

5<sup>th</sup> April 2024

**Queensland Competition Authority  
(Submitted via QCA Online Submission Form)**

Thank you for the opportunity to comment on Aurizon Network's proposed amendments to the Central Queensland coal network (CQCN) system rules to provide for a trial of the daily rolling plan project.

We appreciate Aurizon Network's efforts to improve planning and scheduling processes, and the consultation undertaken throughout the development of this proposal. The QRC's Rail Working Group generally supports the amendments to system rules to accommodate the trial, subject to the comments below.

There remains significant uncertainty regarding a number of aspects of the trial. For example:

- The System Rules Consultation Report notes that:
  - o "Aurizon Network is in the process of finalising additional system-level reporting to demonstrate the impact of planning inputs and constraints through the IRP process to enable continuous improvement in supply chain performance"; and
  - o "Aurizon Network will monitor ordering behaviour throughout the Trial and consider implementing controls if required"; and
  - o "Further direct consultation with port operators is required and has been scheduled for the week commencing 11 March 2024".
- Section 1.2 of the proposed System Rules notes: "subsequent changes to the planning processes may be necessary throughout the Trial Period".

Given these uncertainties, and uncertainty of the outcome of the changes more generally, the RWG considers that the three-month period for the First Voting Date may prove to be too long in some circumstances. However, the three-month period may also prove to be suitable, if the trial is going well and the uncertainties are resolved. Therefore, our suggestion is not to amend the First Voting Date. Rather, the RWG suggests that End Users should have a right, similar to Aurizon Network's right under item 1.2, to call for a vote "at any other time".

The suggest amendments are:

- Amend the relevant section of Item 1.2 of the System Rules as follows: “and at any time during the Trial Period as determined by Aurizon Network or the Chair of the Rail Industry Group”.
- Add: The Chair of the Rail Industry Group will advise Aurizon Network that a vote is required only if a Majority of End Users have requested a vote. The Majority of End Users will be as defined in the undertaking and based on item (b) of the definition (i.e. network rather than system vote). Voting Rights will be based on the latest information available from the Independent Expert.
- Amend the third voting threshold as follows: “At any other Voting Date during the Trial Period as advised by Aurizon Network or the Chair of the Rail Industry Group – Voting Threshold 60%”

We have discussed the proposed amendments with Aurizon network. It is understood that Aurizon Network will provide its views to the QCA independently.

Yours sincerely

**Andrew Barger**