

31 March 2010



Vector Limited
101 Carlton Gore Road
PO Box 99882, Newmarket
Auckland 1149, New Zealand
www.vector.co.nz

Corporate Telephone
+64-9-978 7788

Corporate Facsimile
+64-9-978 7799

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

Dear Ian

**SUBMISSION ON PROPOSED VARIATIONS TO EXEMPTIONS
FOR THE HUNUA 3 AND WAVERLEY GAS GATES**

Vector Limited ("Vector") welcomes the opportunity to submit on the proposed exemption for the Hunua 3 gas gate from the application of certain provisions of the Gas (Downstream Reconciliation) Rules 2008, and the proposed variation to the standard exemption for the Waverley gas gate.

Vector supports Greymouth Gas's application for exemption for the Hunua 3 gas gate. We note that there is no UFG to be allocated at this gate (as a direct connect gas gate) and that this exemption will have no effect on the Allocation Agent and other market participants. We understand that such an exemption will be applied in a similar manner to the existing exemptions covering direct connect gas gates.

We also support the proposed amendments to the standard exemption for Vector's unmetered gas gates, which will remove Waverley from the list of unmetered gas gates subject to exemption, following the installation of a meter at this gate.

Attached is a completed submission form.

Thank you for considering this submission. If you have any queries, or require further information, please feel free to contact me at John.Rampton@vector.co.nz or 04 803 9036.

Kind regards

John Rampton
Manager Industry Governance and Policy

Appendix A Recommended Format for Submissions

Submission from: Vector Limited

Contact: John Rampton (John.Rampton@vector.co.nz, 04 803 9036)

Question	Comment
Q1: Do submitters support replacing the urgent exemption DR10-01-U for the Hunua 3 gas gate with a standard exemption under the same terms as the existing direct connect gas gate exemptions?	Vector supports the replacement of the urgent exemption for the Hunua 3 gas gate with a standard exemption. We note that there is no UFG to be allocated at this gate (as a direct connect gas gate) and that this exemption will have no effect on the Allocation Agent and other market participants. We understand that such an exemption will be applied in a similar manner to the existing exemptions covering direct connect gas gates.
Q2: Do submitters support the proposed amendments to the standard exemption DR09-11-S for unmetered gas gates?	Vector supports removing Waverley from the list of connected gas gates that are subject to exemption. It is the appropriate action because a meter has recently been installed at this gas gate.