

# Queensland Competition Authority

Draft decision

---

## Queensland Rail's 2016 cost allocation manual

---

April 2017

---

## SUBMISSIONS

---

Closing date for submissions: 10 May 2017

This report is a draft only and is subject to revision. Public involvement is an important element of the decision-making processes of the Queensland Competition Authority (QCA). Therefore submissions are invited from interested parties concerning its assessment of Queensland Rail's proposed 2016 cost allocation manual.

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

Queensland Competition Authority  
GPO Box 2257  
Brisbane Q 4001  
Tel (07) 3222 0511  
Fax (07) 3222 0599  
[www.qca.org.au/submissions](http://www.qca.org.au/submissions)

### Confidentiality

In the interests of transparency and to promote informed discussion, the QCA would prefer submissions to be made publicly available wherever this is reasonable. However, if a person making a submission does not want that submission to be public, that person should claim confidentiality in respect of the document (or any part of the document). Claims for confidentiality should be clearly noted on the front page of the submission and the relevant sections of the submission should be marked as confidential, so that the remainder of the document can be made publicly available. It would also be appreciated if two copies of each version of these submissions (i.e. the complete version and another excising confidential information) could be provided. Where it is unclear why a submission has been marked 'confidential', the status of the submission will be discussed with the person making the submission.

While the QCA will endeavour to identify and protect material claimed as confidential as well as exempt information and information disclosure of which would be contrary to the public interest (within the meaning of the Right to Information Act 2009 (RTI)), it cannot guarantee that submissions will not be made publicly available.

As stated in s 239 of the Queensland Competition Authority Act 1997, the Authority must take all reasonable steps to ensure the information is not disclosed without the person's consent, provided the Authority believes that disclosure of the information would be likely to damage the person's commercial activities and that the disclosure of the information would not be in the public interest. Notwithstanding this, there is a possibility that the Authority may be required to reveal confidential information as a result of a RTI request.

### Public access to submissions

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

---

## Contents

---

SUBMISSIONS	II
Closing date for submissions: 10 May 2017	ii
Confidentiality	ii
THE ROLE OF THE QCA—TASK, TIMING AND CONTACTS	IV
1 BACKGROUND AND PROCESS	1
1.1 Queensland Rail network	1
1.2 Queensland Rail's cost allocation manual	2
1.3 Regulatory process	2
1.4 Key assessment criteria	3
1.5 Application of the key assessment criteria	3
2 ASSESSMENT OF QUEENSLAND RAIL'S 2016 COST ALLOCATION MANUAL	4
2.1 The regulatory framework supporting the cost allocation manual	4
2.2 Extensions to the scope of the cost allocation manual	5
2.3 Clarity of the cost allocation manual	7
APPENDIX A : SUNDRY ISSUES IN THE COST ALLOCATION MANUAL	10
REFERENCES	12

---

## THE ROLE OF THE QCA—TASK, TIMING AND CONTACTS

---

The Queensland Competition Authority (QCA) is an independent statutory authority which promotes competition as the basis for enhancing efficiency and growth in the Queensland economy.

The QCA's primary role is to prevent monopoly businesses operating in Queensland, particularly in the provision of key infrastructure, from abusing their market power through unfair pricing or restrictive access arrangements.

### Contacts

Enquiries regarding this project should be directed to:

ATTN: Graham Phelan

Tel (07) 3222 0511

[www.qca.org.au/Contact-us](http://www.qca.org.au/Contact-us)

# 1 BACKGROUND AND PROCESS

## 1.1 Queensland Rail network

Queensland Rail owns and operates a 6,500-kilometre rail network, including the commuter lines in south east Queensland, the West Moreton system, and the Mount Isa and North Coast systems (Figure 1). It also operates the state's suburban and long-distance passenger train services.

**Figure 1 Queensland Rail's network**



### Declaration for third party access

The services provided by Queensland Rail's intrastate rail network were declared by regulation in 1997, making the services subject to the third-party access provisions of the QCA Act. As a result of that declaration, Queensland Rail, access seekers and access holders gained rights and obligations relating to the negotiation of the terms and conditions of access to Queensland Rail's rail transport infrastructure.

On 11 October 2017, the QCA approved an access undertaking for Queensland Rail which sets out the rights and obligations of Queensland Rail in providing access to access seekers. The access undertaking and our related decision, among other things, approved a set of regulated tariffs for the West Moreton system and provided information on how these costs were calculated. The QCA did not prescribe regulated tariffs for the Mount Isa and North Coast systems, meaning that the costs of access were to be negotiated by access seekers and

Queensland Rail, or failing that, it was open for parties to seek for the QCA to arbitrate the dispute under the QCA Act.

However, having regard to stakeholder concerns, the QCA's final decision noted that it would be updating the cost allocation manual. A key purpose of this update was to require that Queensland Rail disclosed more information on the costs of service provision for systems not subject to regulated tariffs, namely the Mount Isa and the North Coast systems.<sup>1</sup>

## 1.2 Queensland Rail's cost allocation manual

The QCA's powers in respect of a cost allocation manual are contained in the QCA Act, which requires Queensland Rail to keep accounting records for the provision of below-rail infrastructure services (the below-rail financial statements). Further to the obligation under the QCA Act to prepare below-rail financial statements, Queensland Rail's 2016 Access Undertaking requires it to publish the audited statements within six months of the end of the financial year (clause 5.3.1(a)).

The purpose of a cost allocation manual is to provide a framework for identifying, attributing and allocating assets, costs, revenues and investments related to Queensland Rails' below-rail services, when preparing the below-rail financial statements.

The below-rail financial statements act to facilitate access to the below-rail infrastructure. This is particularly useful to those interested in the Mount Isa and North Coast systems, where reference tariffs do not apply.

## 1.3 Regulatory process

Queensland Rail submitted its proposed cost allocation manual for the QCA's consideration in December 2016. A key change in the cost allocation manual, compared with the previous manual approved by the QCA in 2013, is the separate disclosure of information related to the Mount Isa and North Coast systems. Previously, the cost allocation manual required Queensland Rail to separately identify information only relating to the West Moreton system.

The key milestones in the course of this process are as follows:

- 22 July 2016—The QCA made a request to Queensland Rail to prepare a revised cost allocation manual by 21 September 2016.<sup>2</sup>
- 18 August 2016—Queensland Rail requested an extension to 31 December 2016 to submit its cost allocation manual to the QCA.
- 9 September 2016—The QCA granted Queensland Rail an extension to 23 December 2016.
- 22 December 2016—Queensland Rail submitted its proposed cost allocation manual for the QCA's consideration.
- 17 February 2017—The period closed for lodging submissions on Queensland Rail's proposed cost allocation manual. The QCA received two submissions—from New Hope Group and Pacific National.

Stakeholders are invited to submit comment on this draft decision by **10 May 2017**.

---

<sup>1</sup> Queensland Competition Authority (QCA) 2016, *Queensland Rail's Draft Access Undertaking*, Decision.

<sup>2</sup> The QCA set out its expectation that the revised cost allocation manual separately identify information for each of the Mount Isa and North Coast systems. The QCA considered this would address stakeholder concerns raised as part of the QCA's recent decision on Queensland Rail's draft access undertaking.

## 1.4 Key assessment criteria

In reviewing Queensland Rail's cost allocation manual we have considered whether the cost allocation manual adequately deals with the allocation of costs. We have also taken account of Queensland Rail's existing accounting system for its below-rail services, consistent with section 159(3)(c) of the QCA Act.

### Consideration of the wider regulatory framework

When considering Queensland Rail's proposed cost allocation manual and the adequacy of how it allocates costs, we have had regard to the wider regulatory settings that apply to Queensland Rail's declared below-rail services. In particular, we have considered Queensland Rail's 2016 undertaking and its associated information disclosure requirements.

Information contained in the below-rail financial statements based on the cost allocation manual is a complement to, but not a substitute for, information contained in the QCA's 2016 final decision on Queensland Rail's 2016 undertaking. In particular, access seekers on the West Moreton system should consider the QCA's 2016 final decision on Queensland Rail's 2016 undertaking as a key source of information to understand the applicable reference tariff.

## 1.5 Application of the key assessment criteria

Our draft decision is to refuse to approve Queensland Rail's proposed cost allocation manual. We have reached this draft view having had regard to Queensland Rail's proposal, stakeholder submissions and our obligations under the QCA Act.

Our draft decision seeks to avoid creating unnecessary prescription in terms of Queensland Rail's cost allocation manual. In releasing our draft decision, we have also proposed drafting revisions to Queensland Rail's proposed cost allocation manual. These revisions seek to improve the usefulness of the information, and increase transparency, while avoiding imposing unnecessary costs on Queensland Rail.

In this regard, we note that the QCA has the ability under the QCA Act to revise Queensland Rail's cost allocation manual from time to time.

---

## 2 ASSESSMENT OF QUEENSLAND RAIL'S 2016 COST ALLOCATION MANUAL

---

*We have assessed a range of issues raised by stakeholders on Queensland RAILS proposed cost allocation manual.*

*We have grouped these issues into three categories relating to:*

- *the regulatory framework supporting the cost allocation manual*
- *extensions to the scope of the cost allocation manual*
- *clarity of the cost allocation manual.*

*Our draft decision is to refuse to approve Queensland Rail's proposed cost allocation manual. The sections below outline the reasons for our draft decision.*

*Appendix A contains a summary of other sundry issues and draft QCA comments.*

### 2.1 The regulatory framework supporting the cost allocation manual

Our draft decision is that Queensland Rail revise its proposed costing manual to include:

- an explicit purpose statement in section 1.3, namely:
  - This Manual also acts as a means of informing the audit and review processes required by the QCA.
  - The Financial Statements prepared using this Manual assist in providing for the information needs of the QCA and of access seekers who may seek to negotiate Access.
- a clause in section 2.3 to acknowledge the right of the QCA to revise the cost allocation manual:

2.3(d) The QCA may, from time to time, revise the Manual, as set out in s. 159 of the Act.

We consider that our draft additions to the purpose statement of the cost allocation manual will assist in clarifying the role of the manual, and the resulting below-rail financial statements. A clearer purpose statement in the cost allocation manual will assist in future audits and may assist in future reviews.

In addition, including a clause to acknowledge the QCA's right to revise the cost allocation manual from time to time will clarify and provide assurance to stakeholders of our role in maintaining the integrity and relevance of the cost allocation manual.



## Summary of issues

The key framework issues raised by stakeholders and QCA draft responses, are summarised in Table 1.

**Table 1 Framework issues**

<i>Stakeholder comment</i>	<i>QCA draft comment</i>
Pacific National considered the cost allocation manual should include an explicit purpose as a means to inform audit and review processes undertaken by the QCA. <sup>3</sup>	We agree with Pacific National's comment. Including a purpose statement to inform future audit and review processes may assist in future reviews of the cost allocation manual.
Pacific National considered that in the event the current Queensland Rail undertaking was extended, the cost allocation manual should also be extended or a new manual submitted. <sup>4</sup>	The QCA will make a decision on the suitability of the cost allocation manual if and when it extends the current Queensland Rail undertaking. We note that s. 159(2) of the QCA Act allows the QCA to revise the manual from time to time.
Pacific National noted that if the QCA ceased to be the regulator of Queensland Rail it might withdraw the cost allocation manual. It considered it would be more appropriate to keep the manual operational until the new regulator's processes were clear. <sup>5</sup>	The QCA cannot bind future potential legislative change through amendments to the cost allocation manual.
New Hope considered the cost allocation manual should acknowledge the QCA's right to require revisions to the cost allocation manual from time to time. <sup>6</sup>	We agree with New Hope's comment. We note that the QCA's right to revise the manual under s. 159(2) of the QCA Act is unaffected by the drafting of the cost allocation manual. Clarifying this matter will provide assurance to stakeholders on the QCA's role in maintaining the integrity of the cost allocation manual.
Pacific National considered that the QCA should consult with stakeholders on future non-trivial amendments to the cost allocation manual submitted by Queensland Rail. <sup>7</sup>	The QCA will make a decision on future consultation processes at that time. We note that s. 159(3) of the QCA Act states we may consult with stakeholders we consider appropriate in preparing or revising the cost allocation manual.

## 2.2 Extensions to the scope of the cost allocation manual

Our draft decision is that Queensland Rail revise its proposed cost allocation manual to include:

- a clause in section 3.3 to require the treatment of inter-company charges, agreements and transactions be fair and reasonable:
  - 3.3(k) compilation of the internal costing accounts must be fair and reasonable and reflect relevant underlying activity.
- a clause in section 4.5 to require the separation of below-rail investments to be fair and reasonable:
  - 4.5.2(e) notwithstanding clause 4.5.1, the classification of costs to Below Rail investment projects must be fair and reasonable and reflect relevant underlying activity.

<sup>3</sup> Pacific National, sub. 2: 1.

<sup>4</sup> Pacific National, sub. 2: 1.

<sup>5</sup> Pacific National, sub. 2: 1–2.

<sup>6</sup> New Hope, sub. 1: 1.

<sup>7</sup> Pacific National, sub. 2: 2.

- a clause in section 6.3 to require Queensland Rail to explain any differences in information reported through the below-rail financial statements and equivalent information reported through Queensland Rail's other obligations under the undertaking:
  - (ix) Provide a commentary which explains any differences between the information provided in the Financial Statements and the equivalent information provided pursuant to clauses 5.2.2(i)(i), 5.2.2(i)(ii), and 5.2.2(i)(iii) of the 2016 Undertaking.

We consider that adding these clauses will improve transparency and provide assurance to Queensland Rail's stakeholders that costs are allocated appropriately. It is appropriate that Queensland Rail bears responsibility for the fair and reasonable treatment of inter-company charges, agreements, transactions, and the separation of below-rail investments. It is also appropriate that Queensland Rail enables stakeholders to reasonably compare equivalent information across different sources.

We may review these clauses in the cost allocation manual, once we have seen their practical application in future below-rail financial statements published by Queensland Rail.

### Summary of issues

The key scope issues raised by stakeholders and the QCA draft responses are summarised in Table 2.

**Table 2 Extensions to the scope of the cost allocation manual**

<i>Stakeholder comment</i>	<i>QCA draft comment</i>
New Hope considered that the financial statements should separate revenue within the West Moreton system into coal and non-coal revenue, with revenue related to coal services further separated between access charges and other sources of revenue. <sup>8</sup>	New Hope's comment appears to be accommodated in Queensland Rail's below-rail financial statements. Queensland Rail's 2016 financial statements separate coal and non-coal revenue for the West Moreton System. Coal revenue is also separated by access charge and other revenue in note 9 to the statements. <sup>9</sup>
Pacific National suggested including a statement showing the proportion of identified and allocated costs in the below-rail financial statements. <sup>10</sup>	Pacific National's comment seems to be addressed in Queensland Rail's below-rail financial statements—i.e., note 7 includes a statement of identified and allocated costs. <sup>11</sup>
Pacific National suggested the expense element in the below-rail financial statements be further disaggregated to allow scrutiny of actual costs to below-rail services. <sup>12</sup>	Further refinement of the cost allocation manual is a potential area of consideration for future cost allocation manual proposals or revisions. At this time, we consider the proposed cost allocation manual amendments have improved the adequacy of cost allocation.
Pacific National considered that the cost allocation manual in sections 3.3 and 4.5 should require inter-company charges, agreements and transactions be fair and reasonable and should provide further information on these matters. <sup>13</sup>	We agree with Pacific National's comment. Including a 'fair and reasonable' principle will assist in providing transparency and assurance that costs are appropriately allocated. We note that note 5 of Queensland Rail's 2016 below-rail financial statements

<sup>8</sup> New Hope, sub. 1: 3.

<sup>9</sup> Queensland Rail 2016, *Financial statements for the year ended 30 June 2016 below rail services provided by Queensland Rail*.

<sup>10</sup> Pacific National, sub. 2: 2.

<sup>11</sup> Queensland Rail 2016, *Financial statements for the year ended 30 June 2016 below rail services provided by Queensland Rail*.

<sup>12</sup> Pacific National, sub. 2: 3.

<sup>13</sup> Pacific National, sub. 2: 2.

<i>Stakeholder comment</i>	<i>QCA draft comment</i>
	provides disclosure of aggregate internal charges. <sup>14</sup>
Pacific National considered the cost allocation manual should address how payments received by Queensland Rail from its insurers for derailment, collisions, floods, and third part damage should be taken into account. Pacific National considered insurance payments should be netted off costs. <sup>15</sup>	Queensland Rail has confirmed to the QCA that insurance payments received because of derailments, collisions, floods and third-party damage are netted off costs, as per section 4.2.1.1 of the cost allocation manual. <sup>16</sup>
New Hope considered cost information provided for the West Moreton system should be consistent across the cost allocation manual, information reported under cl. 5.2.2(i) of the undertaking, and the QCA's decision and Queensland Rail's model, which formed the basis of the reference tariffs. <sup>17</sup>	We address New Hope's comment in the section below.

### Consistency with undertaking

New Hope said that for the West Moreton system the overall package of information contained in the QCA's final decision on Queensland Rail's undertaking, the information reporting requirements under the undertaking itself, and the below-rail financial statements should be prepared on a consistent basis or be reconciled with each other.<sup>18</sup> This could involve ensuring the cost allocation manual was consistent with both the basis on which reference tariffs were developed, and the level of cost detail as required for the reports under clause 5.2.2(i) of the 2016 undertaking.

Our draft decision is to include a clause in the cost allocation manual requiring Queensland Rail to explain differences in equivalent information reported in the below-rail financial statements and that under clauses 5.2.2(i)(i), 5.2.2(i)(ii), and 5.2.2(i)(iii) of Queensland Rail's undertaking. We consider that this will improve the transparency of information provided by the below-rail financial statements to access seekers on systems where reference tariffs apply.

We note that the primary source of information for the West Moreton system is Queensland Rail's undertaking. As noted by New Hope, clause 5.2.2(k) of the 2016 undertaking requires Queensland Rail to explain the differences between forecast and actual costs for the West Moreton system. We consider this requirement should also provide a degree of transparency across the overall package of reported information.

That said, it is always open to the QCA to consider providing Queensland Rail with additional guidance on cost allocation in the cost allocation manual in the future if Queensland Rail is not adequately transparent in its disclosures under clause 5.2.2 of the 2016 undertaking.

## 2.3 Clarity of the cost allocation manual

Our draft decision is to revise Queensland Rail's proposed cost allocation manual to:

- amend the definition of Queensland Rail in part 7 of the proposed cost allocation manual to remove reference to a description of activities, and read as:

<sup>14</sup> Queensland Rail 2016, *Financial statements for the year ended 30 June 2016 below rail services provided by Queensland Rail*.

<sup>15</sup> Pacific National, sub. 2: 2-3.

<sup>16</sup> E-mail from Queensland Rail to the QCA, 17 March 2017.

<sup>17</sup> New Hope, sub. 1: 2-3.

<sup>18</sup> New Hope, sub. 1: 2-3.

"Queensland Rail" means Queensland Rail Limited [ABN 71 132 181 090] (formerly QR Passenger Pty), a corporation fully owned by a Government Statutory Authority.

- include a clause in section 3.2 of Queensland Rail's proposed cost allocation manual to explicitly require costs are not double-counted:

3.2(g) calculations and adjustments used to Identify, Attribute or Allocate costs must not result in any item being counted more than once.

We consider that the amended definition of Queensland Rail will improve the clarity of the below-rail financial statements created using the cost allocation manual.

In addition, an explicit clause requiring costs not to be double-counted will improve the transparency and provide assurance to stakeholders of the integrity of Queensland Rail's below-rail financial statements. It is appropriate that Queensland Rail holds responsibility to account correctly for its costs.

### Summary of issues

The key clarity issues raised by stakeholders and QCA draft responses, are summarised in Table 3.

**Table 3 Clarity of the cost allocation manual**

<i>Stakeholder comment</i>	<i>QCA draft comment</i>
New Hope considered the current definition of Queensland Rail did not require a description of Queensland Rail's responsibilities, as the current definition implies that Queensland Rail did not provide network coal services. <sup>19</sup>	We agree with New Hope's comment. The definition of Queensland Rail does not require a description of its responsibilities.
Pacific National considered there should be an explicit principle stating that there would be no double counting of costs. <sup>20</sup>	We agree with Pacific National's comment. Including an explicit 'no double-counting' principle is appropriate to provide for the adequate allocation of costs.
Pacific National considered the cost allocation manual should include a proper definition of the term 'immaterial amounts' as the rigid application of the cost allocation manual was not required for immaterial amounts. <sup>21</sup>	We consider the independent audit process undertaken on Queensland Rail's below-rail financial statements is sufficient to provide for the appropriate identification of immaterial amounts.
Pacific National pointed to a possible contradiction where stations and platforms were not included in below-rail services in section 3.1(c) of the cost allocation manual, but the definition of below-rail services indicated stations and platforms were included in below-rail services. <sup>22</sup>	Stations and platforms are a declared below-rail service. For the purposes of the cost allocation manual, we consider Queensland Rail's approach of excluding stations and platforms from below-rail costs adequately deals with the allocation of costs.
Pacific National requested a clearer definition of the term 'corridors', which replaced the term 'line sections' in Queensland Rail's proposed cost allocation manual. <sup>23</sup>	Queensland Rail has confirmed to the QCA that the term 'corridors' refers to the regions described in Schedule A. <sup>24</sup>

<sup>19</sup> New Hope, sub. 1: 1.

<sup>20</sup> Pacific National, sub. 2: 3.

<sup>21</sup> Pacific National, sub. 2: 2.

<sup>22</sup> Pacific National, sub. 2: 2.

<sup>23</sup> Pacific National, sub 2: 1.

<sup>24</sup> E-mail from Queensland Rail to the QCA, 21 March 2017.

<b>Stakeholder comment</b>	<b>QCA draft comment</b>
New Hope considered the allocation ratio (i.e., Standard Allocator A) applied to allocate corporate overhead costs to below rail was too high. <sup>25</sup>	We address New Hope's comment in the section below.

### Standard allocator A

Our draft decision is that Queensland Rail's proposed standard allocator A in schedule C adequately deals with the allocation of Queensland Rail-wide items.

Queensland Rail has proposed to apply standard allocator A to allocate un-costed corporate overheads, in addition to other Queensland Rail-wide items.

New Hope submitted that standard allocator A, at 45 per cent, was too high a proportion of corporate overheads to include in the below-rail financial statements. New Hope stated that Queensland Rail's recent focus on passenger services, agriculture and general freight supported its view.<sup>26</sup>

Queensland Rail proposed to recalculate standard allocator A annually based on working expenses, pro-rata on the total of all identified, attributed and allocated costs, when preparing its below-rail financial statements. The proposed adoption of standard allocator A to allocate un-costed corporate overhead costs will not likely have a material impact on the below-rail financial statements.<sup>27</sup>

We consider Queensland Rail's approach to determining standard allocator A would likely be an adequate proxy for material changes in Queensland Rail's focus. We also consider a consistent approach to allocating Queensland Rail-wide items will improve the transparency of the resulting below-rail financial statements.

When we develop our final decision, we are open to considering alternative, objective methodologies that can be employed to determine standard allocator A, or a separate allocation method for corporate overhead costs, in schedule C of the cost allocation manual.

---

<sup>25</sup> New Hope, sub 2: 2.

<sup>26</sup> New Hope, sub. 1: 2.

<sup>27</sup> Queensland Rail disclosed in note 3 of its 2016 below-rail financial statements that standard allocator A was 45 per cent and the pro-rata ratio of working expenses used to allocate corporate overhead was 45.4%. Queensland Rail 2016, *Financial statements for the year ended 30 June 2016 below rail services provided by Queensland Rail*.

## APPENDIX A: SUNDRY ISSUES IN THE COST ALLOCATION MANUAL

Table 4 below summarises sundry issues identified as part of our review of Queensland Rail's proposed cost allocation manual. Queensland Rail and stakeholders may be able to clarify a number of the terms amended.

**Table 4 Sundry issues in the cost allocation manual**

<i>Costing Manual Provision</i>	<i>QCA draft amendment to the cost allocation manual</i>	<i>QCA rationale and comments</i>
2.1(c), Part 5.	Changes to the drafting to show that obligations in relation to West Moreton Region, Mount Isa Region and North Coast Region are as applicable to the respective region.	Our amendments are intended to clarify that cost accounting obligations in relation to the West Moreton Region, Mount Isa Region and North Coast Region are particular to each region and not to the three regions as a block.
4.3.3.3(a).	Deletion of the words "(identified in the Undertaking)".	The below-rail yards are not identified in the approved access undertaking.
5.1(a).	Replacing the second instance of the words "West Moreton Region" with the words "each relevant Geographic Region".	We consider that to report below-rail assets, costs, revenues and investments separately for the three different regions, the manual should set out the methodology for allocating network-wide assets, costs, revenues and investments to each of the three regions as applicable.
5.1(b).	Amended the words "which is published at least six months [sic]" to "which is published on the Queensland Rail website and reviewed at least every six months".	Our proposed amendments accords with the relevant language in the undertaking.
5.1(e).	Amending cross-reference 5.1(c) to 5.1(f).	It appears the reference to clause 5.1(c) is an error.
5.3.2.11	Amending the clause to read: "The QCA Levy is to be reported based on the amounts paid by each of West Moreton coal-carrying trains, and North Coast Region freight traffic and Mount Isa Region freight traffic, in the relevant financial year".	The accounting for the QCA Levy should not be allocated, but based on actual amounts.
Definition of "Costing Manual" or "Manual".	Deletion of all the words following the words "the Act".	The reference to clause 10.1 of the undertaking appear to be incorrect. The information contained in a previous iteration of the undertaking to which this reference referred is no longer included in the current approved undertaking.
Definition of "Queensland Transport".	Deletion of definition.	Term not used.
Various.	Amending capitalisation of terms used throughout the costing manual to accord with their defined terms (or lack of definition or lack of use). For example: <ul style="list-style-type: none"> <li>• Geographic Region</li> <li>• Corridor</li> <li>• Network Wide</li> <li>• Fixed Asset Register</li> <li>• Queensland Transport</li> </ul>	Inconsistent use of defined terms may cause confusion.

<b><i>Costing Manual Provision</i></b>	<b><i>QCA draft amendment to the cost allocation manual</i></b>	<b><i>QCA rationale and comments</i></b>
	<ul style="list-style-type: none"> <li>• Line Section</li> <li>• Asset Specific</li> <li>• Investment Program Report</li> <li>• Survey Section</li> <li>• Infrastructure Services</li> <li>• Fixed Assets</li> <li>• Expenses</li> </ul>	
4.3.5.3	Deletion of references to DTMR and decapitalisation of the words "Rail Manager"	Rail accreditation is in the process of moving to a national regime.

---

## REFERENCES

---

New Hope Group 2017, Submission to the QCA, *Queensland Rail's 2016 cost allocation manual (costing manual)*, February. (sub. 1)

Pacific National 2017, Submission to the QCA, *Queensland Rail's 2016 cost allocation manual*, February. (sub. 2)

Queensland Competition Authority (QCA) 2016, *Queensland Rail's Draft Access Undertaking*, Decision, June.

Queensland Rail 2016, *Costing Manual submitted for approval by the Queensland Competition Authority*, December.

Queensland Rail 2016, *Financial statements for the year ended 30 June 2016 below rail services provided by Queensland Rail*, December.