



6 December 2017

Ben Gerritsen
GM Commercial and Regulation
First Gas Limited
By email

Dear Ben,

RE: GTAC Action Item A – Interrelationship between ICAs and the GTAC

This proposal is good. However, we still think the contract model is sub-optimal vs the MPOC to which Welded Parties are a direct party.

High-level

- It is unclear whether First Gas is consulting on things like section 7.13(c)(ii) in this proposal as the memorandum does not say that action point 31 is being addressed yet the clause relating to this action point is included in the proposal. Being an RPO should be about having systems, processes and procedures in place to prevent then deal with gas quality excursion events, not about whether or not gas is in-spec.
- To have liability provisions consistent with those in section 16, then instead of section 7.3(r), section 16 should be amended to give ICAs contractual nexus in that section.

Detail

- Refer to comments on section 7.13(h) made in the consultation on Agreed Hourly Profiles.

Conclusion

Targeted consultation and workshops on ICAs should be required to ensure proper consideration of the issues here. We have only had time to review the proposal in isolation.

Yours sincerely

Chris Boxall
Commercial Manager