Ian Dempster
Gas Industry Company Ltd
95 Customhouse Quay
Wellington



Ben Gerritsen First Gas Limited 42 Connett Road West New Plymouth

Delivered via email

31 January 2017

Dear Ian and Ben

GTAC SCOP2¹ – submission clarification and minor correction

emsTradepoint made a submission during the recent GTAC consultation. After reviewing the submission analysis, we would like to provide clarification for, and a minor correction to, one of the answers we provided to a consultation question. The question (and answer) we would like to clarify and correct is shown below.

Q27: Are there particular code change processes or features that you consider important or valuable for the new code?

The Code change processes should mirror those in the Electricity Industry Act that apply to changes of the Electricity Industry Participation Code, with First Gas in the position of the Electricity Authority (i.e. the person who actually approves Code changes). All changes should need to be consulted on and supported by a cost benefit analysis, except changes that are minor or are required urgently. Urgent changes should be reconfirmed by way of the full process in due course

We support First Gas exploring a 'tiered approach' to change requests

Our intention behind this answer was to recommend a code change process that we believe to be working well (the current change process for the EIPC²). Our intention was *not* to recommend who should have the authority to approve code changes.

We recognise that the current wording of our answer suggests it is our view First Gas should be have sole authority to approve code changes, as such we would like to provide a corrected version below.

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¹ Gas Transmission Access Code – Single Code Options Paper 2

² Electricity Industry Participation Code



Q27: Are there particular code change processes or features that you consider important or valuable for the new code?

The Code change processes should mirror those in the Electricity Industry Act that apply to changes of the Electricity Industry Participation Code (with approval authority for changes residing with the GIC, as per the current MPOC change process). All changes should need to be consulted on and supported by a cost benefit analysis, except changes that are minor or are required urgently. Urgent changes should be reconfirmed by way of the full process in due course

We support First Gas exploring a 'tiered approach' to change requests

If you would like to discuss any of these matters further, please contact me on (04) 590 7293.

Yours sincerely

Bennet Tucker
Gas Market Manager

emsTradepoint