



3 April 2023

## **Submission: Transportation Service Point Register**

The Australian Pipelines and Gas Association (APGA) represents the owners, operators, designers, constructors and service providers of Australia's pipeline infrastructure, connecting natural and renewable gas production to demand centres in cities and other locations across Australia. Offering a wide range of services to gas users, retailers and producers, APGA members ensure the safe and reliable delivery of 28 per cent of the end-use energy consumed in Australia and are at the forefront of Australia's renewable gas industry, helping achieve net-zero as quickly and affordably as possible.

APGA welcomes the opportunity to contribute to the AEMO consultation on changes to the transportation service point register (TSPR). While we approve of the proposed changes, the timeliness of this process raises concern within the industry.

Throughout the 2018 consultation on the Day Ahead Auction implementation, pipeline service providers flagged concerns with the proposed approach to TSPR amendments. Industry concerns included the risk that the TSPR may become out of step with the operation of infrastructure, leading to poor market outcomes. This is what has been observed in this instance of TSPR amendment, with some changes currently under consultation having been proposed up to four months prior to consultation, well in advance of the timeframe required by the Capacity Transfer and Auction Procedures. This is despite advice to AEMO of when the changes to pipeline infrastructure would need to enter commercial operation.

Following this four month wait, the current 'expedited consultation' concludes on 3 April. This leaves industry with a limited period of time to implement changes prior to commencement of commercial operation. Without recognition in the updated TSPR, pipeline service providers risk being in breach of Day Ahead Auction compliance requirements under the National Gas Law. Given the importance and pace of the energy transition it is disappointing that customers are unable to access services due to delays in AEMO processes.

APGA appreciates that there has been high level of recent activity in gas market regulation. However, this delay to consult on simple *non-material* changes to the TSPR in a timely manner raises concerns around whether AEMO is sufficiently resourced to act upon its responsibilities as market operator.

If the delay to consult is an indication of under resourcing, AEMO's ability to fulfil its current and future gas market functions, including its new powers to monitor and direct in the event of a gas supply adequacy event, may be compromised.

To discuss any of the above feedback further, please contact me on +61 422 057 856 or [jmccollum@apga.org.au](mailto:jmccollum@apga.org.au).

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'JM', is positioned below the closing text.

JORDAN MCCOLLUM  
National Policy Manager  
Australian Pipelines and Gas Association