



20 July 2017

Gas Market Reform Group  
C/- Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235

Email: [enquiries@gmrg.coagenergycouncil.gov.au](mailto:enquiries@gmrg.coagenergycouncil.gov.au)

Senex Energy Limited  
ABN 50 008 942 827

Head Office  
Level 14  
144 Edward St  
Brisbane Qld 4000

GPO Box 2233  
Brisbane Qld 4001

T +61 7 3335 9000  
F +61 7 3335 9999

[info@senexenergy.com.au](mailto:info@senexenergy.com.au)  
[senexenergy.com.au](http://senexenergy.com.au)

Dear Dr Vertigan

**RE: Initial National Gas Rules**

Thank you for giving Senex Energy Ltd (**Senex**) the opportunity to provide feedback on the Initial National Gas Rules (**the Rules**) that will form part of the Gas Pipeline Information Disclosure and Arbitration Framework (**the Framework**).

In April 2017, Senex made a submission in response to the Gas Pipeline Information Disclosure & Arbitration Framework Implementation Options Paper in which we made several recommendations associated with information disclosure, the arbitration mechanism and the arbitration (pricing) principles. I am pleased that the Gas Market Reform Group has incorporated in the Rules most of the recommendations contained in that submission and therefore Senex has no additional requested changes to the Rules.

With regard to the proposed wording options for Division Four (Arbitration of Access Disputes) Rule 569 (2)(a), Senex's preference is for the proposed paragraph (a) wording rather than the alternative version of paragraph (a) contained in the drafting note. In making this recommendation, Senex has been guided by the original intention of the Framework, which was not to replicate the prescriptive rules that apply to pipelines subject to full regulation.

I appreciate the opportunity to make this submission on these important changes impacting the gas market and look forward to the implementation of the Rules as we all play our part in ensuring there is sufficient gas available at an appropriate price point to meet Australia's needs, now and into the future.

Should you have any questions in relation to this submission, in the first instance please contact Trevor Robertson, Government and Stakeholder Relations Manager (P: 0409 519 639).

Yours sincerely,

**Ian Davies**  
Managing Director and Chief Executive Officer  
Senex Energy Limited