

18 July 2012

Mr Warwick Anderson
General Manager
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

Dear Mr Anderson

RE: Comments on Roma to Brisbane Pipeline queuing requirements

Thank you for the opportunity to comment on the Australian Energy Regulator's (AER) updated positions on the Roma to Brisbane Pipeline (RBP) queuing requirements circulated on Monday 16 July.

As previously advised Stanwell Corporation Limited (Stanwell) is owner and operator of Swanbank E gas-fired Power Station and is a major gas user utilising capacity on the RBP.

Stanwell is reasonably comfortable with the latest changes put forward by the AER. In particular, Stanwell is pleased that a number of changes relating to the deposit payable if an offer for capacity is made available have been included. Specifically:

APTPL will notify the user that it is required to pay one of the following relevant deposits:

- If the capacity is available more than two years after the offer—deposit of two per cent of a year's capacity sought
- If the capacity is available two years or less after the offer—deposit of five per cent of a year's capacity sought
- A user has paid the two per cent deposit above, time passes and the capacity will now be available two years or less after the original offer—further deposit of three per cent of a year's capacity sought.

These reach a reasonable balance between ensuring participants are genuine in their interests and unnecessarily tying up capital.

We also note the AER has recommended the following timeframes should apply to paying the deposit.

A user has twenty business days to pay the relevant deposit, after it accepts an offer and from when it receives notification to pay. This period may be extended by APTPL.

While we are comfortable with the proposed timeframes, we note there is no explicit mechanism for users to approach APTPL to discuss alternative arrangements if

necessary. Rather it only discusses the position of APTPPL in this situation. On this basis we suggest the following amendment.

A user has twenty business days to pay the relevant deposit, after it accepts an offer and from when it receives notification to pay. APTPPL are required to consider any reasonable alternative timeframes put forward by a user and if agreed extend the timeframe for paying the deposit accordingly.

We appreciate the opportunity to raise these issues and welcome further discussing these points with you directly at a convenient time. Please direct any questions to Mr John Burrows, Gas Resources Manager on (07) 3335 7204.

Yours sincerely

A handwritten signature in black ink, appearing to read 'T. Mills'.

Tanya Mills
General Manager Portfolio Trading