

HSBC Building
Level 19
580 George Street
Sydney NSW 2000
PO Box R41
Royal Exchange NSW 1225

Phone 61 2 9693 0000
Fax 61 2 9693 0093
www.apa.com.au

APA Group

Australian Pipeline Ltd
ACN 091 344 704

Australian Pipeline Trust
ARSN 091 678 778

APT Investment Trust
ARSN 115 585 441

East Australian Pipeline Pty Limited (EAPL)
ABN 33 064 629 009

30 January 2014

Ms Karen Olesnicky
Executive General Manager, Financial and Business Services
Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

BY EMAIL

Dear Ms Olesnicky,

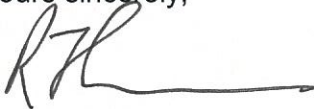
FY15 MOS Costs Estimate for Moomba to Sydney Pipeline - MSP

APA Group (APA) hereby submits in the attached its estimate of costs for the period 1 July 2014 to 30 June 2015, which relate to the provision of MOS Allocation Services on the Moomba to Sydney Pipeline (MSP).

APA's MOS costs forecast for the period to 30 June 2015 is estimated to be **\$76,265** (Refer Attachment 1 for more detail). APA believes that this amount satisfies all of the requirements for recoverability under Rule 424 of the NGR.

Please do not hesitate to contact John Jamieson on 07 3323 6023 or myself on 07 3323 6024 should you require any clarification or further information.

Yours sincerely,



Rod Johannessen

General Manager Strategy and Service Delivery

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Attachment 1:

APA Group – FY15 Cost Estimate for MOS Allocation Services - MSP

	INFORMATION REQUIRED BY AEMO	APA RESPONSE
(a)	The number of STTM pipelines operated by that STTM pipeline operator;	APA Group operates 2 STTM pipelines (RBP & MSP) however these pipelines are owned by two separate entities that both form part of the APA Group.
(b)	The number of STTM shippers and MOS providers on each STTM pipeline	RBP - 6 STTM Shippers of which 4 are MOS providers as at 30 January 2014, however all 6 are eligible MOS providers MSP – 6 STTM Shippers of which 3 are MOS providers as at 30 January 2014
(c)	Breakdown of Costs:	Estimate
	IT System Operation & Maintenance	\$21,099
	Labour	\$50,499
	Other Costs	\$ 1,559
	Interest	\$ 3,108
	Total APA MSP MOS Recovery	<u>\$76,265</u>
(d)	Allocation Agent Costs:	Not Applicable

APA Group – STTM MOS Costs Claim Explanatory Notes – MSP

Claim Components

APA Group's FY15 MOS cost estimate for the MSP is made up of 4 key components;

- **IT System Operation & Maintenance Costs** – Costs include proportion of external service provider annual maintenance charges as well as proportion of internal APA IT support staff dedicated to maintaining APA Grid systems.
- **Labour** – daily labour costs to process and verify STTM data, proportioned between MOS and non-MOS STTM activities. Costs include provision of 7 day week staff to monitor system processing, create manual backup files and verify STTM data before sending to AEMO. Internal escalation processes are in place to deal with any identified data abnormalities. Labour costs also include management time to review and maintain STTM related processes and backup systems, attend and review STTM CF information, monitor and audit daily processes and provide internal training.
- **Other Costs** – costs attributable to MSP STTM activities including travel, engineering and other miscellaneous charges, portioned between MOS and non-MOS STTM activities.
- **Interest Costs** – Interest costs have been calculated using cumulative monthly spend from when costs were incurred using an average post tax cost of debt for approved final Access Arrangement decisions that were made for both gas and electricity businesses over the same time period compounded monthly.

APA is unable to specifically track MOS and non-MOS costs given the complexity of reporting requirements and the impractical obligations that would have been placed on project members to do so. APA has used an allocation methodology to separate STTM costs into MOS and non-MOS components. The allocation of STTM costs between MOS and non-MOS has been estimated based on the approximate ratio of STTM reporting obligations that was established during previous MOS costs processes with 45% of attributable STTM costs being allocated to MOS.