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Ms Pamela Caird and Ian Dempster  
Gas Industry Company  
PO Box 10-646  
Wellington

Dear Pamela and Ian

### **PROPOSED GUIDELINE FOR APPLICATION OF GAS BILLING FACTORS**

Thank you for the opportunity to comment on the proposed guideline for application of gas billing factors. I am responding on behalf of Energy Direct NZ Limited (EDNZ).

Please find our feedback on the proposed guideline in the attached table.

If you would like to discuss our comments further please contact me by email at [tara.gannon@energydirectnz.co.nz](mailto:tara.gannon@energydirectnz.co.nz) or by phone on DDI 06 349 2055. Alternatively you can contact our General Manager, Michael Ram, by email at [michael.ram@energydirectnz.co.nz](mailto:michael.ram@energydirectnz.co.nz) or by phone on 06 349 0129.

Yours sincerely

A handwritten signature in black ink that reads "Tannon".

Tara Gannon  
**Energy Trading Manager**

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Question	Comment
<p>1 Please provide feedback on the above draft guideline note.</p>	<p>We agree that retailers should regularly check meter details against the meter owner's records. During our performance audit Tom Tetenburg recommended we match our records to the meter owners' monthly, rather than the minimum six monthly checks recommended in the guideline. Contact Energy, NGC/AMS, Powerco and GasNet all provide us with monthly meter data files. We match these files to our billing system and investigate and correct any discrepancies. We agree that it would be useful to have meter information available on the Gas Registry so that the details are available at any time. Careful consideration should be given to the cost of making this information available on the Registry versus the benefit, especially as meter owners are currently willing to provide this information on request.</p> <p>We agree with the recommendations that daily temperature data should be applied and refreshed regularly. The Joule-Thomson effect should be applied, based on the network pressure on the Gas Registry and the meter pressure verified by the meter owner.</p> <p>We have contacted all network owners regarding the altitudes they have populated on the Gas Registry. All of the network operators have assured us that the altitudes are accurate and that they are reviewed and updated as required. We note that Powerco is currently reviewing and updating altitudes on the Gas Registry to the nearest 1 m.</p>
<p>2 Do you support the addition to the gas registry of further meter set up parameters such as meter pressure, meter multiplier and number of dials, as meter owner maintained fields.</p>	<p>Yes, it would be useful to have all details for a supply on the Gas Registry. This would allow us to check all details for a supply simultaneously, instead of carrying out separate checks to meter owner records.</p> <p>Meter owners currently provide meter set up details to EDNZ monthly, and at other times on request.</p>
<p>3 Do you agree that a common ground temperature dataset should be established for use in energy conversions by retailers?</p>	<p>It is likely to be more time efficient if one party calculates average daily temperatures for each gas gate and then makes the data available to other parties.</p> <p>However, a single dataset would have some disadvantages:</p> <ul style="list-style-type: none"> <li>• As different retailers may store temperature data at different levels, e.g. monthly versus daily, or for a region versus single gas gates, they may have different data requirements. EDNZ would require daily temperature by gas gate.</li> <li>• In some cases the nearest NIWA Climate Station to a gas gate may not have 30mm temperature data available, and there may be considerable distance to the next Climate Station with 30mm data.</li> </ul>

	<p>Retailers may have differing opinions on which data should be used in these cases, i.e. 10mm, 20mm or 50mm data for the nearer Climate Station, or 30mm data from a more distant Climate Station.</p> <ul style="list-style-type: none"><li>• Temperature data is available free of charge from NIWA and EDNZ requires temperature data for a relatively small subset of the total number of gates. Depending on how/whether the costs of creating the dataset are recovered, it may not be a cost effective option.</li><li>• Retailers would not have the freedom to review and adjust temperatures when they wish to. If temperature varies dramatically from previous years, retailers can review and modify their data at any time.</li><li>• A rule change may be required if use of the ground temperature dataset is mandatory.</li></ul>
<p>4 Do you have any suggestions for how the database should be configured?</p>	<p>We believe it would be best to store daily temperatures by gas gate.</p> <p>Rather than query a database for which access has to be managed, we would prefer retailers were issued with a simple text file containing gas gate, date and temperature value. A similar format to the current GAR060 report would be acceptable, with temperatures replacing the SADSVS. The report would need to include a forecast of temperatures for future dates.</p>