

Office of the Chief Executive Officer
Victorian Energy Networks Corporation
Level 2 Yarra Tower
World Trade Centre
Siddeley Street
Melbourne Vic 3055
Telephone (03) 8664 6500
Facsimile (03) 8664 6510

13 May 2002

Ms Kanwaljit Kaur General Manager Regulatory Affairs – Gas Australian Competition and Consumer Commission PO Box 1199 Dickson ACT 2602

Dear Kanwaljit

Applications for revision of VENCorp and GasNet Access Arrangements

I refer to the Commission's Issues Paper dated 19 April 2002 in relation to applications for revision lodged by GasNet Australia (Operations) Pty Ltd and VENCorp, and now attach VENCorp's submission in response.

Our response addresses the following issues:

- 1 GasNet Services, Terms and Conditions for Services
- 2 Prudent Discounts
- 3 Cost allocation
- 4 GasNet reference tariffs
- 5 Pass through events
- 6 Extensions and expansions
- 7 Key Performance Indicators
- 8 Comparison of VENCorp/GasNet Demand Forecasts
- 9 Approval and reporting process
- 10 Other matters

Also attached is a copy of legal advice from Corrs Chambers Westgarth referred to in our response.

Please do not hesitate to contact either Terry Grimwade (ph. 03 8664 6610) or Craig Price (ph. 03 8664 6614), should you require clarification on any of the matters raised.

Yours sincerely

Matt Zema

Chief Executive Officer

Att.