



19 September 2005

Mr Lyndon Rowe
Chairman
Economic Regulatory Authority
Level 6, Governor Stirling Tower
197 St Georges Terrace
PERTH WA 6000

Dear Mr Rowe

Submission in relation to Economic Regulatory Authority's DBNGP Draft Decision and DBNGP(WA)T Submission #27

This letter is Origin Energy's submission to the Economic Regulatory Authority (Authority) in response to DBNGP(WA) Transmission Pty Ltd (DBNGP(WA)T) Submission #27 entitled "Response to Draft Decision Amendments".

In the Draft Decision the Authority stipulated in Amendment 5 that the DBNGP(WA)T had to provide for a Part Haul Reference Service, calculated on a distance based tariff, in the nature of a "T1 Service" to which the Standard Shipper Contract would apply. Origin Energy supports the Authority's decision on this matter.

Origin Energy notes that DBNGP(WA)T have put in a submission to the Authority responding to this amendment, which states that it will not provide for such a service in its Access Arrangement.

Origin Energy requests the Authority to reject DBNGP(WA)T position on this matter and retain this amendment in its final decision for the following reasons:

- a significant number of submissions have been made requesting this service;
- a part haul tariff is not new, it is provided for in the existing approved Access Arrangement, as a zonal tariff and was a distance based tariff in the Gas Transmission Regulations;
- a non-reference service and tariff would mean that negotiations by potential part haul shippers for access on Dampier to Bunbury Natural Gas Pipeline (DBNGP) would be potentially prolonged and costly, which would disadvantage these shippers and their customers;
- access to a part haul reference service would enable shippers to have contracts in place, which would allow them to provide their customers with security of gas supply when there are restrictions on the DBNGP; and

Origin

- the Parmelia Pipeline has the only gas storage facility at Mondarra and access to this via the DBNGP on reasonable terms would provide further opportunities for growth in the gas market.

Please revert if you require clarification of any matters raised in this submission.

Regards



David Geddes
Manager, Marketing & Commercial (WA)