



June 25, 2012

Warwick Anderson  
General Manager  
Network Regulation Branch  
Australian Energy Regulator  
GPO Box 3131  
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ACT 2601

**Re: Feedback on APTPPL requirements on RBP queuing policy**

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Dear Warwick,

BP Australia Pty Ltd (BP) is a significant Shipper on the Roma to Brisbane Pipeline (RBP) and view fair and economically efficient access to this pipeline as an essential element to support the ongoing operations of the BP Bulwer Island Refinery (BPR).

BP welcomes the opportunity to provide feedback to the RBP Access Arrangement (AA), in particular, the mechanism proposed for queuing for Gas Transportation on the RBP under the APTPPL Revised Access Arrangement Proposal dated May 2012.

BP has carefully reviewed the recommendations from APTPPL with respect to improving the queuing process and wish to put forward the following feedback:

1. APTPPL: A non-refundable deposit is required to secure a position on the Existing Capacity queue;

BP: Whilst understanding the reasons why APTPPL is seeking to streamline the re-contracting mechanism for existing capacity, BP is not supportive of the deposit proposal in it's current form and in particular, a the non refundable nature of deposit should the prospective Shipper not proceed. BP believes the crux of the APTPPL issue is not related to the queue, but more to the process in contracting capacity when available.

BP suggests an alternative two steps approach which seeks not to make it difficult to remain on the queue, but rather looks to pragmatically streamline the contracting process:

i/ A Prospective Shipper in the queue, is given a limited window (e.g. 10 business days) to respond to an opportunity to contract available RBP existing transport as a result of their priority on the Existing Capacity Queue.

ii/ Should the prospective shipper require more time after this period to process this opportunity, a mechanism is built into the AA to enable APTPPL to recover foregone existing capacity revenue that results from the contracting delay.



2. APTPPL: Shippers on the Existing Capacity queue may be required to confirm every three months that the capacity is still required. Failure to confirm would result in removal from the queue;

BP: BP is supportive of a review of the Existing Capacity queue; however, as to add to the validity of the process and the time committed, suggest that this process is conducted annually as opposed to every three months.

3. APTPPL: Shippers interested in Developable Capacity are welcome to lodge an expression of interest which will inform APTPPL regarding the needs of the market. Developable Capacity will be subject to an open season process subject to bilateral negotiation.

BP: BP is supportive of this approach for Developable Capacity on the RBP.

BP feels that the feedback above will provide a balance between giving APTPPL greater control over the mechanisms which shippers use to engage APTPPL for Transport Services on the RBP, without placing undue and unfair burden on shippers.

If you would like to discuss this matter further, please do not hesitate to contact me on (03) 9268 3344.

Best Regards,

A handwritten signature in black ink, appearing to read 'Tam Pham', is located below the 'Best Regards,' text.

Tam Pham  
Energy Business Development Manager  
BP Australia Pty Ltd