

26 August 2021

Paul Cruse
Gas Industry Company Ltd
WELLINGTON 6140 (via email to consultations@gasindustry.co.nz)

Dear Paul,

Re: Final Statement of Proposal (SOP) for Production and Storage Facility Outage Information

1. The following is a brief submission on the GIC's Final Statement of Proposal (SOP) on Gas Production and Storage Facility Outage Information dated 20 July 2021. This submission is being made on behalf of the Major Gas Users Group (MGUG). Membership includes:
 - a. Ballance Agri-Nutrients Ltd
 - b. Fonterra Co-operative Group
 - c. New Zealand Steel Ltd
 - d. Oji Fibre Solutions Ltd
 - e. Refining NZ
 - f. New Zealand Sugar
 - g. Goodman Fielder.
2. Members have been consulted and nothing in this submission is confidential.
3. MGUG has reviewed the Final Statement of Proposal. MGUG supports the Gas Industry Company's conclusion (page 57) that the most practicable means for implementing information disclosure arrangements for gas production and storage facility outage information is to implement them within a framework of regulations (and/or rules) under the Gas Act.

Yours sincerely



Richard Hale/Len Houwers
Hale & Twomey Ltd/Arete Consulting Ltd
Secretariat for the Major Gas Users Group