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24 August 2004

Mike Buckley
General Manager
Regulatory Affairs Group - Gas
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602



Dear Mr Buckley

2003/04 Ring Fencing Report for the Queensland Gas Pipeline

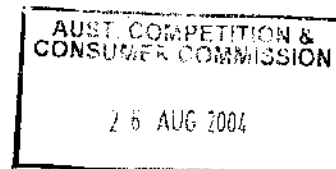
Please find attached the 30 June 2004 Ring Fencing Compliance Reports for the Queensland Gas Pipeline. As required by the Australian Competition and Consumer Commission, the Board of Directors of the following Service Providers have approved the attached reports:

Alinta DEQP Pty Ltd
Alinta DQP Pty Ltd
Alinta DAO Pty Ltd

Should you have any queries with respect to this matter I can be contacted on (03) 9685 1061.

Yours sincerely

Stephen Livens
Manager, Government and Regulatory Affairs



Statement of Compliance

Queensland Gas Pipeline

Statement of Compliance for Alinta DAO Pty Ltd for the financial year 2003/04


1. Attached is the annual Ring Fencing Compliance Report for the year ending 30 June 2004.
2. Alinta DAO Pty Ltd 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. Alinta DAO Pty Ltd 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 Chief Executive Officer of Alinta DAO Pty Ltd 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;
 - (e) the compliance program is reviewed regularly and as necessary.
4. The Board of Directors of Alinta DAO Pty Ltd has approved this report.

Signed by:



Robert Browning
Chief Executive Officer
Alinta DAO Pty Ltd

Date: 18/8/04



Murray King
Director
Alinta DAO Pty Ltd

Date: 18 August 2004

Ring Fencing Compliance Report

Queensland Gas Pipeline

Ring Fencing Compliance Report for Alinta DAO Pty Ltd - 2003/04

Compliance with minimum ring fencing obligations

Alinta DAO Pty Ltd 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.

Alinta DAO Pty Ltd will, pursuant to section 4.14 of the Code, notify the Commission immediately on becoming aware of a breach (or potential breach) of its obligations under section 4 of the Code.

1. Service Provider is a legal entity

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

Alinta DAO Pty Ltd (ACN 083 050 319) undertakes the marketing and operating activities of the Queensland Gas Pipeline. Alinta DAO Pty Ltd is a legal entity registered under the Corporations Law.

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).

The Alinta Ltd group of companies provides comprehensive integrated wholesale and retail energy services to the market. Alinta's company structure ensures that certain activities are strictly quarantined. The responsibility for managing wholesale gas sales in south east Australia lies with a separate legal entity Alinta EATM Pty Ltd (Alinta EATM - ACN 083 050 168), while gas sales in Western Australia is undertaken by Alinta Sales Pty Ltd (ACN 089 531 984). As such, Alinta DAO Pty Ltd is not involved in the business of producing, purchasing or selling natural gas as prescribed by the Code.

The table below identifies all the Alinta DAO Pty Ltd Associates with any involvement in natural gas:

Entity	Business carried on	Assets owned
Alinta DEQP Pty Ltd (formerly DEI Queensland Pipeline Pty Ltd)	Transmission	25% of Queensland Gas Pipeline
Alinta DQP Pty Ltd (formerly Duke Queensland Pipeline Pty Ltd)	Transmission	75% of Queensland Gas Pipeline

Alinta DENSUGH Pty Ltd (formerly Duke Energy NSW Gas Holdings Pty Ltd)	Holding company	Holding company of Alinta DEGP Pty Ltd and Alinta DEEGP Pty Ltd.
Alinta DTH Pty Ltd (formerly DEI Tasmania Holdings Pty Ltd)	Transmission	Tasmanian Gas Pipeline
Alinta EH Pty Ltd (formerly Duke Energy Australian Holdings Pty Ltd)	Holding company	Holding company of Alinta DAO Pty Ltd, Alinta DQP Pty Ltd Pty Ltd, Alinta DAO Pty Ltd, Alinta EA Pty Ltd, Alinta EAC Pty Ltd, and Alinta EATM Pty Ltd (85.487% interest).
Alinta DVH Pty Ltd (formerly DEI Vic Hub Pty Ltd)	Trading hub	Vic Hub
Alinta EATM Pty Ltd (Duke Energy Australia Trading and Marketing Pty Ltd)	Trading and marketing	N/A
Alinta EAC Pty Ltd (formerly Duke Energy Australia Commodities Pty Ltd)	Holding company	14.513% owner of Alinta EATM Pty Ltd
Alinta EA Pty Ltd (formerly Duke Energy Australia Pty Ltd)	Administration	N/A
Alinta DEGP Pty Ltd (formerly DEI Eastern Gas Pipeline Pty Ltd)	Transmission	50% interest in the Eastern Gas Pipeline
Alinta DEEGP Pty Ltd (formerly Duke Eastern Gas Pipeline Pty Ltd)	Transmission	50% interest in the Eastern Gas Pipeline
Alinta DEWAI Pty Ltd (formerly Duke Energy WA Holdings Pty Ltd)	Holding company	Holding company of Alinta DEWAP Pty Ltd and 1% interest in the Port Headland and Newman Power Stations.
Alinta DEWAP Pty Ltd (formerly Duke Energy WA Power Pty Ltd)	Transmission	11.843% interest in the Goldfield Gas Transmission Pipeline and 99% interest in the Port Headland and Newman Power Stations.
AlintaGas Networks Pty Ltd	Distribution	Alinta Ltd has a 74.1% interest in AlintaGas Networks Pty Ltd.
Alinta Sales Pty Ltd	Gas supply and sales in Western Australia.	Wholly owned subsidiary of Alinta Ltd.
Multinet Group Holdings Ltd	Distribution	Alinta Ltd has a 20.1% interest in Multinet Group Holdings Pty Ltd.

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.

A separate set of accounts is established and maintained in respect of the services of the Queensland Gas Pipeline.

A consolidated set of accounts is prepared in respect of the entire business of Alinta DAO Pty Ltd.

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.

Within the Alinta Energy Holdings Pty Ltd group of companies shared costs were allocated according to the Corporate Overhead Allocation Policy of the former Duke Energy International, up to 23 April 2004. The period between the date of acquisition and the 30 June 2004 was covered by the allocation policy of Alinta Energy Holdings Pty Ltd, which is consistent with the principles in Section 8.1 of the Code. This policy seeks to provide a consistent basis for allocating shared costs using a combination of factors including earnings, staff numbers and business complexity.

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.

During the 2003/04 period Alinta DAO Pty Ltd undertook the marketing and operation activities of the Queensland Gas Pipeline.

All confidential information received by the Alinta DAO Pty Ltd was strictly controlled in a manner consistent with the Code requirements. All marketing staff were employed by Alinta DAO Pty Ltd and were located remotely from Associates who work for a Related Business.

With respect to electronic information, computer security protocols were established to ensure that only Alinta DAO Pty Ltd marketing staff were able to access such information. Any paper copies of confidential information are kept separately by relevant marketing staff

in secure storage facilities. Further, all employees are required to sign confidentiality agreements on commencement of duties. These procedures are monitored on a day to day basis through on going training and awareness processes.

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'.

Alinta DAO Pty Ltd is committed to ensuring that it does not in any way employ marketing staff of an associate, nor does it allow its marketing staff to work for an associate involved in a related business as prescribed by the Code. Should this inadvertently occur, Alinta DAO Pty Ltd is committed to removing such staff from their position.

The procedures adopted during the relevant period to ensure compliance with sections 4.1(h) and (i) include requiring that all marketing staff are employed by Alinta DAO Pty Ltd.

Statement of Compliance

Queensland Gas Pipeline

Statement of Compliance for Alinta DEQP Pty Ltd for the financial year 2003/04


1. Attached is the annual Ring Fencing Compliance Report for the year ending 30 June 2004.
2. Alinta DEQP Pty Ltd 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. Alinta DEQP Pty Ltd 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 Chief Executive Officer of Alinta DEQP Pty Ltd 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;
 - (e) the compliance program is reviewed regularly and as necessary.
4. The Board of Directors of Alinta DEQP Pty Ltd has approved this report.

Signed by:



Bob Browning
Chief Executive Officer
Alinta DEQP Pty Ltd

Date: 18/8/04



Murray King
Director
Alinta DEQP Pty Ltd

Date: 18 August 2004

Ring Fencing Compliance Report
Queensland Gas Pipeline
Ring Fencing Compliance Report for Alinta DEQP Pty Ltd -
2003/04

Compliance with minimum ring fencing obligations

Alinta DEQP Pty Ltd 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.

Alinta DEQP Pty Ltd will, pursuant to section 4.14 of the Code, notify the Commission immediately on becoming aware of a breach (or potential breach) of its obligations under section 4 of the Code.

1. Service Provider is a legal entity

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

Alinta DEQP Pty Ltd (ACN 083 050 104) is the legal and beneficial owner of 25% of the Queensland Gas Pipeline via the Queensland Pipeline Partnership with Alinta DQP Pty Ltd. Alinta DEQP Pty Ltd is a legal entity registered under the Corporations Law.

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).

The Alinta Ltd group of companies provides comprehensive integrated wholesale and retail energy services to the market. Alinta's company structure ensures that certain activities are strictly quarantined. The responsibility for managing wholesale gas sales in south east Australia lies with a separate legal entity Alinta EATM Pty Ltd (Alinta EATM - ACN 083 050 168), while gas sales in Western Australia is undertaken by Alinta Sales Pty Ltd (ACN 089 531 984). As such, Alinta DEQP Pty Ltd is not involved in the business of producing, purchasing or selling natural gas as prescribed by the Code.

The table below identifies all the Alinta DEQP Pty Ltd Associates with any involvement in natural gas:

Entity	Business carried on	Assets owned
Alinta DAO Pty Ltd	Pipeline and power station operator	N/A
Alinta DQP Pty Ltd (formerly Duke Queensland Pipeline Pty Ltd)	Transmission	75% of Queensland Gas Pipeline

Alinta DENSWGH Pty Ltd (formerly Duke Energy NSW Gas Holdings Pty Ltd)	Holding company	Holding company of Alinta DEGP Pty Ltd and Alinta DEEGP Pty Ltd.
Alinta DTH Pty Ltd (formerly DEI Tasmania Holdings Pty Ltd)	Transmission	Tasmanian Gas Pipeline
Alinta EH Pty Ltd (formerly Duke Energy Australian Holdings Pty Ltd)	Holding company	Holding company of Alinta DEQP Pty Ltd, Alinta DQP Pty Ltd Pty Ltd, Alinta DAO Pty Ltd, Alinta EA Pty Ltd, Alinta EAC Pty Ltd, and Alinta EATM Pty Ltd (85.487% interest).
Alinta DVH Pty Ltd (formerly DEI Vic Hub Pty Ltd)	Trading hub	Vic Hub
Alinta EATM Pty Ltd (Duke Energy Australia Trading and Marketing Pty Ltd)	Trading and marketing	N/A
Alinta EAC Pty Ltd (formerly Duke Energy Australia Commodities Pty Ltd)	Holding company	14.513% owner of Alinta EATM Pty Ltd
Alinta EA Pty Ltd (formerly Duke Energy Australia Pty Ltd)	Administration	N/A
Alinta DEGP Pty Ltd (formerly DEI Eastern Gas Pipeline Pty Ltd)	Transmission	50% interest in the Eastern Gas Pipeline
Alinta DEEGP Pty Ltd (formerly Duke Eastern Gas Pipeline Pty Ltd)	Transmission	50% interest in the Eastern Gas Pipeline
Alinta DEWAH Pty Ltd (formerly Duke Energy WA Holdings Pty Ltd)	Holding company	Holding company of Alinta DEWAP Pty Ltd and 1% interest in the Port Headland and Newman Power Stations.
Alinta DEWAP Pty Ltd (formerly Duke Energy WA Power Pty Ltd)	Transmission	11.843% interest in the Goldfield Gas Transmission Pipeline and 99% interest in the Port Headland and Newman Power Stations.
AlintaGas Networks Pty Ltd	Distribution	Alinta Ltd has a 74.1% interest in AlintaGas Networks Pty Ltd.
Alinta Sales Pty Ltd	Gas supply and sales in Western Australia.	Wholly owned subsidiary of Alinta Ltd.
Multinet Group Holdings Ltd	Distribution	Alinta Ltd has a 20.1% interest in Multinet Group Holdings Pty Ltd.

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.

A separate set of accounts is established and maintained in respect of the services of the Queensland Gas Pipeline.

A consolidated set of accounts is prepared which identifies Alinta DEQP Pty Ltd's 25% ownership of the Queensland Gas Pipeline.

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.

Within the Alinta Energy Holdings Pty Ltd group of companies shared costs were allocated according to the Corporate Overhead Allocation Policy of the former Duke Energy International, up to 23 April 2004. The period between the date of acquisition and the 30 June 2004 was covered by the allocation policy of Alinta Energy Holdings Pty Ltd, which is consistent with the principles in Section 8.1 of the Code. This policy seeks to provide a consistent basis for allocating shared costs using a combination of factors including earnings, staff numbers and business complexity.

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.

During the 2003/04 period Alinta DAO Pty Ltd undertook the marketing and operation activities of the Queensland Gas Pipeline.

All confidential information received by the Alinta DAO Pty Ltd was strictly controlled in a manner consistent with the Code requirements. All marketing staff were employed by Alinta DAO Pty Ltd and were located remotely from Associates who work for a Related Business.

With respect to electronic information, computer security protocols were established to ensure that only Alinta DAO Pty Ltd marketing staff were able to access such information. Any paper copies of confidential information are kept separately by relevant marketing staff

in secure storage facilities. Further, all employees are required to sign confidentiality agreements on commencement of duties. These procedures are monitored on a day to day basis through on going training and awareness processes.

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'.

Alinta DEQP Pty Ltd is a holding company for 25% of the QGP. It does not have any employees. During the 2003/04 period, Alinta DAO Pty Ltd undertook the marketing and operating activities of the Queensland Gas Pipeline.

Alinta DAO Pty Ltd is committed to ensuring that it does not in any way employ marketing staff of an associate, nor does it allow its marketing staff to work for an associate involved in a related business as prescribed by the Code. Should this inadvertently occur, Alinta DAO Pty Ltd is committed to removing such staff from their position.

The procedures adopted during the relevant period to ensure compliance with sections 4.1(h) and (i) include requiring that all marketing staff are employed by Alinta DAO Pty Ltd.

Statement of Compliance

Queensland Gas Pipeline

Statement of Compliance for Alinta DQP Pty Ltd for the financial year 2003/04

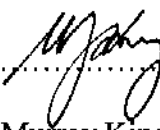
1. Attached is the annual Ring Fencing Compliance Report for the year ending 30 June 2004.
2. Alinta DQP Pty Ltd is not aware of any breach of any of the obligations listed in section 4.1 of the Code other than as detailed in this report.
3. Alinta DQP Pty Ltd has maintained a compliance program during 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 Chief Executive Officer of Alinta DQP Pty Ltd 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;
 - (e) the compliance program is reviewed regularly and as necessary.
4. The Board of Directors of Alinta DQP Pty Ltd has approved this report.

Signed by:



Robert Browning
Chief Executive Officer
Alinta DQP Pty Ltd

Date: 18/8/04



Murray King
Director
Alinta DQP Pty Ltd

Date: 18 August 2004

Ring Fencing Compliance Report
Queensland Gas Pipeline
Ring Fencing Compliance Report for Alinta DQP Pty Ltd -
2003/04

Compliance with minimum ring fencing obligations

Alinta DQP Pty Ltd 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.

Alinta DQP Pty Ltd will, pursuant to section 4.14 of the Code, notify the Commission immediately on becoming aware of a breach (or potential breach) of its obligations under section 4 of the Code.

1. Service Provider is a legal entity

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

Alinta DQP Pty Ltd (ACN 083 050 284) is the legal and beneficial owner of 75% of the Queensland Gas Pipeline via the Queensland Pipeline Partnership with Alinta DEQP Pty Ltd. Alinta DQP Pty Ltd is a legal entity registered under the Corporations Law.

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).

The Alinta Ltd group of companies provides comprehensive integrated wholesale and retail energy services to the market. Alinta's company structure ensures that certain activities are strictly quarantined. The responsibility for managing wholesale gas sales in south east Australia lies with a separate legal entity Alinta EATM Pty Ltd (Alinta EATM - ACN 083 050 168), while gas sales in Western Australia is undertaken by Alinta Sales Pty Ltd (ACN 089 531 984). As such, Alinta DQP Pty Ltd is not involved in the business of producing, purchasing or selling natural gas as prescribed by the Code.

The table below identifies all the Alinta DQP Pty Ltd Associates with any involvement in natural gas:

Entity	Business carried on	Assets owned
Alinta DAO Pty Ltd	Pipeline and power station operator	N/A
Alinta DEQP Pty Ltd (formerly Duke Queensland Pipeline Pty Ltd)	Transmission	75% of Queensland Gas Pipeline

Alinta DENSWGH Pty Ltd (formerly Duke Energy NSW Gas Holdings Pty Ltd)	Holding company	Holding company of Alinta DEGP Pty Ltd and Alinta DEEGP Pty Ltd.
Alinta DTII Pty Ltd (formerly DEI Tasmania Holdings Pty Ltd)	Transmission	Tasmanian Gas Pipeline
Alinta EH Pty Ltd (formerly Duke Energy Australian Holdings Pty Ltd)	Holding company	Holding company of Alinta DQP Pty Ltd, Alinta DQP Pty Ltd Pty Ltd, Alinta DAO Pty Ltd, Alinta EA Pty Ltd, Alinta EAC Pty Ltd, and Alinta EATM Pty Ltd (85.487% interest).
Alinta DVH Pty Ltd (formerly DEI Vic Hub Pty Ltd)	Trading hub	Vic Hub
Alinta EATM Pty Ltd (Duke Energy Australia Trading and Marketing Pty Ltd)	Trading and marketing	N/A
Alinta EAC Pty Ltd (formerly Duke Energy Australia Commodities Pty Ltd)	Holding company	14.513% owner of Alinta EATM Pty Ltd
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Alinta DEGP Pty Ltd (formerly DEI Eastern Gas Pipeline Pty Ltd)	Transmission	50% interest in the Eastern Gas Pipeline
Alinta DEEGP Pty Ltd (formerly Duke Eastern Gas Pipeline Pty Ltd)	Transmission	50% interest in the Eastern Gas Pipeline
Alinta DEWAH Pty Ltd (formerly Duke Energy WA Holdings Pty Ltd)	Holding company	Holding company of Alinta DEWAP Pty Ltd and 1% interest in the Port Headland and Newman Power Stations.
Alinta DEWAP Pty Ltd (formerly Duke Energy WA Power Pty Ltd)	Transmission	11.843% interest in the Goldfield Gas Transmission Pipeline and 99% interest in the Port Headland and Newman Power Stations.
AlintaGas Networks Pty Ltd	Distribution	Alinta Ltd has a 74.1% interest in AlintaGas Networks Pty Ltd.
Alinta Sales Pty Ltd	Gas supply and sales in Western Australia.	Wholly owned subsidiary of Alinta Ltd.
Multinet Group Holdings Ltd	Distribution	Alinta Ltd has a 20.1% interest in Multinet Group Holdings Pty Ltd.

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.

A separate set of accounts is established and maintained in respect of the services of the Queensland Gas Pipeline.

A consolidated set of accounts is prepared which identifies Alinta DQP Pty Ltd's 75% ownership of the Queensland Gas Pipeline.

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.

Within the Alinta Energy Holdings Pty Ltd group of companies shared costs were allocated according to the Corporate Overhead Allocation Policy of the former Duke Energy International, up to 23 April 2004. The period between the date of acquisition and the 30 June 2004 was covered by the allocation policy of Alinta Energy Holdings Pty Ltd, which is consistent with the principles in Section 8.1 of the Code. This policy seeks to provide a consistent basis for allocating shared costs using a combination of factors including earnings, staff numbers and business complexity.

5. Treatment of Confidential Information

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- *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.

During the 2003/04 period Alinta DAO Pty Ltd undertook the marketing and operation activities of the Queensland Gas Pipeline.

All confidential information received by the Alinta DAO Pty Ltd was strictly controlled in a manner consistent with the Code requirements. All marketing staff were employed by Alinta DAO Pty Ltd and were located remotely from Associates who work for a Related Business.

With respect to electronic information, computer security protocols were established to ensure that only Alinta DAO Pty Ltd marketing staff were able to access such information. Any paper copies of confidential information are kept separately by relevant marketing staff

in secure storage facilities. Further, all employees are required to sign confidentiality agreements on commencement of duties. These procedures are monitored on a day to day basis through on going training and awareness processes.

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'.

Alinta DQP Pty Ltd is a holding company for 75% of the QGP. It does not have any employees. During the 2003/04 period, Alinta DAO Pty Ltd undertook the marketing and operating activities of the Queensland Gas Pipeline.

Alinta DAO Pty Ltd is committed to ensuring that it does not in any way employ marketing staff of an associate, nor does it allow its marketing staff to work for an associate involved in a related business as prescribed by the Code. Should this inadvertently occur, Alinta DAO Pty Ltd is committed to removing such staff from their position.

The procedures adopted during the relevant period to ensure compliance with sections 4.1(h) and (i) include requiring that all marketing staff are employed by Alinta DAO Pty Ltd.