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Australian Energy Regulator

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Annual Compliance Order for gas pipeline service providers 2024 – consultation

AGL Energy (AGL) welcomes the opportunity to provide feedback on the Australian Energy Regulator (AER) Annual Compliance Order (ACO) for gas pipeline service providers 2024 consultation.

Proudly Australian for more than 186 years, AGL supplies around 4.3 million energy and telecommunications customer services. AGL is committed to providing our customers simple, fair, and accessible essential services as they decarbonise and electrify the way they live, work, and move.

AGL operates Australia's largest private electricity generation portfolio within the National Electricity Market (NEM), comprising coal and gas-fired generation, renewable energy sources such as wind, hydro and solar, batteries and other firming technology, and gas production and storage assets. We are building on our history as one of Australia's leading private investors in renewable energy to now lead the business of transition to a lower emissions, affordable and smart energy future in line with the goals of our Climate Transition Action Plan.

AGL supports recent compliance changes to the National Gas Law (NGL) and National Gas Rules (NGR), and the AER's proposed ACO for gas pipeline service providers 2024, as these are likely to lead to:

- Improved transparency.
- Improved commercial negotiation with pipeline service providers.
- More cost-effective services.
- Reduced risk of uncompetitive practices.

Furthermore, we consider:

- the information sought in the ACO is clear and understandable.
- the template for responses to the ACO is accessible and fit for purpose.
- the scope of the information sought in the ACO is appropriate.
- the level of assurance sought for information provided, as contained in clause five, is appropriate.
- the benefits associated with greater transparency, improved commercial negotiation, cost-effectiveness, and competition, outweigh the additional burden on businesses to compile a response to the latest ACO.

If you have any queries about this submission, please contact Alifur Rahman on [REDACTED] or at [REDACTED]

Yours sincerely,

Chris Streets

Senior Manager Wholesale Markets Regulation