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Our Ref: QT03982-2025

Ms Clare Savage
Chair
Australian Energy Regulator

Email: [REDACTED] and [REDACTED]

Dear Ms Savage

Thank you for your letter of 20 August 2025 about the classification of the Roma North (Mimas) Gas Pipeline under the National Gas Law (NGL).

I am advised the Roma North (Mimas) Gas Pipeline was constructed on petroleum lease #1024 issued under the *Petroleum Act 1923* (Queensland Petroleum Act). I am further advised that this pipeline does not have a Pipeline Licence under the *Queensland Petroleum and Gas (Production and Safety) Act 2004* (Queensland P&G Act).

The petroleum lease does not classify the pipeline as transmission or distribution. Consequently, the pipeline requires classification by the Australian Energy Regulator (AER) in accordance with the definitions provided under the NGL.

I understand the definitions of distribution and transmission pipelines under the NGL are as follows:

- **Transmission pipeline** means a pipeline that:
 - (a) is classified as a transmission pipeline under a licence or authorisation granted in relation to the pipeline under jurisdictional gas legislation; or
 - (b) if the licence or authorisation mentioned in paragraph (a) does not include a classification of the pipeline – is classified by the AER as a transmission pipeline and includes a pipeline that is reclassified by the AER as a transmission pipeline.
- **Distribution pipeline** means a pipeline that:
 - (a) is classified as a distribution pipeline under a licence or authorisation granted in relation to the pipeline under jurisdictional gas legislation; or
 - (b) if the licence or authorisation mentioned in paragraph (a) does not include a classification of the pipeline – is classified by the AER as a distribution pipeline and includes a pipeline that is reclassified by the AER as a distribution pipeline.

As noted in previous correspondence, under the Queensland P&G Act, the term "transmission" does not appear with respect to pipelines, as this terminology was removed to align Queensland's legislation with other states. Nonetheless, the Roma North (Mimas) Pipeline is a pipeline constructed on a petroleum lease and is therefore regarded as operating plant under section 670(2)(d) of the Queensland P&G Act, as it is authorised under a petroleum authority (a petroleum lease being a petroleum authority).

In contrast, distribution pipelines are also regarded as operating plant under section 670(2)(e) of the Queensland P&G Act. However, distribution pipelines do not have a petroleum authority. Therefore, under the Queensland P&G Act, the Roma North (Mimas) Gas Pipeline cannot be classified as a distribution pipeline, as it has been issued with a petroleum authority (a petroleum lease).

Based on the use and characteristics of the Roma North (Mimas) Gas Pipeline, I understand that it would be categorised as a transmission pipeline under the NGL.

If you require any further information, please contact Kellie Reeves, Deputy Under Treasurer by email at [REDACTED].

Yours sincerely

[REDACTED]
DAVID JANETZKI MP
Treasurer
Minister for Energy
Minister for Home Ownership

22 / 11 / 2025