Gas pipeline classification – Roma North (Mimas) Gas Pipeline

Final decision

February 2026

AUSTRALIAN ENERGY REGULATOR

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Glossary

Term	Definition
AEDT	Australian Eastern Daylight Savings Time
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
EGP	Eastern Gas Pipeline
GBB	Gas Bulletin Board
GLNG	GLNG Operations Pty Ltd
kPa	Kilopascals
MPa	Megapascals
MPa(g)	Megapascals relative to atmospheric pressure
NCC	National Competition Council
NGL	National Gas Law
NGO	National Gas Objective
NGR	National Gas Rules
NRMMRRD	The Queensland Department of Natural Resources and Mines, Manufacturing, and Regional and Rural Development
RNMGP	Roma North (Mimas) Gas Pipeline
Stuart	Stuart Petroleum Cooper Basin Gas Pty Ltd
Stuart's application	Stuart Petroleum Cooper Basin Gas Pty Ltd, *Application for a classification of Roma North (Mimas) Gas Pipeline*, 23 July 2025
STTM	Short-Term Trading Market

1. Summary

The Australian Energy Regulator's (AER's) final decision is to classify the Roma North (Mimas) Gas Pipeline (RNMGP) as a transmission pipeline. This classification takes effect from 10 February 2026.

The RNMGP is an approximately 1-kilometre (km) gas pipeline, which connects the Roma North (Mimas) Gas Processing Facility to GLNG Operations Pty Ltd's (GLNG's) Comet Ridge to Wallumbilla Pipeline and Jemena's Queensland Gas Pipeline.

The RNMGP is an authorised activity carried out under a petroleum lease granted pursuant to the *Petroleum and Gas (Production and Safety) Act 2004* (Qld). The petroleum lease does not include a pipeline classification. As such, Stuart Petroleum Cooper Basin Gas Pty Ltd (Stuart) must apply to the AER for a pipeline classification as either a transmission or distribution pipeline. On 23 July 2025, Stuart submitted an application to the AER, seeking a transmission pipeline classification for the RNMGP.

Having regard to the pipeline classification criterion, the characteristics of the pipeline set out in section 13 of the National Gas Law (NGL), and the National Gas Objective (NGO), we consider that the characteristics of the RNMGP are consistent with those of a transmission pipeline and that the primary function of the RNMGP is to convey gas to a market. In addition, we consider the NGO is best promoted through the consistent regulatory treatment of pipelines and that a transmission classification for the RNMGP will support achieving the NGO by allowing its registration to the Gas Bulletin Board (GBB) and the Short-Term Trading Market (STTM). This will benefit consumers by facilitating increased transparency in the gas market.

In making our pipeline classification decision, we consulted with the Queensland Treasurer, the Queensland Department of Natural Resources and Mines, Manufacturing, and Regional and Rural Development (NRMMRRD), the Australian Energy Market Operator (AEMO) and the Australian Energy Market Commission (AEMC) in accordance with rule 29F(3) of the National Gas Rules (NGR).

We also invited written submissions on the draft decision by 3 February 2026. We did not receive any written submissions during the consultation period.

2. Application

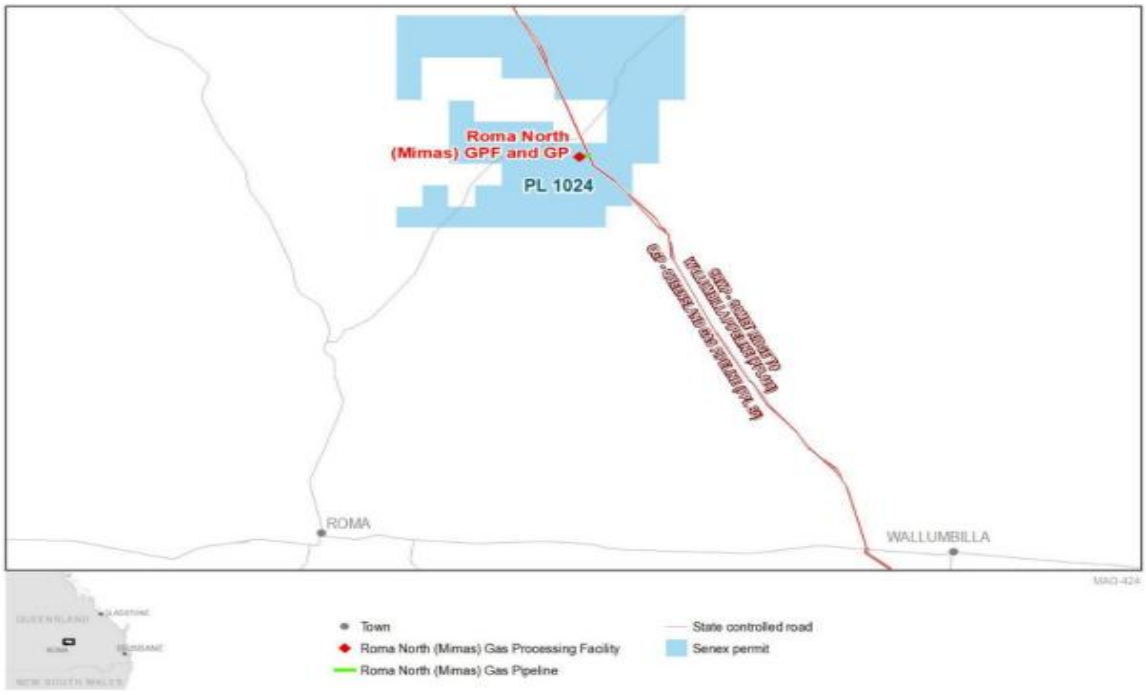
On 23 July 2025, Stuart submitted a pipeline classification application for the RNMGP to the AER in accordance with section 117 of the NGL. Stuart sought a transmission pipeline classification for the RNMGP.[1]

The RNMGP is an authorised activity carried out under petroleum lease PL1024 granted pursuant to the *Petroleum and Gas (Production and Safety) Act 2004* (Qld). The petroleum lease does not include a pipeline classification; therefore, Stuart must apply to the AER for a pipeline classification as either a transmission or distribution pipeline.[2] The classification application must be made in accordance with rule 29D of the NGR.

In its classification application, Stuart stated that the primary function of the RNMGP is to convey gas to a market. Stuart described the RNMGP as a short (approximately 1 km in length) lateral pipeline which will be used to convey natural gas from its Roma North (Mimas) Gas Processing Facility to GLNG's Comet Ridge to Wallumbilla Pipeline and Jemena's Queensland Gas Pipeline (Figure 1). The RNMGP is a high-pressure pipeline operating at up to 15.3 MPa(g) and has a nominal diameter of 200 mm (DN200). The pipeline has a linear configuration with one injection point and two delivery points.[3]

The RNMGP was commissioned on 22 July 2025.

Figure 1 – RNMGP map



Source: Stuart's application.

1 Stuart Petroleum Cooper Basin Gas Pty Ltd, *Application for a classification of Roma North (Mimas) Gas Pipeline,* 23 July 2025 (Stuart's application).

2 NGL, s 117.

3 Stuart's application.

3. Regulatory framework for a classification decision

3.1 What is a pipeline classification?

Under the NGL and NGR, all scheme and non-scheme pipelines must be classified as either a distribution or transmission pipeline. The primary function of a transmission pipeline is to convey gas to a market,[4] whereas the primary function of a distribution pipeline is to reticulate gas within a market.[5]

In most cases, the pipeline licensing authority will classify the pipeline. However, if a newly commissioned pipeline is not classified as a transmission or distribution pipeline under a licence or authorisation under jurisdictional gas legislation, the service provider must apply to the AER for the pipeline to be classified. This application must be made within 20 business days after the commissioning of the pipeline.[6]

In general, transmission and distribution pipelines have similar obligations under the NGL and NGR. However, there are different requirements for the types of information that a service provider must publish under Part 10 of the NGR.

Further, unlike distribution pipelines, transmission pipelines are required to report information to the GBB and for the STTM, a wholesale gas market operated by AEMO. Classifying a pipeline as a transmission pipeline can provide greater flexibility for any future expansion to accommodate evolving market demands. For example, the services offered by transmission pipelines can be more easily adapted if users require additional capacity or if there is a need to facilitate additional transportation arrangements such as third-party access.

In comparison, distribution pipelines have slightly less regulatory and administrative requirements than transmission pipelines. Service providers of distribution pipelines are not obligated to report GBB and STTM information to AEMO. In addition, the services they provide are generally standard services such as injecting gas into a pipeline, conveying gas to supply points and withdrawing gas from a pipeline.

Service providers of distribution pipelines are also subject to obligations under Part 12A (gas connection for retail customers) and Part 21 (retail support obligations between distributors and retailers) of the NGR.

Whether a pipeline is classified as a transmission or distribution pipeline does not affect the form of regulation that applies to a pipeline (i.e. whether it is a scheme or non-scheme pipeline).

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4 NGL, s 13(1)(b).

5 NGL, s 13(1)(a).

6 NGL, ss 117(1) and 117(2).

3.2 Assessment approach for classification applications

When making a classification decision under the NGL, we must have regard to:[7]

- the NGO, and
- the pipeline classification criterion.

The NGO is to promote efficient investment in, and efficient operation and use of, covered gas services for the long-term interests of consumers of covered gas with respect to—

(a) the price, quality, safety, reliability and security of supply of covered gas; and

(b) the achievement of targets set by a participating jurisdiction—

(i) for reducing Australia's greenhouse gas emissions; or

(ii) that are likely to contribute to reducing Australia's greenhouse gas emissions.[8]

In making this final classification decision, we have had regard to the NGO by considering how the classification will likely affect the efficiency of pipeline access, the operation of gas markets, the rights of third parties and the achievement of relevant emissions reduction targets.

The pipeline classification criterion requires us to consider whether the primary function of a pipeline is to:

- reticulate gas within a market—which is the primary function of a distribution pipeline,[9] or
- convey gas to a market—which is the primary function of a transmission pipeline.[10]

When determining the primary function of the pipeline, we must also have regard to whether the characteristics of the pipeline are those of a transmission pipeline or a distribution pipeline.[11] The characteristics of distribution and transmission pipelines are outlined in Table 1.[12]

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7 NGL, s 119(1).

8 NGL, s 23.

9 NGL, s 13(1)(a).

10 NGL, s 13(1)(b).

11 NGL, s 13(2).

12 AER, *Pipeline Regulatory Determinations and Elections Guide: Final Guide,* July 2024, p 37 (Regulatory Determinations Guide). See also, NGL, ss 13(2)(c) to 13(2)(h).

Table 1 – Characteristics of distribution and transmission pipelines

Characteristic	Distribution Pipelines	Transmission Pipelines
Pipeline diameter	• Smaller diameter than transmission pipelines	• Larger diameter, than distribution pipelines
Pipeline pressure	• Lower pressure	• Higher pressure to optimise shipping capacity
Area served	• Operates in a network to deliver gas from points along transmission pipelines to industrial customers, and from gate stations to customers in cities and towns	• Operates in one or more separate markets • Gas is usually transported over long distances from processing or storage facilities to domestic markets
Pipeline configuration	• Usually has more injection points • Generally dendritic in nature	• Usually has less injection points • Injection points are discrete and serve a smaller area • Generally linear in nature

In addition to the general characteristics set out in Table 1, we must also have regard to the characteristics and classification of old scheme pipelines,[13] the characteristics of pipelines classified under the NGL or specified in the NGR, and the type of pipeline licence or authorisation granted to the pipeline.[14]

13 That is, scheme pipelines under the *Gas Pipelines Access (South Australia) Act 1997*.

14 NGL, ss 13(2)(a), 13(2)(b), 13(2)(c) and 13(2)(i).

4. Assessment of the classification application for the RNMGP

4.1 Pipeline characteristics

In its classification application, Stuart stated that the primary function of the RNMGP is to convey natural gas to a market from Stuart's Roma North (Mimas) Gas Processing Facility to GLNG's Comet Ridge to Wallumbilla Pipeline (CRWP) and Jemena's Queensland Gas Pipeline (QGP). Stuart considered that the RNMGP's primary function as a transmission pipeline is further supported by the characteristics of the pipeline.[15]

On 22 July 2025, the AER granted Stuart a statutory Category 1 exemption under Part 10 of the NGR in respect of the RNMGP, as it is not a third-party access pipeline, until 22 July 2030. This means that Stuart is exempt from publishing any Part 10 information under the NGR in relation to the RNMGP. This includes information such as service and access information, standing terms, financial information, historical demand information and a cost allocation methodology and actual prices payable information. This exemption does not impact this classification decision but provides some context on the pipeline's expected usage.

4.2 Our assessment

4.2.1 Reasons for decision

Pipeline classification criterion under section 13 of the NGL

We have considered the pipeline classification criterion and the characteristics set out in section 13 of the NGL; our view is that the RNMGP's characteristics are consistent with those of a transmission pipeline and its primary function is to convey gas to a market.

Table 2 outlines Stuart's views and our assessment against the classification criterion and pipeline characteristics that are relevant to this classification decision.[16]

In its application, Stuart did not address each pipeline characteristic set out in section 13(2) of the NGL. However, we consider the information provided was sufficient to make our final decision.

Table 2 – The AER's assessment against the pipeline classification criterion

NGL section 13 criterion	Stuart's views	Summary of the AER's assessment
Section 13(1) *The pipeline classification criterion*	The RNMGP connects to and is part of the network of transmission pipelines which	We consider that the RNMGP's primary function is to convey gas to a market because it transports gas from the

15 Stuart application, pp 2-3.

16 As outlined in Stuart's application.

NGL section 13 criterion	Stuart's views	Summary of the AER's assessment
	convey gas to the east coast gas markets. The RNMGP connects Stuart's Roma North (Mimas) Gas Processing Facility to GLNG's Comet Ridge to Wallumbilla Pipeline and Jemena's Queensland Gas Pipeline, which are transmission pipelines.	processing facility to transmission pipelines that in turn convey gas to gas markets.
Section 13(2) *Without limiting section 13(1), in determining the primary function of the pipeline, regard must also be had to whether the characteristics of the pipeline are those of a transmission pipeline or distribution pipeline, having regard to:*[17]		
Section 13(2)(a): *the characteristics and classification of, as the case requires, an old scheme transmission pipeline or an old scheme distribution pipeline*	Stuart did not address this classification characteristic in its classification application.	We identified one classification decision made under the former Gas Code, which was referred to in the National Competition Council's (NCC's) Eastern Gas Pipeline (EGP) final coverage decision.[18] Any classification decisions under the former Gas Code were based on a classification criterion and characteristics that were largely similar to the current criterion in section 13 of the NGL. The EGP, a transmission pipeline, operates at pressures between 3 and 16.55 MPa, and has a diameter ranging from 209 mm to 457 mm. In comparison, the RNMGP has a diameter of approximately 200 mm and operates at a pressure of up to 15.3 MPa(g). Based on these observations, we consider that the RNMGP's characteristics best align with the characteristics and classification of old scheme transmission pipelines.
Section 13(2)(b): *the characteristics of, as the case requires, a transmission pipeline or*	The RNMGP does not reticulate gas within a market (which is the primary function	We have considered the characteristics of: • existing distribution and transmission pipelines

[17] In 2010, the National Competition Council (NCC) provided clarification on the phrase 'without limiting section 13(1)' in section 13(2) of the NGL. The NCC's view was that this phrase indicates that the primary function test is the main basis for making a classification decision. The factors in section 13(2) are informative, but not determinative, for the classification test. See NCC, *Coverage, revocation and classification of pipelines guide*, February 2010. The NGL was introduced in 2008.

[18] NCC, *Final Recommendation. Application for Coverage of Eastern Gas Pipeline (Longford to Sydney)*, June 2000.

NGL section 13 criterion	Stuart's views	Summary of the AER's assessment
a distribution pipeline classified under the NGL	of a distribution pipeline (s13(1) of the NGL)). The characteristics of the RNMGP are those of a transmission pipeline.	• the NCC's reclassification of the Northern Trunk and Southern Trunk pipelines[19] • the AER's classification of Kurri Kurri Lateral the Pipeline[20] • the AER's classification of the Atlas to Reedy Creek Pipeline.[21] We consider that the RNMGP's characteristics are more closely aligned with pipelines that are classified as transmission pipelines. In particular, the RNMGP operates at a higher pressure and has a linear configuration. While it transports gas over a relatively short distance, it transports gas from a production facility to transmission pipelines consistent with other transmission laterals.
Section 13(2)(c): *the characteristics and classification of pipelines specified in the NGR (if any)*	Stuart did not specifically address this classification characteristic in its application.	The NGR do not provide such specifications.
Section 13(2)(d): *the diameter of the pipeline*	The RNMGP has a diameter of approximately 200 mm.	Transmission pipelines generally have larger diameters (from approximately 150 mm and above) than distribution pipelines (typically less than 150 mm). The diameter of the RNMGP (approximately 200 mm) is more consistent with the characteristics of a transmission pipeline.
Section 13(2)(e): *the pressure at which the pipeline is, or will be, designed to operate*	The RNMGP is a high-pressure transmission pipeline, which operates at up to 15.3 MPa(g).	Transmission pipelines typically operate at higher pressures over 1050 kPa (1.05 MPa). Distribution pipelines typically operate at lower pressure under 1050 kPa, other than some distribution mains. The Mortlake Pipeline and the Atlas to Reedy Creek Pipeline are comparable to the RNMGP, which both at up to 15.3 MPa(g). Therefore, we consider that the RNMGP's pressure characteristics are more consistent with those of a transmission pipeline.

19 NCC, *Jemena Pipeline Reclassification—final decision*, June 2009.

20 AER, *Gas pipeline classification decision—Kurri Kurri Lateral Pipeline—final decision*, May 2025

21 AER, *Gas pipeline classification decision—Atlas to Reedy Creek Pipeline—final decision*, August 2025.

NGL section 13 criterion	Stuart's views	Summary of the AER's assessment
Section 13(2)(f): *the number of points at which gas can, or will be, injected into the pipeline*	Gas is injected into the RNMGP at a single point at the Roma North (Mimas) Gas Processing Facility.	Transmission pipelines usually have fewer injection points than distribution pipelines. The RNMGP has one injection point, which is consistent with the conveying of gas to a market, rather than its reticulation within a market.
Section 13(2)(g): *the extent of the area served or to be served by the pipeline*	The RNMGP connects the Roma North (Mimas) Gas Processing Facility to delivery points on two transmission pipelines.	Transmission pipelines are generally long pipelines that cover a narrow area with a small number of discrete points. Conversely, distribution pipelines usually cover a broader area. The RNMGP is a very short pipeline. However, it serves a very limited area, transporting gas from the Roma North (Mimas) Gas Processing Facility to a delivery point on each of the Comet Ridge to Wallumbilla Pipeline and the Queensland Gas Pipeline. This configuration is more consistent with a transmission pipeline that conveys gas from an injection point to a point of delivery.
Section 13(2)(h): *the pipeline's linear or dendritic configuration*	The RNMGP has a linear configuration and is approximately 1 km in length.	Transmission pipelines generally have a linear configuration unlike distribution pipelines that have a dendritic configuration. The RNMGP has a linear configuration and operates in a linear manner that is consistent with a transmission pipeline.
Section 13(2)(i): the *type of pipeline licence or authorisation that has been obtained in respect of the pipeline under jurisdictional gas legislation*	The RNMGP is an authorised activity carried out under a petroleum lease granted pursuant to the *Petroleum and Gas (Production and Safety) Act 2004* (Qld). It does not include a pipeline classification.	The RNMGP has not been issued a pipeline licence. Instead, it is an authorised activity carried out under a petroleum lease granted pursuant to the *Petroleum and Gas (Production and Safety) Act 2004* (Qld). A petroleum lease provides for the key authorised activities including exploration, production and storage activities, and the construction and operation of petroleum pipelines in the area of the lease.[22] While not determinative, we consider that a pipeline operating under a petroleum lease is more likely to have the purpose of conveying gas to a market.

22 *Petroleum and Gas (Production and Safety) Act 2004* (Qld), ss. 109 and 110.

Consideration of the NGO

In making our classification decision, we must also have regard to the NGO and consider whether making the decision will align with it. As outlined in our Regulatory Determinations Guide, we will consider whether making the classification decision is likely to impact the efficiency of pipeline access, the operation of gas markets, the rights of third parties and the achievement of relevant emissions reduction targets.

Classification of the RNMGP as a transmission pipeline means it will align it with its registration on the GBB and the STTM.[23] These tools can potentially facilitate access for pipeline users and improve the operation of gas markets by providing additional capacity to bring gas to a market or to trade gas. This, in turn, will improve decision-making and efficiency in the market and promote the long-term interests of consumers.

We consider that a decision to classify the RNMGP as either a transmission or distribution pipeline is unlikely to have an impact on the achievement of jurisdictional emissions reduction targets. This is because the classification decision is not expected to significantly impact the use of the RNMGP's services. Therefore, we do not consider the emissions element in the NGO to be material to this final decision.

4.3 Stakeholder consultation and views

4.3.1 Submissions received prior to publishing our draft decision

Under rule 29F(3) of the NGR, the AER must consult with certain stakeholders prior to making a classification decision.

We consulted with the Queensland Treasurer (being the relevant Minister of the participating jurisdiction), the NRMMRRD (being the jurisdictional safety and technical regulator), AEMO and the AEMC.

A summary of stakeholders' views is set out below.

The Queensland Treasurer, who administers the *National Gas (Queensland) Act 2008*, considers the RNMGP to be a transmission pipeline.[24] The Treasurer submitted that the RNMGP doesn't have a pipeline licence issued under the *Petroleum and Gas (Production and Safety) Act 2004* (Qld). Instead, the RNMGP is constructed on a petroleum lease under the *Petroleum Act 1923* (Queensland Petroleum Act) and it is authorised under a petroleum authority (a pipeline licence being a petroleum authority). This only applies to transmission pipelines as distribution pipelines do not have a petroleum authority. Therefore, under the *Petroleum and Gas (Production and Safety) Act 2004* (Qld), the RNMGP cannot be classified as a distribution pipeline. The Treasurer further submitted that the use of the RNMGP and its characteristics are consistent with those of a transmission pipeline under the NGL.

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23 AEMO, *Submission to the AER on the AER's draft classification decision for the RNMGP*, 29 August 2025.

24 Queensland Treasurer, *Submission to the AER on the AER's draft classification decision for the RNMGP*, 22 November 2025.

NRMMRRD's view was that the RNMGP should be classified as a transmission pipeline. NRMMRRD submitted that the RNMGP is used to convey natural gas from the Roma North (Mimas) Gas Processing Facility to the Comet Ridge to Wallumbilla Pipeline and the Queensland Gas Pipeline. It also noted that a transmission pipeline is generally used to transport gas from the production field to hubs, and it understood that the RNMGP aligns with this function.[25]

The AEMC considered that the RNMGP appears to have features consistent with transmission pipelines, and this would be the preferable classification. In forming this view, it had regard to several characteristics including the pipeline's capacity and diameter, number of injection points, its function of conveying gas from a processing facility to east coast gas markets, and that the RNMGP does not reticulate gas within a market.[26]

AEMO also considered that the RNMGP has features consistent with transmission pipelines, including that it:

- functions as a high-pressure pipeline moving gas from the Roma North (Mimas) Gas Processing Facility to the transmission network
- does not provide direct supply to small customers or distribution customers.

AEMO further submitted that a classification as a transmission pipeline will ensure immediate alignment with the existing gas market frameworks, including its interaction with the wholesale gas markets and its existing registration on the GBB.[27]

4.3.2 Draft decision

On 14 January 2026, the AER published a draft decision to classify the RNMGP as a transmission pipeline.[28]

4.3.3 Submissions to the Draft decision

Stakeholders were invited to provide submissions to the draft decision by 5pm AEDT on Tuesday 3 February 2026. We received no submissions to the draft decision.

4.4 Final decision

Having regard to the NGO, the pipeline classification criterion and stakeholders' views, our final decision is to classify the RNMGP as a transmission pipeline.

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25 NRMMRRD, *Submission to the AER on the AER's draft classification decision for the RNMGP*, 18 August 2025.

26 AEMC, *Submission to the AER on the AER's draft classification decision for the RNMGP*, 19 August 2025.

27 AEMO, *Submission to the AER on the AER's draft classification decision for the RNMGP*, 29 August 2025.

28 AER, *Draft Decision – Roma North (Mimas) Gas Pipeline classification decision*, 14 January 2026.