

# Appendix A Template for Submissions

To assist Gas Industry Co in the orderly and efficient consideration of submitters' responses, a suggested format for submissions has been prepared an electronic copy of which is available on our website. This is drawn from the questions posed throughout this Statement of Proposal. Submitters are also invited to include any other comments in their responses to this Statement of Proposal.

Name of organisation: M-co Ltd

Contact person: Allocation Agent                      Email address: alla@m-co.co.nz                      Phone: 04 498 0053

QUESTION	COMMENT
<p>Q1: <i>In relation to the proposal to amend rule 45 to ensure that all residual injected gas quantities are allocated when no consumption information has been submitted:</i></p> <ul style="list-style-type: none"> <li>• <i>Do you agree or disagree with the proposal? Please provide reasons.</i></li> <li>• <i>Do you have any comments on the specific drafting proposed?</i></li> <li>• <i>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</i></li> </ul>	<p>M-co is currently developing these amendments based on exemption DR09-08-T which comes into effect on 1 August 2009.</p> <p>M-co does not currently foresee any further required system changes to implement these amendments.</p>
<p>Q2: <i>In regard to the proposal to amend rules 31, 41 and 48 so that injection and consumption information and allocation reports can be provided at 1200 hours rather than 0800 hours:</i></p> <ul style="list-style-type: none"> <li>• <i>Do you agree or disagree with the proposal? Please provide reasons.</i></li> <li>• <i>Do you have any comments on the specific drafting proposed?</i></li> <li>• <i>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</i></li> </ul>	<p>M-co's main concern is to maintain a minimum 24 hour time period between gate closure and publication of allocation results.</p>

QUESTION	COMMENT
<p>Q3: <i>In regard to the proposal to amend rule 25 so that Gas Industry Co is able to give notice of file formats for additional information exchanges required by the Rules:</i></p> <ul style="list-style-type: none"> <li>• <i>Do you agree or disagree with the proposal? Please provide reasons.</i></li> <li>• <i>Do you have any comments on the specific drafting proposed?</i></li> <li>• <i>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</i></li> </ul>	<p>M-co supports this proposed amendment.</p>
<p>Q4: <i>In regard to the proposal to include a new subclause 26.4 which will enable the allocation agent to reasonably request any information required for its role:</i></p> <ul style="list-style-type: none"> <li>• <i>Do you agree or disagree with the proposal? Please provide reasons.</i></li> <li>• <i>Do you have any comments on the specific drafting proposed?</i></li> <li>• <i>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</i></li> </ul>	<p>M-co supports this proposed rule amendment.</p>
<p>Q5: <i>In regard to the proposal to amend rule 39 to extend the deadline for the provision of trading notifications:</i></p> <ul style="list-style-type: none"> <li>• <i>Do you agree or disagree with the proposal? Please provide reasons.</i></li> <li>• <i>Do you have any comments on the specific drafting proposed?</i></li> <li>• <i>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</i></li> </ul>	<p>M-co supports this proposed rule amendment. There are no operational issues for the allocation agent with implementation of the proposed amendment to rule 39.2.3. Since exemption DR09-04-S has been granted, the number of alleged breaches of rule 39.2.3 required to be submitted by the allocation agent against participants has significantly decreased.</p> <p>The proposed clauses 39.1.3 and 39.2.2 (c), to include a retailer's transmission service agreement status within in a trade notification, will further enhance the allocation process that in general already takes place as part of the GAS020 advice.</p>

QUESTION	COMMENT
<p>Q6: <i>In relation to the proposal to amend rules 5, 30, 41, 44, 45, and 48-50 to better reflect the role of TSOs and transmission arrangements in the downstream allocation process:</i></p> <ul style="list-style-type: none"> <li><i>Do you agree or disagree with the proposal? Please provide reasons.</i></li> <li><i>Do you have any comments on the specific drafting proposed?</i></li> <li><i>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</i></li> </ul>	<p>M-co supports the majority of these amendments based on the fact the intention is to formalise what already happens in practice; but also notes:</p> <p>Rule 41: The allocation agent currently re-downloads (Vector) injection data prior to each interim allocation to capture any amendments made to actual daily injection quantities at any allocable gas gate.</p> <p>Rule 30.4: M-co does not think clause 30.4 is necessary as the allocation system ignores the contract ID in any GAS040, GAS050 or GAS060 submission. The allocation system has been built (as per the functional specification) to accept GAS040, GAS050 and GAS060 files whether the contract identifier is included in the submission or not. The contract ID field is <i>“Optional, but always ignored by the allocation system. Derived by the allocation agent from the retailer trader information”</i></p> <p>Correct allocation across a retailer’s various contract ID’s is achieved by the allocation system looking first for an ICP number in the (GAS050) submission to allocate to a matching level 3 contract ID. If no match is found the system will search the level 2 contract ID’s by using the retailer code and gas gate of the submission (GAS040 and GAS060). If this also fails to match, the allocation will default to the retailer’s standard VTC compliant TSA contract ID.</p> <p>Providing GAS020 contract ID’s are advised and set up correctly (as would be mandatory under the proposed amendments under rule 39), the allocation will be correct for a retailers various contract ID’s. If after consultation clause 30.4 is deemed necessary, it would be advisable to implement a system change to make the contract ID ‘required’ field in the accept and validate process. To make this change would require a minimum of two days work, but a formal cost estimate would need to be requested from M-co. M-co considers the proposed clauses 39.1.3 and 39.2(c) as enough to ensure both correct advice and allocation of contract ID information.</p>

QUESTION	COMMENT
<p data-bbox="62 272 947 304"><i>Q7: In relation to the minor drafting changes proposed in section 3.7:</i></p> <ul data-bbox="125 320 1030 496" style="list-style-type: none"><li data-bbox="125 320 1030 384">• <i>Do you agree or disagree with the proposals? Please provide reasons.</i></li><li data-bbox="125 392 1030 424">• <i>Do you have any comments on the specific drafting proposed?</i></li><li data-bbox="125 432 1030 496">• <i>Do you agree or disagree that the proposals meets the requirements of section 43N(3) of the Act?</i></li></ul>	<p data-bbox="1055 264 1827 296">M-co has no objection to any of the proposed rule amendments, but notes:</p> <p data-bbox="1055 320 2141 376">Rule 35.2.3: if a minor system change is required, a formal cost estimate would need to be requested and provided by M-co..</p>

QUESTION	COMMENT
<i>Q8: Are there any other potential rule changes which are minor and insubstantial in nature, that you would like to see?</i>	
<i>Q9: Do you have any comments on the drafting of any other aspects of the proposed rule amendments attached as Appendix A? Where appropriate, please provide a marked-up copy of the rule amendments (note a Word version is available on Gas Industry Co's website for this purpose)</i>	