

Appendix A Recommended Format for Submissions

To assist 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 exemption applications in their responses.

Submission from

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| Question | Comment |
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| <i>Q1: Do submitters have any comments on the exemption DR09-06-T proposed by OnGas regarding an alternative apportionment process for ongoing fees?</i> | <p>Mighty River Power do not support the proposed exemption relating to alternative ongoing fees allocation. We have done our own calculations which show that whilst On Gas would significantly benefit from the suggested methodology, other participants would wear a substantially increased portion of the fees that do not reflect the true cause of the fee.</p> <p>Mighty River Power also considers that there are other methods for the calculation of apportionment of fees which could be applied and suggest that if the GIC are seriously considering this exemption they need to look at all possibilities otherwise retain the status quo.</p> |
| <i>Q2: In light of the issues raised in section 2.2 above, do submitters have any comments on exemption application DR09-07-T regarding the application of the global 1-month UFG methodology at the additional 21 gas gates identified?</i> | <p>Mighty River Power has no issues with the application of global 1-month UFG methodology to certain gates.</p> |

| Question | Comment |
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| <i>Q3: Do submitters have any comments on the potential revocation of the global 1-month UFG methodology at the following gas gates: EGC30701 Edgecumbe DF, ORD24701 Oroua Downs, KRG24101 Kairanga, and HGW14501 Ngaruawahia?</i> | No comments |

| Question | Comment |
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| <p>Q4: <i>Do submitters have any comments on the potential exemption approaches outlined in respect of application DR09-08-T proposed by Gas Industry Co regarding potential arrangements to address negative GGRP values?</i></p> | <p>Mighty River Power does not agree with the exemption proposal to address negative GGRP.</p> <ol style="list-style-type: none">1) The instances of negative residual profiles need to be examined to determine the causes before amendments are considered2) The effect of moving gates to Global 1 needs to be implemented and the investigations as mentioned above be completed, then it can be considered whether further intervention is necessary.3) Notwithstanding the above, the solution provided (zero floor) can result in an infinite value for seasonal adjustment value for a period (Divide by zero), and therefore is mathematically flawed. |

| Question | Comment |
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| <i>Q5: Do submitters have objection to the minor amendment proposed to the Gas (Downstream Reconciliation) Rules 2008 (Exemption DR09-03-T: Residual Injection Quantity Allocation) Notice 2009 to clarify that it does not override the requirements of rule 43?</i> | We have no objection to the minor amendment. |