

19 December 2019

Ian Wilson
Gas Industry Company Limited
Level 8, The Todd Building
95 Customhouse Quay
PO Box 10 646
Wellington

Dear Ian

By email: consultations@gasindustry.co.nz

Information Disclosure: Problem Assessment

Thank you for the opportunity to comment on the GIC's consultation on information disclosure.

Contact Energy supports improved information disclosure in the gas industry and considers it important for the efficient functioning of both the gas and electricity markets.

Contact generally supports the GIC's proposed approach and information that would form part of the development of a Statement of Proposal under Section 43N of the Gas Act. We also continue to work in parallel with a proposed industry-led information disclosure regime on planned and unplanned outages.

We are happy to discuss and provide further information on the matters raised in this letter. Please don't hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Sharon Wray".

Sharon Wray

Fuels Manager

SUBMISSIONS TEMPLATE

Information Disclosure: Problem Assessment

Submission prepared by: **Contact Energy**

Question	Comment
Q1: <i>Do you have any comments on our approach to the analysis?</i>	No further comment
Q2: <i>Have we identified all of the relevant information elements in this list?</i>	Yes. Nothing further to add.
Q3: <i>Do you agree with our assessment for gas production outage information? Have we missed aspects of the issue or are there parts that have not been described correctly? Please include details and any examples in your response.</i>	Yes. No further comment.
Q4: <i>Do you agree with our assessment for major gas user facility outage information? Have we missed aspects of the issue or are there parts that have not been described correctly? Please include details and any examples in your response.</i>	Agree with analysis. No further comment.
Q5: <i>Do you agree with our assessment for gas storage outage information? Have we missed aspects of the issue or are there parts that have not been described correctly? Please include details and any examples in your response.</i>	Yes
Q6: <i>Do you agree with our assessment for transmission pipeline outage information? Have we missed aspects of the issue or are there parts that have not been described correctly? Please include details and any examples in your response.</i>	Yes. We agree that consistency of transmissions outage information will improve under GTAC and its associated IT systems.
Q7: <i>Do you agree with our assessment for contract price and volume information? Have we missed aspects of the issue or are there parts that have not been described correctly? Please include details and any examples in your response.</i>	Yes. Contact would support the publication of weighted average prices and volumes from gas traded under GSAs, however we agree that the bespoke nature of current gas contracts means they do not easily compare and as a result the publication of weighted average prices and volumes would not necessarily provide useful information.
Q8: <i>Do you agree with our assessment for emsTradepoint price & volume information? Have we missed aspects of the issue or are there parts that have not been described correctly? Please include details and any examples in your response.</i>	We agree the emsTradepoint price and volume information would not be required under a Statement of Proposal, given parties have current read-only access to the platform today.
Q9: <i>Do you agree with our assessment for gas storage facilities information? Have we missed aspects of the issue or are there parts that have not been described correctly? Please include details and any examples in your response.</i>	No further comment.
Q10: <i>Do you agree with our assessment for gas production forecast information? Have we missed aspects of the issue or are there parts that have not been described</i>	Yes. Timely access to data is essential, and we support GIC discussing opportunities for earlier access to the MBIE annual gas production forecasts.

<p><i>correctly? Please include details and any examples in your response.</i></p>	
<p>Q11: <i>Do you agree with our assessment for thermal electricity generator gas position information? Have we missed aspects of the issue or are there parts that have not been described correctly? Please include details and any examples in your response.</i></p>	<p>We agree with GIC's proposal that this is not dealt with under the Statement of Proposal. We will work with EA as it progresses its Wholesale Market Information Disclosure project.</p>
<p>Q12: <i>Do you agree with our assessment for major users' forecast gas consumption information? Have we missed aspects of the issue or are there parts that have not been described correctly? Please include details and any examples in your response.</i></p>	<p>Agree.</p>

