



10 May 2023

Australian Energy Regulator

Submitted via: AERgasreform@aer.gov.au

PIPELINE INFORMATION DISCLOSURE GUIDELINES – ISSUES PAPER

Alinta Energy appreciates the opportunity to provide feedback on the information disclosure guidelines and the proposed approach to implementation.

We make the following recommendations for the AER's consideration:

- 1) Extending the date from which AER will enforce compliance with rule 9 and rule 11 of Schedule 6 of the NGR. We consider that less than two months between the guidelines being published and enforcement of the requirement for service providers to produce service and access information, standing terms and prices (and the price determination method) and actual prices payable, would not be sufficient for providers to prepare their information consistently with the guideline. The holiday period and concurrent gas reforms would exacerbate the time pressure. If the planned guideline (and pricing template) publication date remains in late October, we recommend that the enforcement date is extended to March 2024, allowing enough time after the holiday period for implementation.
- 2) Appropriate guidelines and a fit-for-purpose 'pricing template' for pipelines with category 2 exemptions. We recommend that the guidelines clarify which aspects apply to exempt pipelines and, where appropriate, do not subject these pipelines to the same requirements as non-exempt pipelines. For example, we would suggest that exempt pipelines should be expected to provide less detail than non-exempt pipelines in outlining the method underpinning their standing prices. Requiring the same level of detail could inadvertently require exempt pipelines to provide much of the financial information they are exempted from providing under the NGR.

Thank you for your consideration of our submission. If you would like to discuss this further, please contact me at [REDACTED]

Yours sincerely



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