



Our Ref: 20161018\_EESA Coverage Test Submission  
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18 October 2016

Dr Michael Vertigan AC  
Examination of the Coverage Test  
COAG Energy Council Secretariat  
GPO Box 787  
CANBERRA ACT 2601

By email: [energycouncil@environment.gov.au](mailto:energycouncil@environment.gov.au)

Dear Dr Vertigan,

**Re: Examination of the current test for the regulation of the gas pipeline – Consultation Paper**

We refer to the above Consultation Paper (the “Paper”) dated 4 October 2016 requesting stakeholder feedback responding to the ACCC’s Inquiry into the East Coast Gas Market (“Inquiry”) findings, the significance of the problems identified, the effectiveness of the existing regulatory test, the appropriateness of the ACCC’s proposed market power test and, if a change in regulatory arrangements is warranted, alternative means of achieving this.

Epic Energy South Australia Pty Ltd (“Epic”) has provided input into and closely reviewed the Australian Pipelines and Gas Association (APGA) submission to the paper including the supporting expert opinions. Epic does wish to express some concerns with the validity of the ACCC Inquiry findings and the conclusion drawn from the information gathered during the Inquiry that the coverage criteria is ineffective.

Accordingly, Epic supports the APGA submission and welcomes any further opportunity to participate in the review of the coverage criteria.

Yours Sincerely,

PP **Clive D’Cruz**  
Chief Executive Officer

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