

Dr Kris Funston
Executive General Manager
Australian Energy Regulator
GPO Box 3131
CANBERRA ACT 2601

Lodge by email: AERgasreform@aer.gov.au

Re: APA Submission to draft Pipeline Access Dispute Guide

Dear Mr Funston,

Thank you for the opportunity to comment on the draft Pipeline Access Dispute Guide (Draft Guide) published by the AER on 28 September 2023.

APA is an ASX listed owner, operator, and developer of energy infrastructure assets across Australia. As well as an extensive network of natural gas pipelines, we own or have interests in gas storage and generation facilities, electricity transmission networks, and over 681 MW of renewable generation infrastructure.

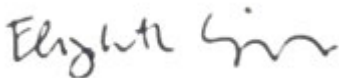
We support the transition to a lower carbon future. In August 2022, we published our inaugural Climate Transition Plan which outlines our commitments to support Australia's energy transition and pathway to net zero operations emissions by 2050. In September 2023 we released our first Climate Report disclosing our progress against our Climate Transition Plan.

Gas infrastructure providers operate in a competitive market with pipeline investment underpinned by bespoke, long term contracts between customers and the pipeline infrastructure provider. These arrangements continue to support the efficient, incremental expansion of gas infrastructure and ensure that gas is delivered when and where it is needed. To date, APA has not had any disagreements with customers that have led to a formal access dispute.

The March 2023 updates to the National Gas Law and National Gas Rules have required the AER to update its 2008 Guideline for resolution of distribution and transmission pipeline access disputes. We have reviewed the Draft Guide and do not have any substantive comments.

If you have any questions about our submission, please contact [REDACTED]

Regards,



Beth Griggs
General Manager, Economic Regulation and External Policy
Strategy and Corporate Development