Questions

###### Options for Information Disclosure in the Wholesale Gas Sector

Submission prepared by:

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| Question | | Comment |
| Q1: | Should shippers be included in an information regime? If so, what information do you consider should be disclosed? |  |
| Q2: | Is the information currently disclosed by the transmission pipeline operator sufficient? If not, what further information should be released through information disclosure arrangements? |  |
| Q3: | Have the upstream sector and its potential information issues been characterised appropriately? Have we missed aspects of the problem or are there parts of the identified problem that we have not described correctly? Please include details and any examples in your response. |  |
| Q4: | Have the demand-side and its potential information issues been characterised appropriately? Have we missed aspects of the problem or are there parts of the identified problem that we have not described correctly? Please provide details and any examples in your response. |  |
| Q5: | What processes does your organisation have to obtain information ahead of, and during, periods of reduced gas supply? |  |
| Q6: | How is your organisation impacted during periods of reduced gas supply? Please provide details (including costs) and any examples in your response. |  |
| Q7: | What steps does your organisation’s risk assessment or business continuity plan expect to be undertaken to limit the impact of periods of reduced gas supply? |  |
| Q8: | Taking into account your risk assessments and business continuity plans, what information do you use and what further information would be useful to your organisation to inform your actions and decisions during periods of reduced gas supply? |  |
| Q9: | Is there any further information regarding outages that you would like to share? |  |
| Q10: | Have the potential information problems in the wholesale gas market been identified appropriately? Have we missed aspects of the problem or are there parts of the identified problem that we have not described correctly? Please provide details and any examples in your response. |  |
| Q11: | Have the potential information transparency and availability issues in the wholesale gas sector been analysed appropriately against the Gas Act and GPS objectives? Are there elements of the analysis that have been missed or parts of problem that have not been analysed properly? Please explain your reasoning. |  |
| Q12: | Has the proposed problem statement been characterised appropriately? Have we missed aspects of the problem or are there parts of the identified problem that we have not described correctly? Please include details and any examples in your response. |  |
| Q13: | Has the voluntary disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response. |  |
| Q14: | Do you agree with the advantages that have been identified for the option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised? |  |
| Q15: | Do you agree with the disadvantages that have been identified for the option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised? |  |
| Q16: | Given the advantages and disadvantages, do you consider that that voluntary disclosure option is a viable option? Please provide the reasoning behind your answer, including details and any examples. |  |
| Q17: | Has the principles-based information disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response. |  |
| Q18: | Do you agree with the advantages that have been identified for the option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised? |  |
| Q19: | Do you agree with the disadvantages that have been identified for the option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised? |  |
| Q20: | If a principles-based information disclosure option is adopted do you think there should be exclusions on information that is disclosed? If so, what types of exclusion should be considered and why? If confidentiality is a concern, please explain why this is the case, including any details and examples. |  |
| Q21: | Has the specific information disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response. |  |
| Q22: | Do you agree with the advantages that have been identified for the option? Have any other advantages been missed or are there advantages that have been listed that are mischaracterised? |  |
| Q23: | Do you agree with the disadvantages that have been identified for the option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised? |  |
| Q24: | Have the implementation issues associated with the information disclosure options been characterised appropriately? Are there further points that we have missed or are there issues that have been mischaracterised? |  |
| Q25: | Do you think that principles-based information disclosure based on industry-led arrangements is a viable option? Please provide the reasoning behind your answer. |  |
| Q26: | Do you agree with the proposed coverage for disclosure obligations? What issues do you see with the proposed coverage? |  |
| Q27: | Should there be coverage exclusions (i.e. particular parties or types of party) included in the information disclosure regime? If so, what should they be and why (please provide details and examples to support your argument)? |  |
| Q28: | Should there be a minimum threshold? If so, what should it be and what should it be based on (e.g. nameplate capacity, X GJ/day)? Should the minimum threshold be the same for all types of market participants or should it vary between market segments? Please provide details. |  |
| Q29: | Should the threshold be on a facilities basis or company basis? |  |
| Q30: | Are there any other information disclosure rules that should be considered? Please provide details in your answer including the rationale for your proposed rules. |  |
| Q31: | Has this planned outage disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response. |  |
| Q32: | Do you agree with the advantages that have been identified for the planned outage disclosure option? Have any other advantages been missed or are there advantages that have been listed that are mischaracterised? |  |
| Q33: | Do you agree with the disadvantages that have been identified for the planned outage disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised? |  |
| Q34: | If this planned outage disclosure option is adopted do you think there should be exclusions on information that is disclosed? If so, what types of exclusion should be considered and why? If confidentiality is an issue, please explain why this is the case, including any details and examples. |  |
| Q35: | Has this unplanned outage disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response. |  |
| Q36: | Do you agree with the advantages that have been identified for the unplanned outage disclosure option? Have any other advantages been missed or are there advantages that have been listed that are mischaracterised? |  |
| Q37: | Do you agree with the disadvantages that have been identified for the unplanned outage disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised? |  |
| Q38: | If this unplanned outage disclosure option is adopted do you think there should be exclusions on information that is disclosed? If so, what types of exclusion should be considered and why? If confidentiality is an issue, please explain why this is the case, including any details and examples. |  |
| Q39: | Should lagged emsTradepoint traded volumes and prices be disclosed under an information disclosure regime? Please provide reasons in your response. |  |
| Q40: | Do you agree with the advantages that have been identified for the emsTradepoint disclosure option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised? |  |
| Q41: | Do you agree with the disadvantages that have been identified for the emsTradepoint disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised? |  |
| Q42: | Should there be publication of weighted average wholesale prices & aggregate traded volumes that cover the entire gas wholesale sector (with data sources including price and volume information covered under bilateral agreements and other arrangements)? |  |
| Q43: | Do you agree with the advantages that have been identified for this weighted average price & volumes option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised? |  |
| Q44: | Do you agree with the disadvantages that have been identified for this weighted average price & volumes disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised? |  |
| Q45: | Are there confidentiality issues that would limit this option? Please provide details on any confidentiality concerns. |  |
| Q46: | Should a twelve-month outlook for gas production information (‘gas production information’) be disclosed under an information disclosure regime? Please provide reasons in your response. |  |
| Q47: | Do you agree with the advantages that have been identified for this ‘gas production information’ disclosure option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised? |  |
| Q48: | Do you agree with the disadvantages that have been identified for this ‘gas production information’ disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised? |  |
| Q49: | Are there confidentiality issues that would limit this ‘gas production information’ disclosure option? Please provide details and any examples. |  |
| Q50: | Should a twelve-month outlook for major users’ gas consumption information (‘gas consumption information’) be disclosed under an information disclosure regime? Please provide reasons in your response. |  |
| Q51: | Do you agree with the advantages that have been identified for this ‘gas consumption information’ disclosure option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised? |  |
| Q52: | Do you agree with the disadvantages that have been identified for this ‘gas consumption information’ disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised? |  |
| Q53: | Are there confidentiality issues that would limit this ‘gas consumption information’ disclosure option? Please provide details and any examples. |  |
| Q54: | Have any publication channels been left out of the identified channel list? Are there channels in the list that should be excluded? Please provide details in your response. |  |
| Q55: | What do you consider to be the pros and cons of the various options that have been identified and other options that should be considered? |  |
| Q56: | Have you got any comments on the benefits analysis? |  |
| Q57: | Could you please provide Gas Industry Co with estimates of your expected costs associated with the implementation and ongoing management of the various information disclosure options? This cost information is important for completing a full cost/benefit analysis. |  |