

11 February 2026

[REDACTED]  
Director, Gas performance reporting  
Australian Energy Regulator  
23 Marcus Clarke Street  
PO Box 3131  
Canberra, ACT 2601

By email [gaspipelineexemptions@aer.gov.au](mailto:gaspipelineexemptions@aer.gov.au) and [REDACTED]

Dear [REDACTED]

**Re: Classification of Sturt Plateau Pipeline**

APA is pleased to advise that we will soon be commissioning the Sturt Plateau Pipeline (**SPP**) in Northern Territory. The SPP is a buried gas transmission the Tamboran Gas Production Facility to the Amadeus Gas Pipeline, in Northern Territory.

As the pipeline licence (NT:PL38) does not specify whether the SPP is a transmission or distribution pipeline, section 117 of the National Gas Law (**NGL**) requires the service provider to apply to the AER for the pipeline to be classified as a distribution pipeline or transmission pipeline. The application must be made in accordance with Rule 29D of the National Gas Rules (**NGR**).

Please accept this correspondence as an application under section 117 of the NGL, following the requirements of Rule 29D of the NGR.

Under Rule 29D, the application for classification of a pipeline must:

**29D(a) be made in writing**

Please accept this correspondence as satisfaction of the requirements of this Rule.

**29D(b) include the applicant's name and contact details**

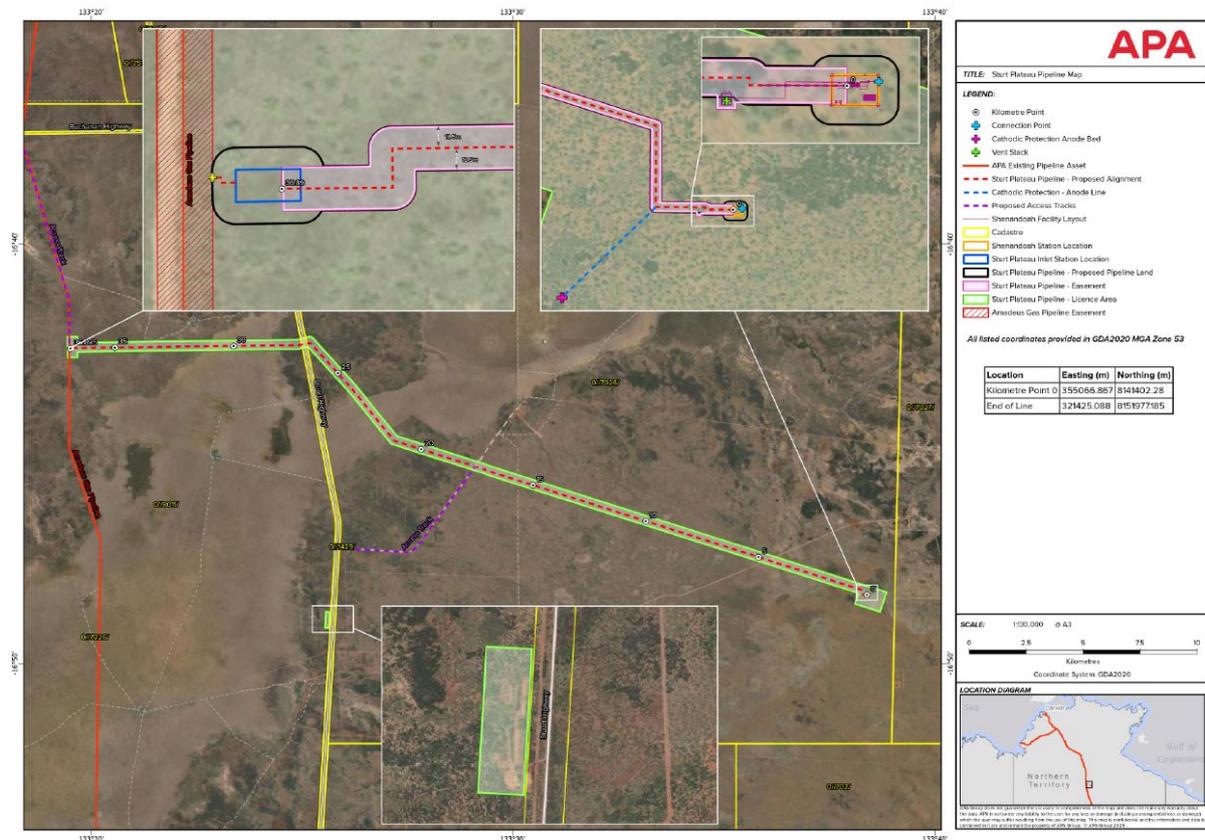
The Applicant is:

APA SPP Pty Ltd  
ACN 679 801 819  
Level 10,121 Castlereagh Street  
Sydney NSW 2000

**29D(c) identify the pipeline to which the application relates**

The SPP is a buried gas transmission pipeline that will connect the Tamboran Gas Production Facility to the Amadeus Gas Pipeline, in Northern Territory.

The SPP is located approximately 650km south of Darwin within the Roper Gulf Regional Council area.



**29D(d) specify the nature of the classification sought by the applicant**

APA SPP Pty Ltd seeks a classification as a transmission pipeline.

**29D(e) demonstrate that the classification would be consistent with the pipeline classification criterion**

The pipeline classification criteria are specified in section 13 of the NGL:

*13—Pipeline classification criterion*

*(1) The pipeline classification criterion is whether the primary function of the pipeline is to—*

- (a) reticulate gas within a market (which is the primary function of a distribution pipeline); or*
- (b) convey gas to a market (which is the primary function of a transmission pipeline).*

The primary purpose of the SPP is to receive gas from Gas Production Facility and transport it to APA's Amadeus Gas Pipeline (AGP).

Accordingly, the primary function of the pipeline aligns to conveying gas to a market than reticulating gas within a market.

(2) Without limiting subsection (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—

(a) the characteristics and classification of, as the case requires, an old scheme transmission pipeline or an old scheme distribution pipeline;

As this is a new pipeline, it has never been classified as an old scheme transmission or an old scheme distribution pipeline.

(b) the characteristics of, as the case requires, a transmission pipeline or a distribution pipeline classified under this Law;

The NGL definitions of a distribution pipeline and a transmission pipeline are:

**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;

**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;

As the pipeline licence does not classify the SPP as either a transmission or distribution pipeline, and the AER has not yet made a determination on its classification (which is the purpose of this application), these definitions do not assist in providing guidance on the appropriate classification.

(c) the characteristics and classification of pipelines specified in the Rules (if any);

The NGR does not appear to set out any criteria or characteristics that assist in determining the appropriate classification of pipelines at this time.

(d) the diameter of the pipeline;

(e) the pressure at which the pipeline is or will be designed to operate;

The SPP comprises of a buried, steel, 325mm outside diameter (nominally DN300), Maximum Allowable Operating Pressure (MAOP) 10.2MPag pressure transmission pipeline of approximately 37 kilometres long.

These diameter and pressure characteristics more consistent with a transmission pipeline than a distribution pipeline.



Australia's energy  
infrastructure partner

*(f) the number of points at which gas can or will be injected into the pipeline;*

As described above, gas will be injected into the SPP at a single point at the Tamboran Gas Production Facility.

*(g) the extent of the area served or to be served by the pipeline;*

The SPP is designed to provide pipeline infrastructure to transport the gas from Tamboran Gas Production Facility to the Amadeus Gas Pipeline.

*(h) the pipeline's linear or dendritic configuration;*

The SPP is a linear configuration.

*(i) the type of pipeline licence or authorisation that has been obtained in respect of the pipeline under jurisdictional gas legislation.*

A pipeline licence (PL38) was issued under the *Energy Pipelines Act 1981 (NT)* on 29 August 2025. It did not classify the SPP as either a transmission or distribution pipeline.

**29D(f) include any other information and materials on which the applicant relies in support of the application.**

APA SPP Pty Ltd notes that the SPP serves a single large customer, rather than a large number of small customers as would be expected of a distribution pipeline.

APA SPP Pty Ltd submits this application for classification of the SPP as required under section 117 of the NGL.

Please contact me if you would like to discuss any part of this application. I can be reached on [REDACTED] or at [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

Regulatory Compliance Manager