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12 January 2015

Tyson Self
Assistant Director
Gas Access
Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

By email: publicsubmissions@erawa.com.au

Dear Tyson

RE: DRAFT DECISION ON THE PROPOSED REVISED ACCESS ARRANGEMENT PROVISIONS FOR THE MID-WEST AND SOUTH-WEST GAS DISTRIBUTION SYSTEMS

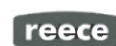
On behalf of the Executive Committee of the Master Plumbers and Gasfitters Association of WA (MPGA), thank you for the opportunity to comment on the proposed revised access arrangement provisions for the mid-west and south-west gas distribution systems.

The MPGA represents approximately 600 plumbing and gasfitting businesses throughout Western Australia and our training arm, MPA Skills trains over 60% of WA's plumbing and gasfitting apprentices, and currently employs 250 students.

Upon review of the Draft Decision and ATCO Gas Australia's proposed revisions, the MPGA has a number of concerns regarding the proposed reduction in infrastructure investment to support development areas to only 10,000 new connections over a 5 year period. This reduction to one tenth of ATCO's forecast of new customers seeking a natural gas connection is not effective in promoting the sustained use of natural gas in WA.

It may also lead to a reduction in employment opportunities for licenced gasfitters, which in turn may have a follow on effect to apprenticeship enrolments in the immediate and longer terms.

Safety concerns are also prevalent in relation to the operation of the gas network if lower expenditure levels as outlined in the Draft Decision are implemented. As the industry body, the MPGA has an obligation to minimise the risk to the health and safety of consumers, and licensed plumbers and gasfitters.



The MPGA believes that it is the responsibility of service providers such as ATCO to assist in the development of a sustainable energy market for consumers with competition and choice. If the costs for consumers who do not have a gas main in their street rise to have access to natural gas, many of them may be forced to use other energy sources.

In summary, the MPGA supports ATCO's proposed revisions to the Draft Decision to ensure that natural gas is accessible to consumers throughout WA as a sustainable energy source that creates value in investing in the state's energy infrastructure, and to ensure the safety of consumers and licensed tradespersons.

Should you wish to discuss this matter further, please do not hesitate to contact me.

Yours sincerely

Murray Thomas
Chief Executive Officer