

**PII Ltd**

Asia Pacific Representative Office  
Unit 3A06, Block G,  
Phileo Damansara 1,  
Seksyen 16,  
46350 Petaling Jaya, Selangor  
Malaysia

Tel 60 3 7958 1828

Fax 60 3 7958 1923

Webpage : [www.piigroup.com](http://www.piigroup.com)

Email : [support@pii-my.com](mailto:support@pii-my.com)

Dr K Michael AM  
Western Australian Independent Gas Pipelines  
Access Regulator  
Office of Gas Access Regulation  
PO Box 8469  
PERTH BUSINESS CENTRE WA 6869

Attention: Mr R Pullella

**Draft Decision on Dampier to Bunbury Natural Gas Pipeline Access Arrangement**

PII is an international organisation that provides pipeline integrity support services to the industry. It has to date carried out integrity management services to Epic's assets and more recently the intelligent pigging of the DBNGP.

We 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 have the effect of reducing Epic Energy's ability to continue its maintenance and capital program. Surely no pipeline operator would itself agree to tariffs at a level that would compromise its statutory safety and maintenance obligations.

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.

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.

Sincerely

**Jean Tergiman**  
**General Manager**  
**Asia Pacific Region**

