

GLENCORE

Thursday, 26 September 2013

Dr Malcolm Roberts
Chairman
Queensland Competition Authority
Level 27, 145 Ann Street
Brisbane QLD 4000

Dear Malcolm,

Re Aurizon Network's Draft Northern Bowen Basin System Rules

Glencore is appreciative of the opportunity to provide comment on its concerns regarding Aurizon Network's Northern Bowen Basin System Rules (NBB System Rules).

There are several areas of concern regarding the NBB System Rules, most significantly with the relationship between the NBB System Rules and Aurizon Network's Draft 2013 Undertaking (UT4). It is Glencore's belief that the NBB System Rules have the potential to impact issues which are being addressed as part of the UT4 process and for this reason approval of the NBB System Rules should be withheld until UT4 has been approved.

Also among these concerns are; the inconsistencies between the NBB System Rules and Glencore's Access Agreements (via its Access Holders), the lack of pathing flexibility within the NBB System Rules, and the irregularities between the NBB System Rules and Aurizon Network's Draft Capricornia System Rules.

Glencore believes that much of its concerns have been addressed in Asciano's detailed submission regarding the NBB System Rules and would therefore like to formally communicate its support of their submission.

If you have any queries on this matter please feel free to contact either myself or Brett Harris on (02) 4925 6427.

Yours sincerely 



Don McLachlan
Operations Manager – Coal Assets Australia
Glencore
Don.McLachlan@glencore.com.au