems, noting that the AEMC's draft determination stated it would not apply to distribution networks²⁶
- subcomponents that are critical or could materially impact the ECGS if they closed²⁷
- reporting new closure decisions outside of the established GSOO and VGPR survey cycle²⁸
- when reporting entities are meant to notify AEMO about their intent to close, and timing considerations around when the information is published in the planning reports²⁹
- the DTS where the reporting entity (AEMO) is not the facility owner³⁰
- transitional arrangements for AEMO to consider information in the 2026 planning reports and update the GSOO Procedures³¹

20 Submissions to the consultation paper: Shell, p 1; AEC, p 1; Origin, p 2; Jemena p 1.

21 Submissions to the consultation paper: APLNG, p 2; Epic Energy, p 3; APA, p 15; AGL, p 4; Jemena p 1; submissions to the draft determination: APGA, p 1; APA, p 1; APLNG, p 1; AGL, p 1.

22 Submissions to the draft determination: APGA, p 1; APA, p 2; APLNG, p 1; AGL, p 1.

23 Submission to the consultation paper, APA, p 14; Submission to the draft determination, AEMO, p 1.

24 Submissions to the consultation paper: AGL, p 2-3; Shell, p 2.

25 Submissions to the consultation paper: APA, p 14; Jemena, p 1-2.

26 Submission to the draft determination, AEMO, p 1.

27 Submissions to the draft determination: AEMO, p 1; EUAA, p 2.

28 Submissions to the draft determination: AGL, p 1-2; APA, p 2.

29 Submission to the draft determination, EUAA, p 1-2.

30 Submission to the draft determination, AEMO, p 2.

31 Submission to the draft determination, AEMO, p 1-2.

Additionally, while supportive of the obligation being in the planning reports, EUAA also advocated for strengthening the obligation to reflect the National Electricity Market (NEM) Generator Three Year Notice of Closure arrangements³², in order to ensure there would be strict compliance with the obligation. Specifically, they requested that:

- a strict 36 month notice period should be enforced, with the AER tasked with developing an exemptions framework
- civil penalties for non-compliance should be included.

The Commission has considered stakeholder feedback and is of the view that:

- The infrastructure captured by the obligation should be infrastructure that is large enough to materially impact the ECGS if it permanently ceases supply. This includes six facilities that meet the materiality threshold of having a nameplate rating of 10 TJs/day or more. See section 3.1.
- The obligation should apply at facility level and not to subcomponents, as this gives a clearer indication of changing market conditions because of the dynamic nature of asset management and information available through the two-year medium capacity outlook. See section 3.1.1
- Where a decision is made to cease supply of covered gas services:
 - *at least* 36 months in advance, the information should be reported to AEMO to notify the market, see section 3.2.
 - *within* 36 months of closing the information should be reported to AEMO to notify the market with reasons in writing for why it has not been able to provide 36 months' notice. See section 3.2.1.
- The obligation is to be reported by GSOO reporting entities to AEMO through the GSOO survey. See section 3.3.
- Registered participants who are the declared transmission system service provider for DTS facilities have an obligation to report to AEMO. See section 3.3.1.
- Transitional arrangements to update the GSOO Procedures are justified in order to provide clarity to stakeholders, however the Commission considers that any reporting entity that responds to the 2026 GSOO survey prior to 18 September 2025 must update its survey response to account for this Amending rule. See section 3.4.
- The Commission considers the costs of a NEM style framework would outweigh the benefits of the obligation. Unlike the NEM framework which was designed to provide transparency around the impending closure of thermal plant, this obligation is intended to be another tool for market participants, governments, and policymakers to manage reliability and supply adequacy of the ECGS throughout the energy transition. Additionally, the closure of gas infrastructure is expected to occur infrequently. The Commission considers the obligation encourages timely disclosure at the point a reportable closure decision is made. See section 3.2.1
- There are existing civil penalties for GSOO non-disclosure, therefore additional penalties are not required. See section 3.3.3.

32 AEMC, Generator three year notice of closure, Rule determination, 8 November 2018.

1.4 Our determination supports and complements broader gas, and reliability and supply adequacy reforms

Planning for the role of gas is a key challenge and opportunity for the energy transition

The Commission believes that one of the key challenges and opportunities we need to consider during the energy transition is planning for the role of gas. The Commission is of the view that transition planning for gas in Australia's energy system must account for consumers, networks, exports, and wholesale market impacts, with one of the challenges being certainty for investors, households, and industry.³³

This rule change is part of stage 2 of the RSA framework reforms

The ECGS notice of closure for gas infrastructure rule change is one of four³⁴ rule changes that together seek to extend the reliability and supply adequacy (RSA) framework for the ECGS. The proponent's intention for the Stage 2 reforms is to equip AEMO and market participants with additional tools to respond to any threat of gas supply shortfalls.

Following changes to the National Gas Law (NGL) in early 2023, RSA Stage 1 reforms were implemented to give AEMO powers to manage impending risks of gas shortfalls forecast for winter 2023.³⁵ Since its implementation, Energy Ministers considered that additional changes in the NGL were needed to address reliability risks in the short, medium, and long term. As such, in December 2023, Ministers directed Senior Energy Officials to progress a package of reforms to implement the Stage 2 RSA framework.³⁶

This final rule enhances the overall capability of the ECGS to anticipate and manage emerging supply risks across both operational and planning timeframes.

The Commission is consulting on Dandenong LNG interim arrangements

The EUAA requested clarity on how the obligation would operate for interlinked facilities with multiple owners, such as Dandenong³⁷ whereby the storage facility would be captured by the obligation but the liquefaction facility, critical to the operation of the storage facility, would not.³⁸ The Commission is considering how to address this gap in the Dandenong arrangements through a separate rule change process.

On 7 August 2025, the Commission published a draft determination and draft rule on the extension of the Declared Wholesale Gas Market (DWGM) Dandenong LNG interim arrangements.³⁹ The draft rule recognises that the separate ownership of the Dandenong storage and liquefaction facilities (APA and BOC respectively) creates a risk that inaccurate or incomplete information relevant to the operation of the storage facility (i.e. refill capacity) may be reported on the Bulletin Board.

The Commission's draft rule seeks to address these gaps by permanently extending the Part 18 Bulletin Board reporting obligations, the Part 19 DWGM participant information disclosure obligations, and the Part 19 maintenance reporting and coordination obligations to the Dandenong liquefaction facility. The extension of these obligations would:

33 AEMC, A consumer-focused net zero energy system, September 2024, p 25-26.

34 The other RSA stage 2 rule changes include: ECGS [reliability standard and associated settings](#); ECGS [projected assessment of system adequacy](#); ECGS [supplier of last resort mechanism](#).

35 For more details on Stage 1 RSA gas reforms, please see Chapter 3 of the AEMC's [background paper](#).

36 For more details on other rule change requests that form part of the extended framework, please see Chapter 1 of the AEMC's [background paper](#).

37 See figure 1.2 in: AEMC, [Extension of DLNG arrangements](#), consultation paper.

38 Submission to the draft determination, EUAA, p 1-2.

39 AEMC, Extension of the DWGM Dandenong LNG interim arrangements, Draft rule determination, 7 August 2025.

- enable market participants and AEMO to make more informed and efficient decisions about their use of the Dandenong storage facility and LNG stock
- support the efficient operation of the Dandenong liquefaction facility, the Dandenong storage facility, and other DWGM facilities by enabling maintenance to be more efficiently coordinated across facilities, and
- bring the Dandenong storage facility into line with the treatment of other LNG storage facilities by addressing a gap in the current arrangements arising out of the separate ownership of the storage and liquefaction facilities.

The Commission is actively considering the ECMC's work to expand AEMO's powers to address supply issues

Additionally, the Commission is actively considering the work being undertaken by the Energy and Climate Change Ministerial Council (ECMC) to further expand AEMO's gas powers to address possible structural supply shortfalls in the ECGS and how that relates to these rule change requests. The ECMC has tasked Senior Officials to work with AEMO to address ECGS supply issues and recommend policy options to address this over the medium term. The proposed powers would⁴⁰:

- only be used as a last resort (i.e. a material threat to the reliability or adequacy of supply in the ECGS is identified that can only be resolved through use of the powers)
- enable Ministers from directly affected jurisdictions to determine whether the powers are used, the scope of competitive tenders and the types of solutions that should be prioritised
- require AEMO to provide robust analysis to Ministers on the impacts of options including, to the extent possible, analysis on the longer term impact on gas prices in the East Coast Gas Market revealed through competitive tenders to support decision-making;
- include an equitable cost recovery mechanism
- preserve market incentives to invest.

On 15 August 2025, the ECMC agreed that officials will finalise a draft regulatory package (Bill, Rules, and Regulations) for Ministers' consideration no later than December 2025, followed by consultation and final consideration no later than mid February 2026.⁴¹

40 ECMC communique, 15 August 2025, p 3.

41 [ECMC communique](#), 15 August 2025, p 3.

2 The rule contributes to the energy objectives

This chapter sets out how our final rule promotes the National Gas Objective (NGO). It explains how our final rule promotes the safety, security, and reliability of the gas system. This includes how it is aligned with principles of market efficiency, while also considering principles of good regulatory practice.

In this chapter:

- Section 2.1 outlines the NGO test that the Commission must apply to make a final rule
- Section 2.2 considers how the rule applies in Western Australia
- Section 2.3 explains how our final rule contributes to the NGO

2.1 The Commission must act in the long-term interests of energy consumers

The Commission can only make a rule if it is satisfied that the rule will or is likely to contribute to the achievement of the relevant energy objectives.⁴²

For this rule change, the relevant energy objective is the NGO:

The NGO is:⁴³

to promote efficient investment in, and efficient operation and use of, covered gas services for the long term interests of consumers of covered gas with respect to—

- (a) price, quality, safety, reliability and security of supply of covered gas; and
- (b) the achievement of targets set by a participating jurisdiction—
 - (i) for reducing Australia’s greenhouse gas emissions; or
 - (ii) that are likely to contribute to reducing Australia’s greenhouse gas emissions.

The targets statement, available on the AEMC website, lists the emissions reduction targets to be considered, as a minimum, in having regard to the NGO.⁴⁴

There are also a number of relevant legal requirements for the Commission to consider under the NGL to make a final determination. These are set out in appendix B.

2.2 We must also take these factors into account

2.2.1 We have considered whether to make a more preferable rule

The Commission may make a rule that is different, including materially different, to a proposed rule (a more preferable rule) if it is satisfied that, having regard to the issue or issues raised in the rule change request, the more preferable rule is likely to better contribute to the achievement of the NGO.⁴⁵

For this rule change, the Commission has made a more preferable final rule (“final rule”). The reasons are set out in section 2.3 below.

⁴² Section 291(1) of the NGL.

⁴³ Section 23 of the NGL.

⁴⁴ Section 72A(5) of the NGL.

⁴⁵ Section 296 of the NGL.

2.2.2 We have considered how the rule applies in Western Australia

We have considered how the rule would apply in Western Australia.

In developing the final rule, the Commission has considered how it should apply to Western Australia according to the following questions:

- Does the AEMC have a relevant rule-making power? Yes, the final rule falls within the subject matters about which the Commission may make rules under the National Gas Access (WA) Act 2009.
- Is the AEMC amending parts of the NGR that apply in Western Australia? No, the final rule amends Part 15D and Part 19 of the NGR, which do not apply in the Western Australian version of the NGR.

Accordingly, the final rule will not apply in Western Australia.

See appendix B for more detail on the legal requirements for a decision.

2.3 Our final rule introducing a notice of closure obligation for gas infrastructure contributes to the achievement of the NGO

The Commission considered how to address the potential closure of gas infrastructure, influenced by the pace of the energy transition, and its impact on reliability and supply adequacy against the legal framework.

The Commission used the following **three** criteria to assess whether the proposed rule change will better contribute to achieving the NGO compared to the status quo or other rules-based options:

- **Safety, security, and reliability:** we have considered whether introducing a notice of closure obligation for gas infrastructure will help enable a safe, secure, and reliable gas system that will be in the long-term interests of consumers by ensuring the ECGS is fit for purpose throughout the energy transition.
- **Principles of market efficiency:** we have considered if providing advanced notice of gas infrastructure closures to market participants will increase transparency by further reducing information asymmetry and improving confidence, certainty, and efficiency in decisions about planning and investing in gas infrastructure in the ECGS.
- **Principles of good regulatory practice:** we have considered how the rule change will interact with other reforms in the RSA framework (stage 1 and 2) package, and the broader direction of other gas reforms and regulations.

These assessment criteria reflect the key impacts – costs and benefits – of the rule change, within the scope of the NGO. Our reasons for choosing these criteria are set out in section 4.2 of the consultation paper.⁴⁶

Following stakeholder feedback to the consultation paper and draft determination the Commission is satisfied that the assessment criteria are fit for purpose. APLNG recommended we consider the cumulative reporting impact on participants and possible duplication with any recent gas reforms and existing regulatory instruments when designing the notice of closure obligation.⁴⁷ The Commission considers this has been contemplated under the criterion ‘principles of good regulatory practice’, where we have considered the broader direction of reforms under the RSA framework as well as other recent gas reforms.

⁴⁶ AEMC, [ECGS Notice of closure for gas infrastructure](#), Consultation paper, 20 March 2025.

⁴⁷ Submission to the consultation paper, [APLNG](#), p 5.

The rest of this section explains how the final rule best promotes the long-term interest of consumers when compared to other options and assessed against the criteria.

We also note that the rule supports broader energy transition planning by providing early insights into infrastructure changes that may reflect shifts in market dynamics or emissions policies.

2.3.1 The final rule promotes safety, security, and reliability

The Commission considers introducing an obligation for AEMO to report, in advance, on the closure of gas infrastructure in its planning reports (GSOO and VGPR) provides more transparency for governments, participants, policymakers, and market; therefore helping promote reliability in the ECGS.

Reliability in the ECGS is about managing gas availability to ensure gas demand is met. It is intrinsically linked to supply adequacy, which requires having sufficient gas supplied from facilities such as production, LNG import, and storage facilities, and having sufficient infrastructure capacity to deliver gas, through pipelines, in order to meet demand on any given day.

While historically the closure of gas facilities and infrastructure has not been a problem, the size and scope of the energy transition could trigger closures and expose the ECGS to reliability threats. Previously, while infrastructure and facilities could have voluntarily notified the market in advance of closure, and AEMO may have chosen to report this information, there was no formal obligation to do so. The proponent and stakeholders have noted that new gas projects can take three to five years from inception to commissioning,⁴⁸ as such there was a need to ensure market participants and AEMO are providing sufficient advanced notice of infrastructure closures. By having sufficient notice the market and policymakers will have more information to help make efficient decisions when considering reliability and supply adequacy threats in the ECGS.

While the proponent preferred reporting the obligation through the Bulletin Board, stakeholders noted that the Bulletin Board solution would require participants and AEMO to undertake IT and system changes, and due to the nature of the medium term capacity report functionality participants would be required to continuously report this obligation.⁴⁹ Notwithstanding the possibility that the energy transition could result in an increase in closures compared to recent experience, closures are still expected to occur relatively infrequently. Stakeholders considered the costs of this approach to capture an infrequent change would substantially outweigh any reliability benefits provided.⁵⁰ Stakeholders affirmed their support for the obligation to be reported through the planning reports.⁵¹

In considering stakeholder feedback the Commission believes the final rule which introduces a requirement for AEMO to publish a notice on its website and substantively report on the closure of gas infrastructure in the GSOO and VGPR better meets the assessment criterion than the proponent's original proposal to report it in the Bulletin Board. This is because there are no substantive implementation costs, or IT and system upgrades required for participants or AEMO since the reporting is integrated into the existing GSOO survey and publication process - see section 3.3. By requiring AEMO to publish a notice on its website (of a reported closure) when it is made known to AEMO in response to a GSOO survey further ensures timely notification. Therefore, the more preferable final rule is designed to ensure governments, participants, and the market are

48 [Rule change request](#), p 9.

49 Submissions to the consultation paper: APLNG, p 1; Epic Energy p 2; APA p 15.

50 Submissions to the consultation paper: APA, p 15; APLNG, p 1.

51 Submissions to the draft determination: APA, p 1; APLNG, p 1; APGA, p 1; AGL, p 1.

notified of any infrastructure closures and are able to efficiently manage any reliability threats without undue regulatory burden.

Additionally, the final rule captures infrastructure with a nameplate rating of 10 TJs/day or more because it is large enough to have a noticeable impact on reliability. Having the obligation fall on infrastructure of this size provides a more accurate picture of gas production (supply) and transmission (delivery).

The Commission does not believe the obligation should fall on subcomponents because:

- the nature of gas infrastructure is complex. For instance, the retirement of individual wells or fields is primarily determined by geological and geophysical characteristics and therefore technically complex to determine,⁵² an individual well or field closing does not necessarily imply that a production facility is ceasing production
- AEMO is able to gain visibility of the impending closure of subcomponents through the two year medium-term capacity outlook,⁵³ and the ST and MT PASA rule change, if made, could further extend the quality of information available⁵⁴
- The *Extension of DLNG arrangements* draft rule would require the Dandenong liquefaction facility to be subject to the same participant disclosure obligations as other DWGM facility operators on a permanent basis which would address stakeholder concerns in relation to that facility⁵⁵
- the closure of gas infrastructure is expected to occur infrequently⁵⁶

On balance, having regard to broader benefits provided to the market, this reporting threshold provides a reasonable benchmark to assess whether there are any reliability and supply adequacy threats posed by the infrastructures' closure. Infrastructure of this size are already facilities reported on by GS00 reporting entities - see table 3.1.

Linking the decision made by the facility to close to the decision to cease supply of covered gas services (see section 3.1.2) provides the market and policymakers with maximum advance notice to respond to any reliability or supply adequacy threats while the infrastructure may not yet have completely closed or been decommissioned.

Introducing an advanced notice of closure obligation provides another tool for participants and AEMO to help avoid the risk of inefficient decisions in planning for and investing in gas infrastructure.

The Commission also considers this benefits consumers in the long-term by helping ensure ECGS participants are efficiently managing any reliability threats, in a least cost way, throughout the energy transition. By ensuring timely notification of closure intentions, the final rule helps enhance AEMO's ability to forecast and signal potential shortfalls. This helps facilitate more cost-effective, market-led responses that minimise the need for government or regulatory intervention, thereby reducing system-wide costs passed on to consumers.

52 Submission to the consultation paper, AEC, p 1.

53 AEMO submission to the draft determination, p 1.

54 Draft determination, [ECGS Projected Assessment of System Adequacy](#).

55 AEMC, Draft rule determination, [Extension of DLNG arrangements](#), 7 August 2025.

56 Rule change request, p 20.

2.3.2 The final rule is aligned with principles of market efficiency

The Commission considers the introduction of an obligation to report on notice of closure through the planning reports is aligned to principles of market efficiency as it will increase information transparency and reduce information asymmetry in the ECGS.

Improving information transparency through an advanced notice of closure requirement helps improve confidence, certainty, and efficiency in decisions about planning and investing in gas infrastructure. It also improves consistency through increased alignment of gas information across available reporting tools, providing the market, governments, and policymakers with clear information on the decisions made by reporting infrastructure.

Information asymmetries across the ECGS create challenges in accurately forecasting supply adequacy and may reduce the value of the information to market participants. For example, the infrastructure owner or AEMO might be aware of the closure date, but other market participants may not be aware. Under the final rule, this information asymmetry is removed, ensuring all market participants, and stakeholders more generally, are aware of the closure date for infrastructure.

Importantly the final rule, by providing more transparency and further reducing information asymmetries, also reduces the risk of reliance on AEMO to intervene, which can be costly and undermine efficient market-led responses.

The proponent is of the view that reporting gas infrastructure closures through the Bulletin Board would provide the greatest transparency and that unlike the planning reports, which are only published annually, the market would benefit from information on the Bulletin Board because it can be published continuously.⁵⁷

Further, in response to the draft determination EUAA considered that:

- the obligation should be strengthened to reflect the NEM Generator Three Year Closure Rule to ensure strict compliance with the notice timeframe⁵⁸
- the rule did not go far enough to ensure compliance and could be subject to gaming.⁵⁹

The Commission believes the necessary system upgrades and continual reporting requirements associated with the Bulletin Board, and the costs of an AER enforcement or compliance mechanism and corresponding exemptions framework (similar to the NEM) outweighs the benefits. Further, the final rule has addressed the annual publication issue by requiring GSOO reporting entities to notify AEMO, in the circumstances a decision is made to cease supplying gas outside of the GSOO survey cycle, and for AEMO to publish a notice on its website - see section 3.2. The Commission considers that reporting closures through the GSOO and VGPR provides the greatest transparency to the market without requiring potentially costly system upgrades or continual reporting. Most stakeholders agree with this position and have expressed a preference for an obligation that minimises reporting requirements.⁶⁰

The Commission considers the risk the obligation will be subject to manipulation or gaming to be low because:

- closures are expected to occur infrequently
- directors have responsibilities, obligations, and disclosure obligations under other laws

⁵⁷ Rule change request, p 12-13.

⁵⁸ Submission to the draft determination, EUAA p 2-3.

⁵⁹ Submission to the draft determination, EUAA, p 2.

⁶⁰ Submissions to the final determination: APGA, p 1; APA, p 1; APLNG, p 1, AGL, p 1.

- reporting entities are subject to other reporting requirements in which information that could be useful to the market regarding facility performance or behaviour can become known, i.e. Bulletin Board, and, if made, the gas PASA⁶¹
- there are existing civil penalty provisions that apply to GSOO reporting entities. See section 3.3.3.

2.3.3 The final rule considers principles of good regulatory practice

The Commission considers that the notice of closure obligation takes into consideration principles of good regulatory practice by ensuring it interacts constructively with other gas reforms. The final rule considers the broader direction of reforms associated with the ECGS's RSA framework (stage 1 and 2) and other gas reforms.⁶² See section 1.4 for more information.

In line with stakeholder feedback⁶³ the Commission has considered how the notice of closure obligation will interact with the RSA stage 1 reforms⁶⁴ and the other three rule changes associated with the stage 2 reforms.⁶⁵ Together the RSA reforms seek to further equip AEMO and market participants with tools to respond to any threat of gas supply shortfalls. The Commission is satisfied that there is no undue duplication or unintended consequences of the notice of closure obligation with other gas reforms, rather it is a complementary tool. For instance notice of closure will support improved forecasting of the proposed gas PASA tool.⁶⁶

Under the final rule, the advanced notice of closure reporting obligation is designed to be commensurate with the benefit it provides. The Commission has considered stakeholder feedback that:

- Existing reporting and monitoring tools can already be used to reasonably foresee a closure⁶⁷
- The benefit provided by the obligation depends on the design of the solution.⁶⁸

The Commission agrees that participants could potentially use other reporting and monitoring tools to get insights into the possibility of a closure. However, in the absence of a clear obligation this information could be inconsistent and untimely. Therefore, it is better to have an obligation for transparency and consistency. The Commission's final rule requires a reporting entity to inform AEMO, and AEMO to report on the closure through the GSOO and VGPR in order to ensure the information is clearly communicated, not just inferred, without imposing any undue regulatory burden on participants.

In response to the draft determination:

- most stakeholders supported the obligation being reported to AEMO through the GSOO survey and then substantively published by AEMO through the GSOO and VGPR, considering it a fit for purpose solution.⁶⁹
- While supportive of reporting through the GSOO and VGPR:
 - APA does not support updating new reportable closures outside of the survey cycle⁷⁰

61 AEMC, [ECGS Projected Assessment of System Adequacy](#).

62 Table A.1 in the Background Paper.

63 Submission to the consultation paper, APLNG, p 5.

64 For more details on Stage 1 RSA gas reforms, please see Chapter 3 of the AEMC's background paper.

65 Also see: ECGS Reliability standard and associated settings, ECGS Supplier of last resort mechanism, and ECGS projected assessment of system adequacy.

66 Rule change, ECGS Projected Assessment of System Adequacy.

67 Submissions to the consultation paper: Jemena, p 1; Origin, p 1; APLNG, p 5.

68 Submission to the consultation paper, AGL, p 2-3.

69 Submissions to the draft determination: APGA, p 1; APA, p 1; APLNG, p 1; AGL, p 1.

70 Submission to the draft determination, APA, p 2.

- AGL believes the requirement to report closure information outside of the GSOO survey cycle would create unnecessary complexity and administrative burden.⁷¹

The Commission considers that requiring this obligation to be reported through the GSOO and VGPR reflects good regulatory practice as it is a reporting mechanism that is well utilised and understood by AEMO, market participants, and policymakers. Additionally, the facilities captured by this obligation are existing GSOO reporting entities, meaning there is no added regulatory burden being imposed on the entities.

The Commission considers that, in line with stakeholder feedback:

- the proponent's preferred approach of reporting closures through the Bulletin Board did not satisfy the assessment criterion of good regulatory practice because its implementation would unduly burden participants relative to the benefit it would provide.⁷²
- requiring reporting entities to notify AEMO of a reportable closure outside of the survey cycle is important to ensure the timing element of providing at least 36 months' notice is met, in line with the intent of introducing the obligation. The Commission does not consider this creates unnecessary complexity or administrative burden. See section 3.3.2.

In summary, we consider that the following elements of the final rule minimise regulatory burden, being consistent with principles of good regulatory practice:

- the use of the GSOO and VGPR leverages existing reports and survey mechanisms, avoiding costly IT and system changes
- the 36 month "where practicable" requirement encourages timely reporting but avoids penalising unforeseeable closures while requiring information from the reporting entity on why it was not able to meet the preferred 36 month timeframe; and
- the 10 TJ/day facility-level threshold avoids overly burdensome reporting by smaller assets and subcomponents.

APLNG has expressed concerns over significant overlap and duplication in reporting and compliance obligations across the ECGS

APLNG has expressed concerns that, in its view, there is significant overlap and duplication in the reporting and compliance obligations imposed by regulatory instruments in the ECGS. It recommended pausing the rule change process and for it to be assessed within the broader context of the work being undertaken by the Commonwealth, including the Gas Market Review, to prevent new reporting obligations being introduced in isolation.⁷³

In developing this obligation the Commission has worked closely with stakeholders to consider broader reforms and the potential regulatory burden on reporting entities and factored this into its decision-making, as outlined throughout chapter 2. The Commission will continue to monitor other developments in the ECGS, such as the Commonwealth Gas Market Review.

71 Submission to the draft determination, AGL, p 2.

72 Submissions to the consultation paper: APLNG, p 5; Epic Energy, p 2-3; APA, p 15; AGL, p 4. Submissions to the draft determination: APGA, p 1; APA, p 1; APLNG, p 1; AGL, p 1.

73 Submission to the draft determination, APLNG, p 1-2.

3 Our final rule introduces an advanced notice of closure obligation for gas infrastructure in the NGR

This chapter provides an overview of the final rule which takes into account stakeholder feedback provided in submissions to the consultation paper and draft determination.

- Section 3.1 explains what the notice of closure obligation applies to
- Section 3.2 outlines that the obligation is to be reported at least 36 months in advance, where practicable
- Section 3.3 describes how the obligation is given effect through AEMO's planning reports
- Section 3.4 outlines when the rule commences

3.1 The final rule introduces a notice of closure obligation for six gas infrastructure types

Box 1: The final rule introduces an advanced notice of closure obligation

The final rule applies to six infrastructure types (with a nameplate rating of more than 10TJs of gas per day) that could materially impact reliability and supply adequacy of the ECGS if they close:

1. LNG import facilities
2. Production facilities
3. Pipelines
4. Compression facilities
5. Storage facilities
6. Blend processing facilities

The reporting trigger is where the facility has made a decision to permanently cease supplying covered gas services. As such, the obligation does not apply to planned or unplanned maintenance, refurbishment, or other modifications.

Changes from draft to final rule:

- Removing blended gas distribution systems from the reporting obligation because the intent of the final rule is to require information from infrastructure that could materially impact the reliability and supply adequacy of gas to customers.

Historically, while the NGR provided a range of monitoring and communication tools to help identify and signal supply threats to the ECGS,⁷⁴ none of these tools specifically required participants to disclose, or AEMO to report on, a decision to permanently close gas infrastructure. Participants may have been able to infer a closure based on reported capacity information. Alternatively, information could be disclosed by some participants as a result of other regulatory obligations, for example through market disclosures on the ASX.

The final rule will ensure there is a formal obligation for closure information to be reported transparently and in advance. The Commission believes that this will help reduce information asymmetries in how and when this information is communicated to the market. See section 2.3.2.

74 Table 3.1 in the ECGS Notice of closure for gas infrastructure [draft determination](#).

3.1.1 The obligation applies to six infrastructure types

The final rule applies:

- To six infrastructure types that meet the Bulletin Board reporting threshold, where the nameplate rating⁷⁵ is or will be equal to or more than 10 TJs of gas per day. See table 3.1 below.

Table 3.1: The reporting obligation applies to six infrastructure types

Infrastructure it applies to	Definition	Examples include
LNG import facility	A facility for unloading of LNG delivered by ship, storage of LNG, and processing of the LNG to a gaseous state.	Port Kembla Import Facility
Production facility	A gas processing plant at which natural gas, or facility at which any other primary gas, is produced in a form suitable for injection into one or more pipelines. This does not include a blend processing facility.	Longford Gas Plant (Vic) Otway Gas Plant (Vic) Moomba Gas Plant (SA) Woleebee Creek (Qld)
Pipeline	A transmission pipeline that is a scheme pipeline or designated pipeline or any other BB transmission pipeline that meets the reporting threshold. This does not include distribution systems.	South West Queensland Pipeline Moomba to Sydney Pipeline Eastern Gas Pipeline Victorian Transmission System
Compression facility	A designated or standalone compression service facility.	Wallumbilla Compressor Station
Storage facility	A facility for storing gas (including LNG) for injection into a pipeline. This does not include a facility for storing imported LNG as part of a LNG import facility, or a facility for storing LNG prior to export at an LNG export facility.	Iona Underground Gas Storage
Blend processing facility	A facility that blends one or more primary gases with or without other substances for injection into a pipeline, or the separation of a gas blend withdrawn from a pipeline before re-injection.	Hydrogen Park South Australia Hydrogen Park Murray Valley Hydrogen Park Gladstone

Source: AEMC; NGR (these are existing definitions in the NGR).

⁷⁵ Nameplate rating: means the maximum daily capacity of the facility under normal operating conditions.

The proponent proposed that operators of production, pipeline, compression, and storage facility infrastructure that meet the Bulletin Board reporting threshold would be subject to this obligation.⁷⁶ The proponent also proposed that large users would not be subject to this obligation.⁷⁷

Overall stakeholders agreed that the obligation should apply to facilities that have the most material impact on reliability. In particular, they considered the obligation should:

- Generally apply at a facility level because decommissioning a subcomponent does not imply closure of the plant as a whole⁷⁸ However, some stakeholders consider that some subcomponents, including critical facilities under 10 TJ/day (Dandenong liquefaction facility) could impact the materiality of the ECGS.⁷⁹
- Not apply to large users⁸⁰

The Commission considers that the obligation should apply to whole facilities rather than subcomponents because:

- the nature of gas infrastructure is complex. For instance, the retirement of individual wells or fields is primarily determined by geological and geophysical characteristics and therefore technically complex to determine;⁸¹ an individual well or field closing does not necessarily imply that a production facility is ceasing production.
- AEMO is able to gain visibility of the impending closure of subcomponents through the two year medium-term capacity outlook⁸², and the ST and MT PASA rule change, if made, could further extend the quality of information available⁸³
- The *Extension of DLNG arrangements* draft rule would require the Dandenong liquefaction facility to be subject to the same participant disclosure obligations as other DWGM facility operators on a permanent basis which would address stakeholder concerns in relation to that facility specifically⁸⁴
- the closure of gas infrastructure is expected to occur infrequently.⁸⁵

The final rule includes the infrastructure the proponent recommended⁸⁶ in addition to blend processing facilities and LNG import facilities.⁸⁷ The Commission considers that the two additional facilities should be captured by the obligation because they provide a more complete view of the production and transmission supply chain which is important to understand in managing any potential reliability threats. Blended gas distribution systems, while included in the draft rule, have been removed. Further information on this change is outlined below.

Based on stakeholder feedback the Commission believes that there is a benefit to having these six infrastructure types report closure information. Specifically, the Commission considers that:

⁷⁶ Rule change request, p 5.

⁷⁷ Rule change request, p 49.

⁷⁸ Submissions to the consultation paper: Epic Energy, p 3; Shell, p 3; AEC, p 1; Submission to the draft determination, APGA, p 1.

⁷⁹ Submissions to the draft determination AEMO, p 1; EUAA, p 1-2.

⁸⁰ Submission to the consultation paper, AGL, p 3.

⁸¹ Submission to the consultation paper, AEC, p 1.

⁸² AEMO submission to the draft determination, p 1.

⁸³ Draft determination, [ECGS Projected Assessment of System Adequacy](#).

⁸⁴ AEMC, Draft rule determination, [Extension of DLNG arrangements](#), 7 August 2025.

⁸⁵ Rule change request, p 20.

⁸⁶ Rule change request, p 5.

⁸⁷ Blend processing facilities were not explicitly mentioned in the rule change request because at the time it was being developed, they were not part of the Bulletin Board reporting framework.

- the obligation falls on the commercial offering, for example pipeline infrastructure operates as an integrated system, but the commercial offering is generally the pipeline in its entirety⁸⁸
- an obligation on infrastructure of these types and size provides a more accurate picture of gas production, storage, pipeline flows, and consumption in the east coast which, on balance, provides the necessary information to assess whether there are any reliability or supply adequacy threats posed by the closure.

The final rule does not apply to:

- Large user facilities: a significant sub-section of large users, gas powered generation (GPG), are already subject to the NEM notice of closure obligation, therefore it would be duplicative to include it in this rule change. Other large users are unlikely to pose a material risk to reliability and could in fact improve reliability in the short term.
- LNG export facilities: would not negatively impact domestic reliability if it closed, for example a facility which draws on the domestic market to make good its contracts could theoretically help domestic supply if it no longer required gas from the domestic market.
- Distribution networks: while the draft rule included blended gas distribution systems, this has been removed from the final rule because the intent of the obligation is to require information from infrastructure that could materially impact the reliability and supply adequacy of gas to customers. In the ECGS, these facilities are “upstream” of the citygate, whereas blended gas distribution systems are pipelines beyond the citygate. The closure of distribution networks would likely be triggered by a loss of small and residential customers due to electrification or as a downstream consequence of decisions made by the facilities required to notify under this obligation. Additionally, the issues and costs associated with gas distribution systems are being considered in separate rule change processes.⁸⁹

3.1.2 The obligation applies to infrastructure that will permanently cease supplying covered gas services

The reporting trigger for the notice of closure obligation applies to a reportable closure decision.⁹⁰ This means that if any of the six gas infrastructure types are to permanently cease supplying covered gas services, the GSOO reporting entity that is the Bulletin Board reporting entity for the facility must report this to AEMO. This information is to be provided to AEMO either through the GSOO survey process or, if new information is identified after responding to a GSOO survey, through a notification to AEMO. See section 3.3 for more information on how the final rule is given effect through the GSOO. Importantly, this captures permanent closures, but does not capture changes in capacity due to temporary closure for planned or unplanned maintenance, refurbishment, or other modifications.

Stakeholders support the obligation capturing permanent closure

APA recommended that ‘closure’ should refer to permanent closure of assets. It supported the proponent’s position that this should not capture maintenance, refurbishment or other modifications that do not result in permanently ceasing to supply gas.⁹¹

The Commission considers, in line with stakeholder feedback, that this obligation should apply to a decision to permanently cease supply of covered gas services. We consider that notification of

88 Submission to the consultation paper, Epic Energy, p 2.

89 Energy Consumers Australia has submitted [four rule change requests](#).

90 Rule 135K, new definition of ‘reportable closure decision’.

91 Submission to the consultation paper, APA, p 14.

closure should, and is likely to, occur before decommissioning or possible remediation in order to maximise the market and policymakers' response to any potential reliability threats.

3.2 Notice of closure will be reported at least 36 months in advance where practicable

Box 2: The final rule will require at least 36 months notice where practicable

The reporting entity is required to inform AEMO as soon as practicable after a decision is made to permanently cease supplying covered gas services and at least 36 months prior to the intended date for cessation where practicable.

The Commission considers that providing advanced notice of closure promotes timely reporting to the market. Nevertheless, the Commission is allowing for flexibility to report a closure if a closure decision is made within 36 months.

Changes from draft to final rule:

- None.

The final rule requires reporting entities to inform AEMO as soon as practicable after a decision is made to permanently cease supplying gas, and where practical, at least 36 months prior to the intended date for cessation of supply.⁹² Reporting entities will either inform AEMO through the GSOO survey process, or by notification if a closure decision is made outside of a GSOO survey cycle - see section 3.3.

3.2.1 Providing advanced notice of closure promotes timely reporting to the market

The proponent proposed 36 months as the notice period based on their initial consultation on the Commonwealth's stage 2 reforms. Feedback from stakeholders during this process noted that new gas infrastructure projects can take three to five years from inception to commissioning.⁹³ The proponent stated that having a notice period of at least 36 months prior to closure could provide market participants sufficient time to make informed and efficient decisions about how to respond and mitigate the impacts of the closure, as well as enable governments to make more informed policy decisions.

Based on stakeholder feedback⁹⁴ the Commission believes, on balance that 36 months is a sufficient amount of time to require advanced notice. However, the Commission considers that there is benefit in the reporting entities providing as much notice as possible. As a result, the definition of a reportable closure decision is not strictly time-bound and could be made, and therefore reported, before the 36 months' notice period suggested by the proponent.

The final rule provides flexibility for closure decisions to be reported within 36 months with reasons provided

We acknowledge, consistent with the proponent's view, that in general terms there is a window in which market participants and policymakers can respond effectively to a closure. We consider that this is, where practical, at least 36 months prior to the cessation of supply of covered gas

⁹² Rule 135KE(4C); rule 324(5A).

⁹³ Rule change request, p 12.

⁹⁴ Submissions to the consultation paper: Origin, p 1; AGL, p 4; Jemena, p 1.

services. However, the Commission has not set a strict minimum notice period in the final rule⁹⁵, as this could create practical difficulties in circumstances where a closure decision happens within 36 months for some unforeseen circumstance. AGL stated that, for this reason, the rule should allow for flexibility to report within 36 months.⁹⁶

In this circumstance, the final rule requires the reporting entity to provide reasons in writing to AEMO on why notice could not be given 36 months in advance.⁹⁷ The reasons will be published by AEMO. This approach balances the desired intent of early disclosure with a recognition that exceptional circumstances may arise. When a shorter notice period is provided the Commission considers this additional information is important to help market participants respond to any potential reliability and supply adequacy threats as efficiently as possible. By providing further information and therefore greater transparency, the market, participants, governments, and policymakers will be able to more accurately understand the circumstances around the closure decision and respond accordingly.

In order to account for these sorts of circumstances, if a strict minimum notice period was in place, the Commission would need to develop an exemptions framework or other mechanism to address non-compliance risks. This is an approach that the EUAA supported including having the AER play an active role in compliance and develop an exemptions framework.⁹⁸ We consider that this would create regulatory complexity that is not proportionate to either the identified problem or potential benefit.

Therefore, on balance, we consider that the final rule provides a better approach than creating an exemptions framework or other mechanism to address non-compliance risks. This is because it strikes an appropriate balance between sufficient and timely information being provided on potential reliability and supply threats to the ECGS and the costs associated with developing an exemptions or non-compliance framework for closures that are expected to occur infrequently.

Additionally, reporting entities are likely to have other reporting requirements, for example, through market disclosures to the ASX, or alternatively through directors' responsibilities under other Acts. The intent of this rule is to provide helpful information to reduce any information asymmetries which could help inform and manage reliability and supply adequacy in the ECGS. We expect that in practice reportable closures will be disclosed at least 36 months or more in advance except in exceptional circumstances.

3.3 The notice of closure obligation will be reported through the GS00 and VGPR

Box 3: Closures are reported through the GS00 and VGPR

The final rule requires AEMO to publish on its website a notice of a reportable closure decision and to report any closures through the GS00 and VGPR. This information will be collected from participants through the GS00 survey process. The survey is also used for the purposes of the VGPR.

The survey requires GS00 reporting entities who are BB reporting entities for the relevant facilities

⁹⁵ Rule 135KE(4C); rule 324(5).

⁹⁶ AGL submission to the draft determination, p 2.

⁹⁷ Rule, 125KE(4D).

⁹⁸ Submission to the draft determination, EUAA, p 2-3.

(which captures the six infrastructure types) to participate and respond to AEMO's questions. The final rule requires the GSOO reporting entity to provide information in relation to a reportable closure decision and the intended date of cessation of supply of covered gas services. On receipt of the GSOO survey response AEMO will:

- a) publish a notice on its website notifying the market of the reportable closure decision
- b) substantively consider the reportable closure decision in the upcoming GSOO and VGPR

If a GSOO reporting entity identifies new information in relation to a reportable closure decision after responding to a GSOO survey, the final rule requires it to provide the information to AEMO as soon as practicable. This could include a change to a previously disclosed intended date for cessation of supply. AEMO is then required to publish a notice, and will consider whether a supplement to the GSOO and VGPR is required.

Changes from draft to final rule:

- AEMO is to publish a notice on its website when it is made aware, through a GSOO survey, of a reportable closure decision.

The final rule is designed to ensure notice of closure information is reported in advance without undue reporting obligations or costs placed on participants and AEMO, and in a form that is accessible and beneficial to market participants, governments, and other stakeholders. Therefore, the Commission has made a final rule to give effect to the obligation by amending the GSOO and VGPR to require participants to report to AEMO and for AEMO to publish any reportable closure decisions. The information will be published by a notice on AEMO's website and reported through both planning reports to ensure closure information is adequately captured across all components of the ECGS including the DTS.

The proponent's preferred approach was to amend the Bulletin Board medium term capacity outlook provisions in Part 18 of the NGR to require infrastructure operators to report on closures. The proponent believed that the Bulletin Board was the best option because information on planned closures would be published in a timely, frequent, and readily accessible manner.

While some stakeholders initially agreed that the Bulletin Board would be a good solution as it would allow for regular updates and notification at any time, on balance stakeholders favoured including the obligation in the GSOO and VGPR.⁹⁹ Stakeholders cited concerns with implementation costs related to process and system changes, specifically that the Bulletin Board option would result in substantial costs to augment IT systems (including AEMO).¹⁰⁰ AGL, however, considered that the annual publication of the GSOO and VGPR is not a reason in itself to not proceed with it, as this limitation could be addressed.¹⁰¹

The Commission believes requiring participants to report to AEMO on expected closures through the GSOO and VGPR survey is a fit for purpose solution that is consistent with the materiality of the problem identified because the planning reports:

- are well-established reporting tools
- have an existing penalty framework
- would allow reportable closure decisions to be published in a timely and readily accessible manner without burdensome continual reporting requirements placed on reporting entities

⁹⁹ Submissions to the draft determination: APGA, p 1; APA, p 1; APLNG, p 1; AGL, p 1.

¹⁰⁰ Submissions to the consultation paper: APLNG, p 5; Epic Energy, p 3; APA, p 15.

¹⁰¹ Submission to the consultation paper, AGL, p 4.

- are low cost options to implement, as they have existing processes in place and avoid the need to develop and maintain a separate reporting platform
- are easily accessible, well-utilised and understood by non-market entities and broader audiences.

The Commission agrees with stakeholders that the annual reporting limitation can be overcome. We have factored this into the final rule - see section 3.3.2.

3.3.1 Information on reportable closure decisions is collected through the GS00 and VGPR survey process

When updating the GS00 and VGPR, AEMO relies on GS00 reporting entities (see Table 3.2 below) to provide information that is accurate and timely through a GS00 survey.¹⁰²

Table 3.2: GS00 reporting entities

Entities	Description
(a) A person who owns, operates or controls a covered gas industry facility	<p>This includes a person who owns, operates or controls:</p> <ul style="list-style-type: none"> (i) a pipeline that has a nameplate capacity equal to or more than 10TJ/d (ii) a compression service facility (iii) a gas production facility (iv) a blend processing facility (v) an LNG export facility or an LNG import facility which processes more than 2 PJ per year from one or more sites (vi) a storage facility that holds a capacity of 0.5PJ at one or more sites (vii) a user facility: for gas-fired power generation that consumes gas for the purposes of electricity generation; or that consumes more than 0.5 PJ per year (viii) a BB field that holds reserves and/or resources.
(b) BB reporting entity	<p>a BB reporting entity under Part 18 of the NGR, including:</p> <ul style="list-style-type: none"> (i) a field owner for a BB field interest (ii) a facility operator for a BB facility (iii) a facility developer for a facility development project
(c) Distributor or network operator	a distributor or network operator under Part 15A or Part 18 of the NGR

¹⁰² Rule 135KE(2)-(3).

Entities	Description
(d) retailer or self-contracting user	retailer or self-contracting user (including market participant-other) registered under Part 15A of the NGR
(e) BB shipper or STTM Shipper	(i) BB shipper as defined in Part 18 of the NGR (whether registered under Part 18 or not) (ii) STTM shipper registered under Part 15A of the NGR
(f) user	user registered under Part 15A as any of the following: (i) a BB large user facility (ii) a STTM User (iii) a Market Participant - Distribution Customer (iv) a Market Participant - Transmission Customer
(g) Relevant entity	relevant entity under Part 27 of the NGR

Source: AEMO, [GS00 Procedures](#), Table 1.

The survey adheres to a carefully planned timeline, Figure 3.1 below illustrates an example of key dates for the GS00 survey process.

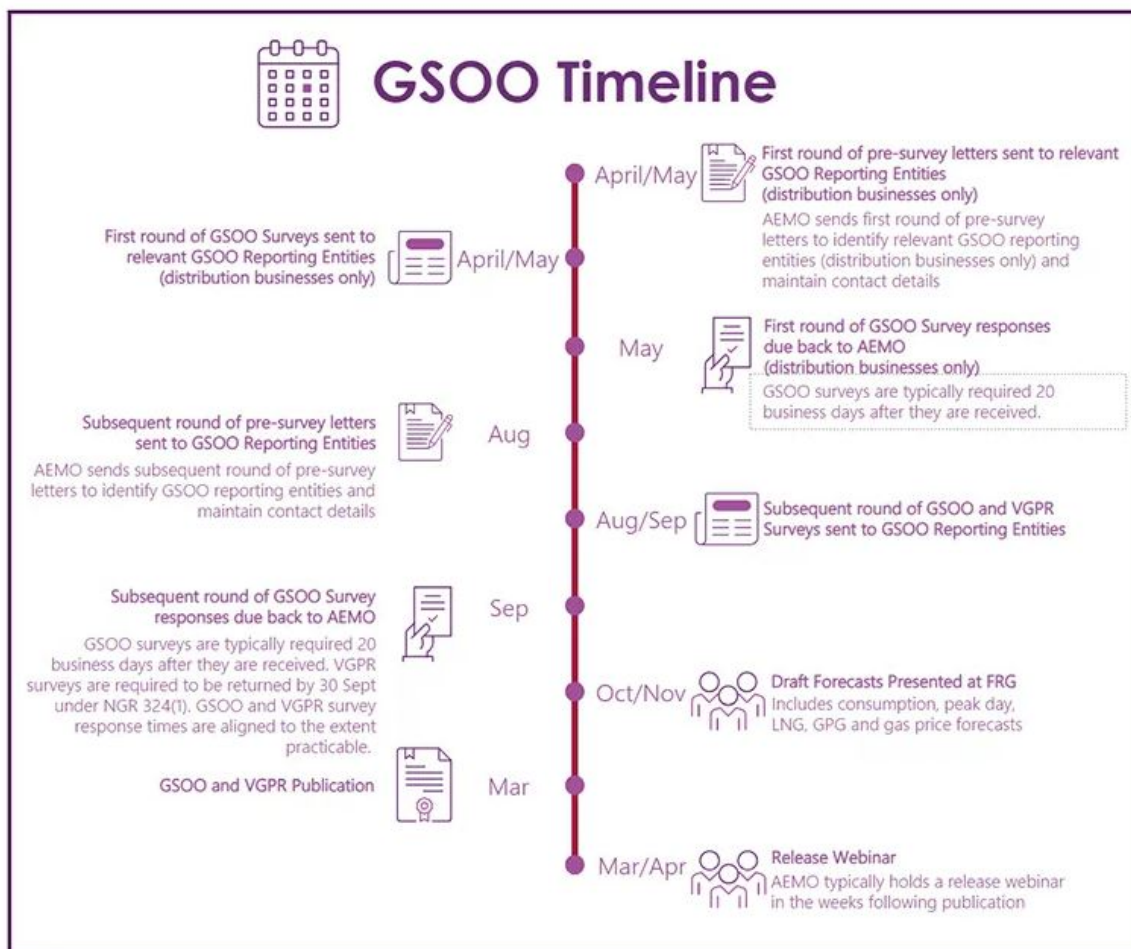
The GS00 survey comprises questions that are relevant to that GS00 reporting entity or class of GS00 reporting entities.¹⁰³ The most recent survey templates are made available on AEMO's website.¹⁰⁴ The information collected through a GS00 survey can also be used by AEMO to prepare and publish the VGPR¹⁰⁵ meaning there is minimal risk of duplication for reporting entities between the two planning reports.

¹⁰³ GS00 Procedures, p 8.

¹⁰⁴ [GS00 Survey Examples](#).

¹⁰⁵ Rule 135KH(1A).

Figure 3.1: Example of a GSOO Timeline



Source: AEMO, GSOO, Timelines, Procedures and Surveys, <https://aemo.com.au/energy-systems/gas/gas-forecasting-and-planning/gasstatement-of-opportunities-gsoo/timelines-procedures-and-surveys>.

Note: Note: The exact timeline followed in any particular year may differ.

Reporting entities will inform AEMO through the GSOO survey

The final rule requires the GSOO reporting entities who are BB reporting entities for the six infrastructure types, outlined in section 3.1.1, to inform AEMO of a reportable closure decision, at least 36 months in advance where practicable, through the usual GSOO survey process. The Commission considers that (unlike the Bulletin Board) this is not only a process that GSOO reporting entities are familiar with, but does not require AEMO or participants to update their processes or systems, because it does not require changes to the GSOO survey process. See section 2.3.1.

Registered participants who are declared transmission system service providers in the DTS will inform AEMO

AEMO requested clarity around how the reporting obligation would work in the DTS, noting that while it is the reporting entity for the DTS it is not the facility owner.¹⁰⁶

106 Submission to the draft determination, AEMO, p 2.

As such, in line with the intent that the obligation captures all reportable closure decisions in the ECGS, the final rule clarifies that in the DTS, registered participants who are the declared transmission system service provider for a declared transmission system must provide information on reportable closure decisions to AEMO.¹⁰⁷

Notification of a reportable closure decision will occur as soon as possible

While the EUAA believes the GSOO survey process is appropriate for gathering information, it also believes the notification of a reportable closure decision should occur as soon as possible after the decision is made. This is to ensure that the market is not waiting until the next survey to avoid a possible situation where the reporting entity has notified AEMO exactly 36 months in advance but the GSOO and VGPR are not published until some months later.¹⁰⁸

The Commission's policy intent, in line with the rule change request and stakeholder feedback, has been to provide at least 36 months notice, where practicable, to the market. As such the Commission's final rule requires AEMO to publish a notice on its website once a reporting entity has indicated a reportable closure decision at any point, including in the GSOO survey.¹⁰⁹ This does not change the reporting obligations on reporting entities (as outlined in the draft rule) as they are still only required to notify AEMO, where practicable, at least 36 months in advance. The draft rule had proposed that AEMO would publish a notice on its website only if it received a reportable closure decision outside of the GSOO survey cycle (see section 3.3.2). This change (requiring publication of a notice for all reportable closure decisions) means that information will be made available to the market at the earliest available opportunity, while not creating an additional burden on reporting entities or AEMO.

As such, the information collected by AEMO through the GSOO survey will then be:

- published by notice on AEMO's website
- used to inform and substantively report through the GSOO and VGPR.

3.3.2 AEMO is required to publish a notice if closure information comes forth outside a survey and publication cycle

The final rule ensures any new information in relation to a reportable closure decision will be captured and reported on outside of the GSOO survey process. The process includes:

1. GSOO reporting entity identifies new information after responding to a GSOO survey

A reporting entity identifies new information, including:

- a new reportable closure decision; or
- a change to the intended date for cessation of supply previously disclosed to AEMO

2. GSOO reporting entity provides new information to AEMO as soon as practicable

Where a reporting entity identifies new information, including a new reportable closure decision, or a change to the intended date previously disclosed to AEMO after responding to a GSOO survey, it must provide the new information to AEMO as soon as practicable.¹¹⁰

¹⁰⁷ Final rule 324(2)(g).

¹⁰⁸ EUAA submission to the draft determination, p 1-2.

¹⁰⁹ Rule 135KDA.

¹¹⁰ Rule 135KE(4B).

3. AEMO publishes notice with new information as soon as practicable

AEMO publishes a notice on its website regarding the new information as soon as practicable.¹¹¹

4. AEMO considers whether it is appropriate to publish a supplement to either the GSOO or VGPR¹¹²

AEMO will then consider whether to publish a supplement. For the GSOO, AEMO is only required to publish a supplement if 'significant and verifiable' new information relevant to the GSOO is brought to AEMO's attention.¹¹³ Before this rule, the VGPR required AEMO to update the planning review if it became aware of any new information that materially altered it. The final rule brings the VGPR into line with the GSOO whereby AEMO may publish a supplement if it considers that the new or changed information materially alters the most recently published VGPR.¹¹⁴

Reporting outside of a survey cycle ensures new information is received in a timely, transparent, and least cost way

While AGL believes reporting outside of the survey cycle would create unnecessary complexity and be an administrative burden,¹¹⁵ the Commission disagrees because the final rule only requires reporting entities to inform AEMO of any new reportable closure decisions or updates to reportable closure decisions. The Commission has not amended the arrangements that only require AEMO to publish a supplement if 'significant and verifiable' new information relevant to the GSOO is brought to AEMO's attention.¹¹⁶ The Commission believes this requirement provides benefits commensurate to the costs of the obligation.

APA, while supportive of reporting through the GSOO and VGPR, and ensuring the obligation includes updating AEMO of any changes to an already disclosed reportable closure, does not support reporting on new closures outside of the survey process.¹¹⁷ The intent of this obligation is to ensure timely disclosures at least 36 months in advance, where practicable, therefore it is appropriate for a new reportable closure decision made outside of the GSOO survey process to be made known promptly. The Commission does not consider this to be a burdensome requirement.

In line with stakeholder feedback, the Commission considers that publication of information once it is provided to AEMO ensures the market receives closure information in a timely, transparent, and least cost way if new or updated information comes forth out of the GSOO and VGPR publication cycles. This reporting requirement is designed to complement, not duplicate, existing legal obligations, such as ASX continuous disclosure requirements or project-specific regulatory approvals. Additionally, this ensures that any reportable closure decisions made within the 36 months' reporting timeframe are reported as soon as practicable. See section 3.2.

3.3.3 Existing GSOO compliance framework and civil penalty provisions apply

Importantly, the notice of closure obligation is subject to the existing GSOO compliance framework and civil penalty provisions. The NGL requires a person who has possession or control of information in relation to the covered gas industry to give information to AEMO for use in the preparation, review, revision or publication of the GSOO if the person is required to do so under the

¹¹¹ Rule 135KDA; Rule 323(6)(a).

¹¹² Note: the VGPR is informed by the GSOO survey.

¹¹³ Rule 135KD of the NGR.

¹¹⁴ Rule 323(6)(b).

¹¹⁵ AGL submission to the draft determination, p 1-2.

¹¹⁶ Rule 135KD of the NGR.

¹¹⁷ Submission to the draft determination, APA, p 1.

Rules.¹¹⁸ The Rules require GSOO reporting entities to participate in a GSOO survey in accordance with, and by the time specified in, the GSOO Procedures.¹¹⁹ Further, under the NGL, a person must not give GSOO information to AEMO that the person knows is false or misleading in a material particular.¹²⁰ A person who gives AEMO information in bad faith or is negligent could incur civil monetary liability.¹²¹

This means that if a reporting entity does not provide AEMO with information about a reportable closure decision in accordance with the requirements under the Rules or does so either in bad faith or negligence in their response to a GSOO survey, enforcement action could be taken against them and they could be penalised. In effect, the Commission is satisfied that the existing compliance framework and tier 1 civil penalties relating to the GSOO will promote compliance with the notice of closure obligation.

3.4 The rule commences on 18 September 2025 and includes details of any closures from the 2026 reporting year

The final rule commences on 18 September 2025, so the notice of closure information can be made available in the 2026 GSOO and VGPR. The Commission considers it is important that this obligation commences as soon as possible to provide the market with information to help manage any potential reliability or supply adequacy threats.

As outlined, GSOO reporting entities are required to report to AEMO from the commencement of the rule if they have made a decision to permanently cease supplying covered gas services at any relevant facility for which they are the BB reporting entity. While the primary reporting mechanism for reporting entities is intended to be the GSOO survey, if AEMO has finalised its GSOO survey process for 2026, the reporting entity still has an obligation to notify AEMO through the usual process to update a survey response.

The Commission considers that any reporting entity that responds to the 2026 GSOO survey prior to 18 September 2025 must update its survey response to account for this Amending rule.

Despite the obligation commencing when the final rule commences, AEMO requested transitional provisions to amend the GSOO Procedures to reflect the new requirement to report closure decisions or updates to closure dates.¹²² The Commission considers that the final rule will capture information to be published in the 2026 GSOO and VGPR, and also considers that AEMO has existing powers under the Rules to update the GSOO Procedures.¹²³ However, to provide certainty to participants we have clarified in the final rule that AEMO must update its GSOO Procedures no later than 5 March 2026 and the obligations of GSOO reporting entities and Registered participants under the final rule will apply on and from the commencement date, notwithstanding the absence of any updates to the GSOO Procedures.¹²⁴

Additionally, if AEMO receives a reportable closure decision from a reporting entity outside of the GSOO survey but in close proximity to the publication of the planning reports, AEMO is to consider whether to include it in the upcoming planning reports or to publish a supplement - see section 3.3.2.

¹¹⁸ Section 91DB of the NGL.

¹¹⁹ See rule 135KE(3) which is classified as a tier 1 civil penalty provision and rule 135KG(2) which is classified as a tier 2 civil penalty provision.

¹²⁰ Section 91DD of the NGL.

¹²¹ s91DE of the NGL.

¹²² Submission to the draft determination, AEMO, p 1-2.

¹²³ Rule 135EE and 135EF of the Rules.

¹²⁴ Schedule 2 of the Final rule, Part 21, Division 1, rule 108.

A Rule making process

A standard rule change request includes the following stages:

- a proponent submits a rule change request
- the Commission initiates the rule change process by publishing a consultation paper and seeking stakeholder feedback
- stakeholders lodge submissions on the consultation paper and engage through other channels to make their views known to the AEMC project team
- the Commission publishes a draft determination and draft rule (if relevant)
- stakeholders lodge submissions on the draft determination and engage through other channels to make their views known to the AEMC project team
- the Commission publishes a final determination and final rule (if relevant).

You can find more information on the rule change process on our website.¹²⁵

A.1 Energy Senior Officials proposed a rule change to introduce an advanced notice of closure obligation for the ECGS

The 'ECGS notice of closure for gas infrastructure' rule change request¹²⁶ is one of four rule change requests that together seek to implement stage 2 of the RSA framework reforms for the ECGS. The intention for the stage 2 reforms is to equip AEMO and market participants with further tools to respond to any threat of gas supply shortfalls.

The proponent is of the view that, while historically gas infrastructure closures have not been an issue, the size and scope of the energy transition could trigger the closure of some natural gas supply and delivery infrastructure. The proponent believes that without sufficient advanced notice given to the market these closures could impact on the reliability of supply of the ECGS by limiting the ability of market participants to respond in an informed and efficient manner to any RSA threats associated with the closure.

The proponent considers that, prior to this rule, gas market monitoring and communication tools did not provide market participants with sufficient notice for planned closures of gas supply and delivery infrastructure.¹²⁷

The proponent believes that the absence of advanced reporting requirements for the closure of gas supply and delivery infrastructure, prior to this rule, would adversely affect the market. Having incomplete, inaccurate, or asymmetric information could:

- Limit the ability of market participants to plan and respond in an informed and efficient manner to any threats associated with any closures¹²⁸
- Affect the efficiency with which gas supply and delivery infrastructure and resources are allocated, ultimately impacting the reliability of supply for the ECGS¹²⁹
- Impact the NEM and electricity supply because GPG may also be impacted.¹³⁰

¹²⁵ See our website for more information on the rule change process: <https://www.aemc.gov.au/our-work/changing-energy-rules>.

¹²⁶ Rule change request.

¹²⁷ Rule change request, p 9.

¹²⁸ Rule change request, p 8.

¹²⁹ Rule change request, p 10.

¹³⁰ Rule change request, p 10.

A.2 The rule change request proposed three options to implement a notice of closure obligation

The proponent identified three potential options¹³¹ to implement an advanced notice of closure obligation:

- **Option 1:** Amend the GSOO provisions in Part 15D of the NGR and VGPR provisions in Part 19 of the NGR to require AEMO to report on planned closures of supply and delivery infrastructure with at least 36 months notice.
- **Option 2** (the proponent's preferred option): Amend the Bulletin Board medium-term capacity outlook provisions in Part 18 of the NGR to require supply and delivery infrastructure operators to report on planned permanent closures with at least 36 months notice.
- **Option 3:** Include a new part in the rules that requires a notice of closure of supply infrastructure and largely mirrors the requirements in the NEM. This would provide at least 42 months' advanced notice of closure.

Option 2 is the proponent's preferred approach because, in their view, it would provide the greatest transparency of planned closures, while also providing a relatively 'light touch' approach by using the existing Bulletin Board reporting and penalty framework. The proponent believes that this would minimise costs and impacts on affected parties without compromising the benefits of improving transparency around planned closures.¹³²

A.3 By providing more transparency the rule change request proposed that an advanced notice of closure obligation could contribute to reliability of the ECGS

The proponent states that the proposed rule is expected to benefit market participants by providing them with more timely and transparent information on planned supply and delivery infrastructure closures. It would also support improved forecasting through improved alignment with the GSOO, VGPR, and proposed gas PASA, enabling more informed and efficient planning and investment decisions by market participants and governments.¹³³

This could facilitate timelier and more efficient decision-making and market led responses, which could directly benefit individual market participants, gas consumers, and the market more generally, by allowing market participants to:

- Make more timely, informed, and efficient consumption, production, infrastructure use and investment decisions in relation to:
 - supply and delivery infrastructure that is closing
 - replacement sources of supply (covered gas or other lower emission energy sources) and delivery infrastructure
 - their own facilities, which could involve implementing energy efficiency measures to reduce their covered gas consumption or switching to lower emission energy sources.
- Respond in a more timely, informed, and efficient manner to any reliability or supply adequacy threats that may be associated with the closure and, therefore, limit the need for more costly and potentially distortionary interventions by AEMO.

¹³¹ Rule change request, p 10-11.

¹³² Rule change request, p 13.

¹³³ Rule change request, p 16.

The proponent states that the proposed rule would also result in significant indirect benefits, by avoiding the reliability and supply adequacy threats, inefficient decision-making and inefficient allocation of resources that may be associated with an unanticipated closure of supply and delivery infrastructure, the costs of which would ultimately be borne by gas consumers.

In effect, the proponent states that providing advanced notice of planned closures could facilitate more timely and efficient responses by market participants and could reduce the need for AEMO to intervene to address reliability or supply adequacy threats through the use of more interventionist tools (e.g. by issuing directions) that could have a range of adverse effects on the market.

A.4 The process to date

On 20 March 2025, the Commission published a notice advising of the initiation of the rule making process and consultation in respect of the rule change request.¹³⁴ The Commission also published a consultation paper identifying specific issues for consultation. The Commission received nine submissions on the consultation paper. Issues raised in these submissions were summarised and responded to in the draft rule determination.

On 26 June 2025, the Commission published a draft rule determination including a draft rule. The Commission received six submissions on the draft rule determination. Issues raised in submissions are discussed and responded to throughout this final rule determination.

¹³⁴ This notice was published under section 303 of the NGL.

B Legal requirements to make a rule

This appendix sets out the relevant legal requirements under the NGL for the Commission to make a final rule determination.

B.1 Final rule determination and final rule

In accordance with section 311 of the NGL, the Commission has made this final rule determination for a more preferable final rule in relation to the rule proposed by the proponent.

The Commission's reasons for making this final rule determination are set out in chapter 2.

A copy of the more preferable final rule is attached to and published with this final determination. Its key features are described in chapter 3.

B.2 Power to make the rule

The Commission is satisfied that the more preferable final rule falls within the subject matter about which the Commission may make rules.

The more preferable final rule falls within section 74 of the NGL as it relates to rules regulating the collection, use, disclosure, copying, recording, management and publication of information in relation to the covered gas industry.¹³⁵

Additionally, the more preferable final rule falls within the matters set out in Schedule 1 to the NGL as it relates to:

- item 66, being the matters to be dealt with in the GSOO and the obligations of AEMO in regard to its preparation, review, revision and publication; and
- item 68 being, in relation to the GSOO, the kinds of information that must be given to AEMO for the GSOO, who must give AEMO the information, the circumstances in which the information must be given, and the procedure for giving the information.

B.3 Commission's considerations

In assessing the rule change request the Commission considered:

- its powers under the NGL to make the final rule
- the rule change request
- submissions received during first round consultation
- stakeholder input received at the public workshop held on 27 March 2025
- the Commission's analysis as to the ways in which the final rule will or is likely to contribute to the achievement of the NGO
- submissions received during second round consultations
- the application of the final rule to Western Australia

There is no relevant Ministerial Council on Energy (MCE) statement of policy principles for this rule change request.¹³⁶

¹³⁵ section 74(1)(a)(iii) of the NGL.

¹³⁶ Under s. 33 of the NEL and s. 73 of the NGL the AEMC must have regard to any relevant MCE statement of policy principles in making a rule. The MCE is referenced in the AEMC's governing legislation and is a legally enduring body comprising the Federal, State and Territory Ministers responsible for energy. On 1 July 2011, the MCE was amalgamated with the Ministerial Council on Mineral and Petroleum Resources. In December 2013, it became known as the Council of Australian Government (COAG) Energy Council. In May 2020, the Energy National Cabinet Reform Committee and the Energy Ministers' Meeting were established to replace the former COAG Energy Council.

The Commission may only make a rule that has effect with respect to an adoptive jurisdiction if satisfied that the proposed rule is compatible with the proper performance of AEMO's declared system functions.¹³⁷ The more preferable final gas rule is compatible with AEMO's declared system functions because it supports the function of providing information and other services to facilitate decisions for economically efficient investment in the covered gas industry in the adoptive jurisdiction.¹³⁸

B.4 Making gas rules in Western Australia

Under the National Gas Access (WA) Act 2009 (WA Gas Act), a modified version of the NGL was adopted, known as the National Gas Access (Western Australia) Law (WA Gas Law). Under the WA Gas Law, the NGR applying in Western Australia is version 1 of the NGR, as amended by rules made by the South Australian Minister for Energy¹³⁹ and rules made by the AEMC in accordance with its rule making powers under section 74 and 313 of the WA Gas Law.¹⁴⁰

The final rule falls within the subject matters about which the Commission may make rules under the WA Gas Act, as it relates to rules regulating the collection, use, disclosure, copying, recording, management and publication of information in relation to natural gas services.¹⁴¹

However, the final rule amends Part 15D and Part 19 of the NGR that do not apply in the Western Australian version of the NGR.

Accordingly, the final rule will not apply in Western Australia.

B.5 Civil penalty provisions and conduct provisions

The Commission cannot create new civil penalty provisions or conduct provisions. However, it may recommend to the Energy Ministers' Meeting or to the Victorian Minister for Energy, Environment and Climate Change that new or existing provisions of the NGR and under *National Gas (Victoria) (Declared System Provisions) Regulations* be classified as civil penalty provisions or conduct provisions.

The more preferable final rule does not amend any clauses that are currently classified as civil penalty provisions or conduct provisions under the *National Gas (South Australia) Regulations* or the *National Gas (Victoria) (Declared System Provisions) Regulations*.

The Commission does not propose to recommend to the Energy Ministers' Meeting or to the Victorian Minister for Energy, Environment and Climate Change that any of the proposed amendments made by the more preferable draft rule be classified as civil penalty provisions or conduct provisions.

¹³⁷ 295(4) of the NGL.

¹³⁸ Section 91BA(1)(d) of the NGL.

¹³⁹ The Statutes Amendment (National Energy Laws) (Binding Rate of Return Instrument) Act 2018 and the National Gas (South Australia (Pipelines Access—Arbitration) Amendment Act 2017.

¹⁴⁰ See our website for further information at <https://www.aemc.gov.au/regulation/energy-rules/national-gas-rules/western-australia>.

¹⁴¹ Section 74(1)(a)(iii) of the WA Gas Law.

Abbreviations and defined terms

AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
Commission	See AEMC
DTS	Declared Transmission System
DWGM	Declared Wholesale Gas Market
ECGS	East Coast Gas System
ECMC	Energy and Climate Change Ministerial Council
GS00	Gas Statement of Opportunities
LNG	Liquefied Natural Gas
MCE	Ministerial Council on Energy
NEM	National Electricity Market
NGL	National Gas Law
NGO	National Gas Objective
NGR	National Gas Rules
PASA	Projected Assessment of System Adequacy
Proponent	The individual / organisation who submitted the rule change request to the Commission
RSA	Reliability and supply adequacy
VGPR	Victorian Gas Planning Report