

## Attachment B

## Stakeholder feedback template

### Submission from Origin Energy

The template below has been developed to enable stakeholders to provide feedback on the draft amendments to the NGL, Regulations and NGR. ESOM strongly encourages stakeholders to use this template, so that it can have due regard to the views expressed by stakeholders on each issue.

#### 1. National Gas Law Amendments

Section	Feedback
[Insert section and subsection reference]	
[Insert section and subsection reference]	
[Insert section and subsection reference]	
[Insert section and subsection reference] <a href="#">[insert extra rows if necessary]</a>	

#### 2. National Gas Regulations Amendments

Section	Feedback
[Insert regulation reference]	
[Insert regulation reference] <a href="#">[insert extra rows if necessary]</a>	

### 3. National Gas Rules Amendments

Amendment	Feedback
<b>Part 15B Procedures</b>	
[insert rule and sub-rule reference]	
[insert rule and sub-rule reference] <a href="#">[insert extra rows if necessary]</a>	
<b>Part 15D Gas statement of opportunities</b>	
[insert rule and sub-rule reference]	
[insert rule and sub-rule reference] <a href="#">[insert extra rows if necessary]</a>	
<b>Part 17 Miscellaneous provisions relating to the AER</b>	
[insert rule and sub-rule reference]	
[insert rule and sub-rule reference] <a href="#">[insert extra rows if necessary]</a>	
<b>Part 18 Natural Gas Services Bulletin Board</b>	
[insert rule and sub-rule reference]	
[insert rule and sub-rule reference] <a href="#">[insert extra rows if necessary]</a>	
<b>Part 18A Compression and storage terms and prices</b>	
[insert rule and sub-rule reference]	
[insert rule and sub-rule reference] <a href="#">[insert extra rows if necessary]</a>	

## 4. Policy clarifications

Sections 6.1.1, 7.2.1 and 8.6 of the Consultation Paper set out a number of policy clarifications that have been made since the DRIS was published. If you would like to provide feedback on any of these clarifications, please do so in the table below.

Consultation paper section	Amendment	Issue	Feedback
6.1.1	Rule 143A(2A).	Northern Territory offshore reserves and resources	
7.2.1	Rule 188A(1).	Reporting times for LNG export facilities	
8.6	Rules 182(1), 183(1) and 185(1)	Facility operators reporting of forecast nominations	

## 5. Transitional arrangements

Section 10 of the Consultation Paper sets out the proposed transitional arrangements. If you would like to provide feedback on any of these transitional arrangements, please do so in the table below.

Transitional measure	Feedback

## 6. Incidental amendments to Parts 15B and Part 18 of the NGR

Section 11 of the Consultation Paper sets out a number of incidental rule amendments that have been identified for Part 15B and Part 18 of the NGR. If you would like to provide feedback on any of these incidental amendments, please do so in the table below.

Amendment	Feedback
[insert rule and sub-rule reference]	
[insert rule and sub-rule reference] [insert extra rows if necessary]	

## 7. Proposed civil penalty provisions

Section 12 of the Consultation Paper sets out the proposed tiers for the list provisions in the Law and Rules that are proposed to be classified as civil penalty provisions. These are based on the proposed classification of tiers for the reform of the Australian Energy Regulator Civil Penalty Regime, which was released for public consultation in July 2020. Energy Ministers' approval of the final classification of tiers, Decision Matrix and Concepts Table is anticipated in late 2020 or early 2021. If you would like to provide feedback on the proposed tiers, please do so in the table below.

Section or rule	Feedback on proposed tiers
Rule 153 (1)	It is unclear if proposal is to classify new r 153(1) as Tier 1 or 2. This new r 153(1) is equivalent to existing r158A(1) which has a draft classification of Tier 2.
Rule 156 (2)	<p>"Only subrule 156(1) of the existing rule 156(1) rule has a draft classification of Tier 1. This rule includes the obligation of the new facility owner to register, which is properly regarded as relating to security and safety of supply in the gas system.</p> <p>However, the new proposed r 156(2) is an obligation on ""the person who is no longer required to be registered"" to notify AEMO of that fact within 5 business days. This obligation does not impact on security and safety of supply in the gas system in the same way and should not be classified as Tier 1.</p> <p>The equivalent obligation on the new facility owner to register and notify AEMO on becoming a facility operator following a change event is contained in the new r150 which has a draft classification of Tier 1."</p>
Rule 158 (2)	The existing rule 157 has a draft classification as a Tier 2 obligation. Consistent with that draft classification, and the fact that this is in the nature of a record keeping or administrative process obligation, this should not be classified as Tier 1.
Rule 165 (1)	The existing rules 165(1) has a draft classification as a Tier 2 obligation. Consistent with that draft classification, and the fact that this is in the nature of a record keeping or administrative process obligation, this should not be classified as Tier 1.
Rule 165 (4)	The existing rules 165(4) has a draft classification as a Tier 2 obligation. Consistent with that draft classification, and the fact that this is in the nature of a record keeping or administrative process obligation, this should not be classified as Tier 1.
Rule 171 (2)	This obligation is in the nature of a record keeping or administrative process obligation and is more appropriately classified as Tier 2. This is consistent with the draft classification of the requirement to submit data in accordance with the BB standard in r 165(1) and (4) as Tier 2.
Rule 171 (6)	This obligation is in the nature of a record keeping or administrative process obligation and is more appropriately classified as Tier 2. This is consistent with the draft classification of the requirement to submit data in accordance with the BB standard in r 165(4) (which is described as analogous) as Tier 2.

## 8. Potential duplication reduction in the National Gas Law

While not part of the Draft Bill or within scope of the transparency regulatory impact statement, the table in section 13 of the Consultation Paper identifies a number of areas in the Law that would benefit from the removal of some of the duplication that has emerged over time. If you would like to provide feedback on any of the proposed changes, please do so in the table below.

Item number	Feedback on potential changes