



20 June 2011

Mr S Bielby
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Dear Steve

MPOC Change Request 18 April 2011

Introduction

1. Mighty River Power welcomes the opportunity to comment on the Gas Industry Company's Draft Recommendation on the Change Request for the Maui Pipeline Operating Code (MPOC) dated 18 April 2011. No part of this submission is confidential and Mighty River Power is happy for it to be publicly released.

Comments

2. Mighty River Power supports the Gas Industry Company's Draft Recommendation to approve the above MPOC Change Request.
3. We do however agree with Contact Energy with regards to the proposed changes to sections 20.3(b) and 20.4(b) of the MPOC. In particular we do not believe that a shipper with a credit rating subject to a negative credit watch is necessarily a higher risk to Maui Developments Limited (MDL) that a shipper who's credit rating is not subject to a credit watch.
4. Whilst Mighty River Power supports the Gas Industry Company's draft recommendation we would ask that in light of Contact Energy's submission together with the Gas Industry Company's comments on the proposed changes to sections 20.3(b) and 20.4(b) of the MPOC that MDL reconsiders these changes.

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, slightly slanted style.

Jim Raybould
Gas Manager