

## CHAMBER OF COMMERCE AND INDUSTRY

WESTERN AUSTRALIA

DBNGP access ERA-rtw.doc

14 March 2005

Mr Lyndon Rowe, Chairman Economic Regulation Authority PO Box 8469 Perth Business Centre Western Australia 6849

Dear Mr Rowe

## Proposed Revisions to the DBNGP Access Arrangement

The Chamber of Commerce and Industry of Western Australia (CCI) represents around 5000 small, medium and large enterprises from around Western Australia.

CCI is on record as seeking national consistency in standards across all industries in Australia.

Nevertheless, CCI would argue that any standard must have the purpose of delivering the most efficient and cost-effective outcome for the benefit of all of industry and the Western Australian community as a whole. Further, any standard must be appropriate and arrived at through rigorous assessment and objective deliberation.

Therefore, CCI philosophically would support the application of appropriate national standards to the operation of all pipelines.

However, CCI also acknowledges that in some cases there may be contractual obligations and shared commercial concerns that must be given full consideration in assessing and revising any arrangement to meet particular standards. It is clear that any alternative gas specifications move costs between production, shipping and use, and it is appropriate that an independent arbiter consider that investment decisions have already been made based on existing gas specifications for the Dampier to Bunbury Natural Gas Pipeline.

CCI reiterates that any standard must have the purpose of delivering the most efficient and cost-effective outcome for the benefit of all of industry and the Western Australian community as a whole.

Yours sincerely

Chief Executive

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