

MALLESONS STEPHEN JAQUES

For public register

Dr Richard Chadwick
General Manager, Adjudication Branch
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

13 July 2009

Attention: David Hatfield / Jaime Martin

Dear Dr Chadwick

Port Waratah Coal Services Limited, Newcastle Coal Infrastructure Group Pty Ltd and Newcastle Port Corporation applications for authorisation A91147-A91149 – response to ACCC request for information

Attached is a submission from Port Waratah Coal Services Limited, Newcastle Coal Infrastructure Group Pty Ltd and Newcastle Port Corporation responding to the Commission's request for information dated 3 July 2009.

This letter and the submission and attachments can be placed on the Commission's public register.

If you require any further information, please contact either Wayne Leach on (02) 9296 2327 or myself.

Yours sincerely



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Port Waratah Coal Services
Limited

Newcastle Coal Infrastructure
Group Pty Limited

Newcastle Port Corporation

Response to issues raised by
the Commission

Dated 13 July 2009

Port Waratah Coal Services Limited
Newcastle Coal Infrastructure Group Pty
Limited
Newcastle Port Corporation
Response to issues raised by the Commission

1 Introduction

This submission sets out the Applicants' response to the questions raised by the Commission in its letter dated 3 July 2009 in relation to Applications for Authorisation A91147 - A91149.

2 The Applicants' response to the Commission's questions

2.1 Question 1

Please provide a complete timetable of the work to be completed by the relevant parties in order to implement the long term solution by 1 January 2010. In doing so, please clarify which aspects of this work cannot be progressed without interim authorisation and why.

If the Commission grants interim authorisation, the Applicants will commence implementation of aspects of the long term solution with effect from 1 July 2009. The conduct set out in Part A of Attachment 1 of the supporting submission to the applications for authorisation forms an integral part of the long term solution.

Attachment A sets out a draft timetable which has been prepared by NPC (and agreed in principle with PWCS and NCIG) in relation to the work that will be undertaken to enable the complete implementation and roll-out of the long term solution. The draft timetable provides details in relation to:

- (a) each document that needs to be finalised;
- (b) the party responsible for drafting each document;
- (c) the status of each document; and
- (d) the program for finalising the terms of each document.

It is possible that some of the internal dates may change, depending on issues that are raised in finalising the documents. However, it is intended that final versions of the long term documentation will be prepared by 10 August 2009 in order to enable Board approvals and execution by 31 August 2009.

Attachment B also sets out a high level summary of the long form documentation and the matters to be addressed in each document.

The Applicants consider that, without authorisation:

- (a) PWCS will not be able to implement the offer and acceptance of PWCS Base Tonnage for 2009 in accordance with Section 1 of Part A (Attachment 1);
- (b) PWCS will not be able to undertake the conduct set out in Section 2 of Part A (Attachment 1) to
 - (i) facilitate contractual alignment;
 - (ii) manage the vessel queue; or
 - (iii) implement the conduct set out in Section 3 of Part A (i.e the transfer fee cap);
- (c) PWCS will not be able to implement the offer and acceptance of PWCS Base Tonnage for 2010 and commence its nomination and allocation process in accordance with Sections 1 and 2 of Part B (Attachment 1), which it will need to do in September 2009 in order to:
 - (i) issue long term ship or pay contracts which will give effect to these allocations from 1 January 2010;
 - (ii) finalise the System Assumptions (on a load point by load point basis) with other service providers which will, in turn, enable it to issue long term ship or pay contracts which facilitate contractual alignment;
- (d) PWCS will not be able to implement the "Allocation of Capacity for 1 October 2009 to 31 December 2009" conduct set out in Section 2(aa) of Part B (Attachment 1); and
- (e) the Applicants will not otherwise be able to undertake the remainder of the conduct set out in Part B (Attachment 1).

If interim authorisation is not granted, the Applicants will not be able to undertake this conduct unless and until final authorisation is granted. Based on the indicative timetable set out in the Commission's letter dated 1 July 2009, this is unlikely to occur before October / November 2009.

2.2 Question 2

What are the specific public benefits that are likely to arise from the implementation of the 2009 Base Tonnage Offer for the remainder of 2009?

The Applicants are not seeking authorisation of the 2009 Base Tonnage Offer in isolation from the other conduct set out in Part A and Part B of Attachment 1 of the supporting submission. The 2009 Base Tonnage Offer and other conduct specified in Part A of Attachment 1 form the first part of the detailed long term solution and provide the basis for transitioning to all aspects of the long term solution from 1 January 2010.

Accordingly, the Applicants consider that having regard to the statutory test for authorisation set out in sections 88(1) and 88(7) of the *Trade Practices Act 1974* (Cth), the public benefits and detriments associated with one aspect of the conduct for which authorisation is sought should not be considered in isolation from other conduct which is integral to the proposed arrangements.

If, by its question, the Commission is seeking information in relation to why the application for interim authorisation is not merely a roll-over of the PWCS Tonnage Allocation Stage 1 which was authorised until 30 June 2009, the Applicants would draw the Commission's attention to:

- (a) the letter to the Commission from Coal & Allied Industries Limited ("C&A") dated 8 July 2009 which states that:

"C&A believes the "phase-in" approach is fundamentally different from the previous Capacity Balancing System (CBS) since it forms part of the Long Term Capacity Framework. This framework will provide producers and service providers with the necessary commercial provisions required to underpin long term investments in the expansion of capacity. In addition, C&A recognises that the NSW Government has played an influential role in guiding the industry to develop the Long Term Capacity Framework. In particular, the intended amendments of the terminal lease arrangements are key enablers for the ports to commit to expansion investments backed by long term take-or-pay contracts. As such, we believe the "phase-in" approach is not a simple repeat of the previous CBS";

- (b) the letter to the Commission from Xstrata Coal dated 8 July 2009 which states that:

"The interim authorisation is critical for PWCS to be able to conduct its Nomination and Allocation process and for PWCS, together with NPC and other critical stakeholders, to take steps to implement contractual alignment across the coal chain. The interim authorisation and the next six months will allow the industry to transition commercially and operationally to long term contracts.

The conduct for which interim authorisation is sought is not an extension of the CBS because it includes steps to implement contractual alignment by way of assigning responsibility for system losses to responsible parties based on underlying commercial contracts"; and

- (c) the email to the Commission from Bloomfield Collieries dated 8 July 2009 which states that:

"There is a measured but significant change from the status quo. During the transitional phase (1 July 2009 - 31 December 2009) aspects of the long term solution are proposed to be introduced, including -

Nomination of a Producer's individual load point demands which will assist in coal chain planning (currently only a total is provided)

- *Quantification and notification of the impact that any change in a Producer's nominated load point demand mix has on coal chain capacity (currently this is unknown to Producers)*
- *The requirement that a Producer have access to Port, Track and Train capacity before a nomination is accepted by PWCS (currently only Port required)".*

The Applicants consider that these are each significant developments, which involve commencement of the long term solution, including specific measures to facilitate contractual alignment, from 1 July 2009, and transitioning to all aspects of the long term solution from 1 January 2010. This involves significant public benefits. In addition, PWCS considers that the interim authorisation will enable it to manage the vessel queue (see response to Question 4 below). As previously recognised by the Commission, management of the vessel queue involves clear public benefits.

2.3 Question 3

Page 2 of the supporting submission states that "PWCS, NCIG and ARTC will work through the details of their proposed contracting arrangements to ensure they are aligned".

Please explain the process and timing for this to occur between the parties.

Over the past few months, PWCS has undertaken work with ARTC in relation to the alignment of key aspects of their proposed contracting arrangements. This has included work in relation to:

- operating parameters relating to allocation periods, usage and tolerance;
- the sequencing of vessels for loading (and hence the allocation of stockpiles for coal deliveries);
- transfers; and
- the timing of ARTC's contracting processes and PWCS' nomination and allocation processes.

This work will progress over the next 2-3 months as:

- PWCS continues its consultation with producers in relation to its contractual arrangements;
- the process in relation to ARTC's Access Undertaking and negotiation of User Agreements progresses;

PWCS models its alternative vessel sequencing system; and

the Capacity Transfer System is further developed.

Further details in relation to the timing of the contractual alignment process are set out in Appendix 1 of Attachment 2 of the Applicants' supporting submission.

NCIG has worked with ARTC to gain assurance that adequate rail-track capacity will be available to match the port export capacity. This has also been done with individual NCIG shareholders. NCIG has, in this context, also discussed timing at the port with ARTC. NCIG has notified PWCS and NPC of its intention to run its nomination and allocation procedure for Stage 2 in 2009, and is, where possible, coordinating with the PWCS nomination and allocation procedure.

2.4 Question 4

In support of public benefit claims in relation to managing the size of the vessel queue offshore, please explain how the PWCS Base Tonnage for 2009 (under Part A of the proposed Capacity Framework Arrangements) will assist in managing the vessel queue to around 20-25 vessels.

The combination of:

- (a) the PWCS 2009 Base Tonnage Offer (under which the aggregate 2009 PWCS Base Tonnage available for offer is 96.7 Mt);
- (b) the "contractual alignment and vessel queue conduct" set out in Section 2 of Part A; and
- (c) the proposed retrospective operation of the long term solution from 1 July 2009,

will assist in managing the vessel queue to around 20 – 25 vessels.

In particular, the "contractual alignment and vessel queue conduct" set out in Section 2 of Part A enables PWCS to:

- (a) require Producers to have adequate entitlements to track and train haulage upon lodging any application under the Coal Handling Services Agreement for the provision of coal handling services in respect of each vessel to be loaded;
- (b) decline to supply coal handling services if a Producer has inadequate track or train delivery entitlements in respect of the application for a vessel to be loaded; and
- (c) revise flexibility limits or reduce allocations on a pro rata basis should an excessive vessel queue develop or be forecast to develop due to impacts at PWCS. Where excess queuing is due to an impact external to the Terminals, PWCS may, but is under no obligation to, apply adjustments to allocations in a manner that reasonably reflects that impact.

Before revising flexibility limits or reducing allocations, PWCS will seek to address excessive vessel queues through seeking voluntary reductions of

allocation from Producers. Pro rata reductions will also only be applied if the queue cannot be managed through voluntary reductions or revision to the flexibility limits.

PWCS considers that, in combination, these measures will assist in delivering the public benefit referred to in the Applicants' supporting submission -- namely, managing the vessel queue to around 20-25 vessels.

2.5 Question 5

Please provide the average size of the vessel queue for each month of the first half of 2009. Please include an explanation of the factors that contributed to the size of the queue.

The Table below sets out a summary of the average vessel queue by month for the first half of 2009, together with factors that have contributed to the size of the vessel queue.

Month	Average Queue	Contributing Factors
Jan-09	26	<ul style="list-style-type: none"> • PWCS applied an allocation reduction of 1.3 Mt in Quarter 1 to reduce the end of 2008 vessel queue (approximately 15 vessels). • Vessel arrivals in late January and February were well below coal chain capacity. • In February, PWCS made additional allocation available for the first half of March to reduce the impact of low demand and coal availability issues on coal chain utilisation and throughput.
Feb-09	17	
Mar-09	16	
Apr-09	27	<ul style="list-style-type: none"> • During April, emergency track works at Allandale impacted coal movements to PWCS. • Port restrictions due to adverse weather have impacted vessel movements and shiploading rates across the quarter. • PWCS applied a 1 Mt allocation reduction to Quarter 2 / June to reduce the building queue (approximately 12 vessels). • Vessel arrival rates for June were well above allocation (108mtpa vs declared capacity of 96mtpa), with use of flexibility provisions by Producers countering the allocation reduction. • Whilst the vessel queue is high, there are a number of vessels in the queue for which coal is not available.
May-09	29	
Jun-09	40	

2.6 Question 6

Section 2(b) of Part A of the proposed Capacity Framework Arrangements states that PWCS will refuse to supply coal handling services if a producer has inadequate track or train delivery entitlements. Please explain whether it is practically possible, or if PWCS intends, to engage in this conduct during the remainder of 2009.

PWCS is intending to seek confirmation from rail service providers that there are contractual entitlements for the haulage of coal in respect of each vessel to be loaded for the remainder of 2009. Until the rail service provider provides

this confirmation, PWCS proposes not to accept the application to load a vessel.

2.7 Question 7

Section 1(b) of Part A of the proposed Capacity Framework Arrangements states that before a producer can accept any offer of a 2009 PWCS Base Tonnage, it must, among other things, advise PWCS of a constant tonnage for each individual Load Point. Can you please confirm whether Load Point nominations will be binding on producers for the remainder of 2009 and if not, when this will occur.

Producers will be required to provide a load point breakdown of their Base Tonnage Offer for July 2009 to December 2009. Upon lodging any application under the Coal Handling Services Agreement for the provision of coal handling services in respect of each vessel to be loaded, Producers will be required to ensure that they have contractual entitlements for the delivery of coal from each load point.

While work is continuing on defining the System Assumptions (see response to Question 3 above), performance standards and the Capacity Transfer System, each Producer's performance with respect to its Load Point Allocations will be monitored. The performance of a Producer will be reported confidentially to that Producer and the performance of all Producers will be reported in aggregate to all Producers. This is to educate Producers on the impacts of transfers, load point performance and changes in demand profile.

Allocations will become binding on a load point basis at the latest from 1 January 2010.

2.8 Question 8

In its media release of 30 June 2009, PWCS welcomes signing of long term export agreement, PWCS states that the common user clause in its lease will be suspended. Can you please confirm when this is intended to occur?

The suspension of the common user provisions will be part of the amendments to PWCS' leases that are intended to be in place by 31 August 2009 (along with the remainder of PWCS' Capacity Framework Documents).

It is therefore intended that the implementation of the entire agreed long term solution will substitute the common user provision.

2.9 Question 9

Regarding the proposed Capacity Transfer System (CTS) to be developed under the Capacity Framework Agreement, page 16 of the supporting submission states that the CTS will not be the exclusive means of transferring capacity.

Please explain what other means producers will have to transfer capacity?

As set out in the response to Question 7 above, the operation of the CTS has not yet been finalised. In addition to capacity transfers under the CTS,

producers will be able to transfer capacity privately. This would be a continuation of the types of bi-lateral arrangements between producers which currently occur.

The ability to make such arrangements would enhance the efficient utilisation of any "spare" capacity as such transactions can be done quickly to minimise "lost" capacity. Producers will also be able to register these private transfers on the CTS as a means of satisfying that producer's best endeavours obligations to transfer relevant unused allocations as contemplated in the Implementation Memorandum, such that the producer will continue to be able to rely on certain exceptions in respect of anti-hoarding compression. This registration would also add to the transparency of the process.

3 Conclusion

The Applicants may provide a further supplementary submission responding to any issues raised by industry participants in response to the Commission's letter dated 1 July 2009.

If the Commission has any further questions in relation to the matters set out in this submission, the Applicants would be pleased to assist.

**Port Waratah Coal Services Limited
Newcastle Coal Infrastructure Group Pty Limited
Newcastle Port Corporation
13 July 2009**

Attachment A - draft timetable of work to be undertaken to implement the long term solution

CAPACITY FRAMEWORK IMPLEMENTATION PROGRAM

The table below outlines the following:

- each document that is required to be finalised in order to implement the terms of the Implementation Memorandum (IM);
- the relevant party that is responsible for drafting that document;
- the relevant status of that document (including any notes or comments relevant to the status of that document); and
- a suggested program for finalising the terms of that document.

The objective is to have all documents finalised and (where relevant) executed on or before **31 August 2009**.

There will be a telephone hook-up between all parties at 10 am each Friday to track progress against the timetable and to confirm the process of the following week. This telephone call will be substituted with a meeting if the parties are scheduled to meet for discussions on that Friday in accordance with the timetable.

Item #	Document	Drafting responsibility	Status/Comments	Program for finalisation
PART A – PWCS DOCUMENTS				
1	Deed of Amendment to PWCS Lease	NPC	Document is progressing according to the program for finalisation.	<p>Draft 1: Issued to PWCS on Wed, 29 April</p> <hr/> <p>Draft 2: Issued to PWCS on Wed, 27 May</p> <hr/> <p>Revised Draft 2 issued by NPC: Tues, 30 Jun Discussion (NPC/PWCS): Thurs, 2 July Place: NPC Time: 9am</p> <hr/> <p>Draft 3: To be issued to PWCS by Wed, 15 Jul</p> <hr/> <p>Mark-up of Draft 3: Tues, 21 Jul Discussion (NPC/PWCS): Wed, 22 Jul Place: NPC Time: 9am</p>

CAPACITY FRAMEWORK IMPLEMENTATION PROGRAM

Item #	Document	Drafting responsibility	Status/Comments	Program for finalisation
				<p>Redacted version for NCIG comment: To be issued by Fri, 24 Jul</p> <p>Comments from NCIG: Fri, 31 Jul Discussion (NPC/NCIG): Fri, 7 Aug Place: G+T Office Time: 11am</p> <p>Final/Execution version (redacted for NCIG): To be issued to PWCS/NCIG by Mon, 10 Aug</p> <p>Board approvals and execution by 31 August</p>
2	PWCS Long Term Ship or Pay	PWCS	<p>A preliminary draft was issued to NPC in May and high level comments provided.</p> <p>PWCS issued a first draft consultation version to its customers on 3 June 2009.</p> <p>PWCS will be issuing a second draft consultation version to its customers on or about Friday 10 July 2009. To facilitate this, PWCS provided an interim draft to NPC for comment on Tuesday 7 July 2009.</p> <p>Document is otherwise progressing according to the program for finalisation.</p>	<p>Draft 1: Issued to NPC on Thurs, 4 June</p> <p>Mark-up of Draft 2: Tues, 30 Jun Discussion (NPC/PWCS): Thurs, 2 Jul Place: NPC Time: 9am</p> <p>Draft 2 (customer consultation draft): To be issued on Friday, 10 July</p> <p>Consultation during the week commencing Mon, 13 Jul</p> <p>Draft 3: To be issued to NPC by Wed, 22 Jul</p> <p>Mark-up of Draft 2: Tues, 28 Jul Discussion (NPC/PWCS): Wed, 29 Jul Place: NPC Time: 10am</p> <p>Redacted version for NCIG comment: To be issued by Mon,</p>

CAPACITY FRAMEWORK IMPLEMENTATION PROGRAM

Item #	Document	Drafting responsibility	Status/Comments	Program for finalisation
				<p>3 Aug Comments from NCIG: Thurs, 6 Aug Discussion (NPC/NCIG): Fri, 7 Aug Place: G+T Office Time: 11am</p> <hr/> <p>Final/Execution version: To be issued to NPC/NCIG by Mon, 10 Aug</p> <hr/> <p>Board approvals by 31 August</p>
3	PWCS Nomination and Allocation Procedure	PWCS	Same as for Item 2	Same as for Item 2
4	PWCS Terminal Access Protocols	PWCS	Same as for Item 2	Same as for Item 2
5	AFL for T4	NPC	<p>Document is progressing according to the program for finalisation.</p> <p>PWCS forwarded revised comments on Wednesday 8 July 2009. The parties anticipate that these comments will be discussed on Friday, 10 July 2009. Following these discussions, a second draft will be issued by PWCS on or before 15 July 2009.</p>	<p>Draft 1: Issued to PWCS on Thurs, 28 May</p> <p>Comment on Draft 1: Discussion (NPC/PWCS): Tues, 30 Jun Thurs, 2 Jul Place: NPC Time: 9am</p> <hr/> <p>Draft 2: Mark-up to be issued by PWCS by Wed, 15 Jul</p> <p>Discussion (NPC/PWCS): Fri, 24 Jul Place: NPC Time: 9am</p> <hr/> <p>Draft 3: To be issued to PWCS by Mon, 27 Jul</p> <p>Mark-up of Draft 3: Wed, 29 Jul Discussion (NPC/PWCS): Fri, 31 Jul Place: G+T Office</p>

CAPACITY FRAMEWORK IMPLEMENTATION PROGRAM

Item #	Document	Drafting responsibility	Status/Comments	Program for finalisation
				<p>Place: G+T Office Time: 1pm</p> <hr/> <p>Final/Execution version (redacted for PWCS): To be issued to PWCS/NCIG by Mon, 10 Aug</p> <hr/> <p>Board approvals and execution by 31 August</p>
7	NCIG Long Term Ship or Pay	NCIG	<p>Document is progressing according to the program for finalisation.</p> <p>Draft 2 to address NPC high level comments. NCIG to prepare alternative proposal if NCIG's preference is to address the comments by some other means.</p>	<p>Draft 1: Hard copy has been released for G+T review and comments provided NPC high level comments to be provided by Wed, 1 Jul</p> <hr/> <p>Draft 2: To be issued to NPC by Thurs, 9 Jul</p> <p>Mark-up of Draft 2: Wed, 15 Jul Discussion (NPC/NCIG): Fri, 17 Jul Place: G+T Office Time: 9am</p> <hr/> <p>Draft 3: To be issued to NPC by Thurs, 23 Jul</p> <p>Mark-up of Draft 3: Wed, 29 Jul Discussion (NPC/NCIG): Fri, 31 Jul Place: G+T Office Time: 10am</p> <hr/> <p>Redacted version for PWCS comment: To be issued by Mon, 3 Aug</p> <p>Comments from PWCS: Thurs, 6 Aug Discussion (NPC/PWCS): Fri, 7 Aug Place: NPC Office Time: 1pm</p> <hr/> <p>Final/Execution version: To be issued to NPC/PWCS by</p>

CAPACITY FRAMEWORK IMPLEMENTATION PROGRAM

Item #	Document	Drafting responsibility	Status/Comments	Program for finalisation
				Mon, 10 Aug <hr/> Board approvals by 31 August
8	NCIG Nomination and Allocation Procedure	NCIG	Document is progressing according to the program for finalisation. This document has undergone a number of iterations since it was initially prepared. Further discussions took place on Friday 3 July. NCIG to prepare next draft in accordance with the outcomes of these discussions.	Same as for Item 7
9	NCIG Terminal Access Protocols	NCIG	Document is progressing according to the program for finalisation.	Same as for Item 7
PART C – PWCS/NCIG DOCUMENTS				
10	Levy Protocols	PWCS/NCIG	<p>NCIG and PWCS have been working with Deloitte for several weeks to prepare the Levy Protocols.</p> <p>Deloitte provided an overview for NPC on Friday 3 July. NPC to revert with comments (including issue re risk of default) before issue of Draft 2.</p> <p>Document is otherwise progressing according to the program for finalisation.</p> <p>Draft 2 has been prepared by Deloitte and is being considered by PWCS and NCIG. PWCS and NCIG will provide this draft to NPC when the second draft is settled.</p> <p>PWCS will provide a draft copy of the levy protocols to its customers on or about Friday, 10 July 2009, for consultation purposes.</p>	<p>Draft 1: To be issued to NPC by Mon, 29 Jun</p> <p>Comments of Draft 1: Thurs, 2 Jul Discussion (NPC/PWCS/NCIG): Fri, 3 Jul Place: G+T Office Time: 10am</p> <hr/> <p>Draft 2: To be issued to NPC by Fri, 10 Jul</p> <p>Mark-up of Draft 2: Thurs, 16 Jul Discussion (NPC/PWCS/NCIG): Fri, 17 Jul Place: G+T Office Time: 11am</p> <hr/> <p>Draft 3: To be issued to NCP by Fri, 24 Jul</p> <p>Mark-up of Draft 3: Thurs, 30 Jul Discussion (NPC/PWCS/NCIG): Fri, 31 Jul Place: G+T Office Time: 11am</p>

CAPACITY FRAMEWORK IMPLEMENTATION PROGRAM

Item #	Document	Drafting responsibility	Status/Comments	Program for finalisation
				<p>Final/Execution version: To be issued by Mon, 10 Aug</p> <hr/> <p>Board approvals by 31 August</p>
11	Capacity Framework Agreement	NPC	<p>NCIG and PWCS to provide comments prior to the issue of Draft 2 (due to be issued on Fri day 10 July).</p> <p>Document is progressing according to the program for finalisation.</p>	<p>Revised Draft 1: To be issued to PWCS/NCIG by Wed, 1 Jul</p> <p>General discussion (NPC/PWCS/NCIG): Fri, 3 Jul Place: G+T Office Time: 10am</p> <hr/> <p>Draft 2: To be issued to PWCS/NCIG by Fri, 10 Jul</p> <p>Mark-up of Draft 2: Thurs, 16 Jul Discussion (NPC/PWCS/NCIG): Fri, 17 Jul Place: G+T Office Time: 11am</p> <hr/> <p>Draft 3: To be issued to PWCS/NCIG Fri, 24 Jul</p> <p>Mark-up of Draft 3: Thurs, 30 Jul Discussion (NPC/NCIG/PWCS): Fri, 31 Jul Place: G+T Office Time: 10am</p> <hr/> <p>Final/Execution version: To be issued to PWCS/NCIG by Mon, 10 Aug</p> <hr/> <p>Board approvals and execution by 31 August</p>

Attachment B - summary of long form documentation

Summary of Long Form Documentation

Key: = NPC to draft = Terminals to draft = NCIG to draft = PWCS to draft = No need to draft (existing doc)



