



HOLDCO HOLDINGS PTY LTD
175 Murphy Street, East Bendigo, VIC 3550
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Phone +61 3 5434 7777 Fax +61 3 5443 7828
Web www.southernshorthaulrailroad.com.au

ABN 77 065 295 016



Tuesday 12th February 2019

By email: transport@acc.gov.au

Mr Matthew Schroder
General Manager
Infrastructure & Transport – Access & Pricing Branch
Australian Competition and Consumer Commission
GPO Box 520
Melbourne VIC 3001
Email: transport@acc.gov.au

Dear Mr Schroder,

In relation to the questions posed by the ACCC in relation to ARTC's request to vary its 2008 IAU, Southern Shorthaul Railroad wishes to provide the following brief responses.

- 1) The extension for 12 months is appropriate. Based on past experience this timeframe will be necessary.
- 2) CPI increases on access has been common place for the last 10 years, so is deemed appropriate.
- 3) SSR does not operate on that corridor so has no comment.
- 4) The detail has not been fully considered at this time by SSR.
- 5) This would be unsuitable, as SSR would have little opportunity to reclaim track access against customers who have already been invoiced. Any increase in track access rates need to be upfront so they can be passed onto customers before services are operated. Reconciliation is not suitable as the rail operator may be left footing the bill when that cost would have been passed onto customers up front if the rate increase was known. As rail operators, we need to know the costs for providing a service on the day of operation. Reconciliation of access rates gives us little or no ability to capture that increased cost from our customer, and transversely, if we receive the benefit, then it is difficult to provide that back to customers without significant administrative costs.
- 6) Yes
- 7) By my brief reading, it appears that if approved, the rail operator may be liable for additional access fees.
- 8) Without detailed review I cannot comment.
- 9) No

Kind Regards,

The logo for Southern Shorthaul Railroad (SSR) features the letters 'SSR' in a bold, white, sans-serif font. The letters are set against a black background that is part of a larger orange and black graphic element.

SOUTHERN SHORThAUL RAILROAD

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A handwritten signature in black ink that reads 'C Jones'. The signature is written in a cursive, slightly slanted style.

Chris Jones

*Executive General Manager - Commercial, Rollingstock & Rail Safety
Southern Shorthaul Railroad*