



3 November 2017

Gas Market Reform Group  
C/- Australian Energy Market Commission  
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Dear Dr Vertigan

**RE: Financial Reporting Guidelines for Non-scheme Pipelines**

Thank you for the opportunity to attend the roundtable on 19 October 2017 and to provide feedback on the GMRG's consultation paper relating to the financial reporting guidelines for non-scheme pipelines.

Currently, Senex is not a user of non-scheme pipeline services. However, we are developing the Western Surat Gas Project near Roma and acreage the Queensland Government recently awarded to us near Wandoan from which all gas produced must be supplied to the domestic market. This means we will likely be a future user of non-scheme pipelines and therefore welcome the development of a reporting framework that will provide new users such as ourselves with increased information to reduce the imbalance in bargaining power when negotiating with transportation services providers.

Finding the right disclosure and reporting balance is important to the long term success of both users and service providers. Therefore, the comments we have provided in response to your questions regarding entity financial statements, pipeline financial statements, recovered capital, weighted average price, certification and confidentiality try to find that balance between ensuring shippers have access to fundamental financial information while ensuring its reporting is not unduly onerous on service providers.

Should you have any questions in relation to this submission, in the first instance please contact Trevor Robertson, Government and Stakeholder Relations Manager (P: 0409 519 639).

Yours sincerely

Ian Davies  
Managing Director and Chief Executive Officer

**Senex Energy Limited**