



EnergyAustralia

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Australian Energy Market Commission

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Dear Commissioners

Lodged electronically: www.aemc.gov.au (GPR0003)

East Coast Wholesale Gas Market and Pipeline Frameworks Review, Information Provision Working Group Discussion Papers

EnergyAustralia welcomes the opportunity to make a submission on the information provision working group discussion papers. EnergyAustralia is one of the country's leading retailers, providing gas and electricity to more than 2.6 million customers. We own and operate a range of generation and storage facilities, including coal, gas and wind assets, in NSW, Victoria and South Australia.

Meeting 1: Role of information and information requirements of the east coast gas market

The Bulletin board should aim to provide a comprehensive view of the physical flows of gas. Sophisticated users of gas market data will rely on raw data which allows for ad hoc analysis and customisation of how it is presented to traders. Generally more detailed information should be published in a raw format but only basic information shown visually on the bulletin board landing page.

Pipeline pricing data, secondary trades, and trading hub prices should not be the focus of the Bulletin Board. Basic hub price information could be made available for casual users but the landing page should not be overly complicated.

Please also see our submissions to the Enhanced Information for Gas Transmission Pipeline Capacity Trading rule change which outlines some additional information we believe is required.

Price transparency

We are not certain the ABS price index would be used by our business.

There is no need for a single place for all pipeline and storage pricing data as pipelines are generally not directly comparable. In making a decision about purchase of capacity, much more than price needs to be taken into account. This information will not be available on the bulletin board but through the pipeline owner's website or through conversation with commercial staff. Terms and conditions in a pipeline contract will be just as important as price.

Upstream

Information on exploration activities, reserves, and uncontracted gas could help to support gas supply contract negotiations and policy making.

LNG

Reporting on export volumes may not be necessary as pipeline flows to the facilities are already provided.

Planning and investment related information

A page of links to relevant documents and reports must be kept up-to-date and will not likely be participants' only source for this information. We do not believe this is necessary.

Incomplete information on the Bulletin Board

Exemptions have the potential to create gaps in the information and reduce the clarity of where gas is flowing. The size threshold could be re-examined to ensure it is appropriate.

Currently it can be unclear what some published data represents. More detailed data and descriptions of the information would assist participants.

Meeting 2: Impediments to information provision.

The objective of the bulletin board should be expanded beyond just presenting an accurate picture of inputs and withdrawals across the system on a daily basis. The purpose is to support portfolio optimisation and investment decisions which require more than historical usage data. Storage levels, reserves, capacity outlooks are not captured under the proposed objective.

Exemptions from reporting obligations should be tightened to ensure an accurate representation of physical flows. The AEMC should consider lowering the reporting threshold and capturing information from some currently exempt or non-Bulletin Board pipelines and facilities.

Meeting 3: Improving the accuracy and timeliness of information reported on the Bulletin Board. This meeting also re-examined the purpose of the Bulletin Board

Data accuracy is important for participants to have the confidence to make commercial decisions based on that information. Guidelines and standards around

what data represents would assist reporting entities, users of the data, and for the AER to assess compliance. For example, planned production outages should be updated as soon as new information is available similarly to the NEM's MT PASA obligations.

Meeting 4: Bulletin Board governance and cost recovery

We were represented in person at this working group.

If you any have further questions please contact me on (03) 8628 4518 or at Ben.Hayward@EnergyAustralia.com.au.

Regards

A handwritten signature in black ink, appearing to read 'Ben Hayward', written in a cursive style.

Ben Hayward

Industry Regulation