



12 February 2010

Greenfields applications  
National Competition Council  
Level 9, 128 Exhibition Street  
MELBOURNE VIC 3000

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Dear Sirs

### **QCLNG Pipeline no-coverage application**

Thank you for the opportunity to comment on the QCLNG Pipeline's application for a 15 year no-coverage determination in respect of the CSG pipeline that it proposes to build between the Surat Basin and Curtis Island.

Jemena is owner and operator of the Jemena Queensland Gas Pipeline (QGP) which is an established uncovered pipeline transporting conventional natural gas and coal seam gas between various receipt points and markets in Gladstone and Rockhampton. The QCLNG Pipeline is a potential competitor for QGP in serving those markets to the extent that its shippers have gas available and the pipeline has spare capacity.

Jemena's position is that coverage should be imposed as a last resort in the transmission sector of the gas industry. Coverage introduces regulatory risk and restricts the service provider's flexibility to innovate and meet shippers' needs, particularly if it leads to full regulation. Jemena therefore supports QCLNG Pipeline's application for a 15 year no-coverage determination.

Yours sincerely

A handwritten signature in black ink that reads "Sandra Gamble".

Sandra Gamble  
Group Manager Regulatory