## Consultation on Gas Industry Co. FY2019 Work Programme and Levy

## Submission prepared by: Nova Energy Limited, Paul Baker

QUESTION		COMMENT
Q1:	Do you have any comments on Gas Industry Co's role or Strategy relevant to development of the Work Programme and Levy?	No
Q2:	Do you have any comments on the process for developing Gas Industry Co's Work Programme and Levy?	Nova believes the current settings have been shown to work and should continue.
Q3:	Do you consider there to be any other items that should be included in the Company's intended Work Programme for FY2019? If so, please describe the work required and how that work achieves the outcomes sought under the Gas Act and GPS?	We note that under the Strategic Objective: 'Develop and communicate the role of gas in meeting NZ's energy needs' there is no specific reference to promoting the awareness of gas reserves in helping meet New Zealand's climate change objectives, particularly in reference to the target of 100% renewable electricity generation under average hydro conditions by 2035. The Gas Industry Company could consider starting to consider the implications of that target for the industry.
Q4:	Do you consider there to be any items that should be excluded from the Company's intended Work Programme for FY2019? Please provide reasons for your response?	No
Q5:	We are particularly interested in industry comment on the forecast gas volumes - do stakeholders consider the projection reasonable? If not, what would they consider an appropriate gas volume estimate to be?	Nova believes that the GIC's estimate of gas volumes for FY2019 is reasonable.

QUESTION		COMMENT
Q6:	Do you have any comment on the proposed levy for FY2019?	Nova is comfortable with the proposed levy.
Q7.	Do you have any comments on the proposed amendments?	Nova supports accurate reporting of gas volumes and believes that the proposed changes may be workable. Nova would like to see the detail of the changes, together with having an opportunity to prepare a pro-forma return based on the proposed new regulations before it is finalised.