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:

Company name: Mighty River Power Contact Name: Mark Wilderspin

Position: Compliance and Process Improvement Manager

Phone (09) 580 3777 Fax: (09) 580 3515

Mailing Address: Private Bag 92008, Auckland 1142

Email: mark.wilderspin@mercury.co.nz

Question	Comment
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)?	 MRP Support the exception but would encourage the following conditions to be included: TSOs progressively move towards providing injection data on every day for gates with Telemetry and provide estimate of daily injection for days they cannot provided telemetry data TSOs to make all reasonable endeavours to be in a position to comply with rule 42 in respect to all gas gates with telemetry on non business day by 30 September 2010. Where the gas gate has a material volume gas gates with telemetry should be supplying daily information. Where gas gate has material volume, telemetry equipment should be installed. TSOs provide estimated daily injection for gas gates without telemetry.

Question	Comment
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?	MRP supports the exception as the likely cost of changing the meters would out way any benefit gained. However, if the volume through gas gate becomes material, or is likely to become material in foreseeable future as result of development, an appropriate sized meter should be installed.
Q3: Do submitters have any comments on the exemption application DR09-11-S from Vector regarding the 9 nominated unmetered gas gates?	MRP do not support the exception for unmetered gates where there is material volume. We recommend that gates with an annual consumption greater than 1TJ should be metered.