Revised Final Plan
Attachment 8.6

Response to Draft Decision on Operating Expenditure

August 2025

PUBLIC

Dampier Bunbury Pipeline

1 Response to Draft Decision on Operating Expenditure

We incur opex to undertake activities that allow us to operate and maintain the DBNGP safely, reliably and efficiently. Opex also underpins our customer service. Our response to the ERA Draft Decision seeks to maintain an efficient operating program for our customers into the next AA period amidst the higher cost environment. When combined with the outcome of the opex efficiency factor negative carryover to apply in AA6, forecast net opex performance is only $18 million (or 3%) higher than in AA5.

1.1 Overviews

This attachment sets out our response to the ERA's Draft Decision on operating expenditure (opex) for the DBNGP over the 2026 to 2030 Access Arrangement period (AA5). In particular we are responding to:

Required Amendment 5.1

DBP must amend its operating expenditure forecast to $535 million ($ million real at 31 December 2024) to reflect the values in Table 5.14 of Draft Decision Attachment 5.

The revised Final Plan forecast opex for AA6 is $622 million, which is around $87 million higher than the ERA's Draft Decision, but $30 million below our original Final Plan submitted on 2 January 2025. The key amendments from the Draft Decision are described below:

- Amended salaries expenses forecast (+ $66 million) to reinstate the proposed salary costs including the labour cost rate revision, as proposed in our Final Plan with additional supporting information to support the base year forecast, including benchmarking of DBP's labour cost rate and drivers of cost increases. This proposal should be considered in conjunction with our proposal to include the impact of the labour cost rate update in our opex forecast for the E Factor calculation (where it does not offset regulatory capex), which reduces revenue in AA6 directly by $21.6 million (see Attachment 12.2) and therefore reduces the net impact of the amended salaries and expenses over AA6 from $66 million to $44 million.
- Updated consulting expenses forecast (+ $1 million) for the 2024 actual expenses applied to the average over 2020 to 2024, which is the ERA-approved methodology to forecast the base year.
- Amended government charges expense forecast (+ $2 million) with additional supporting information on rental and power cost increases for the revised base year adjustment of $0.2 million (see Confidential Attachments 8.8).
- Amended insurance step change forecast (+ $5.9 million) with additional information from our insurer to support the product and fee items not included in their original report, which are part of our regular insurance expenses (see Confidential Attachment 8.4a).
- Amended step change forecasts for IT Sustaining Infrastructure (+ $2 million), $0.6 million lower than our Final Plan ($2.6 million) with additional supporting information (see Attachment 9.12)

- Amended step change forecast for IT Sustaining Applications (+ $5.3 million), $2.7 million lower than our Final Plan (+ $8 million) with additional supporting information including emphasis of savings already being achieved from investments in IT (see Attachment 9.12)
- Update the 2024 base year estimate used in the Final Plan opex forecast with the actual expenses incurred in 2024 (+ $1 million)
- Amendment to the allowance for GEA/turbine overhauls to reinstate the lower allowance for premature failures (+$3 million)
- Amended forecast for meter inspections (+ $3 million) in the Inspections and other asset management category to reinstate all inspections in the program of expenditure including those at sites which are not 'existing stations. Refer to Attachment 9.12a for justification.

1.2 ERA Draft Decision

The ERA has not accepted our forecast operating expenditure for AA6 and considers that a value of $535 million satisfies rules 74 and 91 of the NGR.

A significant aspect of the ERA's Draft Decision concerned our increase in wages and salaries expenses in the base year (2024) due to a revision of our internal labour charge out rates. The ERA did not accept any of the increase to our forecast opex for this update, as well as for other salary related cost rises. It also disallowed a large proportion of our proposed IT expenditure in shifting to the cloud-based environment and made various modifications to our other opex item proposals.

It is important to highlight that, although the Draft Decision disallowed these base year expenses, they were still included when determining the Efficiency Factor (E Factor) carryover mechanism amount to be carried forward into AA6. We consider this extends well beyond efficiency requirements under NGR 91(1), creating an over penalty (around $18 million) and ultimately does not allow us to recover our efficient costs. We have also discussed this aspect of the ERA's decision in our Response to the Draft Decision of the E Factor Incentive Scheme (Attachment 13.1).

We have provided a summary of the ERA's Draft Decision on AA6 opex in Table 1.1 below.

Table 1.1: Summary of ERA's Draft Decision on Operating Expenditure

Opex Item	ERA Draft Decision	ERA Comment
Salaries (base year)	Modify	The additional impost for wages and salaries by the labour cost rate adjustment ($7.7 million in 2024) is not justified because the accounting policy change benefits other entities owned by DBP's parent company and DBP unregulated services (as well as regulatory capital expenditure). The five-year average for salary expenses over 2019 to 2023 ($31.8 million) is allowed only, rejecting any additional expenditure for increased staff numbers on the basis that the DBP is in a 'steady state' operating environment. This position also disallows the other salary and superannuation-related increases (for an estimate of $43.0 million in 2026). The total allowed salary expenses (before labour cost escalation) are $158.8 million, $56.0 million less than proposed ($58 million post labour cost escalation).

Opex Item	ERA Draft Decision	ERA Comment
Consulting (base year)	Accept	The estimation method for consulting expenses based on the five-year average (due to annual volatility) is accepted, yielding an estimate of $3.9 million for the base year.
Insurance (base year)	Modify	The base year adjustment for insurance expenses is not supported with the ERA allowing $3.7 million for the base year (rather than $4.4 million proposed) and part of the proposed insurance expense step change only across AA6 (see below). This decision is based on the sum of the premium estimates provided in the insurer's (confidential) report.
IT (base year)	Modify	The base year adjustment proposed (to yield $7.6 million in 2026) is not accepted because the ERA considers that there is no information to justify a level higher than the 2024 estimate for IT expenses ($5.5 million) at the start of AA6.
Government charges (base year)	Modify	The base year adjustment for 'utility rates and taxes' (to yield $5.8 million) is not accepted because the ERA considers that a $1 million annual increase is too high without further information, noting the reasons provided for the increase (higher rent, power and telecommunication costs). It has allowed the 2024 estimate ($4.7 million) for this subcategory at the start of AA6 which brings total Government Charges expenses up to $10.5 million from 2026.
Other expenses in base year	Modify	The remaining base year estimates (based on nine-months of actual expenditure and three months of forecast expenditure) were accepted only if the estimate is below the five-year average (2019-2023) and/or the updated 2024 estimate (based on 12 months of actual expenditure). If not, a lower estimate has been allowed, depending on which category. The combined impact is a reduction of $2.5 million in opex from our base year forecast for these categories.
Trend (real labour cost escalation)	Accept	The trend component in the base step trend approach is accepted with the real labour escalation of 0.67% per annum approved as proposed.
Step change – insurance	Modify	A portion of the proposed step change is allowed for insurance expenses ($3.7 million of $4.9 million proposed) based on the market-based assessment, being the sum of the premium estimates provided in the insurer's (confidential) report. (This report did not include all products and fees in our regular insurance expenses, as was separately provided.)
Step change – IT sustaining infrastructure	Reject	The step change ($1.8 million) for the additional operating costs attached to the new data centre, including higher licensing fees, is not accepted on the basis that there should be an offset from previous server costs no longer incurred, and overall net savings achieved.
Step change – IT sustaining applications	Modify	Most of the step change ($8.3 million) for the additional proposed operating costs for sustaining applications incurred in shifting to the cloud-based environment is not accepted on the basis that more savings should be realised from DBP's investments in IT. The decision to allow $0.8 million over AA6 only also noted that a cost-benefit analysis was not provided to justify the additional spend.
Step change – IT Cybersecurity	Accept	The proposed opex cybersecurity uplift ($2.3 million) is accepted as prudent and efficient expenditure.

Opex Item	ERA Draft Decision	ERA Comment
System Use Gas (SUG)	Modify	The model and assumptions to generate our SUG quantity forecasts are accepted as prudent and efficient, but the assumed throughput and price assumptions have been adjusted for further information from contract outcomes (post Final Plan) and the ERA's demand decision, resulting in a forecast revision to our proposal by $19 million over AA6 (to $98.0 million).
Gas engine alternator (GEA) and turbine overhauls	Modify	Most of the proposed GEA and turbine overhauls expenditure is accepted as prudent and efficient ($29.5 million) but the allowance for premature turbine failure is reduced (by $3.3 million) because the increased preventative maintenance program should result in fewer failures.
Inspections and other asset management	Modify	Most of the proposed expenditure program is accepted as prudent and efficient ($30.1 million) but the allowance for meter station inspections is reduced (by $2.9 million) to match a pro rata share of 'existing station sites' being inspected only. The decision is on the basis that a share of the meter station sites might not be the 26 'existing stations' where maintenance costs cannot be recovered separately from specific shippers (unlike the 39 other inlet and outlet stations where there are separate charges paid by shippers for maintenance). The assumption by the ERA is that the necessary inspections can be at the expense of the contracted shipper at these non 'existing station' sites.

Note: In this 'traffic light' table, green shading represents the ERA's acceptance of our Final Plan, orange represents the ERA's modification of our Final Plan and red shading represents the ERA's rejection of our Final Plan.

1.3 Our Response to the Draft Decision

A summary of our responses to the ERA's Draft Decisions on various opex expenses items and our proposed step changes is contained in Table 1.2. More detail on our reponses is presented in subsequent sections.

Table 1.2: Summary of our response to the ERA's Draft Decision on Operating Expenditure

	ERA Draft Decision	Our Response	Our Comment
Salaries (base year)	Modify	Modify	We propose to reinstate all the salary expenses which were rejected from the base year by the ERA $11.2 million and include an additional $2 million because of additional salary and wage pressures (+ $13.2 million) with comprehensive supporting evidence, detailed in our Attachment 8.7 on Salary Expenses, containing reasons for the higher costs. Attachment 8.7 demonstrates the prudency of our market-driven update to our labour cost rates with benchmarking results against WA market rates. We also present evidence to refute the notions that 2019 to 2023 is a reasonable benchmark period for labour cost efficiency given the significantly more difficult market conditions that are in play, and that the DBGNP has been operating in a 'steady state'. Salary trend analysis, labour market review, FTE growth assessment and discussion around the 'ageing asset syndrome' (which has been increasing labour costs) accompany the benchmarking of DBP's labour cost rates to support our revised proposal. Our proposal on salaries should be considered in conjunction with our proposal to

	ERA Draft Decision	Our Response	Our Comment
			include a portion of the impact of the labour cost rate in the calculation of the E Factor which reduces our revenue in AA6 directly by $21.6 million to help offset the price impact on customers from the change in capitalization policy.
Consulting (base year)	Accept	Modify	We accept the ERA"s decision in principle for the five-year average but have updated the forecast with the full year of actuals for 2024, which increases it from $3.9 million to $4.2 million
Insurance (base year)	Modify	Accept	We have updated the 2026 estimate as part of our revision to the step change for insurance expenses and so accept this part of the decision on base year insurance expenses
IT (base year)	Modify	Accept	We accept this as continued savings but request that these are acknowledged as the savings that are being sought in response to the step change proposals in IT as previously accepted (in AA5) recurrent savings for our IT investments
Government charges (base year)	Modify	Modify	We accept part of the ERA's Draft Decision that the base year adjustment requested was too high and have decided to absorb the higher telecommunication costs attached to the datacentre. However, we maintain the need for part of the adjustment to address higher recurrent costs for rent and power post 2024, which have been market-driven. On review of the 2025 to date actual expenses for Government Charges and further analysis of the cost increases (in December 2024 dollar terms), we are proposing a base year adjustment of $0.4 million in addition to the 2024 expenses outcome, which would bring Government Charges to $10.9 million in 2026
Other expenses in base year	Modify	Modify	We have updated our base year forecasts for many categories with 12 months of actual expenses (where no other adjustment is required), noting that the ERA's consultant EMCa employed a selective approach to the base-step-trend approach to forecasting, on many occasions recommending the lower of the base year placeholder forecast (based on nine-months of actual expenses) or the 12-months outcome (provide after the Final Plan), which ignores how the efficiency carryover mechanism already penalises any overspend in 2024 into the AA6 period.
Trend (real labour cost escalation)	Accept	Accept	We accept the decision in principle and note that recent WA Treasury forecasts released in June 2025 do not change our estimate of 0.67% per annum for the real labour cost escalator
Step change – insurance	Modify	Modify	We accept the ERA's use of the insurer's premium forecast but this report missed certain products and fees which we incur as part of our regular insurance expenses. We provided those items separately to the ERA's consultant, EMCa in its assessment of insurance expenses. We have included these missing items again with further insurer's advice to support these estimates as market-based.
Step change – IT sustaining infrastructure	Reject	Reject	We reject the ERA's Draft Decision and maintain our original position that we require a $1.8 million opex step change for IT sustaining infrastructure. While in principle

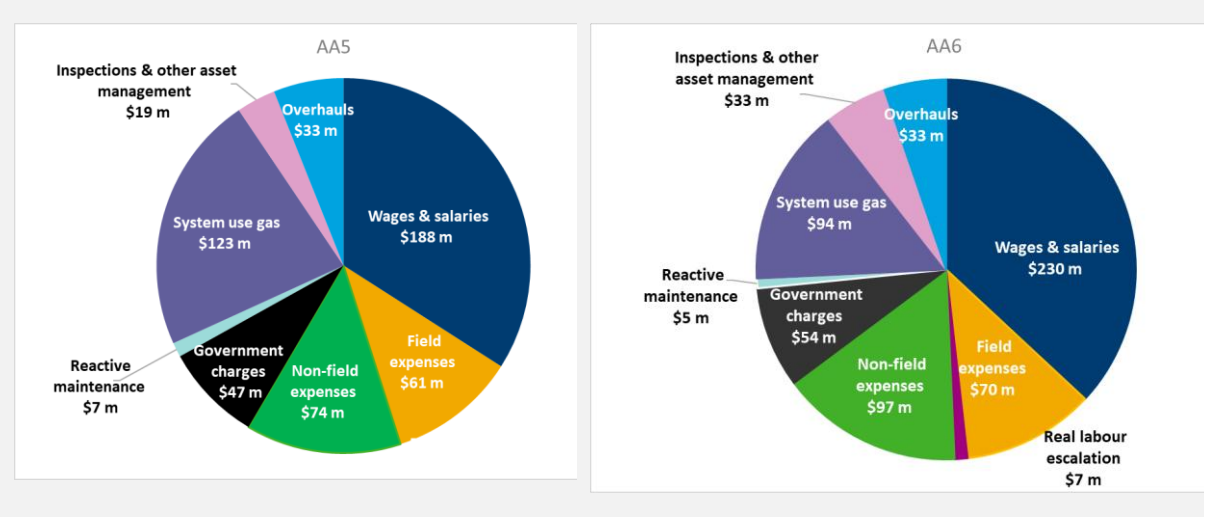
	ERA Draft Decision	Our Response	Our Comment
			we accept the ERA and EMCa's positions the "AGIG OneIT" initiative will provide efficiencies and savings from the ceasing of outsourced services should be netted off, we have provided further information to demonstrate how these have been taken into account in our proposed opex step change. Actual costs are higher than the step-change submission reflecting our commitment to achieve efficiencies but noting that we are unlikely to fully achieve this.
Step change – IT sustaining applications	Modify	Modify	We reject the ERA's assumption that our historical investments in IT applications will allow us to realise savings of $1.5 million per year, resulting in a net opex step change of just $0.8 million. To put this assumption in context, in Jan – Apr 2025 we have found an estimated ~$0.2 million of bankable savings/efficiencies from the OneERP incremental functionality program. Given S/4 HANA is our core business application, it is unreasonable to assume we can uplift benefits to the level assumed by the ERA's consultant, EMCa. We propose a modified opex step change of $5.3 million, net of savings of $0.6 million per year. This more realistically reflects the efficiencies that can be achieved over the AA6 period, noting this is dependent on approval of the application enhancements and upgrade programs. Actual costs are higher than the step-change submission reflecting our commitment to achieve efficiencies but noting that we are unlikely to fully achieve this.
Step change – IT cybersecurity	Accept	Accept	We accept the decision to allow the proposed cybersecurity step change in full.
System Use Gas (SUG)	Modify	Accept	We accept the decision which approves our SUG modelling for fuel gas quantity needs for given full haul throughput but is modified for the fuel gas contract outcome regarding price over AA6 (which was finalised after we submitted our Final Plan), and the ERA's revised demand forecasts (which flows through to adjusted throughput assumptions in the model).
Gas engine alternator (GEA) and turbine overhauls	Modify	Modify	We propose that the allowance for premature turbine failures as we proposed in our Final Plan ($6.5 million) and which was reduced by the ERA in its Draft Decision (by $3.25 million) be reinstated in full given likely turbine stresses in AA6, and that experience to date suggests that our proposal is the most likely outcome for turbine failure.
Inspections and other asset management	Modify	Modify	We propose that the ERA's reduction to our proposed expenditure meter station inspections ($2.7 million) be reinstated to include the full program of meter inspections as required by Australian standards, consistent with our Final Plan. There should be no adjustment required for the distinction between 'Existing Stations' and other stations because we must inspect stations regardless of O&M obligations at the site.

Note: In this 'traffic light' table, green shading represents acceptance, orange represents a modification and red shading represents rejection.

Our revised forecasts for opex in AA6 by category are shown below in Figure 1.1, together with our updated AA5 forecasts, which have been revised for 2024 actuals and updated 2025 forecasts. Our revised opex forecast for AA6 is $67 million or 12% higher than our estimated AA5 opex performance, but a lower differential between AA periods than was anticipated in our Final Plan ($108 million and 20%).

A large share of the change is for system use gas expenditure with actual contract price outcomes and updated demand forecasts reducing our estimate for AA6 by $20 million, as approved by the ERA. We have also revised our overall IT expenditure needs down by $0.6 million to demonstrate larger ongoing savings through our IT investments. Other changes generally reflect updated financial information available since we submitted the Final Plan and refinement of estimates in some cases (e.g. to account for inflation impacts).

Figure 1.1: DBNGP forecast opex - AA5 and AA6 by category, ($million, December 2024)



When considered together with our revised E Factor negative carryover estimate applying to opex as a separate building block of $52.3 million, we are only proposing a "net" increase in AA6 of $18 million or 3% on AA5 opex performance. In a higher cost environment, this demonstrates that our forecasts are prudent and efficient in accordance with NGR 91(1) especially since our controllable opex performance in AA5 has so far outperformed the benchmark.[1]

The following sections outline the reasons for our responses to the ERA's Draft Decision in this Revised Final Plan.

1.4 Base year expenses

1.4.1 Salaries expenses

In our Final Plan, we proposed base year salary expenses for 2026 of $43.0 million. This incorporated a forecast for 2024 of $40.0 million and a base year adjustment of $3.0 million.

[1] As the calculations of the revised E Factor carryover show (See Attachment 12.2 – Response to Incentives Draft Decision) our actual 'controllable' opex was $300 million to 2024 in AA5 while the benchmark was $313 million (both in $December 2024), suggesting overall outperformance by $14 million or 4% over this period.

We provided evidence of the salary rate increases (for field and control room staff)[2] and explained that the superannuation guarantee contribution increase was also factored into the need for the base year adjustment, as well as the staffing needs from 2026, with further vacancy filling occurring to address essential business requirements.

This amount also incorporated a change in capitalisation policy which lowered our internal labour charge out rates but therefore but increased salary expenses for the DBNGP directly by $7.7 million in 2024 compared with 2023. The change in rates was market-based to ensure that our cost rates were more consistent with the market because salaries had increased relative to oncosts (due to tight labour market conditions) and if our cost rates were too high, it would make the business internal labour less competitive, increase capital project costs and compromise internal efficiency in utilising labour resources.[3]

The ERA did not allow our proposed labour cost rate adjustment. Its consultant, EMCa found that

> *We consider that this is a misrepresentation of regulatory requirements: it is not the role of the regulatory process for a regulated entity to effectively underwrite a shortfall in charge outs to other areas of the business, nor to absorb excess resource costs due to a reduction in capex requirements. The appropriate representation of regulated costs is that they should be prudent and efficient in meeting the specific needs of the regulated business entity. And, noting that the NGR defines this separately for capex and for opex, we consider that it is also the case that a reduced capex requirement does not justify loading inefficient resource costs into opex requirements (para 568, page 116 EMCa report)*
>
> *We note that AGIG is no longer receiving the equivalent amount of revenue from capex projects and other areas of the business where the cost rates are charged, and it is reasonable to recover the full labour costs incurred as part of regulatory opex.' (para 567, page 116 EMCa report)*[4]

The Draft Decision approved only $31.1 million for salary expenses in 2026, which disallowed a total of $11.2 million as proposed for 2026. Not only had the Draft Decision removed the impact of the labour charge out rate described above, but also a disallowed an additional $3.5 million from the base year. The ERA's consultant, EMCa had relied on a 2019 to 2023 average for wages and salaries expenses (combining both salaries and salary – contractor expenses) as a benchmark of efficiency to recommend reducing the allowance to this amount. The ERA also stated that DBP was operating in a 'steady state' and so did not warrant any further increase in salary costs.[5]

First, the assessment appears to have ignored the relationship between internal salary and external salary (contractor) expenses. Lower expenses in contractor expenses in 2024 (by $0.5 million) has partly contributed to higher internal salary expenses because more work is being done in house (such as maintenance work. The 2019 to 2023 average for salary expenses (without contractor expenses) is $31.8 million which is $0.7 million even lower than allowed by the ERA for 2026 despite the lower contractor expenses being approved based on the same average.

[2] Attachment 8.5 Transmission Operations Field Remuneration Review 2024_CONFIDENTIAL
[3] Attachment 8.7 Additional Information on Forecast Salary Expenses
[4] EMCa Report paragraphs 568-569
[5] ERA Draft Decision Attachment 5, p 1

However, the labour market conditions tightened significantly through AA5 and use of the average of the 2019 to 2023 period is not a reasonable estimate by which to assess efficiency in the current market. As Attachment 8.7 explains, salary expenses in 2019/2020 were particularly low because of COVID pandemic constrained operating conditions in which continued into 2021/ 2022. If the later years of AA5 are also considered where our responses to tight market conditions are evident, the average salary expense levels are higher. Excluding the impact of the change to labour charge out rates, the average for 2020 to 2024 is $33.5 million.

Further in its Draft Decision on salary expenses, the ERA has over penalised DBP in its calculation of the E Factor negative carryover by around $14 million. It has not adjusted for the additional deduction (over and above the impact of the labour cost rate) in 2024 from its allowance for 2026. This issue which also applies to their expense items has been discussed in Attachment 12.2 in our Response to the Draft Decision on Incentives.

In general, we do not accept the ERA's Draft Decision concerning our salary expense forecasts and propose that a revised amount of $45 million be instated in our base year opex ($43.0 million proposed in our Final Plan + $2.0 million reflecting annualised increases flowing predominately from head count increases in our field operations and asset management functions). In addition to the supporting information already provided with our Final Plan on salary level increases which have been wholly market-driven, we have provided additional supporting evidence in this revised Final Plan which is brought together in confidential Attachment 8.7. In this attachment, we provide evidence to demonstrate that:

- The labour cost rates resulting from DBP's capitalisation policy have been reasonably calculated are market-aligned (still being marginally higher than the market based on labour cost rate benchmarking), showing that the review and adjustment was timely and necessary.
- The review and revision of labour capitalisation rates as a methodology was reasonable from an accounting perspective, despite the impact on regulatory opex and the partial offset to regulatory capex was not acknowledged by the ERA in the amount it has allowed (despite information being provided which estimated the amount in 2024 of $2.3 million).
- The 2019 to 2023 wages and salaries average is not a reasonable benchmark of efficiency – it incorporates at least 3 years of material impacts and ignores the labour market conditions which have significantly shifted in 2024 compared with this period. Our year to date 2025 salary expenses (to June) are already suggesting that the annual result could be as high as $50.0 million which is more than $5 million higher than our revised estimate for 2026. This appears to be due to the impact of the salary increases and additional resourcing needs being even higher than anticipated in our Final Plan, but we are keen to achieve savings for our customers and will attempt to absorb these costs where possible.
- The tight labour market and pressure on salary levels and conditions in the business is continuing and could increase salary expenses by more than we have forecast in our Revised Plan over AA6. It has clearly not been a 'steady state' labour market environment.
- Neither has the business been operating in a 'steady state' without additional pressure on labour resources; on the contrary, there has been an increase in the number of field resources whose responsibility it is to maintain the DBNGP, whose activities were

adversely impacted through Covid years and greater forecast demand for maintenance as the asset begins to age. Of the headcount increase in the period 2021-2025, 60% of this has occurred in the field operations and asset management business units alone, which additional increases in IT in response to higher complexity in the operating model led by market conditions (i.e. cyber risk response, cloud hosting etc).

With the 2024 actual of $40.3 million, we propose a base year adjustment of $4.8 million for recurrent costs from 2026. This increases the base year forecast from that included our Final Plan of $43.0 million to $45.0 million.

However, to reduce the impact on tariffs, in our revised Final Plan we have also proposed that the net impact of the labour cost rate be included from the calculation of the E Factor carryover.

This significantly reduces the impact of the salary increases by $21.6 million or an average of $4.3 million per annum in AA6. Under this approach, we would absorb most of the impact of the labour charge out rate change and there would not be any distortion from an asymmetrical approach being applied to our labour cost performance through the E Factor. Therefore, the DBNGP won't be compromised in delivering on safety and reliability of services as a result of lower than necessary labour resources.

1.4.2 Consulting expenses

The ERA approved our proposed approach in our Final Plan to continue to apply the five-year average to forecast consulting expenses, as has been the approach in previous AA periods to address annual volatility of consulting expenses. It allowed $3.9 million for the base year as we had proposed (based on the annual average over 2020 to 2024), amounting to $19.5 million over five years in AA6.[6]

Our 2024 actual estimate for consulting expenses has since been revised to $4.4 million from $3.0 million (based on 12 months, rather than 9 months, of actual estimates with the variation due to the timing of receipts through the year). With the updated 2024 estimate, the annual average over 2020 to 2024 is $4.2 million, which is around $0.3 million higher than approved in the ERA's Draft Decision.

Based on the updated data to application of the five-year average for the base year, we propose that the forecast for consulting expenses over AA6 be increased by $1.3 million to $20.8 million.

1.4.3 Insurance expenses

We had proposed $4.4 million for base year insurance expenses in our Final Plan, which incorporated a base year adjustment of $0.7 million to the expenses forecast for 2024 based on nine-months of actual data ($3.7 million).[7]

We had proposed the base year adjustment because 2024 is not an accurate representation of our current recurrent insurance expenses. Although our updated 2024 estimate for insurance is $3.4 million (based on 12 months of actual data), the two-year average over 2023

[6] ERA Draft Decision Attachment 5, [40] to [42] and Table 5.4
[7] DBP Final Plan 1 January 2026 to 31 December 2030, p 75.

and 2024 is $4.1 million. On further review, the annual difference is due to an accrual being charged in 2023 (from 2024) for insurance expenses (around $1 million) in anticipation of an insurance claim which did not eventuate.

The ERA approved $3.7 million for the base year only[8] but approved a portion of our proposed step change for insurance expenses from higher premiums (including in 2026), with a focus on the market-based assessment we provided.[9]

We have accepted the ERA's Draft Decision regarding our base year for insurance expenses to help streamline our response regarding insurance expenses in AA6, which is focused on the value of the step change and inclusion of missed products and fees. We have proposed a revised step change in 2026 (calculated from the approved $3.7 million base year) to meet our insurance needs, which is higher than the 2024 actual amount by $0.5 million. See section 1.5.1 below for further details.

1.4.4 IT expenses

In our Final Plan we proposed a base year adjustment to our IT expenses of $2.1 million to bring it up to $7.6 million to address our current actual IT costs. The ERA did not accept this base year adjustment because we had provided a breakdown of the reported IT expenses in 2024 and there was not enough information to support a further increase for 2026.

In AA5, the ERA accepted DBP's proposal to absorb $8.6 million in increased IT operating expenditure resulting from the increased IT investment which we proposed, which equated to a 1.0 per cent per year productivity adjustment or an average of $1.7 million per annum.[10]

We have reconsidered our base year needs for IT, together with the step changes we are proposing for Sustaining Applications and Sustaining Infrastructure in IT. We have decided to accept the decision by the ERA to accept a base year estimate in line with our reported actual expenses of $5.5 million to help demonstrate the realisation of savings for our IT investments.

Our decision to not seek the additional $2.1 million per annum exceeds the amount we are seeking for Sustaining Applications and Sustaining Infrastructure in IT (+$1.4 million per annum) which were originally disallowed in the Draft Decision (see sections 1.5.2 and 1.5.3 below for further discussion on these IT step changes).

1.4.5 Government Charges expenses

In our Final Plan, we proposed $11.6 million for the 'Government Charges' category in our operating expenditure base year, which included a forecast for the subcategory 'Utilities rates and taxes' of $5.7 million from 2026 and $5.9 million for the other subcategory 'Permits, licences, fees and taxes'. This incorporated a base year adjustment to our 2024 forecast for the 'Utilities rates and taxes' subcategory for anticipated increases in recurrent costs by $1.0 million, consistent with budget forecasts for the 2025 year (which were still

[8] ERA Draft Decision Attachment 5, [53]
[9] ERA Draft Decision Attachment 5, [67] to [70] and Table 5.10
[10] See: Final decision on proposed revisions to the Dampier to Bunbury Natural Gas Pipeline access arrangement 2021 to 2025, [497]

higher at $11.9 million). We estimated a breakdown of the increase in recurrent costs and provided this in a response to an information request from the ERA's consultant.[11]

The ERA acknowledged that the base year adjustments were for higher utility charges, higher telecommunication charges (such as for the new datacentre) and higher rental expenses for certain facilities, which will occur from 2025.[12]

However, it disallowed any of the proposed additional increase on the 2024 forecast for the 'utilities rates and taxes' subcategory, with advice from its consultant, EMCa as follows:

> *EMCa analysed the expenditures proposed and compared them to the five-year average (2019 to 2023) and the 2024 actual. This shows that DBP's proposed amount is $2.9 million higher than the five-year average and $1.1 million higher than the 2024 full year actual respectively.*
>
> *While there have been increases in such costs, DBP proposes more than a doubling of costs for Permits, Licence Fees, Rates and Taxes. DBP's proposed adjustment of $1.0 million for Utilities Rates and Taxes represents a 21 per cent increase. DBP's explanation for this is insufficient to support an increase that would add $5 million to its allowance over AA6.*[13]

Our proposal in our Final Plan would have resulted in a 10% increase to Government Charges in expenses in 2026, compared with 2024. The 12-months of actual expenses in 2024 (rather than nine-months) has resulted in similar forecasts for Government Charges without any base year adjustment: $10.5 million. This is the same amount that the ERA approved in the Draft Decision.

The six months of Government Charges expenses to June 2025 indicates Government Charges of $11.2 million in 2025. We have reviewed the need for a base year adjustment in light of this result which is $0.7 million lower than the Budget forecast of $11.9 million at the time of the Final Plan. We have also reviewed additional information to support our likely costs in AA6.

We consider a base year adjustment is still required but have revised the extent of it to $0.2 million because:

- We will absorb the need for any increase in telecommunication costs attached to the new datacentre to achieve savings.
- Our estimates in our Final Plan previously incorporated some inflation over AA6.
- Expenditure increases indicative of market conditions due to higher power costs[14] are consistent with NGR 91 (1), and we have provided additional information to support these higher costs (Confidential Attachment 8.8).

[11] ref
[12] ERA Draft Decision Attachment 5, [xx]
[13] ERA Draft Decision Attachment 5, [61]
[14] The CPI All Groups Australia increased by 21% from December 2020 to June 2025 while electricity prices in Perth increased by 232% over the same period. (See: Consumer Price Index, Australia, June Quarter 2025 | Australian Bureau of Statistics, Table 1 and 2, Series A2325846C and Table 9, Series A2331856W and Series A2328121X.

The electricity costs for the DBNGP operations are forecast to increase by an average of $0.2 million per annum over AA6 compared with 2024 (December 2024 dollars). This forecast is informed by advice from an electricity broker and supplemented by our adjustments for further changes to new provider arrangements and increased compressor station (CS10 and CS8) power usage forecasts over AA6 (Confidential Attachment 8.8).

Our revised Final Plan base year forecast for Government Charges in 2026 is $10.7 million, which is $0.2 million higher than the Draft Decision.

1.4.6 Other base year expenses

Our Final Plan included a base year forecast for 2024 based on nine months of actual expenses (January to September 2024) and three months of forecasts (October to December 2024). Since then, DBP has reported 12 months of actual expenses for the DBNGP and we have updated our base year forecasts for 2026 with these estimates across the remaining subcategories of expenses. Table 1.4 below summarises the differences.

Table 1.4: Revised base year forecasts for selected items without further adjustment ($ millions, December 2024)

Expense item	ERA-approved amount based on nine-months of actual expenses for 2024	Revised forecast for 2026 based on 12 months of actual expenses for 2024	Difference
Salaries - Contractors	1.0	1.0	-
Employee Expenses	1.0	1.3	+0.3
Advertising	0.1	0.2	+0.1
Entertainment	0.3	0.3	-
IT	5.5	5.5	-
Motor Vehicle	1.6	1.9	+0.3
Office & Admin	0.8	0.9	+0.1
OHS	0.3	0.3	-
Repairs & Maintenance	7.8	8.1	+0.3
Training & Development	1.6	1.5	-0.1
Travel & Accommodation	2.4	2.5	+0.1
Reactive Opex	1.0	1.0	-
Permits, Licence Fees, Rates & Taxes	5.8	5.8	-
Total			**+1.1**

1.5 Step changes

1.5.1 Insurance expenses

In our Final Plan we proposed a step change of $4.9 million in AA6 for higher insurance premia. This step change was proposed together with our base year adjustment for insurance expenses ($0.7 million), as was discussed in section 1.4.3. We had identified how higher premium costs are due to the combined effect of past insurance claims by DBP, asset revaluations and increased risks in the market more generally. We also have a new cybersecurity insurance policy in place.[15]

The ERA approved a total step change of $3.7 million (together with a base year amount in 2026 of $3.7 million).[16]

The ERA noted that its consultant, EMCa found that the market-based assessment of premia provided by our insurer was reasonable and so approved a step change consistent with the aggregate of the forecast premiums over the AA6 period which were included in this report.[17]

However, there were products and fees which form part of our regular insurance expenses that were omitted from this report. These items were provided to EMCa in our response to an information request during the assessment process about our base year insurance expenses.[18]

Our insurer has subsequently provided further market-based advice (Confidential Attachment 8.4A) about the product premiums and fees that we will incur in AA6 (consistent with the products and fee items we incur now) that were not originally included in the report we submitted with our Final Plan (Confidential Attachment 8.4). These sum to a total of $2.3 million over AA6, or an average of $0.5 million per annum.

The missed products and fees should also explain the difference from the sum of products and fees in the insurer's report from our average insurance expenses in 2023 and 2024 of $4.1 million (as was discussed in section 1.4.3 above).

The additional information for our insurance expenses supports a revised step change of $5.9 million, as shown below in Table 1.5, based on a market-based assessment. This assumes the base year of $3.7 million for insurance, with the additional $2.3 million now added to the ERA's approved step change of $3.7 million.

Table 1.5: Summary of revised step changes for insurance expenses in AA6 (millions, $ December 2024)

Cost	2026	2027	2028	2029	2030	Total AA6
Incremental step change for insurance	0.48	0.10	0.49	0.54	0.56	
Total step change for insurance	**0.48**	**0.58**	**1.07**	**1.61**	**2.17**	**5.92**

[15] ERA Draft Decision Attachment 5, [53] and [70]
[16] ERA Draft Decision Attachment 5, [53] and [70]
[17] ERA Draft Decision Attachment 5, [49] to [52]
[18] EMCa18 Opex – Response to questions – CONFIDENTIAL, question 43.

1.5.2 Sustaining Applications (IT)

We proposed $8.3 million as a step change for IT sustaining applications in AA6. As detailed in the Business Case and the Investment Plan, the increases in IT operating expenditure are primarily due to increased licence and subscriptions costs such as for Platform as a Service (PaaS) and Software as a Service (SaaS) applications, where capital expenditure offsets are evident under the new cloud-based environment. As the ERA acknowledged, we offset new costs by the costs for those licences and subscriptions that we will no longer incur.[19]

The ERA's consultant, EMCa found that:

> *DBP had made major investments in business systems providing corporate, commercial and technical support including its 'OneERP' development, a new billing system, new HR systems and Maximo business process redesign. In the business cases provided, DBP has not quantified the benefits from these but as a minimum, the benefits should offset the higher IT operating costs.*[20]

EMCa considered that while some increase in operating costs may be required, it was reasonable to offset the 2026 proposed operating cost step change of $1.5 million (totalling $7.5 million for AA6) given the significant spend in IT expenditure in AA5.[21] It allowed $0.8 million in AA6 in total.

We reject the ERA's Draft Decision on our opex step change and propose modifications to reflect a more realistic value of IT efficiencies we might be able to achieve. With our offsetting efficiency adjustment of $0.6 million p.a. (totalling $3.0 million for AA6), we propose a net opex step change of $5.3 million to be prudent and reasonable.

We acknowledge the need for savings in our IT investments where possible. However, none of the technology investments made in AA5 were made on the basis of operational efficiency. Rather, they were driven by system end-of-life, and associated risks, for OneERP and TBS, building our capability to manage the full employee lifecycle through an integrated Human Capital Management solution – for which DBP has only contributed to the costs of the learning module deployed in 2023 – and to fix fundamental limitations in our asset management structures (Maximo business process redesign).

Using estimated benefits for deployed OneERP incremental functionality between January and April 2025, we have identified seven of 40 items which deliver a bankable opex saving/efficiency of $203,500 across AGIG. Annualised, this totals $610,500 across AGIG, and $359,500 which would be attributed to DBP.

In technology, processes evolve quickly, therefore we consider savings of this nature are only recurring for two years. Likewise, as the new system and processes mature, our ability to continue to find improvements that drive operational efficiency reduce. Therefore, contingent on the approval of $3.0 million capex over AA6 to deliver SAP S/4 incremental

[19] ERA Draft Decision Attachment 5, [72] to [73]
[20] ERA Draft Decision Attachment 5, [74]
[21] Ibid

functionality, we consider a realistic value for ongoing opex efficiencies associated with the OneERP investment is $0.6 million per annum.

We maintain that we need a large share of the step change for Sustaining Applications as we proposed, and that it constitutes prudent and efficient expenditure under NGR 91 (1). We have revised our proposed step change to $5.3 million from the $8.0 million proposed in the Final Plan in order to achieve more savings than we first proposed, consistent with the ERA's Draft Decision.

Table 1.6 below provides a summary of all proposed IT step changes in AA6 in our Revised Plan, including for Sustaining Applications.

1.5.3 Sustaining Infrastructure (IT)

We proposed a step change of $1.8 million for IT sustaining infrastructure for the new datacentre in WA.[22]

EMCa, the ERA's technical consultant, reviewed the step change and found that:

> *AGIG has embarked on a major program to rationalise its IT infrastructure, including a West Coast Data Centre that has a dual purpose of providing primary IT infrastructure to DBP and backup infrastructure to AGIG's east coast operations. DBP claims that this "AGIG OneIT" initiative will provide efficiencies, however, the proposed step increase seems inconsistent with the efficiency claim.*[23]

Based on this advice, the ERA considered that the proposed step change is not reasonable because we did not demonstrate the need for costs that are greater than those already included in the base year for IT.[24]

While in principle we accept the ERA and EMCa's positions the "AGIG OneIT" initiative will provide efficiencies and savings from the ceasing of outsourced services should be netted off, we have provided further information in Attachment 9.12 to demonstrate how these have already been taken into account in our proposed opex step change. When viewed together with the existing savings already been achieved in the base year from 2026 for IT ($2.1 million), the additional cost for sustaining infrastructure is prudent and efficient and we seek a modification to the ERA's Draft Decision to reinstate the proposed amount in our Final Plan.

Table 1.6 below provides our proposed step change for Sustaining Infrastructure in AA6.

1.5.4 Cybersecurity (IT)

We proposed $2.3 million as a step change to our IT expense forecasts in AA6 for cybersecurity initiatives to address gaps in IT and OT security. This step change was approved by the ERA as prudent and reasonable.[25]

[22] ERA Draft Decision Attachment 5, [76]
[23] ERA Draft Decision Attachment 5, [77]
[24] ERA Draft Decision Attachment 5, [79]
[25] ERA Draft Decision Attachment 5, [80] to [82]

We accept the decision and have no further changes regarding our cybersecurity needs. The step change across the forecast period is shown in Table 1.6.

Table 1.6: Summary of proposed step changes for IT opex in AA6 (millions, $ December 2024)

Cost	2026	2027	2028	2029	2030	Total AA6
IT Sustaining Infrastructure	0.1	0.2	0.4	0.5	0.6	1.8
IT Sustaining Applications	0.9	1.3	1.0	1.0	1.0	5.3
IT Security	0.1	0.5	0.5	0.5	0.5	2.3
Total	**1.1**	**2.0**	**1.9**	**2.0**	**2.1**	**9.4**

1.6 Bottom up opex forecasts

1.6.1 System Use Gas

We forecast $116.6 million for our System Use Gas (SUG) requirements in AA6 in our Final Plan. This was not inconsistent with our projected SUG costs in AA5 of $121.7 million.[26]

SUG costs in the tariff model are a function of forecast quantity (over the relevant range of full haul) and the forecast gas price. As noted by the ERA, the forecast quantity of SUG is linked directly to the projected full haul throughput, and is driven by expected gas quality, the quantity required as compressor fuel to transport forecast gas throughput and the quantity required for all other operational activities including in GEAs and heaters and what is vented during normal operation and maintenance activities. We revised our assumptions related to CS10 and transient behaviour in our SUG model and the ERA supported these revisions as reasonable.[27]

We had also factored in an assumed contract price outcome for our fuel gas expenditure which incorporated escalation assumptions over the period. Since then, we have secured a contract price (around $10/GJ) which is different to the price outcome we had assumed over AA6. The ERA has applied this price outcome in its Draft Decision together with its revised demand forecast for full haul throughput.[28]

While we accept the ERA's application of the SUG contract price and revised assumptions related to CS10 we have amended the demand forecasts in the Draft Decision resulting in a

[26] ERA Draft Decision Attachment 5, [91]
[27] ERA Draft Decision Attachment 5, [91] to [93] and [98] to [99]
[28] ERA Draft Decision Attachment 5, [96] to [97] and [100]

lower full haul throughput forecast. In light of this reduction in full haul throughput proposed we have reduced our proposed SUG expenditure to $94.5 million in AA6.[29]

1.6.2 GEA and Turbine Overhauls

We are proposing the same program of expenditure of $32.8 million for GEA and turbine overhauls, as we presented in our Final Plan. These costs are a function of unit run hours and estimated costs per unit.

In the Draft Decision, the ERA approved $29.5 million for our GEA and turbine overhauls expenditure.[30] It considered that our proposed exchange and overhauls program for AA6, including our planned overhauls and proposal to remove varnish build-up from turbine components, is prudent and reasonable.[31] It noted how the costs for turbine overhauls are largely driven by Original Equipment Manufacturers' (OEM) costs in accordance with warranty terms and conditions, and that the costs proposed are in line with OEM requirements, as well as costs incurred in AA5 on a per unit basis.[32]

However, the ERA did not approve our proposed allowance in full for two premature failures of turbines over the period ($6.5 million). It approved $3.25 million, $3.25 million less than we proposed, allowing for one premature turbine failure only.[33]

The ERA's consultant, EMCa advised that there are several factors in the AA6 period that could result in lower premature failures, including:

- DBP's comprehensive overhaul program.
- Lower forecast throughput.
- Forecast increasing Perth Basin production.[34]

We disagree with these assumptions under which the ERA has allowed for only one turbine premature failure over AA6.

Premature failures recorded on the DBNGP are in most cases related to OEM overhaul standards. In AA6, there is likely to be more stress on the units with frequent starts and peaking load top ups due to low flows (throughput) and not less stress. The advent of Midwest (Perth Basin) production and its unreliability in the early stages will see more "stop starts" of the compressors midway along the pipeline to maintain T1 full haul certainty. When there is no flow, there must be immediate change to full haul flow from the Pilbara to replace the swapped gas.

History regarding the overhauls program for the DBNGP has demonstrated that DBP is usually accurate in forecasts of overall overhaul needs. In AA5, we had proposed that there be an allowance for eight overhauls (including failures)[35] and this is how many have eventuated to date.[36] The approved allowance was $4.8 million (in December 2024 dollars) less than our

[29] ERA Draft Decision Attachment 5, [100]
[30] ERA Draft Decision Attachment 5, Table 5.12
[31] ERA Draft Decision Attachment 5, [107], [111] and [115]
[32] ERA Draft Decision Attachment 5, [105] to [106]
[33] ERA Draft Decision Attachment 5, [108] and [110]
[34] ERA Draft Decision Attachment 5, [109]
[35] See: DBP-revised-Final-Plan-Attachment-7.2A-Addendum-to-Opex-Business-Cases-Public-.pdf, p 1
[36] Final Plan Attachment 8.2 - Opex Business Cases, Table 1.3

needs for AA5[37] as the ERA considered that there should be more savings[38] even though our program of overhauls has already been optimised. In general, we cannot compromise the safety and reliability of the DBNGP by not attending to overhauls when required.

DBP is not rolling forward the current premature failure rate of three over five years, rather we have considered the most likely outcome for failures.

The number of turbine overhauls required from AA3 to AA5 (including planned overhauls and failures) has averaged 7.3 per period[39] and this further supports our forecast for seven overhauls (five planned and two failures), rather than six in AA6. In addition, the number of premature failures each AA period has averaged two, and over the last 10 years, there is generally one failure every two years, or so.

For these reasons we consider that an allowance for two failures in AA6 is prudent and efficient. With a modification of $3.25 million on the Draft Decision allowance, this would bring our expenditure back to $32.8 million in total for our GEA and turbine overhaul program.

1.6.3 Inspections and other Asset Management

We are proposing the same amount of expenditure of $33.0 million for Inspections and Other Asset Management category as we proposed in our Final Plan. This is for asset inspections of pipeline and mainline valves, compressor stations and meter stations, as well as decommissioning activities, health and safety initiatives and other asset management needs.

In the Draft Decision, the ERA approved $30.1 million expenditure for these programs in AA6, finding most of the proposed inspections and other activities to be reasonable, as we proposed.[40] The only aspect of the program which was not approved in full related to meter station inspections.

For meter station inspections, the ERA revised down our forecast of $4.8 million by $2.9 million as it only allowed a pro rata share of inspections that we had planned in the forecast. It approved expenditure of $1.9 million for these inspections only.[41]

The ERA considered that the expanded station inspection regime that we proposed with additional mechanical and rotational routine pressure vessel and relief valve inspections is prudent to identify and address previously undetected risks including related to asset corrosion.[42]

However, based on the advice of its consultant, EMCa it has removed an indicative share of inspections of meter stations from the proposed program by applying a pro rata share of sites

[37] DBNGP (WA) Regulatory Information Notice AA5 (2021-2025) - Attachment 3, Appendix A - Regulatory Templates, 5-Opex tab
[38] See: erawa.com.au/cproot/21855/2/PUBLIC---DBNGP---DBP---AA5-Final-Decision.PDF, [538] and [559]
[39] Final Plan Attachment 8.2 - Opex Business Cases, Table 1.3 and DBP calculations
[40] ERA Draft Decision Attachment 5, [116] to [124]
[41] ERA Draft Decision Attachment 5, [125] to [127]
[42] ERA Draft Decision Attachment 5, [122] to [124]

on the DBNGP that are termed 'Existing Stations'[43] in shipper contracts. This applies to 26 of 67 sites or 39 percent of total meter stations.[44]

The ERA's position is essentially that inspections at the other remaining station sites (not 'existing stations') would be directly the responsibility of a specific shipper and so should not be funded through the reference tariff. It stated:

> *Regarding inspections at meter stations, there are 26 existing stations out of a total of 67 inlet and outlet stations on the DBNGP for which the operations and maintenance costs cannot be recovered separately from shippers under clauses 6.11 and 6.12 of the Reference Service Terms and Conditions T1, P1 and B1.*
>
> *As DBP did not provide a list of sites at which works are proposed during AA6 in response to an information request, EMCa considers that a reasonable allowance is for inspections at meter stations to be reduced pro-rata to the proportion of existing stations, that is, for the allowance to be reduced to 39 per cent of the proposed allowance or $1.9 million (from $4.8 million). This would reflect a pro-rata portion of inspections expenditure for the existing stations which are not separately funded by shippers.*[45]

We contend the basis of the decision which draws a distinction between 'Existing Stations' and other stations because it is assumed that the individual shippers have responsibility to carry out inspections when they have capex-related operations and maintenance (O&M) obligations at the site. The O&M activities undertaken by individual shippers under clauses 6.11 and 6.12 of the Reference Services Terms and Conditions are already excluded from the DBNGP's reported repairs and maintenance expenses in regulatory opex.

However, inspections are distinct from maintenance activities; they are for safety-related reasons and it is DBP's responsibility to ensure that all meter stations on the DBNGP are subject to an inspection regime consistent with Australian standards. Inspecting all meter stations (and not just Existing Stations) is consistent with our approach in all AA periods since the pipeline has been subject to price regulation.

We note that the ERA has formed a similar view that it is an individual shipper's responsibility regarding our proposed capital expenditure of meter stations (refer Attachment 9.11 and 9.12 Response to the draft decision – Meter Stations). Our response to this decision is also relevant to our response here for operating expenditure.

Therefore, we propose that the $2.9 million that was not approved by the ERA for remaining proposed meter inspections be reinstated in our total expenditure ($33.0 million) for Inspections and Other Asset Management.

[43] 'Existing Station' means an inlet station or outlet station that was installed and commissioned on or before 1 January 1995; or which is the subject of a separate agreement, as listed in Schedule 6 of the Reference Services Terms and Conditions. EMCa made the distinction between Existing Stations and other stations because O&M costs cannot be recovered separately under the Reference Service Contract for existing station sites.
[44] EMCa Technical Review, [648] to [650].
[45] ERA Draft Decision Attachment 5, [125] to [126]

1.7 Summary

Our revised Final Plan opex forecast for AA6 is $622 million, which is $87.0 million or 16% more than the ERA's Draft Decision of $535.0 million but should be considered in tandem with our revised proposal to include the labour cost rate (where it is not offset by regulatory capex impacts) in the efficiency carryover calculation. This aspect of our plan reduces our revenue in AA6 by a further $21.6 million, expanding our overall negative carryover to $52.3 million. When considered together, we are only proposing a "net" increase in AA6 of $18 million or 3% on AA5 opex performance.

This is important for our customers who will benefit from the mechanism as it offsets the effects of the market-based labour cost rate update and the higher cost environment, significantly impacting the cost of our operations at the end of AA5.

Our revised Final Plan opex forecast is otherwise $30 million (or 5%) lower than our Final Plan forecast. We have reviewed the need for all items of expenditure carefully: we believe our approach to forecasting opex is prudent and efficient in seeking to achieve savings in IT, telecommunications and labour activities compared with our previous proposal, we have considered closely the impact on our customers.

A summary of our revised opex forecast is provided in Table 1.14 below.

Table 1.14: Revised Final Plan Opex Forecast ($,000s, December 2024)

Category	2026	2027	2028	2029	2030	Total AA6
Wages & Salaries	46,570	46,882	47,196	47,512	47,830	235,989
Field Expenses	14,040	14,040	14,040	14,040	14,040	70,200
Non-field Expenses	17,969	18,989	19,361	20,048	20,755	97,123
Government Charges	10,704	10,704	10,704	10,704	10,704	53,520
System Use Gas	18,074	18,715	20,261	18,244	19,166	94,460
Reactive Maintenance	1,040	1,040	1,040	1,040	1,040	5,200
GEA & Turbine Overhauls	4,856	8,806	4,506	6,860	7,756	32,784
Inspections & Other Asset Management	4,846	10,444	10,373	3,613	3,729	33,005
Total opex forecast	**118,099**	**129,620**	**127,481**	**122,060**	**125,020**	**622,281**