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Genesis Power Limited
trading as Genesis Energy

Fax: 04 495 6363

13 July 2010

Ian Wilson
Gas Industry Company Ltd
95 Customhouse Quay
WELLINGTON

By email: submissions@gasindustry.co.nz

Dear Ian

MPOC Change Request Final Recommendation

Genesis Power Limited, trading as Genesis Energy, welcomes the opportunity to provide a submission to the Gas Industry Company (GIC) on the consultation paper "17 December 2009 MPOC Change Request: Final Recommendation" dated 2 July 2010.

Genesis Energy supports the GIC's final recommendation to not support the December 2009 change request. As outlined in our prior submission¹, we have a number of material concerns with the change request and regardless of the benefits from some of the balancing aspects, we do not support the change request in its current form.

Genesis Energy prefers the qualitative evaluation approach taken by the GIC in this paper. We believe this has more accurately highlighted the issues with the change request and has enabled the GIC to reflect further on issues such as the balance of risk between parties.

Genesis Energy believes that GIC's decision will incentivise Maui Development Limited (MDL) and other parties to submit future change requests that are more focused and deal with only one or closely related issues. We recommend that the GIC reviews and amends either the Maui Pipeline Operating Code change

¹ MPOC Change Request Draft Recommendation, 8 July 2010.

request process or the GIC's Memorandum of Understanding with MDL, to reinforce this point.

Genesis Energy will continue to work with MDL and other parties on future change requests, so that the constructive work that has gone into transmission pipeline balancing over recent months can be utilised and progressed.

If you would like to discuss any of these matters further, please contact me on 04 495 6354.

Yours sincerely

A handwritten signature in black ink that reads "K/Boyes". The signature is written in a cursive, flowing style.

Karen Boyes
Senior Regulatory Advisor