



7 October 2024

Submission: AER Draft Ring Fencing Decision Guide

APGA welcomes the opportunity to comment on the Australian Energy Regulator's draft ring fencing decision guide (the Guide) for gas pipeline service providers. APGA appreciates the ongoing commitment to consultation by the AER, especially in a period of considerable regulatory change.

Ring fencing obligations are complex, and following changes to the National Gas Rules now also apply to non-scheme pipelines and all covered gases. The AER is required by those changes to the NGR to provide a guideline to assist gas pipeline service operators to better understand ring-fencing obligations, and how to apply for exemptions from certain obligations. APGA welcomes the commitment from the AER to provide a Guideline that clearly sets out these obligations.

APGA considers that the draft Guideline meets the requirements posed by the NGR. However, APGA recommends that the door to regular revision be left open should pipeline service providers find areas for improvement, especially service providers who have not previously been required to comply with ring fencing obligations.

Once again APGA commends the AER on its commitment to consultation with industry on this and other matters.

To discuss any of the above feedback further, please contact me on [REDACTED] or [REDACTED].

Yours sincerely,

[REDACTED]

[REDACTED]
Head of Policy
Australian Pipelines and Gas Association