



AGL Energy Limited

T 02 9921 2999

F 02 9921 2552

[agl.com.au](https://www.agl.com.au)

ABN: 74 115 061 375

Level 24, 200 George St

Sydney NSW 2000

Locked Bag 1837

St Leonards NSW 2065

12 September 2024

Essential Services Commission of South Australia

GPO Box 2605

Adelaide SA 5001

Submitted via webform: <https://www.escosa.sa.gov.au/approach/send-a-submission>

Gas Distribution Code Draft

AGL Energy (AGL) welcomes the opportunity to provide feedback to the Essential Services Commission of South Australia (the Commission) in response to the draft Gas Distribution Code.

AGL is a leading integrated essential service provider, delivering 4.3 million gas, electricity, and telecommunications services to our residential, small, and large business, and wholesale customers across Australia. AGL retails gas to over 1.5 million customers across all mainland Australian states, including approximately 143,000 gas customers in South Australia.¹ As AGL continues to support and expand decarbonisation and electrification opportunities for its customers, it also remains a critical priority for AGL to deliver secure, reliable, and affordable energy options to its existing customers.

AGL supports the Commission's review of the regulatory instruments that apply to Australian Gas Networks (AGN). AGL has carefully reviewed the draft revised version of the Gas Distribution Code and makes the following observations for the Commission's consideration:

Section	Requirement	AGL Comment
Definitions	Disconnection Services: means the following services provided by the distributor: being disconnection – meter not removed and disconnection – meter removed and abolishment	This definition may not adequately capture 'street disconnection' services carried out by the distributor where there is no access to the customer's premises/meter.
Definitions	Interruption: means an unplanned interruption of a customer's gas distribution service caused by operator actions, third party damage or asset conditions.	This definition should contemplate not only unplanned interruptions but also scheduled or planned interruptions, including those carried out for network field works.

¹ [AGL ESG Data Centre FY24](#): 143,282 gas customers in South Australia as at 30 June 2024, including residential, small business, and commercial and industrial customers.



2.1	Operating Pressure: the distributor must use its best endeavours to keep the operating pressure between 2.75 kPa and 3 kPa for medium pressure mains and high-pressure mains.	The Commission may need to consider whether this drafting adequately caters to high pressure delivery of gas to large customers. The current wording suggests that only residential customers are covered by these provisions, however, large customers are often also high-pressure customers.
2.2	Protection and non-interference information: The distributor must provide certain information relating to distribution system requirements to a retailer "within 10 business days of the request being made."	AGL recommends that the Commission amend the requirement to read "within 10 business days of the request being made or on the date agreed to by the distributor and the retailer ". This will allow a degree of flexibility for both parties to request and provide information at an appropriate time determined by the distributor and retailer.
2.3	Maintenance of the network: specifies circumstances under which the distributor can remove or disable parts of its distribution system.	AGL recommends an addition of a fourth exclusion under 2.3.2 linked to redirecting assets for road works and other projects of a similar nature or redirecting supply via another section of pipe, major works (building assets, freeways) with lots of relocation work.
2.5.1(iii)	Information about Disconnection Services: A distributor must provide information on its website about the price of each type of disconnection service (including information about how distributor's tariffs are applied at the discretion of each retailer).	<p>If it is proposed that the distributor should provide the prices for its disconnection services directly on its website, then they should ensure that all charges (e.g. including AEMO charges) are already factored into the published price.</p> <p>AGL has experienced other networks charging customers for abolishments and not including all charges, some of which may be levied against the retailer, who in turn has no customer to pass the charge onto.</p>

If you would like to discuss any aspect of AGL's submission, please contact Valeriya Kalpakidis at vkalpakidis@agl.com.au.

Yours sincerely,

A handwritten signature in black ink that reads 'Liam Jones'.

Liam Jones
Senior Manager Policy and Market Regulation
AGL Energy