

17 April 2025

Australian Energy Market Commission (AEMC)

Via AEMC website: www.aemc.gov.au

National Gas Amendment (ECGS Notice of closure for gas infrastructure) Rule

Alinta Energy welcomes the opportunity to provide feedback on the consultation paper regarding the proposed ECGS Notice of closure for gas infrastructure rule.

Alinta Energy is generally supportive of the proposed rule in the interest of proactively formalising notice of closure where this could adversely affect the market, however, we would like to make the following recommendations for the AEMC's consideration.

Exemptions to the reporting requirements

Alinta Energy recommends both Category 1 and Category 2 pipelines, and pipelines captured by 2.10.1 of the NER are exempt from the proposed reporting requirements:

Category 1 and category 2 pipelines

- Existing NGR exemptions (Part 10, Rule 102) from information disclosure requirements apply to Category 1 and Category 2 pipelines, the criteria being:
 - single user pipelines; and
 - pipelines that are not a third-party access pipeline.
- As noted in the consultation paper, the overarching problem the proposed rule change seeks to solve is to enable market participants to “respond in a timely, informed, and efficient manner to any reliability of supply adequacy threats”.
- These types of pipelines have no relevance to supply adequacy – they are an extension of the generating unit for which they provide the supply.
- The inclusion of Category 1 and Category 2 pipelines in the proposed notice of closure requirement would not serve to address the overarching problem identified.

Pipelines under 2.10.1 of the NER

- Under 2.10.1 of the NER a closure date notice period of 42 months is applied to generating units and provided to AEMO.
- Consequently, the proposed notice of closure period of 36 months would serve as a duplicative and redundant reporting requirement for the relevant pipelines to these generating units.
- Pipelines supplying generating units captured under 2.10.1 should thus be exempt from the proposed notice of closure reporting requirements in the NGR to AEMO, as has been indicated by 3.1.1 of the *Rule change proposal*.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this further, please get in touch with Oscar Carlberg at oscar.carlberg@alintaenergy.com.au or on 0409 501 570.

Yours sincerely,

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