



9nd December 2015

Allgas Energy Pty Ltd
Scott Young
Regulatory Manager
APA Group
Level 19, HSBC Building
580 George Street
Sydney NSW 2000

By email to scott.young@apa.com.au

Dear Scott,

We write to express an interest in participating in consultation process as part of the Light Regulation regime of Allgas Network, which we understand is operated by APA under an outsourcing agreement.

We have noted this paragraph in the National Competition Council's Final Decision of 28th April 2015 approving the Light Regulation framework (for Allgas):

"3.32 In this regard, the Council considers that the development of a robust consultation process between providers of pipeline services and users of those services (including end-users) is a positive development which may reduce regulatory disputes rather than become an additional regulatory impost. " (Page 14)

The Alternative Technology Association

Founded 35 years ago, the Alternative Technology Association (ATA) is a national, not-for-profit organisation with 6,000 members who are largely residential consumers of energy, water and transport.

ATA presents a two-fold perspective as an energy consumer advocacy organisation: with experience in energy policy, markets and technology and with the continuing support of Energy Consumers Australia, ATA is a strong and informed voice for energy users; in addition, ATA speaks with authority on behalf of the growing portion of the consumer base that has an active interest in demand side participation.

Our Interest in Gas

As you may be aware, with the support of Consumer Advocacy Panel, ATA undertook a detailed analysis of the economics of modern, efficient gas and electric appliances for space heating, water heating and cooking for residential consumers.

The analysis was conducted across jurisdictions, climate zones, gas pricing zones and household types to accurately understand potential costs and benefits in detail. Our research looked at all ownership costs and compared household gas and efficient electric options.

[Research findings](#) were released in late 2014. The ATA has been funded by Energy Consumers Australia in 2015/16 to advocate further for the recommendations in our report.

Our findings in Queensland support the statement on page 4 of your Application that “gas does not have a clear competitive advantage over other fuels in Queensland.”

With funding from ECA we have participated in the AER’s Access Arrangements processes in South Australia and ACT. In Queensland where Allgas has sought and received Light Regulation, we request to participate in “the development of a robust consultation process” referred to by the NCC.

Other Consumer Advocates

Queensland Council of Social Service (QCOS) has endorsed this letter and has expressed support for ATA advocacy as part of the Light Regulation regime of Queensland Gas Distribution Network (QGDN).

Likewise, Council on the Aging (COTA) Queensland has endorsed this letter.

We look forward to hearing from you. Should you have any queries, please do not hesitate to contact either Kate Leslie (kate.leslie@ata.org.au) or myself on 03 9639 1500.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Moyse', with a long horizontal flourish extending to the right.

Damien Moyse

Policy & Research Manager