

4 March 2021

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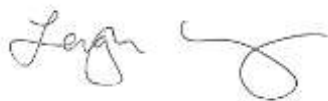
Draft Statement of Proposal: Gas Production and Storage Facility Outage Information

We appreciate the opportunity to respond to the draft Statement of Proposal for the disclosure of gas production and storage facility outage information.

Thermal fuel supply information plays an important role in Transpower's ability, as the electricity system operator, to ensure sufficient generation plant is available to meet all forecast electricity needs. As discussed in our submission to you in April 2019 on Information Disclosure in the Gas market, we consider better forecast information about resource adequacy (or more relevantly, inadequacy) will enhance our ability to maintain system security reduce the likelihood of resorting to interventions that pose significant economic cost and consequences for New Zealand.

Efficient and effective information disclosures from wholesale gas market participants will greatly contribute to New Zealand's overall energy security. We therefore believe regulation is warranted to ensure the consistency and enforceability of disclosure requirements, and to achieve the best outcome for our energy system as a whole. We remain available to provide any assistance you may need.

Regards,



Leigh Westley
SO Market and Business Manager