



25 August 2022

Submission: Amending the Australian Energy Regulator Wholesale Market Monitoring and Reporting Framework consultation

The Australian Pipelines and Gas Association (APGA) represents the owners, operators, designers, constructors, and service providers of Australia's pipeline infrastructure, connecting natural and renewable gas production to demand centres in cities and other locations across Australia. Offering a wide range of services to gas users, retailers and producers, APGA members ensure the safe and reliable delivery of 28 per cent of the end-use energy consumed in Australia and are at the forefront of Australia's renewable gas industry, helping achieve net-zero as quickly and affordably as possible.

APGA welcomes the opportunity to contribute to the Federal Department of Climate Change, Energy, the Environment and Water (**DCCEEW**) consultation on Amending the Australian Energy Regulator Wholesale Market Monitoring and Reporting Framework (the **Consultation**).

APGA is concerned about the potential cost impacts to customers of introducing Wholesale Market Monitoring (WMM) into the NGL. Monitoring and reporting measures are not a costless exercise and costs for industry participants are ultimately borne by customers. Further, there is potential for duplication of monitoring and reporting measures between existing NGL transparency measures and the WMM. Focus should be placed on avoiding duplication of processes and minimising cost.

To discuss any of the above feedback further, please contact me on +61 422 057 856 or jmccollum@apga.org.au.

Yours Sincerely,

A handwritten signature in dark ink, appearing to read "JM", is written over a light grey, semi-transparent rectangular background.

JORDAN MCCOLLUM
National Policy Manager
Australian Pipelines and Gas Association