



BHP Billiton
125 St Georges Terrace
Perth WA 6000 Australia
PO Box J668
Perth WA 6845 Australia
Tel +61 8 6321 0000
bhpbilliton.com

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Independent Market Operator
PO Box 7096
Cloisters Square
Perth WA 6850

Attn: Group Manager, Development & Capacity

Submission 2015 Review of Gas Bulletin Board Zones

Further to the May 2015 draft Marsden Jacobs Report Reviewing the Western Australia Gas Bulletin Board (GBB) zones BHP Billiton is pleased to make a submission.

As the largest seller of gas for the Australian domestic market and as a major energy user we support gas industry reform that creates robust competition and greater transparency for industry participants.

Dampier Zone Reform (Section 3.3.3):

We note that in the Marsden Jacob draft Report two options are proposed to further segment or split the Dampier Zone into smaller zones.

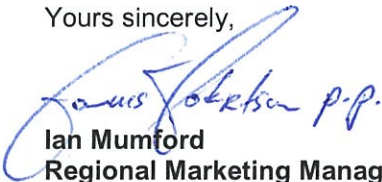
We note that it is expressly recognised in the draft Report that any commercial confidentiality concerns of individual market participants need to be identified and considered. In this respect, it is relevant that, until the Gorgon and Wheatstone domestic gas projects start up, the two proposed Dampier Zone split options will result in production/sales information from the Macedon project being individually reported while the other major suppliers will continue to have their sales information provided on an aggregated basis.

BHP Billiton supports fair, competitive and transparent markets and supports the publication of information by the IMO on a consistent basis for all industry participants.

In the case of the proposed introduction on either a new Gascoyne/Mid-West zone under Option 1 or a New Zone Upper under Option 2, we do not support the proposed introduction of the new zone for the reason that it will at least in the short term result in information relating to the Macedon project being individually reported unlike for other industry sellers whose information will be aggregated.

In the light of the above, we recommend the proposed change be delayed until domestic gas sales from the Gorgon project start resulting in aggregated Mid-West zone numbers being available to the market.

Yours sincerely,



Ian Mumford
Regional Marketing Manager