

Queensland Competition Authority
Submitted electronically

16 March 2026

Dear Sir or Madam

Public Submission in respect of Aurizon Network Draft Amending Access Undertaking

I refer to the draft amending access undertaking submitted to the QCA for approval by Aurizon Network Pty Ltd (**Aurizon Network**) on 22 December 2025 (**2025 UT5 DAAU**).

Whitehaven Project Pty Ltd (**Whitehaven**) has been directly involved in the consultative process by which the 2025 UT5 DAAU was developed and signed the Implementation Deed dated 9th December 2025.

Whitehaven is also satisfied that matters of importance to it have been reflected in the terms of the 2025 UT5 DAAU.

Whitehaven is satisfied that the 2025 UT5 DAAU in the form submitted by Aurizon Network to the QCA on 22 December 2025 contains an acceptable outcome for access seekers, access holders and their customers, and that those benefits justify the financial outcomes the proposed amendments to Aurizon Network's undertaking secures for Aurizon Network.

Whitehaven's support of the draft amending access undertaking submitted by Aurizon Network to the QCA on 22 December 2025 is conditional on the draft amending access undertaking being approved by the QCA in materially the same form as it was submitted to the QCA.

Whitehaven does not support a draft amending access undertaking that is materially different to the 2025 UT5 DAAU submitted by Aurizon Network to the QCA on 22 December 2025.

There are some matters contained in the 2025 UT5 DAAU on which Whitehaven does not express a view and in respect of which Whitehaven is happy for the QCA to determine in accordance with its discretion. Those matters are listed in Attachment 1 of this letter.

Subject to the terms of this letter and the condition that the QCA approves the Undertaking in the form (subject to any immaterial changes) submitted by Aurizon Network to the QCA, Whitehaven supports the QCA's approval of the draft amending access undertaking.

If the QCA in its final decision refuses to approve the 2025 UT5 DAAU, then Whitehaven reserves it right to make further submissions to the QCA including in connection with the 2025 UT5 DAAU.

Please feel free to contact myself should you have any matters you would like to discuss.

Yours sincerely



Keiron Rochester
General Manager – Infrastructure

Attachment 1

Whitehaven does not express a view in respect of the following matters contained in the draft amending access undertaking and Whitehaven are happy for the QCA to determine the following in accordance with its discretion.

- 1 the Reference Tariff values in Schedule F (7.2, 8.2, 9.2, 10.2, 11.2);
- 2 the System Allowable Revenue values in Schedule F (7.4, 8.4, 9.4, 10.4, 11.4);
- 3 any changes to payloads in Schedule F compared to those shown in the approved UT5;
- 4 loading times for additional mines not included in the approved UT5; and
- 5 Gtk forecasts within Schedule F, to the extent that they differ to those contained in the approved UT5.