

ACCC 2025 GAS NOTICES | CONSULTATION

Australian Energy Producers | 17 March 2025

Australian Energy Producers welcomes the opportunity to provide feedback to the Australian Competition and Consumer Commission (ACCC) on the draft 2025 gas information notices.

Australian east coast gas producers face significant reporting requirements from a range of Commonwealth 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 having to dedicate additional resources to reporting.

Australian Energy Producers welcomes ACCC's efforts to minimise the additional reporting burden presented by the 2025 gas notices. Key aspects of minimising additional reporting burden include sharing information between agencies where possible, harmonisation of definitions, scope, frequency, timing, reporting period and format of requests, as well as engagement in advance of new/revised notices.

Recommendations for the proposed 2025 gas notices include:

- **Regulatory agencies to share information requests where possible** | Given there is significant overlap in the reporting requirements of different regulatory agencies, it is recommended that ACCC look for opportunities where information can be shared between agencies. Such an opportunity may exist between the Australian Energy Market Operator (AEMO) Gas Statement of Opportunities (GSOO) survey and the ACCC long-term forecast requests which essentially request the same information. Allowing for the sharing of information between AEMO and ACCC would be very welcome.
- **Harmonisation of information requests between agencies** | Where sharing information between agencies is not possible, aligning the timing, definitions, notice periods and format of requests would be highly valuable. For example, aligning ACCC long term forecasts and new gas supply project details information requests with AEMO GSOO requests, by using an identical spreadsheet and having both requests coming out at the same time each year (due ~ October each year) would be a significant improvement on the current approach.
- **Flexibility on the quarterly/report-specific reporting** | It is recommended that the notices allow for both consistent quarterly reporting and report-specific reporting to accommodate different gas producers' internal processes. This can be accommodated by having notices specify report-specific reporting as a minimum, but that consistent reporting would also be accepted. Both options need to be explicitly referenced in the notices to avoid risk of gas producers breaching privacy rules by voluntarily providing information that hasn't been requested.
- **Certainty on notices is highly valued** | Establishing an annual schedule of notices well in advance of the reporting period is very welcome. Any changes to reporting processes or schedules should then be implemented annually between reporting schedules with sufficient consultation well in advance of implementation.

Australian Energy Producers welcomes the ongoing engagement with the ACCC on east coast gas market reporting. For further information, please contact Brendan Beck, General Manager Policy at bbeck@energyproducers.au.