



27 June 2008

Bas Walker
Gas Industry Company
Level 9, State Insurance Tower
1 Willis Street
Wellington

E-mail: submission@gasindustry.co.nz

Dear Bas

RE: Determinations and other matters proposed by Gas Industry Company under the Gas (Downstream Reconciliation) Rules 2008

Genesis Power Limited, trading as Genesis Energy, welcomes the opportunity to submit on the Gas Industry Company's consultation paper 'Proposed determination and other matters under the Gas (Downstream Reconciliation) Rules 2008; Proposed information file formats' dated June 2008.

Genesis Energy is fully supportive of establishing standardised file formats for the industry and believes that the benefits will far outweigh the costs of the initial implementation of these.

Genesis Energy believes that a principles document and supporting guidance notes need to be developed and published before the 1 October 2008 to facilitate the successful implementation of standardised file formats.

Genesis Energy's responses to the consultation questions are attached as an appendix.

If you would like to discuss any of these matters further, please contact me on 09 580 4865.

Yours sincerely

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Global Reconciliation Project Manager
Genesis Energy

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Appendix A Recommended Format for Submissions

To assist the 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 proposed Determinations in their responses.

Consultation on the proposed File Formats (submissions due Friday, 27 June 2008)

Submission prepared by: Sarah McHardy, Genesis Energy, ph 09 5804865

Question	Comment
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Question	Comment
<i>Q1: Do submitters have any general comments on the proposed File Formats, including any comments on the general issues considered by the IEFWWG and Gas Industry Co in the development of the proposed File Formats? Are there any additional File Formats that submitters consider are required?</i>	We agree with the suggested change of file type to csv. The File naming protocol needs to ensure that it encompasses what is all ready being used in the GIEPs including making the title of the file the same as the file type in the header record i.e. GIEP21 has a file type in the header record of GRS-21. This should be GIEP21. Single month data – through our experience with the Electricity Industry we need to be able to indicate on the file whether it is a partial file or a full month replacement file. In the rules it does not limit you to only providing an initial, interim or final file once. There may be a case where we submit an initial file and before the deadline of 8am on wd 4 we realise that the initial file had a material flaw in it and we want to resubmit our initial file. This would mean that we may want to resubmit a partial or a full file again for the initial file and the allocation agent would need to know which way to handle the file. Genesis Energy would like the opportunity to submit either file type with the type identified in the file name. Change control process and other supporting documents - we agree that the change control process can be established at a later stage but believe that the guidance notes and an overarching principles document discussing the general approach to file formats should be developed as soon as possible when the file formats are approved. There is a working group that currently exists that have developed these protocols and we need the knowledge of this team to develop the guidance notes and principles document. If this is left the people in this team will be disbanded and that knowledge will be lost. In addition through experience we have noticed different companies interpret things in different ways. To make the formats work successfully we need to have the guidance notes developed before people start using them to ensure we are all interpreting them in a similar way. Requirements to submit – We are in agreement with the paper in that we only want to submit consumption on the gas gates that we trade on. Field descriptions, types and rules – We do not believe that the difference in field length is material but agree that standardisation across systems for field descriptions, types and rules is preferable. Information for Distributors – We do not believe that distributors need to receive all this information. We accept that they should receive GIEP27 for the areas that they are the distributor but not the other reports. We are unclear what the intent of their use by the Distributors will be. Currently we provide them similar information in a different format so there is a duplication of information and therefore costs that are being incurred with this provision. We do not consider there to be any additional file formats to be considered.

Question	Comment
<i>Q2: Do submitters have any comment on GIEP20, including the additional issues considered in the development of GIEP20?</i>	Inclusion of TOU devices with less than 10TJ consumption – This is an important issue for us as we embark on our smart metering rollout. These meters will in effect be time of use meters but initially we will not be reading them on a daily basis. Under this current scenario we are then not meeting the requirements of the rules and the file formats are documented. Even if there is a meter on a site that has the ability to be TOU we still request the ability to decide how we are going to record the metering information and reconcile it to the market with accuracy and through the most cost efficient method. We request that the GIC make this a priority to review this issue in the Reconciliation rules as we are not the only Retailer that this will impact.
<i>Q3: Do submitters have any comments on GIEP21?</i>	No
<i>Q4: Do submitters have any comments on GIEP22?</i>	No
<i>Q5: Do submitters have any comments on GIEP23 or the additional issues considered in the development of GIEP23?</i>	Why does the file contain both counts and the resulting percentages? This seems redundant as the percentage is a direct calculation from the counts.
<i>Q6: Do retailers prefer, from an operational perspective, the provision of meter reading frequency information annually or monthly?</i>	We would prefer to submit this as a monthly report for operational efficiency with the Allocation Agent compiling it for an annual basis. This would then also match the electricity process.
<i>Q7: Do submitters have any comments on GIEP24?</i>	The information provided to produce this report is not enough to ensure that everyone produces the same information. This is a prime example of where there is a need for guidance notes and principles to be issued as soon as these formats have been approved. In addition Rule 52 does not define how to offset the billed information with the submission information correctly so that this report will have any value.
<i>Q8: Do submitters have any comments on GIEP25?</i>	No
<i>Q9: Do submitters have any comments on GIEP26?</i>	No
<i>Q10: Do submitters have any comments on GIEP27?</i>	No
<i>Q11: Do submitters have any comments on GIEP28?</i>	No
<i>Q12: Do submitters have any comments on GIEP29?</i>	No
<i>Q13: Do submitters have any comments of GIEP30?</i>	We do not want this given to Distributors and do not believe that this is needed by them. What benefit is this going to give them other than being a compliance officer and that is not their role. We believe that this needs to be given to the GIC and monitored by them with any resulting action happening under the surveillance and compliance regime.

Question	Comment
Q14: Do submitters have any comments on GIEP31?	We agree with the inclusion of the rolling 12 month UFG% and for this to be distributed to all parties. This is a good indication of where problems are existing in the reconciliation process.