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Dr Kris Funston  
Executive General Manager, Network Regulation  
Australian Energy Regulator  
Level 27, 135 King Street  
Sydney NSW 2000

Dear Kris

### **APA Amadeus Gas Pipeline – Revised access arrangement proposal**

Jemena appreciates the opportunity to comment on APA's revised access arrangement proposal for the Amadeus Gas Pipeline (**AGP**). Jemena owns and operates a diverse portfolio of energy infrastructure assets, including electricity and gas distribution networks, gas transmission pipelines, and gas processing facilities. Notably, Jemena owns the Northern Gas Pipeline (**NGP**), which provides the key connection between the Northern Territory gas market and the east coast gas market.

Jemena welcomes APA's decision not to proceed with changes to align the AGP's gas specification for Higher Heating Value and Wobbe Index with the quantities in Australian Standard AS 4564. We have no issues with the proposed amendment replacing "Glycols" with "Oils" at 20 millilitres per terajoule, and whilst we have limited understanding of specific reasoning for the change, we would support this adjustment on the basis that it is unlikely to result in any technical issues in operating the nitrogen removal unit at the Phillip Creek Compressor Station (PCCS).

Jemena remains keen to work with APA, producers, users and regulators on aligning the AGP specification with the east coast gas market over the longer term. However, we reiterate that any transition must be coordinated across the many NT gas industry participants, given the potential cost and supply implications for stakeholders. Thorough consultation will help ensure gas costs are minimised for all Australian gas users.

The NGP is a critical piece of infrastructure supporting Australia's energy security. Recent investments enabling gas to flow from Queensland into the NT have provided an important back-up supply when Blacktip production has been constrained, improving the reliability of NT gas supply. The NGP can now also help address potential shortfalls in the east coast market by transporting Beetaloo gas to eastern demand centres once production commences. In this way, the NGP has played – and continues to play – a vital role in maintaining energy reliability in both the NT and the east coast.

It is also important to note that the NGP has spare capacity. Jemena emphasises the importance of fully utilising existing infrastructure before new assets are developed. Maximising the utilisation of existing assets is strongly in the long-term interests of customers, delivering lower costs and lower risk for customers, and minimising impacts on local communities and the environment. The AER should be mindful of any changes that could constrain the use of the NGP—particularly gas specification changes that would prevent gas from flowing to east coast markets or otherwise reduce utilisation.

Jemena has invested significantly in the NT, much of it on a merchant basis, to ensure there are no bottlenecks moving gas into and out of the Territory. However, continued progress requires

investment across the entire supply chain. Jemena is prepared to invest, but cannot do so alone; coordinated action from all stakeholders is essential.

Should you have any questions about this submission, please contact Andrew Zancanaro, Business Development Manager, at [REDACTED]

Yours sincerely

[REDACTED]

**Nerise Cook**  
General Manager Pipelines