

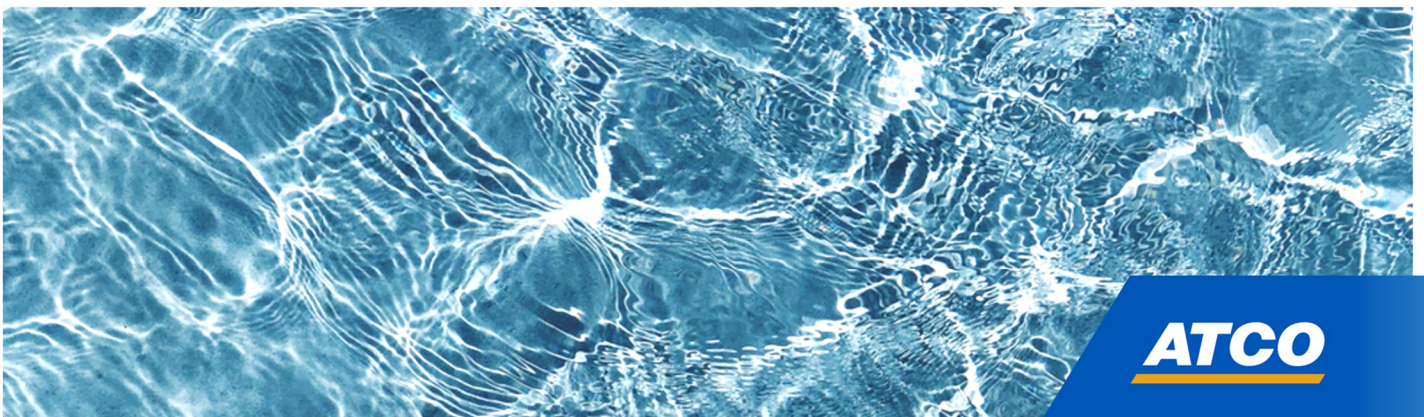


REFERENCE SERVICE PROPOSAL

2025-29 ACCESS ARRANGEMENT

1 September 2022

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REFERENCE SERVICE PROPOSAL

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EXECUTIVE SUMMARY

ABOUT THIS DOCUMENT

ATCO Gas Australia (ATCO) is developing its plans for the Mid-West and South-West Gas Distribution Systems (MWSWGDS) for the Access Arrangement period 2025-2029 (AA6). Under the National Gas Rules (NGR), we are required to submit our Reference Service Proposal to the Economic Regulation Authority (ERA) by 1 September 2022.

This Reference Service Proposal represents our proposed pipeline services for the AA6 period and has been developed in consultation with our customers.

PIPELINE SERVICES

Reference and non-reference services are together called pipeline services, which are defined in the National Gas Law (NGL). The classification of a service as either a reference or a non-reference service is considered at the beginning of the access arrangement review having regard to the reference service factors outlined in the National Gas Rules (NGR) (see Section 1.4). The final classification of services will be approved by the ERA when it makes its 'Reference Service Proposal decision' (which it is required to make by 1 March 2023).

Reference services are pipeline services that form the basis of the prices and terms and conditions for the access arrangement period. Tariffs for reference services are approved by the ERA later in the access arrangement review process.¹ ATCO groups reference services into two categories:

- **Haulage Reference Services:** For the transportation of gas to residential, commercial, and industrial customers. Haulage reference services are used by all users of the MWSWGDS, and all gas delivered through our network is delivered under these services. These services cover the full range of activities involved in receiving, transporting, and delivering gas to our customers.
- **Ancillary Reference Services:** Services that are commonly used by retailers in conjunction with providing a haulage service.

Non-reference services are those services with low or infrequent demand and are typically negotiated on a case-by-case basis with our customers. In the current access arrangement period, non-reference services make up approximately 2% of our revenue from pipeline services. Tariffs and terms and conditions for these services are not determined by the ERA.

PROPOSED SERVICES FOR AA6

- **Haulage Reference Services:** Our engagement with retailers and stakeholders as part of this process supports ATCO continuing to offer the current haulage reference services as reference services into AA6. We are not proposing any changes to these services in AA6 and they continue to remain appropriate reference services based on the reference service factors.

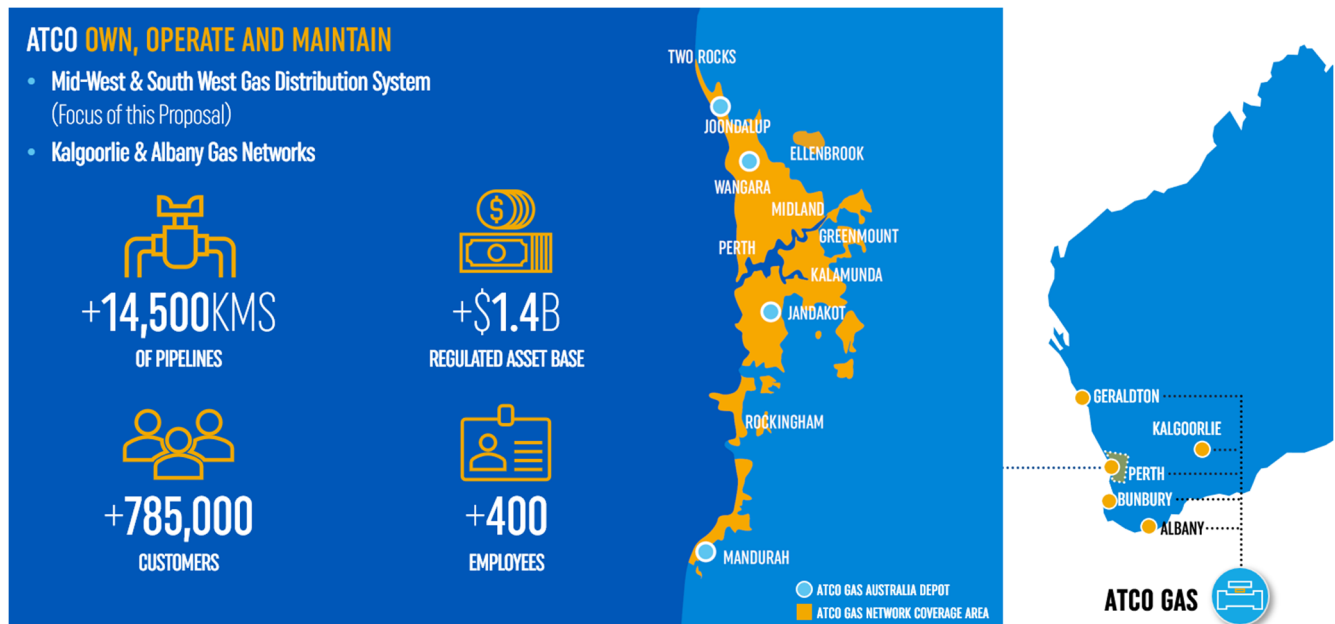
¹ The reference services specified in ATCO's access arrangement proposal must be consistent with the ERA's Reference Service Proposal decision unless there is a material change in circumstances.

- **Ancillary Reference Services:** Our engagement with retailers and stakeholders as part of this process found general support for our ancillary reference services to remain mostly unchanged in AA6 with the addition of the previous non-reference service 'Cut and cap service pipe at the main' (refer to *Section 2*). Ancillary Reference Services remain appropriate reference services based on the reference service factors.
- **Non-Reference Services:** Our non-reference services are not specified as reference services having regard to the reference service factor requirements, primarily due to their low or variable demand, variation of allocatable costs, and higher substitutability.

1. THE GAS NETWORK

ATCO Gas Australia (ATCO) owns and operates the largest gas infrastructure network in Western Australia; the Mid-West and South-West Gas Distribution Systems (MWSWGDS). Our core business is owning, operating, and maintaining gas distribution networks and providing a safe, reliable, affordable and sustainable gas delivery service to residential, commercial, and industrial customers.

Figure 1.1: The ATCO Gas Network



Our network supplies approximately 785,000 customers through a network of pipes that are over 14,500 kilometres in length, supported by an ATCO workforce of over 400 personnel and an additional contracted workforce.

Our networks are located in Geraldton, Bunbury, Busselton, Harvey, Pinjarra, Brunswick Junction, Capel, and the Perth greater metropolitan area. More than 80% of the Perth metropolitan area is serviced by our underground network of pipelines. Further information on our gas network can be found [here](#) or at www.atco.com.

This Reference Service Proposal does not include our gas distribution networks in Albany and Kalgoorlie, as these networks do not require an access arrangement.

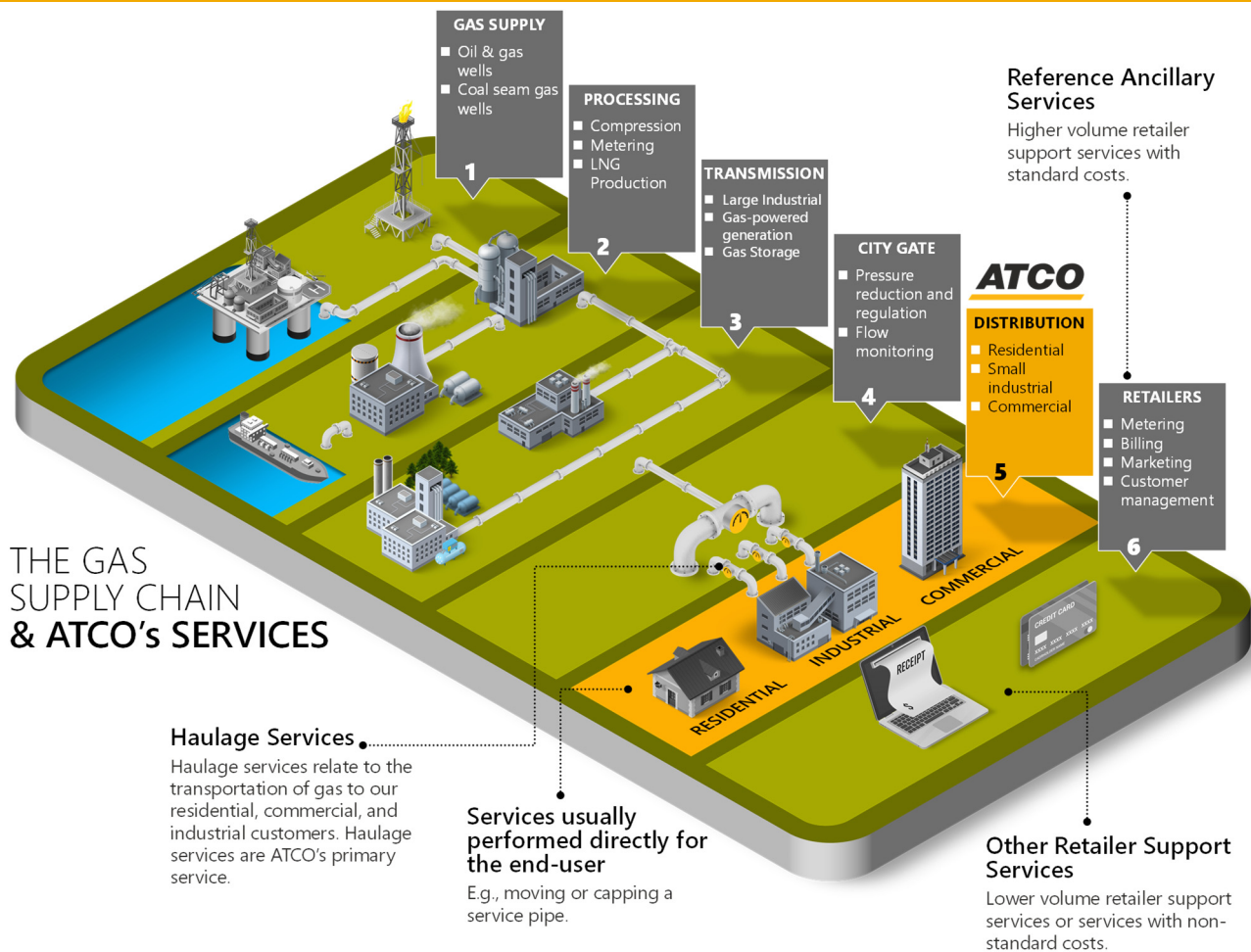
1.1 Our role in the supply chain

Our role in the supply chain is to distribute gas to consumers. Following production and processing, the gas is delivered to the mid-west and south-west of Western Australia through high-pressure transmission pipelines (such as the Dampier to Bunbury Pipeline and the Parmelia Pipeline).

The gas is then received at homes and businesses through our gas distribution network. ATCO owns, operates, and maintains the distribution pipelines up to the meter box of the customer and ATCO owns, maintains, and reads the gas meter at each property.

Retailers organise gas contracts from producers and on-sell gas to consumers. Retailers are also responsible for managing the customers' accounts and are the primary customer contact point.

Figure 1.2: ATCO's role in the gas supply chain and our services²



1.2 Our role in the energy transition

ATCO operates in a dynamic environment and the services detailed in this Reference Service Proposal need to be considered in the context of how things may change between now and 2030.

ATCO has been on a path of energy transition and decarbonisation for many years and is committed to continuing this work. A significant step in our sustainability journey was the January 2022 announcement of our commitment to net-zero emissions and Environmental Social and Governance (ESG) performance targets, several of which focus on the energy transition.³

Natural gas is widely recognised as one of the safest and most reliable sources of energy, and it has been used as a fuel in Australia for nearly 60 years. Natural gas features strongly in Western Australia's current energy profile – it accounts for around half of the total energy consumption. Given our pledge

² Adapted from an image at <https://aemo.com.au/learn/energy-explained/energy-101/industry-overview>

³ Media release available here: <https://www.atco.com/en-ca/about-us/news/2022/122943-atco-announces-strategic-environmental-social-and-governance-tar.html>

to be a net-zero company by 2050, we expect the role of natural gas to evolve over time. ATCO Group's roadmap to net-zero emissions is shown in Figure 1.3 and our full sustainability report can be found [here](#)⁴.

Figure 1.3: ATCO Group's Roadmap to Net-Zero



1.3 Sustainability

In setting our 2030 ESG targets, we have recognised that we must thoughtfully transition our assets and invest in many new and different options, so that our operations and our customers can reduce their emissions in ways that work for their individual situations. We expect our strategy for AA6 to focus on initiatives such as cleaner fuels (hydrogen and renewable natural gas, or RNG), energy efficiency, and carbon offsets to achieve our 2030 targets.

To support the decarbonisation of the gas distribution network, the National Gas Law (NGL) and National Gas Rules (NGR) are currently being changed to extend the regulatory framework to hydrogen and renewable gases. This will enable our network to distribute cleaner fuels and continue to provide valuable energy services to the community.

We are not waiting to act. Later this year, we will commence blending hydrogen through our gas distribution network. This project will be the largest of its kind in Australia, at around 2,700 connections, and will see renewable hydrogen blended into discrete sections of the WA gas distribution network within Glen Iris, Treeby, and Calleya Estates within the City of Cockburn. This will achieve the WA Government's goal of distributing renewable hydrogen in the network by 2022 and take steps towards the longer-term goal of blending up to 10% network-wide by 2030. We are grateful for the support that

⁴ <https://www.atco.com/en-au/our-commitment/environment.html>

we are receiving across the WA Government to achieve this. You can find out more about this project here: <https://www.atco.com/en-au/projects/hydrogen-blending.html>

At this time we haven't made changes to our reference services specifically for hydrogen or renewable gases as the relevant policy and frameworks are still to be developed by the Jurisdictional Officials and the Australian Energy Market Commission.⁵

1.4 Relevant regulatory framework

Under Rule 47A of the NGR, we are required to submit a Reference Service Proposal to the ERA no later than twelve months (being 1 September 2022) prior to the submission of our Access Arrangement revision proposal. In summary, the NGR requires that our Reference Service Proposal must include:

- identification of the MWSWGDS pipeline (*refer to Section 1*)
- a description of all the pipeline services that we can reasonably provide on the MWSWGDS (*refer to Sections 3 and 4 and Appendix A*)
- at least one of these pipeline services to be proposed as a 'reference service', having regard to the 'reference service factors' (*refer to Section 4 and Appendix A1*)
- any stakeholder feedback on the proposed reference services if a stakeholder engagement process has been conducted (*refer to Section 2*).

On receipt of this Reference Service Proposal, the ERA will consider our proposed reference services against the reference service factors, outlined in Figure 1.4, and any ERA-led consultations with stakeholders.

⁵ More information available here: <https://www.energy.gov.au/government-priorities/energy-ministers/priorities/gas/gas-regulatory-framework-hydrogen-renewable-gases>

Figure 1.4: ERA's interpretation of the Reference Service Factors⁶

REFERENCE SERVICE FACTORS

In identifying whether a pipeline service should be specified as a reference service, consideration of the 'reference service factors' is needed. These factors are set out in rule 47A(15) and are used to focus and substantiate the decision-making process that is used to identify which pipeline services should, and can, be provided as a reference service. A reference service is required to have a reference tariff that is determined under the access arrangement framework.

Factor A: Actual and forecast demand for the pipeline service and the number of prospective users of the service

- What is the historic (actual) and future (forecast) demand for the pipeline service?
- How many users are expected to use the pipeline service?

Factor B: The extent to which the pipeline service is substitutable with another pipeline service to be specified as a reference service

- To what extent can the pipeline service be substituted with another pipeline service that is specified as a reference service?
- If substitutable, does the pipeline service need to be specified as a separate reference service?
- Where substitutable pipeline services exist, which of the services (if any) should be specified as reference services?

Factor C: The feasibility of allocating costs to the pipeline service

- Can the costs of providing the pipeline service be determined?
- Do the costs include any shared costs, or just direct costs?
- Is it feasible to allocate shared costs to the pipeline service?

Factor D: The usefulness of specifying the pipeline service as a reference service in supporting access negotiations and dispute resolution for other pipeline services

- If specified as a reference service, will the pipeline service support access negotiations and dispute resolution for other pipeline services?
- Can the associated reference tariff serve as a benchmark for the price of pipeline services that are not reference services?
- Can the associated reference service terms and conditions serve as a benchmark for the terms and conditions of pipeline services that are not reference services?

Factor E: The likely regulatory cost for all parties (including the ERA, users, prospective users and the service provider) in specifying the pipeline service as a reference service

- What are the likely regulatory costs for all parties in specifying the pipeline service as a reference service?
- Are the likely regulatory costs justified when considering the usefulness of specifying the pipeline service as a reference service?

⁶ As set out in the ERA Gas Access Arrangement Guidelines - <https://www.erawa.com.au/cproot/22786/2/Gas---Gas-Access-Arrangement-Guideline---July-2022.PDF> at p35.

2. STAKEHOLDER ENGAGEMENT

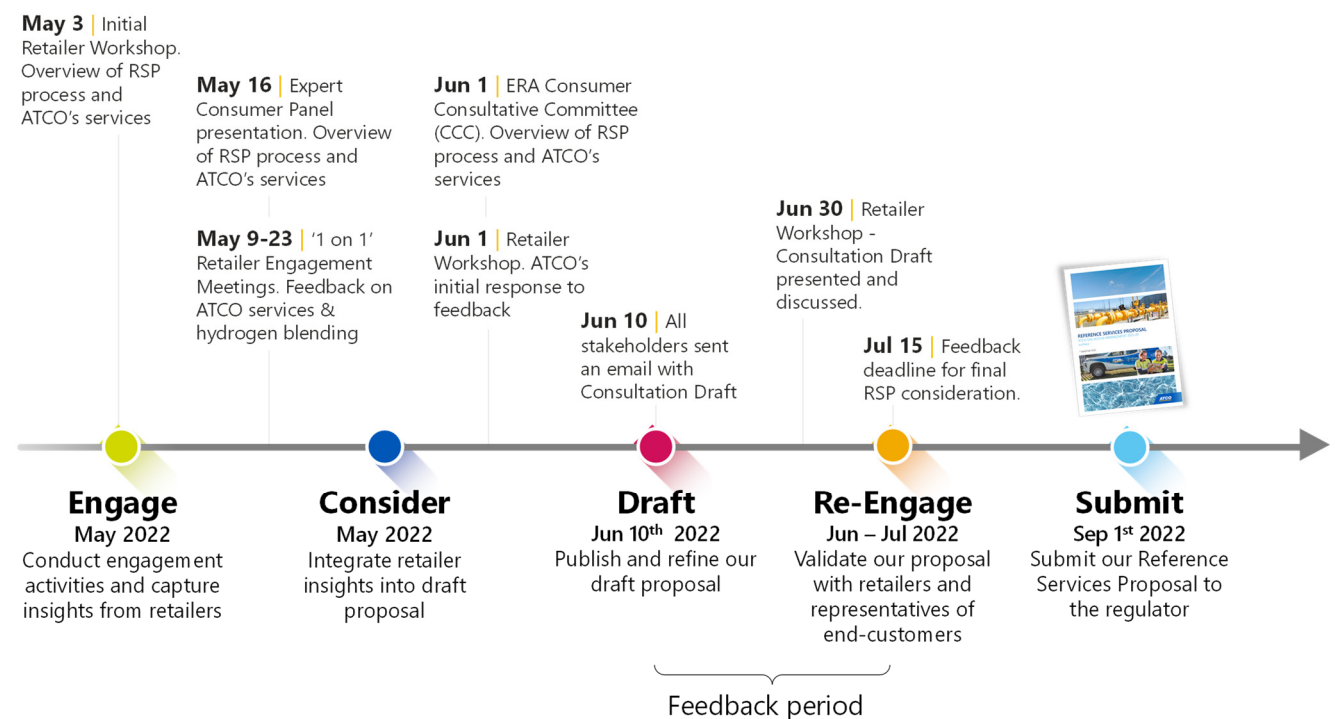
As a global infrastructure and energy solutions provider for 75 years, ATCO has built a strong reputation as a community-focussed business. Building respectful and mutually beneficial relationships with communities, with Indigenous Peoples, and with businesses has long defined how we do business. Together with these partners, we are continually exploring new ways to collaborate. We recognise that our long-term success depends on both our ability to understand our customers’ requirements today, and to anticipate their needs and expectations tomorrow.

Meaningful and ongoing customer and stakeholder engagement is at the core of how we operate and has been an important input into our Reference Service Proposal development. This chapter explains our approach to stakeholder engagement and outlines how the process has affected our Reference Services Proposal.

2.1 Our approach

Our Reference Service Proposal has considered our conversations with gas network stakeholders and the broader community. Our five-phased approach was to engage early, engage often, and to ensure our customers’ needs are being considered. ATCO’s Engagement Approach is outlined in Figure 2.1, with further detail of our activities in Table 2.1.

Figure 2.1: ATCO’s Reference Service Proposal Engagement Approach



The first phase (Engage) of our engagement program provided an opportunity for our stakeholders to understand and discuss the services we offer and whether these services sufficiently met their needs. This phase focussed on Western Australian gas retailers and end consumer representatives (e.g.,

through the WA ACE Forum’s Expert Consumer Panel (ECP) and the ERA’s Consumer Consultative Committee). This phase included an initial engagement through workshops and follow-up ‘1:1’ meetings to capture more detailed feedback and discussion on our proposed services.

Table 2.1: Engage Phase – Detailed engagement activities

DATE	ENGAGEMENT	TOPICS	ATTENDEES
MAY 3	Retailer Workshop (2-hour MS Teams meeting)	Overview of RSP process and timeline, and presentation of ATCO’s services	1-5 representatives from all retailers, 1 rep. from ERA (total 27 attendees)
MAY 16	Expert Consumer Panel presentation	Overview of RSP process and timeline, and presentation of ATCO’s services	Expert Consumer Panel Members
MAY 10-23	Individual 1:1 retailer engagement meetings	Deeper drive into the RSP and individual retailer feedback. ATCO also used this time to explain H2 blending approach.	<p>May 10– Agora Retail: 2 retailer attendees 6 ATCO attendees</p> <p>May 17– Origin Energy: 4 retailer attendees 4 ATCO attendees</p> <p>May 17- Amanda Energy: 3 retailer attendees 4 ATCO attendees</p> <p>May 18- Alinta: 9 retailer attendees 5 ATCO attendees</p> <p>May 19- Kleenheat: 3 retailer attendees 5 ATCO attendees</p> <p>May 19- AGL Perth Energy: 2 retailer attendees 3 ATCO attendees</p> <p>May 20- Simply Energy: 2 retailer attendees 4 ATCO attendees</p> <p>May 20- AGL: 3 retailer attendees 4 ATCO attendees</p> <p>May 23- Synergy: 3 retailer attendees 4 ATCO attendees</p>
JUN 1	ERA Consumer Consultative Committee (CCC) meeting	Overview of RSP process and timeline, and presentation of ATCO’s services	3 ATCO attendees 26 ERA stakeholder and consumer attendees
JUN 1	Retailer Workshop (1-hour MS Teams meeting)	Review 1:1 and RSP feedback as a cohort	1-5 representatives from all retailers, 1 rep. from ERA (total 26 attendees)

All feedback from the first phase of our program was collated and ATCO's responses were provided in an initial 'consultation draft' of our Reference Services Proposal, which was published on June 10th, 2022.

The second phase (Re-Engage Phase) of our engagement program followed on from the publication of the 'consultation draft' of our Reference Services Proposal. This phase focused on ensuring that our stakeholders understood our proposal and included a workshop with the retailers. The phase culminated in ATCO receiving two written submissions on the 'consultation draft'.



Table 2.2: Re-Engage Phase – Detailed engagement activities

DATE	ENGAGEMENT	TOPICS	OUTCOME
JUN 30	Retailer Workshop	Draft RSP presented and discussed through 1 hour meeting via MS Teams. Retailers asked to provide Draft RSP feedback by July 15.	2 retailers submitted feedback via email by July 15.

Our Reference Services Proposal has reviewed and considered the further feedback from the Re-Engage Phase in developing this final proposal for submission. This feedback and our corresponding amendments are detailed in Section 2.2.

2.2 Feedback on our proposed services

We are fortunate to report that there was much support for our current reference and non-reference services from the retailer group. The workshops and meetings were well-attended, and we collated feedback on our services and a range of operational matters. We treat all feedback as valuable, and anything considered out of scope of the Reference Service Proposal process has been directed to the relevant team and will continue to be addressed outside of the Reference Service Proposal process.

Our responses to the feedback related directly to ATCO's proposed reference and non-reference services are provided in Table 2.3.

Table 2.3: Stakeholder feedback and ATCO's response

TOPIC	FEEDBACK	ATCO'S RESPONSE
Zero consumption meters	Retailers proposed a zero-consumption tariff with a low or no standing charge where there had been zero consumption for greater than 12 months. It was suggested that this would encourage retailers to leave non-consuming meters in-situ and facilitate working together with ATCO to encourage customers to take up gas.	<p>As noted in our Consultation Draft, ATCO still incurs maintenance and meter reading costs even for meters that have zero consumption for extended periods. We have structured our standing charge to be based on the costs associated with these activities. For example, it is necessary to read the meter to monitor for any unbilled gas, to ensure safety and maintain an emergency response capability.</p> <p>Although tariffs and charges are out of scope of the Reference Services Proposal, we acknowledge this feedback and will work with retailers on how best to manage zero consumption meters through our operational processes.</p>
Meter read frequency	A retailer asked if ATCO could read meters monthly to support more regular billing for small business customers (B2 & B3) that are currently billed every three months. Further feedback was received on the potential use of 'data loggers', particularly for larger customers with volatile usage.	<p>We received a mixed response on meter reading frequency in the first phase of our engagement program, with most retailers indicating that they can estimate monthly usage if there is a steady load, and that interval data may be more useful than monthly reads.</p> <p>In response to the further feedback on the potential use of data loggers, we note that ATCO currently provides a non-reference service for data logging ('install telemetry or pulse head'). This service can be accessed to provide greater accuracy and timeliness of usage data if required.</p>
Meter self-reads	Retailers were interested in a 'customer self meter read' option and were supportive of ATCO implementing this service within the current AA5 period. Retailers wanted to ensure the integrity of the self-read data was maintained.	<p>Although out of scope of the Reference Services Proposal, ATCO is currently investigating a customer self meter read mobile application and the appropriate systems to ensure the integrity of the read. We expect to implement this change within the AA5 period and will work with retailers to ensure any issues with data are addressed promptly.</p> <p>We do not consider that this needs any changes to our Reference Service Proposal.</p>

TOPIC	FEEDBACK	ATCO'S RESPONSE
Disconnection method in street	<p>Consider installing cut-off valves in the street at the time of disconnection to avoid higher cost of future reconnection.</p> <p>Further feedback proposed that if the barrier to disconnection is a matter of restricted access, then this is an appropriate scenario to install a cut-off valve and ATCO should keep an open mind and consider its application in appropriate circumstances.</p>	<p>For disconnections that have escalated to disconnect in the street, ATCO's concern is that the affected customers can still interfere with the cut-off valves in the street and create a safety issue.</p> <p>ATCO's aim for the TAC isolation device is to reduce the number of escalations to disconnection in the street.</p> <p>Given the feedback, ATCO agrees to consider requests for the installation of a street cut-off valve on a case-by-case basis given the low volumes expected.</p>
Trailer Air Coupling (TAC) isolation devices	<p>Retailers were initially questioning whether TAC isolation devices should be introduced as a reference service. Following further consultation, stakeholders supported retaining TAC isolation as a non-reference service while demand remains low.</p>	<p>Demand for TAC isolation devices is still uncertain, as current numbers are relatively low and inconsistent. As a result, TAC devices are not proposed as a reference service for AA6 at this time.</p> <p>ATCO will continue to monitor demand of TAC devices through AA6 to monitor any consistent increase in demand (including escalations of disconnection types).</p>
Seasonal tariffs	<p>In our initial engagement, ATCO was requested to consider introducing a seasonality or demand-based tariff to align with demand profiles more closely – similar to some East Coast network service providers (NSP). Further feedback from one retailer re-emphasised the request, noting that smart metering would not be required. Feedback from another retailer noted that without appropriate smart metering these seasonal tariffs are difficult to manage.</p>	<p>Tariff changes are outside of the scope of the Reference Services Proposal and will be considered as part of the broader Access Arrangement process. East Coast gas networks, such as Multinet, are moving away from seasonal tariffs due to their complexity and following clear feedback from their customer engagement process – where ~80% of Multinet's engagement participants were supportive of removing seasonal pricing⁷.</p> <p>For commercial or residential customers, we believe there are also practical limitations with time-of-use or seasonal tariffs given the existing metering technology and meter read frequency.</p> <p>In general, stakeholders were supportive of ATCO making additional investment in smart metering facilities (which could support innovation in tariff structures), and should this advanced metering infrastructure become more prevalent in the future, this will be re-considered. ATCO welcomes further feedback on this issue during the Access Arrangement process.</p>

⁷ Multinet. *Five year plan for our Victorian distribution network, Final Plan*. July 2022, p139

TOPIC	FEEDBACK	ATCO'S RESPONSE
Cut and cap service pipe at main (Previously 'Demolitions')	Consider removing charges associated with disconnecting the service for demolitions. In other jurisdictions there are incidences where demolition has gone ahead without the meter or service pipe being properly removed causing safety issues.	ATCO has experienced very few illegal demolitions (removal or capping the service pipe at the main). Our experience is at most one or two per year. Given the small number of incidents, we are not proposing to incorporate any changes to our Reference Service Proposal.
	One retailer proposed that this be made a reference service due the reported demand (2,030) and lack of substitutability.	ATCO has considered this feedback and also reviewed the ERA's Reference Service Factors. In AA6, we will make the 'Cut and cap service pipe at main' a reference service. In making this change we expect to maintain our current process that requires the 'Deregistering a delivery point' service to be sought in conjunction with this service. This will minimise the regulatory cost in specifying this as a reference service. We have illustrated the process in Appendix A3.
Services that fully offset the carbon emissions	Feedback suggested that schemes of this nature are also being considered by Retailers. Although additional <i>services</i> are not supported, offset ' <i>tariffs</i> ' could be considered by ATCO.	ATCO does not propose to include any new or amended haulage services for AA6 that relate to carbon offsets at this time. Tariff changes are out of scope of this Reference Services Proposal and ATCO may revisit the offset tariff during the Access Arrangement process.
Enabling the distribution of cleaner fuels (e.g., hydrogen and renewable natural gas, or RNG)?	Retailers supported ATCO's investigation of hydrogen blending (including heating value impacts), but believe it is premature for any service changes to be made until there is greater certainty in government policy.	ATCO supports this position and will continue to work with stakeholder groups as relevant policy is further developed and implemented.

TOPIC	FEEDBACK	ATCO'S RESPONSE
Is there demand for consumption data to be available immediately for end users?	Retailers proposed that although more frequent meter data would be useful for customers wanting to manage their energy usage, it should be considered as part of a broader 'smart-metering' roll-out.	<p>ATCO currently provides a non-reference service for data logging ("install telemetry or pulse head"), this service can be accessed to provide greater accuracy and frequency of usage data if required, however, this would only be cost-effective for larger demand users (e.g., A1, A2, and B1).</p> <p>For B2 and B3 customers, ATCO will seek to discuss smart-metering solutions with retailers as part of the next phase of the AA6 process. We support the position that more frequent meter data would be part of any smart meter roll-out and without this enhanced technology, usage data frequency will remain as per the current meter reading cycle.</p>

3. CURRENT SERVICES

Reference and non-reference services are together called *pipeline services* which are defined in the National Gas Law (NGL). Reference services are pipeline services that **form the basis of the prices and terms and conditions for the access arrangement period**. In the current AA5 period, reference services make up around 98% of our revenue on the MWSWGDS, see Figure 3.1.

Reference services fall into two categories:

- Haulage reference services – the transportation of gas for our residential, commercial, and industrial demand customers
- Ancillary reference services – commonly used services ancillary to providing a haulage service.

Non-reference services are services that typically have low or infrequent demand from our customers. Non-reference services can be negotiated on a case-by-case basis with customers.

Figure 3.1: Pipeline Services Revenue

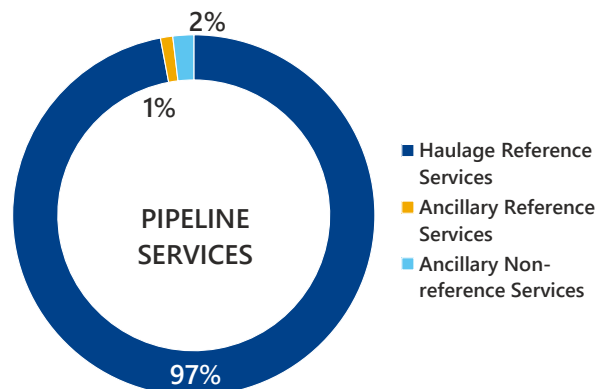
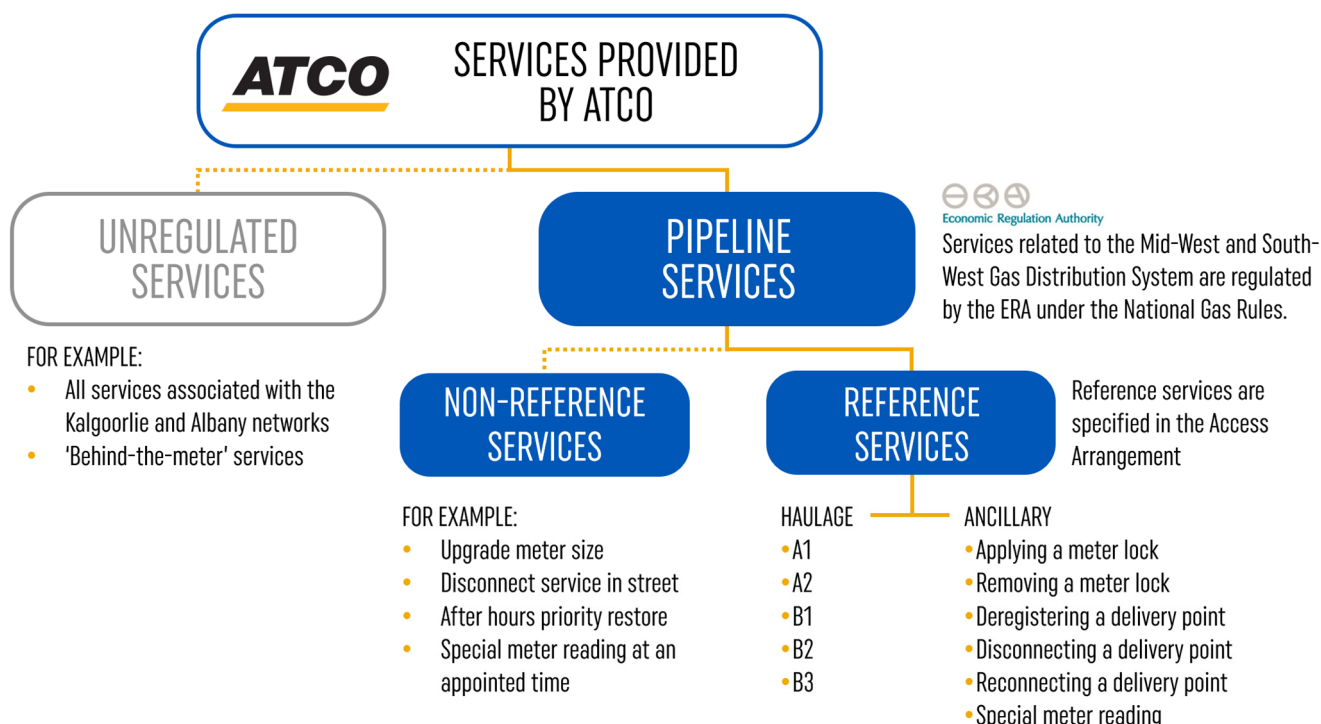


Figure 3.2: Services provided by ATCO



3.1 Current Reference Services in AA5

Table 3.1: Haulage Reference Services

HAULAGE REFERENCE SERVICE	DESCRIPTION
A1	Major industrial customers using >35 TJ of gas per year, at high or medium pressures
A2	Large customers using between 10 and 35 TJ of gas per year, at high or medium pressures
B1	Medium sized customers using <10 TJ of gas per year, at high or medium pressures
B2	Small-use customers with a standard meter with capacity from 12m ³ /h to less than 18m ³ /h, typically commercial or large residential, supplied at medium or low pressures
B3	Small-use customers with a standard meter capacity less than 12m ³ /h, typically residential or small business customers, supplied at medium or low pressures

Table 3.2: Ancillary Reference Services

REFERENCE SERVICE	DESCRIPTION
Disconnections	<ul style="list-style-type: none"> Applying a meter lock Disconnection (proposed to be called 'Remove regulator' in AA6)
Reconnections	<ul style="list-style-type: none"> Removing a meter lock Reconnection (proposed to be called 'Re-install regulator' in AA6)
Deregistration	<ul style="list-style-type: none"> Deregistering a delivery point
Special read	<ul style="list-style-type: none"> Request to perform a special read on a basic meter.

3.2 Current Non-reference Services in AA5

Table 3.3: Ancillary non-reference services

NON-REFERENCE SERVICE	DESCRIPTION
Disconnections	<ul style="list-style-type: none"> Applying a Trailer Air Coupling (TAC) isolation device Disconnect service in street
Reconnections	<ul style="list-style-type: none"> Removing a TAC isolation device Removing a TAC isolation device same day business hours Remove meter lock same day business hours Remove meter lock after hours Reconnect service in street Priority re-install regulator - business hours only

NON-REFERENCE SERVICE	DESCRIPTION
Service removal	<ul style="list-style-type: none"> Demolition (proposed to be called 'Cut and cap service pipe at the main' in AA6)
Meter reading services	<ul style="list-style-type: none"> Special read at appointed time
Other meter services	<ul style="list-style-type: none"> Meter retake and test Remove meter set (non-standard meter or meter $\geq 18\text{m}^3/\text{hr}$) Additional metering information - install telemetry or pulse head
Alter delivery facilities	<ul style="list-style-type: none"> Alter meter position and/or a gas service pipe Alter the position of a gas service pipe only Upgrade meter-pressure $\leq 2.75\text{kPa}$ Upgrade meter-pressure $> 2.75\text{kPa}$ Upgrade meter up to M18AL Upgrade to non-standard meter Emergency change over Mains extension - single
Other services that the Service Provider agrees to provide	Any other service requested by a retailer or customer that may arise

4. PROPOSED SERVICES SUMMARY

This Reference Service Proposal has been prepared to ensure our proposed services for the next AA6 period meet the requirements of the National Gas Rules, and appropriately address the needs of retailers and end customers. We have considered the feedback provided by stakeholder as outlined in *Section 2*.

We have provided our full list of proposed pipeline services for AA6, including our assessment against the reference service factors, in Appendix A. ATCO considers these are all the pipeline services that can reasonably be provided on the MWSWGDS.

4.1 Proposed Haulage Reference Services for AA6

We will continue to offer haulage services as a reference service in the next access arrangement. Haulage reference services are used by all users of the MWSWGDS, and all gas delivered through our network is delivered under these services. These services cover the full range of activities involved in receiving, transporting, and delivering gas to our customers.

Haulage reference services will be unchanged in the next access arrangement period. They remain appropriate reference services based on consideration of the ERA's guideline and the reference service factors as illustrated in the table below:

Table 4.1: Haulage Services – Reference Service Factors

REFERENCE SERVICE FACTORS	OVERALL ASSESSMENT
FACTOR A: Actual and forecast demand for the service and number of customers.	Haulage services have the highest demand and generate most of our revenue.
FACTOR B: Whether the service is substitutable for another reference service.	Haulage services are not substitutable by other reference services.
FACTOR C: Whether it is feasible to allocate costs to the service.	Costs can be reasonably allocated to the haulage services.
FACTOR D: Whether the service is useful in supporting access negotiations and dispute resolution for non-reference services.	This a largely irrelevant factor, as ATCO rarely receives requests for services not specified in the access arrangement. We believe however that our haulage services do provide a basis for negotiation.
FACTOR E: The likely regulatory costs of making the service a reference service.	Regulatory costs are minimised by retaining existing services.

4.2 Proposed Ancillary Reference Services for AA6

Ancillary reference services will remain mostly unchanged in the AA6 period, with the addition of the previous non-reference service 'Cut and cap service pipe at the main'. ATCO has considered feedback regarding the 'Cut and cap service pipe at the main' service and also reviewed the ERA's guidelines on its interpretation of the Reference Service Factors. In AA6, we will make the 'Cut and cap service pipe at main' service a reference service. The service is sought by a significant portion of the market (the service is delivered approximately 2,000 times per year), and the service is not substitutable with any other reference service.

Our Ancillary Services are appropriate reference services based on consideration of the ERA's guideline and the reference service factors. Stakeholders were generally supportive of our ancillary reference services with some requests for further discussion that we have considered (refer to *Section 2*). Our assessment against the reference service factors is illustrated in Table 4.2:

Table 4.2: Ancillary Services – Reference Service Factors

REFERENCE SERVICE FACTORS	OVERALL ASSESSMENT
FACTOR A: Actual and forecast demand for the service and number of customers.	Ancillary reference services are those with the highest demand out of our full list of ancillary services and generate most of our ancillary service revenue.
FACTOR B: Whether the service is substitutable for another reference service.	Some services may be substitutable by other higher cost services with lower volumes. However, we propose that the current services are the most appropriate due to the higher levels of demand.
FACTOR C: Whether it is feasible to allocate costs to the service.	Costs can be reasonably allocated to the services.
FACTOR D: Whether the service is useful in supporting access negotiations and dispute resolution for non-reference services.	This a largely irrelevant factor, as the services are standard within the market and there is little demand for variations other than those lower demand non-reference services.
FACTOR E: The likely regulatory costs of making the service a reference service.	Regulatory costs are minimised by retaining existing services.

4.3 Proposed Non-Reference Services for AA6

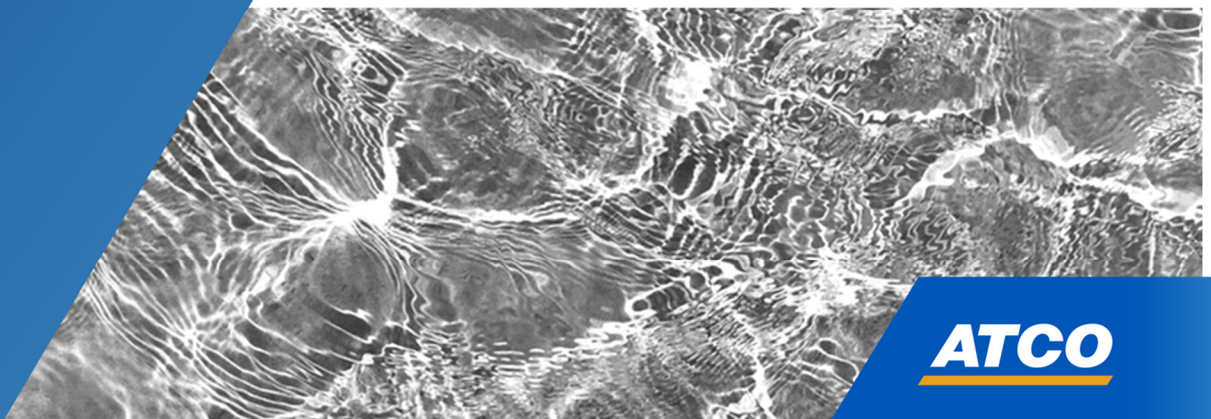
We consider that our proposed Non-Reference Services should not be specified as reference services having regard to the reference service factor requirements, primarily due to their low or variable demand, variation of allocatable costs, and higher substitutability:

- Several Non-Reference Services have low and/or unpredictable demand, e.g., 'Meter retake and test' experiences low demand with only eleven incidences of this service in 2021

- Some Non-Reference Services have highly variable costs depending on the specific customer requirements. Given the highly variable nature of these costs, a standard charging methodology risks allocating costs unfairly and is not consistent with the long-term interests of consumers. For example, the cost of providing an 'Alter meter position' service will vary depending on the specific circumstances and the distance the meter is required to be shifted.
- Some Non-Reference Services are substitutable with regular services, e.g., 'Remove meter lock same day after hours' and 'Special meter read at an appointed time' are premium services and can be substituted by the ancillary reference services 'Removing a Meter Lock' and 'Special meter read' respectively.

APPENDIX A

DETAILED SERVICES LIST



A1. PROPOSED REFERENCE SERVICES

A1.1 Haulage Reference Services

Table A1.1: Haulage Reference services

REFERENCE SERVICE	DESCRIPTION	SERVICE USAGE (2021)	REFERENCE SERVICE FACTORS	AA6 SERVICE PROPOSAL
A1	Major industrial customers using > 35 TJ of gas per year, at high or medium pressures	Customer numbers: 74 Demand pa (TJ): 12,342 Revenue pa (\$M): 7.0	A. Sought by a significant part of the market: Yes B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: Yes E. Regulatory costs in specifying a reference: Low	Keep as Reference Service
A2	Large customers using between 10 and 35 TJ of gas per year, at high or medium pressures	Customer numbers: 104 Demand pa (TJ): 1,829 Revenue pa (\$M): 4.5	A. Sought by a significant part of the market: Yes B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: Yes E. Regulatory costs in specifying a reference: Low	Keep as Reference Service
B1	Medium sized customers using < 10 TJ of gas per year, at high or medium pressures	Customer numbers: 1,877 Demand pa (TJ): 2,076 Revenue pa (\$M): 9.4	A. Sought by a significant part of the market: Yes B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: Yes E. Regulatory costs in specifying a reference: Low	Keep as Reference Service
B2	Small-use customers with a standard meter with capacity from 12 m ³ /h to less than 18 m ³ /h, typically commercial or large residential, supplied at medium or low pressures	Customer numbers: 12,229 Demand pa (TJ): 1,328 Revenue pa (\$M): 9.0	A. Sought by a significant part of the market: Yes B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: Yes E. Regulatory costs in specifying a reference: Low	Keep as Reference Service
B3	Small-use customers with a standard meter capacity less than 12 m ³ /h, typically residential or small business customers, supplied at medium or low pressures	Customer numbers: 751,397 Demand pa (TJ): 10,512 Revenue pa (\$M): 132.6	A. Sought by a significant part of the market: Yes B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: Yes E. Regulatory costs in specifying a reference: Low	Keep as Reference Service

A1.2 Ancillary Reference Services

Table A1.2: Ancillary Reference Services

REFERENCE SERVICE	DESCRIPTION	INDICATIVE ANNUAL SERVICE USAGE <i>(from relevant period)</i> ⁸		REFERENCE SERVICE FACTORS	AA6 SERVICE PROPOSAL
DISCONNECTIONS FOR RETAILER CREDIT CONTROL					
Applying a Meter Lock	Attaching a lock to the valve that comprises part of the standard delivery facilities to prevent gas from being received at the delivery point. This service is available at delivery points receiving the B2 or B3 haulage service.	Quantity pa: Revenue pa (\$M):	9,508 0.49	A. Sought by a significant part of the market: Yes B. Service is substitutable: Yes C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: Yes E. Regulatory costs in specifying a reference: Low	Keep as Reference Service
Remove regulator	Physically disconnecting a delivery point to prevent gas from being delivered to the delivery point. This service is available at delivery points receiving the B2 or B3 haulage service.	Quantity pa: Revenue pa (\$M):	3,481 0.36	A. Sought by a significant part of the market: Yes B. Service is substitutable: Yes C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: Yes E. Regulatory costs in specifying a reference: Low	Keep as Reference Service
RECONNECTIONS FOR RETAILER CREDIT CONTROL					
Removing a Meter Lock	Removing the lock that was applied to a valve comprising part of the standard delivery facilities to prevent gas from being received at the delivery point. This service is available at delivery points receiving the B2 or B3 haulage service.	Quantity pa: Revenue pa (\$M):	7,886 0.22	A. Sought by a significant part of the market: Yes B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: Yes E. Regulatory costs in specifying a reference: Low	Keep as Reference Service
Re-install regulator	Reconnecting a delivery point to allow gas to be delivered to the delivery point. This service is available at delivery points receiving the B2 or B3 haulage service.	Quantity pa: Revenue pa (\$M):	3,063 0.45	A. Sought by a significant part of the market: Yes B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: Yes E. Regulatory costs in specifying a reference: Low	Keep as Reference Service

⁸ Quantities and Revenue have been taken from the periods that most reflect expected annual demand, to normalise the effect from the atypical COVID-19 demand fluctuations.

REFERENCE SERVICE	DESCRIPTION	INDICATIVE ANNUAL SERVICE USAGE <i>(from relevant period)</i> ⁸		REFERENCE SERVICE FACTORS	AA6 SERVICE PROPOSAL	
DISCONNECTIONS						
Deregistering a delivery point	<p>A delivery point is permanently deregistered by:</p> <p>i) removing the delivery point (as per the Retail Market Procedures), ii) removing the delivery point from the Delivery Point Register and iii) for delivery points receiving the B2 or B3 haulage service, removing the meter (where ATCO considers necessary).</p> <p>For delivery points receiving the A1, A2 or B1 haulage service, removal of the meter set is a separate service (refer to the "Remove meter set and make safe service" below).</p>	Quantity pa:	2,135	A. Sought by a significant part of the market:	Yes	Keep as Reference Service
		Revenue pa (\$M):	0.27	B. Service is substitutable:	No	
				C. Feasible to allocate costs to the service:	Yes	
				D. Useful in supporting access negotiations:	Yes	
				E. Regulatory costs in specifying a reference:	Low	
Cut and cap service pipe at the main (Previously Demolition)	<p>Following the successful deregistration and meter removal, this service is for the capping of the service pipe at the main to make safe under standard site conditions.</p> <p>This service is available only at delivery points that previously received the B2 or B3 haulage service and have also sought the "Deregistering a delivery point" service.</p>	Quantity pa:	2,030	A. Sought by a significant part of the market:	Yes	Change to Reference Service Based on stakeholder feedback on the level of demand
		Revenue pa (\$M):	1.60	B. Service is substitutable:	No	
				C. Feasible to allocate costs to the service:	Yes	
				D. Useful in supporting access negotiations:	Yes	
				E. Regulatory costs in specifying a reference:	Low	
METER READING SERVICES						
Special read	<p>Request to perform a special read on a basic meter.</p> <p>This service is available at delivery points receiving the B1, B2 or B3 haulage service.</p>	Quantity pa:	105,066	A. Sought by a significant part of the market:	Yes	Keep as Reference Service
		Revenue pa (\$M):	1.41	B. Service is substitutable:	No	
				C. Feasible to allocate costs to the service:	Yes	
				D. Useful in supporting access negotiations:	Yes	
				E. Regulatory costs in specifying a reference:	Low	

A2. PROPOSED NON-REFERENCE SERVICES

A2.1 Non-Reference Services

Table A2.1: Ancillary non-reference services

NON-REFERENCE SERVICE	DESCRIPTION	INDICATIVE ANNUAL SERVICE USAGE <i>(from relevant period)</i> ⁹		REFERENCE SERVICE FACTORS	AA6 SERVICE PROPOSAL
DISCONNECTIONS FOR RETAILER CREDIT CONTROL					
Applying a TAC Isolation Device	Attaching an isolation device to the valve that comprises part of the standard delivery facilities to prevent gas from being received at the delivery point. This service is available at delivery points receiving the B3 haulage service subject to suitability of meter control valve to fit isolation device.	Quantity pa: Revenue pa (\$M):	100 0.03	A. Sought by a significant part of the market: B. Service is substitutable: C. Feasible to allocate costs to the service: D. Useful in supporting access negotiations: E. Regulatory costs in specifying a reference:	No Yes Yes N/A Low Non-reference service due to low demand and substitutability with a reference service (Apply meter lock)
Disconnect Service in Street	Used to initiate a disconnection of supply when access to the meter is not possible, or endangers the safety of the field personnel, and disconnection of supply can only be effected by disconnecting the service pipe in the street (or closing isolation valve).	Quantity pa: Revenue pa (\$M):	136 0.13	A. Sought by a significant part of the market: B. Service is substitutable: C. Feasible to allocate costs to the service: D. Useful in supporting access negotiations: E. Regulatory costs in specifying a reference:	No No Yes N/A Low Non-reference service due to low demand
RECONNECTIONS FOR RETAILER CREDIT CONTROL					
Removing a TAC Isolation Device	Removing the isolation device that was applied to a valve comprising part of the standard delivery facilities to prevent gas from being received at the delivery point. This service is available at delivery points receiving the B3 haulage service.	Quantity pa: Revenue pa (\$M):	100 0.02	A. Sought by a significant part of the market: B. Service is substitutable: C. Feasible to allocate costs to the service: D. Useful in supporting access negotiations: E. Regulatory costs in specifying a reference:	No No Yes N/A Low Non-reference service due to low demand

⁹ Quantities and Revenue have been taken from the periods that most reflect expected demand, to normalise the effect from the atypical COVID-19 demand fluctuations.

NON-REFERENCE SERVICE	DESCRIPTION	INDICATIVE ANNUAL SERVICE USAGE <i>(from relevant period)</i> ⁹	REFERENCE SERVICE FACTORS	AA6 SERVICE PROPOSAL
Remove meter lock same day business hours	Reconnecting a delivery point to allow gas to be delivered at the delivery point outside of normal business hours by removing meter lock. This service is available at delivery points receiving the B2 or B3 haulage service.	Quantity pa: 440 Revenue pa (\$M): 0.00	A. Sought by a significant part of the market: No B. Service is substitutable: Yes C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand and substitutability with a reference service (Remove meter lock)
Remove meter lock same day after hours	Removing the lock that was applied to a valve comprising part of the standard delivery facilities to prevent gas from being received at the delivery point as a priority. This service is available at delivery points receiving the B2 or B3 haulage service.	Quantity pa: 22 Revenue pa (\$M): 0.00	A. Sought by a significant part of the market: No B. Service is substitutable: Yes C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand and substitutability with a reference service (Remove meter lock)
Reconnect service in street	Used to request reconnection of gas supply, previously disconnected in the street.	Quantity pa: 141 Revenue pa (\$M): 0.13	A. Sought by a significant part of the market: No B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand
Priority re-install regulator – business hours only	Reconnecting a delivery point to allow gas to be delivered to the delivery point as a priority. This service is available at delivery points receiving the B2 or B3 haulage service.	Quantity pa: 220 Revenue pa (\$M): 0.06	A. Sought by a significant part of the market: No B. Service is substitutable: Yes C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand and substitutability with a reference service (Re-install regulator)
Priority remove TAC Isolation Device – business hours only	Removing the isolation device that was applied to a valve comprising part of the standard delivery facilities to prevent gas from being received at the delivery point as a priority. This service is available at delivery points receiving the B3 haulage service.	Quantity pa: N/A Revenue pa (\$M): N/A	A. Sought by a significant part of the market: No B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to expected low demand

NON-REFERENCE SERVICE	DESCRIPTION	INDICATIVE ANNUAL SERVICE USAGE <i>(from relevant period)</i> ⁹	REFERENCE SERVICE FACTORS	AA6 SERVICE PROPOSAL
METER READING SERVICES				
Special read at appointed time	Request to perform a special read on a basic meter at a time agreed by AGA with the customer based on contact details and indicative appointment details provided by the User. This service is available at delivery points receiving the B1, B2 or B3 haulage service.	Quantity pa: 2,610 Revenue pa (\$M): 0.21	A. Sought by a significant part of the market: B. Service is substitutable: C. Feasible to allocate costs to the service: D. Useful in supporting access negotiations: E. Regulatory costs in specifying a reference:	No Yes Yes N/A Low Non-reference service due to low demand (compared to the substitutable reference service)
OTHER METER SERVICES				
Meter Retake and Test	Used to initiate a meter test to see if falls within allowable limits.	Quantity pa: 10 Revenue pa (\$M): 0.00	A. Sought by a significant part of the market: B. Service is substitutable: C. Feasible to allocate costs to the service: D. Useful in supporting access negotiations: E. Regulatory costs in specifying a reference:	No No Yes N/A Low Non-reference service due to low demand
Remove meter set and make safe	By quotation removal of non-standard meter or meter set ≥ 18 m ³ /hr This service is available at delivery points receiving the A1, A2 or B1 haulage service.	Quantity pa: 8 Revenue pa (\$M): By quote	A. Sought by a significant part of the market: B. Service is substitutable: C. Feasible to allocate costs to the service: D. Useful in supporting access negotiations: E. Regulatory costs in specifying a reference:	No No Yes N/A Low Non-reference service due to low demand and high variability in costs to undertake work
Additional metering information - install telemetry or pulse head	Services for meter set including the installation of telemetry device and pulse application	Type of service and cost varies	A. Sought by a significant part of the market: B. Service is substitutable: C. Feasible to allocate costs to the service: D. Useful in supporting access negotiations: E. Regulatory costs in specifying a reference:	No No Yes N/A Low Non-reference service due to expected low demand and high variability of costs to undertake work
ALTER DELIVERY SERVICES				
Alter meter position and/or gas service pipe	Alter the position of an existing meter and or gas service pipe on a property at the request of a customer	Quantity pa: 490 Revenue pa (\$M): 0.31	A. Sought by a significant part of the market: B. Service is substitutable: C. Feasible to allocate costs to the service: D. Useful in supporting access negotiations: E. Regulatory costs in specifying a reference:	No No Yes N/A Low Non-reference service due to low demand and high variability of costs to undertake work

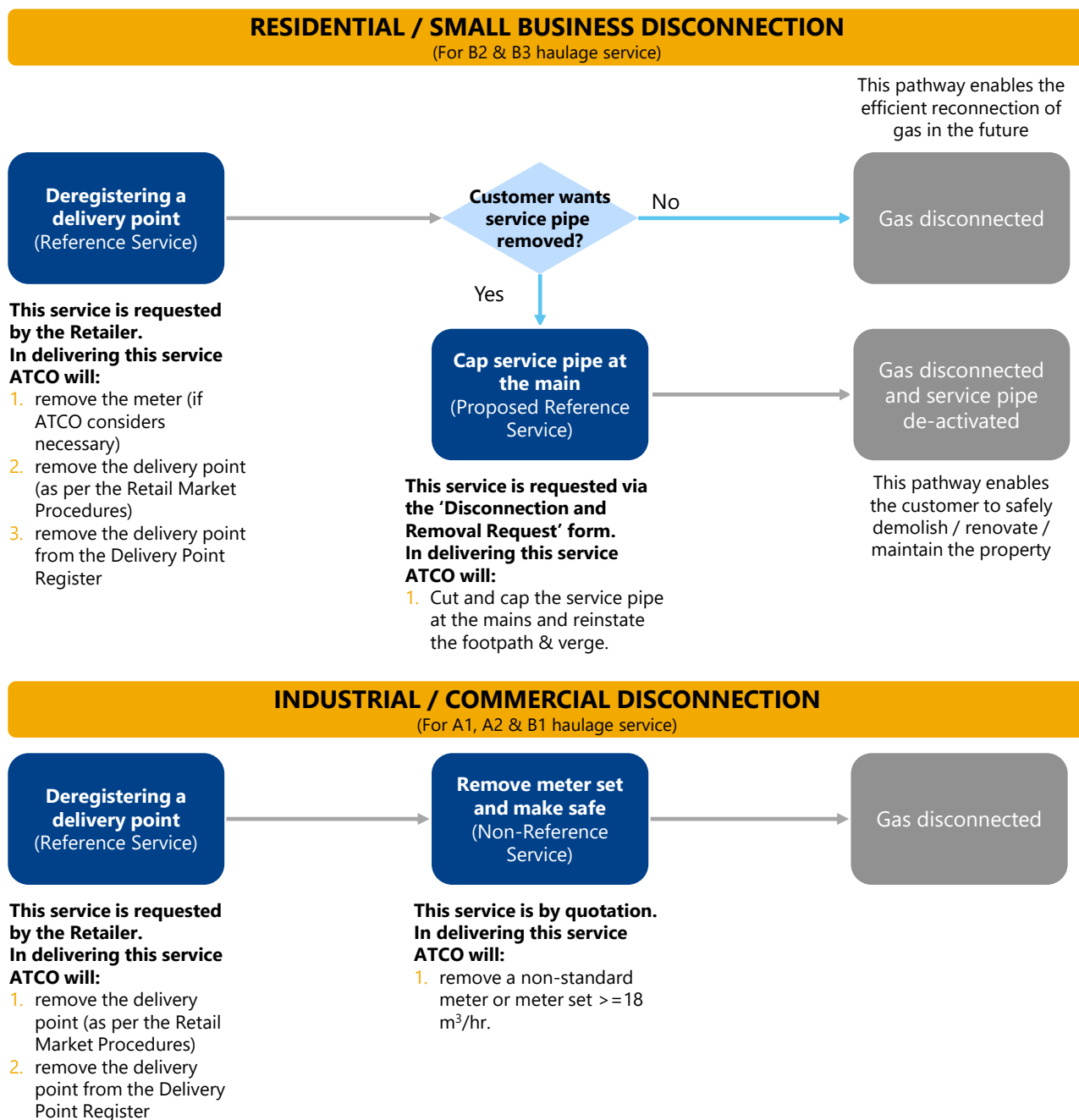
NON-REFERENCE SERVICE	DESCRIPTION	INDICATIVE ANNUAL SERVICE USAGE <i>(from relevant period)</i> ⁹	REFERENCE SERVICE FACTORS	AA6 SERVICE PROPOSAL
Upgrade meter pressure ≤2.75Kpa	Regulator change over: <ul style="list-style-type: none"> Residential B3 - 1.25 kPa to 2.75 kPa Commercial B2 - 1.25 kPa to 2.75 kPa This service is available at delivery points receiving the B2 or B3 haulage service.	Quantity pa: 647 Revenue pa (\$M): 0.14	A. Sought by a significant part of the market: No B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand
Upgrade meter pressure > 2.75Kpa	Commercial B2 - 2.75 kPa to 5.00 kPa This service is available at delivery points receiving the B2 haulage service.	Quantity pa: 1 Revenue pa (\$M): 0.00	A. Sought by a significant part of the market: No B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand and high variability of costs to undertake work
Upgrade meter up to M18AL	Upgrading of existing meter: <ul style="list-style-type: none"> Upgrading meter B3 to B2 to M12AL Upgrading meter to M18AL for domestic use 	Quantity pa: 63 Revenue pa (\$M): 0.03	A. Sought by a significant part of the market: No B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand
Upgrade to non-standard meter	Replace existing meter with a new meter of higher capacity	Quantity pa: 14 Revenue pa (\$M): 0.00	A. Sought by a significant part of the market: No B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand
Emergency change over	Used to initiate an urgent new line of main connection to facilitate a customer switching from an electric to a gas hot water system for residential customers. This service is available at delivery points receiving the B3 haulage service.	Quantity pa: 40 Revenue pa (\$M): 0.00	A. Sought by a significant part of the market: No B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand

NON-REFERENCE SERVICE	DESCRIPTION	INDICATIVE ANNUAL SERVICE USAGE <i>(from relevant period)</i> ⁹		REFERENCE SERVICE FACTORS	AA6 SERVICE PROPOSAL
Mains extension - single	Mains extensions for a single customer	Quantity and revenue variable	10 0.1	A. Sought by a significant part of the market: No B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: Low	Non-reference service due to low demand and high variability of costs to undertake work
OTHER SERVICES THAT THE SERVICE PROVIDER AGREES TO PROVIDE					
Other which the Service Provider agrees to provide	Any other service requested by a retailer or customer that may arise during AA6	Dependent on services requested	N/A	A. Sought by a significant part of the market: No B. Service is substitutable: No C. Feasible to allocate costs to the service: Yes D. Useful in supporting access negotiations: N/A E. Regulatory costs in specifying a reference: N/A	Non-reference service due to expected low demand and high variability of costs to undertake work

A3. DISCONNECTION PROCESS

The following diagram shows the current disconnection process for residential, small business, industrial, and commercial customers. In AA6, we will make the 'Cut and cap service pipe at main' a reference service. In making this change we expect to maintain our current process that requires the 'Deregistering a delivery point service to be sought in conjunction with the 'Cut and cap service pipe at main' service.

Figure A3.1: Gas disconnection process



A4. INFORMATION COMPLIANCE REQUIREMENTS

To ensure our Reference Service Proposal complies with the requirements of NGR we have developed a compliance checklist based on section 5 and Appendix 4 of the ERA's 2022 Gas Access Arrangement Guideline. Table A4.1 cross-references the NGR against the applicable section within the Reference Service Proposal that addresses the requirement.

Table A4.1: Compliance Checklist – Reference Service Proposal requirements

PROVISION	NGR REQUIREMENT	OUR REFERENCE SERVICE PROPOSAL REFERENCE
47A (1) (a)	Proposal identifies the pipeline to which it relates, including a reference to a website where a description of the pipeline can be reviewed.	Refer to Section 1
47A (1) (b)	Proposal sets out all the pipeline services that the service provider can reasonably provide by means of the pipeline, including a description of each of the services.	Refer to Sections 3 and 4 and Appendix A
47A (1) (c)	Proposal identifies, from the list of pipeline services that the service provider can reasonably provide, at least one service to be specified as a reference service.	Refer to Section 4 and Appendix A1
47A (1) (d)	Where the service provider has engaged with pipeline users in developing its proposal, proposal describes any feedback from those users about which pipeline services should be specified as a reference service.	Refer to Section 2