



30 June 2015

Independent Market Operator
Attn: Group Manager, Development and Capacity
PO Box 7096
Cloisters Square, PERTH WA 6850

Via Email: market.development@imowa.com.au

Dear Erin,

APA Group (APA) welcomes the opportunity to comment on the Draft Report on the 2015 Review of the Gas Bulletin Board Zones, released by IMO on 2 June 2015.

APA broadly supports the report's main recommendations and offers the following comments on the specific recommendations:

Recommendation 1: Remove the definition of GBB Zones from the GSI Rules

APA supports this proposed change, subject to an appropriate governance process being adopted. Any proposed changes need to be kept to a minimum and adequately consider continuity of information from an analysis perspective.

Recommendation 2: Publish nominations and forecasts for individual facilities (in particular, gas production facilities)

APA supports this recommendation in the interests of providing transparent information to all parties in the industry not just certain parties with particular contractual arrangements. The intent of the Bulletin Board is to improve information transparency and this recommendation will help ensure that all parties are equally placed to deal with short term changes in supply and demand dynamics.

Recommendation 3: Capture large user facility data connected to non-GBB Pipelines

APA considers this recommendation would help improve information transparency within the market; however the benefits of this extra information provision need to be weighed against the cost to provide. The introduction of this recommendation will presumably require additional organisations to comply with reporting requirements to those currently reporting. This in turn will create costs to those organisations to develop and implement process and systems as well as introduce new regulatory obligations.

Recommendation 4: Division of the current Dampier Zone

APA supports this recommendation to help improve transparency, subject to any confidentiality requirements.



Recommendation 5: IMO adopt Guidelines for allocation of new pipelines to GBB Zones

APA considers the recommendation to adopt the guidelines as proposed is reasonable.

Recommendation 6: IMO adopt Guidelines for revision of GBB Zones

APA considers the recommendation to adopt the guidelines as proposed is reasonable.

Please do not hesitate to contact the undersigned on 07 3323 6023 should you require any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Jamieson', is written over a horizontal line.

John Jamieson
Markets & Risk Manager