# Template for submissionson the 8 December 2017 GTAC and guidance for submitters

## Invitation for submissions

In Gas Industry Co’s 11 December 2017 News Bulletin we invited stakeholders to provide submissions to assist Gas Industry Co make an assessment of whether the 8 December Gas Transmission Access Code (GTAC) is materially better than the current terms and condition of access to and use of the gas transmission pipelines. The deadline for submissions is **5.00pm on Monday, 22 January 2018**. Late submissions may not be considered.

## Context

With the help of stakeholders, First Gas has developed the GTAC as a replacement for the existing Maui Pipeline Operating Code (MPOC) and Vector Transmission Code (VTC). First Gas hopes to introduce the GTAC on 1 October 2018.

The VTC will expire 30 September 2018 (unless extended), but the MPOC can only be replaced when the conditions set out in MPOC s22.16 are met. The substantive condition is that:

following an appropriate consultation process which includes GIC publishing a draft determination and asking each shipper and Welded Party whether it supports the New Code, GIC has published a final determination that the New Code is materially better than the current terms and conditions for access to and use of gas transmission pipelines having regard to the objectives in section 43ZN of the Gas Act 1992 and any objectives and outcomes the Minister has set in accordance with section 43ZO of the Gas Act 1992;

MPOC clause 22.16(b)

It is in relation to this condition that Gas Industry Co invites stakeholders to make submissions.

## Timetable

Gas Industry Co published the following timetable for its assessment of the GTAC:

|  |  |
| --- | --- |
| Process | Date |
| Stakeholders provide submissions to Gas Industry Co on the final GTAC submitted to Gas Industry Co on 8 December 2017 | Monday, 22 January 2018 |
| Gas Industry Co issues its preliminary assessment of the new GTAC (termed a “draft determination” in the MPOC) for consultation with stakeholders | Monday, 12 February 2018 |
| Stakeholders provide submissions to Gas Industry Co on the preliminary assessment of the new GTAC | Monday, 19 March 2018 |
| Gas Industry Co issues its final assessment (termed a “final determination” in the MPOC)  | Friday, 20 April 2018 |

## Guidance for submitters

You can express whatever views and provide whatever supporting information you consider relevant to Gas Industry Co’s assessment of whether the proposed GTAC access arrangements are materially better than the current access arrangements (ie, the MPOC and VTC arrangements across the entire gas transmission system[[1]](#footnote-1)). However, it would be particularly helpful to our analysis if can explain how a move to the proposed GTAC arrangements would affect your business.

Ideally, your submissions should address the following matters:

1. To what extent is your company involved in any or all of the following:
	1. Production
	2. Treatment
	3. Interconnection
	4. Transport
	5. Trading
	6. End-use
2. What are the main aspects of the proposed GTAC access arrangements that are better than the current access arrangements, and why?
3. What are the main aspects of the proposed GTAC access arrangements that are worse than the current access arrangements, and why?
4. In responding to questions 2 and 3, it would help if you can identify which particular aspects of the GTAC are relevant, and what the practical effect on your business would be (more/less cost, more/less processes etc).
5. In assessing why some particular aspect of the GTAC is better or worse, it may help to consider how they may contribute to:

**Efficiency**

* Promoting the efficient use of gas pipelines to deliver gas to consumers
* Improving the incentives for investment
* Reducing barriers to competition
* Facilitating competition in upstream and downstream gas markets
* Increasing downward pressure on delivered gas costs and prices
* Promoting access to essential infrastructure and competitive market arrangements
* Signalling the full costs of transporting gas to consumers
* Enabling consumers to make trade-offs between quality and price

**Reliability**

* Reducing the risk of interruption or contingency

**Safety**

* Reducing the risk of harm to people or property

**Environment**

* Reducing the likelihood of harm to the environment

**Fairness**

* Being more fair to industry participants

## Suggested template for submissions

You may find a tabular format such as this useful:

|  |  |
| --- | --- |
| Aspect | Why it is better or worse |
| **Gas transmission products** |  |
| GTAC s2 Transmission Services |  |
| GTAC s3 Transmission Products and Zones |  |
| GTAC s7 Additional Agreements (Supplementary Agreements (SAs) and Interruptible Agreements (IAs)) |  |
| GTAC s4 Nominations |  |
| **Pricing terms** |  |
| GTAC s11 Fees and Charges |  |
| **System operation** |  |
| GTAC s5 Energy Quantity Determination |  |
| GTAC s6 Energy allocations  |  |
| GTAC s7 Additional Agreements (Interconnection Agreements (ICAs)) |  |
| GTAC s8 Balancing  |  |
| GTAC s9 Curtailment  |  |
| GTAC s10 Congestion Management  |  |
| GTAC s12 Gas Quality |  |
| GTAC s13 Odorisation |  |
| **Governance** |  |
| GTAC s14 Prudential Requirements |  |
| GTAC s15 Force Majeure |  |
| GTAC s16 Liabilities |  |
| GTAC s17 Code Changes |  |
| GTAC s18 Dispute Resolution |  |
| **Other matters** |  |

## Confidentiality

Please note that Gas Industry Co intends to publish all submissions that it receives. You should not upload any submission to our website that has confidential or commercially sensitive information.

If you wish to provide us with information that you consider to be confidential or commercially sensitive please contact Gas Industry Co to discuss.

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1. Although Gas Industry Co’s assessment relates to the substantive condition in the MPOC, that condition refers to “…materially better than the current terms and conditions for access to and use of gas transmission pipelines…”. The use of the plural makes it clear that the analysis is intended to encompass the total gas transmission system. [↑](#footnote-ref-1)