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Ian Wilson  
Gas Industry Company Limited  
PO Box 10 646  
Wellington 6143

28 January 2009

Dear Ian,

### **VTC Change Request Appeal (Daily Metering Data)-Submission**

1. This submission is made on behalf of OnGas Limited and Vector Gas Contracts Limited ("OnGas"). OnGas welcomes the opportunity to submit its views to the Gas Industry Company ("GIC") on the Vector Transmission Code ("VTC") Change Request Daily Metering Data Appeal ("the Appeal").
2. OnGas expresses its support for the provision of daily metering data, however does not support Contact Limited's ("Contact") change request.
3. OnGas submits that the request for daily metering data should be revised taking into consideration the number of other work streams suggesting the need for robust daily information. These include:
  - Daily allocation options (under Transmission Balancing);
  - The exemptions in place for Gas (Downstream Reconciliation) Rules 2008- rules 41 and 42; and
  - The subject of this appeal, Contact's change request for daily metering information.
4. OnGas recognises the possibility of the industry incurring unnecessary costs if these work streams are pursued independently. Therefore, OnGas believes efficiencies exist in the GIC establishing a dedicated work stream simultaneously addressing the above bullet points.
5. The three areas of work all suggest new developments for metering data and a move towards a daily balancing regime. A single stream addressing

daily metering and allocation options, in OnGas's view, would be best placed under Transmission Balancing.

6. Therefore, OnGas would prefer that the GIC reject Contact's change request and instead pursue a daily metering and allocation regime allowing all options to be assessed holistically, under a single work stream in consultation with industry participants.
7. Thank you for considering this submission. If you have any queries, or require further information, please feel free to contact me at [a.carrick@vector.co.nz](mailto:a.carrick@vector.co.nz) or 04 462 8620.

Kind regards

A handwritten signature in blue ink, consisting of a large, stylized 'A' followed by a cursive name, all enclosed within a blue oval.

**Anna Carrick**

Gas Portfolio Manager