



7 August 2025

Our Reference: APLNG – COR – 1053026

Ms Nomiky Panayiotakis
Project Leader (GRC0074)
Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

By electronic lodgement: www.aemc.gov.au/contact-us/lodge-submission

Dear Ms Panayiotakis

Re: ECGS Notice of closure for gas infrastructure draft determination

Australia Pacific LNG Pty Limited (APLNG) welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC) *'ECGS notice of closure for gas infrastructure'* rule change request draft determination.

APLNG is an incorporated company and one of the largest producers of natural gas in eastern Australia, delivering a reliable energy source to customers in Australia and Asia. We are the largest net contributor of gas supply to Australia's domestic east coast gas market, providing over 2,300 PJ of gas into the domestic market since the project was sanctioned.

Notification of closure reporting obligation introduced in the GSOO and VGPR

This submission is made in response to the AEMC's draft determination released on 26 June 2025. APLNG considers that the revised position to introduce reporting obligations into the Gas Statement of Opportunities (GSOO) and Victorian Gas Planning Report (VGPR) represents a more balanced and fit-for-purpose approach. We appreciate the AEMC's responsiveness to stakeholder feedback.

As set out in our previous submission, APLNG considers that the real issue is not a lack of information being provided, but of clear guidelines on how permanent facility closure notifications are to be disseminated to the market and other stakeholders. While APLNG maintains that existing reporting requirements are sufficient to capture permanent gas infrastructure closure information, we consider the GSOO and VGPR to be a more appropriate approach than via the Gas Bulletin Board (GBB).

Reliability and supply adequacy should focus on incentivising new domestic supply

APLNG understands that this rule change request has arisen from the broader East Coast Gas System (ECGS) reliability and supply adequacy reform package aimed at enhancing the overall capability of industry and government agencies to anticipate and manage emerging supply risks.

However, there is significant overlap and duplication in the reporting and compliance obligations imposed by regulatory instruments in the east coast gas system. The current extent of duplication across the different market bodies and departmental agencies has created a significant cost and resource burden on market participants and diverts industry resources away from core activities that deliver domestic gas supply outcomes.

In general, APLNG recommends that regulatory data collection and reporting be centralised to one regulatory body, using clearly defined and standardised data requirements to eliminate overlap, improve efficiency and productivity, and align regulatory focus with strategic objectives—namely, enhancing timely investment in gas development, strengthening supply reliability, and supporting broader energy security goals.

Given the broader Commonwealth Government Gas Market Review in progress, APLNG believes all current rule change reviews should be paused and assessed within the broader context of this review. Introducing new reporting obligations in isolation risks exacerbating the already significant compliance burden on market participants and contributing to a duplicative and inefficient regulatory reporting framework.

Thank you for considering our submission. We look forward to engaging further with the AEMC on this important matter. Should you have any queries relating to this submission, please contact Kieran Olsen, Compliance Manager, on 07 3021 3347 or via email at compliance@aplng.com.au

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Simon Game', with a stylized flourish extending to the left.

Simon Game
General Manager Commercial
Australia Pacific LNG Pty Limited