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28 October 2016

Mr Craig Madden Director Australian Energy Regulator 360 Elizabeth St Melbourne Victoria 3001





Dear Mr Madden,

Proposed 2016 Albury Reference Tariffs

This letter sets out Australian Gas Network's reasons for varying its Reference Tariffs to apply from 1 January 2017. Australian Gas Networks (AGN) is proposing to vary its Reference Tariffs in a manner that is consistent with clause 4.3 of the Access Arrangement for Envestra's Albury Gas Distribution System (hereafter referred to as the Access Arrangement).

Reference Tariffs: Residential, Commercial and Demand Haulage Reference Services

The proposed adjustments to the Reference Tariffs for residential (Tariff R), commercial (Tariff C) and demand (Tariff D) Haulage Reference Services to apply from 1 January 2017 are being made pursuant to clause 4.3 of the Access Arrangement. This allows Reference Tariffs to vary in accordance with a weighted average tariff basket mechanism, as detailed in section 4.4 and Annexure D of the Access Arrangement. Annexure D contains a Reference Tariff Control Formula and a Rebalancing Control Formula.

In broad terms, the Reference Tariff Control Formula allows AGN to change its tariffs so that the revenue derived from each of the Haulage Reference Services does not increase by an amount that is greater than (1+CPI)x(1-X)x(1+L). The CPI is the change in the CPI for the 12 months to September 2016, which CPI is 1.3 per cent. The Licence Fee factor is -0.02% and X factor is 0%. The combination of the CPI, L factor and X factor results in an allowed change in Reference Tariffs for 2016 of 1.3 per cent.

The Rebalancing Control Formula allows AGN to change its tariffs so that the change in the revenue derived from an individual tariff within a particular category of Haulage Reference Service is no greater than (1+CPI)x(1-X)x(1+L)x(1+2%). This allows a particular tariff to increase by no more than 3.3 per cent.

AGN's proposed 2016 Reference Tariffs comply with both the Reference Tariff Control Formula and the Rebalancing Control Formula. This has been demonstrated by the model provided to the AER setting out the application of the above formulae and the resultant Reference Tariffs. The model, tariff schedule and 2012/13 Licence Fee advice comprise attachments 1, 2 and 3 respectively of this submission.

¹ IPART is yet to provide AGN the Licence Fee for 2014/15 or 2015/16. AGN has therefore used the Licence Fee from 2013/14 of \$13,400 (refer attachment 3).

The Reference Tariff Control Formula and the Rebalancing Control Formula require the quantities used to be the period two years prior to the year that the proposed tariffs take effect, which in this case is 2015. An independent review verifying the gas quantities has been undertaken and the associated report is provided as attachment 4.

Impact on Users

The table below shows the average impact on end users of the proposed change in tariffs on a GST exclusive basis.

Change in Average Customer Charge

| Component | 2017 (\$) | 2016 (\$) | Quantity (p/a) | Cost Change (\$) |
|-----------|-----------|-----------|-------------------|------------------------|
| Tariff R | 292.90 | 288.70 | 44.7 GJ | 4.20 |
| Tariff C | 1,005.30 | 963.3 | 301.8 GJ | 42.00 |
| Tariff D | 39,316.90 | 38,813.80 | 44.5 GJ MHQ | 503.10 |

Reference Tariffs: Ancillary Reference Services

AGN has also varied its Ancillary Reference Tariffs in a manner that is consistent with clause 4.4.2 of the Access Arrangement. Ancillary Reference Tariffs are to be adjusted by the annual change in the CPI, which is also calculated as the change in CPI for the 12 months ending September 2016. The calculation and resultant tariffs also form part of attachments 1 and 2.

Summary

Attachment 1 comprises the model demonstrating the derivation of the proposed Reference Tariffs while attachment 2 comprises the tariff schedule detailing the proposed tariffs to apply from 1 January 2017. Attachment 3 provides the 2012/13 Licence Fee advice while attachment 4 comprises the findings of the independent review of the 2015 quantities.

Please contact me on 08 8418 1112 should you wish to discuss this matter further.

Yours sincerely

Peter Bucki

Manager Regulatory Strategy

