

Proposed Revisions DBNGP Access Arrangement

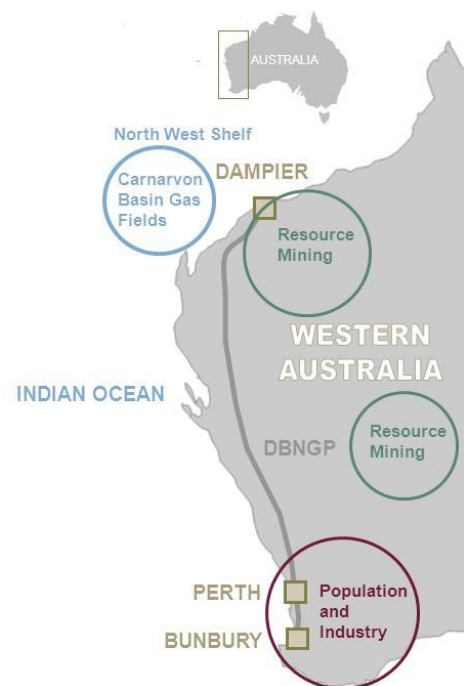
*2016 – 2020 Regulatory Period
Supporting Submission: 50*



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DBP Transmission (DBP) is the owner and operator of the Dampier to Bunbury Natural Gas Pipeline (DBNGP), Western Australia's most important piece of energy infrastructure.

The DBNGP is WA's key gas transmission pipeline stretching almost 1600 kilometres and linking the gas fields located in the Carnarvon Basin off the Pilbara coast with population centres and industry in the south-west of the State



Trent Leach

Manager Regulatory & Government Policy
P: (08) 9223 4357
M: 0429 045 320

Nick Wills-Johnson

Manager Economic Regulation
P: (08) 9223 4902
M: 0477 374 246

DBNGP (WA) Transmission Pty Limited

ABN 69 081 609 190
Level 6
12-14 The Esplanade
PERTH WA 6000
P: +61 8 9223 4300
F: +61 8 9223 4301

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1. INTRODUCTION

- 1.1 On 22 December 2015, the Economic Regulation Authority (**ERA**) made its draft decision (Draft Decision) in relation to the full access arrangement proposal filed by DBNGP (WA) Transmission Pty Ltd (**DBP**) on 31 December 2014 (**Original AA Proposal**).
- 1.2 The Draft Decision indicates that the ERA:
 - (a) is not prepared to approve the Original AA Proposal; and
 - (b) requires 74 amendments to the Original AA Proposal in order to make the access arrangement proposal acceptable to the ERA.
- 1.3 The Draft Decision also fixes a period for amendment of and/or addition to the Original AA Proposal (**revision period**), which revision period expires on 22 February 2016.
- 1.4 Pursuant to Rule 60 of the NGR, DBP may, within the revision period, submit additions or other amendments to the Original AA Proposal to address matters raised in the Draft Decision but the amendments must be limited to those necessary to address matters raised in the access arrangement Draft Decision, unless the ERA approves further amendments.
- 1.5 Having reviewed the Draft Decision, DBP has made additions and other amendments to the following documents that made up the Original AA Proposal:
 - (a) Access Arrangement; and
 - (b) Access Arrangement Information.
- 1.6 For the purposes of this submission, these amended documents, together, are called the **Amended AA Proposal**.
- 1.7 The following documents are attached to this submission:
 - (a) Clean version of the Amended Proposed Revised Access Arrangement (**Amended Proposed Revised AA**) (Appendix A)
 - (b) Clean version of the Amended Proposed Revised Access Arrangement Information (**Amended Proposed Revised AAI**) (Appendix B)
 - (c) Marked up version of the Amended Proposed Revised Access Arrangement showing the changes made compared with the Original Proposed Revised AA (Appendix C)
 - (d) Marked up version of the Amended Proposed Revised Access Arrangement Information showing the changes made compared with the Original Proposed Revised AAI (Appendix D)
 - (e) Marked up version of the Amended Proposed Revised Access Arrangement showing the changes made compared with the current access arrangement for AA3 (Appendix E);
 - (f) Marked up version of the Amended Proposed Revised Access Arrangement Information showing the changes made compared with the current access arrangement information (Appendix F); and
 - (g) Amended reference tariff model Appendix G).
- 1.8 The documents attached at Appendices A & B comprise the Amended AA Proposal DBP submitted pursuant to Rule 60 of the NGR.
- 1.9 The Amended AA Proposal contains additions and amendments to the Original AA Proposal that can be grouped into one of the following categories:
 - (a) Amendments or additions that incorporate an amendment from the Draft Decision;
 - (b) Amendments or additions necessary to address a matter raised in the Draft Decision (**Matter Amendments**); and

- (c) Amendments or additions that are not of the kind referenced in paragraphs 1.9(a) or 1.9(b) and for which DBP seeks the ERA's approval to make (**Approval Amendments**).

1.10 This submission is therefore structured as follows:

- (a) Section 2 contains the content requirements for the access arrangement and access arrangement information and DBP's assessment of compliance with those requirements.
- (b) Section 3 contains a table showing the following information for each amendment from the Draft Decision:
 - (i) Whether or not DBP has accepted the Draft Decision Amendment
 - (ii) The relevant submissions DBP has made in support of its decision to not accept a Draft Decision Amendment
- (c) Section 3 contains another table showing the following information for each amendment or addition to the Original AA Proposal that is not directly addressing a Draft Decision Amendment:
 - (i) Whether the amendment or addition is either of the type listed in paragraph 1.9(b) or 1.9(c).
 - (ii) Where relevant, each matter raised in the Draft Decision to which each amendment or addition relates.
 - (iii) What supporting submissions have been made for it being made in the Amended AA Proposal. It should be noted that these submissions should be relied on by the ERA in support of the approval DBP is required to obtain from the ERA pursuant to Rule 60(2) of the NGR for any relevant amendment or addition.
- (d) Section 4 relates to the impact of the merits review applications currently being considered by the Australian Competition Tribunal and their impact on the remaining timetable for the ERA's assessment of the Amended AA Proposal.

1.11 Rule 59(5)(c)(iii) of the NGR requires the ERA to allow at least 20 business days from the end of the revision period for submissions to be made (in relation to both the Draft Decision and the Amended AA Proposal). The ERA has advised that interested parties are able to make submissions on the ERA's Draft Decision up until 4:00pm (WST) 22 March 2016.

1.12 While DBP is of the view that the Amended AA Proposal contains the information that the NGA (which includes the WA National Gas Access Law text (NGL) and the National Gas Rules (**NGR**)) requires to be included in order to enable it to be approved by the ERA, DBP will also be filing the following supporting submissions that explain and substantiate the amendments and additions in the Amended AA Proposal that have been made to address various matters raised in the Draft Decision:

- (a) Submission 50: Revised AA Proposal (being this submission);
- (b) Submission 51: Response to Pipeline Services Amendments;
- (c) Submission 52: Response to Terms and Conditions Amendments;
- (d) Submission 53: Response to Opening Capital Base Amendments;
- (e) Submission 54: Response to Projected Capital Base Amendments;
- (f) Submission 55: Response to Forecast Operating Expenditure Amendments;
- (g) Submission 56: Response to Rate of Return Amendments;
- (h) Submission 57: Response to Other Tariff Related Amendments; and
- (i) Submission 58: Response to Non-Tariff Related Amendments.

2. ACCESS ARRANGEMENT & ACCESS ARRANGEMENT CONTENT REQUIREMENTS

Access Arrangement Content

- 2.1 The following Table 1 outlines the relevant provisions of the NGR that specify what must be included in a Proposed Revised AA and where these are dealt with by DBP in the Amended Proposed Revised AA.
- 2.2 To the extent that the NGR specifies what a service provider may include in an access arrangement revision proposal (**voluntary content provision**), the table below also lists these provisions of the NGR and outlines where DBP has dealt with each of them in the Amended Proposed Revised AA. To the extent that DBP has elected not to deal with the voluntary content provision in the Amended Proposed Revised AA, DBP has indicated "N/A" in the table.

Table 1: Access Arrangement requirements

NGR Reference	NGR Requirement	AA Section
48(1)(a)	Identify the pipeline to which the access arrangement relates and include a reference to a website at which a description of the pipeline can be inspected	2 & Att1
48(1)(b)	Describe the pipeline services the service provider proposes to offer to provide by means of the pipeline	3
48(1)(c)	Specify the reference services	3.1 to 3.5
48(1)(d)(i)	The reference tariff	3.3(c)(iii) 3.4(c)(iii) 3.5(c)(iii)
48(1)(d)(ii)	The other terms and conditions on which the reference service will be provided.	4 & Attachment 1
48(1)(e)	Queuing requirements	5
48(1)(f)	Capacity trading requirements	6 & Attachment 1
48(1)(g)	Extension and expansion requirements	7
48(1)(h)	Terms and conditions for changing receipt and delivery points	8
48(1)(i)	The review submission date and the revision commencement date	14
48(1)(j)	State the expiry date (If there is to be an expiry date)	N/A
49(1)	Review Submission and Revision Commencement Dates	14.2 & 14.3
50	Duration of access arrangement	14
51	Trigger events to accelerate a review submission date	N/A
82	Capital contributions included in the capital base	12
84	Speculative Capital expenditure account	10
85	Capital redundancy mechanism	N/A
85(3)	Cost sharing mechanism for decline in demand	N/A
90	Provisions governing the calculation of depreciation	9
92(1) & 97(1)	Reference tariff variation mechanism	11
98	Incentive mechanism	N/A
99	Fixed principles	13
101	Reference services and other pipeline services	3
102	Variable operation of access arrangement	N/A
103	Queuing requirements	5
104	Extension and expansion requirements	7
105	Capacity Trading Requirements	6
106	Change of receipt or delivery point by user	8

Access Arrangement Information Content

- 2.3 Section 1 of the Amended Proposed Revised AAI contains a table that outlines the relevant provisions of the NGR which specify what matters must and may be included in a Proposed Revised AAI and where each matter is dealt with by DBP in the Amended Proposed Revised AAI. The table has been updated to address amendments and additions that have been made by DBP in relation to matters addressed by the Draft Decision.
- 2.4 As was the case with the Original AA Proposal, DBP considers that a strict compliance with the provisions of the NGR outlined in Table 2 would require DBP to include in the Amended Proposed Revised AAI information which is sensitive information in that it would cause undue harm to the legitimate business interests of DBP and/or users and prospective users. Accordingly, DBP proposes that the sensitive information be aggregated or redacted so as to avoid disclosure of the elements that make it sensitive. Table 2 also contains details of where the sensitive information is dealt with in the AAI, why it would be sensitive if it was made publicly available and how it has been dealt with to remove the sensitivity.

Table 2: Sensitive information

Relevant NGR	Where dealt with in AAI	How sensitive information is dealt with	Reason for aggregating the sensitive information
	Section 2	Redaction	Disclosure is market sensitive and would inhibit DBP from achieving efficient costs.
71(1)(a)(iii)(A)	Section 5	Outlet Point information as to number of shippers is aggregated	<p>Would disclose information regarding individual shipper's contracted capacity and/or throughput – because some outlet points only have one shipper with contracted capacity</p> <p>Information has been aggregated in a way to enable shippers to understand how the reference tariff is structured.</p> <p>Given the proposed tariff structure, no shipper or prospective shipper should be adversely affected by the information being aggregated.</p>
71(1)(a)(iii)(B)	Section 5	Outlet Point information as to maximum, average and minimum throughput is aggregated	<p>Would disclose information regarding individual shipper's contracted capacity and/or throughput – because some outlet points only have one shipper with contracted capacity</p> <p>It is aggregated in a way to enable shippers to understand how the reference tariff is structured.</p> <p>Given the proposed tariff structure, no shipper or prospective shipper should be adversely affected by the information being aggregated.</p>

- 2.5 Pursuant to NGR 43(2), DBP requests the ERA's approval to the Amended Proposed Revised AAI being submitted in this form to address the effects of disclosing the above sensitive information.
- 2.6 It should also be noted that DBP has taken the following approach to the rounding of values in each of the tables included in the Amended Proposed Revised AAI. Each value has been rounded to the nearest second decimal place from the corresponding value calculated from the tariff model (which is not rounded). This includes the totals in each table. Because the totals in each table are separately rounded from the complete value for each total in the tariff model instead of adding up the rounded values used in each table, some totals in tables do not add up to equal the total of the rounded values in a table. However, the unrounded totals in the tariff model do equal the sum of the unrounded values.

3. AMENDMENTS OR ADDITIONS IN RESPONSE TO DRAFT DECISION

3.1 The following two tables have been prepared to assist the ERA with the understanding how DBP has dealt with each Draft Decision Amendment and all amendments and additions that DBP has included in the Amended AA Proposal:

- (a) Table 3 outlines, for each Draft Decision Amendment:
 - (i) how DBP has responded to the Draft Decision Amendment; and
 - (ii) where DBP has not accepted the Draft Decision Amendment - in which supporting submission DBP has outlined its reasons; and
- (b) Table 4 outlines additional amendments or additions included in the Amended AA Proposal that are not directly accepting a Draft Decision Amendment and in respect of each such amendment or addition:
 - (i) each matter raised in the Draft Decision it that the amendment or addition relates to;
 - (ii) what supporting submissions have been made for it being made in the Amended AA Proposal. It should be noted that these submissions should be relied on by the ERA in support of the approval DBP is required to obtain from the ERA pursuant to Rule 60(2) of the NGR.

Table 3: Response to Draft Decision Amendments

Amendment #	DBP Response to Amendment	DBP Responsive submission ref.
1.	Accepted	
2.	Rejected	Sub 57 section 10
3.	Full Haul Service Definition – Rejected MLV31 description - Accepted	Sub. 51 section 2
4.	Rejected	Sub. 51 section 3
5.	Rejected	AAI – total revenue calculation
6.	Accepted	Sub. 53 Sub 56 AAI section 2
7.	Information provided where possible	Sub 57 section 2 & Appendix A. AAI section 10
8.	Accepted	Sub 58 section 2 AAI section 10
9.	Rejected	Sub 55 AAI section 11
10.	Reasoning in relation to Stay In Business capital expenditure – Rejected Methodology used by ERA for the other factors used to calculate the opening capital base as at 1 January 2016 - Accepted	Sub. 53 AAI section 6
11.	Rejected	Sub 54 AAI section 7 & 8
12.	Rejected	Sub 54 AAI section 7
13.	Accept the methodology but reject the values as a consequence of response to required amendments #10-#12	Sub 54 AAI section 7&9
14.	Return on Debt - largely Accepted Return on Equity – Rejected	Sub 56 AAI section 13
15.	Rejected	Sub 56 AAI section 13
16.	Rejected	Sub 57 para 3

Amendment #	DBP Response to Amendment	DBP Responsive submission ref.
		AAI section 14
17.	Further information has been provided and consultation requested	Sub 57 section 4
18.	Accepted	Sub 57 section 5 AAI section 15
19.	Rejected	Sub 57 section 6 AAI section 16 AA section 11
20.	Rejected	Sub 57 section 7 AAI section 16 AA section 11
21.	Rejected	Sub 57 section 7 AAI section 16 AA section 11
22.	Rejected	Sub 57 section 7 AAI section 16 AA section 11
23.	Rejected	Sub 57 section 8 AAI section 16 AA section 11
24.	Rejected	Sub 57 section 9 Also refer to Sub 50.
25.	Rejected	Sub 56
26.	Accepted	
27.	Accepted	Sub 52 para 23.3 & 2.4
28.	Rejected	Sub 52 para 2.5-2.13
29.	Accepted	Sub 52 para 2.14 & 2.15
30.	Accepted	Sub 52 para 2.16 & 2.17
31.	Accepted.	Sub 52 para 2.18 & 2.19
32.	Rejected	Sub 51 para 2.20 & 2.21
33.	Accepted	Sub 52 para 2.22 & 2.23
34.	Accepted	Sub 52 para 2.24 & 2.25
35.	Largely accepted however some alternative wording proposed.	Sub 52 para 2.26 – 2.31
36.	Rejected	Sub 52 para 2.32 – 2.37
37.	Rejected	Sub 52 para 2.38-2.45
38.	Rejected	Sub 52 para 2.46 – 2. 49
39.	Accepted	Sub 52 para 2.50-2.53
40.	Accepted	Sub 52 para 2.54 & 2.55
41.	Accepted	Sub 52 para 2.56 & 2.57
42.	Accepted	Sub 52 para 2.58 & 2.59
43.	Accepted	Sub 52 para 2.60 & 2.61
44.	Rejected	Sub 52 para 2.62 – 2.67
45.	Accepted	Sub 52 para 2.68 & 2.69
46.	Rejected	Sub 52 para 2.70 – 2.74
47.	Accepted	Sub 52 para 2.75 & 2.76
48.	Rejected	Sub 52 para 2.77-2.96
49.	Rejected	Sub 52 para 2.97-2.100
50.	Rejected	Sub 52 para 2.101-2.108
51.	Accepted	Sub 52 para 2.109 & 2.110
52.	Rejected	Sub 52 para 2.111-2.114
53.	Rejected	Sub 52 para 2.115 – 2.119
54.	Rejected	Sub 52 para 2.120 – 2.132
55.	Rejected	Sub 52 para 2.133 – 2.141

Amendment #	DBP Response to Amendment	DBP Responsive submission ref.
56.	Accepted	Sub 52 para 2.142 & 2.143
57.	Rejected	Sub 52 para 2.144 – 2.148
58.	Accepted	Sub 52 para 2.149 & 2.150
59.	Accepted	Sub 52 para 2.151 & 2.152
60.	Rejected	Sub 52 para 2.153-2.163
61.	Accepted	Sub 52 para 2.164 & 2.165
62.	Accepted	Sub 52 para 2.166 & 2.167
63.	Rejected	Sub 52 para 2.168-2.175
64.	Rejected	Sub 52 para 2.176-2.193
65.	Rejected	Sub 52 para 2.176-2.193
66.	Accepted	
67.	Rejected	Sub 58 section 3
68.	Accepted	
69.	Accepted	Sub 52 para -2.194 – 2.196
70.	Rejected	Sub 58 section 4
71.	Accepted	Sub 58 section 4
72.	Accepted	Sub 58 section 4
73.	Rejected	Sub 58 section 4
74.	Accepted	

Table 4: Amended AA Proposal Other Amendments or Additions not directly addressing a Draft Decision Amendment

Amendment to AA Proposal	Type of Amendment	Relevant matter from DD	DBP Supporting Submission
Amended Access Arrangement Proposal			
Paragraph 1.1	Matter Amendment	Updates the relevant version of the NGR to the version applicable at the time of the ERA's Draft Decision.	
Clause 1, T&Cs	Matter Amendment	Further amendment included to insert a definition for Gate Station (based on the SSC definition)	52
Clause 9.5(b) T&Cs	Matter Amendment	DBP has highlighted the changes to clause 9.5(b) and seeks to keep the proposed changes in relation to this clause.	52
T&Cs Clause 5.3(a)(ii), (ii) & (iv)	Minor	DBP seeks to change a minor drafting error	52
T&Cs Clause 14.7	Matter Amendment	P1 & B1 capacity relocation mechanism mirrors the relocation regime in the T1 reference service. DBP proposes an amendment to incorporate an appropriate relocation mechanism for the P1 and B1 services.	52
T&Cs Clause 17.7(b)(i)	Matter Amendment	DBP submits that is impractical for the content of Initial Notice requires a reason for a Curtailment. This additional amendment seeks to retain a clause in the current reference service T&Cs.	52
T&Cs Clause 20.4(a)(v)	Minor	Minor amendment to remove incorrect referencing.	52
T&Cs 20.4(c)	Matter Amendment	Clause 20.4 was inadvertently omitted from DBP's original proposal. This additional amendment seeks to retain a clause in the current reference service T&Cs.	52
T&Cs Clause	Matter Amendment	Seeks to remove references to "WestNet" from the	52

Amendment to AA Proposal	Type of Amendment	Relevant matter from DD	DBP Supporting Submission
28.3(b)(iv)		reference service T&Cs.	
T&Cs Clause 38	Matter Amendment	Seeks to remove references to a clause previously removed from the reference service terms and conditions.	52
T&Cs Clause 41	Matter Amendment	Seeks to update for the correct term for stamp duty.	52
T&Cs Schedule 7	Matter Amendment	Seeks to correct a broken hyperlink to the tripartite deed on DBP's website.	52
clauses 11.4 and 11.5 and associated definitions	Matter Amendment	DBP has identified some additional changes required to the tariff variation mechanisms in clauses 11.4 and 11.5 of the proposed access arrangement (and associated definitions)	57
Amended Access Arrangement Information Proposal			
Various	Minor	Various minor corrections. For example, typo at paragraph 8.3	
Capex and opex tables	Matter Amendment	The provision of actual financial information for 2015 that updates forecast information.	53 & 55
Paragraphs 1.4, 5.1	Minor	Use of defined term for clarity	
Paragraphs 5.2, 9.8(b) and 9.11	Minor drafting	Various grammatical changes	
Paragraphs 15.8, 15.9, 17.2(a)	Minor drafting	Drafting changes	

4. IMPACT OF ACT APPEALS

- 4.1 On Monday 22 February 2016, this submission was provided to the ERA pursuant to Rule 60(1) of the NGR, being the end of the revision period set by the ERA in making its Draft Decision on the Access Arrangement Proposal. On 18 February 2016, the Operator became aware that the Australian Competition Tribunal's decisions in relation to the ACT Proceedings numbered ACT 1-8 of 2015 were due to be handed down on Friday 26 February 2016 (**ACT Decision**).
- 4.2 The ACT Decision, at least in so far as it concerns rate of return issues, is likely to:
- (a) consider a range of issues of a similar nature to those which may arise before the ERA in its assessment of the Access Arrangement Proposal, particularly bearing in mind that the ERA's approach to date on rate of return is largely consistent with the approach of the AER that is being challenged in the east coast merits reviews and notwithstanding that DBP has advanced different submissions and evidence compared with the east coast businesses;
 - (b) provide greater clarity on the interpretation of the rate of return provisions of the NGR and the Access Arrangement Proposal; and
 - (c) have an impact on the ERA's assessment of the Operator's submissions on rate of return in the Access Arrangement Proposal (and other matters).
- 4.3 The Operator wrote to the ERA on 18 February seeking an extension of the revision period to allow the Operator to consider the impact that the ACT Decision may have on the interpretation of the rate of return provisions of the NGR and the Access Arrangement Proposal.
- 4.4 On 19 February 2016, the ERA declined the request.
- 4.5 This Access Arrangement Proposal (and accompanying submissions in support of this proposal) has therefore been submitted without the assistance of the ACT Decision.
- 4.6 The Operator reserves its rights to make further submissions to the ERA in accordance with Rule 59(5)(iii) of the NGR.

APPENDIX A : CLEAN VERSION OF THE AMENDED PROPOSED REVISED ACCESS ARRANGEMENT

Attachment 1: Description of the Dampier Bunbury Natural Gas Pipeline

Attachment 2: T1 Reference Service Terms & Conditions

Attachment 3: P1 Reference Service Terms & Conditions

Attachment 4: B1 Reference Service Terms & Conditions

APPENDIX B : CLEAN VERSION OF AMENDED PROPOSED REVISED ACCESS ARRANGEMENT INFORMATION

APPENDIX C : ACCESS ARRANGEMENT (MARK-UP AGAINST ORIGINAL AA PROPOSAL)

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