QUEENSLAND
resources
COUNCIL

16 November 2009

Mr John Hall
Chief Executive
Queensland Competition Authority
BRISBANE QLD 4001

Dear Mr Hall

The Queensland Resources Council (QRC) provides this response to the Authority's request for comments on QR Network's proposal to further extend the expiry date of the current access undertaking from 31 December 2009 to 31 May 2010.

QR Network's proposed amendments are consistent with past practice (reflecting those recently approved by the Authority on 21 May 2009) to address timing delays between the expiry and subsequent approval of QR Network's access undertaking.

Consistent with QRC's previous submission on extending expiry date of the current Access Undertaking (dated 7 May 2009), industry reiterates the importance of a consistent and transparent treatment of 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 to provide regulatory certainty.

Industry's strong preference remains for these policy matters to be considered in close consultation with QRC to ensure regulatory certainty for both QR Network and coal producers in relation to these matters. QRC notes that a timely draft decision by the Authority on QR Network's proposed replacement access undertaking will provide greater certainty regarding the abovementioned policy issues raised in QR Network's application.

QRC looks forward to reviewing the forthcoming draft decision by the Authority on QR's proposed replacement access undertaking, which will enable these related regulatory processes to be finalised in a timely manner.

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

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