Revised Final Plan
Attachment 9.12

Structures and Operational Sites

August 2025

PUBLIC

Dampier Bunbury Pipeline

1 Structures and Operational Sites

1.1 The ERA's position

The structures and operational sites business case is a new grouping of activities that have been removed from multiple areas across other business cases and consolidated into one portfolio. This change reflects the growing need for asset management in our facilities as they age.

EMCa and the ERA accepted all DBP's AA5 expenditure on structures and operational sites as conforming capex. For the AA6 period, while the ERA and EMCa appear to agree in principle the need for each of these projects, they have made a number of material exclusions, summarised below:

- **Karratha depot northern hub** – costs have been excluded on the basis EMCa and the ERA consider it unlikely DBP would have sufficient time to scope, design and procure the land within one year in 2030, and so these costs would more likely be incurred in AA7
- **40% reduction across the compression asset class projects due to 'speculative projects'** – the ERA and EMCa has applied a broad brush 40% cut for all projects in the compression asset class. The reduction appears to be on the basis EMCa considers there is insufficient maturity in the scope and scale in some of these projects. In particular, EMCa highlights there is insufficient justification for the following three projects
  - Site building conversion
  - Helicopter landing pads
  - Oil farms
- **Working at heights** – EMCa considers the proposed works to address risks associated with working at heights is a generalised allowance. While accepting some works will likely be needed, EMCa has applied the arbitrary 40% cut, plus a further 10% cut due to rounding in the forecast (discussed below).
- **10% reduction for 'highly rounded' unit rates –** EMCa considers it likely that there was a tendency to round up the unit costs applied in developing DBP's AA6 forecast and proposes an across the board 10% reduction in DBP's allowance for the compression asset class to account for this.

These matters are discussed in our response below.

1.2 DBP's response to the Draft Decision

We accept in principle the proposed deferral of costs associated with the Karratha depot, however we propose an alternative estimate that will allow us to scope and design the depot but not purchase the land until AA7.

While we are unclear on the rationale for the 40% reduction and how the 40% value was arrived at, we will accept the reduction to the compression asset class, noting that we will seek to undertake these works during the period within the overall allowance.

We provide more information on the 2023 audit underpinning the working at heights program and maintain that this program should remain at the original forecast level.

We do not accept the broad brush reduction of 10% based on highly rounded unit rates. We submit that our estimate meets the requirements of NGR 74 and that a rounded rate does not render forecast capex non-conforming, particularly where the need for the expenditure has been justified under NGR 79(2). While there may be a degree of rounding in the forecasts, it is unreasonable to assume all estimates are rounded up (rounding down also applies). Given only actual capex incurred is recovered via regulated revenue, there is little value in making an arbitrary rounding reduction to what is ultimately a five-year forecast subject to considerable error, particularly in the outer years.

A detailed discussion of the ERA and EMCa's commentary on these projects, along with our response on each, is provided in the following sections.

1.3 Karratha depot

1.3.1 The ERA's position

DBP's proposal included a forecast of $2.0 million in 2030 for the scoping, design and procurement of land to re-establish a depot in Karratha to service the northern areas of the pipeline.

The ERA excluded the project on the following basis:

> *EMCa noted that while DBP makes a reasonable circumstantial case for creating a Northern Depot at Karratha, DBP undermines the timeliness of this by proposing only to conduct investigations with a view to purchasing a site with expenditure proposed for 2030. In addition, DBP's business case refers only to purchasing a site at this time and so does not appear to deliver a working depot in the AA6 period. EMCa considers that DBP has not adequately justified inclusion of this capital expenditure allowance for the Northern Depot and the $2.0 million proposed is not conforming capital expenditure.*
>
> *The ERA has reviewed the Northern Depot at Karratha project and from the information provided, considers, as did EMCa, that DBP has provided a case for the project. However, the information provided is still very preliminary with only desktop research being undertaken on the possible cost of a property. DBP notes it will conduct a more detailed analysis as part of the project before committing to a property investment. The ERA considers that based on the current information that the proposed capital expenditure does not meet the criteria to be considered prudent and efficient.* [1]

1.3.2 DBP's response

It appears the ERA and EMCa agree that establishing a working northern depot is prudent but excludes the cost of the depot design and purchase of the land on the basis the project will not deliver a working depot in the AA6 period.

We disagree that the completion of a project by the end of an AA period is required for a forecast to be considered conforming. There is no requirement under the NGR for projects to be complete within one period. As such, the timeframe over which a project or program is completed is only relevant to the extent it affects either the prudence or efficiency of the project.

[1] Paragraph 396 and 397, 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, July 2025.

We do not design our works program solely to fit into AA periods. We design a deliverable, balanced program of work prioritised by risk. This means that there are often costs associated with projects or programs that will not necessarily be completed by the end of an AA period, particularly those which commence close to the end of a period.[2] We do not consider this makes the capex forecast non-conforming.

If the ERA adopts the view that to be conforming capex, a project must be started and finished within an arbitrary five-year period, regulated businesses would be incentivised to front-load works programs. This in itself would be inconsistent with the NGR as it would likely be less cost efficient and might result in prudent works being deferred due to artificial time bounds set by an administrative process.

The northern depot project is scheduled towards the end of the AA6 period simply to accommodate other, higher priority structures projects, such as the redevelopment of the Jandakot facility and the compressor site accommodation program. We considered bringing the northern depot project forward, however, our view at this time is that current competition for construction resources both within DBP and more broadly in the Karratha area, would result increase the overall cost of the project. On this basis we included only the costs associated with scoping, depot design and the purchase of land in the AA6 period. Construction will follow soon after.

In light of the ERA's Draft Decision, we have considered whether we could shift costs without materially impacting the timing of depot construction. We believe we could defer the purchase of the land until AA7 without much delay in the delivery of the northern depot. However, we would still need to undertake the scoping, design and site investigation and selection during the AA6 period. This would allow us to have developed a well-informed cost estimate ahead of AA7.

On this basis we have reduced our forecast for the Karratha northern depot by $1.45 million to $0.58 million. This forecast includes costs relating to:

- Preliminary design and architectural planning
- Workforce engagement
- Site surveying
- Detailed construction planning
- Market testing and procurement

We have developed this forecast based on recent architectural service fees, conceptual drawing and development application costs incurred by DBP.

It should be highlighted that the identification of a suitable site in Karratha could be a lengthy process. As the ERA and EMCa would be aware, the commercial property market in the Pilbara region is tight. Currently there are no suitable properties that we could use, and no land we could develop in the area. As such, should a suitable property become available in the AA6 period, we will look to purchase it ahead of the commencement of the AA7 period. We consider this would meet the requirements of the NGR such that, albeit we may not have operationalised the depot, it would be a prudent investment based on market rates.

[2] A notable example of this is our works to install remote isolation valve actuators at the Ngangetty Road meter station. This project started in 2015/16 (the start of AA4) and was not completed until 2022 (half-way through the AA5 period).

1.4 40% reduction for speculative projects

1.4.1 The ERA's position

The ERA has reduced our compressor asset class expenditure on structures and operational sites by 40%. EMCa states:

Much of the proposed work is speculative and not supported by adequate justification

> *From our review of this business case, we consider that the three projects listed below are at a speculative stage for which there is insufficient justification of need or for expenditure at the proposed level. These are:*
>
> *• $1.5m for site building conversion*
>
> *• $0.6m for helicopter landing pads*
>
> *• $0.4m for oil farms.*
>
> *DBP also proposes a project to address 'working at heights' issues, with a proposed allowance of $2.3m. While there is reasonable evidence of a need to address issues, this appears to be a generalised allowance that we expect will be reduced once needs are considered at a site-specific level.*

In aggregate, DBP will require less than it has proposed

> *While some of the work in this business case is likely to be needed, on balance we consider that DBP is more likely to require around 40% ($3.2m) less for this category than the $7.96m it has proposed, as well as allowing for a unit cost reduction (as described below).*[3]

1.4.2 Our response

The AA6 program of structures and operational sites work at compressor stations is based on our currently identified needs. The five-year ahead view of the regulatory process means the forecast inevitably includes some projects and programs that are less well defined than others and does not include urgent projects that emerge during the period.

The Draft Decision indicates that the ERA and EMCa agree that the types of structures and sites work DBP has proposed needs to be done but question the magnitude of the program. The ERA has adopted EMCa's proposed reduction of 40% despite the size of the cut being unsupported by any detailed analysis in EMCa's report, which merely states that "[i]n aggregate, DBP will require less than it has proposed".

In most instances, it is unclear whether EMCa is questioning the need for whole programs, or whether it is questioning DBP's capacity to deliver the proposed volume of work overall. We address these concerns below.

1.4.2.1 Most programs are designed to address existing health, safety and environmental issues

We maintain that the work as scoped in our proposal is required to be completed over the next AA period. With the exception of the building conversion program, the works address identified health, safety and environmental risks. Investment in the safety of our staff and the

[3] Paragraph 299-301, Review of Proposed DBNGP Access Arrangement (AA6) 2026 – 2030, EMCa, June 2025.

public is not negotiable. In line with our business values, legislative obligations and risk tolerance, we must complete this work in the AA6 period.

1.4.2.2 We developed the structures and operational sites business case as an overall program to ensure it is deliverable

We included all structures and operational sites in the one business case so that we could consider the scope of work and deliverability of the whole program. We maintain the program is not only is required to be completed but it is also deliverable over the AA6 period.

We disagree with EMCa that a less defined scope of work makes forecast capex non-conforming. The need for the projects has been identified, the costs are based on market assumptions and historical projects, and the forecast has been arrived at on a reasonable basis. We maintain the program of work, including those projects relating to compression assets, meet the requirements of NGR 79(1), 79(2) and 74.

1.4.2.3 It is unclear how the magnitude of the reduction was derived

Neither EMCa nor the ERA have provided information about the process or analysis used to determine that an alternative forecast 40% lower than our proposal is reasonable. EMCa has reviewed three discrete projects (site building conversion, helicopter landing pads and oil farms), each relatively small in the scheme of the works program and concluded they were speculative in nature. It appears EMCa has applied a 40% reduction to these three projects and then applied the same arbitrary reduction to the whole compression asset class.

While we are unclear on how the 40% reduction was arrived at, we will accommodate this reduction to the compression asset class in our AA6 capex forecast, **with the exception of the working at heights project**, which we maintain is required in full as per our original proposal.

We also reject the ERA's broad brush application of a further 10% reduction based on rounded unit rates. These matters are discussed in the following sections.

1.5 Working at heights

1.5.1 The ERA's position

The ERA excluded $1.14 million of forecast costs associated with our working at heights program of work. In its draft decision the ERA noted:

> *In addition, EMCa notes that while there is reasonable evidence of a need to address working at heights issues, DBP's proposed allowance of $2.3 million appears to be a generalised allowance that it expects will be reduced once needs are considered at a site-specific level.*[4]
>
> *The ERA has reviewed the structures and operational sites proposed expenditure. The ERA also considers a number of projects are speculative with insufficient justification. Also, the working at heights proposed expenditure is high-level, and overly generalised. The ERA considers these factors result in a level of proposed expenditure that is not prudent and efficient.*[5]

[4] Paragraph 145, 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, July 2025.
[5] Paragraph 147, ibid.

EMCa suggested a reduction of 50% to account for the generalisation of the program of work resulting in an over-forecast estimate, and overly rounded unit rates (discussed in the following section) should apply to the working at heights. EMCa states:

> *DBP also proposes a project to address 'working at heights' issues, with a proposed allowance of $2.3m. While there is reasonable evidence of a need to address issues, this appears to be a generalised allowance that we expect will be reduced once needs are considered at a site-specific level.*
>
> *In aggregate, DBP will require less than it has proposed*
>
> *While some of the work in this business case is likely to be needed, on balance we consider that DBP is more likely to require around 40% ($3.2m) less for this category than the $7.96m it has proposed, as well as allowing for a unit cost reduction (as described below).*[6]

1.5.2 Our response

As highlighted in our business case, the working at heights program was developed following an audit in 2023. EMCa and the ERA acknowledge the works are required but have suggested the scope may be able to be reduced once we assess the various needs at individual sites.

We can confirm we have already assessed the various needs at individual sites as part of the 2023 audit (Appendix B). The 2023 audit comprehensively documents the risks not only by site, but also individual asset, including:

- Site-specific risk assessments with detailed categorisation of hazards
- Photographic evidence supporting the identification and severity of risks
- Remediation strategies tailored to each site, enabling informed and targeted investment decisions

This level of detail directly addresses the ERA's concern regarding the generalisation of the program. It demonstrates that DBP has a clear understanding of the condition of its assets and the risks they pose and has developed a structured, risk-based and evidence-based approach to remediation.

In accordance with obligations under the *Workplace Health and Safety Act*, DBP must ensure that all identified risks are adequately addressed. Investment in the safety of our staff and the public is not negotiable. We must complete this work in the AA6 period.

We have already phased the program over several years by prioritising high-risk issues that pose immediate threats to safety and operational integrity. A reduction in the scope of work to the level required to meet the ERA's alternative forecast, is not prudent. Deferring a significant proportion of this safety-driven program would unnecessarily expose DBP, its employees and the public to unacceptable levels of risk.

As implicitly acknowledged by EMCa and the ERA in their acceptance of the AA5 costs as conforming capex, these safety-critical works are prudent and historically have been completed efficiently. EMCa states that it:

[6] Paragraph 300 and 301, Review of Proposed DBNGP Access Arrangement (AA6) 2026 – 2030, EMCa, June 2025

is reasonable for the operator to have commenced these works during AA5 and the costs appear reasonable.[7]

The AA6 forecast reflects the continuation of this program. Our AA6 forecast is based on actual site conditions and observed risk levels, and not theoretical assumptions. It was developed using actual costs incurred during AA5 and reflects a sustainable level of investment required to continue remediation efforts.

In summary, DBP submits that the $2.3 million for working at heights is reinstated in our AA6 forecast on the basis that:

- The program of work is necessary to enable us to keep our staff and the public safe, meet our obligations as an employer and is consistent with industry standards
- The original submission reflects a sustainable and responsible investment strategy
- The prioritisation of high-risk remediation is consistent with our legal obligations and prudent asset management and therefore reflects a prudent and efficient work program
- The 2023 audit findings provide the site-specific detail requested by the ERA to demonstrate the prudence of the program
- EMCa's assessment of the program supports the reasonableness of the program
- The forecast meets the requirements of NGR 74 as it is based on historical costs and reflects the best estimate for the next five years given the information available in the circumstances

1.6 10% reduction for highly rounded unit rates

1.6.1 The ERA's position

The ERA reduced AA6 forecast expenditure on structures and operational sites related to compression assets by 10% on the basis EMCa observed that many unit rates are highly rounded. EMCa's observation is as follows:

Unit costs

Unit costs for all compressor asset projects are not at the detailed level that we would expect for mature planned projects and result from a process that it is reasonable to assume involved a degree of rounding up

To the extent that DBP undertook similar projects in AA5, for the most part we observe unit costs for AA6 that are broadly consistent (in real terms). The exception is the project for turbine exhaust replacement, for which the average unit costs for the two replacements recorded in AA5 is $705,000, but the AA6 forecast shows an average of $1.43m per replacement.

We also observe that many unit rates are highly rounded. For example, all RO replacements are costed at $300,000, helicopter landing pads at $200,000 each and replacement of GC's at $200,000 each. While such estimates may not be inaccurate in aggregate, the rounded estimates are a further indication of the relatively low level of maturity of much of the project budget for compressor station work at this stage and

[7] Paragraph 146, Review of Proposed DBNGP Access Arrangement (AA6) 2026 – 2030, EMCa, June 2025.

> *suggest that for much of its program, DBP lacks hard evidence of projects costs that it can utilise in producing its forecasts.*
>
> *Overall, we consider it likely that there was a tendency to round up the unit costs applied in developing DBP's AA6 forecast, and we propose an across the board 10% reduction in DBP's allowance for this asset class, to account for this.*[8]

Based on this justification, the ERA has applied an arbitrary and highly rounded across-the-board reduction.

1.6.2 Our response

We are of the view that our capex forecast meets the requirements of NGR 74, and that the ERA's sweeping reduction of costs by an arbitrary 10% is unreasonable.

1.6.2.1 Our forecasting methodologies meet the requirements of NGR 74

Our forecasts have been developed using both quantitative and qualitative methods. Where we have historical information or quotes from third-party providers, we use this as the basis for our forecast. While history is the best indication of future costs, consideration of future expectations should also be factored in.

The adjustment of actual costs is common practice. This is reflected in the well-established forecasting method for opex. We take our revealed costs, make adjustments to the base year and add escalate those costs for external influences including inflation, labour and materials cost expectations, and efficiencies. These adjustments are often based on qualitative expert judgement.

Similarly to forecasting opex, when forecasting capex we use actuals and adjust them where required to ensure they align with our expectations for the future. This involves quantitative adjustments, for example to reflect prices from up-to-date contract negotiations, recent quotes and foreign exchange rates, or qualitative adjustments based on advice from subject matter experts.

How we have derived our unit rates for each program of regular works is outlined in the Cost Estimation Methodology provided as Attachment 8.7 in our initial proposal. This includes information on our contracting arrangements, current contracts, and unit rates forecast in AA6 compared to those seen in AA5. EMCa appears to consider these unit rates to be reasonable, stating:

> *To the extent that DBP undertook similar projects in AA5, for the most part we observe unit costs for AA6 that are broadly consistent (in real terms).*[9]

If the costs for similar projects undertaken in AA5 are deemed to be conforming it is unclear as to why the AA6 forecast costs are deemed non-conforming.

We maintain that both these methods of adjusting our historical costs produce forecasts that meet the requirements of NGR 74 and have demonstrated that in our initial proposal. They both result in estimates that have been arrived at on a reasonable basis and represent the best forecast or estimate possible in the circumstances. The fact that some unit rates may be rounded up or down has limited relevance, particularly given only actual capital expenditure will be recovered.

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[8] Paragraphs 302-304, Review of Proposed DBNGP Access Arrangement (AA6) 2026 – 2030, EMCa, June 2025

[9] Paragraph 302, ibid.

1.6.2.2 A broad brush reduction of 10% is unfounded and unreasonable

At the end of the AA6 period, we will only roll the amount actually spent on these projects into the regulated asset base (RAB). The wording of the requirement of NGR 74 reflects this, referring to the *best forecast or estimate possible in the circumstances*.

Neither EMCa nor the ERA has provided any analysis or justification in support of their assumption of a systemic over estimation in our unit rates, or how they arrived at a 10% cut. Rather, EMCa seems to have based its recommendation on its assumption there is a *tendency to round up the unit costs applied in developing DBP's AA6 forecast.* EMCa has countered this by applying a similarly highly rounded 10% in response.

It is worth noting that since AA5, DBP has enhanced its cost estimating methodologies. As part of these improvements, contingency is no longer included in most estimates, including those within this current portfolio of works. This practice helps ensure we are not over inflating our estimates as part of budgeting and business planning processes, which includes our AA6 project planning.

Forecasts will more often than not be incorrect, particularly when estimating 5+ years out. We acknowledge there have been reductions in costs when compared to forecasts on some projects such as the refurbishment of underground oil sump tanks, which ended up being cheaper than we estimated. However, more often than not, we have seen costs increase.

For example, compressor station site accommodation costs have more than doubled, requiring us to reduce the scope and volumes over the AA5 and AA6 periods. As shown in the opex forecasting method, the general trend for costs is upwards. Capex is no different. However, it should be highlighted that this upwards trend does not equate to an over-forecast.

We maintain that our forecasts are our best estimate of the project costs and therefore should be in their entirety considered conforming capex. Moreover, neither EMCa nor the ERA have adequately justified the need for the cut or provided any level of information about the process used, or analysis supporting how they have determined the unit rates on these projects are 10% too high.

We maintain that the unit rates on these compression asset class projects meet the requirements of the NGR to be deemed conforming capex and included in DBP's AA6 forecast capex allowance.

Appendix A Northern Depot

Currently, our staff operates out of a leased house in Baynton, which is far from ideal for handling the complexities of gas pipeline operations. The property is small, has limited storage, and often becomes overwhelmed with tooling and equipment, particularly during handovers or periods of high maintenance. Establishing a dedicated operational hub in the north would significantly enhance response times to emergencies and maintenance issues. With personnel and resources stationed nearby, DBP can address problems promptly, minimising downtime and ensuring the continuous operation of pipelines. The hub would remove the need for additional time and travel getting to CS1 to collect parts and tools.

Moreover, a northern hub would improve operational efficiency. It would serve as a centralised location for logistics, maintenance coordination, and daily operations oversight, reducing the complexities of managing these activities from a distant headquarters. DBP also has many key customers in the area that need service with timely and effective maintenance and proactivity towards operational issues.

A dedicated hub would provide secure, organised storage for tools and spare parts, protecting them from environmental damage and theft. This ensures equipment is readily available and in good condition, which is essential for swift maintenance and emergency responses.

The operational hub would provide industry-standard accommodation for staff, greatly improving their wellbeing. The hub would feature comfortable living quarters, modern amenities, and recreational areas, which would help reduce travel fatigue, enhance job satisfaction, and boost morale. This investment in better accommodation aligns with good industry practices, showing a commitment to the health and wellbeing of employees.

The original DBNGP set up by SECWA and commenced operation in 1984 was sectionalised into North, Central and South with depots based at Karratha for the northern section, Geraldton for the central section and Jandakot for the southern section.

The DBNGP at the time was resourced from these locations with workforce based at Karratha, Geraldton and the metro area for the section of pipeline from CS9 to Bunbury. The workforce worked a 9-day fortnight in the office as well as in the field.

In 1998, Epic, the owner of the DBNGP, reviewed the operation and introduced the concept of fly in and fly out of Perth enabling the organisation to set up resources that can choose where they live but be available from the pickup location at Perth airport and transport them to set locations on the DBNGP.

The DBNGP was the first pipeline to operate its maintenance staff on a fly or drive in and fly or drive out basis.

This work pattern has worked well but in recent times with the growth of the Karratha town and the development of the northwest, a base location in Karratha was developed with the leasing of houses where staff on FIFO can base themselves from and then drive to the local work locations and back to their own accommodation. This option also alleviates the cost increases on access to hotels and motels in Karratha.

These changes have challenged the current arrangement of using rented accommodation to base staff from and sharing their temporary home with workplace and space to park work vehicles and set up services for spares and emergency responses.

This project seeks to upgrade the existing arrangements so that it can house a suitable space for work vehicles, trucks, equipment and holding spares for immediate and emergency response co located with accommodation preferably in the Karratha Industrial area.

This project is seeking approval for the funding of a work base at Karratha to support the FIFO team working from this location to service DBNGP equipment located between I1-01 and the Maitland Industrial Estate.

The planning process was firstly to conduct a feed study to assess most efficient way to deliver this as well as the setting up of support requirements to make the facility efficient as a workplace and a work from alternative.

It was planned to be delivered in 2030 to allow for better optimisation of solutions and location in a relatively volatile market in Karratha whilst the existing arrangement is maintained to ensure we can continue to deliver the services to our customers.

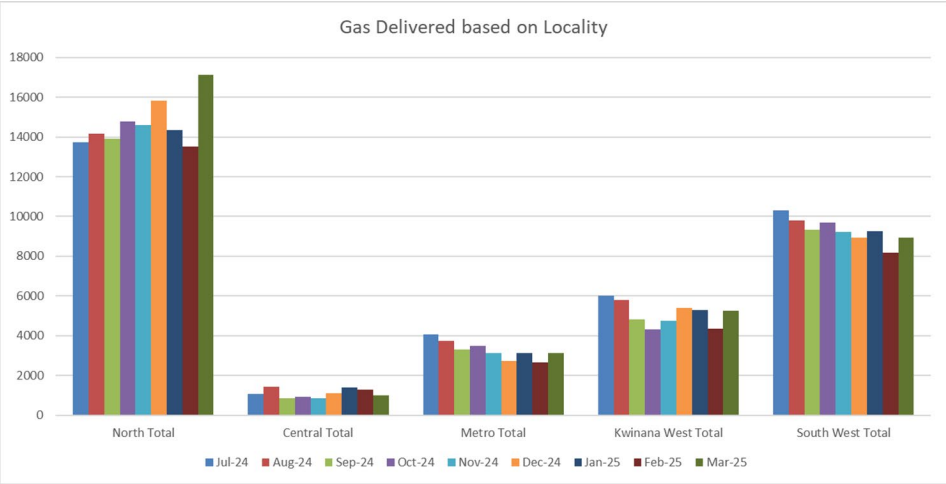
The later timing within AA6 reflects the need to coordinate with the Jandakot Redevelopment, compressor station accommodation upgrades, and broader capital portfolio planning. These dependencies also influence the availability of operational resources. The project is later in the period due to phasing as opposed to a lack of need.

During AA5 the DBNGP saw the first changes in the operation of the pipeline with the development and modifications associated with the Waitsia project as well as the development associated with the Pluto expansion associated with Scarborough gas and the Perdaman facilities. Other developments associated with the Producers of the DBNGP to cater for customers in the Onslow areas.

The growth of the TGS gas storage facility has also impacted on the customers and shippers on the DBNGP where services from the DBNGP to meet these producers have increased significantly that we now have a transmission network with gas flow changes and our customer bases are centralised in the Pilbara and the South West.

This chart below shows the volume of gas delivered from the DBNGP with the North total averaging 1400TJ/day compared to the southern total (sum of Metro, Kwinana West and Southwest) of 1700TJ/day with mid-west about 100 TJ/day.

High and growing demand in the north vs other areas



The increase in demand in the Pilbara that is closely similar to the flows into the southwest meant that the DBNGP has high volume meter stations as well as high volume inlet stations to meet the needs of our customers. The presence of an operational hub in Karratha is critical and to the same degree as the Jandakot based resources.

DBP accepts the ERA's commentary that the level of supporting documentation for investment is not as advanced and appreciates that the need for the operational depot is not in question.

However, DBP is seeking to avoid a situation where the ERA determines that no allowance is warranted due to the absence of a functional outcome during the AA6 period due to the rolling nature of structures investments such as Jandakot Redevelopment and the compressor site accommodation projects, and being in a situation entering AA7 without sufficient funding to fully assess requirements, complete design work, and undertake necessary pre-construction activities. This would risk proposed investments failing to meet the National Gas Rules (NGR) investment tests for AA7.

Therefore, to ensure readiness for AA7, DBP proposes a revised allowance of $575,000. This figure is based on recent experience in developing fit-for-purpose operational and accommodation facilities and is intended to cover:

- Preliminary design and architectural planning
- Workforce engagement
- Site surveying
- Detailed construction planning
- Market testing and procurement of project execution

This level of funding represents approximately 25% of the actual costs incurred for the equivalent planning phase of the Jandakot Redevelopment and is considered a reasonable and efficient estimate to support investment test compliance for AA7.

Appendix B Working at Heights – Site Specific Audit

See spreadsheet submitted: '9.12 Structures & Operational Sites - Working at Heights - Appendix B - Site Specific Audit (Public)'