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Mr. John Bright Adviser Gas Industry Company Limited PO Box 10646 Wellington 6143

Dear John,

Please regard this letter as our submission on the Draft Recommendation of the GIC on the VTC Change Request Appeal 14 December 2011. In this letter we will use MDL to refer to the Gas Transmission Business (GTB) of Maui Development Limited.

Because we are not a party to the Vector Transmission Code we would normally not comment on GIC work relating to that. There is one issue in the Draft Recommendation, however, that reflects on MDL and for which we would quickly like to provide a comment.

We note that the Draft Recommendation contains a quoted response from Vector that it "collects balancing costs on behalf of MDL". This quote could be misleading for a casual reader. Vector is a party to the Maui Pipeline Operating Code and incurs balancing charges as a Welded Party under that code directly. We would like to clarify that MDL is not a party to the VTC, does not have any relationship with Vector's shippers, and does not require Vector to recover or collect anything on MDL's behalf.

We have appreciated the opportunity to provide this submission. For any additional questions or clarifications please do not hesitate to contact us.

Yours sincerely,

Jelle Sjoerdsma

Commercial Operator, Maui Pipeline

for Maui Development Limited