

NATURAL GAS AMENDMENT (UPDATING THE REGULATORY FRAMEWORK FOR GAS CONNECTIONS) RULE (GRC0085)

03 DECEMBER 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 NEO and NGO so that our members can continue to provide a fit for purpose product for their customers.

We make the following brief comments on the Commissions Draft Determination on this Justice and Equity Centre rule change.

We support the Commission's decision to make a more preferable rule change to introduce a new framework for customer initiated gas abolishment services in the National Gas Rules. We agree with the four of the features of the proposed framework:

- outcomes-based definitions,
- customers choosing to abolish pays the prudent and efficient costs of the abolishment and
- covers all customers seeking abolishment services
- the decision to not mandate contestability, leaving it up to jurisdictions to determine if they wish to introduce it

with these changes to all scheme distribution networks and to non-scheme pipelines where jurisdictions allow. As we noted in our original submission on this matter¹, we are not convinced that contestability has a clear net consumer benefit², saying:

"We have doubts about benefits to consumers of the JEC proposal for contestability in the provision of permanent disconnection services and remediation services. We understand the current network approach is to undertake a competitive tender for the provision of these services. The costs that result from this tender process are then assessed as part of AA opex by the AER for prudence and efficiency. This seems to be a much more efficient way of achieving a competitive cost outcome than the network having to accredit a number of providers who then compete on price."

¹ https://www.aemc.gov.au/sites/default/files/2025-11/5_euaa_grc0085_cp_submission.pdf

² We note the Draft (p.4 and 42) says that 'consumer groups supported contestability'.

We note that the Draft Determination would allow distributors to identify the safety and technical requirements that must be complied with if a jurisdiction wishes to implement contestability. It is also recognised that different jurisdictions may have different safety requirements.

We think that the rules should begin as soon as possible and are happy to be guided by gas networks views on whether the Commission's proposal for six months after the final determination (around August 2026) is a practical timetable.

Do not hesitate to be in contact should you wish to discuss anything further.



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