



01 June 2021

Submission: National Greenhouse and Energy Reporting (Safeguard Mechanism) Amendment (Prescribed Production Variables Update) Rule 2021

The Australian Pipelines and Gas Association (APGA) represents the owners, operators, designers, constructors and service providers of Australia's pipeline infrastructure, with a focus on high-pressure gas transmission. APGA's members build, own and operate the gas transmission infrastructure connecting the disparate gas supply basins and demand centres of Australia, offering a wide range of services to gas producers, retailers and users.

APGA welcomes the opportunity to contribute to the National Greenhouse and Energy Reporting (Safeguard Mechanism) Amendment (Prescribed Production Variables Update) Rule 2021 (the **Amendment**).

APGA agree that the insertion of *Section 61 Work of compression applied to natural gas or plant condensate* within the Amendment is the most reasonably practical approach to developing a Safeguard Mechanism process variable for gas compression.

APGA commends DISER for its approach in developing this Amendment. The DISER team's willingness to engage with industry on a physically complex topic should stand as an example of how industry and government can work together to find practical solutions to complex problems.

To discuss any of the above feedback further, please contact APGA's National Policy Manager, Jordan McCollum, on +61 422 057 856 or jmccollum@apga.org.au.

Yours Sincerely,

A handwritten signature in dark ink, appearing to be "JM", is written over a light grey horizontal line.

JORDAN MCCOLLUM
National Policy Manager