

14 April 2025

Mike Smart
Chief Economist
Independent Pricing and Regulatory Tribunal
Level 16, 2-24 Rawson Place
Sydney NSW 2000

Dear Mr Smart,

Re: IPART Draft Report on TAHE Compliance with the NSW Rail Access Undertaking 2023-24

The Transport Asset Manager (TAM) welcomes the opportunity to comment on the Independent Pricing and Regulatory Tribunal's (IPART) March 2025 Draft Report on Transport Asset Holding Entity's (TAHE) 2023-24 Compliance with the NSW Rail Access Undertaking (the Draft Report).

TAHE transitioned from a State-Owned Corporation to an NSW Government agency, TAM, following the December 2024 proclamation of the Transport Administration Amendment Act 2024 (NSW). From 1 January 2025 TAM is the owner of the NSW rail networks, which are the subject of the compliance submission and Draft Report. This response uses the terminology TAM rather than TAHE except where it references the title of the compliance submission or the title of the Draft Report.

TAM welcomes that the Draft Report findings reflect the compliance submission made by the TAHE in October 2024.

TAM appreciates IPART's recognition of TAM's implementation of the TAM HVCN Unders and Overs Account Policy in price changes from 1 July 2024. We reiterate that current and historical TAM HVCN over-recoveries are being addressed over 2024-25 and 2025-26, consistent with the Policy.

The Draft Report (page 21) states that TAM had previously advised IPART that TAM HVCN coal access revenue for 2024-25 was down 58% from 2023-24 revenue for the same period. Updated TAM figures estimate TAM HVCN coal access revenue for 2024-25 down 65% from 2023-24 revenue. TAM currently forecasts a full year HVCN coal revenue figure of \$2.745 million, which is substantially lower than the TAM HVCN coal revenue of \$7.916 million recorded for 2023-24.

TAM's contact for this submission is Stuart Ronan, Senior Manager Regulatory, who is available on [REDACTED] or at [REDACTED]

Sincerely,

[REDACTED]

Chris Stewart
Head of Regulatory & Pricing
Transport Asset Manager