Agius, Karen

From:	Country Energy - Natalie.Banicevic@countryenergy.com.au
Sent:	Friday, 1 August 2008 1:52 PM
То:	Gleeson, Gwenda
Cc:	bill.frewen@CountryEnergy.com.au; Jason.Cooke@CountryEnergy.com.au; Buckley, Mike; Johnston, Trevor
Subject:	Re: CRP CTP access arrangement proposal [SEC=UNCLASSIFIED]
Attachments:	CRP access arrangement amendment proposal.pdf

CRP access angement amendm Dear Ms Gleeson

Thank you for the opportunity to comment on the Central Ranges Pipeline Pty Ltd proposal.

Firstly, in regard to written communication from Central Ranges Pipeline advising Country of the revised proposal, I have inquired internally and it appears that Country Energy has not received this communication. In view of this, it would be difficult to comment on aspects of the information contained in this communication, at this time. However based on the tariff variation proposal forwarded by the AER we do wish to make the following comments.

In terms of a delayed CPI increase, Country Energy is in a position to pass through the increases even though they are delayed from the previously known date of 1 July 2008.

Of concern is the proposal to amend the access arrangement by reducing the notification date from 50 business days to 30 business days. This does present difficulties for Country Energy. In order to effectively pass through increases, sufficient time is required to ensure retail prices are amended and implemented in accordance with our own policies and regulatory requirements. Changing the notification period will contribute to further misalignment to Country Energy gas networks notification period (which is also 50 days) and also electricity arrangements. Current practice for 1 July price changes for electricity network price changes is that DNSPs must provide proposals to IPART by the first Monday of April for price changes from 1 July. Country Energy believes the current notification period of 50 days should remain unchanged.

Please do not hesitate to contact me should you require any further information.

Regards Natalie

Natalie Banicevic General Manager Regulatory Affairs

"Gleeson, Gwenda" <gwenda.gleeson@a er.gov.au> To <Natalie.Banicevic@countryenergy.co 28/07/2008 12:36 m.au> PM сс <Jason.Cooke@CountryEnergy.com.au>, <bill.frewen@CountryEnergy.com.au>, "Buckley, Mike" <Mike.Buckley@accc.gov.au>, "Johnston, Trevor" <Trevor.Johnston@aer.gov.au> Subject CRP CTP access arrangement proposal [SEC=UNCLASSIFIED]

Dear Ms Banicevic

We write in relation to a proposal from Central Ranges Pipeline Pty Ltd to amend its annual tariff for 2008-09. As we understand that Country Energy is the only affected user of the distribution pipeline. We attach for your reference the proposal and understand the Central

Ranges Pipeline Pty Ltd has also written to you regarding this issue.

The basis of the proposal is to seek an amendment to the existing competitive tender access arrangement to reflect tariffs that would have prevailed for 2008/09 under this arrangement. There is also a change to the notification time period for annual tariff variations. The proposal is not retrospective and if the amendment was approved would relate to forward looking charges for services on the pipeline possibly from 1 September 2008.

We would appreciate if you have any feedback about the proposed that you would contact myself by 5pm this Friday 1 August 2008. Feel free to call me if you have any queries or questions.

Yours sincerely

<<CRP access arrangement amendment proposal.pdf>>

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