

19 September 2025

Sent via webform

NSW DCCEEW - Gas Supply (Safety and Network Management) Amendment Regulation 2025

Q1a. What are your overall thoughts on the Gas Supply (Safety and Network Management) Amendment Regulation? Is there anything specifically of interest? Please note explicit questions on each section will follow.

The Suspension and Abandonment Regulation is premature and both metro and regional networks are still growing and serving customers. Similar matters are before other regulatory bodies and working with them and Industry rather than through these Regulations and unpublished Guidelines would allow for a constituent cross-jurisdictional approach that achieves the best possible outcomes.

Q2. Do you have any concerns or foresee any issues with the proposed clarified gas network suspension and abandonment definitions and their requirements? If yes, which definition and /or requirement and why?

Suspension definition

The suspension definition as written is likely to capture business as usual activities that do not warrant submission of a suspension plan and require submission of a significant number of suspension plans.

Suspension requirements

They should also include reference to AS 4645 for the lower pressure pipelines in use. These requirements may put NSW operators in a unique position which does not align with other States. Approaching this through Australian Standards with Industry and Regulators nationally would be better.

Abandonment definition

The abandonment definition is very broad and appears likely to capture regular operational maintenance activities such as mains renewals and relocations (e.g. in the event of a new rail corridor) where a new main is laid and the old is left in a disconnected, capped, and safe state. The definition should include how network users are affected by the abandonment and if they are to be reconnected to the network, the scope of this definition should not capture operational works.

Abandonment requirements

They should also include reference to AS 4645 for the lower pressure pipelines in use. These requirements may put NSW operators in a unique position which does not align with other States. Approaching this through Australian Standards with Industry and Regulators nationally would be better.

Q3. Do you have any concerns or suggestions for what should be included in a Gas Network Suspension or Abandonment Plan?

There are other methods available for introducing a Suspension or Abandonment Plan. The Australian Standards already referenced in the proposed regulatory change would be a better suited avenue for the definitions and requirements. Adjusting this regulatory amendment to defer to the relevant Standards would have several benefits:

- A universal or cross-jurisdictional approach to suspension and abandonment allows the Gas Technical Regulators Group to work industry on the development of national standards and allows for better understandings from diverse operations.
- Flexible and up-to-date approaches – AS 2885 and AS 4645 are both already kept by the industry to the highest standards.
- Allowing regulators and distributors and other interested parties to work together on creating an optimal plan without risk of duplication or limitations by other factors.
- Industry guidelines are written and updated in-line with best practice. This process feeds into keeping the Standards relevant with the latest information and practices.
- Decreases the compliance complexity for network operators with assets in multiple jurisdictions.

The level of detail in the regulation is not enough and would require too many amendments over time to keep relevant. Additionally, without including the proposed guidelines at the same time to be read in conjunction with the Regulation it is not possible to have a full picture of how this process would work.

Q4. Do you have any specific concerns or considerations regarding the lead time required for each stage of the process to surrender or abandon a network and/or surrender a licence?

There should be a minimum amount of time for the Secretary and Department to review the plans. However, the broad definitions given to Suspension and Abandonment and the long lead times given here could greatly increase the operational timeframes and costs of regular works. Another method of implementing this part of the regulation would be if the Plan submitted by the network operator could include timeframes for each stage of the proposed works that better align with the scale and type of activity to be undertaken while still addressing the need for the Secretary to review the plan.

Q5. Are there any other aspects and practical considerations of suspension or abandonment of gas networks you believe should be addressed?

Again there is a potential issue with the broadness of these Regulations being introduced at this time. A similar approach undertaken in Western Australia prior to the decommissioning of the Esperance network has increased the number of notifications sent for operational works. The adherence to enforcement of the regulation as it is proposed leaves too much to interpretation and would be better addressed in the Australian Standards. AS 4645 is currently being re-drafted for publication in 2027, as there is no current timeframe for decommissioning specific parts of any network in NSW there is time to work with industry and other partners on the best approach to Suspension and Abandonment Plans in the Standards.

There are learnings to be taken from other jurisdictions such as the decommissioning of the Esperance network and the current planning of the decommissioning of the ACT and several small networks in regional Victoria. There are risk assessments processes from these activities that will help in the safe management of gas networks that will make their way into industry guidelines, best practices, formal safety assessments, and the relevant Australian Standards. Referencing these works instead of legislating would ensure the best outcomes for the safe management of NSW gas networks.

There are limited opportunities to learn about the technical and regulatory challenges of abandoning or decommissioning from international settings as it has not yet occurred at scale.