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Mr Michael Walsh Director Network Regulation North Branch Australian Competition and Consumer Commission GPO Box 3648 Sydney NSW 2001

Dear Michael

Re: Dawson Valley Pipeline – Draft Decision

Multinet appreciates the opportunity to respond to the ACCC on issues arising from the Draft Decision for the Dawson Valley Pipeline (DVP). Multinet is currently undergoing a regulatory review for its Victorian gas networks. As part of this review, Multinet has been the recipient of significant new research, prepared by NERA, concerning the estimation of the rate of return that is also relevant to the DVP Access Arrangement review. Multinet is concerned that the issues that it (and the other Victorian gas distribution businesses) is raising in its Access Arrangement review, are very significant and require a broader consideration.

Multinet fully supports NERA's conclusions and submits it to the ACCC to consider in the Dawson Valley Pipeline Access Arrangement review, but also recommends that broader consideration be given for application to other infrastructure it regulates.

Yours Sincerely

Hugh Gleeson Chief Executive Officer