

Submission on the Gas Industry Company's Consultation on Exemption under the Gas (Downstream Reconciliation) Rules 2008

From

Contact Energy Limited

17 December 2010

Summary

Contact welcomes the opportunity to provide feedback on this consultation paper. Specific responses to the questions raised in the consultation paper follow.

Contact is supportive of the exemption being consulted on. It was a practical solution to a unique situation.

For any questions related to this submission, please contact:

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Question	Comment
Q1: Do submitters have any comments on, and/or concerns about, the use of the GGRP as a means of isolating the Nova and E-Gas allocations to those parts of the consumption month for which each of them is the responsible retailer for the E-Gas customer base?	.Contact believes that the method used was appropriate under the circumstances.
Q2: Do submitters agree that there is no reason to extend the expiry date for the existing exemption until 31 December 2011 so as to include the interim and final allocations for the November 2010 consumption period? If not, please provide reasons and an alternative proposal.	Contact agrees with this.
Q3: Do submitters agree that, in order to avoid distortions in the relative values of the SADSV between November 2010 and adjacent months it will be necessary for the allocation group 5 data to be submitted for a special allocation following the interim and final allocation stages? The same consumption volumes will need to be submitted by Nova/E-Gas in allocation groups 4 and 6 for the normally-scheduled interim and final allocations.	Contact agrees with this.



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