



16 September 2014

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Dear Tim

## **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 15 September 2014. No part of the submission is confidential and Mighty River Power is happy for it to be publicly released. As previously submitted we would like to reiterate the following comments:

### 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 09 580 3875 or [phillip.brandt@mightyriver.co.nz](mailto:phillip.brandt@mightyriver.co.nz).

Yours sincerely

Phillip Brandt

Compliance and Process Improvement Coordinator