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trading as Genesis Energy

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26 October 2011

Ian Dempster
Gas Industry Company
95 Customhouse Quay
WELLINGTON

By email: submissions@gasindustry.co.nz

Dear Ian

Treatment of new Papakura gas gate

Genesis Power Limited, trading as Genesis Energy, welcomes the opportunity to provide a submission to the Gas Industry Company ("the GIC") on the consultation paper "Papakura gas gate and consultation on expanding Greater Auckland grouped gas gate determination" dated 20 October 2011.

We are extremely disappointed that Vector advised affected retailers of the decommissioning of the Papakura three gas gate after the event and that the decommissioning of this gate occurred before a meter was ready on the new gas gate. Although it is only a small gas gate, we have a number of customers supplied via this gas gate and we would expect consultation to be undertaken with market participants prior to any changes being made.

We prefer the "status quo" option outlined by the GIC (option 2) that would see the new gas gate treated on its own for the purposes of allocation and reconciliation. We consider that reconciliation of gas via the existing rules is a much simpler approach, given that a new meter will soon be in place and that the affected gas gates have different network owners (NGC and United Networks). We support the change becoming effective from the first of the month, to avoid the difficulties associated with part-month allocations.

If you would like to discuss any of these matters further, please contact Andrew Maseyk, Reconciliation and Switching Manager, on 07 857 1607 or me on 04 495 6354.

Yours sincerely

A handwritten signature in black ink, appearing to read 'KJ Collins', with a long horizontal flourish extending to the right.

Karen Collins
Senior Regulatory Advisor