

Australian Energy Markets Commission

17 April 2025

Submitted online: [www.aemc.gov.au](http://www.aemc.gov.au)

**AEC Submission to AEMC National Gas Amendment (ECGS Notice of closure for gas infrastructure) – Consultation paper**

The Australian Energy Council (AEC) welcomes the opportunity to make a submission in response to the AEMC National Gas Amendment (ECGS Notice of closure for gas infrastructure) – Consultation paper.

The Australian Energy Council is the peak industry body for electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. AEC members generate and sell energy to over 10 million homes and businesses and are major investors in renewable energy generation. The AEC supports reaching net-zero by 2050 as well as a 55 per cent emissions reduction target by 2035 and is committed to delivering the energy transition for the benefit of consumers.

The AEC whilst supportive of the intent of this rule change, because there are currently no explicit requirements for infrastructure owners and operators to provide the market with timely advanced notice of their plans to close assets, questions the technical ability of all these assets to accurately notify a closure date. Whilst agreeing that the relative importance of gas infrastructure assets provides a reasonable basis for requiring formal advanced notice of closure this must be undertaken in a way that these assets are technically able to comply. The AEC is also supportive of the proposed scope of this rule change.

Of the proposed options, we do not support Option 3. While we consider the other two options to be reasonable, we prefer Option 2 as it allows for notification at any time on the Gas Bulletin Board (GBB) and therefore has the potential to benefit from regular updates. Whereas under Option 1, the GSOO is an annual publication and any notification would require an AEMO update to the GSOO.

One concern we have is whether or not production fields or wells are captured by the proposed rule change. The GBB requires production, pipeline, compression and storage facilities with nameplate capacity of 10 TJ/day or more to be included. Under the National Gas Rules (NGR) Part 18 Division 1 Rule 141 (1), “a production facility means a facility where natural gas is produced such that it is in a form suitable for injection into one or more BB pipelines.” We think it would be helpful if the AEMC could provide further clarification as to what is included with respect to a production facility or a compression facility ie, are individual wells or fields captured. If the intent of the rule change is to capture fields and wells, then we think they should be excluded because their retirement is primarily determined by geology and geophysics and therefore technically complex to determine, which is in contrast to other gas infrastructure.

Any questions about this submission should be addressed to [peter.brook@energycouncil.com.au](mailto:peter.brook@energycouncil.com.au) or by telephone on (03) 9205 3116.

Yours sincerely,



**Peter Brook**  
Wholesale Policy Manager  
Australian Energy Council