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Genesis supports GIC's work to enable AGMI

Genesis Energy Limited (**Genesis**) supports the Gas Industry Company's (GIC's) work to enable uptake of advanced gas metering infrastructure (AGMI). Combined, Genesis and Frank have over 129,000 natural gas connections. Genesis, together with Vector Metering Limited, was the first energy retailer in New Zealand to offer its customers advanced gas meters, and we have over 50,000 installed smart gas meters (including both Genesis and Frank brands). We are committed to empowering our customers through technology, and our customers with installed smart gas meters can already access hourly gas consumption data through our online Energy IQ customer platform.

Consistent with our response to the GIC's earlier 2021 consultation papers on AGMI, we agree the AGMI Working Group is the appropriate forum for development of detailed non-regulatory guidelines and look forward to continuing to work constructively as part of this Working Group. As per our previous submission, we continue to believe the AGMI Working Group should prioritise initiatives that will have the greatest benefit for consumers and industry. We are therefore pleased to see GIC has further rationalised the number of Type A priority issues.

Consumers will receive greatest benefit from AGMI if deployment balances competition with the ability to innovate. Accordingly, in our view, the highest priority work will focus on developing guidelines to ensure the efficient interoperability of systems that rely on metering data. For consumer data, we agree standardisation will be beneficial, particularly where the AGMI Group can leverage existing standards and processes (i.e. for electricity metering), particularly given the number of dual-fuel retailers.

Similarly, we are supportive of the proposal to integrate AGMI data into the Reconciliation Rules and the proposals relating to the D+1 system and D+1 allocation process. Complying with changes to the Reconciliation Rules proposed by the GIC will require gas retailers to implement system and technology changes. Further consultation with industry on specific Rule changes will therefore be critical to ensuring such Rule and D+1 changes are well signalled in advance and give industry sufficient time to plan and future-proof their systems.

To maximise efficiency and minimise unnecessary costs to both industry and government, it will be important to ensure non-regulatory and regulatory measures implemented under the AGMI work-stream are aligned to other relevant initiatives, notably the proposed consumer

data right regime being developed by MBIE under the Consumer and Product Data Bill, as well as the Gas Consumer Care Guidelines where relevant.

Priority A Issues

1 Access to, use and security of consumer data

We agree with the GIC's recommendation to develop gas industry specific guidance that addresses the identified issues and that a non-regulatory approach is appropriate. We also agree that the AGMI Working Group is an appropriate forum for developing these guidelines.

As noted in the paper, it will be important to ensure alignment between voluntary guidelines for AGMI and any standards impacting gas metering under the Consumer and Product Data Bill, as well as Gas Consumer Care Guidelines where relevant.

We agree with leveraging existing data standards, formats and processes in use for electricity metering, for example electricity information exchange protocols (EIEPs), as these are known to industry and will make implementation more efficient. Similarly, we agree with a duration of 24 months for retention of data, and with a timeframe of 5 working days to respond to requests, to align with guidelines for electricity data.

Third party consent for access to consumer data

We agree there will be efficiency benefits from standardising processes for consumer consent to third-party access to consumer data. Leveraging existing processes used for the electricity sector makes sense.

We would also advocate for standardising the required frequency of consent renewals with other regimes. Requiring customer consent renewals for data access for third parties annually would seem to strike the right balance between efficiency and appropriate respect for customer rights. In addition, consent could be required prior to entering any new contract for gas supply or metering.

It may make sense to leverage the third-party accreditation approach proposed under the Consumer and Product Data Bill.

2 Minimum data standards and file formats

Consistent with our previous submission, we agree that guidance on AGMI minimum data standards and file formats would be beneficial and that the GIC's proposed non-regulatory approach is appropriate.

We would also reiterate our previous comment that priority should be given to developing guidelines that include a minimum dataset for delivery MSPs are expected to supply irrespective of any additional service or dataset they may offer as a differentiator from competitors.

4 Downstream reconciliation rules and D+1

Consistent with our previous submission, we agree that changing downstream reconciliation and registry rules and processes is necessary to efficiently integrate AGMI and ensure full

consumer benefits can be realised, and that this should include consideration of how AGMI data is integrated into the D+1 allocation process.

Complying with changes to the Reconciliation Rules and D+1 proposed by the GIC will require gas retailers to implement system and technology changes. Further consultation with industry on specific Rule changes will therefore be critical to ensuring such Rule changes are well signalled in advance and give industry sufficient time to plan and future-proof their systems. The sooner the detailed specifications of Rule changes (for example file format specifications and G1M determinations) are confirmed the better, as this will give retailers certainty.

4.2.1 Allocation group definition

We agree with the GIC's proposal to use the allocation field to differentiate between legacy and smart meters. Our preference would be to use one of the existing codes not currently in use, i.e. either allocation group 3 or 5.

4.2.4 Allocation methodology and UFG calculation

We agree with the proposal to change the allocation methodology and UFG calculation, as this will make the allocation of costs under the Rules fairer.

4.2.6 Residual profile and daily shape values

While we see the merit in principle, we would question whether the benefits will be sufficient to justify the costs of implementing this. As you mention in this consultation paper the gas market has little volatility due to contracted wholesale prices, spot market exposure, load control capability, etc). In addition to this, as AGMI rollout increases the profile will become increasingly aligned to GXP injection volumes.

11 Advanced Metering Consumer Education – recommends that retailers and Gas NZ provide consumers education with support of GIC.

We would welcome more consumer information from the GIC or Gas NZ. There would be value in having this information made available by an independent organisation. In our experience, customers who are sceptical about adopting smart gas meters are more likely to believe or accept as authoritative information provided by independent (non-commercial) organisations.

Yours sincerely,



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