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31 December 2014

Professor Stephen King Alternate Chairman Economic Regulation Authority Level 4, Albert Facey House Wellington Street PERTH WA 6000

**Dear Stephen** 

## DBNGP ACCESS ARRANGEMENT ACCESS ARRANGEMENT REVISION PROPOSAL

## **Revision Proposal Documentation**

In accordance with Section 132 of the *National Gas Access (WA) Act 2009* (NGA) and Rule 52(1) of the National Gas Rules (version 23) (NGR), please find enclosed the following documentation filed by DBNGP (WA) Transmission Pty Ltd (**Operator**) as a complying service provider under clause 10(2) of the NGA:

- Proposed Revised Access Arrangement
- Proposed Revised Access Arrangement Information

These documents are attached to the enclosed Submission #1. For the purposes of the NGR, these documents comprise the Access Arrangement Revision Proposal (as that term is defined in the NGR).

In accordance with NGR 52(2), Submission #1 contains marked up and clean versions of both documents that make up the Access Arrangement Revision Proposal. Therefore, these documents:

- set out the amendments to the access arrangement that DBP proposes for the access arrangement period due to commence on 1 January 2016; and
- incorporate the text of the access arrangement in the revised form.

## Supporting Submissions

In addition to the Access Arrangement Revision Proposal, DBP also submits hard copies of the following supporting submissions that substantiate various aspects of the Access Arrangement Revision Proposal:

- Submission #2: Cost controls and governance
- Submission #3: Proposed reference service
- Submission #4: Terms and conditions
- Submission #5: Non-tariff related issues
- Submission #6: Cost verification and allocation
- Submission #7: Actual capital expenditure (expansion)
- Submission #8 Actual capital expenditure (stay-in-business) (Parts 1 & 2)
- Submission #9: Forecast capital expenditure
- Submission #10: Forecast operating expenditure
- Submission #11: Capacity and throughput forecast
- Submission #12: Rate of return
- Submission #13: Total revenue



Submission #14: Tariff model and tariff calculation

Also enclosed (as part of Submission #14), are confidential and public versions the tariff model used to show the basis for calculating the Total Revenue and each of the Reference Tariffs. Hard copies of both versions of the model have not been enclosed with the hard copy of submission 14. Only electronic copies of both versions of the model have been enclosed.

Submissions 1 to 14 are also provided electronically in the enclosed thumb drive.

## **Confidential Information**

This electronic record also contains:

- versions of each of the following submissions (confidential submissions) which highlight, in yellow, the information which DBP claims should be maintained as confidential ('HIGHLINE' versions):
  - a. Submission #2;
  - b. Submission #4;
  - c. Submission #6;
  - d. Submission #7;
  - e. Submission #8;
  - f. Submission #9;
  - g. Submission #10;
  - h. Submission #11; and
  - i. Submission #14;
- versions of each of the submissions that redact or remove the confidential information highlighted in the HIGHLINE versions, in the manner provided for in section 327 of the National Gas Law (NGL) ('Public' versions); and
- 3. versions of the confidential submissions without the confidential information being highlighted (confidential versions).

Consistent with section 3.5 of the ERA's own Gas Access Arrangement Guidelines of March 2014, DBP's substantiation of its claims of confidentiality has been made in an Appendix to each confidential and HIGHLINE version of each confidential submission.

For the purposes of section 327 of the NGL:

- the HIGHLINE versions of confidential submissions 2, 4, 6-11 and 14 together with the confidential versions of these submissions are provided to the ERA in confidence; and
- DBP does not object to the following enclosed documents being made available via the ERA's website:
  - Proposed Revised Access Arrangement;
  - Proposed Revised Access Arrangement Information;
  - Public version of the tariff model;
  - Public versions of submissions 2, 4, 6, 7, 8, 9, 10, 11 & 14; and
  - The enclosed versions of submissions 1, 3, 5, 12 & 13.

DBP looks forward to working with your team in achieving a revised access arrangement that can be approved in a timely manner.

Yours sincerely

ANTHONY CRIBB General Manager Corporate Services Company Secretary