



**APA Group**  
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10 September 2024

Mr Anthony Lean  
Secretary  
NSW Department of Climate Change, Energy, the Environment and Water  
52 Martin Place  
SYDNEY NSW 2000

**Lodged via email: [energy.consult@dpie.nsw.gov.au](mailto:energy.consult@dpie.nsw.gov.au)**

Dear Mr Lean,

**Re: APA Submission to NSW Pipelines and Gas Supply Legislation Amendments Consultation Paper**

Thank you for the opportunity to comment on the NSW Pipelines and Gas Supply Legislation Amendments Consultation Paper (Consultation Paper) published in August 2024.

APA is an ASX listed owner, operator, and developer of energy infrastructure assets across Australia. Through a diverse portfolio of assets, we provide energy to customers in every state and territory. As well as an extensive network of natural gas pipelines, we own or have interests in gas storage and generation facilities, electricity transmission networks, and 692 MW of renewable generation and battery storage infrastructure.

APA supports the NSW Government in its efforts to ensure that the regulatory framework for gas pipelines and networks remains fit for purpose. On 30 August 2024 we also made a submission to the NSW Government on the development of policies and actions for growing a domestic renewable fuel industry in NSW.

We have reviewed the Consultation Paper and can provide feedback on the following issues:

**Suspension and abandonment**

APA is very familiar with the technical requirements for the decommissioning and abandonment of pipelines and networks. Our own procedures and practices are aligned with Australian Standards and best industry practice.

Consistent with other jurisdictions, we support legislative amendments that ensure suspension, decommissioning and abandonment are undertaken in accordance with the requirements of AS 2885.

**Drafting of future legislation**

The Consultation Paper foreshadows future amendments to the Pipelines and Gas Supply Acts following consideration of stakeholder feedback. Should any legislative amendments be approved by the NSW Parliament, changes to the Pipelines Regulations and Gas Supply Regulations may also be required. The Consultation Paper indicates that any changes to the Regulations will also be consulted on.

However, the Consultation Paper does not indicate whether any draft legislation will be consulted on prior to being submitted to the NSW Parliament. We consider there would be significant benefit for the NSW Government to consult on exposure legislation prior to this step occurring. This could involve a targeted consultation with stakeholders that lodge submissions to this process.



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We look forward to working with the NSW Government as it updates the regulatory framework. If you wish to discuss our submission in further detail, please contact Kerry Duffy on [REDACTED] or [REDACTED].

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Shipp'.

**Suzanne Shipp**  
General Manager – Operations and Maintenance  
[REDACTED]

10/9/2024 | 2:54 PM AEST