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Gas Industry Co
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Tēnā koe,

Feedback on draft Gas Information Exchange Protocols

We appreciate the opportunity to respond to the Gas Industry Co (**GIC**) on the draft updated and new Gas Information Exchange Protocols (**GIEPs**) prior to their finalisation.

We acknowledge, and support, the decision that all GIEPs will be voluntary. We have provided comments in the attached table. Our suggestions are to ensure workability and streamlining in implementation. In addition, we have highlighted some areas where adjustment is needed to be consistent with the electricity information exchange protocols, or conversely, where adjustment is needed as consistency is not appropriate.

Our feedback does not contain any confidential information. We would welcome the opportunity to discuss or clarify our suggestions. If you have any questions or would like to talk further on the points we have raised, please contact Michael Grace (Michael.Grace@powerco.co.nz).

Nāku noa, nā,



Emma Wilson
Head of Policy, Regulation and Markets
POWERCO

Comments on the draft GIEPs

Component	Powerco comments
GIEP1	
File transport mechanism	Registry Hub should be mentioned as the preferred transport mechanism to supply a GIEP file. Manual (email) should only be used as a last resort due to the inherent security issues. We note that there are more onerous restrictions on the GIEP4 files, even though consumption data is also considered sensitive.
Tilde character ("~")	This character should not be used as a field separator. In some systems this is a special character, and another character should be used (such as pipe " " or dash "-").
'As billed' vs 'Normalised'	'AA normalised' should be highlighted as the preferred option, and the focus should shift away from 'As-Billed'. This could potentially be done by stating a preference in the pricing policy.
Rate unit of measure	Should add 'Day' into the valid list of fields for the daily charges. Currently states 'Must be one of: GJ, MJ, kWh'.
GIEP1 spec sheet	<p>It would be good to update the GIEP1 spec sheet, bottom of page 4 to clarify that AA normalised files should not contain negatives. Our suggested additional wording is highlighted in red underline:</p> <p>Estimate status</p> <p>This indicates that at least part of the consumption has been estimated (typically consumption reported as ES is based on an estimated meter read).</p> <p>Where a high (low) estimate read results in high (low) consumption being reported it is expected that this will self-correct going forward when an actual read is processed, resulting in a compensating negative/low (high) consumption for that period.</p> <p><u>Allocation Agent (AA) normalised reporting cannot contain negative consumption.</u></p>
GIEP8	
Price category	<p>It would be good to have the current (old) price category as well as the new.</p> <p>We would prefer use of term 'proposed price category' rather than 'price category' as this implies that it will change.</p> <p>We suggest changing from 'Price category change date' to 'Effective Date' to be consistent with electricity terminology.</p>
Annual Consumption	A standard measure for the unit of measure (GJ, or kWh) is required as per the GIEP1. Would be useful to have a UOM field in the file if not a defined/standard measure.
Rejecting or declining requests	We recommend this file is 'two ways '(i.e. notify the retailer or rejection as per electricity) in which case we need a rejection reason field added (or alternatively the 'reason for change' field could be co-opted.

GIEP12	<p>Powerco has a number of individually ICP priced sites over most allocation groups (we classify these as "non-standard individually priced sites"). These often share the same price category code. As they are individually priced at an ICP level they cannot be uploaded in the GIEP12 format required.</p> <p>We suggest adding to the "Description of when this protocol applies":</p> <p><u>3. A distributor may, but is not required to, use this protocol where consumer ICPs are individually priced.</u></p>
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