

## AUSTRALIAN ENERGY REGULATOR MARKET MONITORING INFORMATION ORDER – GAS | CONSULTATION DRAFT

Australian Energy Producers | 19 December 2024

Australian Energy Producers welcomes the opportunity to provide input into the Australian Energy Regulator (AER) draft Market Monitoring Information Order – Gas (MMIO-GAS).

**Australian east coast gas producers face significant reporting requirements from a range of Federal and State departments and agencies.** Cumulatively, these monitoring and reporting actions represent a growing administrative burden. To meet these increasing regulatory requirements, gas producers are dedicating additional resources to reporting which ultimately adds to the cost of producing gas for Australian households and businesses.

**It is essential that the AER Wholesale Gas Market Report is scoped and implemented in a way that adds value to the operation of the east coast gas market.** The implementation of the Wholesale Gas Market Report represents an additional reporting requirement for east coast gas producers. The additional reporting burden must be commensurate with the improved operation of the east coast gas market, over and above existing reporting and market monitoring processes such as the Australian Competition & Consumer Commission (ACCC) Gas Inquiry.

**Australian Energy Producers welcomes the steps taken by the AER in the draft MMIO-GAS to minimise the additional reporting burden presented by the Wholesale Gas Market Report.** The proposed MMIO-GAS reflects efforts from the AER, in consultation with industry, to improve harmonisation and reduce duplication with existing east coast gas market reporting requirements. In particular, Australian Energy Producers welcomes the decisions:

- **To not prescribe a standardised reporting template**, instead allowing gas producers to submit in a format aligned with internal and/or existing reporting processes.
- **To allow for the submission of full contracts**, rather than requiring gas producers to extract contract information into templates. Noting, where full contracts cannot be provided, or where it would represent a risk to commercially sensitive information, industry would request scope for alternative approaches to be agreed with the AER as needed.
- **To limit the collection of historical data to December 2023.**

Australian Energy Producers recommends that the AER consult with industry before implementing any amendments or additions to future notices, to ensure the MMIO-GAS process continues to minimise the additional reporting burden on gas producers.

**Australian Energy Producers recommends that the timing of the MMIO-GAS is aligned with the related ACCC Gas Inquiry data requests.** To ensure the benefits of not prescribing a

standardised reporting template are realised in practice, the MMIO-GAS timing should be aligned to occur soon after related ACCC Gas Inquiry data requests. This will allow a simple review and re-submission of the Gas Inquiry data to the AER. Should the timing of the MMIO-GAS request deviate or drift over time from the ACCC data request, it could significantly increase the reporting burden presented by the MMIO-GAS.

**The confidentiality and commercial sensitivity of data should be maintained through agreed data aggregation, analysis and presentation approaches.** A better understanding of how the data provided will be analysed and presented is necessary to ensure the confidentiality and commercial sensitivity of the data is maintained in the Wholesale Gas Market Report. To achieve this efficiently, it is recommended that the presentation format of data in the final report is standardised and agreed with industry in advance. Where data is used for other purposes, such as in special reports, the data and analysis presentation format should be agreed on a case-by-case basis with industry.

It is recommended that the handling and storage of data by the AER is aligned with the current practices of the ACCC.

**Australian Energy Producers recommends that access to the AER data portal is opened to users as soon as possible, and well in advance of the first official notice, to allow for familiarisation and testing of the system.** New data submission and validation systems can be expected to have implementation issues in their initial roll-out. Working with gas producers to test the uploading and validation system well in advance of the formal implementation will ensure these issues can be identified and resolved as efficiently as possible.

**Australian Energy Producers welcomes the ongoing engagement with the AER on east coast gas market reporting.** For further information, please contact Brendan Beck, General Manager Policy at [bbeck@energyproducers.au](mailto:bbeck@energyproducers.au).