



**ACT**  
Government

City and Environment

Mr Arek Gulbengoglu  
General Manager, Network Expenditure  
Australian Energy Regulator  
Email: [aergasresets2026-31@aer.gov.au](mailto:aergasresets2026-31@aer.gov.au)

Our ref: 25/0307774

Dear Mr Gulbengoglu

**ACT Technical Regulator public submission on Evoenergy's 2026-31 Access Arrangements**

Thank you for the opportunity to comment on Evoenergy's Access Arrangements Proposal for 2026-31.

I am writing in my capacity as the Head of Access Canberra, exercising the functions of the Technical Regulator under the *Utilities (Technical Regulation) Act 2014* with responsibility for ensuring regulated utility services in the ACT are delivered safely, reliably, and in accordance with technical standards.

I understand Evoenergy has proposed a user-pays approach to disconnection of gas services at single residences in the ACT, giving consideration to equity and not cross-subsidising the cost of permanent disconnections across all gas users. This means the cost of permanent disconnections starts at \$747, whereas the cost of temporary connection starts at \$172 – a difference which it is understood may encourage homeowners to opt for temporary disconnections over permanent, leaving an active consumer service in the ground in properties where this occurs.

While from a safety perspective it is preferable for all non-consuming gas services to be permanently disconnected, an 'As Low as Reasonably Practicable' (ALARP) Assessment of non-consuming gas services for single residential dwellings has been undertaken by Jemena Asset Management, on behalf of Evoenergy, following identification of an intermediate risk from these services in a formal safety assessment process. The assessment found that there is not a substantive difference in the risk between most permanent and temporary disconnections in the shorter term, and that focused abolishment during changes in residential ownership offers a cost-effective way to mitigate risks with minimal resources required.

The established policy position in the ACT, with active work being undertaken to put in place measures to progressively decommission the gas network by 2045, is a contributing factor towards the risk remaining intermediate in the shorter term (i.e. within 11 years).

The Utilities Technical Regulation Team (UTR) has reviewed the assessment against the requirements under the *Gas Safety and Network Operation Code 2021* and *AS/NZS 4645.1 Gas distribution network management*. While the Technical Regulator's role does not specifically



extend to approval of this assessment, I can provide the following assurance based on UTR's review:

- the ALARP review appears to have been carried out in accordance with AS 4645.1 and on that basis accords with Evoenergy's licence, the *Utilities (Technical Regulation) Act 2014* and underlying technical codes;
- the assumptions in the review appear to be reasonable; and
- the proposed risk treatments appear to be proportionate and reasonable.

UTR has requested that Evoenergy provide annual submissions of the ALARP for non-consuming meters from 2026 onwards to enable technical review of any emerging issues.

If a future annual ALARP review identifies that the risk has increased from intermediate to high during the current Access Arrangement period (2026–2031), I have several powers under the *Utilities (Technical Regulation) Act 2014* that can be exercised. These include issuing warning notices and directions to prompt corrective action and ensure compliance with the relevant standards. In such a scenario, the Utilities Technical Regulation Team would work proactively with Evoenergy to support the timely restoration of compliance.

Should you have any questions regarding this letter please contact the Utilities Technical Regulation team on [REDACTED]

Yours sincerely

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Josh Rynehart  
Head of Access Canberra  
11 August 2025