

28 July 2021

Mr Matthew Schroder  
General Manager  
Infrastructure & Transport – Access & Pricing Branch  
Australian Competition and Consumer Commission

Email: transport@acc.gov.au

Dear Mr Schroder,

**DORC valuation of ARTC's Interstate network – ACCC consultation paper**

Gloucester Coal Ltd (**Gloucester**) appreciates the opportunity to comment on the draft DORC valuation for the Australian Rail Track Corporation (**ARTC**) Interstate network.

Gloucester does not have any specific comments on the GHD draft report or the underlying technical assumptions. We support the ACCC's careful consideration of these important technical matters.

However, we share the ACCC's concerns regarding the potential for high ceiling limits and scope for ARTC to increase prices in future. As noted by the ACCC, it is particularly concerning given that the introduction of Inland Rail may exacerbate the issue of high ceiling limits to the extent that additional non-commercial assets are included in the regulatory asset base.

Gloucester therefore intends to actively participate in any future process for replacement of the Interstate Access Undertaking.

We also note the comments in the ACCC's consultation paper regarding the future regulatory framework for the Interstate network. We look forward to release of the ACCC's Issues Paper and look forward to engaging further with you as this process moves forward.

Yours sincerely,

Mike Dodd  
General Manager Infrastructure  
On behalf of Gloucester Coal Limited