

28 January 2011



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Ian Dempster
Principal Adviser – Market Operations
Gas Industry Company
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Dear Ian

Proposed Changes to File Formats

Thank you for providing Vector Limited ("Vector") with the opportunity to provide feedback on the proposed changes to existing file formats, which the Gas Industry Company, industry participants, and Allocation Agent must use for the exchange of information under the Gas (Downstream Reconciliation) Rules 2008.

Vector generally supports the proposed changes to file formats, which we understand, are consistent with protocols in the electricity industry. We believe the changes will contribute to a more efficient downstream reconciliation system; hence, lower costs for industry participants and consumers.

Attached is a completed submission form. If you have any questions, feel free to contact Luz Rose at 04 803 9051 or Luz.Rose@vector.co.nz.

Kind regards

John Rampton
Manager Industry Governance and Policy

Appendix A Format for submissions

Submission from: Vector Limited

Contact: Luz Rose, 04 803 9051 or Luz.Rose@vector.co.nz

Question	Vector's Comment
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?	<p>Vector strongly supports the proposed file format 'GIEP1 – Network detail consumption information'.</p> <p>The consultation paper (under "Unbilled status") mentions that "for the unbilled ICPs the only detail fields required are ICP and status of UB, all other mandatory fields are to be left blank". We note that, at this stage, gas file formats do not indicate what columns are mandatory or voluntary, unlike those used in the electricity sector. In this regard, we suggest that an additional column be added to specify the use of each field, i.e. whether it is mandatory or voluntary.</p> <p>Network detailed consumption information is widely used by distributors and retailers on a monthly basis. Currently, there are many inconsistencies with how this information is formatted by various parties. Users need to re-format a significant amount of information before it can be of meaningful use.</p> <p>We therefore recommend that this proposed format be made mandatory. A consistent format will contribute to the ease of exchanging information, improve understanding between parties, and significantly reduce transaction costs.</p>
Q2: 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?	<p>Vector has no objection to the proposed file format 'GIEP2 – Network summary consumption information'. We rarely use this information and are happy to support the use of this format on a voluntary basis.</p>

Question	Vector's Comment
Q3: 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?	Vector has no objection to the proposed file format 'GIEP7 – General installation status change'. We rarely use this information and are happy to support the use of this format on a voluntary basis.
Q4: 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?	Vector has no objection to the proposed file format 'GIEP8 – Network price category and tariff change'. We rarely use this information and are happy to support the use of this format on a voluntary basis.
Q5: Do you have any suggestions for other gas information exchange file formats that could be investigated or adopted?	No other comments.