

17 November 2025

Tyson Self
Assistant Director - Gas
Economic Regulation Authority
Level 4, Albert Facey House
469 Wellington Street
Perth WA 6000

Dear Tyson,

**Re: Response to ERA Draft Decision Dampier Bunbury Pipeline (DBP) Access Arrangement (AA6)
2026-30: Further Consultation**

Newgen Power Kwinana (**NPK**) appreciates the opportunity to provide this submission in response to the Economic Regulation Authority's (**ERA**) Draft Decision on DBP's Access Arrangement 6 (**AA6**) (**Draft Decision**) Further Consultation Paper

Question 1:

The ERA seeks feedback on its proposed amendments to the access arrangement for the DBNGP to treat the net revenue DBP generates from overrun gas charges as reference service revenue. In adopting this treatment approach, the ERA proposes to introduce a new "overrun tariff" component into the reference service tariff for the T1/P1/B1 Service, which will result in numerous amendments to the access arrangement. These amendments are set out below. Please provide feedback on the proposed amendments.

NPK supports the ERA's proposed amendments to treat net overrun gas charge revenue as reference service revenue and to introduce a defined "overrun tariff" within the T1/P1/B1 reference service structure. The changes will lead to increased transparency, cost-reflectivity for a service that has become increasingly relied on by shippers to manage daily volatility.

Question 2:

The ERA seeks feedback on its proposed amendments to the access arrangement for the DBNGP to introduce a new fixed principle for demand adjustments to address demand uncertainty. This new fixed principle will result in numerous amendments to the access arrangement. These amendments are set out below. Please provide feedback on the proposed amendments.

NPK supports the ERA's proposed amendments to introduce a new fixed principle for demand adjustments to address demand uncertainty within the DBNGP Access Arrangement.

Given the increasing variability in gas demand across the market, the introduction of demand adjustment mechanism for managing forecast demand will alleviate the current tariff setting challenges around forecast uncertainty for both the pipeline operator and shippers.

If you would like to discuss any of these matters further, please feel free to contact me.

Yours Sincerely,



Bobby Ditric

Executive General Manager – Trading, Commercial & Regulatory