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5 October 2015

Mr Paul Smith  
Chief Executive  
Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235

**RE: Project number GPR0003 (Information Provision Working Group Discussion Paper)**

Dear Mr Smith,

Esso Australia Resources Pty Ltd (EARPL), an affiliate of ExxonMobil Australia Pty Ltd, welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC) Information Provision Working Group Discussion Paper.

EARPL supports the drive to establish a deeper and more liquid gas sales and transportation market in eastern Australia, and believes that this will be facilitated by providing the market with the appropriate type and level of information.

The Discussion Paper considers a vast number of possible additional information provision requirements and changes to the regulatory framework for information provision. We believe that additional work is required to clearly define the objectives and intended outcomes and to carefully assess the costs and benefit of any changes before any firm proposals are made, which should then be offered up for broad industry consultation beyond the working group.

EARPL strongly believes that company specific commercially sensitive information needs to be aggregated or published with an appropriate time delay such that confidentiality is maintained. Otherwise unintended consequences could include the exchange of commercial sensitive information between competitors with the risk of substantially lessening competition in the wholesale gas market.

The discussion paper considers a number of different options to change the purpose of the AEMO Bulletin Board set out in National Gas Rules. The most extreme of these options could vastly expand its current purpose to include enhanced transparency and price discovery in the market and to enable participants to make informed and efficient decisions about consumption, supply, planning, investment, trade and risk management. We strongly caution against such a change, which we believe would be without precedent in any other wholesale gas market in the world, which has achieved liquidity. Bulletin Boards in those markets tend to focus on providing information on open access infrastructure and may also provide aggregated short-term gas trading data.

Further the Discussion Paper questions if the basis for AEMO Bulletin Board cost recovery should be changed. EARPL believes that the Bulletin Board costs should not be borne by production facility operators, who already incur the costs of providing Bulletin Board information and furthermore are not the main beneficiaries of the information published on the Bulletin Board.

EARPL looks forward to continuing to participate in AEMC's East Coast Wholesale Market and Pipeline Frameworks Review. Please contact Mr Andrew Murphy on (03) 9270 3537 if you require clarification or any more information about this response.

Yours sincerely,

A handwritten signature in black ink that reads "Stuart Jeffries". The signature is written in a cursive style with a long horizontal flourish at the end.

Stuart Jeffries  
Manager – Australia Gas Marketing