

18 August 2021

Sebastian Roberts
General Manager
Australian Energy Regulator
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By email: RBP2022@aer.gov.au

Dear Sebastian

Roma to Brisbane Pipeline – Access arrangement 2022-27

Jemena welcomes the opportunity to provide feedback in response to APT Petroleum Pipelines Pty Limited's (**APTPLL**) access arrangement proposal for the Roma to Brisbane Pipeline's (**RBP**) 2022-27 regulatory period (**AA proposal**).

Jemena owns and operates a diverse portfolio of energy assets across eastern and northern Australia. With more than \$12 billion worth of major utility infrastructure, we supply millions of households and businesses with essential services every day. In Queensland, our assets include the Darling Downs Pipeline (**DDP**), Queensland Gas Pipeline and Atlas and Roma North gas processing facilities and pipelines.

Jemena provides this submission in response to a request from the Australian Energy Regulator for information about the DDP and its role in providing gas transportation services to Wallumbilla.

Darling Downs Pipeline configuration

The DDP comprises three interconnected, bi-directional pipelines, with a map available on Jemena's website¹:

- DDP 133 – running from Origin's Darling Downs Power Station at its eastern end to APLNG's Talinga compression facility at its western end
- DDP 134 – running from Talinga at its eastern end to Wallumbilla at its western end
- DDP 90 – running from Spring Gully at its northern end to Wallumbilla at its southern end.

We charge for access to each of these pipeline segments individually, and publish tariffs for available capacity on our website.²

Comparability of westbound pricing

In order to deliver gas from DDP 133 to Wallumbilla, access to each of DDP 133, DDP 134 and DDP 90 would be required. The total cost of transportation for these three segments based on our published tariffs would be \$0.4580/GJ/day.

¹ <https://jemena.com.au/documents/pipeline/ddp-map.aspx>

² <https://jemena.com.au/documents/pipeline/ddp-tariff.aspx>

The movement of gas westerly from DDP 133 to DDP 134 would also require access to compression at Talinga. Jemena does not own the Talinga compression facility. This facility is currently utilised by APLNG for compression on its own pipeline, and we understand that it does not provide services to third parties.

Capacity availability

Jemena has recently reassessed our interpretation of the reporting requirement which relates to the uncontracted capacity outlook information on the Gas Bulletin Board,³ and have subsequently revised our reported uncontracted capacity outlook downward to reflect the limited availability of firm westbound capacity.

In particular, we have amended the westbound capacity available on DDP 133⁴ to zero for the 36 month outlook period, as existing shippers have rights to the entire capacity of this segment throughout this period. These amended capacity outlook values were updated on our website on 5 August 2021,⁵ and we are currently in the process of updating the corresponding values on the Gas Bulletin Board.

Further information

We would be happy to provide any further information the Australian Energy Regulator may require. If you wish to discuss this submission further, please contact James Harding, Gas Markets Regulation Manager, on [REDACTED] or [REDACTED].

Yours sincerely

[REDACTED]

Ana Dijanosic
General Manager Regulation

³ National Gas Rules, r. 175.

⁴ Shown on the Gas Bulletin Board outlook as receipt at Ruby and delivery at Talinga GPF.

⁵ <https://jemena.com.au/redirect/pipelines-document>