

Appendix A Recommended format for submissions

To assist Gas Industry Co in the orderly and efficient consideration of stakeholders' responses, a suggested format for submissions has been prepared. This is drawn from the questions posed in the body of this Consultation Paper. Submitters are also free to include other material on the exemption applications in their responses.

Submission from: Contact Energy (contact Rod Crone)

Question	Comment
<p><i>Q1: Do submitters have any comments on the exemption DR09-09-S proposed by Vector regarding the requirements of rule 41 and 42 (and as a consequence rules 31 and 48)?</i></p>	<p>Contact does not have any objections to the extension requested under rule 41 of the move of deadline for information from 8am to 12midday including for rules 48 and 31.</p> <p>As to the exemption requested under Rule 42 Contact is concerned that there is increasing momentum to put in place balancing regulations and indications are that TSOs will require Shippers (including retailers who ship on Vector Pipelines) to take full responsibility for balancing. This can only be achieved if there is transparent information available to determine flows on a day and/or daily allocations. Contact believes that Vector must now begin to take responsibility for providing daily information at gas gates so that shippers can make informed decisions as to their imbalance positions. Contact was prepared to agree to leniency in timeframes for providing this information but is not prepared to accept the risk of imbalance when it hasn't the tools to determine that risk.</p> <p>Contact is prepared to accept that gas gates that do not have telemetry metering and are small should be exempt from the requirement to comply with rule 42 on non-business days. However if the gas gate is sufficiently large or has telemetry metering then Vector should begin a project to have this information converted to SCADA and provided on all calendar days.</p> <p>Contact agrees with the point made in the paper that there should be a condition on any further exemption that the TSOs make all reasonable endeavours to be in a position to comply with rule 42 but that the exemption should not extend for a further year but only a further 6 months so that improvements can be assessed.</p>

Question	Comment
<p>Q2: Do submitters have any comments on the exemption application DR09-10-T from Vector regarding the oversized meters at the following gas gates: Flockhouse FLH21901, Te Teko TTK30601 and Rainbow Mountain RBM03101?</p>	<p>Fundamentally Contact considers that gas gate and consumer metering should be subject to the same accuracy requirements as set out in NZS5259, and that if gas throughput reduces materially and moves outside the range within which the meter is "accurate", then the meter should be changed within a reasonable period.</p> <p>Failure to change the meter will impact UFG, and likely result in unfair allocation of UFG where UFG is allocated differently to TOU and non-TOU (fixed annual UFG factors with cap/collar) as it is most likely that error will be with the gas gate meter and the former large customer meter, but not the non-TOU metered loads.</p> <p>If UFG was allocated using the global 1 month UFG methodology this would reduce the impact.</p>
<p>Q3: Do submitters have any comments on the exemption application DR09-11-S from Vector regarding the 9 nominated unmetered gas gates?</p>	<p>Allocation based on consumption submitted by retailers with zero UFG allocated is effectively equivalent to allocation of UFG based on the global 1 month UFG methodology with zero UFG.</p> <p>While Contact supports allocation of UFG based on the global 1 month UFG methodology, there should be a threshold at which gas gate metering is required to ensure UFG is identified and allocated transparently. Contact previously suggested a threshold of a nominal 1,000 GJ in any month. Accordingly Contact considers both PAP06603 and WVY23601 both warrant the installation of gas gate metering.</p> <p>In terms of negative GGRP values, Contact considers that the GGRP should either be based on the non-TOU volume only spread evenly across the days in the month, or spread across the days in the month in accordance with the TOU daily consumption profile.</p> <p>In addition Contact would not want to see any reduction in metered gas gates if a threshold was set as this would be a backwards step.</p>