



20/7

22 January 2009

Bas Walker
Gas Industry Company Limited
PO Box 10-646
Wellington

Dear Bas

SUBMISSION ON GUIDELINE NOTES FOR THE GAS (DOWNSTREAM RECONCILIATION) RULES 2008

Thank you for giving us the opportunity to comment on the Guideline Notes for the Gas (Downstream Reconciliation) Rules 2008. I am responding on behalf of Energy Direct NZ (EDNZ) the retail division of Wanganui Gas Limited (WGL).

We agree that the proposed guidelines are reasonable. We have made some minor points about the content of some of the guidelines which are described in the table below.

If you would like to discuss our comments further please contact me by email at tara.gannon@energydirectnz.co.nz or by phone on DDI 06 349 2055. Alternatively you can contact our General Manager, Michael Ram, by email at michael.ram@energydirectnz.co.nz or by phone on 06 349 0129.

Yours sincerely

T Gannon

Tara Gannon
Energy Trading Supervisor

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SUBMISSION ON GUIDELINE NOTES FOR THE GAS (DOWNSTREAM RECONCILIATION) RULES 2008

QUESTION	COMMENT
Q1: Do you have any comments on, or suggested amendments to, the proposed “guideline note re rule 47 – force majeure event and annual UFG factor”?	We agree that the guidelines on force majeure appear reasonable. We recommend adding point 3.2(e) to include “inability to access data required by the allocation agent to calculate the annual UFG factors, such that the annual UFG factor for a distribution system would be materially distorted.”
Q2: Do you have any comments on, or suggested amendments to, the proposed “guideline note rules 44 and 51 – correction of allocations by allocation agent and special allocations”?	We agree that the guidelines on correction of allocations by the allocation agent and special allocations appear reasonable. We recommend an amendment to point 2.6(c) to include situations where the financial impact of the change on an allocation participant will be in excess of \$7,000 across all gas gates.
Q3: Do you have any comments on, or suggested amendments to, the proposed “guideline note rule 61 – guidelines for determinations on profiles”?	No.
Q4: Do you have any comments on, or suggested amendments to, the proposed “guideline note rule 64 – referral to industry body of disputed profile determinations”?	No.
Q5: Do you have any comments on, or suggested amendments to, the proposed “guideline note rules 65 to 75 and 80 – the commissioning and carrying out of performance audits and event audits”?	We agree that the guidelines for commissioning and carrying out of performance audits and event audits appear reasonable. In point 1.3(c) the cap should be 1.035 rather than 1.085.

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QUESTION	COMMENT
Q6: Do you have any comments on, or suggested amendments to, the proposed “guideline note re the management of change requests for the allocation system or the provision of services by the allocation agent”?	No.
Q7: Do you have any topics or issues related to the Rules that you would like Gas Industry Co to consider issuing further guidance material on?	No.

