



17 September 2013

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Dear Marianna

## **Consultation on Rule 37 Determination under the Gas (Downstream Reconciliation) Rules**

### **Introduction**

1. Mighty River Power welcomes the opportunity to respond to the Gas Industry Company's consultation on the accuracy threshold for Rule 37 of the Gas (Downstream Reconciliation) Rules 2008 issued on 9 September 2013. No part of the 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 recommendation that the current threshold of  $\pm 10\%$  is retained for the forthcoming gas contract year.
3. We are however concerned that for those retailers operating at gas gates where they have a relatively few number of customers it is too easy for them to be in breach of this rule, albeit a non-material breach.
4. We would therefore recommend that the threshold be amended to include a GJ threshold as well as a percentage threshold. With this in mind we would suggest that the GJ threshold could be 20 GJ, 10% of the materiality threshold.

### **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](mailto: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 few letters of "Jim".

**Jim Raybould**  
Gas Manager