

8 March 2019

Dr Kerry Schott AO
Independent Chair
Energy Security Board

(via e-mail to: info@esb.org.au)

Dear Dr Schott

RE: ENERGY SECURITY BOARD CONSULTATION PAPER, STRATEGIC ENERGY PLAN DRAFT METRICS, FEBRUARY 2019: APPEA COMMENTS

Since 1959, the Australian Petroleum Production & Exploration Association (APPEA) has been the peak national body representing the upstream oil and gas exploration and production industry. APPEA has around 60 member companies that explore for and produce Australia's oil and gas. In addition, APPEA's more than 140 associate member companies that provide a wide range of goods and services to the industry. Further information about APPEA can be found on our website, at www.appea.com.au.

APPEA welcomes the opportunity to provide comments on the proposed metrics to assess the outcomes and objectives of the Strategic Energy Plan (SEP), following the release of the Energy Security Board (ESB) Consultation Paper on 18 February 2019. APPEA's comments follow on from our 28 November 2018 submission and our e-mail comments provided to the ESB on 1 February 2019.

In addition to the APPEA submission, a number of APPEA members have made individual submissions to the Consultation Paper. This response should be read in conjunction with submissions from individual APPEA members.

APPEA's submission addresses specific aspects of the Consultation Paper, focussing on those areas that are particularly important for the upstream oil and gas industry.

As requested in the Consultation Paper, APPEA's comments are focused on the proposed evaluation metrics outlined in Attachment A to the Consultation Paper.

GENERAL COMMENTS

APPEA's comments on several areas of the Consultation Paper are set out in Attachment 1. As a general comment, while APPEA notes that while the Consultation Paper notes the SEP metrics are not to act as implicit goals or targets in and of themselves, but are intended to act as a transparent and independent set of measures by which progress can be measured, APPEA again recommends the SEP's objectives and metrics should not cut across, or conflict with, areas of policy making that lie outside or beyond the remit of the ESB or are already covered by other processes (and where the SEP does not have an appropriate role to play).

In particular, this means there remain a number of proposed objectives and metrics relating to emissions reductions targets and price setting/surveillance proposed in the Consultation Paper that need to be revised or removed.

SPECIFIC COMMENTS

As noted above, APPEA's comments on the metrics set out in Attachment A to the discussion paper can be found at [Attachment 1](#) to this letter. These take the form of 'comments' on relevant SEP metrics.

We would welcome the opportunity to discuss these comments with you. Please feel free to contact me on (02) 6267 0902 or at ddwyer@appea.com.au if you have any queries.

Yours sincerely



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