

# Gas Distribution and Retailing – Isolated and Embedded Networks Statement of Policy



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# 1 Purpose

The purpose of this Statement of Policy is to set out the Tasmanian Government's approach to the regulatory treatment of isolated and embedded gas distribution systems. This Statement of Policy has been finalised following consultation on the proposed changes to the existing regulatory arrangements.

This paper also provides an overview of the Tasmanian Government's existing policy position in relation to gas distribution. The gas industry has evolved since the initial 2003 policy paper<sup>1</sup> and it is expected to continue to change as the industry develops.

Please note that implementation of national energy market reforms as agreed in the Australian Energy Market Agreement by State, Territory and Federal governments may result in changes to the regulatory framework for natural gas in Tasmania after 1 January 2008. Please contact the Office of Energy Planning and Conservation on (03) 6233 2009 for further information.

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<sup>1</sup> Gas Distribution and Retailing Legislative, Regulatory and Policy Framework – Overview Paper. *Tasmanian Government, May 2003.*

## 2 Introduction

The development of a natural gas industry has the potential to be a key driver of Tasmania's future economic growth by offering commercial, industrial and residential consumers an alternative, competitively priced energy source.

The Government's key policy objectives are to:

- facilitate the development of an efficient and competitive natural gas industry in Tasmania;
- maximise the coverage of reticulated natural gas services throughout Tasmania in an economically efficient manner;
- minimise costs to gas consumers;
- enhance energy security for the State and consumers;
- establish appropriate standards of safety, reliability and quality in the natural gas supply industry; and
- establish a regulatory framework that maximises the long-term growth of the natural gas market in Tasmania, while providing sufficient regulatory certainty to attract investment and maintain the financial viability of the natural gas industry.

The introduction of natural gas provides Tasmania with a major new source of energy, modal competition and customer choice within the Tasmanian energy market, as well as potential for increased economic and employment growth.

This Statement of Policy follows the Gas Policy Paper<sup>2</sup> published in May 2003. There has emerged a need for Government to re-evaluate and re-state its positions in relation to gas policy details in response to the growth of the Tasmanian gas industry, particularly with the progressive roll-out of the natural gas distribution network since 2003. In response to market growth and future market development in energy, the Government will ensure its policy and commitments to industry continue to be reflected in the framework of Tasmanian legislation and regulation.

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<sup>2</sup> Gas Distribution and Retailing Legislative, Regulatory and Policy Framework – Overview Paper, Tasmanian Government May 2003.

## 3 Background

The Tasmanian gas market has fundamentally changed in the past ten years as a result of:

- the construction of the Tasmanian Natural Gas Pipeline, completed in 2003; and
- Powerco Ltd's construction of distribution pipelines since 2003.

There has also been growth in Tasmania's reticulated Liquefied Petroleum Gas (LPG) market alongside the roll-out of the natural gas distribution system. For this reason, in 2003 the Government included LPG within its definition of 'gas' in the *Gas Act 2000*. The consequence of this amendment is that owners, and operators of LPG distribution systems are required to meet a range of legislative requirements relating to licensing, safety and technical issues. The LPG and natural gas businesses therefore face similar regulatory requirements.

A number of issues have arisen, pursuant to the *Gas Act 2000*, which require clarification for industry participants. Specifically, concerns have been raised on issues relating to the classification and regulatory treatment of isolated gas distribution systems<sup>3</sup>, in particular those transporting LPG, and embedded gas distribution networks<sup>4</sup>. These issues have been addressed in this Statement of Policy.

This section of the paper sets out in greater detail the current status of the natural gas and LPG sectors in Tasmania.

### 3.1 Industry Development

The State of Tasmania and Powerco Ltd entered into a Development Agreement (DA) for investment in the backbone natural gas distribution networks. Since that time there have been further industry developments by way of a development agreement (DA-2A) with Powerco, which builds upon the initial DA in respect to the 'backbone' distribution network. The DA-2A between Powerco and the State Government underwrites the roll-out of the distribution network beyond the backbone network past some 38 500 residential and small business customers by April 2007.

It is also becoming apparent that LPG and other gases may provide a basis for further gas network development in areas remote from the natural gas system, and areas closer to the natural gas system but likely to remain isolated in the short to medium term.

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<sup>3</sup> An isolated gas distribution system (or network) is one not connected to a transmission pipeline or to a distribution system connected to a transmission pipeline. Typically it consists of a storage vessel, and pipe work extending to more than one customer, spread over more than one premises.

<sup>4</sup> Embedded gas distribution networks exist where multiple users are connected downstream of a primary metering point, for example commercial buildings, shopping centres, industrial estates and caravan parks.

## **3.2 Natural Gas**

Powerco's natural gas distribution systems connect to the Alinta owned gas transmission system. Powerco began work on its distribution systems in Tasmania in May 2003 with the commencement of the design process for natural gas systems. The first stage of the project (completed in July 2005) involved laying 100 km of gas pipe in the urban areas of Hobart, Launceston, Longford, Westbury, Bell Bay, Wynyard and Devonport.

Powerco is currently completing Stage 2 of its network rollout in Tasmania. Stage 2 is intended to make gas available to approximately 38,500 of the State's smaller commercial and residential customers.

Tasmania is the third state, behind NSW and Victoria, to have a fully contestable natural gas market. This means that there is full and open competition with other energy options including coal, electricity, liquid fuels, waste products, renewable energies and LPG.

Since 2003, the Director of Gas has issued two retail gas licences for entities to supply customer needs in Tasmania. They are:

- Option One Pty Ltd (license previously held by Powerco Energy Services Pty Ltd); and
- Aurora Energy Pty Ltd.

## **3.3 Liquid Petroleum Gas**

LPG is sold in Tasmania via reticulated supply at various sites and in cylinders. Both types of supply service the space heating, cooking and water heating markets for residential customers and commercial customers.

The three types of supply for LPG cylinders are importing, wholesale and retail. These are described below:

- Both Origin Energy and Kleenheat Gas import LPG into Tasmania;
- The wholesale cylinder market is dominated by Origin Energy and Kleenheat Gas; and
- Retail sales of LPG in cylinders for residential consumers are primarily conducted through LPG agents.

## 4 Legislative and Regulatory Framework

### 4.1 Policy Principles for Industry Development and Regulation

The underlying policy principles as outlined in May 2003<sup>5</sup> were:

- there is no regulation of distribution prices - the network operates as an 'uncovered' pipeline for the purposes of economic regulation;
- there is no retail price regulation for natural gas – retail prices are set in a competitive market where customers already have connection to and supply from the electricity system as well as choices of other competitive energy sources;
- the Government has established retail and distribution codes to facilitate industry co-ordination and outline its approach to customer protection standards, but customers may make such contractual arrangements as are most apt to their needs;
- the Energy Regulator (as the 'Director of Gas'<sup>6</sup>) has the power to develop industry arrangements through Codes or other guidance to ensure the efficient and effective development and operation of a competitive market - noting the strong preference of the government for 'light handed' regulation; and
- ensuring minimum standards of technical and safety regulation in the gas industry.

These principles have proven to be robust and appropriate to the development of the gas industry in Tasmania.

The approach outlined in this paper is consistent with the principles of light handed regulation and provides clarification of the regulatory framework since the last review of the gas industry and regulatory arrangements.

### 4.2 Current Regulatory Framework

Developing an appropriate legislative and regulatory framework is of critical importance to the viability of the gas industry. The framework needs to provide sufficient certainty to developers to enable them to undertake the significant capital investments required.

Service providers that own and operate gas transmission and distribution systems tend to be natural monopolies; therefore gas consumers need confidence that the regulatory environment will ensure efficient pricing. Gas consumers and the general public also need to be assured that the gas supply industry, including the pipelines, gas equipment and appliances, are designed, constructed, installed and operated in accordance with technical and safety requirements.

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<sup>5</sup> Gas Distribution and Retailing Legislative, Regulatory and Policy Framework – Overview Paper, Tasmanian Government May 2003.

<sup>6</sup> Appointed pursuant to the *Gas Act 2000*.

In the initial formation of gas policy and legislation, the Tasmanian Government recognised the potential for LPG and natural gas to coexist in a growing gas market, particularly in relation to the potential for retail companies to install compressed natural gas cylinders and reticulated LPG networks ahead of the construction of the natural gas distribution system. This allows gas companies to build up sufficient connections to enable profitable extension of the natural gas distribution system to new regions. In 2003 the Government included LPG within its definition of 'gas' in the *Gas Act 2000*. The *Gas Act 2000* applies to LPG only in relation to Parts 3 and 4 of the Act. These parts contain the legislative requirements relating to licensing, planning, safety and technical issues. Therefore, the LPG and natural gas network businesses face similar regulatory requirements in respect to licensing and safety.

The legislative and regulatory framework for the Tasmanian gas industry is outlined below:

- the *Gas Act 2000* provides for the regulation of distribution and retailing of natural gas in Tasmania and contestability arrangements (in June 2003, Parts 3 and 4 of the *Gas Act 2000* were applied to LPG networks to address concerns regarding LPG safety and technical issues);
- the *Gas Pipelines Act 2000* regulates the construction and operation of natural gas transmission pipelines and facilities in Tasmania;
- the *Gas (Safety) Regulations 2002* and the *Gas Pipelines Regulations 2002* provide greater detail in relation to the practical implementation of the *Gas Act 2000* and *Gas Pipelines Act 2000*;
- the *Gas Pipelines Access (Tasmania) Act 2000* regulates access to natural gas pipelines in Tasmania by adopting the Gas Pipelines Access Law including the National Third Party Access Code for Natural Gas Pipeline Systems (the Access Code), in accordance with Tasmania's commitments under the Natural Gas Pipelines Access Agreement;
- distribution licences set out the terms and conditions on which gas distributors may operate in Tasmania;
- retail licences set out the terms and conditions on which natural gas retailers may operate in Tasmania;
- the Gas Distribution Code regulates the standards for the use and operation of the distribution system and the minimum terms and conditions under which distributors may provide distribution services;
- the Gas Retail Code regulates the minimum terms and conditions under which retailers may sell gas to small retail customers in Tasmania; and
- the Gas Customer Transfer and Reconciliation Code sets out the obligations concerning the provision of information relating to delivery points to enable a customer to transfer to a different retailer, including:
  - the process by which a customer can be transferred to a different retailer;
  - the standards for meters and metering installations at customer delivery points; and

- the allocation and reconciliation of gas quantities between retailers at receipt points.

This package of legislation and regulations creates a regulatory framework designed to facilitate the development of the gas industry in Tasmania, while ensuring appropriate community and customer outcomes in terms of safety and consumer protection.

### **4.3 Role of LPG in Tasmanian Gas Industry**

The 2003 statement of gas industry development and regulatory principles<sup>7</sup> was made in the context of the announcement of the successful tender by Powerco to develop the natural gas distribution system. As has been noted, since that time it has become clearer that there is a role for LPG in developing the gas industry in Tasmania. For example, some LPG networks may be converted and incorporated into the natural gas distribution system (noting that there can be no interconnection or intermingling of these networks while they supply different gases).

To the customer LPG may appear similar to natural gas. However, the industry structure, production and supply chain is very different between these energy sources. LPG is typically supplied to a network from a pressure vessel. In this situation, the LPG network is isolated and there is no real opportunity for competitive sourcing of this gas from multiple sources of supply by competing retailers. Most notably, the scale of these networks is such that they cannot support the costs and regulatory complexity of competitive retailing.

It is noted that the Access Code is confined to natural gas. The underlying policy assumption is that issues of upstream and downstream competition and access do not arise in the context of LPG. This can be differentiated from customer protection issues. Any regulatory framework that is light handed and relies on market-driven outcomes needs a carefully constructed system of customer protection. In most instances, customers will be able to disconnect from the LPG network and seek competitive supply from bottled LPG or resort to electricity to which network customers are also connected. Accordingly there are strong incentives on an LPG network operator and retailer to act reasonably and provide LPG at competitive prices and high levels of service.

As LPG is defined as a gas for the purposes of Parts 3 and 4 of the *Gas Act 2000*, the Energy Regulator (as the 'Director of Gas') has the authority to impose licence conditions and if necessary develop retail and/or distribution codes applying to LPG network operators. The Minister for Energy has established the retail and distribution codes which provide for small customers in the natural gas sector. These codes are not directly transferable to the LPG sector, but the underlying customer protection standards and principles are seen as minimum standards to which LPG operators ought to have regard. Most importantly, all customers have the benefit of the consumer protections provided by fair-trading and trade practices legislation.

These policy issues relate specifically to the treatment of isolated and embedded gas distribution networks under the *Gas Act 2000*. The Tasmanian Government will be undertaking changes to the regulatory framework for embedded and isolated gas distribution systems to ensure regulatory certainty, and facilitate the continued development and investment in the Tasmanian gas industry. The Tasmanian

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<sup>7</sup> Gas Distribution and Retailing Legislative, Regulatory and Policy Framework – Overview Paper, Tasmanian Government May 2003.

Government also intends to clarify the application of the *Gas Act 2000* to ensure that consistent technical and safety requirements apply to gas networks and connected equipment.

## 5 Isolated Gas Networks

An isolated network (LPG and other gas) is one not connected to a transmission pipeline or to a distribution system connected to a transmission pipeline. Typically it consists of a storage vessel and pipe work extending to more than one customer, spread over more than one premises.

### 5.1 Current Regulatory Framework

As noted previously, in June 2003 the coverage of the *Gas Act 2000* was extended to include LPG networks through an amendment to the definition of 'gas' in the Act. The Act's application to LPG networks was restricted to Part 3 of the Act – regarding the licensing, construction and operation of distribution systems, and Part 4 of the Act – which imposes minimum technical and safety requirements for infrastructure, installations and appliances together with pipeline planning corridors.

This limited application of the *Gas Act 2000* was intended to confer certain rights and obligations upon developers of LPG networks, largely as a means of facilitating increased investment in the networks. With the growth of the Tasmanian gas regime, particularly reticulated isolated LPG networks constructed ahead of the natural gas network, a number of issues have arisen regarding the application of the current legislative and regulatory framework to LPG. Some provisions in the *Gas Act 2000* require clarification to make the application of the Act certain.

Under the *Gas Act 2000*, isolated networks are currently defined as a distribution system, giving rise to the need for a Distribution Licence and a Retail Licence. One of the conditions of compliance with the Distribution and Retail Licences is compliance with the Gas Distribution and Gas Retail Codes. These are expansive in their requirements, all of which are directly applicable to natural gas but not necessarily to LPG or other gases, with the possible consequence of imposing inappropriate regulatory arrangements on isolated distribution system operators.

In much the same way, many of the legislative responsibilities that relate to natural gas distribution systems are not relevant to isolated networks. Retail contestability (i.e. choice between retailers) is not a practical outcome for isolated networks because of the small scale of operation, a lack of ability to source gas competitively within the one network, and the inherent contestability of customer connections from other non-network gas suppliers.

It has become apparent that the limited application of the *Gas Act 2000* to LPG networks could also potentially result in unintended consequences. Specifically, subjecting LPG networks to only Parts 3 and 4 of the *Gas Act 2000* has resulted in some uncertainty regarding technical and safety matters. In particular, the ability of designated parties to exercise enforcement powers under the Act is unclear. These powers are largely addressed under Parts 5 and 6 of the Act.

## 5.2 Statement of Policy in Relation to Isolated Gas Networks

This Statement of Policy will initiate the following changes to the regulatory framework for isolated networks:

- Isolated networks of LPG and other gas will continue to be subject to Parts 3 and 4 of the *Gas Act 2000* and are therefore required to obtain appropriate licences.
- Regulations will be developed under the *Gas Act 2000*, creating a class of licence for isolated LPG and other gas distribution systems.
- It is proposed these regulations will prescribe specific licence conditions to that class of licence to provide for billing, customer disputes and metering. For example, those sections of the Gas Distribution and Gas Retail Codes considered appropriate for isolated LPG and other gas networks may be applied through the licence conditions.
- A condition may also be imposed which specifies compliance with the relevant gas industry standards relating to the future connection of new isolated networks to the natural gas distribution network.
- The current Gas Distribution and Gas Retail Codes are to apply to natural gas networks only. The Director of Gas will retain the general code making power which would allow for intervention in matters with respect to customer interests if required, e.g. billing, metering, connection and disconnection rules in isolated networks.
- The general policy of full retail contestability for gas, with supporting codes and market arrangements, does not apply to isolated networks.
- In order to maintain effective safety and technical regulation in LPG networks, the definition of 'gas' in the *Gas Act 2000* will be amended to ensure that LPG is subject to all parts of the Act. Specifically, Part 5 - miscellaneous provisions relating to appointment of gas officers and their powers in respect to access to gas infrastructure and gas installations for the purpose of investigative, operational or emergency work, and Part 6 - enforcement powers of authorised officers relating to investigation, safe operation and collection of information.

## 6 Embedded Gas Networks

Embedded gas networks exist where multiple users are connected downstream of a primary metering point, for example commercial buildings, shopping centres, industrial estates and caravan parks.

### 6.1 Current Regulatory Framework

The *Gas Act 2000* was intended to apply to the natural gas distribution systems only. As a result embedded network owners/operators have experienced some uncertainty in the application of regulatory responsibilities under the *Gas Act 2000* to embedded networks.

Embedded gas networks are not specifically defined in the *Gas Act 2000* and may be considered as a distribution system under the current definition.

A gas entity operating a distribution system must obtain a distribution licence and comply with the regulatory obligations imposed by such a licence and relevant legislation. This includes the obligation of delivering full retail contestability (FRC) to all the embedded network's customers or end-users. The small scale of embedded networks means that the costs of providing the infrastructure and regulatory arrangements to support FRC to end-users are likely to outweigh the benefits.

### 6.2 Statement of Policy in Relation to Embedded Gas Networks

The organisation, scale and underlying economics of embedded network investments differ significantly from the natural gas distribution network. As a result of these differences it is not considered desirable or practical for the owners or operators of these networks to be subject to the same regulatory obligations that apply to the natural gas distribution network. It is considered that onerous regulatory requirements in the laws may impede industry investment and development, and thereby deny customers the benefit of access to natural gas. Therefore, this Statement of Policy will initiate the following changes to the regulatory framework for embedded networks:

- The owners/operators of embedded networks should not have to comply with these regulatory obligations, other than the safety and technical regulations. This means owner/operators of embedded networks - given the underlying economics, organisation and scale of their investments - will not be required to extend FRC to those customers supplied from their embedded networks.
- All customers supplied directly from the distribution system will have the benefit of FRC but the further extensions into commercial properties will be the subject of case-by-case negotiations, with a property owner having the option of entering an agreement for extension of the distribution system into the property.
- Regulations will be made under the *Gas Act 2000* exempting embedded gas distribution systems from the requirement to obtain a licence. This will be achieved by defining the network boundaries for the class of installation deemed appropriate to be exempted from licensing. The relevant network should be wholly contained within the premises or property owned or controlled by the owner/operator of the embedded network (whilst noting that the

distribution network terminates at the actual gas supply point). The proposed approach may be supported by a network boundary code.

To promote greater clarity with respect to the proposed approach, the regulatory instrument will define the gas distribution network boundary and will provide for a default terminating point for the distribution network at a property boundary. The regulatory arrangements will recognise that the distribution system operator (or another such operator) may extend the network into the property by agreement with the property owner.

Confining the definition of the gas distribution system by defining the gas distribution network boundary at the primary connection point to the gas distribution system eliminates the need for embedded network owners/operators to obtain a licence. The customer is now defined at the primary connection point where they take supply from the distribution system. Therefore, the gas installation owner becomes the 'customer' exposed to FRC and can negotiate with retailers and on-supply to end-users. This means that embedded network end-users downstream from the primary connection point are no longer captured by the customer definition.

This is a 'light-handed' regulatory approach consistent with the notion that the developing gas market is a competitive energy source seeking entry to an established market. The objective is to develop the energy market and provide a range of competing energy sources to the widest possible number of potential customers.

The regulatory arrangements for the developing gas market should be flexible. For example, some end-users may require large quantities of gas that may be more appropriately supplied directly via a dedicated supply point or extension from the gas distribution network. Examples include a large gas customer located within a shopping complex or an industrial estate. This flexibility will be provided in the regulations by permitting an agreed alternative gas network boundary, or by permitting the gas distributor's assets within the customer's residential property to be defined as part of the distribution network. This will allow end-users to bypass an embedded network and connect their individual gas installation directly to the gas distribution network and secure the benefits of FRC.

## 7 Conclusion

The underlying legislative and policy objective of the Tasmanian Government's regulatory framework for gas is to balance the cost of regulation against industry development and customer benefit in a competitive environment. The purpose of this Statement of Policy is to clarify the application of the legislative and regulatory framework in response to industry developments since the last substantive amendments to the *Gas Act 2000* and the Government's policy statement of May 2003. The proposed approaches are consistent with the Government's stated policy of light handed regulation of the gas industry, involving minimal Government intervention and a reliance on market driven outcomes.

It is intended that this Statement of Policy will support the continued development of, and investment in, the reticulated gas industry in Tasmania to the benefit of customers, economic activity and employment. This Statement of Policy gives guidance to the industry, including potential new entrants, investors, customers, and the Energy Regulator in the capacity of 'Director of Gas' as to the proposed intentions and objectives of Government.

# Attachment 1

## Gas Safety and Technical Standards

The gas transmission industry is licensed and regulated pursuant to the *Gas Pipelines Act 2000* and *Gas Pipelines Regulations 2002*. The *Gas Pipelines Act 2000* provides a process for the control of construction standards for new transmission pipelines, transmission off take facilities and ancillary equipment. A licensee of a transmission pipeline must submit a safety and operating plan that demonstrates compliance with the standards and codes prescribed by the regulations to the Director of Gas Safety. This plan must ensure the safe operation of a pipeline and the safe conveyance, supply, measurement or control of gas, or other regulated substance. The plan also outlines planning and response mechanisms required for the control of high-pressure gas pipeline emergencies.

The distribution of natural gas is licensed and regulated in accordance with the *Gas Act 2000* and *Gas (Safety) Regulations 2002*. The approval and operation of LPG distribution facilities is provided for under Parts 3 & 4 of the *Gas Act 2000*.

The *Gas Act 2000* provides a safety and technical framework for the construction and operation of distribution pipelines, associated pipe work, gas appliances and gas installations. Together the *Gas (Safety) Regulations 2002* and the *Gas Act 2000* specify gas standards and approvals by the Director of Gas Safety to ensure the system of pipes, appliances and installations supplying natural gas are operated and maintained in a safe manner including:

- independent design certification and approval;
- construction, testing and commissioning in accordance with relevant national standards; and
- regular operational auditing and independent systems certification of the approved safety and operating plan.

Prior to commissioning and connection to the gas distribution network, gas appliances and gas installations are subject to the following:

- all design submissions from gasfitters for commercial consumers in relation to complex and prescribed standard gas installations and type B gas appliances must be accepted by the Director of Gas;
- construction testing and commissioning must be in accordance with relevant national standards, with a high ratio of site verification by regulatory staff; and
- final acceptance, installation certification and notification standards.

The development of safety and operating plans for the retail gas entities operating in natural gas industry is ongoing, forming part of the gas entities' licensing conditions and approved by the Director of Gas Safety.

The Tasmanian Gas Supply Emergency Coordination Plan has recently been adopted by relevant parties to ensure management of gas curtailment or quality issues.

LPG gas installations are also required to comply with this approval regime for installations and appliances, in that:

- standard gas installations with type A gas appliances are subject to self certification and notification requirements to the Director of Gas Safety, the gas entity and the consumer; and
- self certified standard gas installations are subject to regulatory standards audits.

This framework of standard setting for gas installations enables qualified gas fitters to self-certify the majority of gas installations and approved appliances for small retail consumers.

The Director of Gas Safety has the authority under the *Gas Act 2000* to approve the conversion of approved gas appliances from LPG to natural gas. This includes a gas appliance; components and fittings, recall and safety alert mechanism similar to other gas technical regulators.

Gasfitter licensing for LPG gas installations is controlled through the Plumbers and Gas Fitters Registration Board. The introduction of natural gas has required the implementation of a certification scheme through the issuing of certificates of competency by the Director of Industry Safety pursuant to the *Workplace Health & Safety Act 1995*. This scheme is supported by TAFE training schemes for skills upgrade to natural gas, which allows gas fitters to undertake work on gas installations and type A appliances. Additional training is available through the TAFE for Type B gas fitting that requires completion of gas and electrical training and successful completion of an examination identical to that of the Plumbing Industry Commission of Victoria.

In 2008 the Administrator of Occupational Licensing will introduce a coordinated scheme for gas fitter licensing pursuant to the *Occupational Licensing Act 2005*. This legislation will coordinate all training, licensing, certification and notification requirements with the requirements of the *Gas Act 2000* for both natural gas and LPG.

The Director of Gas Safety maintains communications to the gas industry through a specialised gas standards and safety web site which provides access to common use forms, technical standards and general gas safety information. The web address is <http://www.wst.tas.gov.au/gssPublish/node/gss.htm>.



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