

APA

Australia's energy
infrastructure partner

Engagement Summary Report

Roma Brisbane Pipeline 2027–32 Access
Arrangement

1 July 2026



About this document

This document summarises the engagement journey APA has undertaken with stakeholders to prepare the 2027–32 RBP Access Arrangement Proposal (**Proposal**) including:

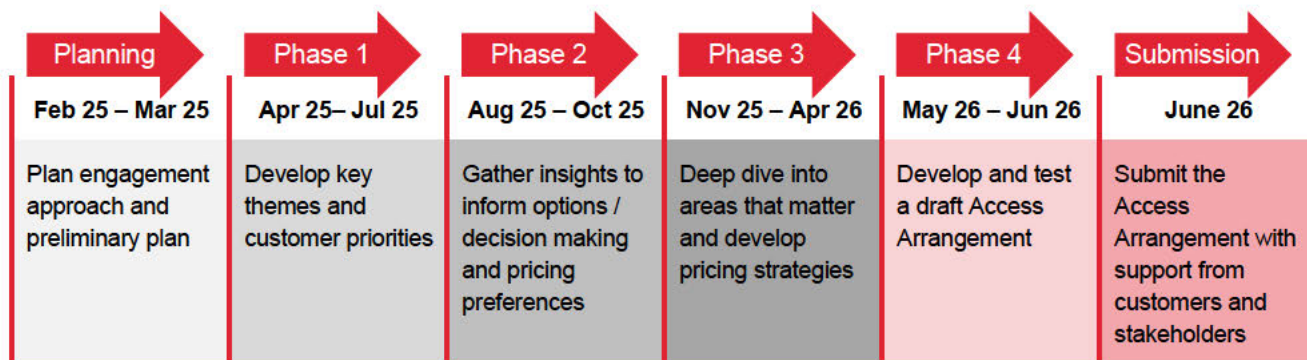
- the engagement approach
- the timeline of engagement activities to date and the next steps in relation to stakeholder engagement
- what was heard from stakeholders during the engagement activities and how APA responded to this feedback in developing the Access Arrangement
- a summary of stakeholders’ evaluation of RBP’s engagement program.

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Engagement approach

APA is committed to embedding quality stakeholder engagement into our business. Our aim is to ensure the RBP Access Arrangement appropriately reflects the views of the consumers and communities we serve. To meet this expectation, we adopted a multiphase approach to our engagement:



The key activity in Phase 1 was a Co-creation workshop, held virtually with stakeholders in April 2025. More than 60 individual stakeholders from over 40 different organisations were invited to participate. We received 12 acceptances and, on the day, 10 participants from nine organisations were able to attend and contribute to the co-creation workshop.

The outputs of the Co-creation workshop directly informed the final engagement objectives and the key themes and priorities for the review. A stakeholder reference group was subsequently formed to assist APA in understanding the needs and expectations of different customer segments, including vulnerable groups.

Overview of the stakeholder reference group

The primary role of the stakeholder reference group is to provide input and challenge to APA's proposed plans to ensure the Access Arrangement appropriately addresses the needs and preferences of customers. The secondary role relates to approving the initial engagement plan and continuing the co-design of the ongoing engagement program.

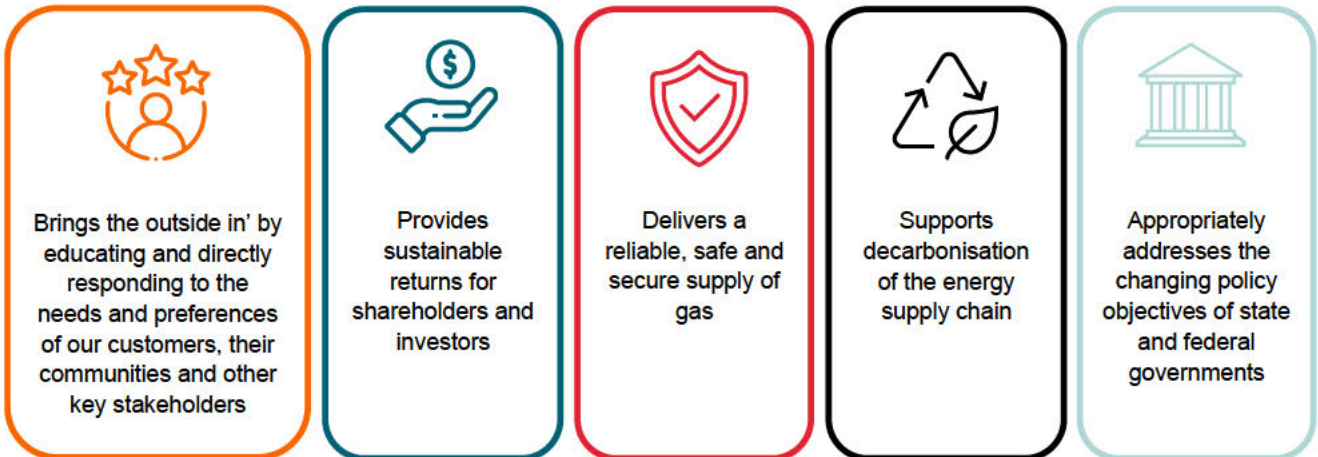
Along with an independent consumer advocate, representatives from the below organisations participated in the stakeholder reference group at various times and at varying levels. Staff from the AER were also invited to observe the engagement process.

Organisation	Stakeholder group	Organisation	Stakeholder group
AGL	Shipper	CSR Limited	Large customer
Alinta Energy	Shipper	Glencore Limited	Producer
Arrow Energy	Producer	Jemena	Gas distributor
Brickworks Building Products	Large customer	Maranoa Regional Council	Local government
Cadesi	Renewable energy	Queensland Farmers Federation	Landholders
CleanCo Queensland	Generator	Origin Energy	Shipper
Coexistence Queensland	State government	Shell Energy	Producer
Council on the Ageing, QLD	Customer advocate	St Vincent De Paul	Customer advocate
CS Energy	Gentailer	VFRenewables	Renewable energy
Energy Users Association of Australia	Large business advocate	Western Downs Regional Council	Local government

Engagement objectives

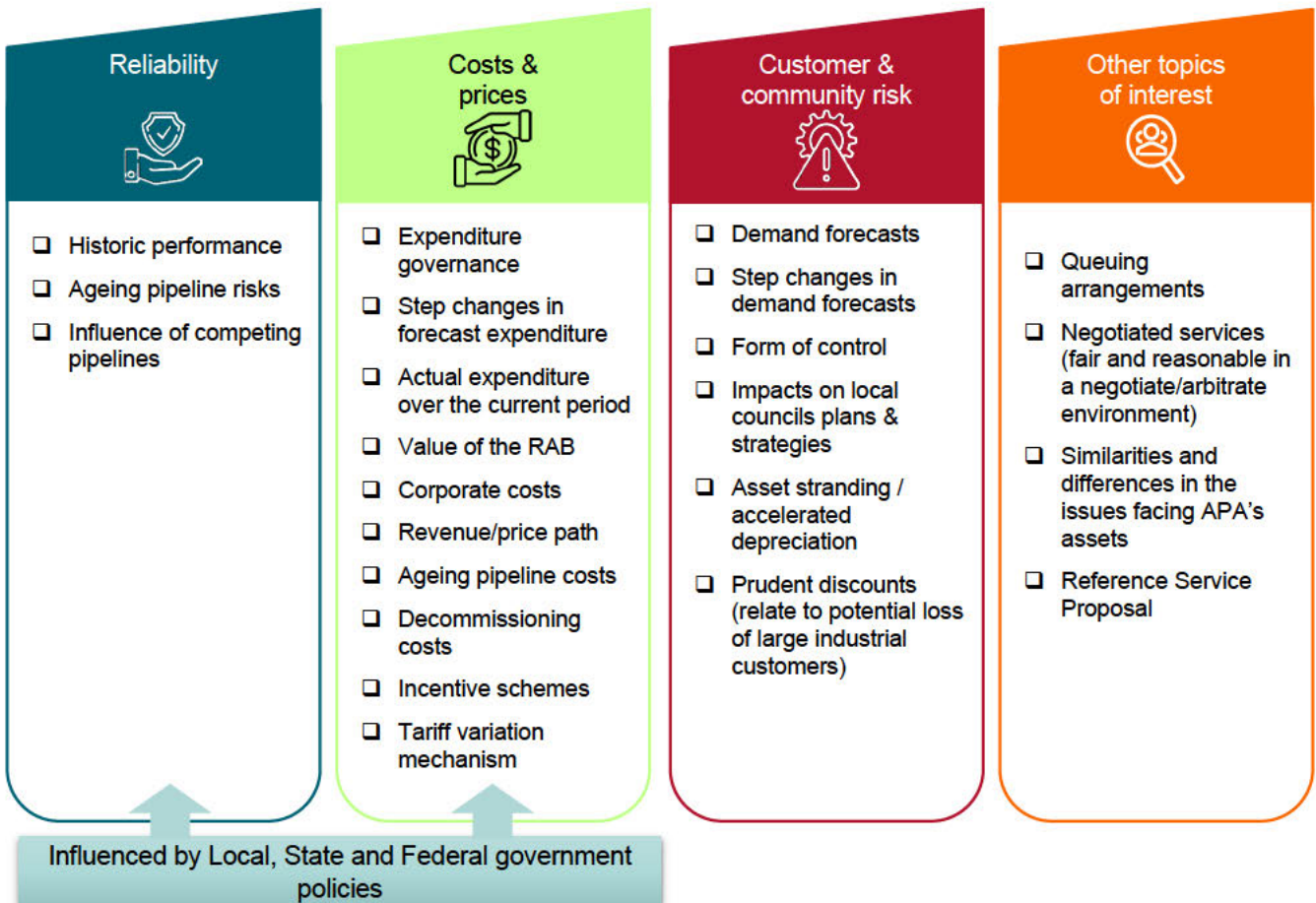
The agreed engagement objectives following the Co-creation workshop are shown below.

APA's engagement objectives are to deliver an access arrangement that is capable of acceptance and:



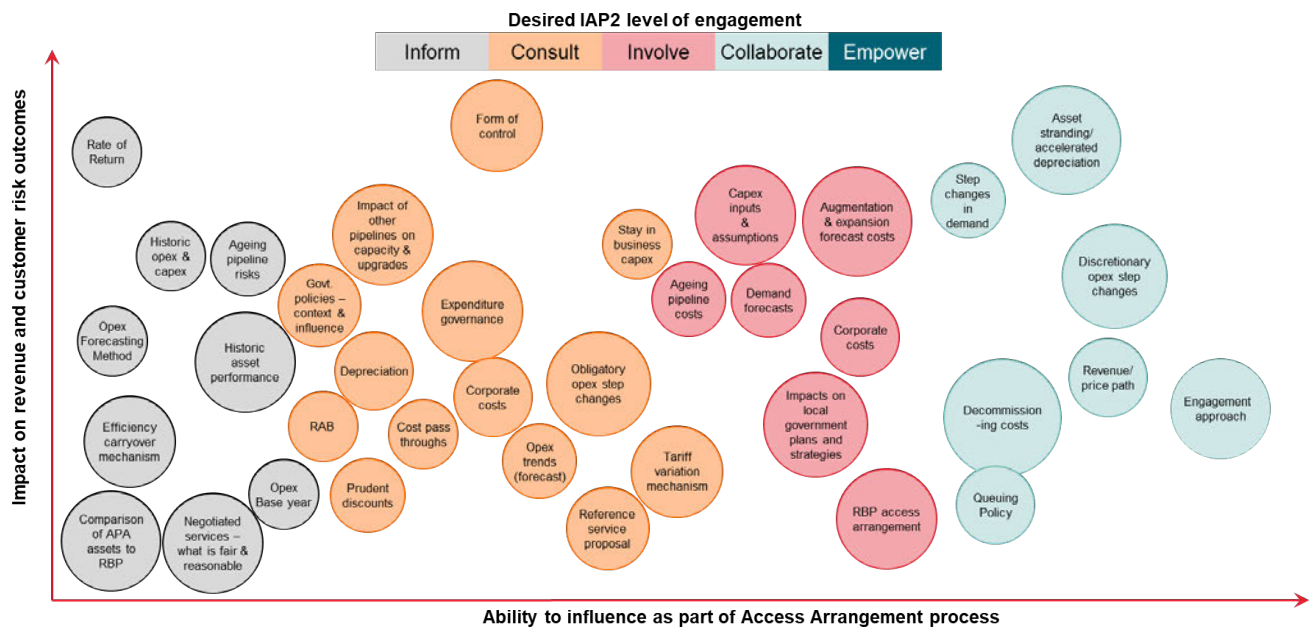
Stakeholders' priorities for the 2027–32 Access Arrangement

The Co-creation workshop identified stakeholders' priorities for the 2027–32 Access Arrangement. These were combined with the requirements of the AER's 'Better Resets Handbook' to form a checklist for the engagement program.



The engagement plan, that was subsequently reviewed and approved by the stakeholder reference group addressed these priorities. Engagement was focused on the issues where stakeholders could have the greatest impact and where their opinion would genuinely influence and guide the development of the Access Arrangement.

Mapping of priorities and topics against the IAP2 spectrum



Subsequent consultation took place over a 13-month period to deliver an Access Arrangement for the 2027–32 period that reflects consumer and stakeholder priorities and preferences and is capable of acceptance.

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Engagement journey to date and next steps

Our Proposal has been informed by six meetings with our stakeholder reference group. We held a seventh meeting to gather qualitative insights to inform our write-up of the Stakeholder Reference Group Survey results.

We will reconnect with stakeholders following the AER's Draft Decision. Three key topics for discussion at this next meeting are:

- The preferred RBP asset life
- Explaining our rationale for, and seeking feedback on, the late change to Access Arrangement wording regarding when contract renewals are considered to be spare capacity, and clarification that a contract renewal does not constitute a new access request, and
- Outlining the reasoning behind the proposal to include “epidemics” in the list of natural disaster cost pass through events and understanding stakeholder views on this inclusion.

A timeline of our stakeholder engagement interactions to date follows.



Wallumbilla Gas Hub

Timeline of engagement interactions and topics discussed to date

30 April 2025	Co-creation workshop	– Overview of the RBP – Identification of core issues and priorities – Agree evaluation and feedback loops
15 May 2025	Shared output from the co-creation workshop and a draft engagement plan	
4 June 2025	Stakeholder meeting 1	– Confirm engagement approach and plan – Overview of the regulatory framework, government policy context and operating context for the RBP – Understand whether changes are needed to the current reference services – Performance of RBP over the current period and future challenges and opportunities
20 June 2025	Shared draft Reference Service Proposal for comments and feedback	
12 August 2025	Stakeholder meeting 2	– Expenditure governance – The risks and costs of an ageing pipeline and the impact of other nearby pipelines – Introduction to AA terms and conditions – Overview of the building block approach and form of control
25 November 2025	Stakeholder meeting 3	– Explain the efficiency carryover mechanism – Outline stay-in-business capital expenditure programs – Future of the DN250 pipeline – Appetite to shorten asset lives – Appetite to reform the current queuing arrangements – Stakeholder survey questions and approach
10 February 2026	Stakeholder meeting 4	– Demand outlook and the impact on local government plans and strategies in light of the Queensland Energy Roadmap & Brigalow Gas-Powered Generation (GPG) – First look at operating expenditure and the output from the efficiency carryover mechanism – First look at capital expenditure, a proposed new 'Pipeline Integrity' asset class and why a Capital Expenditure Sharing Scheme should not apply to the RBP – Indicative revenue requirement and Regulated Asset Base (RAB) and how different asset lives would impact revenue – Feedback on initial queuing arrangement changes
31 March 2026	Stakeholder meeting 5	– Corporate costs – Capital expenditure overspends and the impact of a potential Capital Expenditure Sharing Scheme – Updates to expenditure, the RAB, revenue requirement and APA's view of RBP's economic life – Demand forecasts, the preferred price path, prudent discounts, the tariff variation mechanism & rebateable services – Proposed changes to queueing arrangements – Review of the stakeholder survey questions
17 April 2026	Shared the 'Overview of the draft Access Arrangement' and the 'Draft Engagement Summary Report' (Draft Overview) with the wider group of RBP stakeholders for comments and feedback	

29 April 2026

Stakeholder meeting 6

- Shared refinements to capital expenditure, operating expenditure and Efficiency Carryover Mechanism calculation since the group last met
- Walked through and sought feedback on all matters included in the Draft Overview
- Shared the draft opening RAB result as of 1 July 2027, the forecast RAB movements over the 2027–32 period and the forecast closing RAB value on 30 June 2032

12 May 2026

Stakeholder meeting 7

- Shared raw survey results and discussed comments to better understand the context to assist with accurately writing up the summary of the stakeholder survey results

5 June 2026

Shared the 'Draft summary of the stakeholder survey results' with the stakeholder group for comments and feedback

... on-going engagement to be confirmed following publication of the AER's draft decision

Dalby Compressor station



What we heard and how we have responded

Priority	What we heard	How we have responded
Reliability 	Deliverability Stakeholders queried whether APA is experiencing labour, materials, and supply chain cost pressures and whether deliverability of RBP projects is at risk given the work programs taking place in Queensland and the impending Olympic Games.	We confirmed that cost pressures are an issue, along with new events or threats, but the monthly governance process ensures continued prudence, with the performance, cost or schedule of projects reconsidered if costs rise.
	Competition Stakeholders wanted to understand where RBP experienced competition from other pipelines.	We confirmed the competition comes from producers in the Surat Basin who could use the Darling Downs Pipeline or the RBP to get the gas to Wallumbilla. The RBP is the only pipeline taking gas into Brisbane.
	Pipeline integrity Stakeholders wanted to know whether there are any other remaining older sections of RBP pipeline using the same, now failing, pipeline coating as the DN250.	There is 50km of DN300 pipeline (slightly larger diameter than the DN250) that is still operational in Brisbane with the same type of coating.
Affordability 	Expenditure governance – APA was asked to present on RBP's capital expenditure against budget and any post implementation reviews to demonstrate the effectiveness of governance processes. – Stakeholders asked whether expenditure governance processes and the gateway teams are APA wide and whether projects compete for capital. – A stakeholder was interested to know the AACE class approval level for projects that are not stay-in-business i.e. one-off.	– There have not yet been any Post Implementation Reviews undertaken for RBP as no one-off projects have yet been completed. We shared data on budget to actual expenditure for projects completed in this period to demonstrate that most projects are completed within $\pm 20\%$ of their budget that is set when they secure funding as part of APA's annual cycle. – We confirmed that expenditure governance processes are APA wide, that gateway teams are established for each asset and that each project does compete for funding. – We confirmed the AACE class approval varies on a project-to-project basis and is refined at each stage it is presented to the Gateway team and Steering Committee. Level 2 is the target for a Final Investment Decision, but Level 3 may be reached depending on the project.
	Operating expenditure – A stakeholder was interested to know what Security Posture (SP) level APA targets in relation to Security of Critical Infrastructure (SOCI) compliance. – Stakeholders were interested to know whether RBP's insurance covered natural disasters and the extent to which these costs are covered by insurance. – Other than asking why a later base year was not proposed stakeholders raised no other concerns with our operating expenditure forecast.	– We shared that APA aims to meet level SP2 for SOCI compliance under the Australian Energy Sector Cyber Security Framework. – We confirmed RBP is covered for natural disasters under APA's Group insurance. No specific exclusions pertain and the standard \$2.5 million excess applies. – We explained we have adopted 2024–25 as the base year as this is the most recent audited data available at the time our Proposal will be lodged with the AER in June 2026.

Priority	What we heard	How we have responded
Affordability continued 	Capital expenditure - A stakeholder queried why integrity inspections are treated as capital rather than operating expenditure as it seems the costs are more akin to maintenance activities. - A stakeholder was interested to understand what liability shippers have in relation to meeting the gas specification and the damages they pay if they do not deliver gas to the required specification. - Other than clarifying what happens if the conditions change and further subsidence occurs at the Toowoomba Ranges over the 2027–32 period (for which expenditure has been proposed), stakeholders raised no concerns with the proposed capital expenditure forecast.	- We explained that capitalisation of these costs is consistent with the applicable Accounting Standards and aligned with APA's audited annual statutory accounts. - We outlined that, under their Gas Transportation Agreement, shippers have liability for any damage caused should they inject gas outside the required specification. - We confirmed we are unable to include the Toowoomba Ranges slope stabilisation as a contingent project. If instability does emerge in the 2027–32 period, we will either conduct repairs and the expenditure will be an ex-post negotiation with the AER at the next reset period or, if the project can be deferred, the costs will form part of the expenditure discussions for the next (2032–37) reset.
	Capital expenditure overspends Stakeholders wanted to understand more about why capital expenditure overspends occur and whether forecasting accuracy was easier 10 to 15 years ago.	We explained that we forecast expected stay-in-business expenditure and no contingency is made for unexpected events/projects, which have been the primary driver of historic overspends. We also shared how nuances and project features can lead to overspends as forecasts are based on an assumed corrosion rate and level of features for a planned number of digs, and there is always variability in the degree and extent of damage that cannot be determined until the pipeline is excavated. Just one complex dig can throw out an entire estimate. Uncertainty has also increased with asset age, and we are now experiencing time dependent defect growth that was not an issue 10 years ago. Advances in In-line Inspection (ILI) technology have improved detection capability and feature accuracy but also increased compliance and safety requirements and lead to more excavations and inspections. As a small share of the international market, Australia's bargaining power in relation to ILI is limited and heavily influenced by changes to overseas regulations – this means we are vulnerable to price increases. Changes in the pipeline's demand and flow has driven the need to upgrade pig launchers/receivers and this then drives other costs as the change necessitates a need to uplift compliance to meet today's standards.

Priority	What we heard	How we have responded
Affordability continued 	Corporate costs Other than clarifying whether the corporate cost allocation methodology has been approved by the AER and whether the AER will assess the prudence and efficiency of RBP's share of the IT program, stakeholders raised no concerns with the proposed forecast of corporate costs.	Our forecast corporate costs are expected to be significantly lower given the SOCI and Information Technology upgrades undertaken in recent years will be completed.
	Tariffs One stakeholder questioned whether the structure of tariffs is appropriate, particularly whether there is a capacity demand component.	We confirmed that the reference service is a capacity tariff and that the forecast demand is based on Maximum Daily Quantity, not average volume, as customers are buying capacity.
	Price path In the lead up to the Draft Overview, consumer advocates voiced a preference for continuous price increases and the avoidance of a large first-year price shock but indicated that RBP's customers would be best placed to comment. We subsequently targeted RBP customers for their price path preference and heard the following views: - One customer saw a higher uplift in the first year followed by no real price increases, as better supporting planning compared to a series of ongoing increases - One customer thought equal X factors (the approach generally adopted by electricity networks) provided a suitable middle ground.	We are conscious that pricing preferences for our contracted customer's will be influenced by their contract timeframes and when they are due for renegotiation. As a result, and in line with our Draft Overview, we have targeted the same price rise in cents each year to avoid a sudden price shock in any year. We have presented a book end to this approach to highlight the reference service tariff outcome if prices were instead raised in the first year and then kept flat in real terms and we remain open to stakeholder views on a preferred price path.
	Revenue smoothing adjustment Stakeholders wanted to understand the drivers of the revenue smoothing adjustment.	We have included an explanation of the revenue smoothing adjustment in the RBP Proposal.
Customer & community risk 	Form of control - Stakeholders were curious to know whether RBP should move from a price cap to a revenue cap model, like some gas distribution networks are doing. - In a later meeting, we were also asked to explain why the hybrid 'cap and collar' form of control is not appropriate for RBP, given it is largely being applied to gas distribution networks.	- We explained that as a contract carriage pipeline, moving to a revenue cap would entail a wholesale change to how APA contracts to shippers. The dynamics of transmission networks differ from that of distribution networks, so the drivers for changes to the form of control do not exist at the transmission level. - We have included a section on form of control in our Proposal document and explained why a price cap is the most suitable form of control for the contract carriage nature of the RBP.

Priority	What we heard	How we have responded
Customer & community risk continued 	Landholders and social license Stakeholders queried whether social license is a growing risk for RBP. Stakeholders queried whether social license is a growing risk for RBP. Stakeholders were interested in seeing any redundant easements or pipework associated with the DN250 repurposed to provide a corridor and transport for an alternative resource.	We confirmed social license is more critical than in the past, but landowners are key business partners. A dedicated team at APA manages landholder interactions including safety awareness and other education. We explained that we are not experts in this area but conceptually there are a few technologies that might be suitable to convert a steel pipeline to a water service.
	Redundant/stranded assets Stakeholders queried whether RBP had any potential stranded assets, given industrial customer closures, and, if capital redundancy was an issue for RBP.	We confirmed that in gas transmission, an asset is stranded when it no longer serves customers. All sections of the pipeline still serve customers so, whilst utilisation has dropped, there are no stranded assets. RBP assets that have been taken out of service have all been fully depreciated in the RAB, so capital redundancy is not an issue.
	Shortening asset lives Whilst stakeholders thought there may be an argument to shorten some RBP asset lives to account for the expected decline in gas demand, they appreciated any material change would be difficult given there is no explicit Queensland government policy on phasing out gas. Initially, the group was keen understand APA's view of the economic life of the asset and how much the reference tariff would increase if the asset life were shortened to align the current 2071 end life with the 2060 accounting life. To better understand the longer-term impact on customers, at a later meeting, it was suggested we present the tariffs arising from shortening the asset life to end in 2050 at the start of the 2027–32 period compared to the start of the 2032–37 period.	Whilst we agree there is uncertainty about end-of-life timing, we are confident gas will continue to have a role well beyond 2050. We shared that reducing the Pipeline asset class to end in 2060 rather than 2071 would add about 10 cents on average per annum to the reference service tariff. We have presented the tariff outcomes of reducing the asset life to end in 2050 at both the start of the 2027–32 period and the next period and indicated we will continue to engage with stakeholders on this matter and reflect their preference in our Revised Proposal.
	New asset class Other than clarifying why historical integrity inspection related costs were not being extracted or written-off from the Pipelines asset class and confirming the AER had approved this sort of asset class for other assets, stakeholders raised no issues or concerns with the creation of a new 'Integrity inspections' asset class to capture costs for the 10 yearly In-line inspections, associated validation digs and RBP's share of the costs related to the Pipeline Integrity Management tool (where the inspection data is stored).	We explained the intent of the new asset class is to correct the treatment of costs going forward, rather than attempt to unwind historical decisions and this Proposal responds to stakeholders' concerns regarding accelerating depreciation. We confirmed the: – Historical costs have not yet been fully recovered so should not be removed from the RAB. – AER has approved the asset class for the Victorian Transmission System, and it was approved by the Economic Regulation Authority Western Australia for Goldfields Gas Pipeline.

Priority	What we heard	How we have responded
Customer & community risk continued 	Demand Stakeholders were keen to understand the historic pipeline utilisation and peak demand, how this compares to the forecast utilisation and peak demand and how the 'Queensland Energy Roadmap' will impact the RBP. Later in the engagement program we presented our demand forecasts. Other than a stakeholder asking whether the latest Australian Energy Market Operator's 2026 'Gas Statement of Opportunities' had implications for RBP, stakeholders raised no concerns with our forecast approach or outcome.	We shared how demand and utilisation in the current period have fallen short of expectations due to industrial closures and uncertainty surrounding the energy transition increasing the use of shorter-term contracting (day ahead or month ahead). We confirmed that our demand forecasts are based on a bottom-up build for each customer segment and have considered the Queensland Energy Roadmap and the 2026 'Gas Statement of Opportunities'. The demand forecast in our Proposal has been amended from that presented in our Draft Overview, in light of an independent expert's assessment of the broader east coast gas market and the interaction with forecasts for electricity demand in the National Electricity Market.
	Demand sensitivity Stakeholders were keen to understand the sensitivity of the reference price to the demand forecasts, especially if forecast GPG demand is deferred or does not eventuate.	We shared a sensitivity analysis based on the Draft Overview with our stakeholder group ahead of publishing our Proposal. As noted above, we have altered our demand forecasts for the Proposal. In the interests of transparency, we have included an updated demand sensitivity analysis in the Proposal document.
	Impact of a potential Capital Expenditure Sharing Scheme Stakeholders wanted to understand more about: – What the tariff impacts would be had a Capital Expenditure Sharing Scheme (CESS) been applied to RBP for the 2022–27 period. – How many RBP customers are on the reference tariff versus a negotiated tariff and if there is a particular 'type' of customer that prefers the reference tariff. – The revenue split from reference service tariffs and negotiated tariffs. – How a CESS would apply to customers on negotiated tariffs.	– RBP would incur a penalty of \$6.8 million if a CESS was applied in the current period. This would result in an average reduction to the annual nominal reference service price in the 2027–32 period of 2.1%, which would lower the average reference service tariff by two cents. – Some RBP customers hold more than one contract for different purposes. Currently, two customers have a reference service contracted. Both contracts are for shippers. – Less than 10% of revenue is derived from customers on reference service tariffs. – Customers on negotiated contracts would only receive any benefit/loss of a CESS at the time of their next contract negotiation.

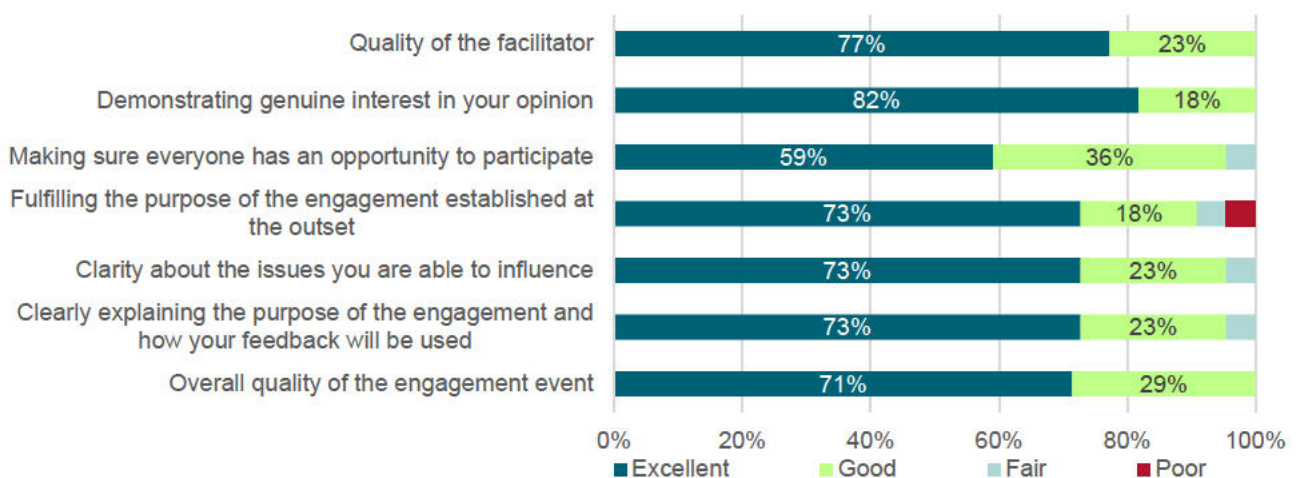
Priority	What we heard	How we have responded
Other topics of interest 	Queuing arrangements After we shared the shortfalls in the current process, stakeholders supported adjustments to the queuing arrangements. After we presented our proposed changes, other than clarifying whether customers should pay to be in the queue, to avoid locking up capacity and asking whether Developable Capacity had ever been used in practice, consumer advocates thought the proposed changes seemed reasonable, but that RBP's customers would be best placed to comment. We subsequently held one-on-one discussions with RBP customers in our stakeholder group who thought the changes seemed pragmatic. We also requested feedback and offered the opportunity to discuss the implications of the proposed changes from a wider group of stakeholders when we published our Draft Overview documents but received no feedback or requests for discussions.	We have proposed alterations to ensure we can efficiently manage congestion, facilitate new connections, and that prospective users are not unfairly disadvantaged. Our discussions with customers indicate the proposed changes are practical and supported as no concerns have been raised. However, we have made a late addition that we have yet to discuss with stakeholders for two aspects not considered in the existing Access Arrangement wording – namely: • when the capacity of existing shipper contracts approaching renewal is to be considered spare capacity, and • to clarify that a contract renewal does not constitute a new access request. We will discuss this change with stakeholders and obtain their feedback ahead of submitting our Revised Proposal.
	Reference service Proposal Stakeholders raised no concerns regarding the proposal to revert to just one reference service – long term firm transportation for the 2027–32 period. In response to our draft Reference Service Proposal: – We heard from two stakeholders that they had no concerns with the draft version – One stakeholder requested the final Reference Service Proposal provide further clarification on capacity trading services, current rebateable services and historic demand/revenue for the various services.	Our final Reference Service Proposal: – Clarified the capacity related services – Highlighted current rebateable services, and – Included five years of data for relevant pipeline services, as well as recent rebateable revenue. We will adjust the 2027–32 Access Arrangement to refer to just one reference service – long term firm transportation.
	Negotiated services – A stakeholder was keen to understand whether customers have found the process of asking for other pipeline services, and the prices offered, satisfactory. – Given Negotiated services were listed as a stakeholder priority, we specifically asked what other information stakeholders were after in relation to this topic later in the engagement program, but no other issues or concerns were raised.	– A customer responded that from their perspective, the firm service meets their business' need and, whilst they don't tend to utilise most other services, 'In-pipe trade' had proven helpful and useful.

Engagement evaluation

Evaluation throughout the engagement program

Stakeholder feedback was captured throughout the process through a short evaluation survey that was sent following each meeting. The evaluation survey allowed stakeholder participants to rate the quality and content of the session and provide comments on what was done well, what could be improved in future sessions as well as any topics that stakeholders were interested in exploring further. How APA had taken this feedback on board was shared with stakeholders as part of the introduction at the following stakeholder meeting.

An average response rate of 32% was achieved for these surveys with 97% ratings of Good or Excellent across all the stakeholder meetings and the Co-creation workshop. The overall results from the evaluation surveys are shown below along with a summary of the comments received and our learnings.



What did you enjoyed most, what was done well?

- Participants valued the strong facilitation and structure of the sessions which allowed meaningful opportunities for discussion, feedback, and rich conversation to take place, whilst also keeping the meetings to time.
- Our engagement was seen as open and collaborative, with the right mix of presenters in the room, and we demonstrated a genuine willingness to listen. This helped build confidence that participant views would be fairly represented.
- We received repeated praise for providing high-quality, clearly presented slides well in advance of meetings. This enabled stakeholders to better prepare and be informed for meetings and ask deeper questions.
- Stakeholders also appreciated transparent follow-up through the action list, and our visible responsiveness to feedback from previous meetings. Overall, the sessions were seen as well-run, informative, and engaging.

What could be done better in future sessions?

- Sharing the slides for the Co-creation workshop ahead of time would have allowed stakeholders to involve colleagues with a deeper historical knowledge.
- There was concern that stakeholders not 'in the room' would miss out on engaging on key aspects, like the Reference Service Proposal.
- Our attempts to recruit missing stakeholder groups was appreciated, but there was recurring concern about the limited participation from many stakeholders and suggestions to ensure any potential barriers to contributing were removed.
- It was also suggested we improve transparency and clarity by clearly signalling where agenda items sit on the IAP2 spectrum.

Learnings

- We will share the Co-creation slides ahead of the meeting next time
- We shared the draft Reference Service proposal and Draft Overview documents with the wider stakeholder group
- We encouraged one-on-one discussions with stakeholders outside of the stakeholder meetings
- We added the map of priorities and topics against the IAP2 spectrum to the introduction slide for each meeting topic to clearly indicate the level of stakeholder influence and discussion expected.

Evaluation of the engagement program as a whole

Overall evaluation of the engagement program was captured by stakeholder reference group members completing a detailed survey that was open for just over three weeks, beginning on the date the Draft Overview documents were published and closing a week and half after the sixth stakeholder reference group meeting.

Given the size of the asset, the stakeholder reference group believed the survey approach appropriately balanced efficiency and costs, compared to the alternative of writing their own detailed engagement report. The results would provide the AER with an assessment of the engagement program at a level appropriate to the size of the asset.

The stakeholder reference group agreed the breadth and depth of the survey questions across several meetings and a test run of the survey. To demonstrate genuine intent to deliver a robust engagement program, the questions were aligned to the requirements of the AER's 'Better Resets Handbook', as well as other topics the group agreed should be included – the final survey questions are shown in Appendix A. This resulted in a survey divided into seven themes:

1. Sincerity and genuineness of engagement
2. Accessibility, clarity and transparency of engagement
3. Consumer preferences and stakeholder support
4. Capital expenditure
5. Operating expenditure
6. Risk sharing
7. Price smoothing

To assist stakeholders to complete the survey, references to relevant stakeholder meetings and pages in the Draft Overview were included at the top of each survey page for each theme. Five rating options (Strongly agree, Agree, Neither agree nor disagree, Disagree and Strongly disagree) were presented to a range of relevant questions for each theme, along with a free text comment box. Recognising the composition of the stakeholder group changed over time, 'N/A' was also included as an option for each question. This inclusion also avoided the potential for meaningless results if participants were to otherwise sit on the fence using the 'Neither agree or disagree' rating.

To avoid any potential misinterpretation of the results or bias in reporting:

- A meeting was held with stakeholder reference group members after the survey closed, to clarify any ratings, comments and expectations in the lead up to submitting the Proposal, and
- APA's draft summary write-up, along with the raw survey data, was shared with the stakeholder reference group for their review with any feedback considered in the final Engagement Summary Report.

Five stakeholders completed the survey and a summary of the results by theme follows. To aid with interpretation of the results, the five rating options were aligned to a Likert Scale where 'Strongly agree' was rated 5 down to 'Strongly disagree' being rated as a 1. This allows each question to be rated as a weighted average score out of 5, noting N/A responses do not inform the weighted average.

Sincerity and genuineness of engagement

The five survey responses indicate a positive perception of the sincerity and genuineness of our engagement. Across most measures, respondents either Agreed or Strongly agreed with the statements presented, with a few neutral responses noted in relation to the stakeholder feedback questions.

Question	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A	Weighted average (out of 5)
APA explained concepts at a level you could understand.	40%	60%	–	–	–	–	4.4
APA respected and acknowledged your feedback.	40%	40%	20%	–	–	–	4.2
Your feedback has shaped/informed the proposal.	20%	40%	40%	–	–	–	3.8
The process provided you the ability to seek all the information you needed.	40%	60%	–	–	–	–	4.4
APA staff who attended the meetings reflected the commitment of the Board and Executives.	–	100%	–	–	–	–	4.0
The meetings were professional and of a high standard e.g. agendas and slides shared, action logs, catch-up meetings etc.	60%	40%	–	–	–	–	4.6

The professionalism and structure of engagement activities was the strongest-performing area (4.6/5), supported by consistent practices such as advance distribution of materials, maintenance of action logs, and high-quality meeting minutes.

Respondents also endorsed our ability to communicate complex concepts clearly (4.4/5) and to provide access to the information required for informed participation (4.4/5), indicating that stakeholders felt well-equipped to engage meaningfully in the process.

Stakeholders further agreed that APA was open, responsive, and respectful in its interactions and that their feedback was acknowledged (4.2/5). Qualitative comments indicate there were no restrictions on questions raised during engagement, and that relevant APA subject matter experts attended the sessions to present material and respond directly to stakeholder queries.

The only comparatively lower result relates to whether stakeholder feedback has shaped or informed the Proposal (3.8/5), with 40% of respondents selecting a neutral response. Qualitative feedback suggests this reflects the inherent constraints associated with a relatively small asset, where much of the capital and operating expenditure is non-discretionary, rather than dissatisfaction with the engagement itself. In this context, engagement supported understanding, scrutiny, and assurance, rather than materially altering expenditure outcomes or assessing whether the proposed expenditure is prudent and efficient.

Additional comments reinforcing the sincerity and genuineness of engagement included:

- Early co-creation of the engagement plan and agreement on stakeholder priorities;
- Flexibility in engagement, with additional sessions scheduled as needed;
- Opportunities for stakeholders to shape agendas and raise issues freely;
- High-quality meeting minutes supporting understanding and continuity of discussions.

Stakeholders also noted that the engagement was appropriately scaled to the size and complexity of the asset and aligned with, and in some cases exceeded, the principles set out in the AER's Better Resets Handbook, particularly in relation to the breadth, depth, and transparency of engagement.

Accessibility, clarity and transparency of engagement

The five survey results indicate that stakeholders found our engagement program to be accessible, clear and transparent with most respondents either agreeing or strongly agreeing with the statements presented. Importantly, given the commercial interests of some stakeholders, respondents indicated they felt comfortable contacting APA directly to share their views outside the group forums (4.5/5).

Question	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A	Weighted average (out of 5)
Meetings accommodated your areas of interest.	40%	40%	20%	–	–	–	4.2
APA focussed on the topics/areas where your input had the greatest influence.	40%	40%	20%	–	–	–	4.2
You had sufficient time to consider the issues.	40%	60%	–	–	–	–	4.4
You had sufficient opportunity to ask any questions.	40%	60%	–	–	–	–	4.4
If you experienced commercial barriers to speaking in the forums, you felt empowered to contact APA to share your views.	40%	40%	–	–	–	20%	4.5
Any questions you raised were answered.	40%	40%	–	–	–	20%	4.5
You were kept informed of engagement outcomes and any actions.	40%	60%	–	–	–	–	4.4

Responses indicate our engagement activities were appropriately tailored to stakeholders' interests (4.2/5) and focused on areas where stakeholders could have the greatest influence (4.2/5). Qualitative feedback noted that the engagement was "fit for asset size" and that the "bubble diagram" – which mapped topics against their impact on customers or prices and the level of stakeholder influence – was helpful in guiding engagement.

Respondents also agreed there was sufficient time to consider issues (4.4/5) and opportunity to ask questions (4.4/5), with feedback highlighting that participants had "total freedom" to raise questions and suggest additional topics.

Stakeholders further indicated that their questions were answered (4.5/5) and they were kept informed of engagement outcomes and actions (4.4/5). Qualitative comments referenced detailed meeting minutes, effective action tracking, and clear, timely and comprehensive follow-up to questions.

Consumer preferences and stakeholder support

Overall, the five survey results and accompanying comments demonstrate that APA has achieved a strong level of stakeholder support for the Access Arrangement, underpinned by effective delivery on engagement commitments and clear communication of outcomes. While it is recognised that the ability to demonstrate the balancing of diverse stakeholder views is inherently limited for the RBP, there is clear evidence that stakeholder input has been considered, documented, and transparently reflected in the Proposal.

Question	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A	Weighted average (out of 5)
The 'Overview of the draft Access Arrangement' has delivered on our shared commitments.	60%	40%	–	–	–	–	4.6
You understand how APA has balanced diverse stakeholder views.	–	80%	20%	–	–	–	3.8

All respondents either Agreed or Strongly agreed that the Draft Overview delivered on shared commitments (4.6/5). Qualitative feedback reinforces this result, noting that delivery on shared commitments is well reflected in the Draft Overview, with clear articulation of how stakeholder views have been considered against each stakeholder priority.

Perceptions of how we “balanced diverse stakeholder views” were more moderate (3.8/5), with 20% of respondents selecting neutral. Qualitative feedback indicates this result likely reflects the limited discretionary expenditure available for stakeholder influence, as well as relatively low observable engagement from some stakeholders, which in turn reduces the diversity of views. As a result, the engagement process for the RBP is relatively straightforward with less need to trade-off competing stakeholder perspectives compared to larger or more complex networks.



Ellengrove regulator station

Capital expenditure

Overall, the five results indicate that APA's capital expenditure engagement has been thorough, transparent, and focused on the right areas, particularly governance, cost estimation, and explanatory context. However, stakeholders' ability to form views on the reasonableness of the expenditure remains inherently constrained, reflecting the technical complexity of the subject matter and the recognised role of the AER in assessing prudence and efficiency.

Question	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A	Weighted average (out of 5)
You understand why the proposed capital expenditure is required.	20%	40%	40%	–	–	–	3.8
The proposed capital expenditure seems reasonable.	–	60%	20%	–	–	20%	3.0
The Draft Engagement Summary Report accurately captures stakeholder feedback on the proposed capital expenditure.	20%	40%	40%	–	–	–	3.8
You understand why the forecast capital expenditure in the current period (2022-27) is higher than the AER allowance	20%	60%	20%	–	–	–	4.0

The survey results indicate a more mixed view of capital expenditure engagement with lower average scores than other engagement themes – this reflects a higher proportion of neutral responses and one N/A response. There were no strongly negative views, with results largely concentrated between Agree and Neither agree nor disagree, indicating measured confidence rather than dissatisfaction.

Overall, 60% of respondents agreed they understand why the proposed capital expenditure is required (3.0/5) and that the Draft Engagement Summary Report accurately reflects stakeholder feedback (3.0/5). While 60% of respondents also agreed that the proposed capital expenditure appears reasonable, perceptions were more cautious (2.25/5), with 20% of respondents selecting neutral and one respondent selecting N/A. Similarly, understanding of why capital expenditure in the current period (2022–27) exceeds the AER allowance was more moderate, with a score of 2.8/5.

Qualitative feedback suggests our engagement was sufficiently comprehensive and generally effective with the neutral and N/A responses reflecting inherent constraints in the engagement process. In particular, the relatively small asset size and the non-discretionary nature of much of the proposed capital expenditure limited stakeholders' ability to meaningfully form or express views. Respondents indicated they were not in a position to endorse the forecasts and considered the AER to be best placed to assess prudence and efficiency.

As reflected in the 'What we heard and how we have responded' table, a key area of stakeholder interest was APA's historical tendency to underestimate forecast capital expenditure in its Proposals. This led to a focus on discussions around forecast accuracy, project estimation approaches (for example, AACE classification), and the governance processes underpinning investment decisions. Despite this focus, some stakeholders maintain concerns with the accuracy of capital expenditure forecasts.

At the time of the survey, one action remained outstanding, which has since been completed and the response shared with stakeholders.

Operating expenditure

Overall, the five results demonstrate that engagement on operating expenditure was effective, transparent, and aligned with regulatory good practice, enabling stakeholders to develop a clear understanding of both the methodology and outcomes. Compared to capital expenditure, stakeholders appear more comfortable forming a view on operating expenditure reasonableness, reflecting its relatively lower complexity and more standardised nature within the regulatory framework.

Question	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A	Weighted average (out of 5)
The proposed inputs to derive forecast operating expenditure seem reasonable.	40%	60%	–	–	–	–	4.4
The proposed operating expenditure seems reasonable.	40%	60%	–	–	–	20%	4.4
The Draft Engagement Summary Report accurately reflects stakeholder feedback.	40%	20%	40%	–	–	–	4.0

All respondents either Agreed or Strongly agreed that the inputs used to derive forecast operating expenditure, as well as the overall level of proposed expenditure, are reasonable (4.4/5 for both measures). This indicates that stakeholders found the forecasting approach to be clear, well-explained, and aligned with expectations.

Qualitative feedback supports this view, noting that the operating expenditure forecast appears consistent with the AER's Better Resets Handbook and applies the standard Base, Trend, and Step methodology, without step changes or category-specific forecasts. Historical evidence of overspending relative to the allowance was also noted as a concern.

Responses as to whether the Draft Engagement Summary Report accurately reflects stakeholder feedback on operating expenditure were more mixed, with a lower weighted average of 4.0/5 and 40% of respondents selecting neutral. Importantly, no respondents disagreed with the statement; the neutral responses likely reflect the absence of contentious issues in the operating expenditure forecast, rather than concern with how feedback was captured.

Overall, the relatively straightforward application of the AER's established operating expenditure forecasting approach appears to have supported stakeholder confidence, with the assessment of the correct application of the Base, Trend, Step methodology and prudence and efficiency again deferred to the AER.

Risk sharing

Overall, the five results indicate that our engagement on risk sharing has been effective in explaining the structure and intent of the proposed approach.

Question	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A	Weighted average (out of 5)
You support the proposed asset classes.	40%	60%	–	–	–	–	4.4
You support the proposed asset lives.	20%	20%	60%	–	–	–	3.6
You understand the revenue impact of the new 'Pipeline integrity' asset class.	40%	20%	40%	–	–	–	4.0
You understand how stakeholder feedback influenced risk sharing in the Access Arrangement.	–	100%	–	–	–	–	4.0
The Access Arrangement incorporates appropriate risk sharing between consumers and the business.	–	60%	40%	–	–	–	3.6

The survey results indicate a generally positive, albeit more measured, level of stakeholder confidence in APA's approach to risk sharing. Weighted average scores range from 3.6 to 4.4 out of 5, with a higher proportion of neutral responses on several questions, and no negative responses recorded.

Stakeholders expressed strong support for the proposed asset classes (4.4/5), with all respondents either agreeing or strongly agreeing. Similarly, all respondents indicated an understanding of how stakeholder feedback has influenced risk sharing arrangements (4.0/5).

However, support for the proposed asset lives (3.6/5), understanding the revenue impact of the new 'Pipeline integrity' asset class (4.0/5) and views on the overall balance of risk sharing between consumers and the business (3.6/5) each included a notable portion of neutral responses. Qualitative feedback suggests these results reflect residual uncertainty rather than disagreement.

Feedback highlighted that stakeholders were awaiting:

- Further modelling on the impact of shortening asset lives – this information has since been provided to stakeholders, and the Proposal notes that engagement on asset lives is ongoing and may result in changes at the Revised Proposal stage
- The AER's draft decision as to whether a Capital Expenditure Sharing Scheme should apply to RBP
- Clearer explanation of reference price sensitivity to potential over (or under) estimation of gas-powered generation demand in the later years of the forecast.

Price smoothing

The five survey results indicate a generally positive level of stakeholder support for our price smoothing approach, with most respondents agreeing that the proposed price path and revenue smoothing reflect stakeholder feedback (weighted average 4.0/5).

Question	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Weighted average (out of 5)
The proposed price path (and revenue smoothing) reflects stakeholder feedback heard.	40%	40%	–	20%	–	4.0

Responses were concentrated in Agree and Strongly agree, with one respondent selecting Disagree. This likely reflects that pricing is an area where customers preferences differ, depending on factors such as whether they are exposed to the reference service tariff or contract pricing, with contract renewal timing also influencing preferred price paths.

Qualitative feedback indicates a general willingness to accept the AER's decision on demand forecasts, recognition that GPG users will be able to pass through higher tariffs in the outer years, and agreement that the proposed price path aligns with feedback provided during stakeholder engagement. However, it is noted that these views were primarily expressed by customer advocates rather than RBP's direct customers.

One large customer has since indicated a preference for a higher upfront price increase in the first year, followed by minimal real price increases thereafter, on the basis this would provide greater medium-term price stability compared to a series of incremental increases.

To ensure a broader perspective on price smoothing preferences, we actively engaged directly with RBP customers ahead of publishing our Proposal to ensure the proposed price path appropriately considers a range of customer views.

Stakeholders also requested a clearer explanation of the revenue smoothing adjustment. This feedback has been incorporated into the Proposal, with additional explanation provided on how the smoothing adjustment is applied and the factors influencing its magnitude.

Appendix A - Stakeholder survey questions

These questions are about the **sincerity and genuineness** of APA's engagement

1. Thinking about APA's engagement for the 2027-32 Roma to Brisbane Pipeline Access Arrangement ...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A
APA explained concepts at a level you could understand.	☐	☐	☐	☐	☐	☐
APA respected and acknowledged your feedback.	☐	☐	☐	☐	☐	☐
Your feedback has shaped/informed the proposal.	☐	☐	☐	☐	☐	☐
The process provided you the ability to seek all the information you needed.	☐	☐	☐	☐	☐	☐
APA staff who attended the meetings reflected the commitment of the Board and Executives.	☐	☐	☐	☐	☐	☐
The meetings were professional and of a high standard e.g. agendas and slides shared, action logs, catch-up meetings etc.	☐	☐	☐	☐	☐	☐

2. Please provide any comments related to the sincerity and genuineness of APA's engagement

These questions are about the **accessibility, clarity and transparency** of engagement

3. Thinking about APA's engagement for the 2027-32 Roma to Brisbane Pipeline Access Arrangement ...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A
Meetings accommodated your areas of interest.	☐	☐	☐	☐	☐	☐
APA focussed on the topics/areas where your input had the greatest influence.	☐	☐	☐	☐	☐	☐
You had sufficient time to consider the issues.	☐	☐	☐	☐	☐	☐
You had sufficient opportunity to ask any questions.	☐	☐	☐	☐	☐	☐
If you experienced commercial barriers to speaking in the forums, you felt empowered to contact APA to share your views.	☐	☐	☐	☐	☐	☐
Any questions you raised were answered.	☐	☐	☐	☐	☐	☐
You were kept informed of engagement outcomes and any actions.	☐	☐	☐	☐	☐	☐

4. Please provide any comments relating to accessibility, clarity and transparency of APA's engagement

These questions are about consumer preferences and stakeholder support

- A summary of our engagement approach (from our 'Engagement Plan') can be found in the **Draft Engagement Summary Report**, along with a more fulsome summary of our engagement with stakeholders in the **What we heard and how we have responded** section.
- A high-level view of both these components can be found in the **Our engagement for the 2027-32 draft Access Arrangement** section of the **Draft Overview** document.

5. Thinking about APA's engagement for the 2027-32 Roma to Brisbane Pipeline Access Arrangement ...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A
The 'Overview of the draft Access Arrangement' has delivered on our shared commitments.	☐	☐	☐	☐	☐	☐
You understand how APA has balanced diverse stakeholder views.	☐	☐	☐	☐	☐	☐

6. Please provide any comments related to how APA has reflected consumer preferences and stakeholder support in the Overview of the draft Access Arrangement

These questions relate specifically to capital expenditure

- A summary of our current period's (2022-27) capital expenditure can be found on Pages 7 and 19 of the **Draft Overview**.
- An overview of our planned capital expenditure programs for 2027-32 can be found on page 15, and additional commentary and expenditure details on pages 18 and 19 of the **Draft Overview**.
- Our expenditure governance process and capital expenditure were discussed in stakeholder meetings 2, 3, 4 and 5.
- A summary of the engagement outcomes for operating expenditure can be found in the 'Affordability' section of the **What we heard and how we have responded** section of the **Draft Overview** and a more fulsome summary in the same section of the same table in the **Draft Engagement Summary Report**.

7. Thinking about APA's engagement for the 2027-32 Roma to Brisbane Pipeline Access Arrangement ...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A
You understand why the proposed capital expenditure is required.	☐	☐	☐	☐	☐	☐
The proposed capital expenditure seems reasonable.	☐	☐	☐	☐	☐	☐
The Draft Engagement Summary Report accurately captures stakeholder feedback on the proposed capital expenditure.	☐	☐	☐	☐	☐	☐
You understand why the forecast capital expenditure in the current period (2022-27) is higher than the AER allowance	☐	☐	☐	☐	☐	☐

8. Please provide any comments related to APA's engagement on capital expenditure

These questions relate specifically to operating expenditure

- A summary of our current period's (2022-27) operating expenditure can be found on Page 7 of the **Draft Overview** document.
- The derivation of our proposed operating expenditure for 2027-32 can be found on pages 20 and 21 of the **Draft Overview**.
- Operating expenditure was discussed in stakeholder meetings 4 and 5.
- A summary of the engagement outcomes for operating expenditure can be found in the 'Affordability' section of the **What we heard and how we have responded** section of the **Draft Overview** and a more fulsome summary in the same section of the same table in the **Draft Engagement Summary Report**.

9. Thinking about APA's engagement for the 2027-32 Roma to Brisbane Pipeline Access Arrangement ...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A
The proposed inputs to derive forecast operating expenditure seem reasonable.	☐	☐	☐	☐	☐	☐
The proposed operating expenditure seems reasonable.	☐	☐	☐	☐	☐	☐
The Draft Engagement Summary Report accurately reflects stakeholder feedback.	☐	☐	☐	☐	☐	☐

10. Please provide any comments related to APA's engagement on operating expenditure

These questions relate specifically to risk sharing between customers and APA - the tools available to share RBP risks are **asset lives and incentive schemes** (like the Efficiency Carryover Mechanism)

- A summary of our proposed new 'Pipeline integrity' asset class can be found on page 18 of the **Draft Overview**.
- The Efficiency Carryover Mechanism result is summarised on page 25 of the **Draft Overview** and the immaterial amount is shown in the 'Revenue adjustments' line on page 13.
- A summary of the engagement outcomes concerning the 'Customer and community risk' priority and 'Capital expenditure overspends' can be found in the **What we heard and how we have responded** section of the **Draft Overview** and a more fulsome discussion can be found in the same table of the **Draft Engagement Summary Report**.
- We discussed risk sharing in stakeholder meetings 3 and 5.

11. Thinking about APA's engagement for the 2027-32 Roma to Brisbane Pipeline Access Arrangement ...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	N/A
You support the proposed asset classes.	☐	☐	☐	☐	☐	☐
You support the proposed asset lives.	☐	☐	☐	☐	☐	☐
You understand the revenue impact of the new 'Pipeline integrity' asset class.	☐	☐	☐	☐	☐	☐
You understand how stakeholder feedback influenced risk sharing in the Access Arrangement.	☐	☐	☐	☐	☐	☐
The Access Arrangement incorporates appropriate risk sharing between consumers and the business.	☐	☐	☐	☐	☐	☐

12. Please provide any comments on APA's engagement on risk sharing

These questions relate to **price smoothing** (and revenue smoothing)

- Our revenue requirement is outlined on pages 13 and 14, our forecast demand on pages 16 and 17 and price smoothing on page 22 of the [Draft Overview](#).
- A summary of the engagement outcome for the Price Path can be found in the 'Affordability' section of the **What we heard and how we have responded** section of the [Draft Overview](#) and a more fulsome summary in the same section of the same table in the [Draft Engagement Summary Report](#).
- We discussed price smoothing in meeting 5.

13. Thinking about APA's engagement for the 2027-32 Roma to Brisbane Pipeline Access Arrangement ...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
The proposed price path (and revenue smoothing) reflects stakeholder feedback heard.	☐	☐	☐	☐	☐

14. Please provide any comments on APA's 'Revenue smoothing' engagement

Glossary

Term	Meaning
2022–27	The current Access Arrangement period beginning 1 July 2022 and ending on 30 June 2027
2027–32	The Access Arrangement period beginning 1 July 2027 and ending on 30 June 2032
AER	Australian Energy Regulator
CESS	Capital Expenditure Sharing Scheme
Draft Overview	The 'Overview of the draft 2027–32 Access Arrangement' and the 'Draft Engagement Summary Report' published on 17 April 2026 for stakeholder review and feedback.
GPG	Gas Powered Generation
ILI	In-line Inspection
LNG	Liquefied Natural Gas
Proposal	The suite of documents that comprise the 2027–32 RBP Access Arrangement proposal
RAB	Regulated Asset Base
RBP	Roma Brisbane Pipeline
SP	Security Posture
SOCI	Security of Critical Infrastructure