

Enquiries: Michael Kane
Our Ref.: EPE

21 August 2001

Office of Gas Access Regulation
PO Box 8469
Perth Business Centre
WA 6849

OffGAR DBNGP Draft Decision July 2001 – Submission from Australian Services Union

Dear Sir

The Australian Services Union (ASU) represents members employed by various Epic Energy companies working on the Dampier to Bunbury Natural Gas Pipeline and on other pipelines across Australia. The ASU also represents members in various energy industry companies across Australia; both privately and publicly owned.

The ASU's submission in respect to the OffGAR Draft Decision ("the Draft Decision") does not seek to address any of the technical issues of the draft decision but seeks to highlight the potential impact on Epic Energy employees and their families.

It is the ASU's submission that any final decision of OffGAR should encourage the stable development of the energy industry in Western Australia. Government regulators regardless of the sector of the energy industry should be encouraging stable growth to facilitate economic growth in the state and to ensure stable and beneficial employment conditions for Western Australians employed in the industry.

Any draft decision that impacts on Epic Energy's capacity to maintain their business operation in Western Australia would impact on the livelihood of ASU members. The ASU would submit that the review of the draft decision should therefore take into account the likely consequences of the implementation of the draft decision for Epic Energy employees.

Epic Energy has indicated publicly that the implementation of the draft decision would impact on the expansion of the DBNG's capacity. Epic Energy has also stated that the draft decision would have a major economic impact on the company's financial position and viability in Western Australia. It is of concern to the ASU that any final decision that reduces the profitability of the DBNG pipeline ("the DBNG") to unreasonable and unsustainable levels will lead Epic

Energy or any successor to operate and maintain the DBNG in an undesirable manner.

It is the view of the ASU members at Epic Energy that the DBNG is operating at maximum efficiency in terms of staffing levels and operational practices. Any decision that requires Epic Energy or any successor to make major cost reductions on the DBNG would lead to job losses, a deterioration in the asset, unreasonable levels of stress on the workforce and a decrease in occupational health and safety levels.

In conclusion in making the final decision the ASU would seek that OffGAR be cognisant of the impact that the decision would have on employees working on the DBNG Pipeline, whether they be working for Epic Energy or any successor, and on the long term economic growth of Western Australia.

Yours faithfully

Paul Burlinson
Branch Secretary