



23 August 2013

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Dear Ian,

Consultation Paper on Special Allocation May – July 2012

Introduction

1. Mighty River Power welcomes the opportunity to provide this submission on the Gas Industry Company's Consultation on the a possible Special Allocation for the Greater Auckland gas gate for the period May – July 2012. No part of the submission is confidential and Mighty River Power is happy for it to be publicly released.

Comments

2. Our responses to the questions raised within the consultation document are as follows:-
 - We consider that the current allocation results for the above period are sufficiently unfair that the Gas Industry Company should direct that a special allocation be undertaken.
 - We can think of no commercial reasons as to why the current allocation results for the period in question should be retained.
 - Our one concern is that care must be taken in the reallocation process so as not to have a detrimental impact on retailers running mismatch positions. We would suggest that the Gas Industry Company considers reallocating the corrected volumes over a number of days if they believe that the reallocation process has the potential to create problems with the running operational imbalance on the pipeline.

Concluding remarks

3. If you would like to discuss any of our above comments directly with Mighty River Power then please do not hesitate to contact me on 06 348 7926 or jim.raybould@mightyriver.co.nz .

Yours sincerely

A handwritten signature in black ink that reads "Jim Raybould". The signature is written in a cursive style with a prominent initial "J" and "R".

Jim Raybould
Gas Manager