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Dear Ian

SUBMISSION ON SPECIFICATION FOR RETICULATED NATURAL GAS

Introduction

1. Thank you for the opportunity to comment on the Gas Industry Company's (GIC's) consultation paper "*Review of New Zealand Specification for Reticulated Natural Gas*", March 2006.
2. No part of our submission is confidential and we are happy for it to be publicly released.

Mighty River Power's views

3. Mighty River Power agrees with Plant and Platform's view that:
 - a. The specification limits limited in Table 2 of NZS 5442:1999 do not need to be changed at this stage (Q.01);
 - b. There is little value to be obtained by undertaking an in-depth, rigorous review of the specification at this stage (Q.02);
 - c. The matters of detection and prevention of out of specification gas entering the transmission system; prevention of step changes to the Wobbe Index for gas delivered to gas turbine and gas engine operators; and identification of swings in the Wobbe Index and the forewarning of gas turbine and gas engine operators are matters that can be left to the stakeholders concerned to address commercially (Q.03)

Concluding remarks

4. If you would like to discuss this matter directly with Mighty River Power, please do not hesitate to contact either me (on 09 308 8213 or neil.williams@mightyriver.co.nz) or Duncan Jared (on 09 308 8290 or duncan.jared@mightyriver.co.nz).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Neil Williams', with a long horizontal flourish extending to the right.

Neil Williams
General Manager – External Affairs