

# Email submission on the draft decision on the AER Compliance Procedures and Guidelines for gas pipeline service providers from Australian Gas Infrastructure Group (AGIG)

Having participated in the voluntary request for information, we offer the below observations for consideration:

## 1. Template (improvement opportunity)

Having completed the template, we noted "Not Applicable" was not an option under column G.

While the "Service Provider Response" offers free text, column G "compliance with requirement" does not offer a "N/A" option.

Notwithstanding the current guidance material indicates select "yes" where not applicable. It would be pragmatic to offer "N/A" as an option, as selecting "yes" to "compliance is met" is neither a correct or accurate response where the criterion is not applicable.

## 2. Assurance requirements form of statutory declaration section 5

The proposed version provided under 5.2 closely aligns to the declaration used for RINs.

In completing the template, the information in the deals with compliance with obligations/criteria and there is no requirement for actual or estimates to be provided.

We recommend section 5.2 statutory declaration be reviewed, including references to "actual or estimate" be removed to better reflect the structure of the template and annual compliance order requirements. This would include removing the two dot points.

Possibly:

*"I am an officer, for the purposes of the National Gas ([relevant jurisdiction]) Law, of [Name of the Service Provider] in its capacity as a Service Provider (ABN XX XXX XXX XXX) for the purposes of the NGL. I am authorised by [the Service Provider] to make this statutory declaration as part of its response to the General Regulatory Information Order dated [date] (Order) served on [the Service Provider] by the Australian Energy Regulator (AER). I say that the ~~actual~~ information (as defined in the Order) provided in [the Service Provider]'s response to the Order is, to the best of my information, knowledge, and belief: in accordance with the requirements of the Order; and true and accurate. ~~Where it is not possible to provide actual information to comply with the Order, [the Service Provider] has, to the best of my information, knowledge, and belief:~~*

- ~~provided its best estimate of the information in accordance with the requirements of the Order, and~~*
- ~~provided the basis for each estimate, including assumptions made and reasons why the estimate is the best estimate, given the information sought in the Order."~~*