



Ms Ann Jones
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Queensland Competition Authority
Level 27, 145 Ann Street
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Via submission process at www.qca.org.au

Aurizon Network – 2025 Review of System Rules – Aurizon Operations Feedback

10 October 2025

Dear Ann,

Aurizon Operations (**AO**) refers to the Queensland Competition Authority's (**QCA's**) invitation to comment on Aurizon Network's (**AN's**) review of the Central Queensland coal network (CQCN) System Rules 2025 (**System Rules**).

AO supports the proposal to:

1. embed the Rolling Plan into the System Rules;
2. encourage earlier cancellation by mines to improve redeployment of released paths (through the scheduling of Additional train services);
3. remove a disincentive for the utilisation of latent capacity after the Agreed ITP is published; and
4. clarify how schedule alterations may be made to the ITP.

AO considers these changes will improve the current System Rules and demonstrate that AN has listened to feedback from stakeholders since the last System Rules review.

By encouraging earlier cancellation and enabling more effective redeployment of released paths, these changes support better utilisation of available capacity ultimately contributing to greater system throughput.

Greater transparency of Model Solve

AN has responded to stakeholder requests for greater transparency around Week 1 Forecast and IRP model selection by amending clause 2.2 of the System Rules to state that '*.. the scenario selected ...will prioritise delivery of Access Holders' contracted TSEs with the objective of an equitable outcome maximising the utilisation of each coal system to meet contractual entitlements.*'

AN has also amended wording in the last dot point under the Rolling Daily IRP to confirm its ability to instruct operators to adjust demand to reflect system capability and manage optimisation processing time.

AO welcomes the increased transparency and considers that, where a network constraint is impacting capacity, AN should also provide commentary to stakeholders on the actions it takes to manage the schedule optimisation process.

AO appreciates AN's recognition of stakeholder interest in the model selection process. To further support stakeholder understanding of how selected models meet the criteria set out by AN, AO proposes that each model should be accompanied by simple metrics, at a supply chain level, around:

- throughput
- consists used
- dwell
- shortfall of demand at each tier level, and
- whether AN adjusted demand (i.e. in a constrained week).

Supply Chain stakeholders may also value an equity metric, given the overarching objective of equitable outcomes in the context of contractual entitlements and system capacity. While more complex, for each Origin<>Destination (O<>D) pair this could consider:

1. Shaped Contract Entitlement = System Availability x Contract Entitlements
2. Equitable Outcome Index = achieved services / (lesser of Shaped Contract Entitlement or orders)

These outcomes could be reported using average, minimum and maximum values across the modelling to provide a clear view of how equitable services were allocated.

We are pleased that AN has commenced engaging with operators on the development and publication of metrics for the model solve, and we would welcome the inclusion of these details in the System Rules once they are settled. It may also be beneficial at this time for AN to include references to supplementary materials, such as tiering methodology and tier forecasts, that AN provides on its Customer Portal to assist stakeholders manage their contractual entitlements.

Additional / future changes

AN has developed a DTP Portal to facilitate more efficient transmission of information between itself, operators and infrastructure service providers throughout the planning and scheduling process. The rules in clause 4.1 refer to Train Order alterations (Change Requests) being submitted electronically. This is done through the DTP Portal.

AO appreciates the productivity improvements this has brought and would welcome further efficiencies to minimise transaction time. For example, AO considers that some alterations should be able to be submitted in the Portal without a prior conversation with AN personnel. The type of alteration this exclusion might cover include 'simple' changes such as a service cancellation, traction change, origin change, or change to the port route allocation within known constraints. These are circumstances where operators should be able to decide for themselves whether a conversation is required before submitting a request in the DTP Portal. We think there are benefits for AN with this approach too as AN personnel would have more time to focus on higher value tasks. Ultimately, if a request was made through the DTP Portal without a prior conversation and AN determined that it was not a simple alteration, it could contact the party making the request.

Governance and Transition

AN has included a new sentence in clause 1.2 of the System Rules to enable it, between the annual System Rules Review, to vary the System Rules for the purpose of improving systems or processes. AN must act reasonably and must consult with stakeholders on these changes.

Given the significant reliance on systems for planning and scheduling coal services, and the need for seamless interaction between operators and AN systems, it's necessary for consultation to include a reasonable amount of time for stakeholders to work through the implications of any changes being considered. Where changes may impose additional costs on a party, or require significant resource commitments, this should be acknowledged and considered in the decision-making process. While such impacts may not preclude a change, they may necessitate reconsideration of timeframes and objectives.

Conclusion

AO greatly appreciates the engagement of AN on the 2025 changes to the System Rules. We are broadly in support of the changes and acknowledge the significant efforts AN has made to enhance scheduling and throughput outcomes for the CQCN supply chain.

Please do not hesitate to contact me if you have any questions.

Kind regards,

A handwritten signature in black ink, appearing to read 'L. Cottee'.

Lauren Cottee
Manager Commercial Development & Integration
Coal Customers
Aurizon Operations