Please direct all responses/queries to:
Ana Stankovic via ana.stankovic@woodside.com

Woodside Energy Group Ltd
ACN 004 898 962
Mia Yellagonga
11 Mount Street
Perth WA 6000
Australia
T: +61 8 9348 4000
www.woodside.com

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Energy Policy WA
Department of Energy and Economic Diversification
Level 1, 66 St Georges Terrace
PERTH WA 6000

By email: GasNetworkPolicy@deed.wa.gov.au

Proposed changes to the Gas Access Funding Regulations and Local Provisions Regulations, and Improving Coordination between Gas Pipeline Operators and the Australian Energy Market Operator

Woodside Energy (Woodside) welcomes the opportunity to provide feedback on the two gas-related consultations currently being released for public comment by Energy Policy WA within the Department of Energy and Economic Diversification (DEED).

This submission responds to both consultations: the proposed changes to the Gas Access Funding Regulations and Local Provisions Regulations, and improving coordination between gas pipeline operators and the Australian Energy Market Operator (AEMO).

Gas Access Funding Regulations

Woodside understands that the proposed amendments primarily relate to updated cost recovery arrangements reflecting expanded Economic Regulation Authority (ERA) functions, rather than making substantive changes to the pipeline regulations themselves. With that in mind, Woodside offers the following comments:

- **Cost-reflective charging:** Woodside recommends that charges be activity-based, rather than applied equally regardless of asset scale and ERA workload.
- **Cross-subsidisation:** Funding arrangements should include transparent ERA budgets and reconciliation, including refund or offset arrangements where collected standing charges exceed actual attributable costs, with cross-subsidisation between scheme pipelines, non-scheme pipelines, compression facilities, storage facilities and emerging gas infrastructure possible on an as needs basis.
- **Avoid regulatory duplication:** Integrated production, processing, LNG and associated infrastructure should not inadvertently be treated as stand-alone regulated infrastructure where this is inconsistent with the policy intent.
- **Protect investment signals:** New fees, disclosure obligations and ring-fencing requirements should be proportionate and should not unnecessarily increase the cost of investment in gas supply, infrastructure backfill or emerging energy projects.
- **Build in a review mechanism:** Given the ERA's actual workload under the expanded regime is uncertain, charges should be reviewed once there is sufficient operational experience.

Improving Coordination

Woodside understands that the proposal is intended to support AEMO in fulfilling its obligations.

Due to the confidential and market sensitive nature of relevant information, AEMO's information-gathering ability should be limited to information reasonably necessary to undertake its defined functions.

Woodside therefore recommends that the final framework specifies the categories of data that may be requested and provides assurance that robust mechanisms are in place to prevent potential leakage or loss of confidentiality of any information provided.

Once again, thank you for providing the opportunity to provide feedback.

Yours sincerely,



Wojciech Grzech
Vice President, Marketing & Commercial
Woodside Energy Ltd