



N.T. GAS Pty. Limited
ACN 050 221 415
IN TRUST FOR THE AMADEUS GAS TRUST ABN 68 348 460 818

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Our Ref: 1927 / 20.1.2

31 July 2008

Mr Mike Buckley
General Manager
Network Regulation North Branch
Australian Energy Regulator
GPO Box 3131
CANBERRA ACT 2601

Dear Mike

2007 / 2008 RING FENCING COMPLIANCE REPORT

Please find attached the signed Ring Fencing Compliance report for the Amadeus Basin to Darwin Pipeline covering the year to 30 June 2008.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Janet Jones', written over a circular stamp.

JANET JONES
Company Secretary

Attach: Statement of Compliance
Ring Fencing Compliance Report

Statement of Compliance

**Statement of Compliance for N.T. Gas Pty. Limited ACN 050 221 415
("NT Gas") for the financial year 2007 / 2008.**

NT Gas – Amadeus Basin to Darwin Pipeline

1. Attached is the annual Ring Fencing Compliance Report for the year ending 30 June 2008. NT Gas has not varied the Ring Fencing Compliance Report or Statement of Compliance from the original forms sent by the ACCC, other than to provide the information required.
2. NT Gas is not aware of any breach of any of the obligations listed in section 4.1 of the Code other than as detailed in this report.
3. NT Gas has maintained a compliance program during the relevant period that ensures that:
 - (a) appropriate internal procedures have been established and maintained to ensure compliance with the obligations in section 4.1 of the *National Third Party Access Code for Natural Gas Pipeline Systems* (the Code);
 - (b) an accurate assessment of these procedures has been made;
 - (c) the General Manager of NT Gas is made aware of any breaches of the ring fencing obligations;
 - (d) remedial action is taken as soon as possible to rectify breaches of the minimum ring fencing obligations and that completion of this action is reported to the Board of Directors;
 - (e) the compliance program is reviewed regularly and as necessary.
4. The Board of Directors of NT Gas has approved this report on ~~30~~ July 2008.


Signed by:



NAME:

GENERAL MANAGER/
CHIEF EXECUTIVE OFFICER

DATE: 30 July 2008



NAME:

DIRECTOR

DATE: 30 July 2008

Ring Fencing Compliance Report

Ring Fencing Compliance Report for N.T. Gas Pty. Limited ACN 050 221 415 ("NT Gas") for the financial year 2007 / 2008.

Definitions

Unless otherwise defined, all capitalised terms used in this document have the meaning given to them in section 10.8 of the Code.

For periods prior to 1 July 2008 reference are to the National Gas Code.

Compliance with minimum ring fencing obligations

NT Gas submits this report under section 4.13 of the Code. The report describes the measures taken to ensure compliance with its obligations under section 4 and provides an accurate assessment of the effect of those measures.

NT Gas will, pursuant to its obligations under the National Gas Law and Rules, notify the Commission immediately on becoming aware of a breach (or potential breach) of its obligations under the National Gas Law and Rules. Notification should be directed to the General Manager, Network Regulation North Branch, AER.

1. Service Provider is a legal entity

Section 4.1(a) of the Code requires a Service Provider to be a legal entity.

N.T. Gas Pty. Limited, A.C.N. 050 221 415 ("NT Gas") is a legal entity incorporated under the *Corporations Act 2001*. As trustee for the Amadeus Gas Trust, NT Gas operates the Amadeus Basin to Darwin Pipeline ("ABDP").

2. Not carry on a Related Business

Section 4.1(b) of the Code requires that a Service Provider not carry on a Related Business (essentially a business of producing, purchasing or selling natural gas).

NT Gas manages and operates the ABDP and its laterals. NT Gas does not (on its own account) produce natural gas, and does not (on its own account) purchase or sell natural gas other than for operational purposes for the ABDP. The sale and purchase of natural gas for operational purposes is not a Related Business as defined in section 10.8 of the Code.

Pursuant to pre-existing agreements of which the Commission is aware, NT Gas is contractually committed to buy and sell natural gas. However, fulfilment of NT Gas' obligations under these agreements does not require NT Gas to participate actively in the sale or purchase of gas.

The table in Attachment 1 lists NT Gas' Service Provider's Associates under the Code. These associates are companies in the APA Group.

3. Establish and maintain separate and consolidated sets of accounts

Section 4.1(c) of the Code requires Service Providers to establish and maintain separate accounts for the activity that is the subject of each Access Arrangement.

Section 4.1(d) of the Code requires Service Providers to establish and maintain a consolidated set of accounts for all the activities undertaken by the Service Provider.

NT Gas has established and maintains a separate set of accounts for services provided by means of the ABDP.

NT Gas has established and maintains a consolidated set of accounts for the entire business of NT Gas as required under the *Corporations Act 2001*.

4. Allocation of shared costs

Section 4.1(e) of the Code requires Service Providers to allocate costs in a fair and reasonable manner that is consistent with the principles in section 8.1 of the Code.

- The direct costs of managing, operating and marketing the ABDP are charged directly to NT Gas;
- Labour and labour-related costs and corporate overheads are allocated on the basis of actual man-hours worked in respect of the ABDP. This allocation of shared costs to pipelines to which NT Gas provides services is on a fair and reasonable basis.

5. Treatment of Confidential Information

Under sections 4.1(f) and (g) of the Code, Service Providers must ensure that:

- *Confidential Information provided by a user or prospective user is used only for the purposes for which it was provided and is not disclosed without the user or prospective user's consent; and*
- *Confidential Information obtained by a Service Provider which might reasonably be expected to materially affect the commercial interests of a user or prospective user is not disclosed to any other person without the permission of the user or prospective user to whom the information pertains.*

Note that where functions of the Service Provider have been outsourced to a third party, the Service Provider is responsible for ensuring that any Confidential Information provided to the third party is handled in accordance with sections 4.1(f) and (g) of the Code.

- All staff involved with the management and operation of the ABDP provide services under contract. NT Gas has required that all contractors having access to Confidential Information observe the requirements of the Code in relation to such Confidential Information. In particular, while Alinta or its subsidiary Agility, provided a range of management, operations and regulatory services to NT Gas up till 1 October 2007, NT Gas ensured that it was aware of, and complied with, its obligations to maintain the confidentiality of all information / data that may come into its possession while providing such services to NT Gas;

- NT Gas's offices are secured;
- NT Gas's computer network has security arrangements which provide access only to approved personnel;
- NT Gas reviews its procedures and policies annually, and these are part of a quality system certified to AS 9001.
- Code requirements are reinforced by NT Gas's Ringfencing Policy. Under that Policy, new staff receive training which is appropriate to their duties, and existing staff receive periodic refresher training; and
- Quarterly Code compliance reviews reinforce management awareness of obligations relating to confidential information.

6. Marketing Staff

Service Providers must ensure that:

- *their Marketing Staff (essentially those directly involved in sales, sale provision or advertising for the Service Provider) are not also working for an Associate that takes part in a Related Business (section 4.1(h) of the Code); and*
- *the Marketing Staff of an Associate involved in a Related Business are not also working for the Service Provider (section 4.1(i) of the Code).*

Note that in answering the questions below, the broadest possible meaning is to be given to 'servants, consultants, independent contractors or agents'.

Attachment 1 lists NT Gas' Associates. NT Gas does not have any Associates which take part in a Related Business (i.e. the producing, buying or selling of natural gas except for operational purposes) other than the following Associates:

- N.T. Gas Distribution Pty. Limited;
- APT Parmelia; and
- APT Facility Management.

N.T. Gas Distribution Pty. Limited, which operates as a bundled utility and therefore carries on a Related Business, is an Associate of NT Gas. The Commission has granted a waiver to NT Gas of the obligations of sections 4.1(h) and (i) of the Code in relation to the provision of services by the Marketing Staff of NT Gas to NT Gas Distribution.

None of NT Gas' Marketing Staff are servants, consultants, independent contractors or agents or otherwise provide services to APT Parmelia (located in Western Australia) or APT Facility Management Pty Limited.

APT Parmelia (Western Australia) is in the process of exiting its Related Business. This retail business carried on by APT Parmelia is a residual activity reflecting the actions of previous owners. As sales contracts expire they are not renewed. The two remaining sales contracts will expire by 2009.

APT Facility Management Pty Limited ABN 91 124 754 365 buys and sells gas for the purposes of co-generation and natural gas for vehicles.

Gas for co-generation is purchased and sold at in Queensland at Baillie Henderson Hospital (Toowoomba), Redcliffe Hospital (Redcliffe) and Toowoomba Base Hospital (Toowoomba).

Gas for natural gas vehicles is purchased in Western Australia. The gas, once purchased, is compressed and sold as compressed natural gas to the Public Transport Authority of Western Australia. It is delivered to the following bus depots – Morley, Bayswater, East Perth, Fremantle, Southern River, Rockingham and Welshpool.

None of the Marketing Staff of APT Parmelia or APT Facility Management Pty Limited are servants, consultants, independent contractors or agents or otherwise provides services to NT Gas.

Attachment 1:

The table below indicates NT Gas' Associates under the Code on 30 June 2008.

It should be noted that on 2 July 2007 APA acquired Origin Energy Networks, and its various companies are included in the tables below. APA also acquired 17.2% of Envestra at this time but this is not noted in the following tables as it is not a controlling interest.

Name of Each Associate	Business Carried On	Regulated Assets Owned
Corporate		
Australian Pipeline Limited ACN 091 344 704	Responsible entity for the Australian Pipeline Trust and APT Investment Trust.	
APT Pipelines Limited ACN 009 666 700	Parent investment company for Australian Pipeline Trust.	
APT Management Services Pty Limited ACN 091 668 110	Provision of staff and administration to subsidiaries.	
APT Rights (Holdings) ACN 123 090 933	Operator of various assets.	
BGP Asset Pty Limited ACN 120 164 678	Inactive.	
Moomba to Sydney Pipeline		
Trans Australia Pipeline Pty Limited ACN 006 699 378 (formerly ACN 006 699 378 Pty Limited)	Holds shares in Gasinvest Australia Pty Limited (MSP).	
Gasinvest Australia Pty Limited ACN 065 055 478	Holds shares in East Australian Pipeline Pty Limited (MSP).	
Agex Pty Limited ACN 008 458 580	Holds shares in APT Pipelines Investments (NSW) Pty Limited. Holds shares in NT Gas Pty Limited. Unitholder in Amadeus Gas Trust.	
APT Pipelines Investments (NSW) Pty Limited ACN 065 070 966	Holds shares in East Australian Pipeline Pty Limited (MSP).	
East Australian Pipeline Pty Limited ACN 064 629 009	Owns and operates gas pipeline.	Moomba – Sydney Pipeline (MSP). Not covered from Moomba to Marsden and Wagga Wagga to Culcairn.
Central West Pipeline		
APT Pipelines (NSW) Pty Limited ACN 080 842 360	Owns and operates gas pipeline.	Central West Pipeline.

Name of Each Associate	Business Carried On	Regulated Assets Owned
Roma to Brisbane Pipeline		
Sopic Pty Limited ACN 010 851 288	Holds shares in APT Petroleum Pipelines Holdings Pty Limited. Holds shares in NT Gas Pty Limited. Unitholder in the Amadeus Gas Trust.	
APT Petroleum Pipelines Holdings Pty Limited ACN 009 738 489	Holds shares in APT Petroleum Pipelines Limited (RBP). Owns and operates Kogan North Gas Processing facility (Coal seam methane).	
APT Petroleum Pipelines Pty Limited ACN 009 737 393	Owns and operates gas pipeline.	Roma – Brisbane Pipeline (RBP) and Peat Lateral.
Carpentaria Gas Pipeline and Cannington Lateral		
Roverton Pty Limited ACN 011 071 917	Owns and operates gas pipeline.	70% interest in Carpentaria Gas Pipeline. Also 100% ownership of MIM Lateral and Mica Creek Meter Station (not covered).
APT Pipelines (QLD) Pty Limited ACN 080 382 387	Owns and operates gas pipeline.	30% interest in Carpentaria Gas Pipeline. Also 100% interest in Cannington Lateral (not covered).
Amadeus Basin to Darwin Pipeline (Note NT Gas Pty Limited and NT Gas Distribution Pty Limited are not wholly owned subsidiaries of APT Pipelines Limited)		
Agex Pty Limited ACN 008 458 580	As above, under the Moomba to Sydney Pipeline.	
Sopic Pty Limited ACN 010 851 288	As above, under the Roma to Brisbane Pipeline.	
NT Gas Pty Limited ACN 050 221 415	Trustee for Amadeus Gas Trust; owns and operates gas pipelines.	Amadeus Basin – Darwin Pipeline.
Other NT Pipelines		
NT Gas Distribution Pty Limited ACN 071 741 618	Owns gas distribution system; retails gas to customers.	Darwin City Gate – Berrimah Pipeline and Darwin Distribution Network (not covered). Katherine sleeper factory lateral (not covered). Tennant Creek sleeper factory lateral (not covered).
APT Pipelines (NT) Pty Limited ACN 075 733 336	Owns gas pipelines.	Mt. Todd and Mataranka Laterals (not covered).

Name of Each Associate	Business Carried On	Regulated Assets Owned
NT Gas Easements Pty Limited ACN 051 412 643	Holds pipeline easements in NT.	
APT Bonaparte Pty Limited ACN 120 164 650	Constructing a new pipeline in the Northern Territory. (Bonaparte Pipeline).	Bonaparte Pipeline under construction (not covered)
BGP Tenure Holdings Pty Limited ACN 128 987 968	Ownership of easements and property in relation to the Bonaparte Pipeline	
APA Pipelines (WPP) Pty Limited ACN 131 331 676	Ownership of proposed Wickham Point Pipeline	Proposed Wickham Point Pipeline (not covered)
Goldfields Gas Pipeline		
APT Pipelines Investments (WA) Pty Limited ACN 081 638 244	Holds 55% interest in SCP Investments (No.1) Pty Limited (GGT). Holds 100% interest in Western Australian Gas Transmission Company 1 Pty Limited.	
Western Australian Gas Transmission Company 1 Pty Limited ACN 081 780 387	Holds 100% of APT Goldfields Pty Limited. Holds 100% of APT Parmelia Gas Pty Limited. Holds 100% of APT Parmelia Holdings.	
APT Goldfields Pty Limited ACN 084 545 344	Holds 45% interest in SCP Investments (No.1) Pty Limited (GGT).	
SCP Investments (No.1) Pty Limited ACN 084 521 817	Holds shares in SCP Investments (No.2) Pty Limited and SCP Investments (No.3) Pty Limited and Goldfields Gas Transmission Pty Limited (GGT).	
SCP Investments (No.2) Pty Limited ACN 084 521 951	Holds shares in Southern Cross Pipelines Australia Pty Limited (GGT).	
SCP Investments (No.3) Pty Limited ACN 085 991 984	Holds shares in Southern Cross Pipelines (NPL) Australia Pty Limited (GGT).	
Goldfields Gas Transmission Pty Limited ACN 004 273 241	Operates gas pipelines (for GGT Joint Venture).	
Southern Cross Pipelines Australia Pty Limited ACN 084 521 997	Holds an interest in Goldfields Gas Pipeline. Holds 100% of Kalgoorlie Kambalda lateral.	62.7% interest in Goldfields Gas Pipeline (GGT). 100% interest in Kalgoorlie Kambalda lateral.

Name of Each Associate	Business Carried On	Regulated Assets Owned
Southern Cross Pipelines (NPL) Australia Pty Limited ACN 085 991 948	Holds an interest in Goldfields Gas Pipeline.	25.5% interest in Goldfields Gas Pipeline (GGT).
Parmelia Pipeline		
Western Australian Gas Transmission Company 1 Pty Limited ACN 081 780 387	As above under Goldfields Gas Pipeline.	
APT Parmelia Gas Pty Limited ACN 098 386 317	No activities.	
APT Parmelia Holdings Pty Limited ACN 115 930 768	Holds 100% of APT Parmelia.	
APT Parmelia Pty Limited ACN 078 902 397	Owns gas pipeline, retails gas to customers.	Owns 100% of Parmelia pipeline (not covered).
Other WA Pipelines		
Gas Transmission Services WA (Holdings) Pty Limited ACN 106 043 298	Holds 100% of Gas Transmission Services WA (Operations) Pty Limited.	
Gas Transmission Services WA (Operations) Pty Limited ACN 106 043 332	Owns interests in gas pipeline/laterals in WA.	Pipeline supplying Telfer (not covered).
APT Pipelines (WA) Pty Limited ACN 066 343 584	Owns interests in gas pipeline/laterals in WA and provides management services for pipeline assets.	Owns Westlime Lateral, Wiluna Lateral and 50% of Mid West Pipeline (not covered).
Murraylink		
APT Energy Pty Limited ACN 118 894 769	Ownership of Murraylink electricity transmission asset.	Ownership of regulated Murraylink electricity transmission asset.
Murraylink (No 1) Pty Limited ACN 095 833 462		
Murraylink (No 2) Pty Limited ACN 095 760 375		
Murraylink Transmission Company Pty Limited ACN 089 875 605		

Name of Each Associate	Business Carried On	Regulated Assets Owned
Murraylink Transmission Partnership ABN 79 181 207 909		
Directlink		
APT Directlink Holdings Pty Limited ACN 122 978 349	Ownership of Directlink electricity transmission asset.	Ownership of regulated Directlink electricity transmission asset.
Directlink (No. 1) Pty Limited ABN 85 085 123 468		
Directlink (No. 2) Pty Limited ABN 87 095 439 222		
Directlink (No. 3) Pty Limited ABN 86 095 449 817		
GasNet Victoria		
GasNet Australia Pty Limited ABN 79 096 457 868	Responsible entity for GasNet Australia Trust and GasNet Australia Investments Trust. Owns 100% of GasNet Australia (Holdings) Pty Limited	
GasNet Australia Investments Pty Limited ABN 95 104 348 852	Owns 100% of Gas Investments Australia (Holdings) Pty Limited	
GasNet Australia (Holdings) Pty Limited ABN 68 104 581 142	Owns 100% of GasNet Australia (Operations) Pty Limited	
GasNet Australia (Operations) Pty Limited ABN 65 083 009 278	Owns and operates gas pipelines. Owns 100% of GasNet Australia (NSW) Pty Limited and GasNet A Pty Limited and GasNet B Pty Limited	GasNet System assets (excluding the NSW assets). These assets including the covered PTS assets.
GasNet Australia (NSW) Pty Limited ABN 14 079 136 413	Owns gas assets.	Owns GasNet interconnect assets in NSW.
GasNet A Pty Limited ABN 17 087 673 907	GasNet Australia Group company.	
GasNet B Pty Limited ACN 083 009 303	GasNet Australia Group company.	
Gas Investments Australia (Holdings) Pty Limited ABN 85 106 043 252	Owns 100% of Gas Transmission Services WA (Holdings) Pty Limited	

Name of Each Associate	Business Carried On	Regulated Assets Owned
Allgas Queensland		
APT Allgas Energy Pty Limited ACN 009 656 446	Owns and operates gas network.	Gas networks in south east Queensland.
APT Allgas Pipelines Operations Pty Limited ACN 076 666 807	Holds pipeline easements in Queensland.	
APT Allgas Toowoomba Pty Limited ACN 009 655 645	Owns gas assets.	Some gas assets in regional south east Queensland.
SeaGas Pipeline (Victoria and SA)		
APT Pipelines (SA) Pty Limited ABN 87 124 754 347	Owns 100% of APT Seagas Holdings Pty Limited and owns and operates SESA pipeline.	SESA pipeline (uncovered)
APT Sea Gas Holdings Pty Limited ACN 124 754 767	Ownership of APT SPV2 and APT SPV3.	
APT SPV2 ACN 095 483 453	Ownership of APA share of SeaGas pipeline.	Seagas pipeline (uncovered)
APT SPV3 ACN 095 483 462		
Asset Management		
APT AM Employment Pty Limited ACN 124 754 356	Asset management company.	
APT AM Holdings Pty Limited ACN 124 754 383	Holding Company for APT O&M Holdings Pty Limited and APT Water Management Holdings Pty Limited.	
APT AM (Stratus) Pty Limited ACN 124 754 374	Asset management company.	
APT Facility Management Pty Limited ACN 124 754 365	Asset management company for Cogeneration and NGV assets.	
APT (MIT) Services Limited ACN 117 635 677	Corporate and Management Services Business for the Mariner Infrastructure Trust.	
APT O&M Holdings Pty Limited ACN 109 740 749	Holding company for Operations and Management business.	
APT O&M Services Pty Limited ACN 112 358 586	Operations and Management business.	
APT O&M Services (Qld) Pty Limited ACN 112 358 595	Operations and Management business.	

Name of Each Associate	Business Carried On	Regulated Assets Owned
APT Water Management Holdings Pty Limited ACN 109 043 496	Owns 100% of APT Water Management Pty Limited	
APT Water Management Pty Limited ACN 105 097 434	Water management business	