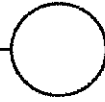


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APA Group



Australian Pipeline Ltd
ACN 091 344 704

Australian Pipeline Trust
ARSN 091 678 778

APT Investment Trust
ARSN 115 585 441

APA GasNet Australia (Operations) Pty Ltd
ABN 65 083 009 278

13th March 2009

ISC Secretariat
Governance Section
National Energy Market Branch
Department of Resources, Energy and Tourism
GPO Box 1564
Canberra ACT 2601

Attn: Mr Steve Rodgers

Dear Sirs,

APA Group welcomes this opportunity to comment on the draft Declared Wholesale Gas Market Rules.

The process of incorporating the Victorian Market and System Operations Rules (MSOR) into the National Gas Rules (NGR) has generally been successful. APA would like to make only a few comments.

APA Group is concerned that the dispute resolution processes that had been extensively debated within the consultation processes of the Victorian market and signed off by the Gas Market Consultative Committee and the VENCORP board were significantly changed in this draft.

With regard to specific rules, we make the following comments:

Rule 53 While Rule 43 states that operational gas is to be included in the linepack account by AEMO, the actual calculation of the amount of the linepack account does not include operational gas. It is necessary for the cost of operational gas to be included in this calculation as it will not be recovered otherwise.

Rule 96 (2) This rule quotes 3,000 tonnes of LNG storage capacity for the LNG reserve whereas, since early 2008 the LNG reserve has been 1,500 tonnes

Rule 97 (6) The 7:00 am cut off for notification to the LNG Storage Provider is unchanged from when the gas day began at 9:00 am. It should be adjusted to reflect the 6:00 am gas day start. Rather than state a fixed time, it should be expressed as "2 hours prior to the start of the gas day". This will accommodate any future change to the beginning of the gas day.

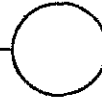
Rule 97 (7) The 8:00 am cut off for notification by the LNG Storage Provider to AEMO is unchanged from when the gas day began at 9:00 am. It should be adjusted to reflect the 6:00 am gas day start. Rather than state a fixed time, it should be expressed as "1 hour prior to the start of the gas day". This will accommodate any future change to the beginning of the gas day.

Rule 97 (10) There is an extra "be" in the fourth line before "valid".

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If you have any queries with regard to these comments, please contact me on (03) 9797 5204

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Paul Callander', written in a cursive style.

Paul Callander
Manager Regulatory and Gas Market