

Andrew Walker

From: Brenden Kristensen <Brenden.Kristensen@transpower.co.nz>
Sent: Friday, 31 July 2026 3:52 pm
To: Andrew Walker
Cc: Maggie Keshaboina; Nick Warren; Mark Newlands; Willie Leung
Subject: EMS Feedback on Gas Governance Rule Changes

Hi Andrew

Please find below EMS' thoughts and feedback on the draft Gas (Downstream Reconciliation) Rules 2008 distributed on 16 June.

If you have any feedback or questions, we're always happy to discuss further.

Cheers

BRENDEN KRISTENSEN

Senior Project Manager

Transpower New Zealand Ltd

Waikoukou, 22 Boulcott Street, PO Box 1021, Wellington

M: +64 21 112 6714

transpower.co.nz

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Section 27H - Determination of criteria for invalid D+1 allocation

- Suggest the inclusion of 'and publish' i.e. "...determine *and publish* the criteria..."
- As a side note, the criteria will need to be specified in such a way that they aren't open to subjectiveness and can be evaluated by different individuals or organisations. This should also facilitate automating them.

Static Deemed Profiles

- Our first recommendation would be to remove static deemed profiles for both AG3 and AG5. The rationale for this is:
 - They haven't been used historically
 - AGMI meters are now an option when usage differs from the gas gate residual profile
 - It simplifies the use of the AG3 and AG5 groups
- Assuming that Static Deemed Profiles stay, as you've indicated, D+1 would treat any Profile ICPs as a TOU ICP, with a couple of implications:
 - the retailer could submit a file (AG3) or include it in their aggregated file (AG5) every day
 - D+1 would otherwise treat it as any other ICP with a missing daily file.
- If D+1 needs to treat Static Deemed Profiles separately then we need to explore the implications for D+1 further

39A Retailer to give distribution injection point trading notice to allocation agent

- Suggest that there is a minimum lead-time (e.g. 3 business days) to provide time to administer and cross-check the new Injection Point without compromising SLAs

44 Correction of other allocations by allocation agent

- The wording is a bit cumbersome. Suggest wording it as 'Correction of initial, interim and final allocations by allocation agent'

- This removes the need to explicitly exclude D+1 allocations in the next line

Schedule 2 - Allocation in zero consumption situations

- The intro refers to 45.2.7(c) and (d), where (d) doesn't exist. (either that or the last paragraph in 45.7.2 needs a (d), but it doesn't read as it should)

And lastly, was there a reason that D+1 was spread through the whole document rather than inserted as its own section?