

AEMC NATIONAL GAS AMENDMENT (EXTENSION OF THE DWGM DANDENONG LNG INTERIM ARRANGEMENTS) RULE 2025 DRAFT DETERMINATION (GRC0078)

18 SEPTEMBER 2025

The Energy Users' Association of Australia (EUAA) is the peak body representing Australian commercial and industrial energy users. Our members are the engine room of the Australian economy, producing many of the products that households and business use every day including bricks, glass, steel, aluminium, paper, food and beverages. Combined, our members employ over 1 million Australians, pay billions in energy bills every year and in many cases are exposed to the fluctuations and challenges of international trade.

EUAA members are focussed on making products that meet their own customers' requirements where energy is just one input to the process albeit a critical one. Their expectation is that the energy industry continues to provide energy services that are fit for purpose and consistent with the National Gas Objectives (NGO) so that our members can continue to provide a fit for purpose product for their customers.

Thank you for the opportunity to make a submission under the National Gas Amendment (Extension of the DWGM Dandenong LNG Interim Arrangements) Rule 2025 Draft Determination (Draft Determination).

The EUAA supports proposed rule changes where evidence points to an issue and the proposed rule change clearly leads to improved efficiency of markets and/or improved system security and where the costs and risks are appropriately allocated to those best able to manage them. The AEMC has provided clear evidence identifying the issues with the Dandenong LNG plant in the Draft Determination and has developed appropriate responses that correctly allocate costs and risks.

The EUAA supports all of the AEMC's Draft Determination.

We agree with the AEMC that:

- "Gas consumers should not bear the risk of long-term capital investments in unregulated assets".
- This rule change is not the right place to provide the necessary investment certainty to the current owners of the Dandenong LNG facility to re-invest and that investment certainty should be facilitated through other mechanisms.
- AEMO is not the appropriate party to manage the risk of long-term investments in unregulated assets and therefore agree with the deletion of rule 282(2)(c)(i) that currently permits variations that are reasonably necessary for safety and reliability to be passed through to AEMO and thus consumers.
- The proposed changes to the Gas Bulletin Board reporting obligations in parts 18 and 19 of the NGR to capture the Dandenong liquefaction facility, LNG storage and vaporisation facility as a single facility thereby extending APA's reporting requirements to BOC.
- These Gas Bulletin Board reporting obligations will be enduring and will not expire at the end of the other interim arrangements, which is a better outcome than we had suggested in our previous submission.

We agree with the AEMC that the draft rule changes in the Draft Determination will:

- Lead to a more efficient allocation of the Dandenong storage facility through improved transparency.
- Will provide the gas industry and consumers with advanced notification in a timely fashion should operations of the liquefaction facilities be offline or decommissioned, including refilling times for the LNG storage facility.
- Protect consumers and AEMO from funding maintenance and/or upgrades of registered unregulated gas market infrastructure.

The EUAA welcomes further discussions around the issues raised in this submission.

Do not hesitate to be in contact with EUAA Policy Manager Dr Leigh Clemow, should you have any questions.



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