

# APA Submission to Notice of closure for gas infrastructure Draft Determination

APA Submission

07 August 2025



Anna Collyer  
Chair  
Australian Energy Market Commission  
Level 15, 60 Castlereagh Street  
SYDNEY NSW 2000

**Lodged online**

07 August 2025

**RE: APA Submission to ECGS Notice of closure for gas infrastructure Draft Determination**

Dear Ms Collyer,

Thank you for the opportunity to comment on the East Coast Gas System (ECGS) Notice of Closure for Gas Infrastructure Draft Determination. We appreciate the opportunity to contribute to this important issue

APA is an ASX listed owner, operator, and developer of energy infrastructure assets across Australia. Through a diverse portfolio of assets, we provide energy to customers in every state and territory. As well as an extensive network of natural gas pipelines, we own or have interests in gas storage and generation facilities, electricity transmission networks, and 692 MW of renewable generation and battery storage infrastructure.

We are supportive of the updated notice of closure provisions in the Draft Determination. Additionally, we appreciate the efforts made to minimise the reporting burden by requiring facility operators to report permanent closures at a facility level only through the Gas Statement of Opportunities (GSOO) and Victorian Gas Planning Report, rather than amending the Bulletin Board Medium Term Capacity Outlook (MTCO) obligations.

We do, however, seek clarity on the wording of Rule 135KE(4B):

*Where a GSOO reporting entity identifies new information relating to a reportable closure decision for a facility for which it is the BB reporting entity at any time after responding to a GSOO survey, including:*

- (a) a new reportable closure decision; or*
- (b) a change to the intended date for cessation of supply previously disclosed to AEMO,*

*it must provide the new information to AEMO as soon as practicable.*

The rule 135KE (4B) should clarify the difference between new asset closure and new information on a previously reported asset closure.

We support GSOO reporting entities reporting notice of closure every 12 months, in line with the other information reported through the GSOO. We also agree that if there are changes to closure timelines of facilities that have already been disclosed to AEMO, reporting entities should provide the new information as soon as practicable. We do not support having to report on *new* closures of facilities outside of the GSOO reporting window.



We look forward to continued consultation on the Stage 2 ECGS Reliability Reforms. If you have any questions about our submission, please contact John Skinner on 0435 898 022 or [john.skinner2@apa.com.au](mailto:john.skinner2@apa.com.au).

Regards,



**Natalie Lindsay**  
**General Manager**  
**Economic Regulatory and External Policy**