



GREYMOUTH GAS

13 March 2015

Gas Industry Company Limited
PO Box 10 646
Wellington 6143

Dear Sir/Madam,

RE: Gas Quality Requirements and Procedures

Greymouth Gas New Zealand Limited ("Greymouth Gas") is pleased to make a submission on the Gas Quality Requirements and Procedures paper (the "paper") following an invitation from the Gas Industry Company Limited ("GIC") in February 2015.

The previously consulted on gas quality protocol (which parties might have debated and signed-up to) has been turned into an information paper by the GIC. This is great as an industry base-line document to give effect to and/or to understand the Gas (Safety and Measurement) Regulations 2010.

However, what's missing now is a mandate for discussion and change. To this regard:

- Anything without a legislative or factual grounding should be removed from the paper¹.
- The GIC supports industry-led solutions and established the Gas Transmission Investment Programme ("GTIP"). The Gas Industry Transmission Access Working Group ("GITAWG") is giving effect to the GTIP.
- GITAWG is achieving outcomes in quantity, quality and speed that are unprecedented.
- Mandate for gas quality discussion and change² should therefore be led by GITAWG to facilitate debate, analyse options and implement solutions.
- As this is the path the GIC wants, GIC should ensure the continued funding of GITAWG and let industry influence industry (including GIC) priorities and funding.

[Redacted]
Chris Dixon
Commercial Manager

¹ Otherwise, at a high-level, the paper seems accurate.

² E.g. principles and the provision of aggregate gas composition or quality data at various points after which there are no more production stations – i.e. anything with a counterfactual under the regulations.