



10 March 2023

Mr. Tyson Self
Economic Regulation Authority

Lodged via ERA portal: www.erawa.com.au/consultation

Dear Mr. Self

ERA public notice Reference service proposal for the Goldfields Gas Pipeline

GGT is responding to ERA's public notice *Reference service proposal for the Goldfields Gas Pipeline, Invitation for public submissions*, dated 10 February 2023. We refer to matters identified in the ERA public notice regarding additional pipeline and reference services.

We note that the ERA has sought feedback on whether there are any other pipeline services that GGT can reasonably provide on the Goldfields Gas Pipeline and whether any of these services should be specified as reference services in the access arrangement. Further, the ERA considered that it is reasonable to consider future pipeline services that could reasonably be provided once the pipeline is interconnected with the Northern Goldfields Interconnect, citing "backhaul" as a potential service.

GGT wishes to clarify that a service that aligns with the a backhaul service is already provided for within the proposed definition of transportation service.

Pipeline transportation services

In accordance with National Gas Rule 47A(2), GGT's reference service proposal distinguishes between services provided on the pipeline by:

1. Type of service
2. Priority of service, and
3. Receipt and delivery points relevant to the service.

In doing so, GGT identifies two transportation service types of differing priorities potentially available on the pipeline. These are the Firm and Interruptible transportation services. Firm transportation services have the highest priority on the pipeline, whereas Interruptible services have a lower priority. There are no other service priorities available.

GGT further describes these transportation services as being available between any receipt and any delivery point. In doing so, the transportation services offered are agnostic of service direction. That is, regardless of whether the transportation service is offered with or against the prevailing flow of gas on the pipeline, APA potentially offers Firm and Interruptible transportation services.

In GGT's service framework described above, a backhaul service, as commonly understood in respect of gas transportation services, is not a different or additional service to those already proposed. GGT's view is that there is no need to refer to a specific backhaul service as, from our service structure/ contract arrangements, they are identical to a transportation service. As such, backhaul is already incorporated in the proposed definition of transportation service in our reference service proposal.

GGT offers firm transportation service on the GGP as this is a service that is sought by a significant portion of the market, and GGT considers that it satisfies the reference service factors.

GGT considers the same principles apply for services offered from the NGI receipt point, for deliveries to any delivery point north or south of that point.

As set out in GGT's reference service proposal, firm transportation service is the only service, that can be reasonably provided, that meets the reference service factors as set out in National Gas Rule 47A(15). Backhaul is already incorporated in the proposed definition of firm transportation service.

GGT would appreciate the opportunity to discuss this matter with the ERA. Please contact Nives Matosin, Manager Regulatory at nives.matosin@apa.com.au for any further clarification.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

Aidan Trend
General Manager
Goldfields Gas Transmission