



13 June 2017

**BY Email**

Grant Kari  
Director Infrastructure & Transport – Access & Pricing  
Australian Competition & Consumer Commission  
Level 35/ 360 Elizabeth St  
Melbourne Vic, 3000

Dear Grant

**Re: Consultation on proposed variation to the Australian Track Corporation Limited  
2011 Hunter Valley Coal Network Access Undertaking**

Broadly from what we understand about the ARTC proposal, Centennial agrees with the ARTC proposed variation.

Centennial's chief concerns are firstly, the path based pricing for those shippers who are prevented from having longer trains by restrictions in the adjoining network, and secondly, changes from contracted to actual tonnes as a means of allocating costs.

Centennial have to rail coal across three rail networks to get from the mines in the Lithgow area to the Port of Newcastle. Transport costs are Centennial's second largest expense and any increase would significantly impact Centennial's competitiveness.

Centennial must maintain its access to the contracted number of paths.

ARTC have assured Centennial that they will engage in a consultation process that effectively deals with Centennial's concerns starting as soon as July 2017. Whilst this looks positive, Centennial is determined to achieve its position that it should never be disadvantaged on account of having to travel across an adjoining network.

It is pleasing that ARTC have continued to be available for discussion. These conversations have been open and frank and give the sense that a fair outcome can be reached in these matters in a timely fashion.

Yours sincerely

Dennis Stone  
Logistics Manager