

Grace

Contact submission on this consultation is the following.

Contact is supportive of option 3 whereby the GIC facilitate an off market financial settlement amongst affected participants that would not require First Gas having to reopen 4 years of transmission billing.

Additionally Contact recommends that any Rule 37.2 settlement calculations relating to his pipeline that were performed prior to this breach being identified and quantified, is recalculated and these revised cost allocations be included in this settlement agreement. While the 37.2 breaches have now been closed and settlements of these have now completed – these settlements were based on the expectation that the final allocation quantities were materially accurate. This breach (2018-169) has shown this expectation is not the case and other participants have had to wear the financial impact of these costs when their contribution to the impact of these submission accuracy breaches is much lower than originally believed.

Our last comment in regarding this breach at GMM08801 is in relation to the Gas Event audit performed on this gas gate to investigate the excessive UFG that was occurring. Contact recommends the GIC considers including in its financial settlement a redistribution of the audit costs relating to this event audit from the participants previously identified as being a major contributor of UFG at this gas gate to On Gas as a consequence of this breach.

I am happy to meet with the GIC to clarify our additional comments in relation to this breach.

Regards

Bernie

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