

Our Ref: 31109224
Contact Officer: David Monk
Contact Phone: [REDACTED]

27 March 2026

Natalie Lindsay
GM Economic Regulation and External Policy
APA Group Limited
Level 25, 580 George Street
Sydney NSW 2000

Sent by email to: [REDACTED]

Dear Natalie,

Re: APT Petroleum Pipelines Pty Limited Roma Brisbane Pipeline – 2026 Reference Tariff Adjustment

I am writing to advise you of the Australian Energy Regulator's (AER) assessment of APT Petroleum Pipelines Pty Limited's (APTPPL) cost through application seeking approval for a cost pass through adjustment to the Roma Brisbane Pipeline (RBP) reference tariff.

In accordance with rule 97 of the National Gas Rules (NGR) and section 4.5.5 of the RBP 2022-27 Access Arrangement, the AER has determined that a tax change event has occurred, and the required pass through amount is \$1,284,145 (\$Dec2026). This amount should be reflected through an increase in reference tariffs from 1 July 2026.

Details of the AER's assessment against the relevant factors in the NGR and the RBP 2022-27 Access Arrangement are set out in the following attachment. If you have any queries on this matter, please contact David Monk at [REDACTED]

Yours sincerely

[REDACTED]

Ben Stonehouse

Acting General Manager
Network Expenditure

Sent by email on: 27.03.2026

Attachment A: Requirements for determining a tax change event has occurred

Requirement of the NGR and RBP 2022-27 Access Arrangement	AER consideration
Does APTPL's reference tariff variation mechanism provide for variation of a reference tariff as a result of a cost pass through for a defined event (such as a cost pass through for a particular tax)? ¹	Yes, the reference tariff variation mechanism provided for the variation of a reference tariff in relation to defined events, including a tax change event.
We must take into account whether the cost to be passed through are for the delivery of Pipeline Services. ²	Yes, we consider that the costs to be passed through were incurred for providing regulated pipeline services on the RBP.
We must take into account whether the costs are incremental to costs already allowed for in Reference Tariffs. ³	Yes, we consider that the actual fee charged, \$1,594,870 (\$Jun2026), was materially higher than the forecast fee charge of \$339,658 (\$Jun2026), representing an increase of \$1,255,211 (\$Jun2026) or \$1,284,145 (\$Dec2026).
We must take into account whether the total costs to be passed through are building block components of Total Revenue. ⁴	Yes, we consider that the total costs to be pass through are part of the opex building block component of Total Revenue.
We must take into account whether the costs to be passed through meet the relevant NGR criteria for determining the building block for Total Revenue in determining Reference Tariffs. ⁵	Yes, we consider that the pass through amount, \$1,284,145 (\$Dec2026) meets the relevant NGR criteria for determining the opex building component of the Total Revenue.
We must take into account any other factors considered relevant and consistent with the NGR and NGL. ⁶	We do not consider any other factors to be relevant.
Is the cost pass through event an insurance cap event, an insurance credit risk event, a natural disaster event, a regulatory change event, a service standard event, a tax change event, or a terrorism event? ⁷	Yes. The cost pass through event is a tax change event.
Are the costs incurred from this event considered to materially increase/decrease costs where the cumulative costs of that event separately have an impact of at least 1% of the smoothed forecast revenue specified in the RBP 2022-27 Access Arrangement? ⁸	Yes, the incremental costs incurred due to this event materially increase costs, i.e. the impact is greater than 1% of the smoothed forecast revenue specified in the RBP 2022-27 Access Arrangement for 2025-26.

¹ NGR r97(1)(c)

² Section 4.5.5(a) Roma to Brisbane pipeline – Access arrangement – Effective 1 July 2022 to 30 June 2027

³ Section 4.5.5(b) Roma to Brisbane pipeline – Access arrangement – Effective 1 July 2022 to 30 June 2027

⁴ Section 4.5.5(c) Roma to Brisbane pipeline – Access arrangement – Effective 1 July 2022 to 30 June 2027

⁵ Section 4.5.5(d) Roma to Brisbane pipeline – Access arrangement – Effective 1 July 2022 to 30 June 2027

⁶ Section 4.5.5(e) Roma to Brisbane pipeline – Access arrangement – Effective 1 July 2022 to 30 June 2027

⁷ Section 4.5.5 Roma to Brisbane pipeline – Access arrangement – Effective 1 July 2022 to 30 June 2027

⁸ Section 4.5.6 Roma to Brisbane pipeline – Access arrangement – Effective 1 July 2022 to 30 June 2027

<p>Did APTPPL notify the AER of the cost pass through event within 90 days business days of the event occurring?⁹</p>	<p>Yes. APTPPL received the Annual Fee invoice on 24 July 2025, and notified the AER of the cost pass through event on 27 November 2025, which is within 90 business days.</p>
<p>When notifying, did APTPPL provide a statement, signed by an authorised officer of APTPPL, verifying that the costs of any pass through events are net of any payments made by an insurer or third party which partially or wholly offsets the financial impact of that event (including self insurance)?¹⁰</p>	<p>Yes. APTPPL provided a statement, signed by an authorised officer of APTPPL verifying that the costs of the Queensland Government's Annual Fee for National Energy Market Regulation for 2025-26 are net of any payments made by an insurer or third party which partially or wholly offsets the financial impact of that event.</p>

⁹ Section 4.5.7 Roma to Brisbane pipeline – Access arrangement – Effective 1 July 2022 to 30 June 2027

¹⁰ Section 4.5.7 Roma to Brisbane pipeline – Access arrangement – Effective 1 July 2022 to 30 June 2027