

# 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.

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QUESTION	COMMENT
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<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>Mighty River Power agree with the proposal to provide a zero-floor for gas gate residual profiles (GGRP), but believes it is a short term solution and a longer term solution should be sought due to:</p> <ol style="list-style-type: none"> <li>1) The instances of negative residual profiles need to be examined to determine the causes.</li> <li>2) GIC need a plan to determine sites that need to be audited for gates that continuously cause negative residual profiles</li> <li>3) It does not reduce all of the additional risk of capacity overrun charges caused by negative profile values. For example, a foreseeable scenario at a gas gate like Kinleith, is for an entire consumption month's GRP to be set to zero apart from two days with positive GRPs. (This GRP profile occurred in May09); If a retailer's Allocation Group 4&amp;6 customers were using 1GJ per day (31GJ per month), then the 31GJ will get allocated into those two days with positive GRPs (given they are equal), becomes 15.5GJ per day. The retailer would reserve capacity for 1GJ per day, but following allocation, the retailer would get penalised for 14.5GJ of overrun. In such cases a retailer will have to pay for overrun charges that are an outcome of the Allocation System rather than the retailers actions on reserving capacity, which were prudent and in line with industry practice. <u>The GIC need to consider a limit on the order of overrun charges incurred by retailers as result of allocation system.</u> In the above example, the overrun caused by system is 14,500%, so the overrun could be limited to 120%.</li> <li>4) Regarding rule 45.2.6: If the entire consumption month's GRP at a particular gas gate is set to zero follow application of the Zero-floor method, then all retailers with volumes for Allocation Groups 4&amp;6 at that gate will get allocated zero volume. That is, retailers will not have to pay for the gas that their Allocation Group 4&amp;6 customers have used at that gate.</li> </ol> <p>Mighty River Power agrees with scaling of total allocated quantities to match injection quantities.</p> <p>Mighty River Power agree the proposal meets the requirements of section 43N(3) of the act.</p>

QUESTION	COMMENT
<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>Mighty River Power agree with the proposal</p> <p>Mighty River Power agree the proposal meets the requirements of section 43N(3) of the act.</p>
<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>Mighty River Power agree with the proposal</p> <p>Mighty River Power agree the proposal meets the requirements of section 43N(3) of the act.</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>Mighty River Power agree with the proposal</p> <p>Mighty River Power agree the proposal meets the requirements of section 43N(3) of the act.</p>

QUESTION	COMMENT
<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>Mighty River Power agree with the proposal</p> <p>Mighty River Power agree the proposal meets the requirements of section 43N(3) of the act.</p>
<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>Mighty River Power agree with the proposal</p> <p>Mighty River Power agree the proposal meets the requirements of section 43N(3) of the act.</p>
<p>Q7: <i>In relation to the minor drafting changes proposed in section 3.7:</i></p> <ul style="list-style-type: none"> <li>• <i>Do you agree or disagree with the proposals? 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 proposals meets the requirements of section 43N(3) of the Act?</i></li> </ul>	<p>Mighty River Power agree with the proposal</p> <p>Mighty River Power agree the proposal meets the requirements of section 43N(3) of the act.</p>
<p>Q8: <i>Are there any other potential rule changes which are minor and insubstantial in nature, that you would like to see?</i></p>	<p>No</p>
<p>Q9: <i>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></p>	<p>No</p>