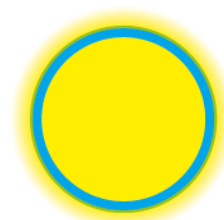


13 March 2015

Ian Dempster
 Gas Industry Company
 PO Box 10 646
 WELLINGTON 6143

[Submitted via Gas Industry Co website]



Dear Ian

Powerco Submission on Draft Gas Quality: Requirements and Procedures

Powerco welcomes the opportunity to comment on Gas Industry Company's (the GIC) draft protocol *Draft Gas Quality: Requirements and Procedures* (the Protocol), published on 15 February 2015.

Powerco views the development of the Protocol by the GIC as a positive step that supports the industry to work collaboratively to ensure that legal obligations are met and the networks operate safely and effectively. We consider that a robust consultation process, notably the industry workshops, has led to the development of a fit for purpose Protocol.

In general we support the drafting of the Protocol; however, there are two areas that we consider require amendment to ensure effective management of the network and the health and safety of those working on the network. The proposed amendments are highlighted in red below.

1. An addition to section 5: Obligations and means of compliance, sub-section 5.3 Pressure (p. 40).

Wholesalers/Retailers (W/R) Gas pressure obligations and actions	
Obligation	Each W/R must ensure that gas it supplies at a consumer's point of supply is at a pressure that ensures the safe supply, passage, and use of the gas, where the gas is used for its intended purpose in a properly functioning gas installation. (SM Regulation 42)
Means of Compliance	Each W/R will hold service provider agreements with TSOs and/or NOs and/or GMSOs, with delivery pressure related provisions. Also, each W/R will promptly advise their customers of any breach of SM Regulations 42, giving full details. Maintain and share with NO consumption profiles of industrial customers (greater than 10TJ) or customers on networks where capacity is limited in order that NO is able to maintain pressure requirements across its distribution networks.

2. Communications arising from an NO discovering odorant fade: (Bullet point 3, p. 45).

As an RPO, the NO will advise gas retailers who supply consumers on the affected section of the distribution network and, ~~if necessary~~, Vector and GMSOs, of the incident, the proposed remedy, and when the problem is expected to be resolved.

Thank you for the opportunity comment further on the draft Protocol before its finalisation. If the GIC wishes to discuss any aspects of this submission, please contact Oliver Vincent in the first instance at tel. (06) 757 3397 or oliver.vincent@powerco.co.nz .

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Fletcher', written in a cursive style.

Richard Fletcher
General Manager Regulation and Government Relations