

7 November 2023

Mr Jai Thomas
Deputy Director General- Coordinator of Energy
Energy Policy WA
Sent via email: EPWA-submissions@dmirs.wa.gov.au

Dear Jai,

Re: Proposed licence exemptions for the construction of electricity and gas distribution systems by third party developers.

Thank you for the opportunity to provide a submission to the proposed licence exemptions for the construction of electricity and gas distribution systems by third party developers.

ATCO is the owner and operator of the Mid-West and South-West gas distribution system, the largest reticulated gas distribution system in WA, as well as gas networks in Kalgoorlie and Albany. Our networks currently supply over 800,000 customers in WA and comprise over 14,500km in pipe length.

ATCO supports the proposed approach to:

- retain the licence exemption for the construction of gas distribution systems that is currently in place in the Gas Order
- amend the exemption within the Gas Order to provide additional oversight to property developers constructing gas distribution systems.

ATCO currently ensures all construction of the gas distribution system is undertaken under ATCO's gas distribution licence by competently trained personnel, contractors, or sub-contractors to according to ATCO's design requirements and subject to a quality assurance inspection. There has been limited use of the Exemption under the Gas Order and ATCO would anticipate that any future use would require adequate processes to enable ATCO to ensure that the gas distribution system was constructed to a compliant standard in line with legislative, policy and safety regulations.

The proposed amendment to the exemption within the Gas Order will provide ATCO, as the licensee, the powers to audit at any time. We consider this improves the processes of assurance and ensures the gas distribution assets are constructed to a standard and design that is fit for purpose, safe and compliant.

If you have any questions or would like to discuss any of the comments made in this submission, please contact myself or Kiran Ranbir, Manager Energy Policy, and Government Strategy. [REDACTED]

Yours sincerely

[REDACTED]

Russell Godsall
Executive General Manager-Gas Operations