

Mr Chris Pattas
General Manager
Network Regulation South Branch
Australian Energy Regulator
GPO Box 520
Melbourne **VIC** 3001

Email: aeringuiry@aer.gov.au

19 February 2009

APA GasNet Access Arrangement variation Proposal

Dear Chris,

AGL refers to the access arrangement variation proposal by APA GasNet lodged on 18 December 2008.

In brief, the variation proposal deals with a very localised issued and calls for:

- removing the WUGS Transmission Refill Tariff;
- applying the standard withdrawal tariff for the South West Zone (projected to be \$0.1414/GJ in 2009) to all withdrawals at WUGS, irrespective of whether the gas is exported via the SEA Gas Pipeline or reinjected into the PTS;
- removing the Cross System Withdrawal Tariff for all withdrawals from the Port Campbell Injection Zone

AGL wholeheartedly supports GasNet's proposal as it would appear to be eminently sensible and fair. It will have the primary benefit of removing an

Being selected as a member of the Dow Jones Sustainability Index 2006/07

Gaining accreditation under the National GreenPower Accreditation Program for AGL Green Energy®, AGL Green Living® and AGL Green Spirit



existing tariff anomaly whereby shippers using the WUGS connection point are able to export gas to South Australia without paying the standard withdrawal tariffs faced by other shippers exporting gas via the SEA Gas connection point. It has the benefit of delivering efficient tariffs (non-distortionary) whilst at the same time ensuring that lower prices are delivered. Those parties who have entered into long-term contracts on the expectation of the previous tariff arrangements are not financially disadvantaged.

Should you have any queries, please contact George Foley on ph: 03 8633 6239.

Yours sincerely

Elizabeth Molyneux

General Manager Energy Regulation

Gaining accreditation under the National GreenPower Accreditation Program for AGL Green Energy®, AGL Green Living® and AGL Green Spirit