

Appendix A Recommended Format for Submissions

To assist 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 exemption applications in their responses.

Submission from: M-co Ltd as the allocation agent, alla@m-co.co.nz (company name and contact)

Question	Comment
<p>Q1: <i>Do submitters have any comments on the exemption DR09-06-T proposed by OnGas regarding an alternative apportionment process for ongoing fees?</i></p>	<p>The allocation agent has no comment.</p>
<p>Q2: <i>In light of the issues raised in section 2.2 above, do submitters have any comments on exemption application DR09-07-T regarding the application of the global 1-month UFG methodology at the additional 21 gas gates identified?</i></p>	<p>The allocation agent prefers the global 1-month gas gates to be pre-specified. The allocation agent currently does a manual check on the consumption submissions at gas gates where global 1-month methodology currently applies. If an additional 21 gas gates are added to this list, manual checking of submissions would compress processing timeframes. Ideally, the process of pre-specification of global 1-month gas gates should be automated so that invalid data is not accepted into the allocation system. The allocation agent would, therefore, seek a system enhancement from Gas Industry Company.</p> <p>The allocation agent does not support the alternative approach to apply the methodology once negative GGRP values have been identified as this could compromise the allocation agent’s ability to meet obligations on publication deadlines. The short turn-around between receiving submissions and publishing an allocation makes for an already compressed timeframe and waiting for retailers to re-submit consumption data would be both inefficient and time intensive.</p>
<p>Q3: <i>Do submitters have any comments on the potential revocation of the global 1-month UFG methodology at the following gas gates: EGC30701 Edgecumbe DF, ORD24701 Oroua Downs, KRG24101 Kairanga, and HGW14501 Ngaruawahia?</i></p>	<p>The allocation agent has no comment.</p>

Question	Comment
<p>Q4: Do submitters have any comments on the potential exemption approaches outlined in respect of application DR09-08-T proposed by Gas Industry Co regarding potential arrangements to address negative GGRP values?</p>	<p>The allocation agent does not favour the options that involve the global 1-month UFG methodology ex-post approach (involving a re-run of an allocation if a new gas gate is found to have negative GGRP values). The time constraints involved in the processing of an initial allocation leaves little room for additional requirements.</p> <p>See response to Q2 above.</p>
<p>Q5: Do submitters have objection to the minor amendment proposed to the Gas (Downstream Reconciliation) Rules 2008 (Exemption DR09-03-T: Residual Injection Quantity Allocation) Notice 2009 to clarify that it does not override the requirements of rule 43?</p>	<p>The allocation agent supports this change.</p>