



Name: APA Group

Submission date: 6/06/2025

1. Reduce the cost of meeting carbon targets

1. What could be done to improve the cost-effectiveness and alignment of policies to reduce emissions across the industrial, electricity and transport sectors?

To help make the energy transition smoother, it would be helpful for there to be greater alignment between state regulatory frameworks. Recently, there has been increasing divergence with states pursuing their own energy policies and targets, that do not always align with other states or federal objectives.

National harmony across regulatory frameworks and jurisdictional collaboration will help reduce administrative costs, timeframes and approval pathways and processes for national energy businesses.

2. Are there gaps in the emissions-reduction policies in the industrial, electricity and transport sectors which should be addressed?

Gas-powered generation is expected to play a key role in navigating an orderly and secure energy transition, as well as helping Australia meet its net zero ambition targets. As jurisdictions and market bodies prioritise the early retirement of coal as the fastest path to emissions reduction, investment in GPG, new gas supply and infrastructure becomes essential.

GPG will play a key role in firming electricity supply as coal exits the system and will be critical during peak demand periods. This firming capacity enables faster and greater uptake of renewable energy. AEMO's 2024 Integrated System Plan (ISP) forecasts 15GW of GPG by 2050—a 50% increase from the 2022 ISP. With 9.3GW of the current 11.5GW of GPG expected to retire, about 12GW of new GPG is needed.

Further analysis since the 2024 ISP suggests even higher needs. A December 2024 report by Griffith University found over 20GW of GPG may be required by the late 2030s—25% more than AEMO's forecast—to maintain reliability as coal exits.

For the 12-17GW of new GPG needed to meet the outcomes forecast by the 2024 ISP and Griffith University reports, we need to increase investment in our GPG industries and help operators deliver the capacity needed.

However, uncertainty in GPG operations—due to gas prices, weather, outages and asset build delays—combined with limited policy support makes investment decisions difficult. Long-term investment signals are urgently needed.

While schemes like the Capacity Investment Scheme support renewables, GPG lacks equivalent incentives. South Australia's proposed Firm Energy Reliability Mechanism (FERM) is a positive step, offering long-term contracts for dispatchable capacity, providing greater certainty than WA's short-term Reserve Capacity Mechanisms.

The Federal Government's review of NEM market settings, with a final report due in December 2025, is a key opportunity. We support reforms that create long-term certainty for long-duration firm capacity, helping ensure renewables can thrive while maintaining system reliability. This will help support the development of renewable energy projects, ultimately helping to achieve emissions reduction targets.

3. Are there any duplicative emissions-reduction policies in the industrial, electricity and transport sectors which could be streamlined?

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2. Speed up approvals for new energy infrastructure

1. Are planning and approvals processes for large energy infrastructure taking too long? If so, what causes the most delay?

APA Response to Questions 4 and 5.

Early clarity on a defined regulatory pathway is critical to investor and developer confidence. It is critical that this is at all levels of government; local, state and Commonwealth, to greater support schemes that function as a facilitator, streamlining processes and speeding up project completion.

While it might not be feasible to combine all agency conversations into a single process, streamlining interagency interactions is essential to increase efficiencies. A co-ordinated facilitation service across all levels of government would be helpful provided the service works as a unified team to provide clearly defined:

- approvals process flows
- consultation requirements
- timeframes
- clear criteria by which projects would be approved for each level of government and for each geographic jurisdiction.

2. How can planning and approvals processes be sped up without unduly compromising regulatory standards?

The participant did not respond to this question.

3. Should clean energy projects be treated differently to other projects for the purpose of environmental and other approvals? If so, how?

While we support efficient timeframes for approval processes, we do not think this should be limited to clean energy projects. All energy projects that assist in achieving net zero emission targets in a safe and reliable fashion should be subject to the same, technology agnostic, approval processes.

4. What can be done to build local community support for new energy infrastructure projects?

Prior to the selection of energy infrastructure projects, community feedback should be considered in the establishment of regions where energy development is set to occur. In many cases, a project proponent starts their relationship with local communities and landholders on the back foot, as the priority region is already locked in.

Infrastructure proponents have a responsibility to collaborate with landholders and communities to consider their views but often have no scope for genuine consultation with regards to the designated zone/area. Earlier government consultation with landholders and communities in the selection and development of priority regions would help build greater support for energy developments and facilitate improved engagement between project proponents and communities.

Current approval and planning processes can inadvertently hinder a project's ability to develop strong relationships with local communities. A focus on demonstrating targeted consultation and support at a particular point in time, for example an approval point, can result in a polarising 'for or against' framing of a project, rather than a process which works through concerns, and achieving positive outcomes in impacted communities.

When multiple and/or concurrent projects occur within a priority region, community messaging varies individually amongst specific projects. Coordinated regional messaging across the entire priority region would benefit the communities and the project proponents. Similarly, cumulative impacts are assessed separately for each project and tend to overlook the cumulative impacts across the priority region (e.g., adequacy of existing public services such as schools or emergency services to support the influx of people). A coordinated region-wide cumulative impact assessment of all projects would be beneficial.

Projects would more effectively contribute to long term and sustainable outcomes if communities and regions were better supported to develop clear priorities and long-term plans for development prior to commencement of a project within priority regions. This would support a movement away from 'quick wins', for example investment in community infrastructure, towards more sustainable contributions which support regional growth and economic development.

5. Please outline any evidence showing the productivity benefits of faster approvals for energy projects.

The participant did not respond to this question.

3. Encourage adaptation by addressing barriers to private investment

1. What are the barriers and enablers impacting decisions by owner-occupiers, landlords and developers about how housing is built and updated over time so that it is resilient to the effects of climate change?

The participant did not respond to this question.

2. What information do people need to make decisions about where to live, how to build and how to upgrade their homes to appropriately factor in climate change?

The participant did not respond to this question.

3. What are the most cost-effective retrofitting options for improving the resilience of Australia's existing housing stock? What are their costs and benefits?

The participant did not respond to this question.

4. What role might minimum standards play in ensuring the resilience of Australia's housing stock?

The participant did not respond to this question.

5. The impacts of climate change are being factored into the regulation of where and how houses are built in different ways around Australia. What does leading practice look like? Where is there room for improvement? Are there lessons we can learn from other countries?

The participant did not respond to this question.