

From: Jim Green [Jim.Green@mca.govt.nz]
Sent: Tuesday, 29 August 2006 9:23 a.m.
To: Kelly Rastovich
Cc: Mehdi Yassaie; Tony Smith; Evelyn Cole; Graham Boxall
Subject: RE: Gas Emergency Arrangements
Dear Kelly

Thank you for the opportunity to comment on this paper. These comments are made from both the energy safety and the consumer perspectives, and relate to two section in the paper:

Clauses 6.14, 6.15: Definition of "transmission system"
Clauses 8.41, 8.42: Non-specification gas

Questions	Comments
<i>Q13: Do you agree that the current definition of "Transmission System" should be amended? If not, please provide reasons. If yes, please provide a draft definition.</i>	See response to Q14.
<i>Q14: Do you agree that the current definition of "NGC Transmission" should be replaced with a more generic definition of "System Operator" (or similar) as proposed? If not, please provide reasons.</i>	<p>Yes. The paper suggests the definition should be neutral as to ownership. We agree, and note the definition in the Gas Act:</p> <p style="padding-left: 40px;"><i>"gas transmission means the supply of line function services by means of high pressure gas pipelines operated at a gauge pressure exceeding 2,000 kilopascals"</i></p> <p>The NGOCP definition does not <u>need</u> to be aligned with that in the Gas Act, but alignment would reduce the risk of incompatibility and confusion.</p>
<i>Q36 Are there any other factors the Emergency Operator should have regard to in making any such direction? If so, please detail those additional factors.</i>	<ul style="list-style-type: none"> ■ <i>Compliance with legislation needs to be considered. Reason: Regulation 3 of the Gas Regulations 1993 requires compliance with NZS 5442. The NGOCP needs to give consideration to the implications of supplying non-compliant gas, and how that situation should be managed. Note however that an impending review of the regulations is expected to include consideration of amending regulation 3 to allow in special circumstances for the supply of gas that does not comply with the NZS 5442. Responses to this issue from various stakeholders may be of value to this process.</i> ■ <i>A measured cost-benefit consideration could be added as another factor (i.e. it is not "safety at any cost").</i> ■ <i>Consideration should also be given to liabilities associated with supplying non-compliant gas (perhaps not a factor for case by case decisions, but rather a higher level generic consideration).</i>

Regards, Jim Green

From: Kelly Rastovich [mailto:Kelly.rastovich@gasindustry.co.nz]
Sent: Friday, 28 July 2006 5:20 p.m.
To: ...

Subject: Gas Emergency Arrangements

Dear Industry Participant,

Please find attached the Gas Industry Co's discussion paper on "Review of Gas Emergency Arrangements".

We are seeking feedback on the specific questions contained in the paper in addition to any other comments you may have. Submissions are due on **Friday the 25th August 2006**.

Please also note that we are proposing to hold a workshop to discuss this paper on the morning of Friday the 18th August 2006, please mark your diaries with this date and further details will be circulated in due course.

Kind regards

Ian Dempster

Kelly Rastovich
Office Administrator / Team Secretary
Gas Industry Company Limited

Level 9, State Insurance Tower
1 Willis Street
PO Box 10-646, Wellington
New Zealand
DDI: +64 4 494 2469
Phone: +64 4 472 1800
Fax: +64 4 472 1801

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From: Mehdi Yassaie [mailto:Mehdi.Yassaie@med.govt.nz]
Sent: Tuesday, 29 August 2006 11:23 a.m.
To: Jim Green; Kelly Rastovich
Cc: Tony Smith; Evelyn Cole; Graham Boxall
Subject: RE: Gas Emergency Arrangements

Some of the important issues that affect us are;

1-A plan for re-commissioning of systems after they were shut down

2-Industries that must not be shut down (e.g. glass industries)

3-Transparency of the plan and involvement of the regulator downstream to ensure all is under control (given more than one gas network operator in any given area affected.

4- Inclusion and appropriate overlaps between nations emergency plan (assuming it arises from Transmission system failure) and the emergency response plan that individual gas network operators uses and synchronisation of these two for various scenarios

5-The response plan, that I saw sometime ago, makes assumption about the point of breakdown is rather far from a major centre and did not provide for response when the breakdown is very close to a city gate. close to a major city.

Regards

Mehdi Yassaie

Principal Technical Advisor

Energy Safety service

Ministry of Consumer Affairs NZ

Telephone: +64-4-474 2851, Fax: +64 4 460 1365

Be Energy safe, visit our website at <http://www.ess.govt.nz>