



Economic Regulation Authority

Final decision on revisions to the access arrangement for the Dampier to Bunbury Natural Gas Pipeline (2026 to 2030)

Attachment 2: Demand

18 December 2025

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Contents

Attachment 2. Summary	1
Regulatory requirements	4
ERA draft decision	5
DBP response to draft decision	7
Submissions to the ERA	9
Final decision	10
Assessment of revised capacity forecast	10
Assessment of revised throughput forecast	11
ERA final decision	11

List of appendices

Appendix 1 List of Tables	14
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Note

This attachment forms part of the ERA's final decision on the proposed revisions to the access arrangement for the Dampier to Bunbury Natural Gas Pipeline. It should be read in conjunction with all other parts of the final decision, which is comprised of the following document and attachments:

- Final decision on revisions to the access arrangement for the Dampier to Bunbury Natural Gas Pipeline - Overview, 18 December 2025
 - Attachment 1: Access arrangement and services
 - Attachment 2: Demand (this document)
 - Attachment 3: Revenue and tariffs
 - Attachment 4: Regulatory capital base
 - Attachment 5: Operating expenditure
 - Attachment 6: Depreciation
 - Attachment 7: Return on capital, taxation, incentives
 - Attachment 8: Other access arrangement provisions
 - Attachment 9: Service terms and conditions

Numerical amounts in tables throughout this document are generally shown to 1 decimal place. Total numerical amounts that are shown may not add exactly due to rounding. The tariff (revenue) model that was used for this decision should be used for accurate unrounded numerical amounts.

Attachment 2. Summary

Demand forecasts directly influence the levels of capital and operating expenditure required by the service provider over the access arrangement period. These forecasts serve as a primary input into the revenue model, used to determine the network tariffs the service provider is permitted to charge.

Under the access arrangement, DBP offers three reference services: full haul T1 Service, part haul P1 Service and back haul B1 Service. Demand for these reference services is measured using two metrics: unweighted volume (gas demand) and distance-weighted Full Haul Equivalent (FHE) volume, known as “FHE demand”. Gas demand comprises capacity and throughput, while FHE demand is derived from the underlying gas demand and is used to calculate the applicable reference tariff.¹

The DBNGP is a critical domestic energy infrastructure pipeline for Western Australia. It begins in Dampier, in the north, and extends approximately 1,600 kilometres south to Bunbury. The pipeline connects gas production facilities in the north-west to mining, industrial, commercial and residential customers. Emerging gas projects in the Perth Basin, approximately 350 kilometres north of Perth, can supply gas to the DBNGP.²

DBP’s revised demand proposal in response to the draft decision incorporated known contractual changes and some of the ERA’s adjustments set out in the draft decision.

DBP did not include capacity forecasts for planned projects that it considered unlikely to be commissioned during AA6. It also did not include increases in capacity demand from shippers in gas power generation arising from potential delays of new renewable and storage projects, or from intermittency associated with renewable power generation. DBP also did not adopt the ERA’s draft decision approach of assessing historical load factors at both contract and shipper levels for determining forecast throughput.³

For AA6, DBP’s revised proposal for reference services forecast an average FHE capacity of 549.3 TJ/d and gas throughput of 486.6 TJ/d.

In this final decision, the ERA has assessed DBP’s revised demand forecast for the reference services, using information submitted by DBP, actual gas demand during AA5, stakeholder submissions and feedback, as well as information from the Australian Energy Market Operator (AEMO).

The ERA has adjusted DBP’s revised capacity forecast to include intended capacity demand from existing shippers on the DBNGP in AA6 that is not yet contracted, as well as from prospective capacity demand associated with new projects from these existing shippers that are highly likely to become operational during AA6.

The ERA maintains its draft decision that historical load factors should be assessed at both contract and shipper levels, recognising that shippers may vary throughput across their portfolios using multiple contracts and service types.

¹ The full haul distance is 1,399 kilometres. The FHE factor of part haul (P1) and back haul (B1) services is the contracted distance proportionate to the full haul distance, with a maximum factor of 1.0 for the full haul (T1) service. The FHE demand is calculated as gas demand multiplied by the FHE factor.

“Capacity” is the volume of gas reserved during the contracted period; whereas “throughput” is the actual volume of gas transported.

² DBP, *Final Plan 2026-2030*, January 2025 ([online](#)) (accessed December 2025).

³ Some shippers have multiple contracts and/or contracting in multiple reference service types.

Recognising the uncertainties surrounding gas demand during the energy transition, the ERA has decided to introduce a fixed principle to allow future tariff adjustments in circumstances where actual demand for reference services differ materially from the demand forecast during AA6. Details of this fixed principle for demand uncertainty are provided in Final Decision Attachment 8.

For AA6, the ERA has forecast an average full haul equivalent (FHE) capacity of 626.9 TJ/d and gas throughput of 560.2 TJ/d.

Table 2.1 and Table 2.2 compare the ERA's and DBP's demand forecast and FHE basis.

Table 2.1: Reference service gas demand forecast comparison between DBP revised proposal and ERA final decision (average TJ/d)

	DBP revised proposal	ERA final decision	Variance	Variance %
Capacity				
Full haul	479.3	548.5	69.2	14.4
Part haul	377.1	395.3	18.2	4.8
Back haul	333.0	345.4	12.4	3.7
Total	1,189.4	1,289.2	99.8	8.4
Throughput				
Full haul	435.7	501.0	65.3	15.0
Part haul	245.5	254.5	9.0	3.7
Back haul	221.0	243.8	22.8	10.3
Total	902.2	999.4	97.2	10.8

Source: DBP revised proposal; ERA analysis.

Table 2.2: Reference service FHE demand forecast comparison between DBP revised proposal and ERA final decision (average TJ/d)

	DBP revised proposal	ERA final decision	Variance	Variance %
Capacity (FHE)				
Full haul	479.3	548.5	69.2	14.4
Part haul	37.6	45.6	8.0	21.3
Back haul	32.4	32.9	0.5	1.5
Total	549.3	626.9	77.6	14.1
Throughput (FHE)				
Full haul	435.7	501.0	65.3	15.0
Part haul	29.3	35.7	6.4	21.8
Back haul	21.6	23.5	1.9	8.8
Total	486.6	560.2	73.6	15.1

Source: DBP revised proposal; ERA analysis.

Summary of required amendments:

Required amendment 2.1

The capacity and throughput forecasts for AA6 must be amended to reflect the values in Table 2.8 and Table 2.9 of Final Decision Attachment 2. The amended forecasts must be set out in the access arrangement information.

Regulatory requirements

1. The *National Gas Access (WA) Act 2009* implements a modified version of the National Gas Law (NGL) and National Gas Rules (NGR) in Western Australia. The rules referenced in this decision are those that apply in Western Australia.⁴
2. Further to preparing an access arrangement proposal for approval, the NGR requires the service provider to prepare and submit Access Arrangement Information (AAI).⁵ AAI is information that is reasonably necessary for users (including prospective users) to understand the background to the access arrangement; and the basis and derivation of the various elements of the access arrangement.⁶
3. AAI must include any information that is specifically required by the NGL and NGR. Rule 72 sets out specific requirements for AAI relevant to price and revenue regulation and includes the following information needs related to demand:
 - Where the access arrangement period commences at the end of an earlier access arrangement period, AAI for a transmission pipeline must include the following usage information over the earlier access arrangement period:
 - Minimum, maximum and average demand for each receipt or delivery point.
 - User numbers for each receipt or delivery point.
4. To the extent it is practicable to forecast pipeline capacity and use of pipeline capacity over the access arrangement period, AAI must include a forecast of pipeline capacity and use of pipeline capacity over that period and the basis on which the forecast has been derived.
5. Where forecasts and estimates are provided, they must adhere to the requirements set out in rule 74:
 - The forecast or estimate must be supported by a statement that sets out the basis for the forecast or estimate.
 - The forecast or estimate must be arrived at on a reasonable basis and must represent the best forecast or estimate possible in the circumstances.
6. Additionally, under rule 75, any information that is inferred or derived from other information must be supported by the primary information on which the extrapolation or inference is based.

⁴ The current rules that apply in Western Australia are available from the Australian Energy Market Commission: AEMC, 'National Gas Rules (Western Australia)' ([online](#)) (accessed December 2025). At the time of this decision, *National Gas Rules – Western Australia version 12 (1 February 2024)* was in effect.

⁵ NGR, rule 43.

⁶ NGR, rule 42.

ERA draft decision

7. There are three reference services offered under the access arrangement: Full Haul (T1), Part Haul (P1) and Back Haul (B1) services. Demand for these reference services is measured using two metrics: unweighted volume (gas demand) and distance-weighted FHE volume, known as FHE demand. Gas demand comprises capacity and throughput, while FHE demand is derived from the underlying gas demand and is used to calculate the applicable reference tariff.
8. For AA6, DBP acknowledged that the transition to a net zero emissions economy makes forecasting gas demand more complex. Consequently, DBP used the contracted capacity of its shippers as the basis for its forecast gas demand for reference services over the period. DBP's approach to forecasting capacity for AA6 aligned with the method used for AA5, by using committed capacity and known additional capacity expected to be finalised during AA6. The forecast excluded any other new capacity that may be required by shippers, with DBP indicating that no further capacity requirements were expected during AA6. DBP's throughput forecast was derived by applying historical utilisation rates (load factors) to the projected capacity.
9. For the draft decision, the ERA assessed DBP's gas demand forecast for reference services, using information submitted by DBP, actual gas demand for reference services during AA5, stakeholder submissions in response to the ERA's issues paper, as well as information from AEMO and the federal Department of Industry, Science and Resources.
10. The ERA considered that it was not sufficient to only forecast for committed and known additional capacity. Where new shippers or projects were expected to connect during AA6, we required DBP to incorporate a reasonable capacity forecast in its revised proposal to enhance the robustness of the demand forecast. Our draft decision also incorporated some additional capacity for existing contracts, based on additional information provided by DBP in response to information requests.
11. The ERA considered that using actual AA5 load factors that reflect historical trends was a reasonable approach to forecast gas throughput. For the draft decision, we revised the throughput forecast using the most recent actual load factor data and undertook an assessment at both contract and shipper levels.
12. Table 2.3 and Table 2.4 set out DBP's proposed gas demand and FHE demand forecast, and the ERA's revised forecast as determined by the draft decision for AA6.
13. The ERA set out the following draft decision required amendment:

Draft Decision Required Amendment 2.1

DBP is required to amend the gas demand and Full Haul Equivalent (FHE) demand forecasts in its revised proposal to reflect the following:

- The ERA's forecast values as set out in Table 2.8 and Table 2.9 in Draft Decision Attachment 2.
- The ERA's determinations as outlined in paragraph 46 to 47 in Draft Decision Attachment 2.
- Any additional demand that DBP becomes aware of prior to the submission of its revised proposal.

Table 2.3: AA6 reference service gas demand forecast comparison between DBP proposal and ERA draft decision (average TJ/d)

	DBP proposal	ERA draft decision	Variance	Variance %
Capacity				
Full haul	481.4	482.4	1.0	0.2
Part haul	252.0	262.8	10.8	4.3
Back haul	332.6	333.0	0.4	0.1
Total	1,066.0	1,078.2	12.2	1.1
Throughput				
Full haul	438.1	439.1	1.0	0.2
Part haul	136.7	149.5	12.8	9.4
Back haul	174.8	229.7	54.9	31.4
Total	749.6	818.3	68.7	9.2

Source: ERA, Draft decision on revisions to the access arrangement for the Dampier to Bunbury Natural Gas Pipeline (2026 to 2030) – Attachment 2: Demand, Table 2.1.

Table 2.4: AA6 reference service full haul equivalent demand forecast comparison between DBP proposal and ERA draft decision (average TJ/d)

	DBP proposal	ERA draft decision	Variance	Variance %
Capacity (FHE)				
Full haul	481.4	482.4	1.0	0.2
Part haul	34.8	37.9	3.1	8.9
Back haul	32.4	32.4	0.0	0.0
Total	548.6	552.7	4.1	0.8
Throughput (FHE)				
Full haul	438.1	439.1	1.0	0.2
Part haul	26.6	29.7	3.1	11.7
Back haul	16.4	22.7	6.3	38.4
Total	481.1	491.5	10.4	2.2

Source: ERA, Draft decision on revisions to the access arrangement for the Dampier to Bunbury Natural Gas Pipeline (2026 to 2030) – Attachment 2: Demand, Table 2.2.

DBP response to draft decision

14. DBP submitted a revised demand proposal that incorporated known contractual changes and some of the ERA's adjustments from the draft decision.⁷
15. DBP's revised capacity forecast and associated throughput forecast includes the following amendments:
 - Adjustments to existing contracts with information available since the release of the draft decision.
 - Accepted adjustments to capacity and associated throughput for existing contracts per the ERA's draft decision.
 - Capacity and throughput for projects under construction that were expected by DBP to be commissioned in AA6.
16. DBP did not revise the capacity forecast and associated throughput forecast for the following:
 - Potential demand for planned projects that DBP considered as unlikely to be commissioned during AA6.
 - A potential higher demand from shippers in gas power generation due to risks associated with the delay of new renewable and storage projects in power generation and intermittency associated with renewable power generation. DBP notes that the nature of the mixed energy source in power generation could result in either increase or decrease in demand on DBNGP. DBP considers that the demand risk associated with shippers in gas power generation could be managed using non-reference services and the rebateable revenue mechanism, which would reduce the reference tariff should additional demand materialise.
17. DBP did not accept the throughput revision made by the ERA, which was based on historical load factor assessed at both the contract and shipper levels.
18. DBP's revised gas demand and FHE demand forecasts for reference services during AA6 are shown in Table 2.5 and Table 2.6.

⁷ DBP, Revised Final Plan attachment 13.3, August 2025 ([online](#)) (accessed December 2025).

Table 2.5: DBP revised reference service gas demand forecast AA6 (TJ/d)

	2026	2027	2028	2029	2030
Capacity					
Full haul	499.1	477.7	482.7	464.9	471.9
Part haul	385.5	373.8	372.8	376.8	376.8
Back haul	334.6	332.6	332.6	332.6	332.6
Total	1,219.2	1,184.1	1,188.1	1,174.3	1,181.3
Throughput ⁸					
Full haul	429.1	434.0	444.6	432.0	438.8
Part haul	249.0	243.4	242.4	246.4	246.4
Back haul	221.7	220.8	220.8	220.8	220.8
Total	899.8	898.2	907.8	899.2	906.0

Source: DBP, Revised Final Plan Attachment 13.3, August 2025, p. 5.

Table 2.6: DBP revised reference service FHE demand forecast AA6 (TJ/d)

	2026	2027	2028	2029	2030
Capacity (FHE)					
Full haul	499.1	477.7	482.7	464.9	471.9
Part haul	33.4	37.8	37.0	40.0	40.0
Back haul	32.4	32.4	32.4	32.4	32.4
Total	564.9	547.9	552.1	537.3	544.3
Throughput (FHE)					
Full haul	429.1	434.0	444.6	432.0	438.8
Part haul	25.1	29.5	28.7	31.7	31.7
Back haul	21.6	21.6	21.6	21.6	21.6
Total	475.8	485.1	494.9	485.3	492.1

Source: DBP, Revised Final Plan Attachment 13.3, August 2025, p. 6.

⁸ The throughput for part haul and back haul is taken from DBP's tariff model (confidential version) and differs from the values published in DBP's Revised Final Plan Attachment 13.3. The ERA has confirmed with DBP that the correct values are those set out in DBP's tariff model.

Submissions to the ERA

19. Several submissions received in response to DBP's initial proposal and the ERA's issues paper addressed the demand forecast for AA6. In summary:
- Alinta Energy expressed concerns that incorporating uncontracted gas demand in the forecast may overstate overall gas demand, and that the throughput forecast could be significantly influenced by commercial decisions made by a small number of larger shippers.⁹
 - Horizon Power recommended that DBP's gas demand forecast should include uncontracted capacity where there is reasonable certainty that the demand for capacity will materialise during AA6.¹⁰
 - NewGen Power Kwinana considered that basing gas demand forecast solely on firm contracts was conservative and should be viewed as a minimum baseline for the overall forecast.¹¹
 - Wesfarmers Chemicals, Energy and Fertilisers (WesCEF) raised concerns that the public version of DBP's initial proposal lacked sufficient transparency for stakeholders to assess whether the demand forecasts complied with the NGR. WesCEF also recommended that DBP use a variety of data sets, apply a transparent method, and consider the impact of recent policy developments, such as the Commonwealth Government's Future of Gas Strategy and the Western Australian Government's Domestic Gas Policy.¹²
20. The ERA addressed the above matters as part of its draft decision considerations.
21. Following the draft decision and DBP's revised proposal, we received further public submissions:
- Mark Chatfield (an individual) expressed concern that DBP's demand forecast does not reflect increasing gas demand from gas power generators driven by coal retirements, growing demand in the South West Interconnect System, and the continued reliance on gas to support intermittent renewables and limited battery storage capacity. It was considered that an expansion of the DBNGP, or the development of an LNG import facility, will be required to meet the gas supply needs from 2031 as coal fired power stations retire.¹³
 - NewGen reiterated concerns that DBP's demand forecast appeared conservative. As observed in AA5 where actual demand materially exceeded projections, an understated demand forecast is likely to result in higher AA6 reference tariffs than necessary. NewGen considered that DBP has effectively transferred demand risk to shippers and proposed that a revenue "true-up" mechanism be implemented to address material variances between actual and forecast demand in a "highly uncertain demand environment".¹⁴

⁹ Alinta Energy, *Submission in response to DBP proposal and/or ERA issues paper*, 1 April 2025.

¹⁰ Horizon Power, *Submission in response to DBP proposal and/or ERA issues paper*, 26 March 2025.

¹¹ NewGen Power, *Submission in response to DBP proposal and/or ERA issues paper*, 31 March 2025.

¹² Wesfarmers Chemicals, Energy & Fertilisers, *Submission in response to DBP proposal and/or ERA issues paper*, 31 March 2025.

¹³ Mark Chatfield, *Submission in response to ERA draft decision and/or DBP revised proposal*, 7 July 2025.

¹⁴ NewGen Power, *Submission in response to ERA draft decision and/or DBP revised proposal*, 7 July 2025.

Final decision

22. The ERA has reviewed DBP's revised demand proposal, taking into account stakeholder submissions and feedback, and actual demand in 2024 and 2025. The ERA has sought to verify the demand requirements of some shippers during AA6 directly with these shippers. In doing so, the ERA has discovered that not all of these shippers' demand provided by DBP in its revised proposal aligned with their intentions, even for the next year (2026). Some of these shippers noted that they were still in the process of discussions with DBP for 2026 contracting positions or had recently finalised these positions. The ERA considers that in order to arrive at the best possible forecast of demand for the AA6 period, the ERA should take this new information into account.
23. The ERA's assessment of DBP's revised demand forecast is provided in the following sections.

Assessment of revised capacity forecast

24. Based on a review of 2024 and 2025 actual demand for DBNGP, contracted capacity stabilised during this period following the ramping up phase of new shippers that commenced using the DBNGP during AA5. Accordingly, the ERA has revised the capacity forecast for these shippers in AA6 based on the 2024 and 2025 actual data and shippers' feedback.
25. Forecast capacity for some shippers in DBP's revised proposal are still materially lower than their actual capacity in AA5. As noted above, this led to the ERA seeking to verify the AA6 demand requirements directly with these shippers. In doing so, we discovered that not all of these shippers' demand provided by DBP in its revised proposal aligned with their intentions. Some of these shippers were still in the process of discussing their positions for the coming years but had not entered into formal agreements at the time DBP submitted its revised proposal. Also, DBP assumed that one shipper would relinquish capacity from January 2027. The ERA contacted this shipper to verify its likely intentions as a formal relinquishment notice was not received prior to the ERA needing to finalise its demand forecast. Based on feedback from shippers regarding their intended gas transportation requirements, the ERA has revised the capacity forecast for these shippers in this final decision.
26. There is significant uncertainty surrounding gas demand from shippers in gas power generation during AA6 due to uncertainty on the mix of gas in the South West Interconnected System with planned retirements of coal generation and increasing entry of renewables and batteries into the power system. These shippers might also seek access to non-reference services if available for additional capacity. The ERA has revised the capacity forecast for shippers which are involved in gas power generation based on their actual capacity profiles from AA5 and the feedback provided regarding their intended capacity requirements for AA6. The ERA has not included any potential demand increase in gas-powered generation that has not been announced and that may eventuate during AA6. DBP itself didn't include any additional forecast noting its concerns on the uncertainties.¹⁵
27. The ERA has further reviewed and assessed planned projects that use gas as an energy input but were not included in DBP's revised forecast, as DBP did not expect

¹⁵ In contrast to its AA6 demand forecasts, DBP's future of gas modelling (which commences from 2031, the first year of AA7), forecasts that the DBNGP will be at full capacity in 2031 in part due to increased requirements from gas powered generation.

these projects to be operational during AA6. Based on feedback from relevant shippers, the ERA considers that some of these projects are highly likely to become operational during AA6. Therefore, it is highly probable that these projects will require gas transportation services during AA6 and as such the ERA has included the associated capacity forecast in this final decision.

Assessment of revised throughput forecast

28. For the throughput forecast, the ERA maintains its draft decision position to forecast throughput by considering load factors at both the contract and shipper levels. This approach recognises that shippers with multiple contracts and/or service types may vary throughput across their portfolios.

ERA final decision

29. The ERA's final decision incorporates additional capacity and associated throughput based on the assessments outlined above and are set out in Table 2.7.

Table 2.7: ERA's final decision adjustment to DBP's revised gas demand (TJ/d)

	2026	2027	2028	2029	2030
Capacity					
Full haul	24.6	54.8	76.0	91.7	99.2
Part haul	17.4	26.2	6.0	4.9	36.2
Back haul	5.3	11.3	15.5	19.7	10.3
Total	47.3	92.3	97.5	116.3	145.7
Throughput					
Full haul	22.2	51.3	71.9	87.0	94.3
Part haul	10.1	19.1	(2.5)	(5.1)	23.6
Back haul	19.3	22.3	24.4	26.5	21.8
Total	51.6	92.7	93.8	108.4	139.7

Source: ERA analysis.

30. The ERA's demand forecast indicates growth during AA6, consistent with AEMO's recent analysis, ahead of its 2025 Gas Statement of Opportunities release, that gas consumption in Western Australia will trend upwards over the period 2026 to 2030.
31. Recognising the uncertainties surrounding gas demand during the energy transition, the ERA has decided to introduce a tariff variation mechanism and fixed principle to allow future tariff adjustments in circumstances where actual demand for reference services differs by more than +/- 5% from the demand forecast during AA6. Details of this tariff variation mechanism and fixed principle for demand uncertainty are provided in Final Decision Attachment 8.

32. The ERA considers that its demand forecasts are the best possible forecasts in the circumstances and have been derived on a reasonable basis.
33. For this final decision, the ERA's demand forecast for reference services during AA6 is set out in Table 2.8 and Table 2.9.

Table 2.8: ERA final decision reference service gas demand forecast for AA6 (TJ/d)

	2026	2027	2028	2029	2030
Capacity					
Full haul	523.7	532.5	558.7	556.6	571.1
Part haul	402.9	400.0	378.8	381.7	413.0
Back haul	339.9	343.9	348.1	352.3	342.9
Total	1,266.5	1,276.4	1,285.7	1,290.5	1,327.0
Throughput					
Full haul	451.3	485.3	516.5	519.0	533.1
Part haul	259.1	262.5	239.9	241.3	270.0
Back haul	241.0	243.1	245.2	247.3	242.6
Total	951.3	990.8	1,001.6	1,007.6	1,045.7

Table 2.9: ERA final decision reference service FHE demand forecast for AA6 (TJ/d)

	2026	2027	2028	2029	2030
Capacity (FHE)					
Full haul	523.7	532.5	558.7	556.6	571.1
Part haul	44.7	57.7	37.7	35.5	52.1
Back haul	32.6	32.8	33.0	33.1	32.8
Total	601.0	623.0	629.4	625.3	656.0
Throughput (FHE)					
Full haul	451.3	485.3	516.5	519.0	533.1
Part haul	34.3	48.0	28.1	25.9	42.3
Back haul	23.3	23.5	23.6	23.6	23.5
Total	509.0	556.7	568.1	568.5	598.9

Required amendment 2.1

The capacity and throughput forecasts for AA6 must be amended to reflect the values in Table 2.8 and Table 2.9 of Final Decision Attachment 2. The amended forecasts must be set out in the access arrangement information.

Appendix 1 List of Tables

Table 2.1:	Reference service gas demand forecast comparison between DBP revised proposal and ERA final decision (average TJ/d)	2
Table 2.2:	Reference service FHE demand forecast comparison between DBP revised proposal and ERA final decision (average TJ/d)	3
Table 2.3:	AA6 reference service gas demand forecast comparison between DBP proposal and ERA draft decision (average TJ/d)	6
Table 2.4:	AA6 reference service full haul equivalent demand forecast comparison between DBP proposal and ERA draft decision (average TJ/d)	6
Table 2.5:	DBP revised reference service gas demand forecast AA6 (TJ/d)	8
Table 2.6:	DBP revised reference service FHE demand forecast AA6 (TJ/d)	8
Table 2.7:	ERA's final decision adjustment to DBP's revised gas demand (TJ/d)	11
Table 2.8:	ERA final decision reference service gas demand forecast for AA6 (TJ/d)	12
Table 2.9:	ERA final decision reference service FHE demand forecast for AA6 (TJ/d)	12