

Appendix A Recommended Format for Submissions

To assist the 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 proposed Determinations in their responses.

Matters for Consultation by Friday, 11 July 2008

Submission prepared by:

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Question	Comment
<i>Q15: Do submitters agree with the +/- 15% percentage of error that Gas Industry Co proposes to determine under rule 37.3? If not, please explain why and please propose a different percentage of error with supporting information and reasons.</i>	We found the section giving information on this subject a little confusing and disjointed. However, from previous documentation on this matter we agree to a +/-15% percentage of error that the Gas Industry Co proposes to determine.
<i>Q16: Do submitters have any general comments to note on the choice of a percentage of error between +/- 10% and +/- 20%?</i>	15% is a reasonable figure given the information provided.

Question	Comment
<i>Q17: Do submitters have any comments or information in relation to the matters that Gas Industry Co must have regard to when determining an appropriate percentage of error?</i>	<ol style="list-style-type: none"> 1. We support the statement that the primary aim is accuracy. 2. The cost and achievability needs to be balanced by the overall achievement of all retailers.
<i>Q18: Do submitters have any comments on the proposed grouping of gas gates for the purposes of the Reconciliation Rules? Are there any other gas gates that need to be considered as a group for the purposes of the Reconciliation Rules?</i>	Unless we have a consistent approach to this issue by the transmission operators and distribution network operators we see no benefit from zoning for the purposes of reconciliation and believe that the process should continue to be allocated by the actual gate rather than a notional gate.
<i>Q19: Gas Industry Co notes that the application of the Reconciliation Rules is not limited to shared gas gates. Are there any gas gates that should be validly exempt from the rules? If so, why?</i>	No comment
<i>Q20: Transmission owners are asked to provide their views on the discussion regarding the implementation of rules 41 and 42 and respond to the question asked above of them.</i>	No comment
<i>Q21: Do submitters have any views of Gas Industry Co's proposed timing for the provision of estimated day-end volume injection quantities each day (ie 10am and 4pm) or any other comments on the proposed implementation of rules 41 and 42?</i>	No comment
<i>Q22: Do submitters have any comments on the proposed ability for the allocation agent to be able to supply special reports and information to allocation participants? Or comments on Gas Industry Co's proposal to provide for this in the allocation agent service provider agreement?</i>	The Allocation Agent should be given the ability to supply specific reports to allocation participants at their request. Our suggestion is that this via a contractual arrangement with individual parties, with the approval of the GIC.

Question	Comment
<i>Q23: Do submitters have any comments on the provision of allocation information by the allocation agent to OATIS, including any comments on the dummy files attached as Appendix D?</i>	No comment.
<i>Q24: Do submitters have any comments on the proposed process by which the allocation agent should be advised by retails of changes to Vector's supplementary contract codes?</i>	No comment.
<i>Q25: Do submitters have any comments on the proposed notification form and process?</i>	Yes a form is required. We support the GIC developing a standard form but suggest the allocation agent be given the ability to change the design of the form based on the information as it is required rather than having a restricted format that will result in lack of availability of information when required.
<i>Q26: Do submitters have any comments on the definition of "gas measurement system" in the context of the definition of "gas gate"?</i>	No comment
<p><i>Q27: To assist Gas Industry Co's analysis, Gas Industry Co request industry participants provide information relevant to the following:</i></p> <ul style="list-style-type: none"> <i>• An estimate of the number of third party gas measurement system connections;</i> <i>• An estimate of the number (if any) of instances where a third party owns the meter, but not the whole gas measurement system; and</i> <i>• Any other information from participants where they have previously considered the issues of gas measurement systems or meter ownership in the context of the Gas Act definition of "distribution system".</i> 	Mighty River Power consider that the majority of our gas measurement system connections are third party. Our estimate of the total number of third party gas measurement systems is 150,000.
<i>Q28: Do submitters have any comments on any of the other implementation matters detailed in Part 4 of the paper?</i>	No

Question	Comment
Q29: Do submitters have any comments on the migration from current industry arrangements to the allocation arrangements provided under the Reconciliation Rules?	We have not further comments at this stage.