



Energy Direct NZ Ltd
179 St. Hill St
PO Box 32
Wanganui 4540

20/7

Tel: 06 349 0909

25 September 2012

Fax: 06 345 4931

Freephone: 0800 567 777

Email: enquiries@energydirectnz.co.nz

Web: www.energydirectnz.co.nz

Andrew Walker
Gas Industry Company
PO Box 10-646
Wellington

Dear Andrew

**CONSULTATION ON EXEMPTIONS AND RULE 37 DETERMINATION UNDER THE
GAS (DOWNSTREAM RECONCILIATION) RULES 2008**

Thank you for the opportunity to comment on the Exemptions and Rule 37 Determination Under The Gas (Downstream Reconciliation) Rules 2008. I am responding on behalf of Energy Direct NZ (EDNZ).

We agree with the extension to the existing exemptions and maintaining the rule 37 threshold at 10%.

If you would like to discuss our comments further please contact me by email at tara.gannon@energydirectnz.co.nz or by phone on DDI 06 349 2055. Alternatively you can contact our General Manager, Michael Ram, by email at michael.ram@energydirect.co.nz or by phone on 06 349 0129.

Yours sincerely

A handwritten signature in black ink that reads "Tgannon".

Tara Gannon
Energy Trading Manager

QUESTION	COMMENT
<p>Q1: Do you agree with the proposal to vary all current exemptions by extending the deadline in each case to 30 September 2014?</p>	<p>EDNZ agrees with the extension to extend the following exemptions until 30 September 2014:</p> <ul style="list-style-type: none"> • DR10-03-S • DR10-02-S • DR10-07-S • DR10-06-S • DR10-04-S • DR10-05-S • DR11-01-S.
<p>Q2: Do you agree with the proposal to maintain the rule 37 threshold at $\pm 10\%$ for the gas year beginning 1 October 2012?</p>	<p>EDNZ agrees with maintaining the accuracy threshold at 10%, we do not believe that further tightening of the threshold will improve submission accuracy.</p>