

Ms Kanwaljit Kaur
General Manager
Regulatory Affairs – Gas
Australian Competition & Consumer Commission
PO Box 1199
Dickson ACT 2602
(Fax: 02-6243-1199)

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Dear Kanwaljit

Victorian Gas Transmission Access Arrangements – Information Provision

I am writing to you about the applications by GasNet and VENCORP in relation to the above, which are currently under review by the Commission.

The Energy Users Association of Australia (EUAA) places considerable emphasis on the need for access reviews to be well informed, with all relevant information put into the public domain. In the case of monopolies, we hold the view that there should be a high onus on the access provider to make all information public, unless they can demonstrate that there are justifiable reasons why it should not be disclosed. For monopolies, we would see confidentiality as being justifiable only in rare cases. We also hold a view that there should be an onus on monopoly access providers and regulators to ensure that information is relevant and that interested parties can make effective use of it.

The current regulatory arrangements on information provision in gas fall somewhat short of these goals, but nevertheless they do provide some useful powers on information provision.

We are aware of the information that has been provided to the Commission in relation to the above review by the access providers. We also acknowledge and welcome GasNet's decision to make public Annexures 2-6 to its submission, a decision that has already improved the information disclosed in this review.

Nevertheless, our membership seeks an assurance that the Commission is satisfied about the adequacy of the information provided by GasNet and VENCORP, particularly in relation to sections 2.6 and 2.7 of the Gas Code, pursuant to section 2.9 (a). We believe this is important in terms of access providers knowing what is required of them under the gas access regime, the Commission receiving informed input from interested parties, including users, and there being a well-informed decision on this matter by the Commission.

We also seek additional comment from the Commission in relation to the remaining three annexures where confidentiality is claimed, namely:

- Annexure 7: Valuation of Non-Insurance Risks prepared by Trowbridge;

- Annexure 8: CSIRO Report – Projected Changes in Temperature and heating degree days for Melbourne, 2003-2007; and
- Annexure 9: Comparative Performance Benchmarks for Natural Gas Pipeline Industry prepared by Cap Gemini.

In particular, that the Commission is satisfied the information contained therein is commercially sensitive as claimed.

I look forward to your response.

Yours sincerely,

[original signed]

Roman Domanski
Executive Director