

Ian Wilson
Gas Industry Company Ltd
95 Customhouse Quay
WELLINGTON



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18 October 2016

Dear Ian

emsTradepoint welcomes the opportunity to provide a submission to the Gas Industry Company (GIC) on its paper entitled '*Wholesale Levy Assurance Options Paper*' (consultation paper).

In general, emsTradepoint supports the information and conclusions found in the GIC's consultation paper. Our only request is that the system for collection of the wholesale levy takes into account emsTradepoint's market rules¹ when determining the administrative burden (or any other cost) of each of the options.

An appendix containing emsTradepoint's responses to the GIC's submission questions is attached.

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

Yours sincerely

A handwritten signature in blue ink, appearing to be "Bennet Tucker", written over a light blue circular stamp.

Bennet Tucker
Gas Market Manager
emsTradepoint

¹ Specifically rules 15.4, 16.14 and 16.17 of [emsTradepoint's Market Rules](#)

Appendix A – Submission template

<p>Q1</p>	<p>Do you agree that the current arrangements do not provide adequate assurance that wholesale levy payers are meeting their respective obligations and that changes need to be made to provide adequate assurance that wholesale levy returns and payments are accurate?</p>
	<p><i>Yes, based on the information GIC have provided in the consultation paper.</i></p>
<p>Q2</p>	<p>Do you consider that there are any other efficient, low-cost options to address the shortcomings of the current methodology in the Levy Regulations? If so, please provide the alternative(s) together with your assessment compared with the four options presented.</p>
	<p><i>We have not considered any other options.</i></p>
<p>Q3</p>	<p>Do you agree with the analysis of each of the four options? If not, please provide your reasons.</p>
	<p><i>Yes we agree with the analysis of the options.</i></p> <p><i>However, emsTradepoint's Market Rules contain a number of rules (including, but not limited to, rules 15.4, 16.14 and 16.17) that apply to, or are affected by, Industry Body Levies (which includes the Wholesale Levy). It is important that any analysis that considers the costs of possible options also takes into account the effect on the relevant emsTradepoint Market Rules and therefore the effect on emsTradepoint and our Participants.</i></p>
<p>Q4</p>	<p>Do you agree with the analysis that option 3 addresses the problem at low cost and provides an appropriate set of checks and balances?</p>
	<p><i>Yes we agree, subject to the same caveat in Question 3.</i></p>
<p>Q5</p>	<p>Do you agree that it would be desirable to amend regulations 18 and 20 of the CCM Regulations to align with any changed levy regulations?</p>
	<p><i>Yes.</i></p>
<p>Q6</p>	<p>Do you agree that such an amendment to regulations 18 and 20 would be minor and technical, i.e. its effect is minor and it does not adversely affect the interests of any person in a substantial way?</p>
	<p><i>Yes.</i></p>