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Mr Russell Keith Clerk Assistant Committees Fuel Price Disclosure Bill Scrutiny Committee Legislative Assembly of the Northern Territory la.committees@nt.gov.au

Dear Mr Keith

In preparation for the Committee hearing on 13 February 2015, Caltex updated and expanded on some of the information on fuel pricing contained in its earlier submissions.

It was intended that this material be tabled at the hearing but the opportunity to do so did not arise. However, I believe this material would assist the committee and be of value to public understanding of pricing issues.

I therefore would appreciate the opportunity to make this further submission.

Please do not hesitate to contact me (ftopham@caltex.com.au; 0411 406 379) should you wish to discuss any aspects of this submission.

Yours sincerely

Frank Topham Head of Government Affairs

Second supplementary Caltex submission to Fuel Price Disclosure Bill Scrutiny Committee

1. Petrol price update

Caltex's December 2014 submission to the inquiry contained the following chart, which showed no trend in the notional retail margin (average retail price for ULP minus average terminal gate price) from 2002 to first half 2011 but an upward trend after that time. By the time of the 7 October 2014 Fuel Summit, the notional margin had increased to about 30 cpl.



Caltex submission showed diverging retail price v TGP ...

The following chart updates the above chart, for the period January 2012 to mid-February 2015. It can be seen that retail prices fell sharply in late October 2014, then tracked the falling TGP, with a lag. As of mid-February 2015, the notional retail margin was about 10 cpl.



The following chart examines the response of retail prices in Darwin to wholesale prices (TGPs). In order to examine the relationship, TGPs are lagged by 14 days (i.e. retail prices relative to TGPs two weeks earlier) to allow time for retail fuel stocks to be purchased and sold, and time for retailers to review their pricing decisions and make adjustments to prices and the basis of costs and local competition. In addition, retail prices and TGPs are charted on different axes; TGP relates to the right hand axis, which is shifted by 13 cpl (the average difference between retail price and TGP over the three year period).

It can be seen there is quite a close relationship between retail price and TGP. In particular, it can be seen that retail prices tracked TGPs downwards in recent months. However, retail prices are less volatile than TGPs, so there may be significant variations in notional retail margins over short time periods.



Caltex's supplementary submission to the Committee observed that "short term variations in retail margins (both downward and upwards) most likely reflect a 'stickiness' in prices that is observed to varying extents in many other non-metropolitan markets".

The ACCC has observed:

Furthermore, retail prices in some regional locations are 'sticky', i.e. they are less responsive—both upwards and downwards—to movements in international prices (ACCC, *Monitoring of the Australian petroleum industry December 2014*. p75).

Why are prices in some markets "sticky"? The ACCC offers an explanation:

In small country towns with a small number of retail sites there may be little incentive to reduce prices. This is because competitors will also quickly reduce their prices and the net result is the same volume of petrol sold at each retail site but with a lower margin (ACCC, *Monitoring of the Australian petroleum industry December 2014*, p74).

While the ACCC's comments are in relation to "small country towns", there is clearly a degree of stickiness in larger towns. "Stickiness" is generally not observed in the largest urban areas because some competitors can secure permanent increases in site volume by positioning themselves as "price discounters" or "budget sites". Sufficient numbers of city motorists are willing to reward this pricing strategy by shifting their purchases from site to site. Such a discount strategy is more likely to succeed where there are high traffic flows, hence large potential markets, and a discount competitor's action has

relatively less impact on other competitors' volumes. Where such a strategy has a significant volume impact on competitors – as would be the case in most country towns due to the small number of sites – those competitors are more likely to react quickly to cut prices and avoid the potential loss of volume.

The following chart examines the relationship between retail prices and TGP in regional areas of the Territory. The relationship is not immediately apparent for Alice Springs and Tennant Creek, so further analysis is required for these locations. (Katherine has similar price movements to Darwin.)



The following chart examines Alice Springs and Tennant Creek prices with TGP lagged 28 days. It can be seen there is good correlation of the retail price and TGP data series. In other words, prices in these locations track TGP, although with twice the lag experienced in Darwin.



2. Price structure from public data

In Caltex's supplementary submission, we state

In Caltex's view, the price structure of petrol is best understood, particularly on a short term basis, by knowledge of the retail price, any retail discounts, freight costs, terminal gate prices, and import prices.

How can this be done in practice? The follow set of charts steps through the process, culminating in a table showing the structure of Darwin prices. This data is available to anyone with a computer.



Petrol excise from ATO website

Excise	Excise rates	
Excise licences	Excise rates are expressed per:	
goods	multiplying the actual volume of product by its alcoholic strength (for beer, the first 1.15% of alcohol content is free of excise duty)	Petrol excise rate from ATO website = 38.9 Acpl
Reporting exclose and parting duty Claiming exclose refunds, drawbacks and remissions Reeping accurate works excerts	Itre, kilolite or kilogram of product for fuel and petroleum products including gaseous fuels stick for cigarettes and cigars where the weight per stick does not exceed 0.8 grams actual tobacco content and kilogram for all other tobacco products. Rates The rates, together with precise product definitions and descriptions, are set out in	
Excise equivalent goods	 Find out more 	
Concessional spirits	Access the latest duty rates on the Exclose farm working pages and associated by-laws ²⁷ on our legal database.	

-	10.5	L	Gasoline (other than for use as fuel in aircraft)	\$0.389 per litre
A	10.6	L	Gasoline for use as fuel in aircraft	\$0.03556 per litre
~	10.7	1	Blends of gasoline and ethanol	The amount of duty worked out under section 6G (using \$0.389 per litre at step 3 at 6G)
-	10.10	L	Diesel (other than biodiesel)	\$0.389 per litre

Terminal gate price from AIP website

Terminal Gate Prices

Five weekdays to Thursday, 12 February 2015

Petrol (ULP, cents per litre, inclusive of GST)

Dick on any location name to see more data for that area					
Friday 6 February 2015	Monday 9 February 2015	Tuesday 10 February 2015	Wednesday 11 February 2015	Thursday 12 February 2015	
109.6	110.9	113.0	114.1	114.9	
109.0	110.3	112.4	113.5	114.3	
109.1	110.3	112.4	113.5	114.3	
108.8	110.0	112.1	113.2	114.0	
109.5	110.6	112.5	113.6	114.4	
112.4	113.7	115.8	116.9	117.7	
115.2	116.3	118.4	119.3	119.9	
	Friday 6100 America base more Friday 109.6 109.0 109.1 100.8 109.5 112.4 115.2	Microbio Microbio 109.6 110.9 109.6 110.3 109.1 110.3 109.5 110.0 109.5 110.6 112.4 113.7 115.2 116.3	Visitary Direct data for that area Fridary Truesday Truesday 0 February 2015 3 February 2015 10 February 2015 109.6 110.9 113.0 109.0 110.3 112.4 109.1 110.0 112.1 109.5 110.6 112.5 112.4 113.7 115.8 115.2 116.3 118.4	Vietness Vietness 1 Friday Friday Monday 10 Friday 11 Friday 11 Friday 109.6 110.9 10 Friday 11 Friday 11 Friday 11 Friday 109.6 110.9 113.0 114.1 109.0 110.3 112.4 113.5 109.1 110.3 112.4 113.5 109.5 110.6 112.1 113.2 109.5 110.6 112.5 113.6 112.4 113.7 115.8 116.9 115.2 116.3 118.4 119.3	

AIP publishes average of daily TGPs published by fuel suppliers – or can look up individual supplier websites. Average TGP on 12 February = 117.7 cpl

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Retail price from AANT website (MotorMouth)

Unleaded fuel prices for the Northern Territory:

Suburb	Name	Address	Price
Berrimah	Caltex Berrimah	Stuart Highway	126.9
Berrimah	Gull Pinelands	890 Stuart Highway	126.9
Berrimah	Puma 11 Nile	Stuart Highway	126.9
Berrimah	Puma Truck City	3921 Berrimah Road	126.9
Casuarina	BP Casuarina Cityway	Trower Road	126.9
Casuarina	Caltex/Woolworths Casuarina, Nt	Lot 9288 Trower Road	126.9
Coolalinga	Caltex/Woolworths Coolalinga	20 Henning Road	126.9
Danvin	United Dankin	Smith Street	126.7
Danvin	BP Darwin City	89 Smith Street	126.9

These pricing components can be combined to show the complete cost structure for ULP on 12 February 2015. A very similar process can be followed for retail diesel. Note that this price structure is indicative as it does not allow for lags in the response of retail prices to TGP, or TGP to the Singapore price.

Petrol price structure from public data

Price component	Price (Acpl)	Note
Singapore price	56	From AIP website chart
Int'l freight and charges, terminal cost and wholesale margin	12	By difference from TGP and cost/tax components
Excise	39	From ATO schedule
10% GST (included in TGP)	11	
Terminal gate price	118	AIP average of supplier TGPs
Retail margin, inland freight and GST on margin	11	By difference
Retail price	127	Typical price per AANT
NOTE: This analysis is indicative and does not take into account lags between pricing components		For example, TGP is based on a 7 day rolling average of Singapore prices and retail prices lag TGP changes