



Professor Flavio Menezes  
Queensland Competition Authority  
GPO Box 2257  
Brisbane QLD 4001

## Queensland Rail's 2020 Draft Access Undertaking (DAU2) Collaborative Submission

27 September 2019

Dear Professor Menezes

Aurizon Coal, the coal haulage part of Aurizon's above rail transport business, welcomes the opportunity to work collaboratively with other coal haulage service providers in the relevant West Moreton and Metropolitan Systems (relevantly New Hope Group, Yancoal and Queensland Rail) in respect of the Queensland Rail 2020 Draft Amending Undertaking (**2020 DAU**).

Any submission regarding non-coal services in the West Moreton System will be made by Aurizon Bulk (Aurizon's non-coal above rail business) as a separate submission.

This letter is intended to demonstrate where Aurizon Coal is supportive of the collaborative DAU2 submission made by Queensland Rail, where there are misalignments to Queensland Rail's position and where further clarification is sought, as outlined in the table below:

**Table 1**

DAU2/SAA	Clause	Topic	Comment
DAU2	Clause 2.1.1	Access Applications	Support Queensland Rail proposed changes
DAU2	Clause 2.1.2	Preliminary Steps	Support Queensland Rail proposed changes
DAU2	Clauses 4.2 & 4.3	Operating Requirements Manual	Support Queensland Rail proposed changes
DAU2	Clause 6.1.4	Resolution of safety related disputes	Support except for the exclusion of a "best endeavours" obligation on Queensland Rail to reach agreement with the other parties as requested as part of the consultation process.

**Table 1 Continued**

DAU2/SAA	Clause	Topic	Comment
DAU2	New	Regional Network User Groups – productivity and operational improvement	Support Queensland Rail proposed changes
SAA	Clause 1.2, 1.3, 6.7(c), 8.8(b), 18.2(c) and Schedule 3 Clauses 2.2 and 5.4(a)	Good Faith	Support Queensland Rail proposed changes
SAA	Clause 1.3	Productivity and efficiency variations	Support Queensland Rail proposed changes
SAA	Schedule 1	Security amount	Request clarification on the drafting where the words “each of” have been added to:  “Security Amount for <u>each of</u> the Access Holder and the Operator which may be an amount in the range of zero to the sum of six months’ Access Charge, to be determine by Queensland Rail acting reasonably (having regard to the Access Holder or Operator’s financial capability)”

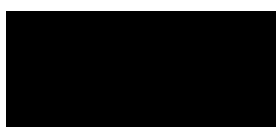
This submission is limited to Aurizon Coal’s response to Queensland Rail’s proposed amendments to the DAU2 in line with the Queensland Competition Authority’s (QCA’s) Draft Decision and collaborative process completed to date.

Aurizon Coal recognises that Queensland Rail has not distributed its final submission and so comments above relate solely to communications as part of the collaborative process and what is understood will be submitted. Aurizon Coal may have further comments upon reviewing the final submission.

Where Queensland Rail’s responses remain misaligned with Aurizon Coal’s submission dated 11 July 2019, the positions and comments raised by Aurizon Coal in this previous submission are maintained for the QCA’s consideration.

Should you have any questions in relation to the submission please contact me via phone on 0429 822 471 or email at [Hamish.Mulligan@aurizon.com.au](mailto:Hamish.Mulligan@aurizon.com.au).

Kind regards



Hamish Mulligan  
A/Manager Commercial Development & Integration  
Coal Customers