

Dear AEMO Reform Development & Insights,

Thank you for the opportunity to provide our submission for the first round of the consultation around the Structure of Gas Participants Fees.

APA would like to express its preference for Option 1, proposed for the East Coast Gas System Reform Program fees.

The Option 1 proposes to utilise the existing GBB fee structure for ECGS Stage 1 costs, which is a sound approach in reflection to the ECGS Reform application. In its essence, the new ECGS Reporting Obligation extends the pre-existing GBB reporting with the aim to monitor the supply-demand gas balance in the market and signal any potential shortfalls.

The Option 1 benefit is in its simplicity and reliance on the existing GBB fee structure. Opposed to that, Option 2 would require additional reporting to be developed and deployed. The cost of the resources and time allocation to create the Option 2 reporting will likely outweigh the ECGS Reform Stage 1 quoted costs without any additional benefits.

Regarding Questions 1-6 in the consultation, APA's understanding is that no changes are proposed to the existing fee structures for DWGM, STTM, Retail market, GBB, GSOO, ECA, CTP, DAA, CTP and DAA registration fee, OTS, and as such, the feedback on those fees structures should not be applicable for APA, but rather those gas participants that impacted by those fees.

Please contact me on marketsmanager@apa.com.au or 0420724858 for any further queries regarding the above.

Sincerely,



Kate Lucas
Markets Manager