

1 April 2026

[REDACTED]
The Australian Energy Regulator
Level 16, 2 Lonsdale St,
MELBOURNE VIC 3000

By email: [REDACTED]

Dear [REDACTED],

Re: Request for AEMC input on the classification decision of the Sturt Plateau Pipeline

I refer to the Australian Energy Regulator (AER)'s request, dated 2 March 2026, seeking input from the Australian Energy Market Commission (AEMC) regarding whether the Sturt Plateau Pipeline (SPP) should be classified as a transmission or distribution pipeline. This is to assist the AER in fulfilling its obligations under rule 29F(3) of the NGR.

Having considered the APA SPP Pty Ltd (the applicant) application to the AER and public information about the pipeline, we consider that the pipeline appears to have features consistent with transmission pipelines, and this would be the preferable classification.

In forming this opinion, we observe that:

- the applicant considers this pipeline to be a transmission pipeline
- the pipeline is approximately 37km long, the diameter is DN300 and the Maximum Allowable Operating Pressure (MAOP) is 10.2MPag
- the primary purpose of the SPP is to receive gas from the Tamboran Gas Production Facility and transport it to APA's Amadeus Gas Pipeline (AGP), the SPP is a linear configuration
- 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
- 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
- the pipeline does not reticulate gas within a market (which is the primary function of a distribution pipeline (s13 (1) of the NGL)).

Thank you for including the AEMC in your consultation on the classification of SPP. We ask that the AER provide a copy of the decision so that we can update the pipeline register.

Yours sincerely,

[REDACTED]

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Australian Energy Market Commission