Consultation on Gas Industry Co. FY2019 Work Programme and Levy

Submission prepared by: Nova Energy Limited, Paul Baker

QUESTION		COMMENT
Q1:	Do you have any comments on the process for developing Gas Industry Co's Work Programme and Levy?	For future reference, Nova suggests the GIC could put forward its long list of potential projects to the Co-Regulatory Forum for feedback and discussion; including those projects that may be deferred for a year or more. The GIC could seek feedback and discussion on that longer list, rather than just its proposed projects for the coming year. It seems that by asking the Board to review the Indicative Work Programme and Budget in October, and holding the Forum in November, the Forum is effectively presented with a programme that has already been refined, albeit not locked-in. Market participants are not generally focussed on how the industry can further develop its operations and processes, and therefore do not necessarily have views on what needs to be changed without some prompting. In that sense, the GIC is not fully capturing potentially valuable insights from industry participants at the Forum. Taking a wider perspective would be more consistent with the preparation of the GIC's SOI which covers a three-year planning period. In reference to this year's plan, Nova acknowledges that flexibility has been limited by the need to address the development of the gas transmission code, and the priority given to information disclosure.
Q2:	Do you consider there to be any other items that should be included in the Company's intended Work Programme for FY2020? If so, please describe the work required and how that work achieves the outcomes sought under the Gas Act and GPS.	No

QUESTION		COMMENT
Q3:	Do you consider there to be any items that should be excluded from the Company's intended Work Programme for FY2020? Please provide reasons for your response.	No
Q4:	We are particularly interested in industry comment on the forecast gas volumes - do stakeholders consider the projection reasonable? If not, what would they consider an appropriate gas volume estimate to be?	Nova believes that the GIC's estimate of gas volumes for FY2020 is reasonable.
Q5:	Do you have any comment on the proposed levy rates under the New Code and Status Quo scenarios for FY2020?	Nova is okay with the proposed levy.