Revised Final Plan
Attachment 9.12

IT Sustaining Applications

August 2025

PUBLIC

Dampier Bunbury Pipeline

1 IT Sustaining Applications

1.1 The ERA's position

Based on advice from EMCa, the ERA reduced DBP's IT sustaining applications AA6 forecast capex by $11 million (52%). In summary, the ERA:

- Made a 70% reduction to our proposed Transmission Billing System (TBS) upgrades
- Made 20% reduction to our other proposed application upgrades
- Rejected all application enhancements proposed for AA6

The ERA has also heavily reduced DBP's proposed IT opex step change relating to the higher ongoing costs of operating applications during the AA6 period. The proposed $8.3 million opex increase across the period ($1.66 million per year on average) is driven by the shift to cloud platform and software services, which are becoming the standard way many applications are now provided, plus ongoing support costs.

EMCa considers the investments to date in business systems including S/4HANA, the TBS, Maximo and our new HR systems will result in enduring operational efficiencies that would almost completely offset this increase in application operating costs throughout the AA6 period. As such, EMCa estimates DBP will be able to realise $1.5 million of efficiencies per year throughout the period, the net result being an overall increase in IT applications opex of less than $800,000 over five years.

The ERA's Draft Decision on AA6 expenditure and its reasoning is summarised below.

Table 2.1: Summary of ERA's AA6 capex draft decision on IT sustaining apps

Issue	DBP Final Plan	ERA Draft Decision	ERA's reasoning
TBS upgrades	1.75	0.53	EMCa considers that DBP has not justified the need to allow $1.8 million over AA6 [f]or annual upgrades of the TBS, which is newly developed, exists in part to manage billing of customers under non-regulated contractual arrangements and for which, in its business case, DBP forecast no further capital expenditure requirement beyond the initial deployment. Absent justification that addresses these matters, EMCa considers that a reasonable allowance is for 30 per cent of what DBP has proposed.[1] DBP states its cost estimates are "based on advice from the vendor" and "historical averages of upgrades and enhancements made to the old CRS system." Yet in DBP's detailed business case, DBP estimated that maintaining the CRS would cost $1.2 million in capex over five years, but that for the TBS no post-implementation capex would be required.[2] DBP states that significant factors in its choice of system include that it is "easy to support and maintain (all included in subscription)" and that "changes to configuration can be made by AGIG staff with Excel skills or outsourced [to] other resellers/partners" and that "other skills required to make changes or enhancements [are] commonly available."[3]

[1] Paragraph 303, Draft decision on revisions to the access arrangement for the Dampier to Bunbury Natural Gas Pipeline (2026 to 2030) Attachment 4: Regulatory capital base, ERA, 7 July 2025.
[2] Paragraph 293, ibid.
[3] Ibid.

Issue	DBP Final Plan	ERA Draft Decision	ERA's reasoning
			To the extent that upgrades are required to meet the complexities of non-regulated contracts, these should not be charged to DBNGP.[4]
Other application upgrades	12.17	9.74	EMCa also considers that a reasonable alternative allowance for upgrades would be to provide 20 per cent less than DBP has proposed for upgrades, allowing for a proportion of deferrals and adoption of lower cost options and on the basis that no prospective benefits are identified and that, if they are, then DBP has the incentive to make the necessary investments, EMCa considers that the proposed allowance for enhancements is not reasonable.[5] DBP's proposal provides for a significant upgrade of the 'SAP S4/HANA 2029' system and it is reasonable to consider the need for such an allowance, given that the system went live in 2023. However, within the AA6 timeframe, it may be found that a deferral or an interim investment is possible; also that savings from leveraging between AGIG businesses under the OneERP investment may allow for a lower investment cost to DBNGP customers.[6] The proposed allowances for architecture management and for 'Protecht GRC' appear to provide new functionality, for which the net benefit is not demonstrated.[7] While DBP states that its chosen option (option 2) assumes that it will undertake a risk-based assessment of need over AA6, its proposed program for seven of the proposed upgrades is the same for this option as for option 1, which assumes upgrades according to vendor recommendations.[8] EMCa notes in its review that as a bottom-up forecast, it considers that in applying the management approach described earlier in this subsection involving an "N-1" approach and risk-based criteria, DBP will find that it is able to defer some upgrades and/or is able to avail itself of lower-cost options and/or that some costs will not be attributable to DBNGP.[9]
Application enhancements	7.43	0.00	DBP has not provided evidence that the enhancements that it proposes either will deliver benefits, or will only be undertaken on the basis of providing realisable benefits[10] To the extent that DBP does identify such enhancements, then it is reasonable to expect that they will realise benefits in excess of the investment and which would therefore warrant DBP's investment regardless of the prospective regulatory allowance[11] DBP's 'option 3' would exclude all application enhancements. DBP's determining criterion for rejecting this option appears to be that it "could place business operations at risk if the enhancement is required to address a material issue."[12] EMCa considers the reference to business risk was misplaced for this category, and inconsistent with DBP's explanation of enhancements as providing what are better characterised as operational benefits.[13]

[4] Ibid.
[5] Paragraph 304, ibid.
[6] Paragraph 293, ibid.
[7] Ibid.
[8] Paragraph 294, ibid.
[9] Paragraph 295, ibid.
[10] Paragraph 299, ibid.
[11] Ibid.
[12] Paragraph 300, ibid.
[13] Paragraph 301, ibid.

Table 2.2: Summary of ERA's AA6 draft decision on the IT sustaining apps step change

Issue	DBP Final Plan	ERA Draft Decision	ERA's reasoning
IT applications step change	8.3	0.8	EMCa found DBP had made major investments in business systems providing corporate, commercial and technical support including its development, a new billing system, new HR systems and Maximo business process redesign. 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.

The ERA approved all AA5 capex expenditure on sustaining applications – other than 50% of OneERP costs – as conforming. One ERP is discussed in a separate response paper: Attachment 9.12: One ERP.

1.2 DBP's response to the Draft Decision

We accept the ERA's Draft Decision that AA5 capex for IT sustaining applications is conforming (excluding the S/4 HANA implementation), and have included this expenditure in the AA6 opening capital base.

For AA6, we propose a modified IT sustaining applications capex forecast of $18.0 million. This is $3.3 million lower than our Final Plan and $7.8 million higher than the ERA's Draft Decision.

We have summarised our positions in the table below.

Table 2.3: Summary of revised AA capex and opex, IT sustaining apps, $ million real at 31 December 2024 un-escalated

Issue	Final Plan	Draft Decision	Revised Proposal	Reasoning for revised proposal
TBS upgrades	1.8	0.5	0.8	We propose a modified forecast of $0.8 million for TBS upgrades over AA6. This reflects: • Typical volume and types of changes that will require some work over the period and estimation of effort specific to TBS platform (i.e. not based on historical CRS costs) • Further information demonstrating this includes only enhancement costs for regulated services This is discussed at section 2.2.1 below.
Other application upgrades	12.2	9.7	11.1	We propose a modified forecast of $11.1 million. While we accept, in principle, EMCa's position that we may be able to find opportunities in AA6 to defer some of the planned works, all of these upgrades are necessary to keep the application functional. We may be able to defer upgrades but we will be unlikely to avoid costs in the long run. Despite this, we have applied a bottom-up (rather than top-down) approach to the forecast and sought to identify what upgrades could be shifted. This is discussed at section 2.2.2 below.

Issue	Final Plan	Draft Decision	Revised Proposal	Reasoning for revised proposal
Application enhancements	7.4	0.0	6.1	We reject the ERA's assumption that no application enhancements will be required over the next five years. Not all enhancements are driven by productivity improvements or cost savings and it is unreasonable to exclude all forecast capex on this basis. We have, however, revisited our application enhancements program and identified where we can reduce expenditure. We propose a revised AA6 forecast, which reflects our application enhancement opportunity list, drivers and prioritisation approach, noting some enhancements are driven by compliance, market requirements and business continuity, rather than purely efficiency driven. This is discussed at section 2.2.3 below.
Opex step change	8.3	0.75	5.3	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. To put this assumption in context, in the first quarter of 2025 we found an estimated ~$0.2 million of bankable savings/efficiencies from the OneERP incremental functionality program. Given S/4 HANA is one of our core business applications, it is unreasonable to assume we can uplift benefits to the level assumed by the ERA's consultant, EMCa and applied by the ERA. We propose a modified opex step change that 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. This is discussed at section 2.2.4 below.

1.2.1 TBS upgrades

The TBS upgrades program includes several small investments in our TBS platform to implement system changes necessary to continue business operations. This includes the ability to:

- Add new contracts or update contract structures
- Add new inlet or outlet points
- Add new invoice fields
- Develop new reports or screens, or provide incremental functionality driven by any changes to market, regulatory compliance or shipper requirements over AA6

Based on advice from its consultant EMCa, the ERA considers the capex requirement for TBS upgrades is overstated. EMCa concluded this based on the following views:

- A DBP internal business case for TBS suggested no further capex requirement beyond initial deployment
- That same business case suggested the TBS was much simpler to update than CRS (so historical CRS investment costs are not a relevant comparison)
- Any enhancement related to non-regulated services should not be paid for by DBNGP customers

Our response to these concerns is provided in the following sections.

1.2.1.1 No further capex is required beyond the initial deployment

The internal TBS business case, developed in 2023, was designed to evaluate and inform the investment decision on what TBS solution to implement. While the need for ongoing operating costs was understood and factored into the decision, the future capital cost of enhancements or upgrades were not included in the implementation forecast as they could not be estimated with any accuracy.

Nowhere in the business case does DBP state or infer that no capital costs would be incurred on the TBS again, which appears to be what EMCa is implying. On the contrary, the business case states that the estimate of post implementation/ongoing operating costs '*Does not include cost of enhancements or significant upgrades (would include minor patching)*'.

DBP was aware that upgrades and/or enhancements would be required at some point in the future irrespective of what TBS solution was implemented. The intent was to consider upgrades and enhancements in future business cases (such as in the AA6 review process), at which time we would have more information on TBS requirements and the upgrade cycle.

Given the scope of the initial solution was relatively unknown, any effort to develop the scope or costs associated with a forward upgrades works program is likely to be an ineffective and ineffectual use of our time. Perhaps more importantly though, the uncertainty and potential forecast error in estimating the cost of that program for any particular solution could incorrectly make or break a business case for any one solution. On this basis we excluded the scope of upgrades, instead relying on our ability to scope and negotiate contracts with any vendor commensurately.

Not including the future upgrade costs in the implementation capex forecast does not mean they would never be required and is not a valid reason for excluding them from a future forecast.

From time to time, version upgrades release new features, updates to user interfaces or other changes that require a small amount of effort from DBP such as testing, change management, and/or updates to our knowledge base (i.e. as built documentation, internal procedures or internal process documents). Without a capital program to deliver these system improvements, we would need additional opex allowance for service partners or internal resources to deliver these changes as they arise.

It is also reasonable to expect that once DBP and shippers get familiar with the new TBS platform, opportunities to make small investments to further improve the functionality and user experience will be identified.

1.2.1.2 Historical CRS investment costs are not a relevant comparison

We accept this point and have undertaken a bottom-up analysis of the likely effort and cost associated with incremental functionality upgrades in TBS.

We have estimated the unit cost of a small, medium and large upgrade. On this basis we have revised our estimates. The bottom-up cost, annual volume, and resulting forecast for AA6 is provided in the tables below.

Table 2.4: Examples and costs for small, medium, and large TBS upgrades

Upgrade size	Example functionality upgrade	External services	Internal IT	Internal SME	Other (e.g. hardware, software, network, certificates, pen testing)	Total ($'000)
Small	New report/Small changes to customer portal screen	Consultant or developer [redacted]	App Support Analyst [redacted]	Billing Analyst, Billing Manager [redacted]	10%	**11.7**
Medium	New screens in customer portal and mobile	Consultant or developer [redacted]	App Support Analyst [redacted] Project Mgr [redacted]	Billing Analyst, Billing Manager [redacted]	10%	**47.7**
Large	Modernise B2B interfaces from SFTP to API	Consultant or developer [redacted]	App Support Analyst [redacted] Project Mgr [redacted]	Billing Analyst, Billing Manager [redacted]	10%	**102.7**

Table 2.5: Revised TBS upgrades program, $,000 real at 31 December 2024

	2026	2027	2028	2029	2030	Total AA6
# small upgrades	5	5	2	4	4	**20**
Annual cost small upgrades ($000)	58.7	58.7	23.5	47.0	47.0	**235.0**
# medium upgrades	1	1	1	2	2	**7**
Annual cost Med upgrades ($000)	47.7	47.7	47.7	95.3	95.3	**333.6**
# large upgrades	None	1	1	None	None	**2**
Annual cost large upgrades ($000)	0.0	102.7	102.7	0.0	0.0	**205.4**
Total capex	**106.4**	**209.1**	**173.9**	**142.3**	**142.3**	**774.0**

1.2.1.3 Any enhancement related to non-regulated services should not be paid for by DBNGP customers

Our estimate of investment in the TBS platform included in our AA6 submission is only related to the DBNGP business. We have not forecast any upgrades to the platform that are required by the non-regulated business, as these will be paid for directly by the non-regulated business.

Within the DBNGP business, reference services make up the bulk of our revenue. These reference services (i.e. Full Haul, Part Haul and Back Haul) are the driver for our forecast capex on the TBS platform. To the extent benefits from TBS enhancements flow to the non-reference services on the DBNGP, the regulatory framework already provides for cost sharing. We discuss these mechanisms for rebateable and non-rebateable non-reference services in Attachment 7.2.

For these reasons, we are confident that DBNGP customers will only pay for TBS enhancements related to their services.

1.2.2 Other application upgrades

We operate a suite of IT applications that are integral to the efficient and effective management of the DBNGP. We have a recurrent capital program of work to undertake periodic major and minor upgrades to applications and existing business processes, necessary to maintain application performance (reliable, secure, supported and efficient) or improve fragmented business processes (manage risk, compliance and efficiency).

We consider the upgrade frequency in our original business case was appropriate based on a careful balance of managing risks and costs. Reducing this frequency, by extending the time between upgrades, will lead us to incur additional operating costs for extended support (where it is available) and additional resourcing to manage incidents (the frequency of which increases as the applications age, and the potential cascading effect). Further, extending the time between scheduled updates increases the potential for reactive/rushed upgrades, which would cost more to deliver and often with reduced scope due to shortened timelines. This also increases risks of unplanned outages and security vulnerabilities.

While we accept, in principle, EMCa's position that we may be able to find opportunities in AA6 to defer *some* of the planned upgrades (for example, where applications are performing at an acceptable level, with low-risk security vulnerabilities and vendor support), we do not think it is appropriate to make a broad brush 20% reduction across the board.

We have therefore revisited our application upgrades forecast on a bottom-up basis (rather than top-down) and looked at where we can safely shift upgrade timing or find lower cost alternatives. We also respond to the ERA and EMCa's specific points on the S/4HANA 2029 upgrade timing and costs, the need for architecture management, and Protecht GRC.

Our bottom-up analysis has identified five projects where we consider we may be able to defer upgrades while still keeping risk within our tolerance range. We propose the following adjustments:

- Data archiving – We will instead convert some of the historical data from retired applications to files and archive in SharePoint, allowing for a 20% reduction ($121,000) in the cost of this project. This should have limited impact on risk, but it will cause some reduction in consistency and efficiency of storage, and access to historical data

- HSE Capability (INX) – In line with safety (Zero Harm) commitments, it is critical we upgrade our HSE capability in 2026/2027 to maintain support and leverage mobility capability of newer versions (i.e. mobile access to safety work instructions and real-time incident reporting). We will therefore proceed with the initial implementation as planned. However, we have reduced our forecast in the outer years of the period for ongoing upgrades/improvements. Though we still expect to roll out continuous improvements to our HSE application, these will be considered on a case-by-case basis across AA6, reducing our upfront estimate by $88,000
- Public websites – Based on a recent decision (July 2025) to re-platform our public websites on the [redacted] platform and uplift our website to ensure it is accessible to people of all abilities (i.e. vision impairment, language) by early 2026, the 2028 upgrade proposed in our Final Plan may not be required and may be able to be deferred to AA7 resulting in a reduction of $233,000 in AA6
- Centralised GIS database – We can accommodate a reduced AA6 forecast by slightly reducing the scope and extending the timeframe for data cleansing activities, and planned feature improvements. This will reduce our overall forecast by $277,000. While this increases the risk of data inaccuracies being carried forward, and limits long term operational benefits and efficiency, we consider this risk can be managed within tolerable bounds
- Other core systems – We can accommodate a $200,000 lower AA6 forecast by deferring 2-3 minor application upgrades to AA7

The following table provides some further commentary on our bottom-up analysis for the other applications upgrades.

Table 2.6: IT sustaining apps other upgrades capex 2026-30, $'000 real Dec 2024, un-escalated

Other application upgrades	2026	2027	2028	2029	2030	Final Plan	Revised proposal	Commentary
SAP S4/HANA	-	-	-	3,250	-	**3,250**	**3,250**	SAP 2023 reaches end of mainstream support in 2030, cannot be deferred to AA7 given we have already skipped the 2025 upgrade. Further information set out at 2.2.2.1.
HSE capability - INX	126	119	63	66	69	**443**	**354**	Critical upgrade required in 2026/2027 to maintain support and leverage mobility aspects of newer versions (i.e. mobile access to safety work instructions and real-time incident reporting). Ongoing updates or enhancements will be considered on a case-by-case basis in AA6, reducing spend in the latter years by $~88k.
Data archiving	148	98	108	119	131	**604**	**483**	Reduce costs by converting data to files and archiving in SharePoint for some systems.
Maximo version 9 upgrade	1,600	-	-	1,400	-	**3,000**	**3,000**	The Maximo upgrade to MAS 9.1 SaaS in 2026 is essential to move off extended support and leverage critical mobility features for our field teams. A subsequent upgrade is planned for 2029 to avoid re-entering an extended support scenario and incurring additional costs. This schedule is strategically aligned with our SAP S/4HANA upgrade to achieve project efficiencies, such as by combining testing efforts.
Protecht GRC	385	196	-	168	-	**749**	**749**	We propose to deliver the Protecht upgrade as planned due to the shortcomings of the existing version. Further information set out at 2.2.2.2 below.
SAP SuccessFactors	130	130	130	130	130	**650**	**650**	A dedicated budget for managing the half-yearly SuccessFactors releases is a critical investment. SuccessFactors is a key system for employee lifecycle management and payroll, therefore maintaining system integrity and compliance is paramount. These regular releases are mandatory updates to ensure security and stability and incorporate legislative changes including tax and superannuation.
Public websites	345	-	233	-	-	**578**	**345**	Move to [redacted] platform by early 2026 means the 2028 upgrade may not be required.
Application architecture tool	71	84	102	96	91	**444**	**444**	We recommend not deferring the application architecture tool, as it will underpin application upgrades and management throughout the period. The tool helps manage the architecture landscape and changing technology requirements of the organisation, supporting efficiency in project delivery (i.e. better starting point for system design, better coordination of interdependencies) and day-to-day management (i.e. faster root cause analysis for incidents/problems). Deferring this project will limit our ability to deliver subsequent projects efficiently. Further information set out at 2.2.2.3 below.
Centralised GIS database	80	684	154	231	184	**1,333**	**1,066**	Reduced scope and extended timeframe for data cleansing and planned improvements.
Other core systems	200	200	200	200	200	**1,000**	**800**	Defer 2-3 minor app upgrades to AA7.
Total	**3,085**	**1,511**	**990**	**5,660**	**805**	**12,051**	**11,142**	**= 8% reduction.**

1.2.2.1 S/4HANA 2029 upgrade

The upgrade is not a discretionary enhancement but a critical activity to align with SAP's product lifecycle and prevent significant business and technical risks. The proposed upgrade from S/4HANA 2023 to a newer release in 2029 is a standard and necessary component of responsible SAP lifecycle management to support stable DBP operations.

1.2.2.1.1 Risks of upgrade deferral

Key risks of deferring the S/4HANA upgrade in 2029 are as follows:

- Loss of SAP support – After 2030, AGIG will lose mainstream maintenance from SAP. This means no more regular security patches, bug fixes, or legal compliance updates. AGIG will be on our own to resolve any issues
- Increased support costs – Even if AGIG can find third party support, it will be significantly more expensive and may not be as effective as direct support from SAP
- Security vulnerability – Without security patches, the core AGIG ERP becomes increasingly vulnerable to cyberattacks and data breaches. This is a major risk, especially for a critical system like S/4HANA
- Compliance issues – AGIG may struggle to meet regulatory requirements if our core ERP system is running on an unsupported version. This could lead to fines or other penalties
- Compatibility problems – Older systems may not be compatible with newer SAP technologies or third party applications. This can limit our ability to innovate and integrate with other systems
- Performance issues – Over time, older versions of software can become less efficient and may not be able to handle increasing data volumes or transaction loads
- Limited access to new features – We will miss out on new features and functionalities that could improve our business processes and efficiency
- Higher total cost of ownership in the long run – While delaying the upgrade might save money in the short term, it can lead to higher costs in the long run due to increased support costs, security risks, and lost productivity
- Difficulty retaining skilled resources – It becomes increasingly difficult to retain skilled IT professionals who want to work on the latest technology, or find skilled IT professionals who are familiar with older versions of software

In summary, delaying the upgrade to S/4HANA 2023 beyond 2029 introduces significant technical, financial, and business risks.

1.2.2.1.2 Why is the upgrade due in 2029?

The SAP S/4HANA 2023 release has a clearly defined mainstream maintenance end date in 2030. The proposed upgrade in 2029 is strategically timed to occur before this end date.

We generally adopt an n-1 approach to application versioning and maintain discretion over when to adopt upgrades. The criticality of S/4HANA to our ongoing operations and the flow on-impact of having an out-of-date ERP, means the risk associated with skipping S/4HANA

upgrades is greater than for other applications. Given we are skipping the 2025 S/4HANA release, we do not consider it prudent to also skip the 2029 upgrade.

We also factor in the opportunity presented by each S/4HANA upgrade to derive further value from our ERP. SAP recommends "*multiple, repeatable continuous improvement projects after your upgrade to drive more business value from your SAP S/4HANA solution over time*". Continuous innovation for S/4HANA products is offered through new releases or feature deliveries. This aligns with a proactive approach to technology management and is explicitly supported by SAP's own documentation.

These matters are discussed further below:

- Operational and security risks of skipping the 2029 upgrade:
  - Loss of support – If SAP S/4HANA's mainstream maintenance period ends and extended maintenance is not offered, the product enters "Customer-Specific Maintenance". This means a loss of critical SAP support, including no delivery of new support packages fixing bugs and limited technology updates
  - Security vulnerabilities – SAP provides corrections for the entire mainstream maintenance period, including SAP Security Notes and patches to improve system security. Running an unsupported version after mainstream maintenance ends means a loss of these vital updates, leaving the core AGIG ERP system vulnerable to cyberattacks and data breaches
  - Increased costs – The cost of seeking third-party support or performing emergency fixes for an outdated system would likely be significantly higher than the planned upgrade cost
- Business value and innovation:
  - SAP's strategy states that a "Release", i.e. new version of S/4HANA, indicates a "heavy-lift" with potential data model changes, a new ABAP platform version, and other significant technical changes. A release upgrade is necessary to introduce more innovation and business value into the solution
  - Upgrading enables AGIG to leverage new business innovations, such as improved Fiori user experiences, analytics, and automation, which are essential for maintaining a competitive edge

1.2.2.1.3 What is involved in an S/4HANA upgrade?

An S/4HANA release upgrade is a complex undertaking that requires extensive pre-planning and testing. AGIG, in discussion with SAP and our service partners, estimates an approximate 29-week process (per below). The upgrade must be included in the AA6 plan in 2029 to allow for the necessary lead time to use tools like the "SAP Readiness Check" to identify all impacts well in advance. Deferring this would risk a rushed, more expensive, and less stable implementation.

The high level scope includes:

- Technical upgrade in 4-tiered ERP landscape
- Sandbox, development, quality assurance, pre-production and production on PCE
- Custom-code remediation

- SPAU/SPDD/Custom code remediation will be based on the SAP Readiness Check report & ABAP Test Cockpit (ATC)
- Check analysis of existing AGIG specific functionality
- Conversion of relevant simplification items
- Review and conversion of functionality that is deprecated, mapping to new functionality
- 4 weeks UAT support
- 4 weeks post go-live hypercare support

Figure 2.1: High-level summary of S/4HANA Upgrade

S/4HANA Upgrade – Key Milestones ~29 weeks

Discovery	Prepare	Explore	Realise	Deploy & Run
~ 1 week	~ 3 weeks	~ 7 weeks	~ 14 weeks	~ 4 weeks
Kick-off System Assessment	Finalise Scoping Prod Copy System Preparation	Sandbox Upgrade Fit-Gap Analysis Unit Testing	Non-Prod Upgrade Custom Code Remediation SIT & UAT	Cutover Planning Go-Live Handover to Support & Sign-off
20% AGIG **80%** Service Partner	**30%** AGIG **70%** Service Partner	**30%** AGIG **70%** Service Partner	**40%** AGIG **60%** Service Partner	**50%** AGIG **50%** Service Partner

By planning the S/4HANA upgrade for 2029 (six years after the 2023 release), rather than per SAP's biannual S/4HANA release schedule (e.g. upgrading to the S/4HANA 2025 release), AGIG is already taking a measured and prudent approach that involves a deliberate delay of the upgrade. This was demonstrated in the difference between Options 1 and 2 in our original business case.

Our S/4HANA upgrade strategy is not a deferral in the negative sense, but rather a strategic decision to align with a longer-term, less disruptive upgrade cycle. It demonstrates that AGIG is already balancing the need for ongoing innovation with the practicalities of a complex enterprise-wide application, acknowledging that:

- Upgrades are substantial – As outlined in SAP's strategy, a release upgrade is a "heavy-lift" with potential data model changes and significant technical impacts, not a minor patch
- Costs and effort are managed – By adopting an N-1 upgrade cycle, AGIG is choosing to avoid the annual or biannual cost and disruption of a full upgrade, thus making a prudent decision on behalf of its customers
- Risks are mitigated – The 2029 upgrade plan is towards the end but still within SAP's mainstream maintenance period, ensuring continued security, support, and compliance while providing a buffer against the end-of-life of the 2023 release

By choosing the 2029 upgrade path, we are exercising a considered and risk-based approach to SAP lifecycle management. A further deferral moves outside of the established and prudent maintenance cycle.

The estimated cost for the S/4HANA upgrade was developed in close collaboration with both SAP and our SAP services partners. This process involved detailed discussions of the upgrade scope, effort, and technical requirements. Given the above discussion, we propose the S/4HANA upgrade be delivered in 2029 as originally proposed and maintain the same AA6 expenditure forecast for this work.

1.2.2.2 Protecht GRC

1.2.2.2.1 Business need

To have visibility of the organisation's risk position, a centralised risk management system is imperative. It provides a means to execute a standardised risk framework along with the ability to track, report and develop action plans and assign actions as needed, thereby providing a holistic view and a reliable risk control mechanism.

The current Protecht GRC solution was implemented in 2019. It is used primarily by the Audit and Risk team to track corporate risks, controls, mitigations, audit findings and actions. It is used in a limited capacity by regulatory compliance and operational compliance teams. However, the current version of Protecht has significant gaps in scope and functionality. We therefore proposed to adopt the latest update, which will expand the Protecht footprint to cover:

- Company secretarial activities
- Compliance monitoring (Australian Standards)
- Compliance monitoring (contracts and agreements) e.g. access arrangement, contribution agreements, financial information (bank guarantees, commercial admin, creditworthiness review, debt maturity profile, reporting covenant checklist and reps and warranties details) and insurance renewal certificates
- Compliance monitoring (legislation and licences)
- Foreign Investment Review Board (FIRB) work program
- Insurance
- Land access
- Shippers contracts
- Cyber security governance and risk including cyber risk register, security control libraries, third party risk management (including assessments and reviews)

Protecht was initially implemented with basic capabilities and did not include all business functions. Business critical capabilities such as mapping risks to relevant legislation and enterprise level risk reporting were not included in the initial scope.

As a result of the functional gaps, the tool is proving inefficient and needs to be upgraded to a newer version that includes the missing scope and is better suited to our evolved and evolving business. Scope includes accessing available but unutilised features such as automation, reporting, and inherent workflow capabilities to replace current manual, people dependent processes. The upgrade also features a new control management module to ensure compliance with regulations, standards and control frameworks.

The following table outlines key limitations of the Protecht GRC solution as it is implemented today, and the resulting impact to our risk and compliance functions.

Table 2.7: Summary of Protecht gaps

Business need	Current configuration limitation	Impact on risk and compliance functions
ESG module to manage climate risks and opportunities	ESG controls module (for assurance purposes) not configured	Including ESG Risk Management in Protecht will ensure effective coverage, visibility and tracking of these risks and controls, feed them into the wider organisational risk profile improving our understanding of current risk posture and helping us mitigate risks appropriately through action.
Identify new legislation/regulations, assess their impact for AGIG and then map to risks and obligations to ensure effective ongoing management	Not configured	Mapping risks & obligations to the relevant legislation/regulation helps measure conformity and identify current gaps to be addressed, as well as manage updates and changes to these obligations, any mandatory reporting requirements, in a timely manner – supporting ongoing compliance and minimizing the risk (and associated penalties) of non-compliance. For example Security of Critical Infrastructure compliance.
Compliance breach reporting	Not configured	Compliance breach reporting will allow us to identify the most common breaches, the underlying causes, non-compliance patterns and develop training plans to minimise the causes and therefore occurrences.
Systemisation of third-party vendor management (including third party security risk assessments)	Different teams have different manual solutions	Systemisation of third party vendor and security Risk Management will enable structured and standardised workflow to assess, rate and periodically review the risk on predefined parameters reducing human bias and error, and ensuring the true risk posture of the organisation is captured, tracked and managed.
Cyber security governance and risk including, cyber risk register, security control libraries, third party risk management (including assessments and reviews), FIRB assessments, etc.	Duplicate time and effort in undertaking FIRB reviews Third party risk assessments saved in individual excel templates and emailed between cyber, business and third parties Manual effort to track and follow up third party risk reviews, assignment of controls, when actions are due etc. Manual reporting and audit	Manual version management leading to unreliable Source of Truth Missed or inconsistent information Manual reporting and audit
Intuitive user interface	Interface not updated and missing standards result in a challenging training scenario for new users and inability to scale the platform to new/additional use cases	Platform is not well accepted as perceived to be sub-par and tricky to work with. Processes are not standardised.
Easy to augment	Requires technical expertise to make even minor changes	Time & cost required to implement a feature.

1.2.2.2.2 Protecht GRC – Options

We considered several options for addressing the additional governance and risk needs of our business. In summary, the options are:

- Option 1 – Do nothing, maintain limited functionality and use of GRC tool
- Option 2 – Implement a replacement enterprise grade GRC tool
- Option 3 – Upgrade Protecht GRC implementation and ongoing support

We eliminated Option 1, as maintaining limited functionality and use of GRC tool across our business limits our ability to effectively, efficiently and consistently manage risk and compliance. It also makes it difficult to provide a holistic view of enterprise risk, controls and action compliance. Manual, siloed processes are also prone to human error, and do not allow for intelligent insights and pattern recognition required to drive continuous improvement.

Option 3 is preferred to Option 2, as Protecht is a relatively low cost GRC tool that has the potential to meet the majority of the current needs of DBP. The upgrade can be delivered in a shorter timeframe, with less business disruption, than replacing the system. It is also the most prudent approach to deliver on current and future business needs at the lowest sustainable cost.

1.2.2.2.3 Protecht GRC – Business benefits

A robust system supporting DBP's GRC Framework helps identify, assess and address the immediate as well as long term risks and enhances organisational resilience which is critical for business continuity.

Benefits include but are not limited to:

- Transparency – One of the most significant advantages with a centralised view of governance, risk, and compliance activities is the visibility of the organisation's risk profile, performance metrics, and compliance status, empowering business to make data-driven decisions, identify potential vulnerabilities, and respond proactively to emerging threats
- Standardisation – Standardised policies, procedures, and controls ensure uniform compliance practices across all departments enable alignment between Risk frameworks and strategic business initiatives. This consistency also improves stakeholder confidence, as customers, partners, and regulators recognise our commitment to ethical practices and continuous improvement
- Cost avoidance – Effective GRC implementation can lead to substantial cost avoidance by reducing redundancies in controls, audits, and reporting processes. Automated workflows minimise the need for manual interventions, decreasing administrative costs and the likelihood of human error. Additionally, proactive risk management helps prevent regulatory fines, legal disputes, and reputational damage

We are not able to accurately quantify these benefits at this time. However, given the business need and the shortcomings of the current system, we do not consider the absence of a quantified net benefit assessment should be a barrier to making what is a relatively low cost upgrade to an already established application. We therefore maintain that the original $749,000 investment in Protecht is justified, is based on vendor estimates, and should be included in the AA6 capex forecast as conforming capex. We will endeavour to outperform this forecast where practicable.

1.2.2.3 Architecture management

An enterprise architecture tool helps with managing an organisation's IT architecture landscape and our changing technology requirements. It supports efficiency in technology project delivery (i.e. better starting point for system design, better coordination of interdependencies) and day-to-day management (i.e. faster root cause analysis for incidents/problems).

1.2.2.3.1 Business need

We recently undertook a COBIT[14] Maturity Assessment as part of our Internal Audit Plan. The review focused on assessing current state and improvement opportunities. We achieved a Maturity Rating of 2 (out of 5) against the governance objective "Manage enterprise architecture".

In our current state, we found:

- There are enterprise architecture principles, standards
- Enterprise Architecture is focussed on the application domain, and reviews work done by infrastructure and cyber security architects and domain owners
- Current state documentation exists for areas addressed recently but is inconsistent for other areas

Two improvement opportunities were identified:

- Continue to improve and ensure alignment with enterprise architecture principles and governance processes
- Get broader coverage of the environment with architectural documentation

The current DBP IT landscape is characterised by fragmented systems. This leads to potential inefficiencies and misses opportunities for innovation and improvement. Implementing an architecture management tool will enable us to construct a single-source-of-truth blueprint of our IT architecture, ensuring it supports our business objectives efficiently.

Compared to the current tools in use (Visio, Excel, SharePoint), an architecture management tool brings together technical architecture, application and data architecture, and business architecture. The visibility and insight this brings across the whole IT landscape can help reduce complexity and technical debt through strategic planning and roadmaps enabling simplification across the IT landscape, promoting reduced total cost of ownership for our technology footprint.

Further, the way we transmit gas data and information to our customers is evolving via the growing use of digital technologies. This makes it even more important to consolidate knowledge using a fit-for-purpose tool, helping us ensure proper understanding, visibility, governance, risk and compliance management of these technologies and their role in supporting operational processes. Our plan for the next five years includes a digital transformation with a shift towards platforms and software as a service, and a drive to understand how our existing data IP can be used to reduce costs through analysis and reporting. How we transition across the target landscape will be critical for our future success.

[14] COBIT is a framework published by the Information Systems and Control Association (ISACA) that helps enterprises create optimal value from IT by maintaining a balance between realising benefits and optimising risk levels and resource use.

There is a clear drive to move away from the existing manual processes. We believe an 'off-the-shelf' tool could be adopted at a lower cost than developing a custom in-house solution. Given SAP is a prominent technology in the DBP and AGIG IT landscape, the [redacted] tool has been assessed as potentially the best fit. The following table sets out a comparison of the current state (as is) and future state (to be) process.

Table 2.8: Summary of application architecture current and future state

Item	Current state (as is)	Future state (to be)
Tools	Static Visio diagrams, Excel and SharePoint.	Dynamic visualization and customizable fact sheets enabling strategic IT investment and disinvestment decisions.
Scope	Focused on Category A and B applications. No linkage to the underlying tech stack. No integration with CMDB knowledge base.	Provides a full view of our Technology Stack of all layers – Business, Data, Application and Infrastructure.
Interdependencies	No visibility to inter-dependencies and impact of changes to architecture.	Visibility to all moving parts and lifecycle of the architecture components helps identify the interdependencies at any point of the Roadmap.
Accuracy	Retrospectively updated following large implementations currently.	Capability to develop proactive solution architectures in line with the target enterprise architecture.
Risk management	Dependent on people's capability to detect risks and action.	Multi-dimensional visibility into the landscape to proactively uncover and address any risks and vulnerabilities before they impact critical applications and associated components.
Lifecycle management	Lack of lifecycle information on the static architecture.	Proactively manage the emerging, contained and retiring/retired technology components and integrating with our CMDB.
Technology stack	Lack of solution patterns and strategic use of resources with diverse technologies across the landscape.	Helps build strategic solution patterns and contain the landscape with approved technologies and their prescribed purpose.
Transition roadmaps	In absence of a complete and dynamic current state and lack of a strategic target state, transition roadmaps do not exist and are a challenge to develop manually for an ever-evolving landscape.	Enables multiple road maps supporting agile delivery to achieve the target state.
Optimization and Rationalization	Updates are reactive and there is no visibility to rationalisation opportunities.	A clear view of the landscape highlights opportunities for optimisation and rationalisation. Develop supporting processes to keep the tool up to date, always reflecting the live landscape.

Figure 2.2 provides an example of how the [redacted] helps tie our IT architectural information together.

Figure 2.2: Overview of links in architectural information

1.2.2.3.2 Architecture management system - options

We considered several options for implementing an application architecture solution. In summary, the options are:

- Option 1 – Develop custom in-house solution
- Option 2 – Implement a commercial tool
- Option 3 – No change to existing manual processes

We eliminated Option 3, as it is clear that the existing manual processes should not continue, particularly given the ongoing AGIG-wide implementation of a single enterprise resource planning application (SAP S/4HANA). The SAP S/4HANA implementation provides opportunity to standardise other applications across AGIG, therefore it makes sense to implement an enterprise-wide application architecture tool that is compatible with SAP S/4HANA.

With this in mind, we have selected Option 2 as the most viable solution. There are a number of 'off-the-shelf' tools that could be adopted at a lower cost than developing a bespoke in-house solution. Products such as SAP's LeanIX can be tailored to meet DBP's requirements, offering a single application architecture management solution across all AGIG businesses that can also integrate with SAP S/4HANA.

1.2.2.3.3 Business benefits

Implementing better application architecture management would offer several benefits for DBP including enhancing cyber security risk and compliance management, IT decision-making, and alignment of IT with business objectives. Application architecture can also provide continuous insights into how IT architecture can adapt to changing business needs. A summary of benefits is provided below:

- Enhanced decision-making – By providing comprehensive insights into the IT environment, application architecture tools enable better decision-making at both strategic and operational levels. Stakeholders can assess the impact of proposed changes, evaluate alternatives, and prioritise initiatives based on their alignment with business goals
- Risk management and compliance – Application architecture tools provide a framework for assessing and managing risks associated with IT systems and processes, including cyber security and regulatory compliance. By identifying vulnerabilities, ensuring compliance with regulations and standards, and implementing robust governance practices, organisations can mitigate risks and enhance security posture
- Improved visibility and transparency – Application architecture tools provide a centralised platform for documenting and visualising the entire IT landscape, including applications, infrastructure, data, and processes. This enhanced visibility allows stakeholders to understand the relationships between different components and make informed decisions
- Support for digital transformation – Application architecture tools play a crucial role in modernising IT infrastructure, integrating new technologies, and aligning IT with business strategy. Architecture management tools provide the visibility and governance needed to drive successful digital initiatives
- Efficient use of IT resources – Architecture management tools help identify redundant systems, overlaps, and opportunities for consolidation. This can lead to cost savings and more efficient use of IT resources
- Facilitated communication and collaboration –architecture management tools promote collaboration among different stakeholders, including IT teams, business units, and external partners. By providing a common platform for architecture communication, surveys and documentation, these tools foster cross-functional collaboration and engagement

1.2.3 Application enhancements

Like with any investment, we cannot expect to realise the full potential of our applications if we take a 'set and forget' approach. Not undertaking incremental development shortens the useful life of our applications and is inconsistent with prudent asset management and good practice for modern enterprise systems.

Application enhancements are not solely driven by operational efficiency or productivity improvement. There are many drivers for new business requests/enhancement opportunities including operational, regulatory, audit compliance, market, and customer needs. Enhancement work also covers bug fixes and activating/deactivating application functions.

The application enhancements program we put forward in our Final Plan provided for priority market, risk and compliance driven enhancements (based on historical volumes of these types of enhancements), plus some prioritised operational and customer driven enhancements.

We do not accept the ERA's Draft Decision to remove this allowance altogether. While we accept in principle that the application enhancements program forecast could be revised downwards via a more granular look at business requirements, we do not consider it reasonable or realistic to assume zero enhancements will be required over the next five years.

We have reviewed our backlog of ongoing enhancements and expected future business needs, and propose a modified forecast for our applications enhancement program of $6.1 million over AA6. This is $1.3 million lower than our Final Plan.

In support of this, we have provided additional information that shows the current backlog of business requests/enhancement opportunities, the drivers for these (i.e. whether risk or cost benefit) and our prioritisation approach, including the highest priority enhancements we expect to target in AA6.

Note the backlog of opportunities is merely a snapshot at the current point in time. It is dynamic and we are continually assessing and reassessing what can and should be delivered and when. We work with the business to prioritise the enhancements and deliver the best value investment for DBP and its customers.

Our revised application enhancement forecast is presented in the table below, with further discussion in the sections that follow.

Table 2.9: Revised application enhancements program, $ million real at 31 December 2024, un-escalated

Application enhancements	Final Plan	Draft Decision	Revised proposal	Description
Core business applications	2.8	0	2.1	We have reduced the scope of our enhancement program and will focus on P2 enhancements or higher
Contract Management System (Commercial Tool)	0.3	0	0	We will continue to pursue the need for a CMS and will seek to uplift our current CMS practices either via potential enhancements to S/4HANA or as part of the broader core business applications upgrades program
Maximo incremental functionality	1.0	0	4.0	We manage incremental functionality across OneERP (i.e. SAP S/4HANA, Maximo and Success Factors) as a single program. We have modified our forecast but maintain the need for an enhancements provision for S/4HANA and Maximo over the next five years
S/4HANA incremental functionality	3.3	0		
AA6 total	**7.4**	**0.0**	**6.1**	

1.2.3.1 Core business applications

The core business applications enhancements program covers all applications excluding TBS, S/4 HANA, SuccessFactors and Maximo. The budget covers minor works and lower tier projects only, i.e. enhancements that are relatively easy to implement, or low value, and do not require full PMO governance or a full/dedicated project team to be stood up.

The needs of our business and our customers are continually changing. From time to time we must make changes, fixes and adjustments to our suite of applications to ensure they are providing our staff the functionality they need to be able to provide customers the service they want, and meet the expectations of other external stakeholders (such as regulators, government departments, land owners and developers). Some of these enhancements are simple bug fixes or adding a function/module to an existing application, while others might involve a complete rework of an existing application or replacement with a more advanced piece of software.

Our IT team monitors application performance and business needs, and records opportunities for application enhancements. Our System Enhancements Opportunity List (provided in Appendix C) presents the current backlog of enhancement opportunities (excluding TBS, S/4HANA, SuccessFactors and Maximo) and prioritises them for implementation. Enhancement opportunities can be identified by the IT team or raised by users. These are then assessed and prioritised against the matrix below.

Table 2.10: System enhancements prioritisation matrix

			Urgent Risk = extreme Must be addressed immediately	**High** Risk = high 30 days or in line with regulatory/audit action timeframes	**Medium** Risk= intermediate 2-6 months or as soon as practicable if enhancements will help AGIG achieve safety, reliability or customer impact targets	**Low** Risk = low/negligible No time limit but aim is to deliver when practicable if it may result in process improvement, automation or efficiency
Impact & benefit	**Organisation**	>$100k or 1 FTE	Priority 1	Priority 1	Priority 2	Priority 3
	Site	$50k-$100k or 0.5-1 FTE	Priority 1	Priority 1	Priority 2	Priority 3
	Department	$25k-$50k or 0.25-0.5 FTE	Priority 2	Priority 3	Priority 4	Priority 4
	Team	<$25k or 0.25 FTE	Priority 3	Priority 3	Priority 4	Priority 4
	Individual	Intangible	Priority 3	Priority 4	Priority 4	Priority 4

Priority 1 enhancements are those that are either addressing an extreme or high risk, or will deliver a recurrent benefit of more than $50,000 or 0.5 FTE. Priority 1 enhancements are rare

and must be addressed immediately. The majority of enhancement opportunities fall in Priority 2 to 4 categories and are delivered accordingly.

Our current System Enhancements Opportunity List contains no Priority 1 initiatives; however we have identified Priority 2 initiatives across four applications: Data Analytics and Visualisation (DAV), the Contract Management System, Mipela, and the Investor Portal.

Our revised core application enhancements program proposes to address these Priority 2 initiatives only, at a total estimated cost of $2.1 million. The Priority 2 enhancements are summarised below.

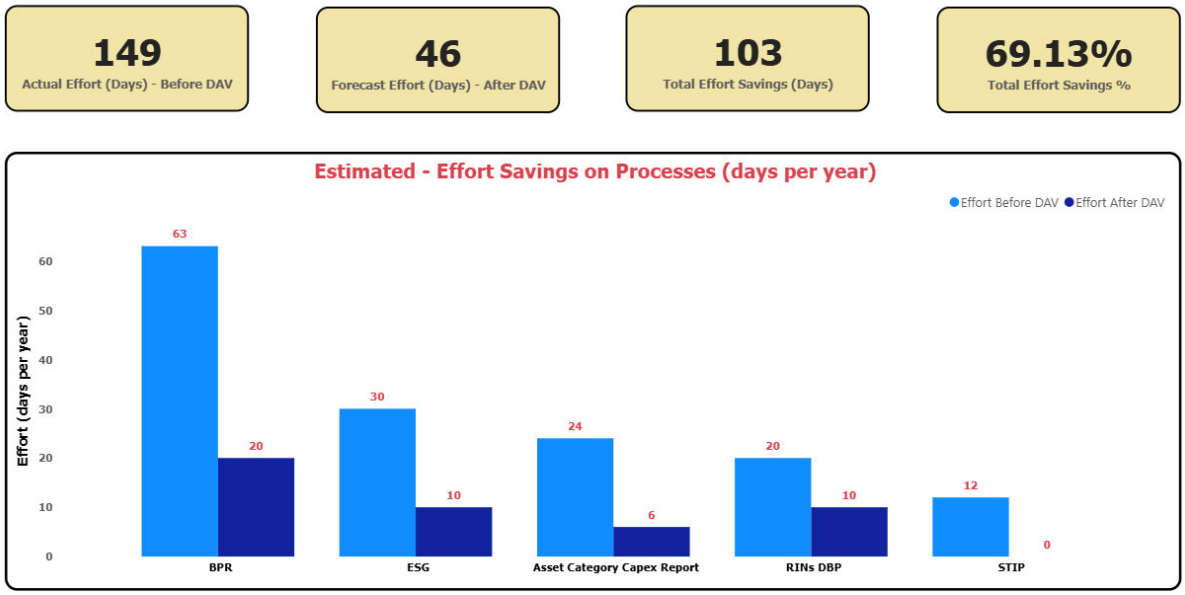
1.2.3.1.1 Data Analytics and Visualisation (DAV)

At AGIG, data is a key asset that supports the business in making informed decisions across the business. AGIG's Data Analytics and Visualisation (DAV) platform using [redacted] capabilities has been implemented for other AGIG entities enabling much needed reporting and analytics. There is a strong case to roll it out to DBP to deliver automated reporting, centralised access to data, reduce duplication and risk of human error, and ensure effective reporting internally and externally.

DAV solutions are commonplace in network and utilities businesses. They are used to help maximise the value of data and allow technologies such as artificial intelligence (AI) and machine learning to be deployed across the organisation. DAV delivers predictive insights enabling optimised asset maintenance and compliance with finance and safety controls. It does this by enhancing the data quality, data governance and self-service capability. The data analytics component also establishes foundational capabilities for field technologies like the internet of things (IoT) and AI computer vision, which can enable safer asset inspection practices.

Predictive insights enable faster decision making and action. Figure 2.2 below summarises the estimated time taken to complete activities such as ESG reporting, RIN reporting and asset category capex reporting with and without DAV in place. These insights can accelerate our safety and sustainability targets and bring efficiencies in asset management and overall cost savings.

Figure 2.3: Estimated effort of key reporting processes with and without a DAV



Our revised proposal splits the identified DAV opportunities into two categories:

1. Core use cases, such as asset inspection data, financial and gas throughput/flow data, transmission operations and transmission asset management key performance indicators – which remain a Priority 2 initiative to be delivered in AA6
2. Extended use cases, such as team-based visualisation and analytics around predictive asset failure/maintenance, commercial operations (i.e. bringing together billing and asset data related to specific services) – which are ranked as Priority 4 initiatives, and will not, at this stage, be targeted for delivery in AA6

We estimate around $855,000 investment to deliver the DBNGP core use cases in DAV.

1.2.3.1.2 Contract Management System

We currently manage contracts with 65 shippers and customers. These contracts are not only high value [redacted] but also highly complex, with 95% being regulated.

Some agreements are structured as a parent contract with multiple linked child contracts. Others involve 2 to 10 separate contracts with the same shipper, each serving different purposes, such as transport or inlet services. Managing these requires extensive documentation and administrative effort, making the process heavily person-dependent and prone to errors, especially when identifying and executing the correct contract version.

As discussed in the AA6 business case, a 2023 internal audit identified weaknesses in controls over procurement and contractor/vendor management and flagged the lack of a robust contract management system to be a significant risk. There have been a number of errors resulting from the current manual processes related to the DBNGP, predominantly relating to shipper contracts, which have on occasion been subject to data entry mistakes leading to incorrect volumes and pricing terms. Our current manual processes can also lead to version control issues.

Our current processes also make it unnecessarily difficult for shippers to process/propose contract revisions, and cannot efficiently deal with the scale we require.

We therefore propose adopting a CMS solution during the AA6 period. Although this requires a new solution to be implemented, we consider it can be delivered by our internal teams and can be delivered as part of the core applications enhancement works. We also have opportunity to leverage S/4HANA functionalities and will look at how we can make best use of the applications already available to us.

Our initial focus will be on implementing a solution for shipper contracts, as these carry the biggest risk and potential financial/legal consequences. The shipper solution will be 100% dedicated to the DBNGP.

This shipper CMS solution will be complemented by a robust supplier CMS solution/module in the future, however, this would be an AGIG-wide initiative. Our focus for this AA6 submission is the DBNGP shipper solution only.

The current estimate for the DBNGP shipper CMS is around $860,000, which will form part of our core application enhancements budget.

1.2.3.1.3 Mipela

The DBNGP is located in an infrastructure corridor owned by the State Government of WA through the DBNGP Land Access Minister and it is managed by the Department of Planning,

Lands and Heritage's Infrastructure Corridor Branch. Property owners, pipeline operators and third parties that wish to carry out activities or works within this corridor need to seek the Minister's approval under Section 41 of the *Dampier to Bunbury Pipeline Act 1997*.

To support safer infrastructure development and improve compliance to Section 41 notifications we are looking to streamline the process through integration of Before You Dig Australia (BYDA) and Pipeline Operator Third Party Works Systems (TPW). This ensures all excavation or development notifications near critical infrastructure are tracked, responded to, and resolved efficiently reducing delays, regulatory risk, and safety incidents.

We are also looking to enable the mobility functions within Mipela, which aligns with our broader strategy to increase field mobility, leveraging the mobility functions that exist across our applications suite.

These Mipela enhancements are relatively low cost, at $260,000 in total.

1.2.3.1.4 Investor Portal

The Investor Portal supports investor relations functions for AGIG and all its businesses, including DBP. It provides a web portal where current and prospective investors can interact with key business information and documentation related to their investment, including ESG reports, rating agency reports, investor roadshow packs, etc.

The current solution is a custom build .NET application built in 2018. It can no longer be maintained long term, with further code deprecation due at the end of October this year (SQL APIs), following remediation in June 2025 of the deprecated Azure Graph API. During this work a number of other issues were identified with old code that can no longer be supported.

As further deprecations occur, we expect ~$10-15,000 required for each remediation, with the application becoming increasingly unstable as these issues are 'patched' up (e.g. increased workarounds to make older code work with newer code).

Without a working Investor Portal, the Treasury team would have to go back to manual email interactions with ~200 investor stakeholders, increasing their time and effort, introducing increased security risk for sensitive business information and reflecting poorly on AGIG and DBP's reputation. All of this is likely to impact the competitiveness of AGIG and DBP's debt costs.

This work will deliver a replacement or rebuild for the Investor Portal. Costs for the Investor Portal are shared across the AGIG entities, with DBP's allocation being $109,000.

1.2.3.2 SAP S/4 and Maximo incremental functionality

We manage incremental functionality across OneERP (i.e. SAP S/4HANA, Maximo and Success Factors) as a single program. S/4HANA and Maximo are heavily interrelated, both being central to our business operations and asset management. Any enhancements made to one application generally impacts the other, with our focus being on maximising value from S/4HANA as the core enterprise platform (see One ERP roadmap and architecture diagrams in Appendix B).

Non-recurrent enhancements (distinct from the recurrent upgrades program) are evaluated on a case-by-case basis governed by our two-tier improvement management process outlined in Appendix A. This helps ensure each need is delivered cost-effectively and flow on impacts to other systems are incorporated.

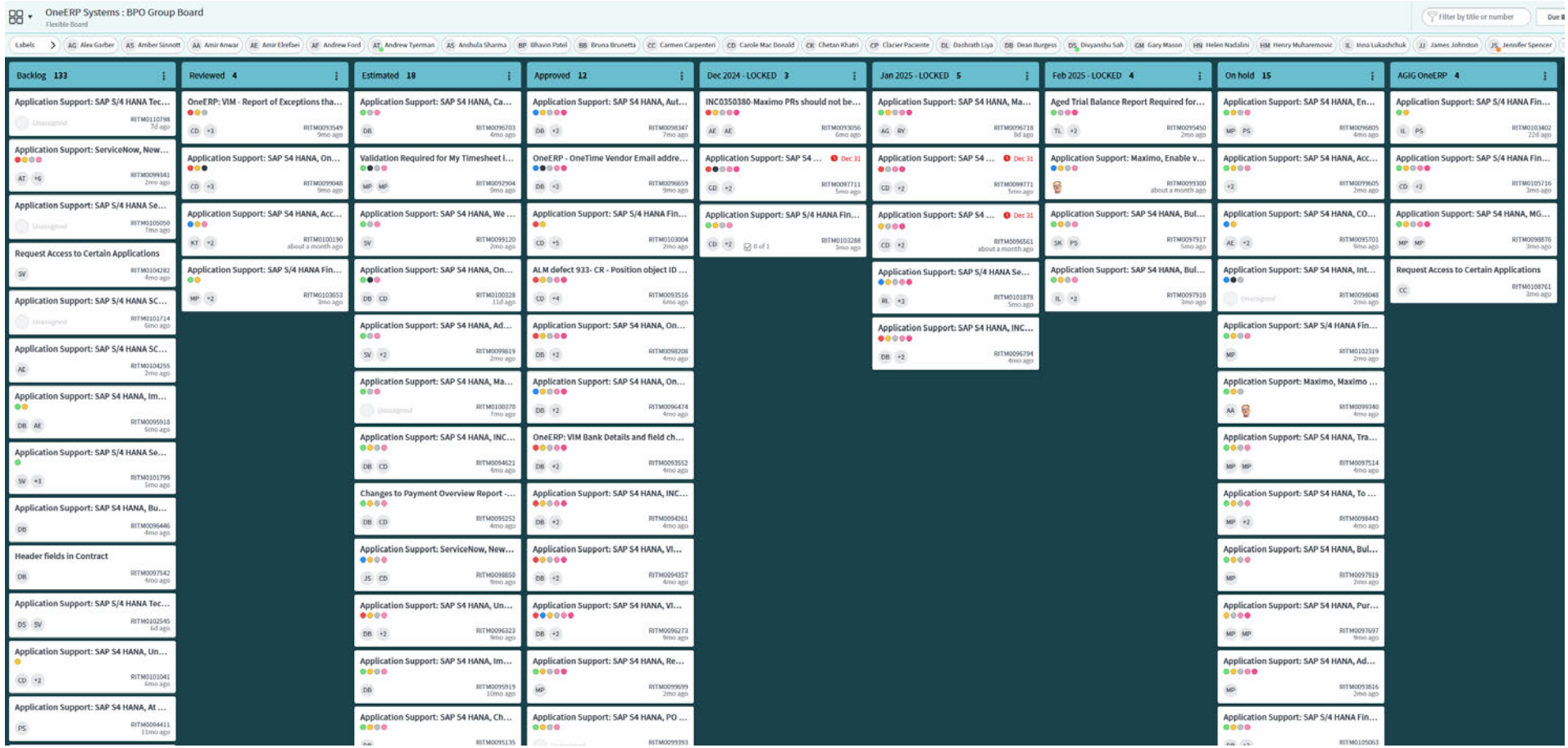
We do not accept the ERA's Draft Decision to not provide any revenue allowance for incremental functionality for S/4HANA and Maximo during the AA6 period.

There is already a backlog of minor works and enhancements to S/4HANA and Maximo (see Figure 2.4 below) identified as required for AA6, and it is unreasonable to assume there will be no new non-recurrent business requirements that necessitate changes to these two applications during the period. For example, we expect enhancements will be required during the next five years that relate to:

- Regulatory & reporting changes:
  - Mandatory sustainability reporting – New regulations requiring mandatory climate-related financial disclosures will necessitate systems enhancements for data collection, analysis, and reporting, e.g. of Scope 1, 2 and 3 emissions
  - Customer protection and affordability – The focus on customer-centricity, affordability, and vulnerability drives the need for enhancements to improve customer service
- Competitive and operational pressures:
  - Digital transformation: The industry is undergoing a significant digital transformation to improve efficiency, safety, and sustainability. This includes:
    - Internet of Things (IoT) – Integrating IoT sensors with systems like Maximo for real-time asset monitoring and predictive maintenance, moving from reactive to proactive maintenance reducing costly unplanned outages and improving asset longevity
    - Automation and AI – Leveraging AI and machine learning in ERP systems like S/4HANA to automate business processes, predict business outcomes, improve data analytics and data-driven decisions, and optimise supply chains. The ability to adopt these innovations is tied directly to our continuous enhancement and upgrade program
    - Data-driven decision making – Using advanced analytics to make more informed decisions on network planning and resource allocation
  - Changing gas demand – The move to sustainable gas supply and overall energy efficiency measures requires enhancements to optimise asset management and operational processes to maintain our business into the future

These are no longer "nice-to-have" features, they are essential capabilities for a modern, efficient, and safe gas infrastructure business in an evolving Australian gas utilities industry. Therefore, having funds to undertake incremental functionality enhancements of our systems is prudent.

Figure 2.4: OneERP enhancements backlog

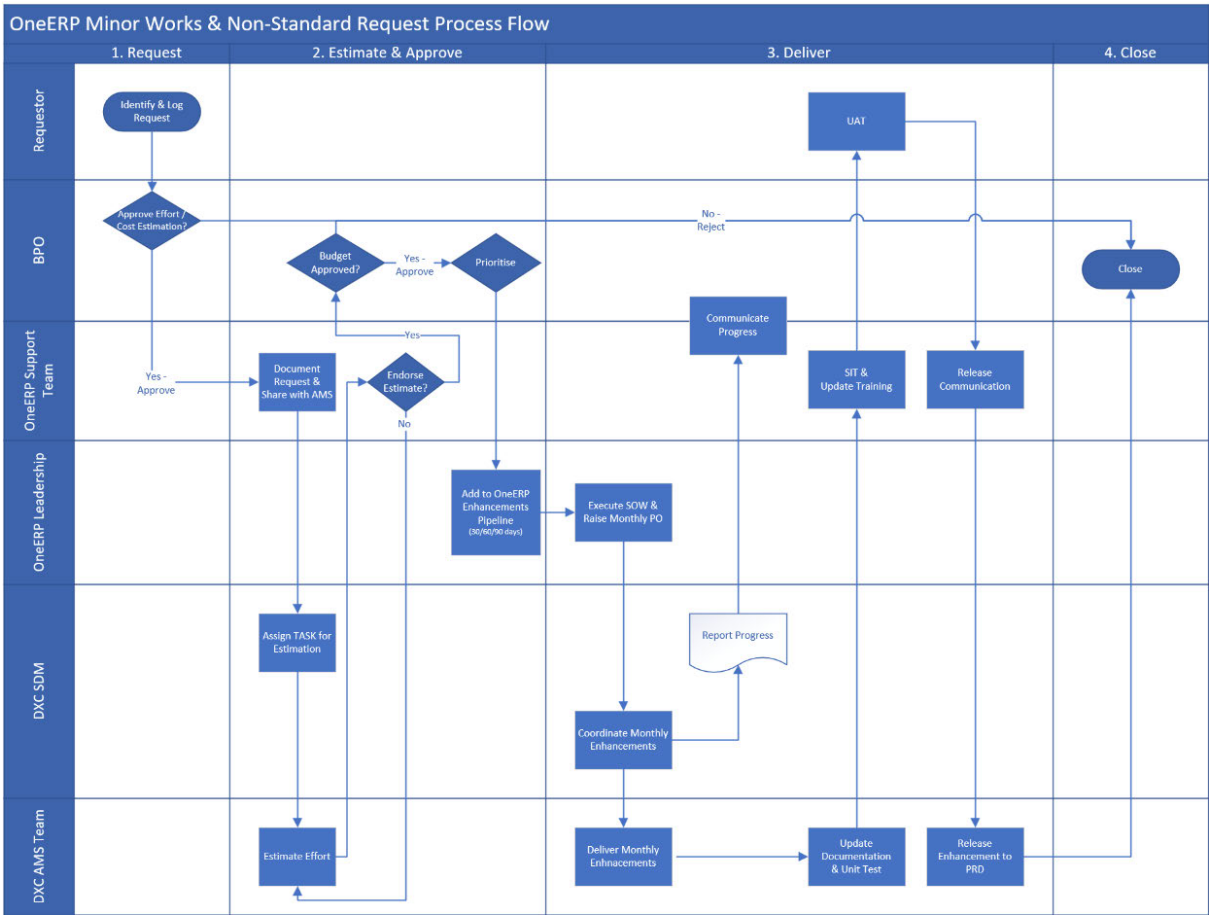


EMCa's advice to the ERA to exclude all application enhancements was founded on its view that all enhancements should deliver quantifiable benefits and that AGIG has not provided cost-benefit analysis to support this program of work. We consider this view to be invalid.

Not all enhancements are driven by efficiencies or productivity improvements. Many are required to fulfil a business need, address a risk, or fix something that isn't working properly and therefore result in cost avoidance or prevent decreases in productivity. These projects still satisfy NGR 79 without an NPV.

While not every fix to every application DBP uses is subject to an NPV assessment (or similar), for the OneERP suite of applications we have a robust, multi-stage enhancement workflow (see Figure 2) that ensures every request is vetted, estimated, and subject to cost-benefit assessment.

Figure 2.5: OneERP minor works and non-standard request process flow



When assessing S/4HANA, Maximo or SuccessFactors enhancements, we apply the above workflow and the value estimation methodology summarised in the Enhancement Calculation Matrix in Figure 2.7.

Figure 2.6: Enhancement Calculation Matrix

Enhancement Calculation Matrix

All enhancements are filtered through business priority matrix and the value calculation matrix

Enhancement Metric	Opportunity		Capex investment	Measurable business benefit
Cost avoidance	Total financial exposure in Aud Per Annum	-	Hours invested	= $ saved per Annum
Process Streamlining	Hours saved per Annum (at $100 ph.)	-	Hours invested	= $ saved per Annum
Policy & regulatory alignment	Estimated cost of Risk per Annum	-	Hours invested	= $ saved per Annum
Incident fix	Business impact in lost productivity or manual effort hours per Annum	-	Hours invested	= $ saved per Annum
User experience improvement	Realised Business productivity in hours per Annum	-	Hours invested	= $ saved per Annum
Data accuracy & consistency	Realised Business productivity in hours per Annum	-	Hours invested	= $ saved per Annum
Workflow improvement	Realised Business productivity in hours per Annum	-	Hours invested	= $ saved per Annum

Basic units of calculation:
- $100 ph. Internal AGIG team effort
- $202 ph. AMS ($1540 day rate / 7.6 = $202)

Effort
- Weekly impact in hrs x 50 weeks = per annum
- Example 7.6hrsx $100 x 50 weeks = $38k impact per annum

Using the enhancement calculation matrix summarised above, we have attempted to quantify the benefits of OneERP enhancements and use this to help inform and prioritise the work program. Note these assessments are indicative only, used for the purpose of prioritisation and are not considered a forecast of bankable savings/efficiencies.

Based on our analysis of enhancements delivered between January and April 2025, we undertook 40 OneERP enhancements, at a total cost of $339,000, which we estimate could deliver bankable savings/efficiencies of $203,500, with other quantifiable benefits (i.e. cost avoidance) in excess of $1 million (see Table 2.11).

Table 2.11: Summary of OneERP enhancements (total AGIG), Q1 2025

Driver	#	Total Cost	Estimate of gross bankable savings/ efficiencies	Estimate of gross other quantifiable benefits
Data Accuracy & Consistency	1	980	-	16,500
Incident fix	5	93,720	-	310,500
Policy & Regulatory Alignment	9	110,070	-	347,500
Process Streamlining	18	82,645	127,000	421,500
System Stability & Reliability	1	2,730	10,000	-
User Experience Improvement	3	19,489	66,500	5,000
Other	3	29,412	-	114,000
Grand Total	**40**	**339,047**	**203,500**	**1,215,000**

While we cannot precisely forecast what level of benefit we will be able to deliver over the next five years, we are confident our ongoing enhancements program will deliver benefits either in terms of cost avoidance or productivity improvement. Nevertheless, we do not consider we will be able to deliver the $1.5 million of efficiencies EMCa assumes will be achievable and has deducted from our ongoing opex forecast per year, compounding over the five year period (see section 2.2.4 below).

EMCa has also assumed it is reasonable to expect DBP's application enhancements will generally realise benefits in excess of the investment, *which would therefore warrant DBP's*

investment regardless of the prospective regulatory allowance.[15] While this may be the case prima facie, it is important to highlight the impact of the regulatory allowance on a regulated business' activities.

Under the regulatory framework, DBP's expenditure is subject to annual RIN reporting and an ex-post review at the end of each regulatory period. Historically, the ERA's expectation is that DBP will spend within its regulatory allowance, with the ERA placing heavy scrutiny on any expenditure that exceeds allowances or varies in scope from what was proposed in the forecast five years prior. This compels DBP to be conservative in its expenditure and avoid speculative investment that may be deemed non-conforming in retrospect by the ERA.

This means that even though application enhancements might result in cost efficiencies and could in theory pay for themselves, DBP would be reluctant to deliver enhancements unless there is explicit provision for them in the regulatory expenditure allowance. This is a fundamental constraint of the regulatory framework; the revenue allowance is determined based on assumed efficiencies, yet at the same time the expenditure proposed to deliver those efficiencies can be deemed inefficient and excluded from the forecast.

We therefore submit it is not reasonable to provide zero dollars in the capital expenditure forecast for applications and to do so inhibits the pursuit of IT efficiency. DBP requires a degree of confidence in its regulated returns so that it can invest in its IT applications for the benefit of its employees and shippers, noting that customers will only pay for capex that is actually incurred.

Since S/4HANA went live in October 2023, AGIG has incurred approximately $1.5 million to implement application enhancements, addressing minor post go-live refinements and unlocking initial opportunities to enhance the user experience and streamline workflows. Leveraging this initial investment, we are keeping abreast of the latest SAP roadmaps, versions, releases and features. This ensures we are well-informed about SAP's future direction and can strategically align potential S/4HANA functionalities with Maximo's functions and evolving business needs. As business stakeholders come to IT with their requirements, we will have a clear understanding of the available SAP capabilities to address them effectively.

We therefore consider our estimate of approximately $1 million per year to be budgeted for S/4HANA enhancements, of which 65% is attributable to DBP, is reasonable, but have made a small downwards adjustment in DBP's allocation from $3.25 million to a total of $3 million over the AA6 period.

If we apply a similar logic for Maximo investments, we submit that a provision broadly consistent with historical expenditure on enhancements is appropriate. Over the past five years we have incurred $150,000 to $200,000 per year in Maximo functionality changes, fixes and improvements, incurring $172,000 in 2024. We maintain our position that a budget of $200,000 per year to accommodate Maximo enhancements ($1 million over the period) is reasonable.

The current Maximo incremental functionality opportunities identified to enhance asset management maturity during AA6 total around $1.3 million. These known gaps within the current Maximo configuration, will be remedied on a priority basis, in line with our broader asset management maturity improvement program defined in the DBP Asset Management Maturity Improvement Program. These opportunities are provided in Appendix B.

[15] Paragraph 416, Review of Proposed DBNGP Access Arrangement (AA6) 2026 – 2030, EMCa, June 2025.

This brings the combined application enhancements forecast expenditure for S/4HANA and Maximo to $4 million across the five-year period. We propose this is a reasonable estimate developed using the best information available in the circumstances, and we will endeavour to work within this regulatory allowance.

1.2.4 Opex step change

The applications opex step change of $8.3 million over AA6 is primarily driven by:

- Software subscription and ongoing support for SuccessFactors, our integrated human capital management solution delivered in 2025 (net of ongoing support savings from the decommissioned PayGlobal payroll system)
- Software subscription and ongoing support for TBS (net of ongoing support savings from the soon to be decommissioned CRS)
- The transition of SAP S/4HANA and SuccessFactors to the SAP RISE platform and the associated software as a service (SaaS) subscription models, driven by vendor upgrade paths (net of current Azure hosting costs for these applications)
- Ongoing SaaS subscription for Maximo 9 following the upgrade from Maximo 7, driven by vendor upgrade path (net of current Azure hosting costs for Maximo 7)

Taking advice from EMCa, the ERA considers a step change of $0.8 million to be prudent and reasonable. While EMCa agrees "some increase in operating costs may be required"[16], it proposes an offsetting efficiency adjustment of $1.5 million per annum (totaling $7.5 million for AA6).

EMCa has not provided a bottom-up basis for its estimated offsetting efficiency of $1.5 million per annum, but relates this efficiency to "the significant spend in IT expenditure in AA5"[17], citing "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."[18]

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 may be able to achieve. With our offsetting efficiency adjustment of $0.6 million p.a. (totalling $3.0 million over AA6), we consider a net opex step change of $5.3 million to be prudent and reasonable, and reflect our best estimate at this point in time.

Table 2.12: Proposed opex step change for IT applications during AA6, $'000 real at December 31 2024

	2026	2027	2028	2029	2030	Total AA6
Opex step change	1,517	1,889	1,625	1,625	1,625	8,281
Opex efficiency	(600)	(600)	(600)	(600)	(600)	(3,000)
Net step change	**917**	**1,289**	**1,025**	**1,025**	**1,025**	**5,281**

Specifically, 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,

[16] Paragraph 74, Draft decision on revisions to the access arrangement for the Dampier to Bunbury Natural Gas Pipeline (2026 to 2030) Attachment 5: Operating expenditure, ERA, 7 July 2025.
[17] Ibid.
[18] Ibid.

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).

We address each of these in the subsections below.

1.2.4.1 OneERP

As already covered in the AA6 submission, the OneERP development replaced DBP's end of life financial management system with an industry standard enterprise resource planning system delivering more robust, standardised processes and controls for accounts payable, procurement and supply chain management. While it has brought about efficiencies in some processes, it has also introduced additional rigour in others. As OneERP went live in 2023, process efficiencies from its introduction are already embedded in our opex base year.

We are, however, continuing to invest in incremental functionality for OneERP. As discussed at section 2.2.3.2 above, the SAP S/4 and Maximo incremental functionality program allows us to deliver on business required system changes related to:

- Data accuracy and consistency
- Policy and regulatory alignment
- Process streamlining
- System stability and reliability
- User experience improvement
- Incident fix

Using estimated benefits (i.e. based on our Enhancement Calculation Matrix depicted in Figure 2.7) for deployed 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, $359,500 of 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 functionality, we consider a realistic value for ongoing opex efficiencies associated with the OneERP investment is $600,000 per annum.

1.2.4.2 TBS

TBS is a new modern billing system to replace the end of life CRS. It provides a more flexible and robust billing platform, with a modern user interface for DBNGP customers. It will also remove the current use of manual workarounds.

As already covered in the AA6 submission, we could not continue with CRS as:

- [redacted]

[redacted]

We expect to be absorbing an estimated $0.3 million per annum in opex over AA6 associated with subscription and support costs for the new customer portal connected to TBS. While there is still some work to do to lock in this new annual recurrent cost, we have not included it in our opex step change, as we will look to offset it with efficiencies/cost avoidance in our billing and commercial operations activities over AA6.

1.2.4.3 Human Capital Management (HCM)

We are expanding functionality in SuccessFactors to deliver integrated, consistent and efficient capabilities across the moments that matter most in the employee lifecycle, including learning, performance and goals, employee central, employee central payroll, recruiting, onboarding, compensation, succession and development.

A tightening labour market highlighted the deficiencies in our previously manual recruitment, onboarding, offboarding, compensation, succession and development processes and capabilities. This is especially evident in the resource driven market of WA, where DBP has to compete against larger market players who can dominate the market unless we optimise our people-centric approach.

Implementing a one-HCM integrated solution will play a critical role in facilitating significantly improved communication between the People and Culture team, people leaders and managers, current employees and prospective candidates, as well as contractors.

Key benefits include:

- Enhanced user experience for the workforce throughout the employee lifecycle
- Centralised workforce data management
- Time and effort efficiencies for workforce
- Enhanced data accuracy and reporting
- Streamlined and more automated human resources processes
- Improved communication and collaboration
- Compliance, security and risk mitigation
- Ability to integrate with AGIG operating systems more efficiently
- Readiness and greater scalability for growth of AGIG workforce

These benefits have been defined as being intangible benefits.

We delivered a new learning management system with SuccessFactors in 2023, with implementation costs shared across AGIG based on FTE. Given readiness and greater scalability for growth of AGIG workforce is driven by the AGIG AGN distribution businesses, DBP has not contributed to the initial implementation costs of the remaining SuccessFactors modules which will be delivered in September 2025.

Time and effort efficiencies for our staff are not expected to deliver a quantifiable annual opex saving. Rather, they reduce time and effort on low value administrative tasks (such as entering and approving leave requests, updating personal information, maintaining goals and

development plans), small time savings across all employees. This then frees up time for higher value-adding activities.

Likewise, streamlined and more automated human resources processes, will reduce time and effort spent on administrative tasks within recruitment, onboarding and maintaining employee information, but it does not change the need for these tasks (i.e. authorisation to recruit, advertising, shortlisting candidates, phone screening, face to face interviews, pre-employment checks etc. all still need to be completed). The small time savings across all these tasks will, however, free up that time to be spent on higher value-adding activities such as succession and workforce planning. It will also improve the experience for our staff and potential candidates.

1.2.4.4 Maximo Business Process Redesign and Asset Data Integrity Improvement Program

The Maximo Business Process Redesign and Asset Data Integrity Improvement Program supports continuous improvement in asset management and is integral to continued delivery against our Safety Case. Specifically, the work program completed in AA5 was undertaken to fix limitations of asset structures configured in Maximo, originally deployed to support maintenance execution, to ensure asset definitions and structures properly reflected our assets in a way that is also usable for, and reflects, our asset management activities.

The work included:

- Asset and location hierarchy rebuild from site drawings
- Safety Critical Element (SCE) tracking functionality – Required by updated licence conditions. We continue to build out the master data for SCEs, from PDF work instructions, having completed 20,000 out of 82,000 locations to date
- Maintenance prescription application – Systemising maintenance strategies in a standardised way by functional system and equipment type, where these were previously kept in PDF document of varying formats creating ambiguity and misalignment between field execution and the asset strategy
- Systemising the management of change process from a previously manual PDF form, email and Excel based tracking register following multiple errors found and MOCs missing – The new systemised process has automated the form and register, associated workflows and reporting
- Implementing Maximo investigation module – This allows for tracking and backlog visibility of active equipment failure investigations, which were not previously centralised or logged

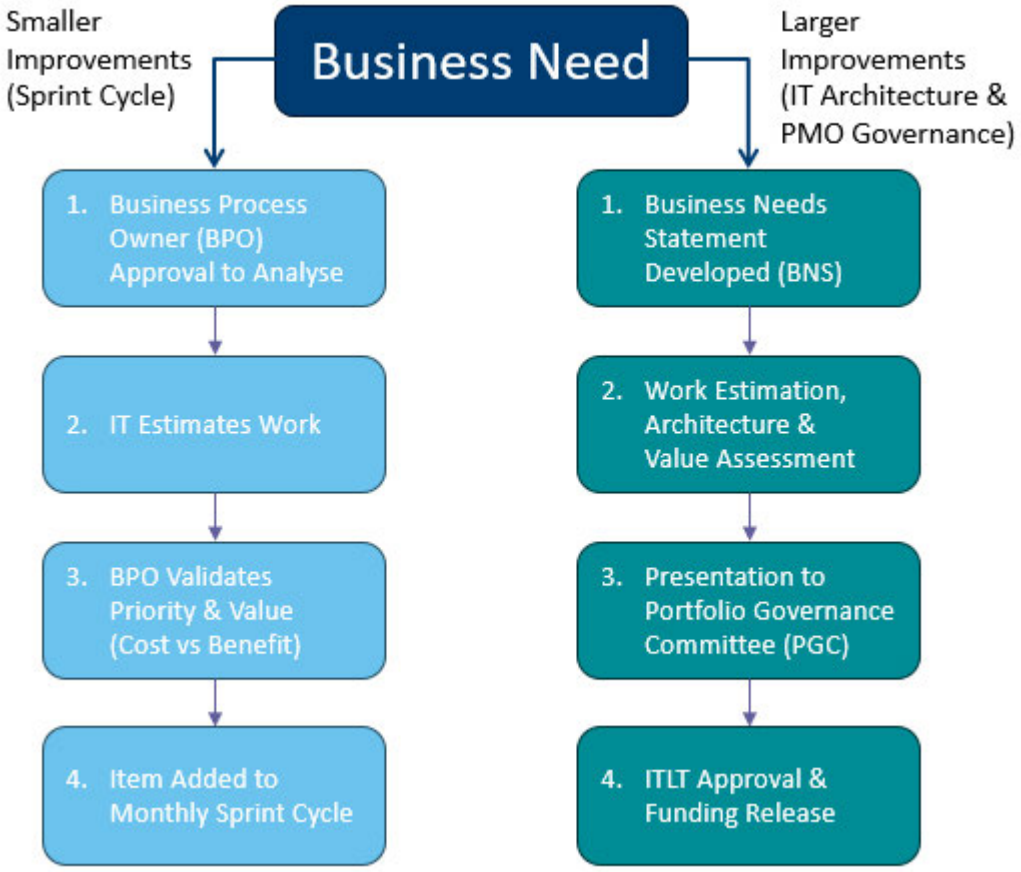
All of these items drive improvement in our Asset Management maturity, increasing visibility and centralising (and in some cases, documenting) business knowledge. They do not drive ongoing opex savings.

Appendix A Improvement management process

AGIG employs a dual-path improvement management process.

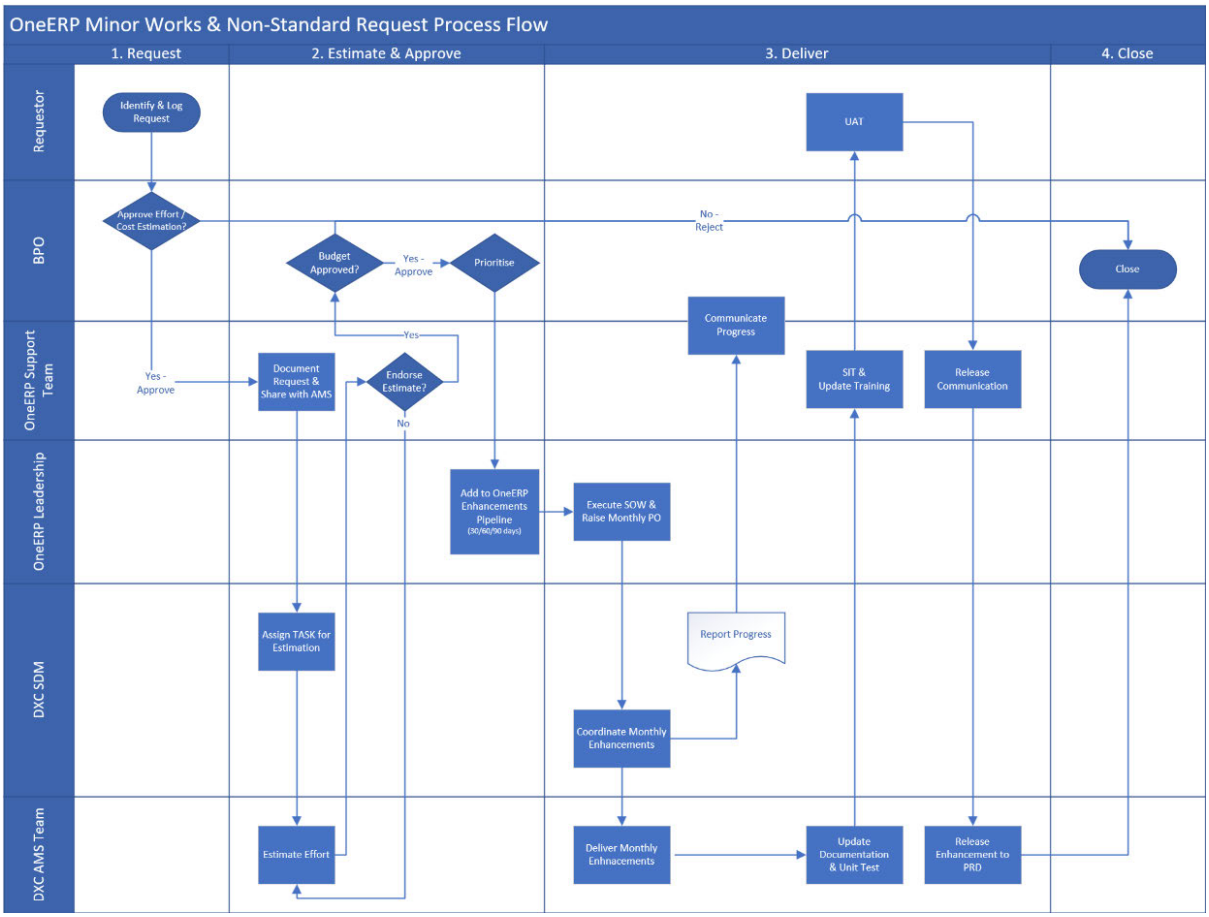
- Smaller items are via the AGIG Business Process Owner approval and monthly sprints, focusing on rapid delivery of business needs
- Larger, strategic implementations & improvements undergo IT PMO governance, requiring a Business Needs Statement and ITLT approval for funding

This ensures both agility and strategic alignment, prioritising improvements with clear business value, and is outlined in the following diagram.



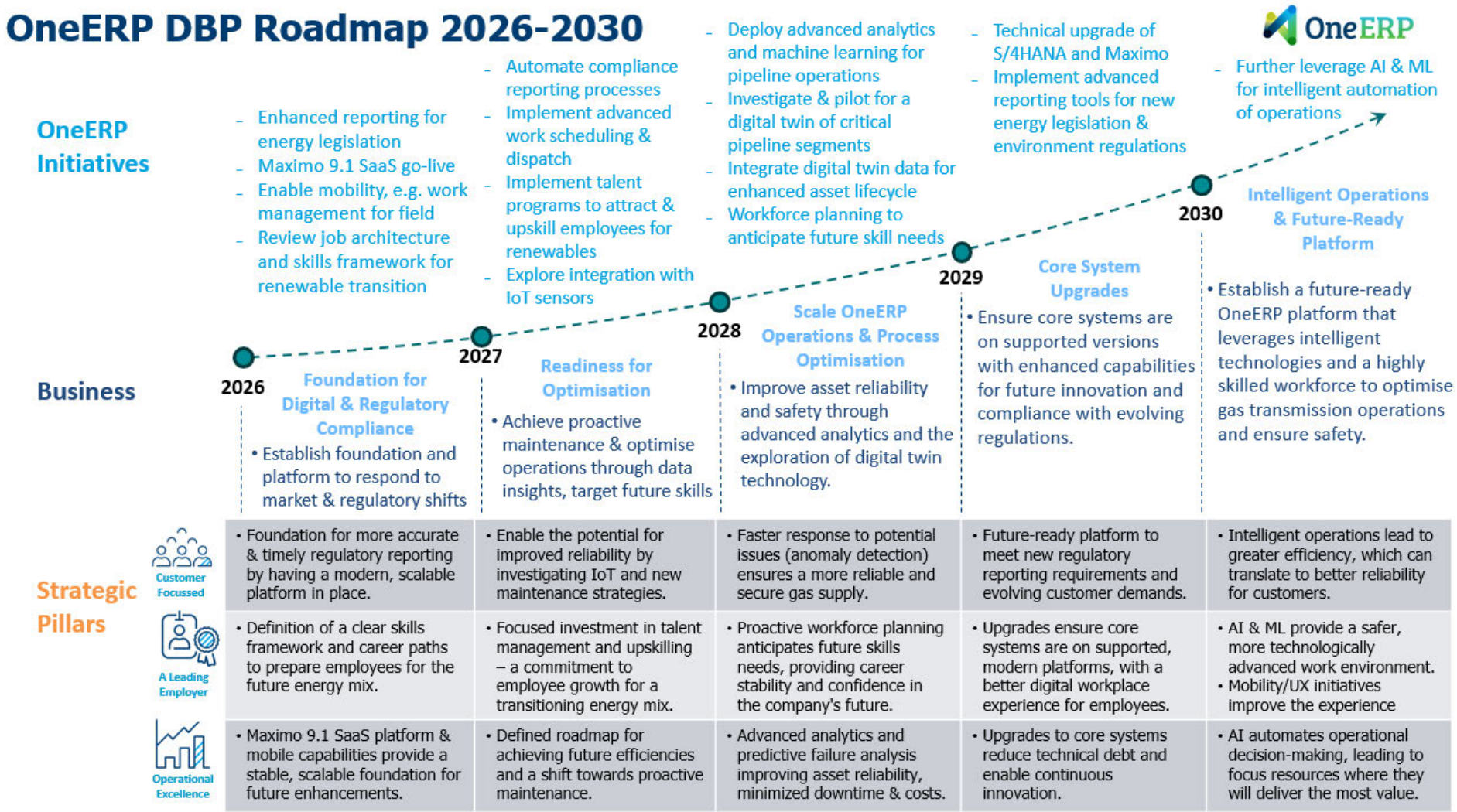
Note: AGIG is investing in the development of SAP internal expertise to reduce reliance on external vendors to deliver minor improvements and manage increasing costs from vendors.

The following process flow provides further detail on the robust, multi-stage enhancement workflow that ensures every request is vetted, estimated, and subject to a formal CBA.


OneERP Minor Works & Non-Standard Request Process Flow
1. Request
2. Estimate & Approve
3. Deliver
4. Close
Requestor
BPO
OneERP Support Team
OneERP Leadership
DXC SDM
DXC AMS Team
Identify & Log Request
Approve Effort / Cost Estimation?
Yes - Approve
Budget Approved?
Yes - Approve
Prioritise
Yes
Document Request & Share with AMS
Endorse Estimate?
No
Add to OneERP Enhancements Pipeline (30/60/90 days)
Assign TASK for Estimation
Estimate Effort
Execute SOW & Raise Monthly PO
Coordinate Monthly Enhancements
Deliver Monthly Enhnacements
Report Progress
Communicate Progress
UAT
No - Reject
SIT & Update Training
Update Documentation & Unit Test
Release Communication
Release Enhancement to PRD
Close

Appendix B OneERP DBP enhancements program

B.1 Roadmap



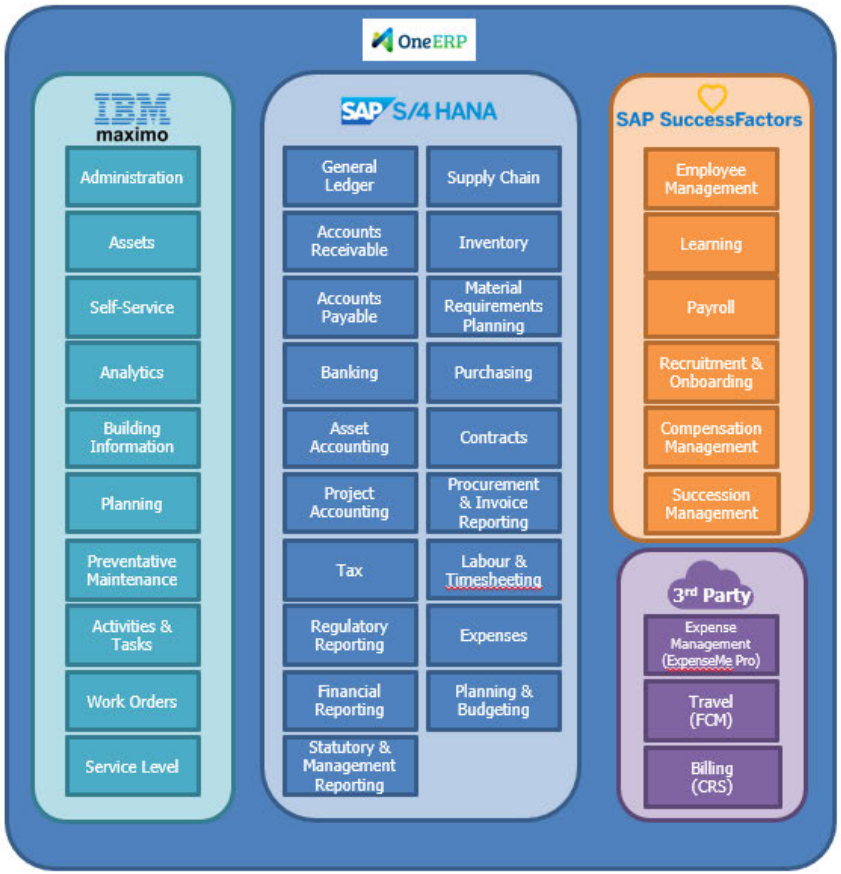
B.2 OneERP Overview

OneERP Overview

OneERP is an integrated hybrid solution centred around SAP S/4HANA supporting DPB & AGN Corporate in the areas of Finance, Procurement, Supply Chain Management, Asset Management & Human Resources & Payroll.

The business needs speed and agility, continuity and no disruption whilst adopting innovation and new or improved processes. OneERP continuous improvement (enhancements) is essential to ensure the solution remains effective, efficient, and aligned with the business needs over time.

Continuous improvement complements support operations by addressing new business requirements, enhancing customer (user) satisfaction, and ensuring OneERP investments continue to deliver value to the organisation.



B.3 AGIG OneERP Support & Continuous Improvement

AGIG OneERP Support & Continuous Improvement (i.e. Enhancements)

OneERP Operational Support

The purpose of this task is to safely and efficiently ensure business continuity and the operability of the solution.

The most important aspects to consider:

- Monitoring & Alerting
- Problem Management
- Access Requests
- Change Management
- Application Operations
- Software Currency
- Performance & Tuning

OneERP Continuous Improvement

In addition, the OneERP support organisation should seek for continuous improvement.

The most important aspects to consider:

- Measure ongoing business value
- Analyse business requirements/requests
- Planning & design of request fulfillment
- Solutioning with DXC
- Testing support
- Release communication
- Training & enablement

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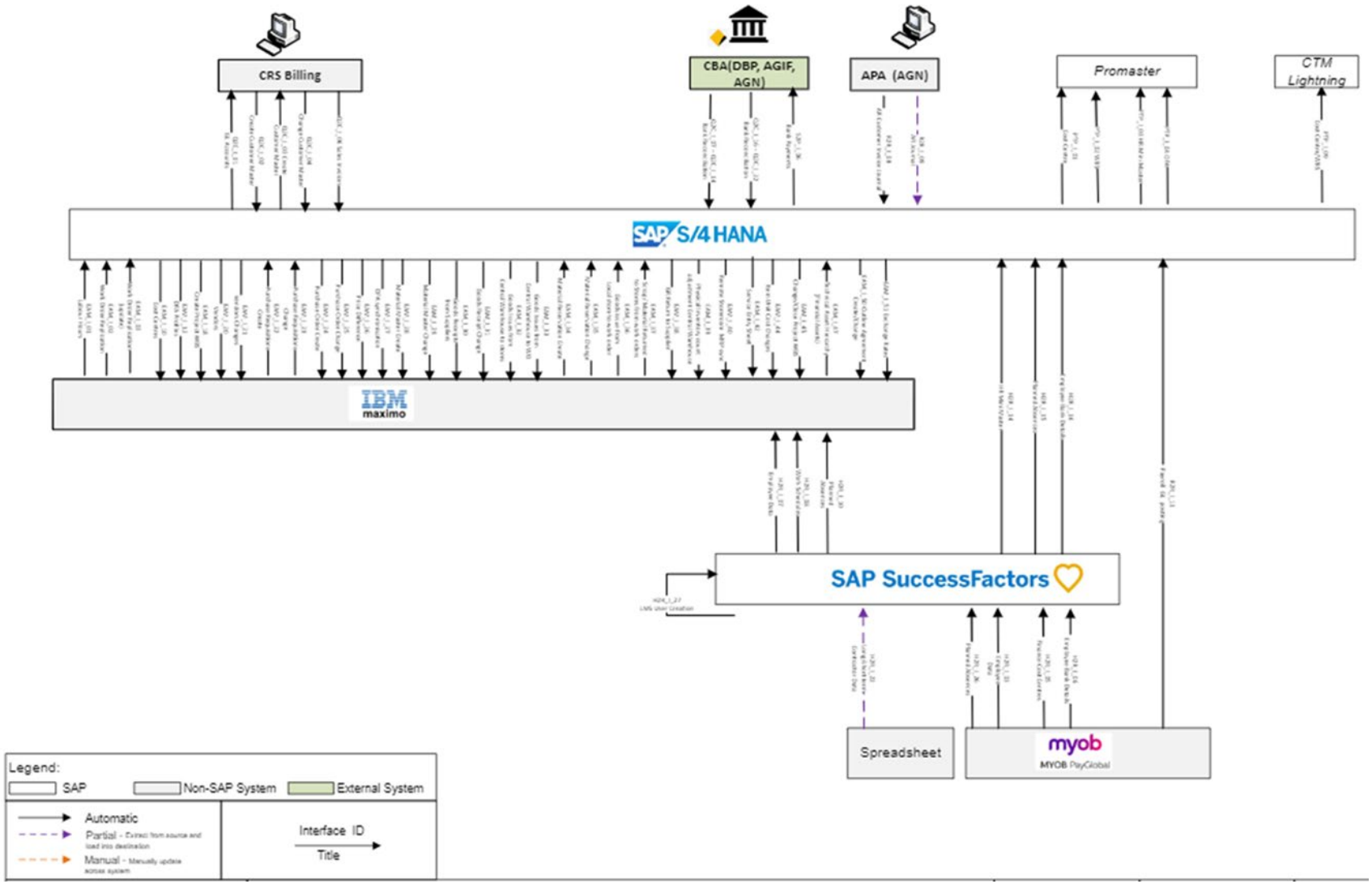
B.4 OneERP architecture



B.5 Maximo incremental functionality enhancement opportunities AA6

Enhancement	Detail	Benefit of enhancement	2026 ($000)	2027 ($000)	2028 ($000)	2029 ($000)	2030 ($000)
Safety Critical Equipment (SCE)	The capability of the CMMS needs to be enhanced to enable the identification of safety critical equipment (as a subcomponent of the SCE), the identification of performance testing of safety critical equipment, and the reporting of the success / failure of this testing.	Removes noncompliance to pipeline license conditions	120	10	10	10	10
Pipeline Integrity & Supply Authorisation (PISA)	Include the generation and tracking of Pipeline Integrity and Supply Authorisations (PISAs). The PISA is an integral part of the Permit to Work system. Currently the system is paper based on the desk of the pipeline controllers.	Enables alarm data analysis Currently alarm data is swamped with alarms generated during maintenance activities, this enhancement enables filtering out these alarms	25	0	0	0	0
Mandatory Failure Reporting	Equipment failure reporting is captured in a free text manner within Maximo. This means that data is not readily associated with the asset register and trend analysis is a manual process. This proposal is to ensure that all equipment failures are aligned with the Maximo asset. This will require an update to the work order application and change to work practices.	Currently we manually read each work order for main equipment Failure records for non-main equipment aren't read Fundamental gap in asset management process would be resolved	60	40	40	40	40
Equipment level Scope of works (line of site on critical works)	Reporting on compliance to plan is required to ensure the asset strategies are being executed. Currently this is completed utilising a manual snapshot gap analysis. This proposal is to re-work the job plan and work order systems such that the scope of works and work records can be readily aligned with MPID strategies. This means the compliance to plan can be observed using an automated report rather than an expensive manual snapshot methodology.	This allows for real time compliance to plan checks, currently a complete snapshot gap analysis would cost ~$1M in internal labour This will enable a mobility solution by converting scope data to a digitised Maximo object (currently a PDF work instruction)	40	120	120	120	120
Critical Spares	We have a revised definition of spares such that maintenance spares are now treated differently to critical (emergency) spares. Maximo has the functionality to manage this differentiation, but the master data need to be upgraded to reflect what we currently own.	Tracking of critical spares on a site-by-site basis is required to manage inherent risk of supply This will ensure our stock levels are optimised for the risk level	0	75	0	0	0

Enhancement	Detail	Benefit of enhancement	2026 ($000)	2027 ($000)	2028 ($000)	2029 ($000)	2030 ($000)
Engineering Management of Change (MOC)	The management of change application is relatively mature but requires ongoing enhancements to meet the work execution and governance requirements. The next phase involves upgrading the application to more clearly define the change scope and cost.	Automated analytics on the change management program de-risks the program	15	0	0	0	0
Maximo Change Control (MCC)	The current Maximo application (MCC) has limited workflow and almost all free text meaning it does not leverage Maximo objects for analytics. This means that a change cannot be traced to the request and justification.	Unmanaged change has caused gaps in our asset management program This is a gap that needs to be filled to mitigate risk	50	0	0	0	0
Operational Readiness Checklist	Operational readiness is a project phase that is currently managed via a spreadsheet and regular meetings. Based upon the success of the MOC program, we have a justification to utilise Maximo as the work management tool. This will enable streamlined workflows and automated reporting. This is a governance improvement initiative.	Improved governance and optimised execution of the operational readiness business process is required to centralise the currently distributed workload associated with change management and SIB implementation	25	25	0	0	0
Investigation Module	The investigation module is native to Maximo but has too many parameters and no defined workflow. This scope of work would develop the workflow and remove the non-relevant parameters.	Avoided cost	15	0	0	0	0
Plant Operating Instructions (POIs)	Plant operating instructions are utilised where temporary scenarios are employed to ensure safe and optimised operations occur. The management of these POIs is currently via the engineering document control system which does not provide a current summary of status, expiration data, location etc.	Risk Reduction and obligation visibility	0	30	0	0	0
Equipment Criticality Analysis	Each equipment type has a criticality rating. This rating depends on the failure type and operating context. This information needs to live within Maximo to ensure it can be linked to work orders	Compliance to plan and optimised spend through objective work management prioritisation	35	0	0	0	0

Enhancement	Detail	Benefit of enhancement	2026 ($000)	2027 ($000)	2028 ($000)	2029 ($000)	2030 ($000)
Master data standard	The way Maximo objects are built can make a large difference to the quality and availability of data for asset management analysis. Specifically, the rules which govern how DBP assemble these Maximo objects need to be defined and enforced. Preventative Maintenance objects, Job Plan objects, and the entire asset register need rules that define their construction. Then these rules need to be implemented.	Risk mitigation through data consistency, efficiency gains through consistent build logic	0	25	25	25	25
Test equipment traceability	Test equipment calibration (example: pressure and temperature references) and NDT testing records (example: lifting equipment) are not currently loaded to Maximo. this means there is no universal access to these certificates. The current method is quite impractical and often the certificate is only found to be expired when the team is assembled at the work face. Visibility of these documents needs to be integrated, via Maximo, into the planning process to minimise disruption to planned works.	Remove Non-compliance and improve execution efficiency	25	0	0	0	0
Total			**410**	**325**	**195**	**195**	**195**

Appendix C System Enhancements Opportunities List

ID	Opportunity Name	Description	Requesting Departm	MoSCoW	Risk Rating	Urgency	Impact	Priority	ROM ($000)	DBP Allocation
1	Enable Mobility across GIS suite	Turn on and configure GIS Mobility across X-Info Lands, Encroachments and BYDA for Field Mobility devices	Land Management	Should Have	Low	Medium	Site	P2	120	100% direct DBP
2	Workflow integration GIS to Streamline Section 41 Notifications	The DBNGP is located in an infrastructure corridor owned by the State Government of WA through the DBNGP Land Access Minister and it is managed by the Department of Planning, Lands and Heritage's Infrastructure Corridor Branch. Property owners, pipeline operators and third parties that wish to carry out activities or works within this corridor need to seek the Minister's approval under Section 41 of the Dampier to Bunbury Pipeline Act 1997. To support safer infrastructure development and improve compliance to Section 41 Notifications we are looking to streamline the process through Integration of BYDA and Pipeline Operator Third Party Works Systems (TPW). This ensures all excavation or development notifications near critical infrastructure are tracked, responded to, and resolved efficiently reducing delays, regulatory risk, and safety incidents.	Land Management	Should Have	Low	Medium	Site	P2	140	100% direct DBP
4	Data Analytics and Visualisation - Core use cases	For core use cases, such as Asset inspection data, financial and gas throughput/flow data, transmission operations and transmission asset management key performance indicators •Predictive Analytics for On-prem and cloud based Applications, including IT-OT Augmented reports for better decision making. a. Continuous Agile delivery of data & analytics requests from Business users - BAU or projects b. Establish capture of Metadata, data lineage and data dictionary c. Design Master data management system for critical data entities and attributes d. Modify and augment reports for the likes of Maximo, SAP Rise, GTreasury and other relevant systems. To support the above, •Augment Enterprise Data model with peripheral systems and supercharge Data quality framework with all critical data sets •Mature the data & information management practices by implementing data	All Business Areas	Should Have	Intermediate	Medium	Site	P2	855	100% direct DBP
8	Replace Investor Portal	The Investor Portal supports Investor Relations functions for AGIG and all of its businesses, including DBP. It provides a web portal where current and prospective investors can interact with key business information and documentation relative to their investment including ESG reports, rating agency reports, investor roadshow packs, etc. The current solution is a custom build .NET application built in 2018. It can no longer be maintained long term, with further code deprecation due 31/10/25 (SQL APIs), following remediation in June 2025 of the deprecated Azure Graph API. During this work a number of other issues were identified with old code that can no longer be supported. As further deprecations occur, we expect ~10-15k required for each, with the application becoming increasingly unstable as these issues are 'patched' up (e.g. increased workarounds to make older code work with newer code). Without a working Investor Portal, the Treasury team would have to go back to manual email interactions with ~200 investor stakeholders, increasing their time and effort, introducing increased security risk for sensitive business information and reflecting poorly on AGIG and DBP's reputation - all of which could impact the competitiveness of AGIG and DBP's debt costs. This work will deliver a	Treasury	Should Have	Intermediate	Medium	Organisation	P2	109	35% AGIG wide (Revenue)
12	Contract Management System - Shipper Contracts	The Dampier to Bunbury Natural Gas Pipeline (DBNGP) has been operating for 41 years and is set to continue for another 30 years. We currently manage contracts with 65 Shippers/Customers. These contracts are not only high-value (around $500 million annually), but also highly complex, with 95% being regulated. Some agreements are structured as a parent contract with multiple linked child contracts. Others involve 2 to 10 separate contracts with the same shipper, each serving different purposes—such as transport or inlet services. Managing these requires extensive documentation and administrative effort, making the process heavily person-dependent and prone to errors, especially when identifying and executing the correct contract version, with an incident of an incorrect contract version being executed in recent years resulting in additional work and costs for both DBP and the contracting party. Implementation of a Contract Management System to systemise the management of these contracts would provide the rigour and consistency required to reduce these risks, and improve the experience for both DBP and its customers in managing and varying existing contracts as well as executing new contracts. Further, systemisation enhances auditability, improves access control (ensuring only authorised users have access based on their roles), and supports better governance. A system-based Contract Management Solution (CMS) also aligns with our sustainability goals by enabling more efficient operations, reducing waste, and supporting data-driven decision-making.	Commercial Operations/Legal	Should Have	Low	Low	Organisation	P2	860	100% direct DBP