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Gas Industry Company
PO Box 10-646
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Dear Sir/Madam

EXEMPTION APPLICATIONS DR-09-S, DR09-10-T AND DR-09-11-S

Thank you for the opportunity to comment on Exemption Applications DR-09-S, DR09-10-T and DR-09-11-S under the Gas (Downstream Reconciliation) Rules 2008 consultation paper. I am responding on behalf of Energy Direct NZ (EDNZ).

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@energydirect.co.nz or by phone on 06 349 0129.

Yours sincerely

A handwritten signature in black ink that reads "Tgannon".

Tara Gannon
Energy Trading Manager

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EXEMPTION APPLICATIONS DR-09-S, DR09-10-T AND DR-09-11-S

Submission from: **Energy Direct NZ**

Contact: Tara Gannon

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>We agree that the existing exemptions allowing Vector to submit injection data at 12pm on the fourth business day, and only submit injection data for meters without telemetry on business days should be extended until 30 September 2010.</p>
<p><i>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?</i></p>	<p>We currently trade on the Flockhouse gas gate.</p> <p>Ideally we would prefer for the Flockhouse meter to be downgraded or recalibrated so that accurate injection quantities can be obtained.</p> <p>However, if the costs of replacing the meter (which have not been provided) are very high in relation to the number of customers and volume of consumption at the gate, or there is reason to believe that consumption levels at the gate could increase dramatically in the future, granting the exemption would be appropriate.</p> <p>We have had some concerns about high levels of Unaccounted for Gas at the Flockhouse gas gate for some months. We hope that replacement of the meter or if this is not feasible, granting the exemption will dramatically reduce this.</p>
<p><i>Q3 Do submitters have any comments on the exemption application DR09-11-S from Vector regarding the 9 nominated unmetered gas gates?</i></p>	<p>We currently trade on the Wellsford gas gate, and agree that based on the information provided it is appropriate for this exemption to continue until 30 September 2010.</p>