



5 April 2024

Our Reference: APLNG – COR – 1048824

Attention: Sarah Danos  
Director  
Future of Network Regulation  
Australian Energy Regulator  
23 Marcus Clarke Street  
Canberra ACT 2601

By E-mail: [PipelineFOR@aer.gov.au](mailto:PipelineFOR@aer.gov.au)

Dear Ms Danos

Australia Pacific LNG Pty Ltd (**APLNG**) welcomes the opportunity to contribute to the consultation process on the draft amendments to the pipeline regulatory determinations and elections guide.

APLNG is an incorporated company and one of the largest producers of natural gas in eastern Australia, delivering a reliable energy source to customers in Australia and Asia. We are the largest net contributor of gas supply to Australia's domestic east coast gas market, having provided over 2,100 PJ of gas into the domestic market since the project was sanctioned.

APLNG's pipeline transmission network transports gas from fields to market via various delivery points, including its own downstream facility for LNG export and major retail, commercial and industrial domestic customers.

### **Submission**

APLNG opposes amending the timing for stakeholders to make written submissions during form of regulation reviews as proposed in the draft amendments.

APLNG recommends leaving the wording of the guide, 'at least 15 business days', unchanged, and instead proposes that the AER requests a rule change from the Australian Energy Market Commission, to amend rule 8 of the National Gas Rules. This is because a strict 15 business days submission period, as set out in rule 8, is not long enough for stakeholders, including APLNG, to review the consultation material, seek external advice (as applicable), consult with internal stakeholders, prepare a response and lodge a submission. Longer submission periods will improve the quality of the timely feedback provided to the AER, therefore APLNG considers the AER is best placed to lodge the rule change request.

APLNG has no other comment on the draft amendments to the pipeline regulatory determinations and elections guide.

Should you have any questions or would like to discuss this submission further, please contact Clotilde Bélanger, Principal Regulatory Advisor, at [REDACTED] or Kieran Olsen, Commercial Compliance Manager, at [REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to read 'Manda Goodwin', with a stylized flourish at the end.

**Manda Goodwin**  
General Manager - Commercial  
Australia Pacific LNG Pty Ltd