

22<sup>nd</sup> September 2017

Ian Wilson  
Gas Industry Company  
PO Box 10 646  
Wellington

By email: [info@gasindustry.co.nz](mailto:info@gasindustry.co.nz)

Dear Ian

**Report on how Gas Industry Co would perform a GTAC Change Request**

Contact Energy Limited (Contact) appreciates the opportunity to provide feedback on the Gas Industry's report on how it would perform a GTAC Change Request.

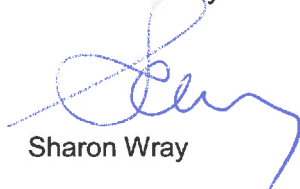
While the report for submission is not in respect of the wording of the GTAC but on how the GIC will perform the role set out in the GTAC, Contact still favours a change process more aligned to the current VTC process. We believe the VTC allows for a more collaborative process to draft the code changes that ultimately result in acceptable changes. Contact also prefers that parties to the code should vote on the final change request rather than the request going to the GIC for its approval.

In Contact's view the main area of concern in the report is to what extent the GIC can suggest further code changes under section 17.11 and the enforceability of those suggestions. Neither is clear in the GTAC nor the report. This needs to be clarified and further codified.

A further area to be clarified in the report is in respect to the ability of First Gas to decline a Change Request. The report states that where the code change would require First Gas to incur capital expenditure or increase operating expenses or costs it may decline to approve the change request. However the draft GTAC allows First Gas to decline the change request if the proposed change would "require First Gas to incur expenditure it could not recover". These statements are quite different and Contact assumes that the code drafting is the correct approach.

Contact is happy to discuss any of the points made.

Yours Sincerely



Sharon Wray