



7 August 2025

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

The Australian Pipelines and Gas Association (APGA) represents the owners, operators, designers, constructors and service providers of Australia's pipeline infrastructure. APGA members ensure safe and reliable delivery of over 1,500 PJpa of gas consumed in Australia alongside over 4,500 PJpa of gas for export.

APGA welcomes the opportunity to provide additional feedback to the Australian Energy Market Commission (AEMC) on its Draft Determination to amend the National Gas Rules (NGR) to implement a Notice of Closure requirement for gas transport and delivery infrastructure connected to the East Coast Gas System (ECGS).

- APGA considers it appropriate that the NGR Amendment would create a notice of closure obligation through reporting for the GS00 and VGPR. This would meet the stated objective without imposing additional compliance burden that would come with the Bulletin Board option.
- APGA commends AEMC for recognising a materiality threshold for the notice of closure obligation, by limiting it to facility-level infrastructure. This would include, for example, facility-level compressors such as the nine compressors together making up the Wallumbilla Compressor Station, but not individual compressors on a pipeline.
- From a future-proofing perspective APGA also considers the AEMC's proposal to include LNG Import Terminals, and blended gas distribution and processing facilities appropriate, although these will not provide any significant contributions to system reliability for some time.

APGA thanks the AEMC for its engagement with industry on this matter.

To discuss any of the above feedback further, please contact me on +61 409 489 814 or policy@apga.org.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Catriona Rafael", written over a horizontal line.

CATRIONA RAFAEL
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Australian Pipelines and Gas Association