



3 May 2024

Our Reference: APLNG - COR - 1048892

Karen Krist  
a/General Manager, Market Surveillance  
Australian Energy Regulator  
GPO Box 3131  
Canberra ACT 2601

Via email to: [ContractMarketMonitoring@aer.gov.au](mailto:ContractMarketMonitoring@aer.gov.au)

Dear Ms Krist

Australia Pacific LNG Pty Ltd (**APLNG**) welcomes the opportunity to contribute to the Australian Energy Regulator's (**AER**) consultation on the '*Enhanced Wholesale Market Monitoring and Reporting Guideline*' issues paper.

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, providing over 2,100 PJ of gas into the domestic market since the project was sanctioned.

We appreciate the investment the AER has made to engage with industry as it contemplates the expansion of its wholesale market monitoring and reporting functions to include the wholesale gas markets and the electricity and gas contract markets. APLNG supports the AER's commitment to examine the existing regulatory framework to ensure its new function does not result in duplicative analysis or data requests, but due to the existing excessive regulatory burden, is concerned about the prospect of any additional regulatory reporting.

APLNG urges the AER, as a priority, to seek a consent framework to enable it to receive information from other government bodies however, to the extent the AER is unable to source the information it needs under data-sharing arrangements with those other government entities, regulators and market operators (**government bodies**), APLNG proposes that a single data request is issued on behalf of all relevant government bodies. This would involve aligning the data requests across the issuing government bodies and clearly identifying all the regulations (heads of power) under which the data is being requested *before* data requests are sent to market participants. Such an approach would materially reduce the resource commitment of respondents and ensure that all government bodies are working with the same dataset; thereby reducing the likelihood of conflicting or inconsistent analysis.

APLNG has already engaged with various agencies with related reporting requirements regarding the extent of overlap and duplication in data requests. Given some of the current jurisdictional limitations, it may be appropriate for the Government to establish a group, such as an Inter Departmental Committee, charged with working together to identify opportunities to improve the efficiency of data requests, to minimise the reporting burden and to reduce additional costs.

In addition to this independent submission, APLNG has also reviewed and supports the consultation response submitted by Australian Energy Producers. More regulatory reporting, monitoring and assessment will not alter the domestic gas supply-demand balance forecasted by the Australian Energy Market Operator and Australian Competition and Consumer Commission.

Should you have any queries relating to this submission or would like to meet to discuss our recent experiences, please contact Kieran Olsen, Compliance Manager – APLNG, on 0409 464 351 or via email at [kieran.olsen@aplng.com.au](mailto:kieran.olsen@aplng.com.au) or [compliance@aplng.com.au](mailto:compliance@aplng.com.au). We look forward to ongoing engagement with the AER in this space.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Manda Goodwin', with a long horizontal flourish extending to the right.

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