

7 April 2010



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Ian Dempster
Principal Adviser - Markets
Gas Industry Company
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Dear Ian

**SUBMISSION ON RULINGS PANEL
SUMMARY OF PROCEDURES**

1. Vector Limited ("Vector") welcomes the opportunity to submit on the Gas Industry Company's proposal to add the following paragraph to the Rulings Panel Summary of Procedures:

Consideration of an alleged breach

7. Once the Rulings Panel has decided to determine an alleged breach under Regulation 36(c) or the Investigator refers an alleged breach to the Rulings Panel under Regulation 37, the procedures listed below apply in determining the alleged breach. If exceptional circumstances arise in relation to an alleged breach that suggest a hearing should not go ahead or be deferred, such circumstances must be brought to the attention of the Rulings Panel, with full details of the circumstances. The Rulings Panel may then, at its sole discretion as permitted by legislation, amend its processes in respect of that alleged breach.
2. Vector does not have any issues with the above proposal.
3. Vector, however, would like to raise a relevant issue in relation to paragraph 11(a) of the Summary of Procedures. Under this paragraph, there is the possibility of the Parties not getting the Investigator's report until the 4th business day after it is received by the Rulings Panel, which is the last day before the Initial Directions Conference. This is the final day a Party is required to file its memorandum with the Rulings Panel (paragraph 13). We appreciate that, in practice, the Investigator will usually provide the report to the Parties at the same time (or shortly after) it is provided to the Rulings Panel. However, for certainty, we consider that there should be an obligation (as opposed to "reasonable endeavours") on the Investigator to provide the report to other Parties at the same time as providing it to the Rulings Panel.

4. Alternatively, the time-period between the provision of the report to the Rulings Panel and the Initial Directions Conference could be lengthened to give a Party more time to file a memorandum once the report is received. Despite our proposal, we also appreciate that it is the Investigator's usual practice to provide a draft report to the Parties prior to finalising it for the Rulings Panel.
5. If you have any queries, or require further information, please feel free to contact me at John.Rampton@vector.co.nz or 04 803 9036.

Kind regards

A handwritten signature in black ink, appearing to read 'John Rampton'.

John Rampton
Manager Industry Governance and Policy