

**AGL Energy Limited**

T 02 9921 2999

agl.com.au

ABN: 74 115 061 375

Level 24, 200 George St
Sydney NSW 2000Locked Bag 14120 MCMC
Melbourne VIC 8001

Australian Energy Market Commission

7 August 2025

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

AGL Energy (**AGL**) welcomes the opportunity to make this submission in response to the AEMC's Draft Rule Determination regarding the east coast gas system (**EGCS**) Notice of closure for gas infrastructure. We support a balanced and practical approach to closure reporting that promotes transparency while recognising operational realities.

About AGL

At AGL, we believe energy makes life better and are passionate about powering the way Australians live, move and work. Proudly Australian for more than 185 years, AGL supplies around 4.5 million energy, telecommunications and Netflix customer services.¹ AGL operates Australia's largest private electricity generation portfolio within the National Electricity Market, comprising coal and gas-fired generation, renewable energy sources such as wind and hydro, batteries and other firming technology, and storage assets. We are building on our history as one of Australia's leading private investors in renewable energy to now lead the business of transition to a lower emission, affordable and smart energy future in line with the goals of our Climate Transition Action Plan. We'll continue to innovate in energy and other essential services to enhance the way Australians live, and to help preserve the world around us for future generations.

We support the use of the existing GSOO and VGPR processes to publish updated closure information at least every 12 months

We support the proposal for closure information to be reported to AEMO through the existing Gas Statement of Opportunities (**GSOO**) and Victorian Gas Planning Report (**VGPR**) survey processes. These mechanisms are familiar to industry participants and other stakeholders, produce public reports which are readily accessible, and would not impose significant additional reporting obligations.

Under the current rules, when AEMO becomes aware of verifiable significant or material new information it must provide an update to the GSOO and VGPR as soon as practicable. These existing provisions will ensure that updates are provided within the year in the event in response to new closure information that is important to the market.

It is unnecessary to introduce new obligations to report closure information outside the established GSOO and VGPR publication cycles

As noted above, under the current rules, AEMO must update the GSOO and VGPR when it becomes aware of verifiable significant or material new information. This will important updates are made within the year, and negates the need to introduce new compliance obligations.

¹ Services to customers number is at 31 December 2024.

The introduction of a requirement to report closure information outside the established GSOO and VGPR publication cycles would create unnecessary complexity and administrative burden. In our view, this would not result in benefits commensurate with the associated costs which would ultimately be paid by energy consumers.

Flexibility around minimum notice periods is critical

Should the AEMC decide to include a minimum notice period for reportable closure decisions, it is essential that compliance with this requirement be subject to a “where practical” qualification. This would allow for flexibility in cases where closure decisions are made within the proposed 36-month window. As highlighted in our submission to the consultation process, it may be necessary to make an early closure decision in response to unforeseen material changes in circumstances, such as a sudden deterioration in commercial viability.

We would be happy to discuss our submission in more detail with the AEMC if this would be useful. Please contact Warren Vosper at wvosper@agl.com.au.

Yours sincerely,

Chris Streets

Senior Manager
Policy & Wholesale Markets Regulation