31 July 2026

Gas Industry Company
By email

Submission on the discussion paper on gas governance draft rule changes published 16 June 2026

Thank you for the opportunity to provide feedback on some of the issues raised in the discussion paper. We note this consultation comes as the next step in a process culminating in a Recommendation to the Minister for Energy on Changes to Gas Governance Arrangements ('Recommendation to the Minister') which was approved in early 2025.

As such the scope of this current consultation is limited to drafting and implementation questions. At the workshop on 23 June 2026 there was discussion around how progress would be made after this round of feedback, including scope for further detailed work being required in relation to the drafting in the rules.

We have therefore focussed on more conceptual points with the potential to more widely impact drafting in the expectation that the detailed drafting work will follow.

Allocation Group Definitions

We believe there is an issue with the use of volume limits to assign meters to allocation groups, which appears to have been overlooked previously.

The Recommendation to the Minister included the following concepts:

- Sites which consume more than 20 TJ p.a. will require telemetry (see below)
- Volume limits are introduced in relation to TOU meters allowing a retailer the choice for "small" sites of continuing with daily submissions (AG3) or the option of only providing a monthly submission (AG4).

This table is reproduced from the December 2023 Statement of Proposal.

Analysis indicated that the optimum threshold for upgrading the AG2 ICPs was 20 TJ p.a.

There were a relatively large number of "small" AG2 sites where a retailer will have the choice between AG3 and AG4. However there is one choice which has been removed and that is the option of maintaining the status quo.

Distribution of AG2 ICPs by annual consumption volume (June 2022 to May 2023)

Band (per annum consumption)	No of ICPs	Volume in band (GJ)
>100TJ	1	105,284
80-100TJ	1	87,944
60-80TJ	3	197,044
40-60TJ	11	538,443
20-40TJ	34	912,199
18-20TJ	5	95,872
16-18TJ	16	271,638
14-16TJ	12	179,543
12-14TJ	12	153,986
10-12TJ	17	182,527
<10TJ	79	426,686
Total	191	3,151,167

For current TOU sites consuming less than 10 TJ p.a. this table illustrates this in a different manner.

Current	Proposed	Comment
AG1	AG3	Simple administrative change
AG2	AG3	To continue to use daily data through the allocation process would require the retailer to upgrade to telemetry
	AG4	A retailer could elect to treat this as an AG4 only providing a monthly submission, or downgrade to non-TOU
	n/a	There is no longer option which maintains the status quo of using modelled daily data for the D+1 allocation, followed by submission of daily data for subsequent allocation stages, which may be the retailer preference

Definition of Retailer

The proposed draft rules include a proposal to extend the definition of retailer to also encompass "a consumer who receives gas directly at an allocated gas gate or distribution injection point".

The stated intent is to allow for parties to be allocated gas which has been injected into a distribution network but have this potentially allocated to them at the transmission system level in order not to limit renewable gas sales only to users on the same distribution network. There is also a note in the discussion document that this could also cover new commercial models other than the traditional producer-retailer-consumer relationships.

As EnergyBridge is leading the development of these new commercial models we are supportive of evolving industry arrangements to ensure consistency of treatment across all participants, however we not convinced the drafting as proposed captures this clearly or unambiguously.

D+1 allocation runs and allocation results

The final issue we provide comment on is the question as to whether the morning D+1 run should have the status of an allocation result.

Firmly we are of the view that the morning D+1 run should not be treated as an allocation result, but a requirement for this to take place is essential as the morning D+1 run provides valuable data integrity and trouble-shooting information giving retailers and service providers time to address data issues prior to the actual (afternoon) D+1 run.

Implementation

To ensure sensible progress is made towards implementation we suggest that the GIC, include an effective date in the rules to provide a deadline.

We also recommend that the GIC convene a working group (or groups) with participation that is relevant to the matter being resolved or drafted, representative of the stakeholders impacted, constructively engaged with the topic and with sufficient domain expertise. EnergyBridge is happy to make resources available for working group (or groups) if this would be helpful to the ongoing process.

Thank you for the opportunity to provide feedback on the discussion document and we look forward to the next steps in this process.

Yours sincerely,

Nick McDougall