



17 April 2025

Submission: National Gas Amendment (ECGS Notice of closure for gas infrastructure) Rule

The Australian Pipelines and Gas Association (APGA) represents the owners, operators, designers, constructors and service providers of Australia's pipeline infrastructure. APGA members ensure safe and reliable delivery of over 1,500 PJpa of gas consumed in Australia alongside over 4,500 PJpa of gas for export.

APGA welcomes the opportunity to contribute to the Australian Energy Market Commission's consultation on implementing a Notice of Closure requirement for gas transport and delivery infrastructure connected to the East Coast Gas System (ECGS).

The proposal for a formalised notice of closure period for gas transmission infrastructure is reasonable, although potentially a solution in search of a problem. Any customer with a firm service contract will have a high degree of confidence the service will not close for the length of the contract. Further, this information is generally volunteered on the Bulletin Board as a factor that may affect medium-term capacity. Nevertheless, a formal obligation to publish would support capacity certainty.

APGA previously¹ recommended that 36 months would be an appropriate period to align with current uncontracted capacity outlook reporting for pipelines and production facilities. This aligns with both Option 1 and Option 2.

Both of these options have merits and potential costs. Option 2 would likely require changes to reporting systems for some participants, and hence additional costs, relative to Option 1. Given this APGA prefers Option 1. AEMO can provide further transparency by flagging reported closures and amendments to reported closure dates to market participants.

On scoping the notice requirement:

- **Scale of included infrastructure:** Presumably the proponent intends for this requirement to apply to the complete closure of a Bulletin Board facility. This must be adequately specified in the rules to ensure it is not so broad as to capture decommissioning of a single piece of equipment, such as a compressor, as the future de-rating of a BB facility's capacity would already be captured under existing BB reporting, such as the facility's nameplate rating and/or capacity outlooks.

¹ APGA, 2023, *Reliability and Supply Adequacy framework for the East Coast Gas Market*, <https://apga.org.au/submissions/reliability-and-supply-adequacy-framework-for-the-east-coast-gas-market>

- **'Good faith' notifications and force majeure:** While the proponent considers this to be adequately covered by the NGL and NGR, this should be separately described in the Rules to ensure that businesses are not penalised for making agile shorter-term decisions. Or, in the case of situations outside the control of the asset owner such as termination of a supply contract by a single majority user, penalised for decommissioning an asset within the 36 month period.

To discuss any of the above feedback further, please contact me on +61 409 489 814 or crafael@apga.org.au.

Yours sincerely,



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