

Consultation on the proposed File Formats (submissions due Friday, 27 June 2008)

Submission prepared by: Charles Teichert on behalf of Nova Gas

Question	Comment
Q1: <i>Do submitters have any general comments on the proposed File Formats, including any comments on the general issues considered by the IeffWG and Gas Industry Co in the development of the proposed File Formats? Are there any additional File Formats that submitters consider are required?</i>	<p>Nova supports confirmation of csv file formats as the most appropriate.</p> <p>An issue to consider in relation to washups in particular is what happens when parties do not resubmit gate data in relation to a historical month. Does this mean that previous submissions still remain valid? There has been several incidents in the electricity industry where parties have resubmitted data for a site or group of sites under a new code or gate and have not “zeroed” prior submissions. This has resulted in double counting of ICP consumption.</p> <p>An alternative approach is that parties must submit data for all gates each washup even if there is no change to the previously submitted data.</p> <p>Nova does not have a strong preference either way and would like to hear the views of other retailers.</p> <p>On the issue of provision of data for distributors and Vector Transmission, Nova believes that if they receive a benefit from that data (and clearly they do otherwise they would not have requested it) then there should be a contribution from those parties to the costs of the allocation process.</p> <p>Nova does not accept arguments that retailers are indifferent as such costs would simply be included in distribution and transmission costs if they were charged to distribution companies and Vector. The Commerce Commission has responsibility for overseeing monopoly distribution companies and for that process to be effective, costs associated with such developments as the registry and reconciliation developments should be allocated to them to the extent that they benefit from those arrangements.</p>
Q2: <i>Do submitters have any comment on GIEP20, including the additional issues considered in the development of GIEP20?</i>	No
Q3: <i>Do submitters have any comments on GIEP21?</i>	No
Q4: <i>Do submitters have any comments on GIEP22?</i>	No
Q5: <i>Do submitters have any comments on GIEP23 or the additional issues considered in the development on GIEP23?</i>	No

Question	Comment
<i>Q6: Do retailers prefer, from an operational perspective, the provision of meter reading frequency information annually or monthly?</i>	Nova prefers the inclusion of meter reading frequency data on a monthly basis. This provides a better opportunity for issues to be identified and addressed at an early stage. Additional costs associated with submitting such data on a monthly basis should be insignificant and immaterial.
<i>Q7: Do submitters have any comments on GIEP24?</i>	No
<i>Q8: Do submitters have any comments on GIEP25?</i>	No
<i>Q9: Do submitters have any comments on GIEP26?</i>	No
<i>Q10: Do submitters have any comments on GIEP27?</i>	No
<i>Q11: Do submitters have any comments on GIEP28?</i>	No
<i>Q12: Do submitters have any comments on GIEP29?</i>	Working examples of these files need to be made available to industry participants as soon as possible as this is the key area that is going to create significant development work for retailers. Development of processes for taking into account seasonality profiles needs to begin as soon as possible to be confident in being able to meet the requirements of the rules for the first washup in mid February. We note that such development work will clash with registry and switching developments due to go live 1 March 2009.
<i>Q13: Do submitters have any comments of GIEP30?</i>	No
<i>Q14: Do submitters have any comments on GIEP31?</i>	No