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Ian Wilson  
The Gas Industry Company  
[www.gasindustry.co.nz](http://www.gasindustry.co.nz)

Dear Ian

### **Maui Pipeline Operating Code – Amendment Process**

1. Vector Limited ("Vector") welcomes the opportunity to make a submission on the proposed change to the Maui Pipeline Operating Code ("MPOC") Change Request Procedure, proposed by Mighty River Power Limited on 24 April 2015 (the "Change").
2. This submission is not confidential and we are happy for it to be made publicly available.
3. Vector's contact person for this submission is:  
Anna Casey  
Commercial Adviser  
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(09) 978 8138.
4. Vector supports the proposed Change. It mirrors the change made recently to the Vector Transmission Code ("VTC"), introducing a new change request process enabling real consultation and collaboration with other code signatories to the VTC, as well as allowing any interested party to make submissions on proposed changes.
5. Introducing the same change request procedure into the MPOC is consistent with the Panel of Expert Advisors' recommendation for evolutionary convergence between the MPOC and the VTC. It will also enable a streamlined process between the VTC and the MPOC for the adoption of any changes to transmission access arising out of the GIC's proposed process set out in its Options for Improvement Paper #2, issued in May this year.
6. We believe the proposed Change is a significant improvement on the current MPOC change request procedure, which provides for consultation only when no refinements or drafting changes can be made to a proposed change – the change must either be adopted in its entirety or rejected. A process allowing amendments to the proposed change once it has been submitted allows for real engagement in a consultation process.
7. We note MDL raised concerns about the VTC change request process in their Submission on "Transmission Access; Options for Improvement Paper #2", dated 22 June 2015. Our understanding of the concerns MDL raise is that: the VTC process provides the GIC with rights only equal to other parties in the change process with no regulatory powers of oversight (in that process), and that the commercial interests of those other parties are likely to constrain the outcomes of potential change requests.
8. Vector disagrees with the above assessment of the VTC change request process. Fundamentally the GIC is not limited by the VTC change request process and is fully

able to consider and implement regulatory measures where such measures are required and appropriate.

9. The VTC change request process, provides a transparent mechanism whereby industry and stakeholders have an opportunity to develop solutions to industry issues. Through this process the GIC is able to input and make it known where they stand on the proposal. This can occur well in advance of the consideration of any regulatory counterfactual. Consequently we believe the VTC change request process assists stakeholders in considering and evolving their respective commercial positions in light of such information.
10. For these reasons, Vector considers the GIC should support the proposed Change.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Brett Butler', with a stylized, cursive script.

Brett Butler  
Group Manager Pricing & Valuation