



**Submission to the Gas Industry Company on its Consultation Paper on
Proposed Determinations and
Notifications under Gas (Downstream
Reconciliation) Rules 2008 and other
Implementation Matters – Part 1 Proposed File Formats**

From

Contact Energy Limited

27 June 2008

Introduction

Contact Energy Limited (“Contact”) welcomes the opportunity to provide feedback on the Gas Industry Company Limited’s (“GIC”) consultation paper. Contact’s answers to the questions asked by the GIC follow. Note that is Part 1 of Contact’s submission and is in regard to the Proposed File Formats.

For any questions related to this submission, please contact:

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Contact's Answers to Questions asked in the Consultation Paper

Question	Comment
<p><i>Q1: Do submitters have any general comments on the proposed File Formats, including any comments on the general issues considered by the IEFFWG and Gas Industry Co in the development of the proposed File Formats? Are there any additional File Formats that submitters consider are required?</i></p>	<p>Information for distributors – It would be appropriate for distributors to receive a modified GIEP31 (please refer to response to question 14 as to the specifics of the modifications proposed). Note that if the Allocation Agent were to make this report available it would need to be distributor specific.</p> <p>It would not be appropriate for distributors to receive GIEP24 (As-Billed); GIEP27 (Meter Reading Frequency) or GIEP30 (Initial v Final Submission). Such reports could be made available by retailers on receipt of a request from a distributor.</p>
<p><i>Q2: Do submitters have any comment on GIEP20, including the additional issues considered in the development of GIEP20?</i></p>	<p>We support the inclusion of the Historic Estimate information in this file rather than report separately. We consider that a site with TOU metering and annual consumption below 10TJ should be validly allocated to allocation group 2 and submitted as daily data in GIEP21. There are several points to note:</p> <ul style="list-style-type: none"> • Consumption varies from month to month and year to year, so it is impossible to always have the correct metering in place for sites that are close to the 10TJ threshold or move above and below the threshold on a rolling 12 months basis. • There should be no barrier to a Retailer installing TOU metering for sites < 10TJ (and paying the extra metering cost) and submitting as daily data and being reconciled as part of the TOU allocation group 2 - i.e. excluded from the residual profile shape applicable to allocation group 4. If a Retailer is incentivised to do this for commercial advantage, then that is competition working - provided the Retailer is not gaming. In this context a Retailer must not be able to retrospectively move an ICP from allocation group 2 to 4 or 4 to 2 in order to obtain the best allocation result for each month, it should only be able to submit data for allocation in accordance with the allocation group in the registry as at the end (or beginning?) of the month and only be able to change the allocation group going forward.

Question	Comment
<i>Q3: Do submitters have any comments on GIEP21?</i>	<p>We consider that a site with TOU metering and annual consumption below 10TJ should be validly allocated to allocation group 2 and submitted as daily data in GIEP21. There are several points to note:</p> <ul style="list-style-type: none"> • Consumption varies from month to month and year to year, so it is impossible to always have the correct metering in place for sites that are close to the 10TJ threshold or move above and below the threshold on a rolling 12 months basis. • There should be no barrier to a Retailer installing TOU metering for sites < 10TJ (and paying the extra metering cost) and submitting as daily data and being reconciled as part of the TOU allocation group 2 - i.e. excluded from the residual profile shape applicable to allocation group 4. If a Retailer is incentivised to do this for commercial advantage, then that is competition working; provided the Retailer is not gaming. In this context a Retailer must not be able to retrospectively move an ICP from allocation group 2 to 4 or 4 to 2 in order to obtain the best allocation result for each month, it should only be able to submit data for allocation in accordance with the allocation group in the registry as at the end (or beginning?) of the month and only be able to change the allocation group going forward. <p>File detail comment: Allocation Group is shown as Char 2 (this differs from GIEP20 which has Char 1). Please note the Registry Detailed Business Requirements from Jade has Char 4 for this field.</p>
<i>Q4: Do submitters have any comments on GIEP22?</i>	No comments.
<i>Q5: Do submitters have any comments on GIEP23 or the additional issues considered in the development on GIEP23?</i>	<p>We recommend that a rule change to rule 40.2 is pursued to require meter reading frequency to be reported monthly rather than annually (the current requirement is to report statistics annually on a rolling 4 month and rolling 12 month basis, which consists of 12 x 4 month rolling and 12 x 12 monthly rolling figures). It would be much more appropriate if the reporting were carried out monthly as this would identify any potential areas of concern in a timely manner rather than waiting for the annual report to be produced. We note that Retailers are probably already running the required reports monthly and collating for an annual submission as required by the current rule, so changing to monthly reporting should be relatively straightforward.</p> <p>File detail comment: The words Non-TOU should be added to the Rule for detail rows 6, 7, 9 and 10</p>

Question	Comment
<i>Q6: Do retailers prefer, from an operational perspective, the provision of meter reading frequency information annually or monthly?</i>	From an operational perspective it would be more appropriate to run and submit the report monthly (and submit using the proposed format.)
<i>Q7: Do submitters have any comments on GIEP24?</i>	No comments.
<i>Q8: Do submitters have any comments on GIEP25?</i>	File header note: Remove UFG from the Rule for Submission Type and replace with Allocation.
<i>Q9: Do submitters have any comments on GIEP26?</i>	<p>We recommend a modification to the detail section of GIEP26. It would be more appropriate for this report to include the UFG information included in GIEP31 in this report rather than include it in the retailer allocation report as it is the same data set across all Retailers. This would mean that GIEP26 would have the Annual UFG factor together with the all Retailer UFG total for the month, the UFG % for the month; the UFG total for the previous 12 months and the UFG% for the previous 12 months. This would result in the reporting of UFG information in a single file and the retailer allocations in GIEP31, which is preferable from an operational perspective.</p> <p>File Detail Comment –UFG % should be expressed as 4 decimal places.</p> <p>A revised GIEP26 is attached for your consideration.</p>
<i>Q10: Do submitters have any comments on GIEP27?</i>	<p>The “Date of the Consumption Day” should be included in this report as required by the rules (the present report format suggests monthly data which is inconsistent with the rules. This is a daily report used for settlement purposes so the breakdown by Allocation Group is inappropriate and unnecessarily complicates the report. We also consider it is unnecessary to include Actual or Estimate. We recommend that the Allocation Group and Actual or Estimate indicators are removed.</p> <p>File Name comment – GIEP27 should be listed as “Daily Retailer Allocation Report”</p> <p>File header comment – the term UFG in the Rule for Report Type should be replaced by Allocation.</p> <p>A revised GIEP27 is attached for your consideration.</p>

Question	Comment
<i>Q11: Do submitters have any comments on GIEP28?</i>	File header comment – the term UFG should be removed from the Rule for Report Type.
<i>Q12: Do submitters have any comments on GIEP29?</i>	No comments.
<i>Q13: Do submitters have any comments of GIEP30?</i>	No comments.
<i>Q14: Do submitters have any comments on GIEP31?</i>	<p>UFG detail should be removed from this report and included in GIEP26. The detail should also be modified to include Retailer Submission GJs as this would give an immediate comparison between the retailer submitted and the allocated volumes. The file should also include the actual annual UFG factor used for the allocation together with data regarding the UFG allocated to the retailer (UFG Total; UFG %; UFG for month etc)</p> <p>File Header Comment – Remove UFG and replace with Allocation in the Report Type Rule.</p> <p>A revised GIEP31 is attached for your consideration.</p>
<i>Other Comments</i>	

GIEP26 All Retailer UFG Report

- UFG total and UFG % for consumption month and for previous rolling 12 months at a Gas Gate level
- Annual UFG Factor used for allocation for the consumption period
 - Rule: (GDRR 46.4.2 and 53.2.3)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	UFG report	ALA-026
Report type	Char (7)	M	I – Initial M - Interim F – Final S - Special	I
Sender	Char (4)	M	Party code of sender	ALLA
Recipient	Char (4)	M	Party code of Recipient	APAR
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of records in report	8

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
Annual UFG Factor	Num (5,4)	M	Annual UFG Factor used for the Consumption Period	1.0102
Effective Date	DD/MM/YYYY	M	Date from which Annual UFG Factor applicable	1/10/2009
UFG% implicit in Annual UFG Factor	Num (3,2) percentage	M	UFG% implicit in Annual UFG Factor	1.01
UFG Total for month	Num (8,3)	M	Total UFG (GJ) for Consumption Period at Gas Gate	499.338
UFG % for month	Num (3,2) percentage	M	UFG for Consumption Period at gas gate expressed as a % of total Gas Gate quantity	0.31
UFG Total for previous 12 months	Num (8,3)	M	Total UFG (GJ) for previous rolling 12 months up to and including consumption period	953.856
UFG % for previous 12 months	Num (3,2) percentage	M	UFG for previous rolling 12 months up to and including Consumption Period expressed as a % of total Gas Gate quantity	0.06
Consumption Period	MM/YYYY	M	Calendar month to which consumption information applies	10/2009

Example (annual UFG report data):

HDR, ALA-026, I, ALLA, APAR, 02/11/2008, 12:32:02, 31
 DET, TWA35610, NETA, 1.01, 1/10/2009, 499.338, 0.31, 953.856, 0.06, 10/2009
 DET, HST05210, NETA, 1.02, 1/10/2009, 915.896, 1.16, 2842.416, 0.36, 10/2009
 etc

GIEP27 Allocation Results for Retailer

- Monthly report of daily allocations made by Allocation Agent by Retailer by Gas Gate for Initial, Interim and Final Allocations
 - Rules: (GDRR 48.2.2 (a); 49.2.2(a); 50.2.2 (a); 51)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
Report Type	Char (7)	M	Allocation Report	ALA-027
File type	Char (1)	M	I – Initial M - Interim F - Final Allocation S - Special	I
Sender	Char (4)	M	Party code of sender	ALLA
Recipient	Char (4)	M	Party code of Recipient	RETA
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of records in report	31

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
Reconciliation Participant	Char (4)		Valid reconciliation code for participant	RETA
Consumption Day	DD/MM/YYYY	M	Date of the Consumption Day for which the allocation has been made	1/10/2008
Allocation (GJ)	Num (8,3)	M	GJ (= kWh x 0.0036)	759.025
Consumption Period	MM/YYYY	M	Calendar month to which consumption information applies	10/2008

Example (monthly allocation):

HDR, ALA-027, I, ALLA, RETA, 02/11/2008, 12:32:02, 31
 DET, TWA35610, NETA, RETA, 1/10/2008, 759.025, 10/2008
 DET, TWA35610, NETA, RETA, 2/10/2008, 712.351, 10/2008
 etc

GIEP31 Monthly Retailer Allocation Report

- Monthly allocation and UFG information specific to each Retailer provided by the Allocation Agent to Retailers after Initial, Interim and Final allocations are performed
 - Rule (GDRR 53.2)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
Report Type	Char (7)	M	Allocation Report	ALA-031
File type	Char (5)	M	I – Initial M -Interim F -Final S - Special	I
Sender	Char (4)	M	Party code of sender	ALLA
Recipient	Char (4)	M	Party code of recipient	RETA
Report Run Date	DD/MM/YYYY	M	Date the report is run	31/10/2009
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
Gas Gate Total for month	Num (8,3)	M	Total Gas Gate throughput in GJ for Consumption Period	158976.321
Annual UFG Factor	Num (5,4)	M	Annual UFG Factor used in allocation	1.0102
UFG % implicit in Annual UFG Factor	Num (3,2) percentage	M	Annual UFG % implicit in UFG Factor	1.01
Retailer code	Char (4)	M	Valid code for retailer	RETA
Retailer UFG Total for month	Num (8,3)	M	Total UFG (GJ) for Consumption Period at Gas Gate allocated to retailer	499.338
Retailer UFG % for month	Num (3,2) percentage	M	UFG for Consumption Period at gas gate expressed as a % of total Gas Gate quantity allocated to retailer	0.31
Retailer UFG Total for previous 12 months	Num (8,3)	M	Total UFG (GJ) for previous rolling 12 months up to and including consumption period allocated to retailer	953.856
Retailer UFG % for previous 12 months	Num (3,2) percentage	M	UFG for previous rolling 12 months up to and including Consumption Period expressed as a % of total Gas Gate quantity allocated to retailer	0.06
Retailer Submission Volume	Num (8,3)	M	Quantity submitted by retailer to Allocation Agent in GJ	4300.987
Retailer Allocation Results	Num (8,3)	M	Quantity allocated to retailer in GJ	4800.325
Consumption Period	MM/YYYY	M	Calendar month to which allocation results & UFG information applies	10/2009

Example (retailer allocation report):

HDR, ALA-031, I, ALLA, RETA, 31/10/2009, 12:32:02
 DET, TWA35610, 158976.321, 1.0102, 1.01, RETA, 499.338, 0.31, 953.856, 0.06, 4300.987, 4800.325, 10/2009
 DET, HST05210, 78956.564, 1.0107, 1.01, RETA, 915.896, 1.16, 2842.416, 0.36, 20024.123, 20940.019, 10/2009