From: Derek Unterburger <

Sent: Tuesday, 13 April 2021 8:20 AM

To: LNG netback review Cc: Simon Mewing

Subject: Westside Corporation Submission on LNG Netback Review

Thank you for the opportunity to provide feedback in relation to the ACCC's netback price series. Westside supports APPEA's submission in relation to the price series, however, would also like to add some further points.

Westside is not an LNG exporter but is a material gas producer and substantial holder of gas reserves in Eastern Australia. We have made a material investment into the gas assets to date to reach this position.

Westside sees the ACCC LNG Price series is a useful reference tool in the gas market. The development of large scale LNG in QLD has been crucial to the development of the gas resources and the synergies it creates and now investments undertaken for GLNG can now be leveraged to supply the domestic market. In Westsides case, our GLNG supply contract has enabled the establishment of a firm infrastructure and production base which we have then leveraged to offer gas to the domestic market. When considering how to market our gas , we have historically responded to market demand and priced our gas in a structure which differs to the LNG netback series, i.e. fixed price with CPI indexation. This highlights that the netback series is but one input when considering our approach. We also note that an LNG netback pricing basis may not provide a reasonable basis to manage the risks, costs and drivers of Westside's business

Our current strategy is to continue to grow and provide additional supply to both domestic and for LNG and we conclude that Increased supply from a diverse number of players is the best way to deliver meaningful competition. It is a fact that LNG exporters are the largest suppliers to the markets which we actively compete in.

We believe the series is no more than a marker of what competitive dynamics may be in place. We agree with the transparency that the ACCC obtains and publishes all actual offers and bids in the market on a non-attributable basis.

While it is not the focus of this review, Westside notes that there has been some proposals by gas buyers to create a firm gas marker through the code of conduct process and notes that such an approach is inconsistent with our own risk management, commercial and development practices. If such a reference were in some way mandated, it is probable that our shareholders would reduce their investment and development plans

In summary, Westside is currently actively marketing gas to domestic customers and actively seeking investment to support the production and delivery of that gas. Westside is concerned that the current price discussions may materially and adversely affect our business.

Westside would welcome the opportunity to discuss these issues and broaden the discussion beyond the current focus on LNG exporters alone.

Regards

Simon Mewing

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