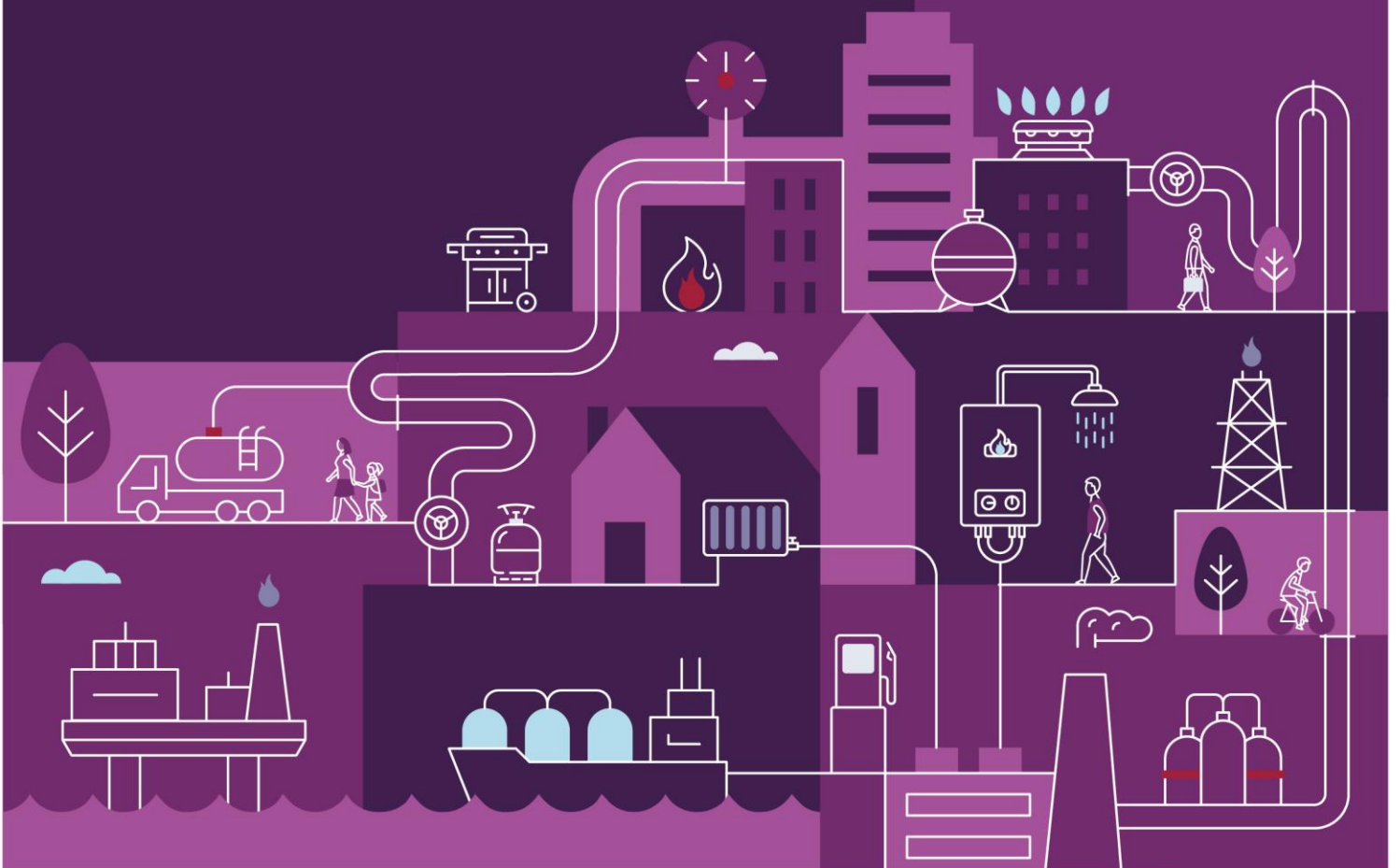
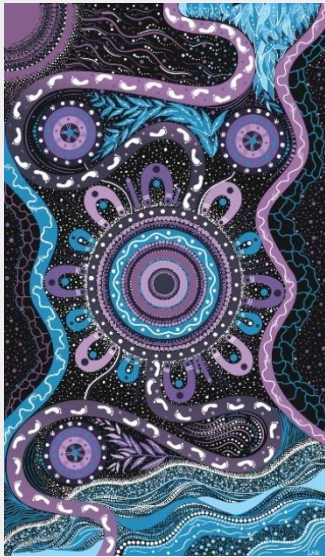




# March 2025

# A biennial review of the Gas Bulletin Board





We acknowledge the Traditional Custodians of the land, seas and waters across Australia. We honour the wisdom of Aboriginal and Torres Strait Islander Elders past and present and embrace future generations.

We acknowledge that, wherever we work, we do so on Aboriginal and Torres Strait Islander lands. We pay respect to the world's oldest continuing culture and First Nations peoples' deep and continuing connection to Country; and hope that our work can benefit both people and Country.

'Journey of unity: AEMO's Reconciliation Path' by Lani Balzan

AEMO Group is proud to have launched its first [Reconciliation Action Plan](#) in May 2024. 'Journey of unity: AEMO's Reconciliation Path' was created by Wiradjuri artist Lani Balzan to visually narrate our ongoing journey towards reconciliation - a collaborative endeavour that honours First Nations cultures, fosters mutual understanding, and paves the way for a brighter, more inclusive future.

## Important notice

### Purpose

This publication has been prepared by AEMO, pursuant to rule 149 of the National Gas Rules, using information available at October 2024. Information made available after this date may have been included in this publication where practical.

### Disclaimer

This document or the information in it may be subsequently updated or amended. This document does not constitute legal or business advice and should not be relied upon as a substitute for obtaining detailed advice about the National Gas Law (NGL), the National Gas Rules (NGR), or any other applicable laws, procedures, or policies. AEMO has made every effort to ensure the quality of the information in this document but cannot guarantee its accuracy or completeness.

Accordingly, to the maximum extent permitted by law, AEMO and its officers, employees and consultants involved in the preparation of this document:

- make no representation or warranty, express or implied, as to the currency, accuracy, reliability or completeness of the information in this document; and
- are not liable (whether by reason of negligence or otherwise) for any statements or representations in this document, or any omissions from it, or for any use or reliance on the information in it.

### Copyright

© 2025 Australian Energy Market Operator Limited. The material in this publication may be used in accordance with the [copyright permissions on AEMO's website](#).

# Executive summary

This biennial report provides a review of the Gas Bulletin Board (GBB) and an assessment of the functionality, usability and effectiveness of the GBB website. As required by the National Gas Rules (NGR), AEMO has prepared this report in consultation with GBB users, the Australian Energy Regulator (AER) and the Australian Energy Market Commission (AEMC), and has made recommendations for change.

## Work program over the review period

Within the review period of October 2022 to September 2024, major changes were made to the GBB due to the regulatory amendments to increase transparency in the gas market (Gas Transparency Measures [GTM]). The GTM included changes to GBB submissions reports published by AEMO.

## Stakeholder consultation and desktop review

For this review, AEMO:

- prepared an online survey and received 42 responses from the following stakeholders:
  - GBB users
  - facility operators
  - market participants
  - government stakeholders, and
  - stakeholders from other market and regulatory bodies
- undertook one-on-one interviews with the AER, AEMC and the Department of Climate Change, Energy, the Environment and Water (DCCEEW), and
- undertook a desktop review of updates to the GBB, including an assessment of website statistics.

Stakeholder interest in this review was higher than the previous review undertaken in 2022, when there were 17 responses to the survey. AEMO believes this is due to the GTM, which required:

- increased submissions to AEMO by market participants and facility operators, and
- new reports that have been published by AEMO.

## Consultation findings

Survey responses received in this review were generally positive about the functionality, usability and effectiveness of the GBB. Over 74% of users who access the GBB do it on a daily or weekly basis, and the most utilised reports were Actual Flow and Storage, Pipeline Connection Flow and Capacity Outlooks (both short and medium term).

Most participants understood their new reporting obligations under the GTM, however feedback received from respondents largely focused on concerns with submitting data, such as having the system be able to handle more complex and index linked-pricing short-term transactions and providing more submission templates. There was

also feedback received on reports published on the GBB, particularly with the usefulness of short-term transaction reporting and ways it could be improved by amending the aggregation methodology.

## Recommendations

The recommendations made in this report are largely focused on ways to increase the usefulness and utilisation of the reports published. This may require changes to AEMO IT systems, amendments to existing procedures and potentially the NGR.

## Future work program

The GBB will see change through the implementation of the National Gas Amendment (Other Gases) Rule 2024 which will incorporate renewable gas reporting on the GBB from 3 March 2025. Further, the additional monitoring and communication tools that will be implemented as part of Stage 2 of the Reliability and Supply Adequacy reforms is likely to expand the data and information reported on the GBB.



# Contents

Executive summary	3
1 Overview	7
1.1 Scope of the 2024 Biennial Report	7
1.2 Review process	7
1.3 User types	8
1.4 Gas Bulletin Board website	8
2 GBB development	11
2.1 Gas Transparency Measures	11
2.2 Stage 1 Reliability and supply adequacy reforms	12
3 Consultation and analysis	14
3.1 Statistics	14
3.2 Stakeholder survey	14
3.3 Key survey findings	16
3.4 Stakeholder interviews	18
4 Website statistics	21
5 Upcoming changes	23
5.1 Renewable gas reporting	23
5.2 Stage 2 reliability and supply adequacy reforms	23
6 Recommendations	25
6.1 Improve utility of short-term transaction and swap transaction information	25
6.2 Reserves and resources information	26
6.3 Improve GBB user experience	26
A1. GBB transactions over time	27
A2. Detailed survey feedback	31

## Tables

Table 1	GBB user types	8
Table 2	Summary of reporting obligations for different BB reporting entity types	11
Table 3	ECGS reporting obligations for reporting entities	13
Table 4	Submissions	27
Table 5	Reports	28
Table 6	Additional survey feedback	31



## Figures

Figure 1	Types of GBB users that responded to the survey	15
Figure 2	GBB website page views	21
Figure 3	Active users of GBB data pages	22

# 1 Overview

This Biennial Report provides an overview of the operation of the Gas Bulletin Board (GBB) during the review period and provides recommendations to improve the functionality and effectiveness of the GBB.

The GBB website<sup>1</sup> provides both historical and forward-looking information on all registered gas facilities and transmission pipeline networks in Australia (except remote facilities and Western Australia<sup>2</sup>). The GBB was established in mid-2008 under the National Gas Law (NGL) and the National Gas Rules (NGR).

## 1.1 Scope of the 2024 Biennial Report

Pursuant to NGR 149, AEMO is required to prepare a report about the GBB at least once every two years. This Biennial Report seeks to assess and review the functionality and effectiveness of the GBB including any reforms over the previous two years and recommend potential improvements.

AEMO is required to consult with GBB users, the Australian Energy Regulator (AER) and the Australian Energy Market Commission (AEMC) to prepare a report that includes:

- a summary of AEMO's program of work to maintain the GBB over the review period and on a forward-looking basis
- performance and usage statistics
- any recommendations for improvements, and
- any other information that AEMO considers relevant.

## 1.2 Review process

This Biennial Report covers the period from 30 September 2022 to 22 October 2024. To conduct the review, AEMO:

- analysed website statistics and specific download data from the GBB to assess the effectiveness of improvements made to the GBB
- issued a 42-question survey to GBB users and reporting entities to obtain feedback on their interactions with the GBB, and
- invited all interested stakeholders to contact AEMO for interviews. AEMO conducted interviews with all three organisations who responded (the AER, AEMC and the Department of Climate Change, Energy, the Environment and Water [DCCEEW]).

---

<sup>1</sup> At <https://www.aemo.com.au/energy-systems/gas/gas-bulletin-board-gbb>.

<sup>2</sup> The Western Australian jurisdiction is covered under a different set of regulatory instruments, and a separate GBB (the WA GBB) is in place for reporting. The WA GBB is located at <https://gbbwa.aemo.com.au/#home>.

## 1.3 User types

This review has revised the categories used in the 2022 Biennial Report as a result of the changes to rule definitions from the GTM reform. The revised user types are:

- **BB reporting entities** – BB reporting entities are obligated to register in the GBB and submit data at prescribed intervals (daily, monthly, annually, and ad hoc). As a result of the GTM, some entities that were previously in the market participants category only are now required to register and report information to the GBB and therefore will now be included as GBB Reporting Entities, such as Gas Sellers and LNG export facility operators.
- **Market participants** – retailers, shippers, large users and brokers who are predominantly users of information published on the GBB and download the data through automated systems or directly from the website.
- **Other interested parties** – consultants, on-sellers of information, government, media and regulatory bodies interested in GBB information. Some automatically download the data and analyse the data through in-house tools, but many usually access data through the GBB website. These users range from those looking for a specific piece of information or to perform ad hoc analysis through to more intensive users who perform detailed analysis on the data.

For the 2024 Biennial survey, AEMO asked respondents to identify themselves in specific sub-categories to more thoroughly understand the types of users that access the GBB and their perspectives on it. These sub-categories are presented in Table 1.

**Table 1 GBB user types**

GBB reporting entities	Market participants (non-BB reporting entities)	Other interested parties
Pipeline operator	Data users	Government and regulatory bodies
Production facility operator	Shippers	Industry associations
Storage facility operator	Large Users	Consultants
Compression facility operator	Brokers	On-sellers of information
Auction facility operator	Retailers	Media
Large user facility operator		
LNG export facility operator		
Facility Developer		
Field Owner		
Gas Seller		

## 1.4 Gas Bulletin Board website

The GBB facilitates data exchange between GBB reporting entities and AEMO's GBB platform. Reporting entities in the east coast gas market who meet the threshold set out in the NGR must register in the GBB and report the required information.



Users can download GBB data from the website. Additionally, registered participants in an AEMO facilitated gas market can integrate GBB data into their own systems via AEMO's application programming interfaces (APIs) which serve as the interface between the GBB data model and user systems..

AEMO's website hosts the GBB which, since the implementation of the GTM changes in 2023, contains the following pages:

- **Gas Bulletin Board (GBB)** – this is the landing page for the GBB. This section of the website contains links to the other GBB pages as well as links to commonly used features such as the interactive map.
- **About the Gas Bulletin Board (GBB)** – this page provides a high-level background of the GBB including frequently asked questions (FAQs) and information on how to interpret the map information.
- **Data (GBB)** – this section of the website consolidates all data and information required for publication under Part 18 of the NGR and provides a centralised location where users can view and access data through several tools and features:
  - **The GBB interactive map** allows users to explore real-time and historical gas market data visually through a map-based interface. Users can select a variety of views, such as pipeline flow, production capacity, daily storage capacity and a summary of a select few facilities on the east coast.
  - **The data dashboard** presents forecast and actual gas production, pipeline deliveries and gas storage levels for BB facilities. It features interactive tools that allow users to view 7-day forecasts and historical data.
  - **The gas flows and capacity outlooks** relate to forecast and historical gas flows, and capacity outlooks for both the short- and medium-term.
  - **LNG and short term transactions** provide information relating to liquefied natural gas (LNG) shipments and short term gas transactions for each state/territory, excluding those transactions that are conducted through the Gas Supply Hub (GSH), the Short Term Trading Market (STTM) or the Declared Wholesale Gas Market (DWGM).
  - **Reserves and resources reporting and facility developments** contains information relating to gas field reserves and resources as well as facility developments.
  - **Capacity trading and auction reports** contains reports and other information relating to Pipeline Capacity Trading (PCT) and the Day-Ahead Auction (DAA) for contracted but un-nominated capacity.
  - **LNG maintenance** provides historical LNG maintenance notices issued by LNG Producers prior to the implementation of the Gas Transparency Measures. This section has been retained for historical reference only, given LNG facilities now report on their maintenance in the short term and medium term capacity outlook reports.
  - **Standing data and notices** contains participant and facility standing data, the Transportation and Service Point Register, Shipper lists, allocation registers and BB notices.
  - **GBB data 2008 to 2018** contains archived data and notices from the old GBB website.
- **Procedures, policies and guides** – the BB Procedures, BB Data Submission Guide, Guide to GBB Reports and BB Aggregation Methodology can be found in this section of the website. These procedures and guides govern

the operation of the GBB. This section also contains GBB FAQs, GBB interactive map help and previous Biennial Reports.

- Register in the Gas Bulletin Board – this page includes registration activities for BB reporting entities, BB reporting agents and gas sellers. It provides administrative information, documents, processes, and requirements for participating in the GBB.
- GBB facility registration – this page provides details for the various activities required to register or deregister a BB facility or BB field, including exemptions and eligibility for exemptions.

## 2 GBB development

During the review period, two major reform packages expanded reporting obligations under the NGR (see Appendix A1):

- the GTM significantly expanded reporting obligations under Part 18, and
- the East Coast Gas System (ECGS) reforms established new reporting obligations under the new Part 27 of the NGR.

While some Part 27 information is confidential and is only available to AEMO, GBB systems are used to receive and validate submissions from relevant entities. Future anticipated reforms, particularly the potential publication of Projected Assessment of System Adequacy (PASA) for the east coast gas system (discussed in section 5.2), are likely to involve further changes to the GBB.

### 2.1 Gas Transparency Measures

On 23 June 2022, the *National Gas (South Australia) (Market Transparency) Amendment Act 2022* was passed by the Legislative Council and House of Assembly in the jurisdiction of South Australia. The GTM came into effect on 30 June 2022.

The GTM sought to enhance transparency in the eastern and northern gas markets, addressing information gaps and asymmetries relating to:

- gas market segment – information deficiencies
- gas and infrastructure prices – information on production costs, wholesale, and retail gas prices
- supply and availability of gas – information on reserves and resources, contracted reserves, drilling activities and liquefied natural gas (LNG) imports
- infrastructure used to supply gas to end-markets – information on available capacity, infrastructure development, compression service availability, and in relation to LNG import facilities, and
- demand – gas use by LNG export facilities and large gas users.

The expanded reporting obligations on market participants under Part 18 of the NGR due to the GTM are summarised in Table 2.

**Table 2 Summary of reporting obligations for different BB reporting entity types**

Participant / facility type	Storage facility	Pipeline	Compression facility	Capacity seller	Gas seller	Large user facility	LNG export facility	LNG import facility	Field owner	Facility developer
Daily production and flow						•	•	•		
Daily storage								•		

Participant / facility type	Storage facility	Pipeline	Compression facility	Capacity seller	Gas seller	Large user facility	LNG export facility	LNG import facility	Field owner	Facility developer
Nameplate rating						●	●	●		
Short term capacity outlook							●	●		
Medium term capacity outlook							●	●		
Nominations and forecasts								●		
Uncontracted capacity outlook								●		
Shipper list	●	●	●							
Short term transaction					●					
Storage capacity transaction				●						
LNG transaction					●					
LNG shipment							●	●		
Gas field interest detail									●	
Gas field interest									●	
Facility development										●

## 2.2 Stage 1 Reliability and supply adequacy reforms

The National Gas Amendment (East Coast Gas System) Rule was made on 28 April 2023 and came into effect on 4 May 2023. The ECGS includes all Australian states and territories apart from Western Australia. The ECGS reforms extended AEMO's powers and functions to provide it with tools to monitor, signal and manage gas supply shortfalls in the east coast gas market from winter 2023:

- Transparency – new and existing participant disclosure obligations to enable AEMO to assess the likelihood of risk or threat to the reliability or adequacy of gas supply in the ECGS.
  - Signalling – communications to industry about risks or threats to gas supply adequacy and reliability, including the ability for AEMO to hold conferences.
  - Directions – AEMO can give directions relevant entities to maintain and improve the reliability or adequacy of gas supply. This function includes a compensation framework.

- Trading – AEMO can trade in natural gas and services to maintain or improve the reliability or adequacy of gas supply in the east coast gas system using a \$35 million trading fund.

The ECGS rules introduced reporting obligations on Part 27 retailers and expanded reporting obligations on BB large user facilities, LNG export projects, BB facilities<sup>3</sup> and BB pipelines. Table 3 summarises these reporting obligations.

**Table 3 ECGS reporting obligations for reporting entities**

	Part 27 retailer	BB large user	LNG export project	BB facilities	BB pipelines
Seven day expected daily gas demand forecast.	●	●	●		
Proportion of expected daily gas demand sourced from gas markets, trading exchanges or gas supply agreements.	●	●	●		
24-month maintenance outlook and anticipated expected daily gas demand.		●	●		
6-month daily capacity forecast.				●	
Expanded maintenance details – can the facility be recalled to service during and outage.				●	
Seven-day line pack forecast for each line pack zone.					●
Seven-day daily capacity outlooks for each pipeline segment.					●
6-month domestic LNG supply forecast.			●		
6-month LNG export forecast.			●		

<sup>3</sup> All BB facilities (including pipelines), other than BB large user facilities and LNG processing facilities.

## 3 Consultation and analysis

### 3.1 Statistics

Over the review period, AEMO added the following to the GBB:

- 32 new facilities (LNG export, large users<sup>4</sup>, pipeline and compression), bringing the total number of facilities being reported on by participants to 149
- 145 new connection points<sup>5</sup> to BB facilities bringing the total number of connection points being reported on to 1,088, and
- 66 new BB participants (shippers, retailers, facility developers and other reporting entities).

### 3.2 Stakeholder survey

The 42-question survey was open for two weeks from mid-to-late October 2024 to gather user feedback on the usability and effectiveness of the GBB. Invitations to complete the survey were circulated to interested parties via multiple channels, including emails to the Gas Wholesale Consultative Forum (GWCF) and posts on AEMO's social media platforms and AEMO's website. The stakeholder survey emphasised the new submissions and reporting requirements introduced under the GTM.

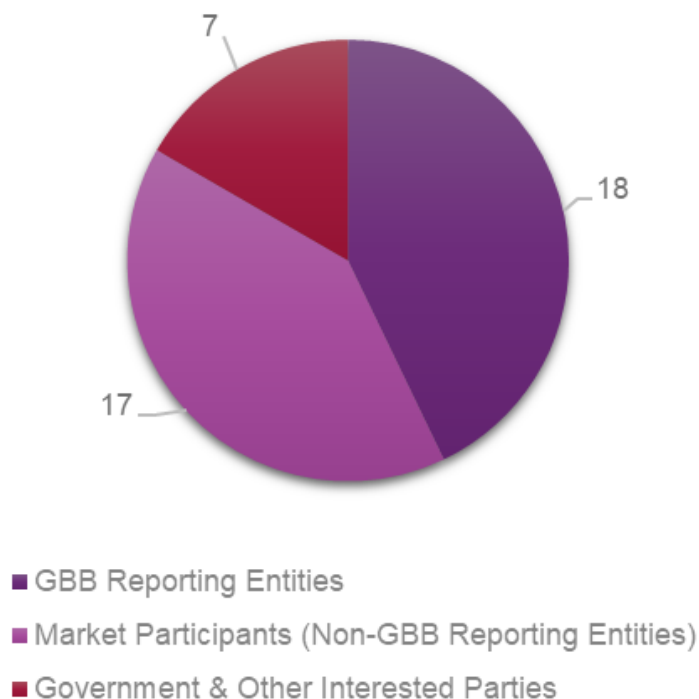
AEMO received 42 responses to the survey. Figure 1 illustrates the breakdown of survey respondents by type.

---

<sup>4</sup> The GTM reforms introduced requirements for large users and LNG exporters to report for the first time to better inform the level of domestic gas supply. For system purposes only, AEMO has created a facility type sub-category under BB large users specifically for gas-powered generators.

<sup>5</sup> A connection point means a delivery point, a transfer point or a receipt point in relation to a BB facility. Connection points are important for market transparency as they represent the location where gas is transferred between different parts of the gas system, ensuring visibility of gas flows and utilisation of gas infrastructure.

**Figure 1** Types of GBB users that responded to the survey



The level of engagement from stakeholders was significantly higher compared to the 2022 review. AEMO attributes this largely to the additional reporting requirements introduced under the two major reform packages – the GTM and the ECGS reforms.

Responses to the stakeholder survey revealed the following insights:

- **access channels** – 71% access the GBB via AEMO’s website, whereas the remainder use internal systems or third-party providers to access the data
- **most utilised reports:**
  - actual flow and storage
  - pipeline connection flow, and
  - short term and medium term capacity outlooks
- **confidence in new reporting obligations:**
  - data submitters expressed confidence in their new reporting obligations under the GTM, giving an average rating of 8.2 out of 10, but feedback suggested that simplifying reporting for short term transactions (STTs) could further ease the process for submitters
  - all facility operators submitting data required under the ECGS rules and Procedures agreed that AEMO clearly communicated the additional reporting requirements, but some facility operators noted ambiguity in interpreting certain aspects of the ECGS rules and procedures – to address these concerns, AEMO encourages stakeholders to reach out via email to the GBB team for clarification or raise issues at the GWCF for further discussion.

## 3.3 Key survey findings

This section provides a summary of the key feedback and corresponding recommendations from respondents who submit GBB data and from respondents who use the data from GBB reports. See Appendix A2 for additional feedback received from individual respondents and AEMO's responses.

### 3.3.1 GBB submission feedback

AEMO received feedback from 15 respondents who submit data to the GBB. Detailed written feedback was provided by 12 participants on ways in which submission information or processes could be improved. This feedback is summarised below.

#### General items

- Most respondents indicated a sound understanding of the new reporting obligations under the GTM.
- There were mixed opinions on the quality and detail of the BB data submission guide with requests to include more examples of data submissions.
- Some respondents believed that the addition of new standing submission templates and improved error messages would aid in submission clarity.

#### Short-term transactions

- A number of comments expressed concern around the process of updating STT records, highlighting that there was a risk of double-reporting. Respondents suggested AEMO could provide additional instructions on how to correct submissions.
- Some respondents stated that the obligation to report transactions within one business day is onerous and not aligned with the AEMO aggregation methodology that results in information being published on a weekly or monthly basis.
- Suggestions were made to update the GBB submission design to handle more sophisticated transactions such as multiple delivery points, variable maximum daily quantity (MDQ) and index-linked pricing.

#### Reserves and resources

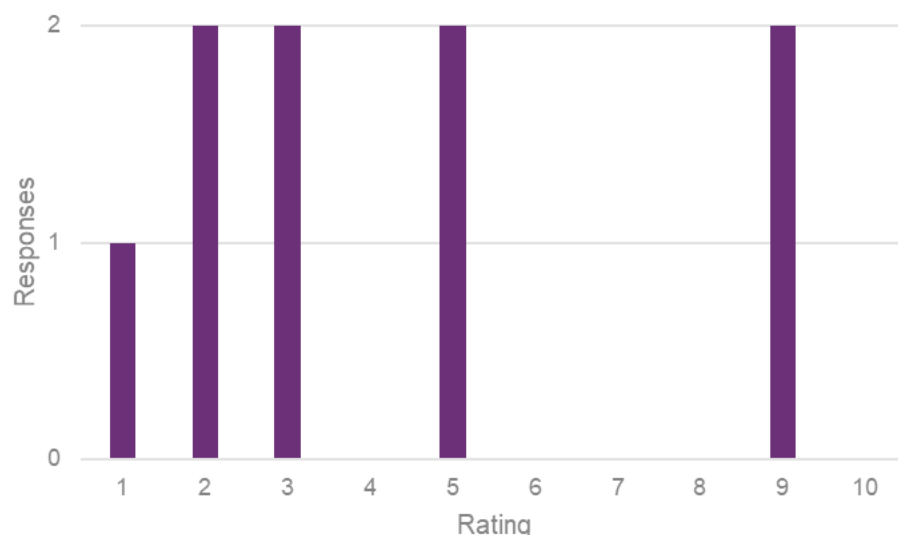
- Respondents said the timeframe of 40 business days after the end of a reporting year to submit reserves and resources data was too short for internal processes and external obligations such as ASX reporting requirements, and suggested that extending the timeframe to report reserves and resources information to 60 business days instead of 40 business days would address concerns for aligning with other timeframes.
- A number of respondents indicated that repeated submission of reserves and resources data to multiple entities (governments, the Australian Competition and Consumer Commission [ACCC] and AEMO) can be burdensome.



### 3.3.2 GBB reports feedback

Users of the new GBB reports developed as a result of the GTM reforms provided feedback and recommendations, summarised below.

#### Short-term transaction (STT) report



- There was mixed feedback on the usefulness of the STT report, with an average rating of 4.3 out of 10, however from the nine survey participants that elected to provide a rating it shows that there is interest in the information, and improvements could be made to provide more insight and value.
- Written feedback suggested that the aggregation methodology limits the usefulness of this report, as the STTs are aggregated with transactions that might be delivered weeks, months or years ahead. As a result, some respondents expressed that the volume weighted average price (VWAP) and the volume values shown in this report do not provide meaningful insights.

#### Short-term swap transaction report

- Some users suggested the utility of the report would increase if the swap price published by AEMO excluded the commodity cost of the swap.
- Respondents said there is no way for them to identify if the executed swap was a time or location swap.
- There was feedback that the aggregation methodology limits the usefulness of this report, as the period of swap delivery cannot be identified.

#### Field interest and field interest information report

- Some users expressed a view that field owners submit inconsistent data to AEMO, which reduces the utility of this report, including:
  - Some organisations incorrectly identified their 'Field Name' as their Authority to Prospect (ATP) number
  - Some fields not adding up to 100% ownership.

- Some fields owned by multiple joint venture (JV) parties have different field definitions for their equity interests.

### Reserves and resources report

- Some users believed data inconsistencies such as different field definitions for equity interests for fields owned by multiple JV parties limit the utility of this report.

### LNG short-term transactions and LNG shipments report

- Limited feedback was received on this report, however the comments provided were appreciative of the transparency AEMO is providing via the GBB.

## 3.4 Stakeholder interviews

In addition to the stakeholder surveys, AEMO held one-on-one interviews with the AER, AEMC and DCCEEW.

### AER feedback and recommendations

The AER's feedback on the GBB highlighted opportunities to address the quality of STTs and reserves and resources reporting to improve the effectiveness of the GTM. Key issues and recommendations are summarised below.

#### Misreporting and failures to report STTs

Key challenges identified by the AER included frequent misreporting, non-reporting and inconsistencies in STT data. Specific issues included mismatches in swap transactions due to incomplete or inconsistent counterparty reporting, missing or duplicated data and errors in published prices. The AER also said that a lack of standardisation in naming conventions for locations and participant names further complicates the accuracy and usability of reported data.

Through its industry consultation and data analysis, the AER identified a range of solutions to enhance compliance, data integrity and market transparency. Enhanced transparency solutions offered by some industry proponents are documented in the AER's December 2023 report and included:

- Publishing the price difference (delta) for swaps (strong industry support).
- Distinguishing between location and time-based swaps in the published prices (strong industry support). Publishing prices against supply periods, including for future years and across seasonal periods (e.g. for time swaps).
- Increasing the frequency of published prices, including extending weekly reporting to other jurisdictions.
- Distinguishing as-available from firm trades in published prices (or ceasing reporting of as-available trades).
- Publishing prices at other locations (not just by jurisdiction).
- Considering further disaggregation of published data, including publication of all transactions.

For its December 2023 report, the AER identified further transparency solutions as well as measures to assist with its compliance monitoring, including:

- Compliance and validation – for swap transactions, requiring both counterparties to report transactions for validation, mandating consistent naming conventions and automating data entry through validation tools to reduce errors; alternatively, requiring only one side of a swap to be reported.
- Transparency enhancements – publishing other transaction details, such as through the mandated reporting of prices against fixed and linked terms; reflecting escalation mechanisms/terms in reported prices; and reporting pricing differences based on take or pay terms.
- Stakeholder collaboration – collaboration between stakeholders such as AEMO, AER and industry participants to refine reporting templates, develop clear guidance and explore potential rule changes

### Challenges in reserves and resources reporting

The AER identified several key challenges in reserves and resources reporting that affect compliance and/or data accuracy. Compliance-related challenges include:

- Feedback from some reporting entities that the 40-business day annual reporting deadline is short, creating administrative burden, including around the proximate deadlines for reporting to the ASX and AEMO.
- Strict qualifications for reserves assessments exclude some highly qualified experts who do not meet the rule-based criteria.
- Small field interest owners can be reliant on information shared by non-related field operators, creating confidentiality issues and compliance dependence.

Data accuracy challenges include:

- Data inconsistencies, such as field interests failing to sum to 100% and mismatches between field- and group-level data hinder the accuracy and usability of the reports.
- The lack of standardised naming conventions for gas fields further complicates cross-referencing and validation efforts, further impacting the quality of reporting.

Potential rule change options identified by the AER included:

- Updating the reporting timeline – extending reporting deadlines to 60 business days to reduce administrative burdens and improve data quality.
- Increasing flexibility in assessments – allowing alternative qualifications for reserves assessors to provide flexibility while maintaining high standards for assessments.
- Broadening arrangements to allow majority interest holders to report some information for whole gas field.

Key improvements identified by the AER to enhance data accuracy and transparency included:

- Improving data accuracy and validation – implementing automated tools to validate field interests and cross check data with external sources, and consolidating reserves and field interest data into unified tables with clear distinctions between historical and current data.
- Enhancing standardisation – mandating consistent naming conventions for gas fields through AEMO's template.



## AEMC feedback and recommendations

The AEMC suggested that supply-demand data should be prominently displayed on the GBB's front page, similar to the existing interactive map feature.

## DCCEEW feedback and recommendations

DCCEEW noted the following areas for improvement in the current functionality of the GBB:

- User experience – improving functionality to allow users to create custom charts, and the integration of public facing APIs to improve data access for a broader audience
- Reporting – resolving double-counting of swaps and including price differentials in GBB reporting
- Role of the GBB in improving market transparency – to collate additional data and analysis for the benefit of market participants, with a view to the GBB developing toward becoming a 'one stop shop' for market transparency. This could include the centralisation of information about live gas offers and expressions of interest for gas supply, and availability of uncontracted gas.

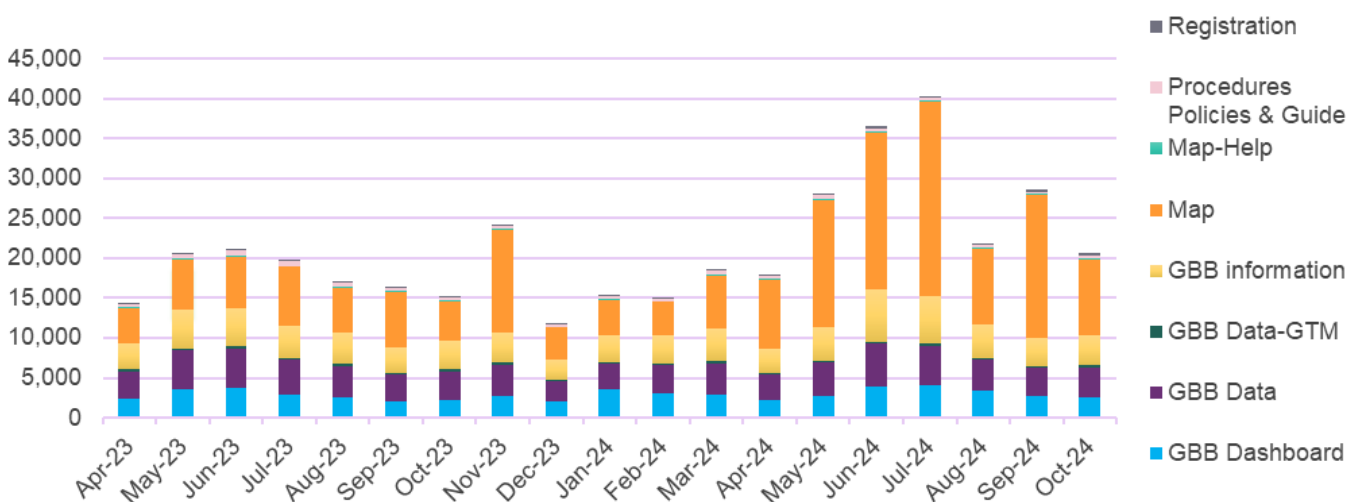
## 4 Website statistics

Due to a change in platforms in 2023, website data could only be retrieved from April 2023 onwards, hence does not cover this whole Biennial Report review period.

For the period 1 April 2023 to 31 October 2024, the GBB accounted for 3.7% of total AEMO traffic. Despite not being a like-for-like comparison, between April 2023 to October 2024, the GBB website received more than 400,000 views compared to approximately 158,000 views during the period of September 2020 to August 2022.

The GBB interactive map was the most visited section, accounting for 45% of total GBB views – an increase of 98% compared to the period covered in the 2022 Biennial Report (Figure 2).

**Figure 2 GBB website page views**

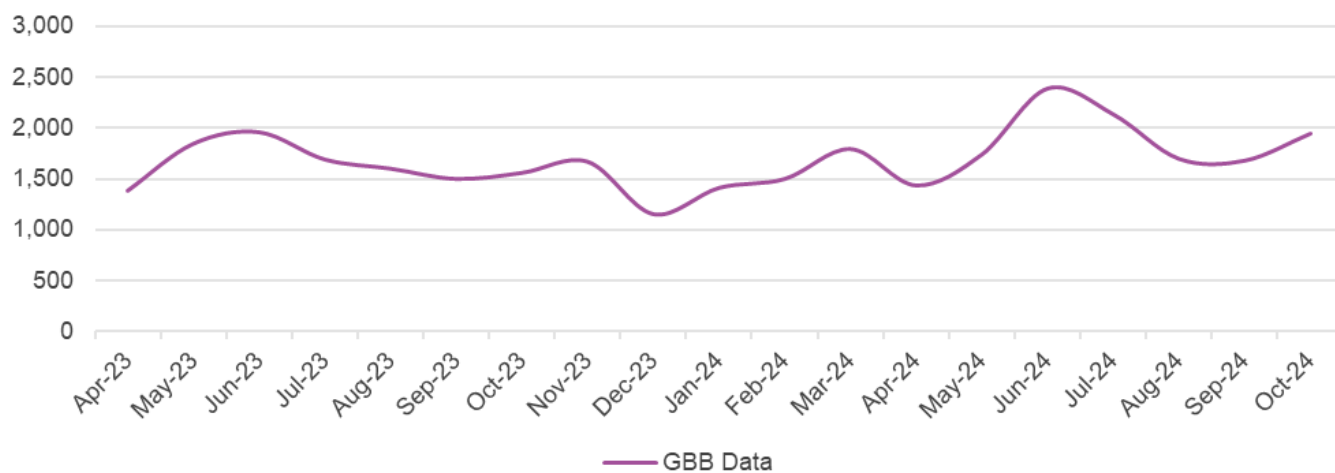


User behaviour shows heightened activity on the GBB map, data, and dashboard pages during the peak demand season and at times of disruption caused by uncertain events, such as the suspension of APLNG's LNG production and exports in late November 2023 (Figure 2), the Queensland Gas Pipeline rupture<sup>6</sup> in early March 2024, and the winter 2024 peak demand period.

GBB data and dashboard views increased by 274% since 2022. Increased data views and site usage indicates that the information is attracting growing interest and is valued by users, especially during peak demand periods, uncertain events, and supply constraints (Active users of GBB data pages).

<sup>6</sup> See <https://aemo.com.au/-/media/files/gas/east-coast-gas-system/east-coast-gas-system---queensland-gas-pipeline-post-intervention-report-december-2024.pdf?la=en>.

**Figure 3** Active users of GBB data pages



## 5 Upcoming changes

### 5.1 Renewable gas reporting

In August 2021, Energy Ministers agreed to extend the national gas regulatory framework to accommodate hydrogen, biomethane and other renewable gases. The National Gas Amendment (Other Gases) Rule 2024 commenced 12 March 2024<sup>7</sup>, and the amendments to Part 18 of the NGR that apply to the GBB incorporating renewable gas changes are scheduled to come into effect on 3 March 2025.

AEMO has completed consultation<sup>8</sup> on the amendments to the GBB Procedures and technical documents which were required to ensure that covered gases are appropriately incorporated. This included amendments to account for the new BB blend processing facilities and BB blended gas distribution systems with a nameplate capacity of 10 terajoules a day (TJ/d) or more into the GBB reporting framework.

AEMO is working towards getting the hydrogen and renewable gas data submission and reporting platform ready in the first half of 2025.

### 5.2 Stage 2 reliability and supply adequacy reforms

Stage 2 of the reliability and supply adequacy framework is currently being progressed and is focused on those elements of the framework that are required to:

- guide and frame how AEMO approaches its new ECGS functions, complementing the Stage 1 reforms with more effective tools to monitor, communicate and respond to threats, and
- facilitate timely and efficient market-led responses by providing industry participants with greater transparency and predictability.

Energy Ministers agreed to progress the following measures:

- a reliability standard used objectively to identify reliability and supply adequacy threats and guide responses to such threats
- additional monitoring and communication tools used to support more timely and efficient responses by market participants to any emerging threats. These include a short- and medium-term PASA, an advance notice of closure requirement for gas supply infrastructure, and an objective threat signalling mechanism
- Additional reliability and supply adequacy management tools for AEMO, and
- Improved alignment of the reliability and supply adequacy framework with the Gas Statement of Opportunities and the Victorian Gas Planning Report.

<sup>7</sup> See Amendment to NGR: <https://www.aemc.gov.au/sites/default/files/2024-03/Other%20Gases%20NERR.pdf>.

<sup>8</sup> See <https://aemo.com.au/consultations/current-and-closed-consultations/amendments-to-gbb-procedures-for-renewable-gas>.

The additional monitoring and communication tools designed to support market participant and AEMO responses are likely to expand the data and information reported on the GBB. Notably, the gas PASA<sup>9</sup> framework is intended to provide market participants with access to a more regular and systematic intra-year assessment of the reliability and adequacy of supply. It may help identify potential breaches of the reliability standard and enable timely and efficient action to address them. Combined with an objective threat signalling mechanism, a gas PASA provides industry, AEMO and policy makers with transparency of the level of response required to address issues ahead of time.

Feedback on GBB reporting obligations under the Renewable Gas reforms, and potentially the Stage 2 Reliability and Supply Adequacy reforms, will be sought in the 2026 GBB Biennial review.

---

<sup>9</sup> A PASA is a supply and infrastructure capacity adequacy assessment that accounts for the supply and the available capacity of infrastructure used in the supply of gas to meet forecast demand for a given period in a defined region and any reliability requirements determined to be applied.



## 6 Recommendations

AEMO has considered the feedback provided by stakeholders during this biennial review as summarised in the consultation and analysis section above. This report makes recommendations to uplift existing GBB functionality and to undertake additional discussions with stakeholders to refine the feedback into actionable pieces of work. The implementation of these recommendations will be subject to a structured prioritisation process, balancing feasibility, regulatory impact and resource allocation.

### 6.1 Improve utility of short-term transaction and swap transaction information

#### Short-term gas transactions

This review highlighted several deficiencies that will need to be addressed for the report to fully realise the intended outcomes of the GTM reforms. Feedback from stakeholders reveals that the current weekly VWAP which aggregates transactions across varying delivery durations limits the utility of the data for price discovery and decision-making.

AEMO recommends further investigation of the following options and potential improvements to address this concern:

- revise the current aggregation methodology to increase utility of the data for price discovery – this may include increased frequency of published prices and reporting prices against fixed and linked terms
- in accordance with industry and AER feedback, explore changes to make the published price data more meaningful:
  - report percentage of contract that is take or pay
  - reflect escalation mechanisms and terms in reported prices which becomes relevant to longer term contracts, and
  - explore options to standardise naming conventions and simplify submissions by BB reporting entities.

#### Swap transactions

AEMO received feedback around the limited utility of the swap transaction report for price insights due to the lack of detail around the period of delivery and the type (time-based or locational) of swap. The AER expressed challenges in identifying and matching both legs of the swap.

AEMO recommends the following to improve the utility of the swap transaction data:

- reporting of separate swap data by term/duration and by location and time for each leg of the swap transaction, and
- as recommended by the AER, a mechanism where one party submits both legs of the swap and the counterparty provides confirmation of the transaction – this will require system changes for both AEMO and market participants.



## 6.2 Reserves and resources information

Stakeholder feedback highlighted concerns around data traceability and suggested that AEMO look at introducing processes to check for inaccuracies.

AEMO acknowledges the feedback and proposes the following:

- consider systemised validation tools to improve quality of reserves and resources information, and
- improve consistency in gas field naming by implementing naming conventions and providing clarifications in the AEMO template.

## 6.3 Improve GBB user experience

Stakeholder feedback highlighted potential user experience improvements to the GBB website. AEMO will review the GBB interactive map and associated web links and assess if there is a need to prioritise changes accordingly.

AEMO will consider improvements to the usability and functionality of the GBB via IT infrastructure upgrades and improved loading times for historical data queries.

# A1. GBB transactions over time

Table 4 Submissions

Submission name	Gas Bulletin Board (Pre-2018)	Gas Bulletin Board (Post 2018)	Gas Bulletin Board (Post 2022)
Short Term Capacity Outlook (Previously capacity outlook)	•	•	•
Linepack Capacity Adequacy (Previously linepack adequacy flag)	•	•	•
Delivery Nomination	•		
Daily Production Flow (Previously actual flow)	•	•	•
Daily Storage (Previously actual storage)	•	•	•
Nameplate Rating (Previously standing capacity)	•	•	•
Shipper's Allocated Aggregated Deliveries	•		
Standing Demand	•		
Transaction Acknowledgement	•		
Connection Point Nameplate Rating		•	•
Medium Term Capacity Outlook		•	•
Nominations and Forecast		•	•
Uncontracted Capacity Outlook		•	•
BB Capacity Transaction		•	•
Auction Curtailment Notice		•	•
Daily Auction Service Curtailment Notice		•	•
Shipper List			•
Short Term Transaction			•
Storage Capacity Transaction			•
LNG Transaction			•
LNG Shipment			•
Gas Field Interest Detail			•

Submission name	Gas Bulletin Board (Pre-2018)	Gas Bulletin Board (Post 2018)	Gas Bulletin Board (Post 2022)
Gas Field Interest			•
Facility Development			•
Expected Daily Gas Demand			•
Linepack Forecast			•
Domestic Supply Forecast			•
Export Forecast			•

Table 5 Reports

Report name	Gas Bulletin Board (Pre-2018)	Gas Bulletin Board (Post 2018)	Gas Bulletin Board (Post 2022)
Facilities (Formerly BB Facilities List)	•		
Zones List	•		
Nameplate Rating (Formerly Standing Capacities)	•	•	•
Standing Peak Demand Forecasts	•		
Linepack Capacity Adequacy	•		
Short Term Capacity Outlook (future) (Formerly Short Term Capacity Outlook (next 7 days)) (Formerly Capacity Outlook)	•	•	•
Forecast Pipeline Flows	•		
Actual Flows 7 Day	•		
Pipeline Connection Flow Last 31 (Formerly Actual Flows Prev Month)	•	•	•
Participants (Formerly Registered BB Contacts)	•	•	•
Contact Details (Formerly Registered BB Participants)	•	•	•
Transaction Log	•		
Actual Flow and Storage (Last 31 days)		•	•
Actual Flow and Storage (All Data)		•	•
Pipeline Connection Flow (All Data)		•	•

Report name	Gas Bulletin Board (Pre-2018)	Gas Bulletin Board (Post 2018)	Gas Bulletin Board (Post 2022)
Nominations and Forecasts (next 7 days)		•	•
Nominations and Forecasts (History)		•	•
Forecast Utilisation		•	•
Forecast Utilisation (history)		•	•
Short Term Capacity Outlook (history)		•	•
Medium Term Capacity Outlook (future)		•	•
Medium Term Capacity Outlook (history)		•	•
Uncontracted Capacity Outlook (future)		•	•
Uncontracted Capacity Outlook (history)		•	•
Linepack capacity adequacy (current) (formerly linepack capacity adequacy)		•	•
Linepack capacity adequacy (history)		•	•
Connection Point Nameplate Rating (Current)		•	•
Nameplate Rating (history)		•	•
Missing Actual Flow and Storage		•	•
Missing Nomination and Forecast		•	•
Late actual flow and storage		•	•
Late nomination and forecast		•	•
Pipeline nil quantity submission		•	•
Capacity transfer and auction notice		•	•
Auction Quantities		•	•
Auction Product Price and Volume		•	•
Revised Auction Quantities		•	•
Auction Service Curtailment Notice		•	•
Secondary capacity trades		•	•
Zone curtailment information		•	•

Report name	Gas Bulletin Board (Pre-2018)	Gas Bulletin Board (Post 2018)	Gas Bulletin Board (Post 2022)
Nodes and Connection Points		•	•
Locations		•	•
Transportation facility register		•	•
Transportation service point register		•	•
Facilities (history)		•	•
Nodes and connection points (history)		•	•
Transportation facility register (history)		•	•
Transportation service point register (history)		•	•
Pipeline connection flow (2018 to 2023)			•
Pipeline connection flow (2023 to 2028)			•
LNG Transactions			•
LNG Shipments			•
Short Term Transactions (NSW, NT, QLD, SA, TAS, VIC)			•
Short Term Swap Transactions (NSW, NT, QLD, SA, TAS, VIC)			•
GSH Trades			•
Field Interests			•
Field Interest Information			•
Reserves and Resources			•
2P Sensitivities (all data)			•
2P Sensitivities (last quarter)			•
Basins			•
Facility development projects			•
Shipper List			•
Allocation Register			•
BB Notices			•

## A2. Detailed survey feedback

Table 6 Additional survey feedback

Issue	AEMO comment
<b>General</b>	
Suggestion to incorporate the GTM FAQ into the Gas BB Procedures document.	The role of a FAQ and a Procedure document differs – a FAQ provides informal guidance and quick answers to common questions, while the GBB Procedures documents outlines more formal requirements dictated by the NGR.
LNG planned outages are difficult to find as they are now in the short term and medium term capacity outlook reports. These were previously published (as a PDF) on the AEMO LNG Maintenance website. Respondents prefer the prior reporting format before the GTM reforms.	LNG producers satisfy the LNG maintenance publication requirement when they provide the required information in MTCO reports. This allows for standardisation of reporting all maintenance at any type of BB facility that is subject to reporting thresholds.
Respondents noted that the existing CSV-based manual submission method is clunky and may increase errors.	The CSV manual submission is a backup process. Automated API submissions are accommodated by AEMO.
<b>Expected daily demand report</b> One respondent questioned the configuration of validations, noting an inconsistency in their application between first and subsequent submissions, with updated submission requirements being more relaxed. Another respondent suggested removal of the validation around supply equalling demand for the expected daily gas demand submission.	Note that the validation is that expected supply must be less than or equal to expected demand where this information is being submitted for the first time for a gas day. This validation does not apply to updates of data for a gas day. The intention of this reporting requirement and validation is to allow AEMO to assess whether there is sufficient supply to meet expected demand. The more flexible validation on subsequent submissions acknowledges potential changes in expected supply-demand dynamics.
<b>Short term transactions</b>	
One respondent expressed that the BB submission form is overly simplistic and does not capture the detail that AEMO expects to be reported. Further, the respondent noted that it is not reflective of how deals are executed and gas delivered.	Note AEMO recommendations in Section 6 of this report to improve STT reporting.
One respondent noted that it was difficult to identify when the reporting of as-available and interruptible transactions become obligations.	Addressed in the GTM FAQ.
<b>Reserves and resources</b>	
One respondent suggested that NGR 171B(6)(b) be updated such that the requirement to update the reserves and resources estimate excludes circumstances where the field owner has simply deducted production from its annual reserves and resources estimate.	AEMO sees the current reporting obligation as being important for transparency. If the current obligation was removed as described, it is likely there will be greater complexity around ensuring reserves and resources estimates are accurate.
One respondent stated that the economic assumptions field was problematic due to the confidential nature of a lot of the information that could be provided and questioned what value it provided, noting that the responses received for this field had been inconsistent.	AEMO acknowledges the concerns regarding the economic assumptions field however notes that this reporting requirement would need to be addressed through the AEMC's rule change process.
One respondent stated that revisions to estimates may be triggered unnecessarily in some situations.	AEMO will endeavour to review whether revisions to estimates may be triggered unnecessarily.