



18 May 2023

Our Reference: APLNG - COR - 1037176

To: Cain Fleckhammer, Director—Gas Pipelines

Delivered via e-mail to: AERgasreform@aer.gov.au

RE: Pipeline Information Disclosure Guidelines – Issues Paper

Australia Pacific LNG Pty Limited (**Australia Pacific LNG**) welcomes the opportunity to provide a response to the Australian Energy Regulator (**AER**) as part of the consultation for the Pipeline Information Disclosure Guidelines (Guidelines) required under Part 10 of the National Gas Rules (**NGR**).

Australia Pacific LNG, based in Queensland, is one of Australia's leading natural gas production companies and East Coast's largest gas producers. It is an incorporated joint venture between ConocoPhillips, Origin Energy and Sinopec. Origin Energy is the upstream operator and ConocoPhillips is the downstream operator of Australia Pacific LNG.

Australia Pacific LNG has an extensive pipeline distribution network for the purposes of transporting gas from fields to market via various delivery points including its own downstream facility for LNG export and servicing major industrial customers in Gladstone. Australia Pacific LNG does not currently provide third-party access to any of its owned and operated pipelines and holds the relevant Category 1 exemptions under Part 10 of the NGR.

Australia Pacific LNG's primary concern is the uncertainty surrounding the obligations for Category 1 exemption holders to develop, maintain and publish documents under the Guidelines. Specifically, the conflict between the obligation to develop and maintain a user access guide (rule 105C(8)) and an interconnection policy (rule 39) while the obligation to publish is not required (rule 39 (c)) as a Category 1 exemption holder. APLNG suggests that Category 1 exemption holders not be required to develop, maintain or publish either a user access guide or interconnection policy and the timeframes for responding to an access request stipulated as part of the access negotiation framework outlined in Part 11 (NGR) requires clarification. Australia Pacific LNG requests this uncertainty be addressed in the upcoming AER compliance bulletin.

Australia Pacific LNG's overarching position is that the Guidelines should balance the regulatory burden placed on service providers with providing users information that will assist in negotiating reasonable terms and conditions of access. Australia Pacific LNG is cognisant of the cumulative impact of regulatory reform and reporting on its business and therefore insists that where practicable, the AER maintain consistency with other reporting obligations and any new requirements are not unnecessarily onerous.

Should you have any questions or would like to discuss this submission further, please contact Amy Greene, Principle Commercial Advisor at [REDACTED]

Yours Sincerely

A black rectangular redaction box covering the signature of Natalie Wallace.

Natalie Wallace
CSG Marketing Manager
Origin Energy on behalf of Australia Pacific LNG Pty Limited