



17 April 2009

Ian Dempster
Gas Industry Co. Limited
Level 8, The Todd Building
WELLINGTON

By email: submissions@gasindustry.co.nz

Dear Ian

First Floor
Genesis Energy Building
Cnr Woodward St & The
Terrace
PO Box 10568
The Terrace
Wellington 6143
New Zealand

Genesis Power Limited
trading as Genesis Energy

Telephone: 04 495 6350

Fax: 04 495 6363

Private Networks

Genesis Power Limited, trading as Genesis Energy, welcomes the opportunity to provide a submission to the Gas Industry Company in response to Geoff Bertram's paper titled "Application of Gas Governance Arrangements to Private Networks", dated February 2009.

Genesis Energy's perspective is that:

- duplication of gas distribution networks is highly unlikely to be efficient or desirable;
- all market participants benefit from market arrangements and, by default, should bear their share of market costs; and
- exemption of bypass networks from gas governance regulations should be treated as a privilege requiring a high standard of justification on a net public benefit basis.

If you would like to discuss these points further, please contact me on 04 495 3348.

Yours sincerely

A handwritten signature in black ink that reads "Ross Parry".

Ross Parry
Regulatory Affairs Analyst
Genesis Energy