



22nd August, 2001.

Mr D. Michael AM,
Western Australian Independent Gas Pipelines,
Access Regulator,
Office of Gas Access Regulation,
P. O. Box 8469,
PERTH BUSINESS CENTRE W AUST 6869

ATTENTION: Mr R. Pullella,

Dear Sir,

**DRAFT DECISION ON DAMPIER TO BUNBURY NATURAL GAS PIPELINE
ACCESS ARRANGEMENT**

Drive Safe Australia is a small company that provides a service to Epic and we have been associated with Epic ever since they took over the pipeline.

We have read with interest the draft decision and the comments that have followed its release, especially comments relating to the potential consequences that the draft decision, if implemented, is likely to have on not just Epic Energy but the wider business, investment and general community.

While consumers always welcome reductions in tariffs for the supply of such vital services such as gas transportation, it must not be at the expense of the safety of the community and the level of services available to the community. Based on comments that have been made since the release of your draft decision, these are likely consequences.

Epic Energy has stated that the draft decision, if implemented, would place the company in severe financial distress. As a result, it could have the effect of reducing Epic Energy's ability to continue its maintenance and capital program. Surely a pipeline operator would itself agree to tariffs at a level that would compromise its statutory safety and maintenance obligations, not to mention levels that would place it in severe financial distress.

Our company assists Epic Energy in the implementation of its Safety Program and it concerns us that any initiative that is not market driven and which artificially



reduces revenue will place an immediate strain on the organisation in their ability to meet their safety obligations.

We appreciate that we have a vested interest in making this submission. However, we believe that these consequences should be paramount in your considerations that you must take into account when assessing the allowable tariffs. Any decision which puts an operator in a position which compromises its ability to safely operate and maintain a pipeline must be rectified.

We therefore trust that you will be able to appreciate the wider ramifications of this draft decision and take them into account when making your final decision.

We support Epic Energy's stance on this matter and urge you to reconsider the content of your draft decision when making the final decision.

Yours sincerely,

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John van Leeuwen,
MANAGING DIRECTOR

DRIVE SAFE AUSTRALIA