



17 April 2025

Our Reference: APLNG – COR – 1052217

Stephanie Jolly
Executive General Manager, Policy
Australian Energy Regulator
GPO Box 3130
Canberra ACT 2601

Via email to: AERexemptions@aer.gov.au

Dear Ms Jolly

Australia Pacific LNG Pty Limited (APLNG) welcomes the opportunity to contribute to the Australian Energy Regulator's (AER) consultation process on its *'Review of the AER exemptions framework for embedded networks: Draft decision, incorporating Notice of Draft Instruments'* (the draft decision).

APLNG is one of the largest producers of natural gas in eastern Australia, delivering a reliable energy source to customers in Australia and Asia. It is an incorporated joint venture between ConocoPhillips, Origin Energy and Sinopec. The APLNG project currently holds two registrable network exemptions for private embedded networks located in the Surat and Bowen basins and a registrable retail exemption for the Spring Gully gas field.

We note the changes proposed in the AER's draft decision and guidelines do not affect our eligibility to remain on these network and retail exemptions. However, our exemptions will now be subject to additional conditions, including:

- Network Condition 1.19 and Retail Condition 28, which require an exempt network service provider (NSP) and an exempt seller to notify the AER within 20 business days of any changes to the contact details of their authorised representative
- Network Condition 2.4, which requires an exempt NSP to, at their own expense, repair or replace a deficient child metering installation (except in certain circumstances) and install a compliant child meter where the customer has no child meter.

APLNG has reviewed the proposed new conditions and does not have any significant concerns. This submission therefore focuses on aspects of the draft guidelines that would benefit from additional clarity. Specifically, we seek guidance from the AER on:

- the application of the Embedded Network Manager (ENM) conditions to sites located in regional Queensland. The AER has stated on page 70 of the *'Network Exemptions Guideline'* that the *'appointment of an ENM is deferred in regional Queensland'*. However, the only ENM-related condition that explicitly mentions the exclusion of regional Queensland sites is Condition 6.1. Providing greater transparency on the conditions that do not apply to regional Queensland sites would help exempt NSPs better understand their obligations.
- the notification requirements for a change of ownership for a registrable retail exemption. Pages 14 and 17 of the draft *'Retail Exempt Selling Guideline'* appear to require both the new and old owners of a site to notify the AER of a change of ownership. APLNG considers that it would be more efficient for the AER to receive a notice from the new owner only.

- the notification requirements for when an exempt NSP or exempt seller plans to cease operations or on-selling due to a change of ownership. Specifically, it is not clear whether the existing exempt NSP or exempt seller needs to notify the AER of the cessation or if the change of ownership notification from the new owner will suffice.

Thank you for considering our feedback on the draft decision and guidelines. Should you have any queries relating to this submission, please contact Kieran Olsen, Compliance Manager, on [REDACTED] or via email at [REDACTED]

Yours sincerely



Manda Goodwin
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Australia Pacific LNG Pty Limited