



Energy Direct NZ Ltd
179 St. Hill St
PO Box 32
Wanganui 4540

20/7

Tel: 06 349 0909

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Fax: 06 345 4931

Freephone: 0800 567 777

Email: enquiries@energydirectnz.co.nz

Web: www.energydirectnz.co.nz

Gas Industry Company
PO Box 10-646
Wellington

Dear Sir or Madam

**CONSULTATION ON EXEMPTION APPLICATIONS UNDER THE GAS
(DOWNSTREAM RECONCILIATION) RULES 2008**

Thank you for the opportunity to comment on the exemption applications under the Gas (Downstream Reconciliation) Rules 2008. I am responding on behalf of Energy Direct NZ Ltd (EDNZ).

We are happy for all of these exemptions to be extended.

If you would like to discuss our comments further please contact me by email at tara.gannon@energydirectnz.co.nz or by phone on DDI 06 349 2055. Alternatively you can contact our General Manager, Michael Ram, by email at michael.ram@energydirectnz.co.nz or by phone on 06 349 0129

Yours sincerely

A handwritten signature in black ink that reads "Tgannon".

Tara Gannon
Energy Trading Manager

Enc

Submission from: Tara Gannon, Energy Direct NZ Limited

Question	Comment
<i>Q1:</i> Do submitters have any comments on the proposed variation to the global 1-month UFG methodology exemptions?	EDNZ does not trade on any gas gates that apply the global 1-month UFG methodology. We agree that the exemption should be extended from 30 September 2010 to 30 September 2012.
<i>Q2:</i> Do submitters have any comments on the proposed variation to the direct connect gas gates exemptions?	We agree that the exemption should be extended from 30 September 2010 to 30 September 2012.
<i>Q3:</i> Do submitters have any comments on the proposed variation to the injection information exemption?	We are happy for the exemption relating to daily injection information to continue.
<i>Q4:</i> Do submitters have any comments on the proposed variation to the oversized metered gas gates exemption?	We currently trade at the Flockhouse gas gate which is affected by this exemption. We agree that the exemption should be extended.
<i>Q5:</i> Do submitters have any comments on the proposed variation to the unmetered gas gates exemption?	While EDNZ is not directly affected by this exemption as we do not have any customers on the affected gates, we agree that the proposed terms and conditions are reasonable.