



REGULATION AND COMPLIANCE DIVISION

Level 7, 11 Waymouth Street,  
Adelaide SA 5000

GPO Box 618  
Adelaide SA 5001

Tel 08 8463 3000  
ABN 83 768 683 934  
[www.energymining.sa.gov](http://www.energymining.sa.gov)

24 March 2026

Troy Praag  
Group Head of Distribution Planning & Strategy  
AGIG  
Level 17, 181 William Street, Melbourne, VIC 3000

Cc: [TechCompliance@agig.com.au](mailto:TechCompliance@agig.com.au) , [RCANetworks@agig.com.au](mailto:RCANetworks@agig.com.au)

Dear Troy,

**LOW LEVEL OFFICIAL SURVEILLANCE – AGIG**

---

I refer to your letter dated 30 December 2025 and associated supporting information, requesting continuance of the APT O&M Services Pty Ltd (the Operator) Low Surveillance classification under Section 74 of the Energy Resources Act 2000 (the Act) following the transfer of ownership of the Operator to Australian Gas Infrastructure Group (AGIG) on 1 December 2025.

DEM have undertaken an assessment of AGIG's application and the provided supporting information, alongside AGIG's Process Safety and Environmental Management System (PSEMS) self-assessment provided 30 January 2026.

DEM notes particularly the continuance of the Operator's personnel, a controlled and phased transition of key management systems and the Operator's performance against the Regulation 16A of the Energy Resources Regulations 2013 including observations made by DEM through various and extensive surveillance activities since 29 July 2016.

On the basis of this assessment, pursuant to delegated powers under section 74(4) of the Act, I hereby continue the classification of AGIG as requiring low level official surveillance for design, construction, commissioning, operation, maintenance and decommissioning activities relating to transmission pipelines under licences (PL) 6 and 11 and Special Facilities License (SFL) 12 and 19 in South Australia.

Under this classification, please be aware of your activity notification obligations for the above regulated activities pursuant to Regulation 18 of the Regulations.



DEM is aware that the transition of key systems from APT O&M Services Pty Ltd (under the branding “APA”) to AGIG, is planned as a phased approach throughout the 18-month period commencing 1<sup>st</sup> December 2025. During this transition period, DEM will undertake continuing surveillance in line with its regulatory philosophy; focus areas and requested submissions relevant to this organisation change are outlined in Attachment 1.

In addition, please note that the outcome of DEM’s review of AGIG’s PSEMS self-assessment will follow in due course, with ongoing target areas for proactive regulatory surveillance.

Should you have any queries in relation to this matter, please feel free to contact myself or Joe Ward at [joseph.ward@sa.gov.au](mailto:joseph.ward@sa.gov.au) or on (08) 84292327.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Malavazos', enclosed within a large, hand-drawn oval.

**Michael Malavazos,  
Director – Energy Regulation  
Regulation and Compliance Division  
Department for Energy and Mining  
Sub Delegate of the Minister for Energy and Mining**

**Attachment 1 –**

The list below contains areas of focus for DEM's ongoing surveillance of the Riverland Pipeline (PL 6), Berri-Mildura Pipeline (PL 11), Virginia Gate Station (SFL 12) and the Gawler Gate Station (SFL 19) in the period of transition of the Operator from APT O&M Services Pty Ltd to AGIG.

DEM requests that AGIG provides relevant change management documentation to cover the following elements of the organisational transition, as and when they occur during the phased 18-month transition plan.

Please note this is not an exhaustive list.

1. Transition of key Operations and Maintenance management systems including, but not limited to computerised maintenance management, safety critical device management, incident database and engineering action tracking systems (e.g. Maximo, Vigilant)
2. Transition of Supervisory Control and Data Acquisition (SCADA) and Process Historian, for continuous monitoring of operations, to AGIG hardware.
3. Transition of Operation and Maintenance Procedures, including safety critical and emergency procedures.
4. Transition of Management of Change system
5. Transition of corporate and operational risk philosophy (risk matrices, risk assessment methodologies etc.)

The documents submitted should be those prepared for AGIG's internal management of this transition; it is not expected that AGIG prepares bespoke documentation for DEM.

In addition, DEM will seek general updates on the transition through standing Quarterly Compliance meetings with AGIG.