

Andrew Walker

From: Aaron Wall <Aaron.Wall@contactenergy.co.nz>
Sent: Friday, 31 July 2026 2:10 pm
To: Andrew Walker
Cc: Nathan Joyce; Campbell Wilson; Narinder Kumar
Subject: Contact Energy feedback: Workshop: Gas Governance Rule Changes

Hi Andrew

Please find attached feedback from Contact Energy's Operations and Energy Rec teams for the current GIC Consultation.

Could we please organise a follow-up meeting between Contact and the yourselves team at the GIC to discuss our feedback in regards these changes to ensure there is a clear understanding of our current position and challenges Contact would face if these changes were not implemented in a realistic timeframe (potentially at least 9-12 months) and likewise provide opportunity for yourselves to ask us additional questions about our feedback provided.

Registry AMI Flag and Allocation Group changes

- Full E2E system testing required to ensure SAP Switching and Registry correctly manage the new fields.

D+1 allocation methodology

- Business day D+1 to 7-day D+1 data submitted to Allocation Agent
 - Contact Energy support this proposed change and the benefits that this will provide to all participants.
- D+1 allocation runs and allocation results
 - Contact Energy wish to maintain the existing allocation run and results cycle and retain the 11.15am as un-validated data and 2.15pm as validated data as this allows a consistent approach to be applied in all downstream systems and processes which utilise this data.
- Daily submissions for daily-reconciled consumers (Allocation Groups 1, 3, 5)
 - Contact Energy, while recognising the benefits of the proposed D+1/Allocation groups changes, require significant SAP system and process changes to be able to successfully submit the D+1 data for AG3 and AG5 ICP data to the Allocation Agent, in addition to updated commercial agreements required for the provision of Gas Smart meter data from Bluecurrent for the new D+1 requirements.
 - Bluecurrent currently submit D+1 for CTCT's AG1 ICP's out of their Gas C&I TOU Data system and they use a different data collection platform to collect Smart Meter data which does not have the functionality to perform this function, which would then require Retailers to complete this out of their own systems. Bluecurrent have confirmed that they would require significant investment/resources to their systems and process to enable them to provide D+1 services for AG3 and AG5 ICP's for Retailers, placing big uncertainty on their ability to perform this function.
 - If Contact is required to develop an SAP system solution, Contact's Data Collection process for Gas Smart Meter data has limitations in regards current functionality and timeframes to process the data through all steps in the process to produce D+1 data.
 - Raw Gas Daily data is sent from Bluecurrent and ingested into a Data Warehouse and exported into an SAP table but is not currently used for any purpose. This data is currently not actively managed by the business and Contact would require significant change in our IMDM and SAP systems to allow validated actual AG3 and AG5 ICP data to be available for D+1 as per AG1 ICP data.

- The current Gas Smart data supplied to CTCT by Bluecurrent does not have any of the required Conversion Factors applied, so these need to be applied within our SAP system, before the D+1 data could be successfully submitted, if Bluecurrent could not upgrade their systems to perform this function for Contact.

Changes to allocation groups & UFG allocation

- Contact Energy's SAP system architects have confirmed that they would require 6 to 9 months' time to successfully develop/deploy the required changes to the system:
 - Enhance existing GAS050 submission file to include AG3 ICP data in addition to AG1 and AG2 ICP's.
 - Create new GAS060 submission file required for AG5 ICP's.

We look forward to the opportunity to catchup and discuss this with you soon.

Regards
Aaron

Aaron Wall
Portfolio Analyst
Portfolio Operations
Retail Revenue



From: Aaron Wall
Sent: Friday, 26 June 2026 03:52 pm
To:
Subject: FW: Workshop: Gas Governance Rule Changes

Hi Team (Energy & Network Rec)

Please find attached the information pack from the workshop I attended on Wednesday and while a lot of the discussion was focussed more from a Traders of Gas perspective, there is a definite impact from an Operations and Energy/Network Rec perspective which we will definitely need to respond to the consultation on.

Key Summary from Energy Rec perspective

- GIC wanting to start utilising Gas Smart Meter data (proposed now considered TOU) now available in the market to improve overall data quality.
- Two new Allocation Groups **AG3** and **AG5** activated for ICP's metered by Gas Smart Meters.
 - Retailers who submit **AG3** and **AG5** data will see greater benefit in the market by being allocated less UFG (un-accounted for Gas) each month.
- **Daily D+1** data submitted to Allocation Agent (performed by Bluecurrent for Contact), which was just **AG1**, proposed to include **AG3** and **AG5** ICP's.
 - Significant challenges/roadblocks for Contact, and/or Bluecurrent exist here based on existing systems/processes.
- Allocation Agent Submission files (attached the AA functional spec for everyone's reference).
 - **No Change:** Existing CTCT Submission File: GAS040 – **AG4 & AG6**.
 - **Review of Existing Functionality required:** Existing CTCT Submission File: GAS050 – Will include any **AG3** ICP level data in addition to **AG1** and **AG2**.

- **New Submission file required to be created in SAP:** GAS060 Receive daily submissions for dynamic deemed profiles – **AG5**
- Registry changes required to include a MEP\Communicating Flag.
- Note Renewable Gas Injection was more of a brainstorm in regards how to manage this and this is more of a Sharon/Tobias topic to work through – no commentary required other than to say even all the industry experts in the room did not know the answer yet.

Please feel free to contact me sooner if you have any questions.

Summary of modified allocation groups

Consumer size	Allocation group	Profile	Reconciliation type	D+1 reconciliation	UFG
>20TJ pa	1	XTOU	Daily metered	Daily subs, ICP-level	AUFG
>10TJ pa	1	XTOU	Daily metered	Daily subs, ICP-level	AUFG
	2	XTOU	Daily metered	Modelled, ICP-level	AUFG
>250GJ pa	3	AGMI	Daily metered	Daily subs, ICP-level	AUFG
		STOU	Daily (static) profiled	Modelled, ICP-level	AUFG
	4	GGRP	Monthly profiled	Modelled, gas gate-aggregated	MUFG
<250GJ pa	5	AGMI	Daily metered	Daily subs, gas gate-aggregated	AUFG
		STOU	Daily (dynamic) profiled	Modelled, gas gate-aggregated	AUFG
	6	GGRP	Monthly profiled	Modelled, gas gate-aggregated	MUFG

Cheers
Aaron

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From: Andrew Walker <Andrew.Walker@gasindustry.co.nz>
Sent: Friday, 26 June 2026 11:21 am
To: Andrew Walker <Andrew.Walker@gasindustry.co.nz>
Subject: Workshop: Gas Governance Rule Changes

Hi All

Thank you for attending the workshop on Tuesday, it was a really valuable discussion on the various topics covered by the rule changes. As requested, please find attached the slides from the day.

The deadline for submissions on the consultation is **Friday 31 July 2026**. If anyone would like further meetings on the rule changes during the consultation period, please get in touch.

Kind Regards
Andrew

Andrew Walker Principal Adviser

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