

G005

1 February 2011

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[By email]

Attention: Andrew Walker

Dear Andrew

SUBMISSION ON PROPOSED FILE FORMATS

I thank you for the opportunity to make a submission on the above document and provide the following commentary in addition to the attachment (Appendix A).

GasNet very much welcomes the implementation of gas industry file formats but is disappointed that the process within which the files will operate is unspecified and that GMS has been excluded.

Furthermore it is our view that there should be one industry wide regime for the exchange of information between Network owners, GMS owners and the Energy Retailers and that it is mandated. The use of multiple variations in file formats for different parties is inefficient and cost prohibitive, which if not mandated will inevitably result in GasNet having to wait until all parties are in agreement with the formats and the process.

As a general observation there are a number of aspects that relate directly, or indirectly to functionality within the current Gas Registry and associated Switching Arrangements Rules. GasNet would like to see the existing Gas Registry functionality changed so that it becomes the central depository of information relating to a delivery point ICP. As an example there is an apparent duplication of status codes in the proposed file formats and the Rules as well as the introduction of new codes, all of which should in our view, sit under the same mandatory regime.

Should you wish to discuss any aspect of our submission please do not hesitate to contact me either at (06) 349 0131 or by email at geoff.evans@gasnet.co.nz.

Yours sincerely



Geoff Evans
General Manager

GasNet Limited – Appendix A Submission on Proposed File Formats

Please note that the following comments relate specifically to the questions asked and are supplementary to GasNet’s letter which forms an integral part of its submission.

Submission from: Geoff Evans, General Manager on behalf of GasNet Limited

Question	Comment
<i>Q1: Do you have any comments on the proposed file format 'GIEP1 – Network detail consumption information'? Do you have any further suggestions or modifications to the file format?</i>	<ol style="list-style-type: none">1. There is no time frame specified for submission/receipt of the I, X or R files. If GasNet has completed its billing run any subsequent X or R files will not replace previous data.2. Unless the gas industry is going to change to kWh exclusively then any reference to kWh within this and other File Formats should be replaced with GJ. Although GasNet understands the reasons for billing consumers on the same basis as electricity this should remain at that level. GasNet would be comfortable with either kWh or GJ but not the present confused situation with both.3. Under “Unbilled Status” it is stated that only those ICP’s which are active on the Gas Registry are to be included in the as billed report. GasNet has continued to identify errors and/or timing delays in updating of the Gas Registry and considers that there should be a process to allow pre-billing validation of the databases (Network owner, GMS Owner, Retailer and the Gas Registry).4. If an ICP is Inactive it should still be included within the normalised report but with zero volume. The ICP is still the responsibility of the Retailer according to the Gas Registry and GasNet will still continue its current policy of charging Inactive ICP’s where a GMS remains.5. Within the tables reference to “Party code of sender” (Sender), “Party code of recipient” (Recipient) and “Distributor code” (Distributor ID) should be “Participant Code” consistent with the Switching Arrangement Rules6. The term Unbilled (UB) is unfamiliar to us and therefore we are unsure of its application. If a Retailer has not billed a consumer then we would expect that the consumption would be Estimated (ES)?7. The triplication of consumption in GJ, MJ and kWh makes no sense. It is inefficient and should be rationalised to the industry standard, whether it be GJ, or kWh. If a recipient wishes to hold information in an alternative unit they can apply the appropriate calculation when processing the received file.

Question	Comment
Q2: <i>Do you have any comments on the proposed file format 'GIEP2 – Network summary consumption information'? Do you have any further suggestions or modifications to the file format?</i>	1. Refer comments 2, 5 & 7 in Q1 above.
Q3: <i>Do you have any comments on the proposed file format 'GIEP7 – General installation status change'? Do you have any further suggestions or modifications to the file format?</i>	1. GasNet is concerned with the apparent overlap, in part, with the Status Codes within the Switching Arrangement Rules. Those Codes which are in the Rules should be excluded and it is GasNet's preference that the others are included as an amendment to the Rules and administered through the Gas Registry for consistency. It is undesirable to have a voluntary regime which provides Status Codes that are not mandatory. 2. Refer comment 5 in Q1 above
Q4: <i>Do you have any comments on the proposed file format 'GIEP8 – Network price category and tariff change'? Do you have any further suggestions or modifications to the file format?</i>	1. This appears to be a replication of the Gas Registry and therefore unnecessary. If there are additional requirements within the proposed file format that are not covered in the Switching Arrangements Rules then the Rules and the Gas Registry should be amended.
Q5: <i>Do you have any suggestions for other gas information exchange file formats that could be investigated or adopted?</i>	1. Without the inclusion of GMS File Formats the suite of documents is incomplete. From GasNet's perspective as a Network and GMS Operator we need industry wide standard file formats that cover both Network and GMS information.