



## GREYMOUTH GAS

14 August 2012

Ian Dempster  
Principal Advisor - Markets  
Gas Industry Company Limited  
PO Box 10 646  
Wellington 6143

Dear Ian,

**RE: Proposed Revised Guidelines for Essential Service Providers and Minimal Load Users 2012**

Greymouth Gas New Zealand Limited ("Greymouth Gas") is pleased to make a submission on the Proposed Revised Guidelines for Essential Service Providers and Minimal Load Users 2012 (the "paper") following an invitation from the Gas Industry Company Limited ("GIC") on 2 August 2012.

Greymouth Gas has the following comments:

- We question why the paper is being considered in advance of a forthcoming review of the Gas Governance (Critical Contingency Management) Regulations 2008 (the "regulations"). This is back-to-front and inefficient.
- The paper contains a number of 'idealistic' interpretations which are a long way away from a real-world, business and legal interpretation of the status quo regulations.
- If GIC wants to apply its own interpretation of how to apply essential service provider designations, then GIC should be the central agency responsible for doing the same.
- The revisions to the considerations section in the paper read as if GIC is trying to retrospectively apply policy and intent to the regulations, when the formal angle to do so is via a review of the regulations not via an updated interpretation of the same.

Greymouth Gas considers that the guideline note and paper should be shelved, or put on hold until after a review of the regulations.

Yours sincerely,

Chris Boxall  
Commercial Manager