

Genesis's response

Question Number	Question	Genesis response
1.	Do you agree with GIC's assessment of the strategic context?	Yes, in particular the GIC's assessment of the importance of 'investment confidence' to the future direction of the gas sector in New Zealand. GIC has a role working with other relevant government bodies, notably MBIE, to provide industry with policy and regulatory clarity and certainty.
2.	Do submitters have any comments on the process for developing GIC's FY2025 Work Programme and Levy?	
3.	Do you consider there to be any other items that should be included in GIC's intended Work Programme for FY2025? If so, please describe the work required and how that work achieves the outcomes sought under the Gas Act and GPS.	<p>We are supportive of measures to address any market barriers to the development of renewable gas, including tradeable renewable gas certificate or other market measures, and development of new regulatory arrangements relating to CCUS. We expect it will be critical to ensure any such arrangements for gas are part of cross-government, economy-wide policy or regulatory measures addressing CCUS, including changes to ETS settings. For example, it may make sense to align GIC's work to MfE's Carbon Removals Strategy.</p> <p>In addition to the items cited, we recommend the GIC investigate the extent to which the gas transmission system is and will remain fit for purpose in an increasingly renewable environment and therefore with a much more intermittent and peaky gas load. We believe there would be significant benefit in GIC analysis into this issue. One conclusion from this assessment may be that more investment in compression is required.</p> <p>We would welcome the GIC's involvement in measures to ensure gas is available, including for electricity generation. As we noted in our submission on MBIE's <i>Gas Transition Plan Issues Paper</i>, we do not see importation of LNG as a viable option. However, we would welcome the GIC's involvement in work to enhance the capacity and flexibility of gas storage, including work to support additional physical gas storage (as noted above), for example by commissioning a study into feasible fields that could provide a suitable gas storage facility.</p>

4.	Do you consider there to be any items that should be excluded from the GIC's intended Work Programme for FY2025? Please provide reasons for your response.	
5.	GIC is particularly interested in industry comment on the forecast gas volumes – do stakeholders consider the 150 PJ projection reasonable? If not, what would they consider an appropriate gas volume estimate to be? NOTE – any submissions provided in response to this question will be treated as confidential and will not be published.	Confidential.
6.	Do you have any comment on the proposed levy rates for FY 2025?	