

Queensland Competition Authority

Draft determination

Aurizon Network's Concept Study DAAU

December 2022

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SUBMISSIONS

Closing date for submissions: 27 January 2023

This document is a draft only and subject to revision. Public involvement is an important element of the decision-making processes of the QCA. Therefore, submissions are invited from interested parties concerning its assessment of Aurizon Network's Concept Study DAAU. The QCA will take account of all submissions received within the stated timeframes.

Submissions, comments or inquiries regarding this paper should be directed to:

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Confidentiality

In the interests of transparency and to promote informed discussion and consultation, the QCA intends to make all submissions publicly available. However, if a person making a submission believes that information in the submission is confidential, that person should claim confidentiality in respect of the document (or the relevant part of the document) at the time the submission is given to the QCA and state the basis for the confidentiality claim.

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Claims for confidentiality should be clearly noted on the front page of the submission. The relevant sections of the submission should also be marked as confidential, so that the remainder of the document can be made publicly available. It would also be appreciated if two versions of the submission (i.e. a complete version and another excising confidential information) could be provided.

A confidentiality claim template is available on request. We encourage stakeholders to use this template when making confidentiality claims. The confidentiality claim template provides guidance on the type of information that would assist our assessment of claims for confidentiality.

Public access to submissions

Subject to any confidentiality constraints, submissions will be available for public inspection at our Brisbane office, or on our website at www.qca.org.au. If you experience any difficulty gaining access to documents please contact us on (07) 3222 0555.

1 BACKGROUND

1.1 Aurizon Network's Concept Study DAAU

The 2017 access undertaking (UT5) sets out a process to identify and resolve capacity deficits across the central Queensland coal network (CQCN). See Box 1 for further explanation of the current UT5 process for addressing capacity deficits.

Aurizon Network has submitted a draft amending access undertaking (the Concept Study DAAU) that seeks to amend this process. Specifically, Aurizon Network's Concept Study DAAU seeks to provide for:

- Aurizon Network to recommend that a concept study be undertaken on a proposed expansion before the independent expert makes its recommendation to the QCA¹
- the independent expert to make a recommendation, and the QCA to make a determination, that Aurizon Network undertake various expansion studies (i.e. a concept study, a pre-feasibility study or a feasibility study) and for the implementation of other transitional arrangements to not be delayed as a result²
- Aurizon Network to recover the reasonable costs of any expansion study it is required to undertake as part of this process³
- the independent expert to make a recommendation, and the QCA to make a determination, to stage the implementation of transitional arrangements, including whether they are to be implemented in the future, at different times, or when certain conditions arise⁴
- the independent expert to have regard to other factors in making its recommendation, including forecast demand for capacity and an annual capacity assessment⁵
- the independent expert to recommend, and the QCA to make a determination, to not address all of the existing capacity deficit (ECD).⁶

¹ Concept Study DAAU, cl. 7A.5(a)(iii)(E).

² Concept Study DAAU, cls. 7A.5(ba),(bb),(ea),(n)).

³ Concept Study DAAU, cl. 7A.5(ba),(bd).

⁴ Concept Study DAAU, cl. 7A.5(m).

⁵ Concept Study DAAU, cl. 7A.5(d).

⁶ Concept Study DAAU, cl. 7A.5(m).

Box 1 UT5 process for addressing capacity deficits

UT5 includes a process to identify and resolve capacity deficits across the CQCN.

As part of this process, the independent expert is to undertake an initial capacity assessment report (ICAR) and identify whether an existing capacity deficit (ECD)⁷ exists for each coal system.

Where the independent expert's initial capacity assessment reveals an ECD in a coal system, UT5 requires:

- Aurizon Network to consult with relevant stakeholders to identify and consider which transitional arrangements could effectively and efficiently address an identified ECD, or whether affected parties would prefer not to do anything to address an ECD⁸
- Aurizon Network to submit a detailed report showing the outcome of its analysis and consultation on the ECD and outlining the transitional arrangements it considers would most effectively and efficiently address an ECD⁹
- the independent expert to review Aurizon Network's report and make a recommendation to the QCA with respect to which of the transitional arrangements it considers will most effectively and efficiently resolve an ECD, where end users and Aurizon Network do not reach an agreement¹⁰
- the QCA to make a determination as to which of the transitional arrangements will most efficiently and effectively resolve an ECD.¹¹

Aurizon Network must do everything reasonably necessary to implement the transitional arrangements determined by the QCA in a prudent and diligent manner to resolve an ECD.¹²

1.2 Overview of our assessment process

On 8 June 2022, Aurizon Network submitted the Concept Study DAAU under s. 142 of the *Queensland Competition Authority Act 1997* (QCA Act).¹³

In accordance with s. 143 of the QCA Act, we provided stakeholders with an opportunity to comment on the Concept Study DAAU and received three submissions, from Bravus Mining and Resources (Bravus), Glencore and the Queensland Resources Council (QRC). They did not object to the Concept Study DAAU providing for:

- expansion studies to be undertaken, and taken into consideration, when determining the transitional arrangements that will most efficiently and effectively resolve an ECD
- the staged implementation of the transitional arrangements that will most efficiently and effectively resolve an ECD.

⁷ An ECD occurs where the deliverable network capacity of a coal system is less than the number of train paths required to meet train service entitlements.

⁸ UT5, cl. 7A.5(a)(ii).

⁹ UT5, cl. 7A.5(a)(iii).

¹⁰ UT5, cl. 7A.5(d).

¹¹ UT5, cl. 7A.5(e).

¹² UT5, cl. 7A.5(f).

¹³ In accordance with s. 142 of the QCA Act, we must consider Aurizon Network's Concept Study DAAU and either approve, or refuse to approve, it.

However, all three submissions identified concerns with elements of Aurizon Network's proposed drafting amendments.¹⁴

We released a position paper after considering the submissions received and having regard to the relevant statutory criteria. Our preliminary view outlined that we were minded to refuse to approve the Concept Study DAAU and encouraged collaboration between stakeholders on further drafting amendments where opportunities to reach consensus arise.

In response to our position paper, Aurizon Network submitted revised drafting to the Concept Study DAAU. The revised drafting was developed in consultation with customers, with the parties agreeing on almost all of the revised drafting. We also received submissions from Bravus, Glencore and the QRC, which identified some matters of concern in relation to Aurizon Network's revised drafting.

If we refuse to approve Aurizon Network's Concept Study DAAU, we must provide a written notice stating the reasons for the refusal and the way in which we consider it is appropriate to amend Aurizon Network's Concept Study DAAU.¹⁵ This draft determination outlines our views about the appropriateness of Aurizon Network's Concept Study DAAU, as well as Aurizon Network's revised drafting.

In making this draft determination, we have had regard to the matters mentioned in s. 138(2) of the QCA Act and have considered all views presented in stakeholder submissions received during our investigation.

1.3 Next steps

We invite written submissions from interested parties by 27 January 2023. We will take all submissions made by this date into consideration before we make our determination on Aurizon Network's Concept Study DAAU.

This draft determination is intended to give stakeholders an insight into that view before we finalise our position.¹⁶ The way we apply statutory assessment criteria, and our thinking, may change in response to any submissions we receive on this paper.

¹⁴ See Bravus, sub. 2; Glencore, sub. 3; QRC, sub. 4.

¹⁵ In accordance with s. 142(3) of the QCA Act.

¹⁶ This paper is not a draft version of a final decision, and it has no force of itself. There should be no expectation that these views and recommendations will prevail to the end of the decision-making process.

2 OUR DRAFT DETERMINATION

Our draft determination is to refuse to approve the Concept Study DAAU, having regard to the relevant statutory criteria, and after considering the stakeholder submissions we received.

We consider it appropriate for UT5 to provide for further expansion studies to be undertaken, and taken into consideration, when determining the transitional arrangements that will most efficiently and effectively resolve an ECD.¹⁷ We also consider it appropriate for UT5 to provide for the staged implementation of the transitional arrangements.

However, having regard to the statutory criteria, we do not consider it is appropriate to approve the Concept Study DAAU as initially proposed.

The Concept Study DAAU restricts the independent expert's and our consideration of potential transitional arrangements to only those arrangements proposed by Aurizon Network. We consider that does not promote the efficient investment in the CQCN and is not in the interests of access holders. In particular, the Concept Study DAAU proposes introducing 'AN Proposed Transitional Arrangements' into the process and as a defined term. This would result in a process where the independent expert is only able to consider those transitional arrangements that Aurizon Network proposed.

Aurizon Network considered that the independent expert's recommended transitional arrangement must be made from the range of transitional arrangements included within Aurizon Network's detailed report (or supplementary detailed report).¹⁸

However, we do not consider it appropriate to confine the independent expert's or our consideration of potential transitional arrangements to only those that Aurizon Network proposed. We consider that providing for the independent expert to consider transitional arrangements beyond those that Aurizon Network proposed will establish a more robust assessment process, which promotes efficient investment in the CQCN.

Furthermore, where the independent expert considers there is a more effective and efficient transitional arrangement than those Aurizon Network recommended¹⁹, it is not clear that the Concept Study DAAU provides for the independent expert to make a recommendation to resolve an ECD.

We also consider it appropriate that the Concept Study DAAU be amended to provide further clarification as to the process for undertaking and considering expansion studies. In this regard, we consider it appropriate to clarify that:

- a concept study Aurizon Network is required to undertake under clause 7A.5 should only include a pre-feasibility study execution plan where this is necessary. We consider this

¹⁷ We note that in developing recommended transitional arrangements, Aurizon Network identified alternatives that it considered could assist in resolving the ECD, but it considered further information would be required to properly assess the potential costs, benefits and risks. Aurizon Network, *Detailed Response to the Initial Capacity Assessment Report*, March 2022.

¹⁸ Aurizon Network, sub. 6, p. 2.

¹⁹ The underlying information and modelling assumptions Aurizon Network uses in considering and proposing transitional arrangements may differ from those the independent expert used in making its recommendation. This may result in Aurizon Network and the independent expert forming different conclusions on the effectiveness and efficiency of particular transitional arrangements.

condition has the potential to reduce the expansion study costs for the relevant parties and is therefore in the legitimate business interests of Aurizon Network and access holders²⁰

- the process for us to make a determination for Aurizon Network to undertake a concept study will be triggered by any such recommendation by the independent expert.²¹ We consider it is in the interests of access holders to ensure:
 - a consistent approach is followed for undertaking and considering any concept study required as part of this process
 - any consideration of a concept study will form part of a greater process to establish how Aurizon Network is to resolve an ECD.

2.1 Aurizon Network's revised drafting to the Concept Study DAAU

In considering the way in which it is appropriate to amend Aurizon Network's Concept Study DAAU, we have had regard to Aurizon Network's proposed revised drafting to the Concept Study DAAU (revised drafting)²².

It is our view that Aurizon Network's revised drafting would be appropriate to approve having regard to the matters mentioned in section 138(2) of the QCA Act.

The revised drafting has been developed in conjunction with end users, and has largely been agreed between Aurizon Network and those users. We consider the amendments outlined in Aurizon Network's revised drafting are appropriate to approve to the extent that these provide for processes that promote economically efficient investment in the CQCN and are in the interests of Aurizon Network, access holders and access seekers. This includes:

- retaining a process within UT5 for implementing effective and efficient arrangements to resolve ECDs identified across the CQCN
- providing for further expansion studies to be undertaken, and taken into consideration, when determining the transitional arrangements that will most efficiently and effectively resolve an ECD
- providing for Aurizon Network to recover the prudent and efficient costs of undertaking an expansion study where required under a UT5 process (regardless of whether that expansion proceeds) and so enabling Aurizon Network to recover the efficient costs of providing access to the service
- clarifying that a concept study required under clause 7A.5 should only include a pre-feasibility study execution plan where this is necessary, which can reduce the expansion study costs for the relevant parties
- providing for the staged implementation of the transitional arrangements, whereby transitional arrangements may be implemented in the future and at different times, and so

²⁰ The proposed drafting amendments in the Concept Study DAAU reflect that a pre-feasibility study execution plan will not always be required as part of a concept study undertaken as part of the ECD process (see Concept Study DAAU, cl. 7A.5 (ba), (bb)). However, the definition of concept study (see Part 12 of UT5), which was developed for use under Part 8 arrangements, requires that a concept study include a pre-feasibility study execution plan.

²¹ The Concept Study DAAU does not specifically outline the process for considering a concept study that is recommended following Aurizon Network's supplementary detailed report.

²² See Aurizon Network, sub. 6, Appendix A, pp. 4-20.

may enable investment in capacity of the CQCN to be more reflective of access holders' demand for the service

- providing for the independent expert to recommend, and for us to determine, not to address an ECD in full, or until certain conditions arise. This promotes efficient investment in the CQCN, noting:
 - the capacity benefits obtained from certain transitional arrangements may rely on the prior implementation of other transitional arrangements
 - costs associated with providing additional capacity may be inefficient where demand for the additional capacity does not warrant further investment
- providing for the independent expert to propose an alternative solution to that being proposed by Aurizon Network, where it considers the alternative solution will most efficiently and effectively resolve an ECD
- providing for the independent expert to consider the most recent annual capacity assessment when making a recommendation in relation to which proposed transitional arrangements it considers will most effectively and efficiently resolve the ECD.²³ This will provide for more informed decisions²⁴ as to whether transitional arrangements are efficient and effective in addressing an ECD
- clarifying that the pricing principles to apply to an expansion undertaken to resolve an ECD are set out in Part 6 and Schedule F of UT5. These pricing principles provide a framework for the appropriate allocation of costs between the relevant parties and are consistent with the pricing principles set out in section 168A of the QCA Act.²⁵

Aurizon Network considered that the revised drafting provides a staged review process that better reflects the intent of the UT5 agreement. Aurizon Network submitted that it provides a pragmatic process to identify and consider those transitional arrangements that could effectively and efficiently address any ECD, without introducing additional complexity into the process.²⁶

The QRC supported Aurizon Network's revised drafting, with the exception of those matters which it considered were of concern.²⁷

We have considered those concerns raised by stakeholders in making this draft determination. Our consideration of these matters is set out below.

²³ Aurizon Network's revised drafting does not specify that the independent expert's recommendation is to have regard to forecast demand. Bravus submitted that it would only support consideration of forecast demand in this context when the access undertaking and commercial processes support the ready transfer of capacity between the GAPE and Newlands systems (Bravus, sub. 5, p. 4).

²⁴ The annual capacity assessment will provide up-to-date analysis of the deliverable network capacity.

²⁵ Bravus requested that we consider providing a definitive view on the historical root cause of the Newlands and GAPE ECD and corresponding financial account of related transitional arrangements. In this regard, Bravus considered that GAPE project users should be held to account for rectifying the project's capacity shortfall and for the corresponding transitional arrangements to rectify the ECD in keeping with their commercial and regulatory obligations (Bravus, sub. 5, pp. 1–3). We consider that the amendments being considered as part of this draft determination primarily relate to the process for addressing an ECD. Assessing specific cost allocation matters will be considered in accordance with the ongoing processes in UT5 (including in applying the pricing principles to an expansion).

²⁶ Aurizon Network, sub. 6, pp. 3–5.

²⁷ QRC, sub. 7, pp. 1–2.

Fee-free relinquishments

Aurizon Network's revised drafting to the Concept Study DAAU only provides for fee-free relinquishments²⁸ where the relinquishment is offered prior to Aurizon Network's detailed report proposing transitional arrangements to address an ECD. This is consistent with the current arrangements in UT5. Aurizon Network did not consider it appropriate to provide further opportunities for fee-free relinquishments to access holders.²⁹

The QRC submitted that its members are, generally, of the view that not providing further opportunities for fee-free relinquishments may be too restrictive.³⁰ The QRC proposed amendments to Aurizon Network's revised drafting that provide for further fee-free voluntary relinquishments where we determine an access holder may do so.³¹

Glencore considered that not allowing fee-free relinquishments but still progressing expansion projects for committed capacity without demand would be inefficient. Glencore submitted that not considering demand reductions may result in wasted capital spend and higher costs.³²

We do not consider that Aurizon Network's revised drafting necessarily provides for expansion projects to be progressed without demand for the additional capacity. Aurizon Network's revised drafting provides for:

- affected access holders and customers to advise Aurizon Network that they would prefer not to do anything to address a remaining ECD (see cl. 7A.5(n)(iii))
- the independent expert to recommend, and us to make a determination, to not address some or all of an ECD (or not do so until certain conditions are met) (see cl. 7A.5(bb)).³³

Furthermore, UT5 enables an access holder to transfer its access rights to an access seeker that would otherwise require an expansion to obtain access rights.

Glencore submitted that producers transferring excess capacity to access seekers is not always achievable (e.g. the timing of demand may not align, or demand levels may be for a different amount of capacity). Glencore considered that even where an access seeker is able to transfer excess capacity, existing access holders will continue to wear the consequences of an ECD.³⁴

In any case, we do not consider that providing for fee-free relinquishments will prevent inefficient expansions being undertaken. As outlined by Aurizon Network, if access rights are relinquished and not transferred, access seekers will require an expansion that would likely involve the same or an equivalent expansion as contemplated in rectifying the ECD.³⁵

²⁸ Fee-free relinquishments refers to situation where an access holder is able to voluntarily relinquish access rights without paying the relinquishment fee.

²⁹ Aurizon Network, sub. 6, p. 4 and sub. 6, appendix A, pp. 17–18. Aurizon Network noted that access holders have already been provided with an opportunity for fee-free relinquishments as part of the consultation period in establishing the transitional arrangements to be considered.

³⁰ Bravus did not support this view for the Newlands System. Bravus did not believe any new or modified relinquishment processes are necessary or justified (Bravus, sub. 5, pp. 1–2). Bravus also submitted that no new fee-free relinquishments should be approved in the Newlands system (Bravus, sub. 8, pp. 1–3).

³¹ QRC, sub. 7, pp. 2–3 and sub. 7, attachment 1, pp. 14–15.

³² Glencore, sub. 10, p. 2. Glencore noted that over a multi-year horizon, it is certainly within the normal planning process for a producer's mine plans or washing strategies to change and thereby result in it holding excess contracted capacity.

³³ Aurizon Network, sub. 6, appendix A, pp. 8, 14.

³⁴ Glencore, sub. 10, p. 2.

³⁵ Aurizon Network, sub. 6, p. 4.

We also consider that continually allowing for fee-free relinquishments throughout the staged process for resolving an ECD may, in certain instances, have adverse implications for access seekers (as future access holders). Fee-free relinquishments have the potential to increase access charges for remaining access holders.³⁶ Furthermore, fee-free relinquishments do not necessarily incentivise access holders to be accurate and transparent about their demand requirements when the scope of an expansion is being considered. Aurizon Network considered that the risk of progressing unnecessary expansion options can be mitigated where access holders provide accurate and transparent demand forecasts to inform the scope of any expansion studies.³⁷

Relevantly, the process for addressing an ECD as outlined in Aurizon Network's revised drafting does not prevent relinquishments by affected end users. UT5 provides for access holders to relinquish access rights at any time.³⁸

Process for considering alternative solutions identified by the independent expert

Aurizon Network's revised drafting provides for the independent expert to propose alternative solutions for Aurizon Network's analysis in some circumstances (see cl. 7A.5(q)).

The QRC noted that this provision has been substantially agreed during consultation but proposed minor drafting amendments to clarify:

- that the independent expert's alternative solution is for Aurizon Network's analysis
- the process to be applied if Aurizon Network is of the view that the independent expert's alternative solution is suitable (the QRC considered there is no provision for what happens if Aurizon Network is of the view that the independent expert's alternative solution is suitable).³⁹

We do not consider that further clarification is required in relation to these matters. In this regard, Aurizon Network's revised drafting outlines that:

- Aurizon Network is to analyse the independent expert's alternative solution and come to a view as to whether it is a suitable alternative transitional arrangement (see cl. 7A.5(q))
- the independent expert must review the supplementary detailed report and promptly make a recommendation with respect to which proposed transitional arrangements it considers will most effectively and efficiently resolve the remaining ECD (see cl. 7A.5(n)(vi)).⁴⁰

Therefore, we consider that Aurizon Network's revised drafting outlines a process to be followed where Aurizon Network is of the view that the independent expert's alternative solution is suitable.

Addressing an expansion capacity deficit

Aurizon Network's revised drafting outlines certain steps that Aurizon Network must follow once it has completed a relevant study for an expansion (see cl. 7A.5(n)). This includes providing a supplementary detailed report that, amongst other things, is to make a recommendation as to

³⁶ As noted by Bravus, permanently extinguish system nameplate capacity in the Newlands system will lead to an increase in the Newlands system tariffs for remaining users. If the same surplus capacity would otherwise be dealt with under UT5 (relinquishments under cl. 7.4.8 and capacity resumption under cl. 7.6) there would be no increase to system tariffs (Bravus, sub. 2, p. 4).

³⁷ Aurizon Network, sub. 6, p. 4.

³⁸ UT5, cl. 7.4.8.

³⁹ QRC, sub. 7, pp. 3–4, sub. 7, attachment 1, pp. 12–13.

⁴⁰ Aurizon Network, sub. 6, appendix A, pp. 10, 12.

whether one or more of the expansions that is the subject of the relevant study should be implemented. Where Aurizon Network and all affected users agree to an expansion to address any remaining ECD, the revised drafting does not oblige Aurizon Network to follow each of these steps (see 7A.5(n)(v)(C)).⁴¹

The QRC submitted that it is concerned that there is potential for this to result in a portion of an ECD not being resolved (that is, if the expansion does not address all of the remaining ECD).⁴² The QRC proposed drafting amendments so that clause 7A.5(n) of Aurizon Network's revised drafting would apply to any remaining ECD that will not otherwise be addressed pursuant to clause 8.9.4 of UT5.⁴³

Aurizon Network submitted there is no justification for a change to the Concept Studies DAAU in that regard.⁴⁴

Where Aurizon Network undertakes an expansion to address an ECD, there is a risk that the resulting deliverable network capacity created by an expansion will be less than the ECD required to be addressed by the expansion (i.e. an expansion capacity deficit). Clause 8.9.4 of UT5 outlines a clear process for how any such deficit resulting from a specific expansion is to be dealt with.

The process outlined in clause 7A.5 of UT5 sets out to identify and resolve capacity deficits across the CQCN. We do not consider it necessary to introduce additional provisions into this process to deal with the situation where an expansion creates less deliverable network capacity than expected. This is not the intention of this particular process, and we consider that clause 8.9.4 of UT5 is sufficient for addressing any such deficit resulting from a specific expansion.

We also do not consider it is in Aurizon Network's legitimate business interests to require that an expansion capacity deficit be addressed through the process outlined in clause 7A.5 of UT5. The process for addressing an expansion capacity deficit in clause 8.9.4 of UT5 gives Aurizon Network relief from any further expansion obligation where the independent expert confirms Aurizon Network has complied with its obligations to undertake that expansion.⁴⁵ As outlined by Aurizon Network, the QRC's proposed amendments have the effect of removing this protection for Aurizon Network.⁴⁶

We also note that the revised drafting does not oblige Aurizon Network to follow each of these steps in cl. 7A.5(n) only in those circumstances where all affected users agree to an expansion to address any remaining ECD.

Potential implications of interpretation of 'report date'

The QRC submitted that the report date definition⁴⁷ should be interpreted in accordance with the current approved undertaking and should not be affected by Aurizon Network's revised drafting. The QRC proposed amendments to Aurizon Network's revised drafting that it considered better reflected the language in UT5.⁴⁸

⁴¹ Aurizon Network, sub. 6, appendix A, pp. 7–9.

⁴² QRC, sub. 7, p. 3.

⁴³ QRC, sub. 7, attachment 1, p. 9.

⁴⁴ Aurizon Network, sub. 9, p. 2.

⁴⁵ UT5, cl. 8.9.4(g)(i).

⁴⁶ Aurizon Network, sub. 9, p. 2.

⁴⁷ The 'report date' is a defined term in UT5.

⁴⁸ QRC, sub. 7, p. 3, sub. 7, attachment 1, p. 4.

We do not consider that Aurizon Network's revised drafting affects the interpretation of the report date definition.⁴⁹ We note that the report date is clearly defined in UT5⁵⁰ and has already passed.

⁴⁹ We are currently considering the appropriate interpretation of the report date as part of separate regulatory processes.

⁵⁰ See UT5, Part 12.

LIST OF SUBMISSIONS

We have received the following submissions during our investigation of Aurizon Network's Concept Study DAAU. The submission numbers below are used in this draft determination for referencing purposes. The submissions are available on the QCA website.

<i>Stakeholder</i>	<i>Sub. no.</i>	<i>Submission</i>	<i>Date</i>
Aurizon Network	1	Concept Study DAAU supporting submission	8 June 2022
	6	Submission in response to the QCA's preliminary position	4 November 2022
	9	Submission in response to the QRC's submission	7 November 2022
Bravus	2	Submission on Aurizon Network's Concept Study DAAU	21 July 2022
	5	Submission in response to the QCA's preliminary position	7 October 2022
	8	Submission on Aurizon Network's revised drafting	4 November 2022
Glencore	3	Submission on Aurizon Network's Concept Study DAAU	21 July 2022
	10	Submission on Aurizon Network's revised drafting	8 November 2022
QRC	4	Submission on Aurizon Network's Concept Study DAAU	21 July 2022
	7	Submission on Aurizon Network's revised drafting	4 November 2022