



Gas Industry Co
Level 8, Todd Building
95 Customhouse Quay
Wellington 6143
Via web upload

19 December 2012

Dear Gas Industry Company

Re: Proposed recommendation on the Gas (Processing Facilities Information Disclosure) Rules 2008

Thank you for the opportunity to comment on this proposed recommendation.

Contact Energy Limited (Contact) **agrees** that regulated access to processing facilities is **not** required at this stage. However, Contact does **not agree** that information disclosures should be **allowed to lapse** from 2014. Our reasons for this are set out below.

Contact agrees that regulated access to processing facilities is not required

As the consultation paper notes, there is no evidence to suggest that the current market for gas services is not operating efficiently; hence it would be inconsistent to recommend regulation. In our view it is preferable for parties seeking access to gas processing facilities to reach an agreement on commercial terms acceptable to both parties.

Contact supports information disclosure remaining in place

While the paper notes there is no evidence to suggest that information disclosures have provided a benefit to the industry¹, as a party who has used the disclosure of processing capacities and infrastructure for forecasting purposes over the last 12 months we would like to see this information continue to remain available. While we have not accessed this information frequently (as we note above, it has been used for forecasting purposes), this is not an indication of the worth of the information. Additionally *Energy News* uses the information (at least in the first instance) for its website fact files, a back door route whereby some parties may seek the disclosure information.

We would also note that for the majority of parties interviewed, providing the information disclosures is not seen as an onerous requirement.

Yours sincerely

Louise Griffin
Competitive Intelligence and Regulatory Affairs Advisor

¹ Please note that Contact was **not** interviewed by Concept to obtain Contact's views on this issue.