

7 May 2009

Mr John Hall
Chief Executive
Queensland Competition Authority
GPO Box 2257
BRISBANE QLD 4001

Dear Mr Hall

The Queensland Resources Council (QRC) appreciates the opportunity to respond to the Authority's request for comments on QR Network's proposal to extend the expiry date of the current access undertaking from 30 June 2009 to 31 December 2009.

QRC endorses QR Network's proposed amendments to the current 2008 Access Undertaking – the proposed amendments are minor and consistent with past practice to address timing delays between the expiry and subsequent approval of QR Network's access undertaking.

With respect to the policy issues raised in QR Network's submission, specifically the retrospective recovery of approved regulated revenues (relating to reference tariffs and annual revenue requirements) and the setting of time variant cost of capital parameters, QRC considers that a consistent and transparent treatment of these matters is essential to ensure regulatory certainty.

Industry's strong preference is for these policy matters to be considered in close consultation with QRC to ensure that outcomes are not subject to any claims of actual or perceived gaming – there are strong arguments for regulatory certainty to be provided to both QR Network and its customers in relation to these matters.

Should you wish to discuss any of the issues raised in this submission, please do not hesitate to contact Russell Silver-Thomas, Adviser – Industry Policy, on (07) 3295 9560.

Yours sincerely



Michael Roche
Chief Executive