



4 May 2011

Mr I Wilson
Senior Adviser - Pipelines
Gas Industry Company Limited
PO Box 10 646
Wellington 6143

Mighty River Power Limited
Level 14, ANZ Centre
23-29 Albert Street
Auckland 1010
PO Box 90399
Auckland 1142

Phone: +64 9 308 8200
Fax: +64 9 308 8209
www.mightyriverpower.co.nz

DDI: +64 6 348 7926

Dear Ian

MPOC Change Request 18 April 2011

Introduction

1. Mighty River Power welcomes the opportunity to comment on the Change Request for the Maui Pipeline Operating Code (MPOC) dated 18 April 2011 submitted by Maui Development Limited. No part of the submission is confidential and Mighty River Power is happy for it to be publicly released.

Comments

2. We note that the Change Request deletes reference to the National Gas Outage Contingency Plan which is appropriate given the plan is no longer current. We would however have expected that these references would be replaced with one to the Gas Governance (Critical Contingency Management) Regulations 2008.
3. Mighty River Power has no objections to any of the remaining proposed changes to the MPOC detailed in this Change Request.
4. We do not believe that the non replacement of the National Gas Outage Contingency Plan with the Gas Governance (Critical Contingency Management) Regulations 2008 is sufficient reason to reject this Change Request. Mighty River Power therefore supports the 18 April 2011 Change Request.

Concluding remarks

5. If you would like to discuss any of our above comments directly with Mighty River Power, then please do not hesitate to me on 06 348 7926 or jim.raybould@mightyriver.co.nz .

Yours sincerely

A handwritten signature in black ink that reads "Jim Raybould". The signature is written in a cursive style with a horizontal line above the first name.

Jim Raybould

Retail Gas Operations Manager