

APA Submission to Projected Assessment of System Adequacy Draft Determination

APA Submission

28 August 2025



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

Lodged online

28 August 2025

RE: APA Submission to ECGS Projected Assessment of System Adequacy Draft Determination

Dear Ms Collyer,

Thank you for the opportunity to comment on the East Coast Gas System (ECGS) Projected Assessment of System Adequacy (PASA) Draft Determination. We appreciate the opportunity to contribute to these important issues and support measures that aim to increase the accuracy and reliability of information reported to AEMO.

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 appreciative of the AEMC's constructive engagement in this process and thank the Commission for taking on board stakeholder feedback from the initial consultation round and reflecting this in the draft determination. While we have identified some high-level implications of the draft rules, we are still assessing the full operational impact, and there may be unforeseen consequences arising. In particular, we are concerned about the potential duplication with existing obligations and the risk of increased operational burden.

We will provide further feedback once we have completed our internal review. If you have any questions about our submission, please contact John Skinner on 0435 898 022 or john.skinner2@apa.com.au.

Regards,



Natalie Lindsay
General Manager
Economic Regulatory and External Policy