10 February 2000

Mr Luke Berry National Competition Council GPO Box 250B MELBOURNE VIC 3001

Dear Mr Berry

Coverage of the Eastern Gas Pipeline

I refer to the Council's Issues Paper of January 2000 which sought submissions on the coverage of the Eastern Gas Pipeline (EGP) to help it determine what recommendation to make to the relevant Minister concerning coverage.

East Australian Pipeline Limited (EAPL) acquired the Moomba to Sydney Pipeline system (MSP) from the Federal Government in 1994. Originally commissioned in 1976 to supply gas to Sydney the system has been extended to service much of regional NSW and the ACT (refer map attached). More recently EAPL has invested in the construction of the Interconnect Pipeline between NSW and Victoria. With this investment and other initiatives EAPL believes that it is assisting in inter-basin gas on gas competition in NSW, the ACT and Victoria and the development of an increasingly competitive marketplace.

As a new pipeline to supply the same markets served by the MSP, the construction of the EGP is of major significance to EAPL. In the limited time since the announcement of the application for coverage of the EGP, EAPL has formed the view that:

- Pipelines servicing the same market should receive equal treatment; and
- if there is competition between pipelines then coverage may be unneccessary.

This issue clearly raises some complex issues that cannot possibly be adequately addressed by EAPL in the timeframe currently set by the Council.

By this letter EAPL requests that the Council extend the period for receiving submissions from 11 February to at least 31 March to allow EAPL time to fully develop its position on the coverage of the EGP and provide an informed submission to the Council.

Yours sincerely

STEPHEN OHL General Manager, EAPL

