



20/7

13 July 2006

Mr P Mitchell
Gas Industry Company
P O Box 10-464
WELLINGTON

Dear Paul

**OPTIONS FOR AMENDING ALLOCATION AND RECONCILIATION
ARRANGEMENTS IN THE NEW ZEALAND GAS INDUSTRY**

Thank you for the opportunity to comment on the "Options for amending Allocation and Reconciliation Arrangements in the New Zealand Gas Industry". I am responding on behalf of the Commercial Division of Wanganui Gas (WGL).

I have enclosed a completed copy of 'Appendix A Format for Submissions' but would like to take this opportunity to make one further comment on the consultation paper.

From previous GART papers I am aware that the issue of the threshold for customers with time of use metering was discussed. These discussions centred on the possible lowering of the threshold from 10 TJ to 5 TJ. Given the need for quality information to minimise mismatches with Maui Open Access I believe that this option should, if it has not already been done, be developed to the point to allow us to determine how many additional customers and how much annual load would fall within the new threshold. It would then be possible to determine if there would be a cost benefit in the installation of time of use metering for customers with an annual consumption of 5 TJ - 10 TJ.

Again thank you for this opportunity to comment on these matters. I would be happy to discuss any of the above comments or issues with you and can be contacted by e-mail at jim.raybould@wanganuigas.co.nz or by phone on 06 349 0126.

Yours sincerely

Jim Raybould
COMMERCIAL MANAGER

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