

1 July 2026

SUBMISSION ON MULTINET GAS NETWORKS ACCESS ARRANGEMENT 2028-33

Thank you for the opportunity to make a submission on Multinet Gas Networks (Multinet) Reference Service Proposal (RSP) for the 2028–33 Gas Access Arrangement, lodged with the Australian Energy Regulator (AER) on 1 June 2026.

LMS Energy (LMS) provides the below summary of LMS, followed by key points relating to the RSP.

LMS ENERGY OVERVIEW

LMS is Australia's largest bioenergy company and abates around 5 million tonnes of carbon dioxide equivalent per annum. It is committed to helping protect the planet from climate change and does this by capturing methane emissions produced from the natural decomposition of organic wastes.

LMS is Australian owned with 70 landfill biogas facilities across Australia, New Zealand and the United States of America, along with 4 solar farms. It employs 300 people, including in regional Australia. The biogas generated at LMS' bioenergy facilities is currently converted to renewable electricity. It generates enough renewable electricity to power 110,000 homes 24/7 everyday. There is significant opportunity for LMS to generate biomethane from biogas at a range of its bioenergy facilities as suitable policy is established as well as to expand its operations to increase overall renewable energy production.

KEY POINTS

LMS offers the below key points in response to the Multinet RSP 2028-33 Access Arrangement consultation:

- **Renewable gas is critical to decarbonisation of the gas networks.** Australia's Net Zero and Energy and Electricity sector plans stipulate renewable natural gas (biomethane) as a core element of decarbonising energy and the gas sector and plan for it to be a key part of the gas network in 2035¹. Therefore, gas access arrangements out to 2033 need to consider its injection, to support the currently nascent renewable gas sector.
- **Renewable gas is core to the National Gas Objectives.** Provision of renewable gas through the gas grid would reduce greenhouse gas emissions and help achieve emission reduction targets set nationally and within Victoria. Enabling this access for remaining gas users as an option is critical, particularly for hard-to-abate sectors with a current inability to electrify.

¹ Australian Government, 2025, 'Australia's Net Zero Plan', <<https://www.dcccew.gov.au/sites/default/files/documents/net-zero-report.pdf>>, and Australian Government, 2025, 'Electricity and Energy Sector Plan', <<https://www.dcccew.gov.au/sites/default/files/documents/electricity-energy-sector-plan-2025.pdf>>.

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- **Ensure the RSP includes provision for ‘covered gases’, not just ‘natural gas’.** AGIG is supportive of renewable gas² and LMS requests that the RSP be revised by Multinet/AGIG and the AER to ensure it reflects this and explicitly enables renewable gas within their network. For example through either the use of renewable gas terminology or through amendment of the term ‘natural gas’ throughout the RSP to ‘covered gases’.
- **Renewable gas inclusion important to all RSP access arrangements.** LMS requests that the AER consider all RSP access arrangement applications with the lens of enabling renewable gas within the infrastructure to avoid unintentionally limiting potential access to this low carbon energy form.

We thank you for considering LMS’ submission. LMS would be happy to discuss any aspect of this information or any further queries as may be helpful.

² Australian Gas Infrastructure Group, ‘Renewable Gas’, <<https://www.agig.com.au/renewable-gas>>.

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