



**Vector Limited**  
101 Carlton Gore Road  
PO Box 99882, Newmarket  
Auckland 1149, New Zealand  
[www.vector.co.nz](http://www.vector.co.nz)  
Corporate Telephone  
+64-9-978 7788  
Corporate Facsimile  
+64-9-978 7799

4 February 2013

Andrew Walker  
Adviser  
Gas Industry Company  
PO Box 10-646  
Wellington

Dear Andrew

**Submission on Special Allocations for the Westfield  
and Hunua Gas Gates**

1. Vector Limited ("Vector") welcomes the opportunity to make a submission on the Gas Industry Company's ("GIC") consultation document, released on 29 January 2013, on its special allocation proposals under the Gas (Downstream Reconciliation) Rules 2008 ("the Rules") in respect of the Westfield and Hunua gas gates.
2. Vector agrees with the GIC that a special allocation is not warranted for the Westfield gas gate, where there was under-reporting of injection quantities from mid-May to June 2012 due to a metering error. As indicated by the GIC, the injection information in OATIS has already been corrected, and the Allocation Agent can use this information to calculate the annual UFG factor for Greater Auckland.
3. Vector further agrees with the GIC that a special allocation is not required for the Hunua gas gate, where there was over-submission between October 2011 and August 2012 due to an error in the application of a pressure factor. Interim and initial allocations have already been published and associated invoicing completed. There is also sufficient time for correction of the annual UFG factor to take place.
4. This submission is not confidential and Vector is happy for it to be made publicly available.

5. Vector's contact person for this submission is:

Luz Rose  
Senior Regulatory Analyst  
04 803 9051  
[Luz.Rose@vector.co.nz](mailto:Luz.Rose@vector.co.nz)

Yours sincerely

A handwritten signature in blue ink, appearing to read "B. Girdwood".

Bruce Girdwood  
**Manager Regulatory Affairs**