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29 August 2014

Steve Bielby
Gas Industry Company
Level 8, The Todd Building
95 Customhouse Quay
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By email: submissions@ea.govt.nz

Dear Steve

Submission on gas quality information protocol

Genesis Energy Limited welcomes the opportunity to submit on the Gas Industry Company Limited's ("the GIC") draft gas quality information protocol dated August 2014.

Genesis Energy supports the gas quality protocol, and is welcomes the outcomes of the Gas Retailer Working Group. However, we have one additional recommendation on the frequency of gas component monitoring.

We consider there is benefit for a more specified monitoring frequency for some gas components. From the draft protocol's Appendix A, a number of components' state a specified frequency of monitoring as "when requested". We consider suggest this is too vague. We understand gas quality varies across different parts of gas transmission at different time period, However, we suggest that more specified monitoring will benefit the entire gas network and end consumers. Our responses to the specific questions are outlined in Appendix A.

If you would like to discuss any of these matters further, please contact me on 04 495 6357.

Yours sincerely



Daisy Shen
Regulatory Advisor

Appendix A: Responses to Consultation Questions

QUESTION	COMMENT
<p>Q1: The purpose of the Protocol is described in Section 1.1. The section also notes that Gas Industry Co has agreed to maintain the Protocol and periodically re-issue it in accordance with the governance arrangements set out in Appendix B. Do you consider that it is appropriate for Gas Industry Co to take responsibility for the governance of the Protocol?</p> <p>If so, are the Appendix B arrangements adequate?</p>	<p>Yes.</p>
<p>Q2: Do you agree with the principles of good industry practice in respect of gas quality as set out in Section 1.2?</p>	<p>Yes.</p>
<p>Q3: Is there anything in Chapter 2 overview of gas quality arrangements that you would wish to change?</p>	<p>No.</p>
<p>Q4: Is there anything in Chapter 3 description of the legal framework for gas quality that you would wish to change?</p>	<p>No.</p>
<p>Q5: Is there anything in Chapter 4 description of the technical standards for gas quality that you would wish to change?</p>	<p>No.</p>
<p>Q6: Is there anything in Chapter 5 description of the gas quality obligations and means of compliance that you would wish to change?</p>	<p>No.</p>

QUESTION	COMMENT
Q7: Is there anything in Chapter 6 description of gas quality exceptions and incidents that you would wish to change?	No.
Q8: Is there anything in Chapter 7 description of gas information that you would wish to change?	No.