



24 February 2026

Robert Gibson
Senior Adviser
Gas Industry Company Limited

Dear Robert,

Re: Gas Information Exchange Protocols

Greymouth refers to GIC's email of 5 December 2025 requesting feedback on voluntary gas information exchange protocols 1, 2, 4, 5B, 8, 12, 13, 13B, and 13C.

Greymouth considers GIEP 13, 13B and 13C are problematic and should not progress. If GIC wants to progress, Greymouth requests an industry workshop to discuss.

GIEP 13, 13B, and 13 C not fit for purpose

Administrative Burden for No Benefit

If these voluntary guidelines were to be followed, scarce skilled resource would be swamped in administrative tasks rather than serving gas to the market. Having to respond within 2 or 5 business days on consumption information requests would make this a high priority (when it is a low priority).

There is no gas registry field for retailer and the policy solution (which does not have a policy problem) incorrectly assumes that the retailer in the gas registry will always be the retailer of the consumer.

Further, the GIEPs are not limited to domestic advanced smart meters per the consultation document. Even if they were, that would cause confusion as definitions for advanced smart meters have yet to be added to the relevant legislation.

Having a carve out from GIEP13B if information is provided on a website portal overlooks the fact that this information would already be provided in invoices (which should be within the carve-out), defeating the need for the protocol. This proposal will burden gas retailers with work producing information in a particular format that the consumer holds.

Significant Principal-Agent Issues

These GIEPs gloss over fundamental principal-agent issues. A consumer may seek to appoint an agent, perhaps via a letter of authority, but the arrangements may not be acceptable to retailers without safeguards. Unless agency arrangements are explicitly addressed in supply contracts, letters of authority will not bind agents to the third-party confidentiality obligations of

the principal nor ensure that the principal takes full liability for its agent's actions. What is required is a tripartite agency agreement between the principal, agent, and retailer. Absent that, the retailer, who has the final say in the GIEPs, may not recognise the agent for legitimate confidentiality and liability management reasons.

Secondly, a non-disclosure agreement may be required between the retailer and the agent. Otherwise, retailers may not have the means to ensure that only the agent (or principal) receives and uses the information.

Finally, it is a most unusual policy solution for a competing retailer to be the agent of a consumer. Fundamental principal-agent issues are best dealt with by the market, not in voluntary protocols.

Other GIEPs

- GIEP1, 2, & 12 – the gas industry uses GJs for shipping and balancing not kWh – distributors should tailor gas tariffs to GJs.
- GIEP4 – there is no value-add (rather, duplication is the outcome) – the information should be in the gas registry. This GIEP should be dropped.
- GIEP5B – this is not fit for purpose – retailers should not receive a complicated file if there is an unplanned network outage. Retailers should receive something akin to urgent Oatis notices.

Conclusion

Just because the electricity industry does something does not mean the gas industry should copy it. Aligning some things may make sense – but the bar for doing so should be high, benefits should outweigh costs, and nuances in the gas industry must be recognised.

GIC is encouraged to consider whether the *work it does* can be a barrier to entry in markets. Like the upstream outage protocol, there is a risk that something voluntary could become compulsory particularly given the Consumer and Product Data Act 2025 for example vis-à-vis GIEP13. Open-banking and open-electricity make sense in growth markets – but 'open-gas' makes no sense in a degrowth market where potential new entrants may be put off by the existence of unnecessary measures imposing extra administration.

Yours sincerely

Chris Boxall

Chris Boxall
Commercial Manager

Cc – David Prentice, CEO, GIC