

Changes to Gas Governance Arrangements

23 February 2023

Submission prepared by: Nova Energy Limited – Paul Baker

Question	Comment
Q1 Do you support the proposals in Section 4 (Capturing and maintaining registry information)? Please provide comments and feedback, including whether there are additional changes that Gas Industry Co should consider	
<ul style="list-style-type: none">• Add two new meter owner fields to the registry (i) Meter Type and (ii) AGMI Communicating (Y/N)	Agreed. <ul style="list-style-type: none">• In addition, the MEP should be required to enter on to the Registry all of the information required for recording the energy used at ICPs, i.e. there should be no need for the retailer to ask the MEP for additional information. Currently Meter model is not available on the registry. This should be included at the same time as these additional fields.• Nova also proposes that the relevant ANZSIC Code should be recorded at each ICP. With the gas transition it will be valuable to determine which industries are transitioning away from gas over time, and which activities are maintaining gas usage.
<ul style="list-style-type: none">• Amend Rules 58.1 and 61.1 to improve clarity and consistency of ICP update timeframes.	Agreed <ul style="list-style-type: none">• Any proposed timeframes must be consistent across all participants involved in the process e.g. Where MEOs have 10 days to update the registry, Retailers should have 15 to allow for the paperwork to arrive from the MEO.
<ul style="list-style-type: none">• Introduce a two-tier framework for assessing compliance with update timeframes.	Agreed
<ul style="list-style-type: none">• Introduce a new definition for distribution injection points.	Agreed
<ul style="list-style-type: none">• Introduce an obligation on distributors to give notice of a new injection point.	Agreed

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<ul style="list-style-type: none"> Distributor must populate details of the network injection point (specific parameters to be determined). 	Agreed
Q2. Do you support the proposals in Section 5 (Allocation groups, interrogation and submission requirements)? Please provide comments and feedback, including whether there are additional changes that Gas Industry Co should consider	
<ul style="list-style-type: none"> Amend allocation group rules and definitions to provide for daily-reconciled ICPs 	Agree in principle <ul style="list-style-type: none"> In line with 1.1, rather than extending allocation groups, a retailer field for “Submission Type” added to the Registry to flag whether the ICP is subject to daily or annual/monthly submission allow for more flexibility. Most businesses separately manage allocation groups and submission types. Combining these will unnecessarily create complexity within a business. Nova suggests 1 new allocation group for AMI metering instead of 2 (3 & 5). Adding ANZSIC would be the appropriate alternative to split customers arbitrarily by usage levels using allocation groups (when the allocation group 3 & 5 split would not result in any difference in meter reads or submissions in practice.)
<ul style="list-style-type: none"> Publish guidance or criteria for assigning daily-reconciled ICPs to allocation groups 	Agreed as above.
<ul style="list-style-type: none"> Require all consumer installations that have (or are expected to have) annual consumption greater than or equal to 20TJ, to have a TOU meter with Telemetry installed and be assigned to allocation group 1. 	Agreed
<ul style="list-style-type: none"> Retailers must provide daily metered energy volumes to the allocation agent each day for all ICPs in allocation groups 1, 3, and 5. 	Agreed
<ul style="list-style-type: none"> Determine an appropriate file format for retailers to submit daily AGMI data to the allocation agent. 	Agreed

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<ul style="list-style-type: none"> Validated injection and daily-reconciled consumption data must be provided seven days per week. 	Agreed
Q3. Do you support the proposals in Section 6 (Energy conversion)? Please provide comments and feedback, including whether there are additional changes that Gas Industry Co should consider	
<ul style="list-style-type: none"> Broaden the obligation to demonstrate compliance with NZS 5259:2015 to capture (a) all allocation participants and (b) all aspects of the standard. 	<p>Do not agree.</p> <p>Any items specified within NZS5259:2015 that GIC believe have an impact should be extracted from the standard and proposed as rules. Applying a broad-brush requirement to comply with the standard potentially exposes participants to costs and risks that are not easily defined.</p>
<ul style="list-style-type: none"> Introduce requirement to use Gas Industry Co published temperature data for temperature correction or otherwise be able to demonstrate compliance with NZS 529:2015 	If accepted, the data should be populated to the ICP or Gas Gate record on the registry. Applies to the remaining proposals in Q3.
<ul style="list-style-type: none"> Require Gas Industry Co to refresh temperature data at intervals not exceeding ten years. 	Agreed
<ul style="list-style-type: none"> The transmission system owner must publish validated gas composition data seven days per week. 	Agreed
<ul style="list-style-type: none"> Develop appropriate roles and procedures to ensure retailers have all the information required to measure energy consumption for their customers on networks with distribution injection points. 	Agreed
Q4. Do you support the proposals in Section 7 (Allocation stages)? Please provide comments and feedback, including whether there are additional changes that Gas Industry Co should consider	

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<ul style="list-style-type: none"> Incorporate the D+1 allocation into the Reconciliation Rules , allowing for changes to the timing of the morning and afternoon publication deadlines. 	Agreed
<ul style="list-style-type: none"> Do not implement any changes to the timing of the initial or interim allocations at this stage. 	Agreed
Q5. Do you support the proposals in Section 8 (Allocation methodology and UFG)? Please provide comments and feedback, including whether there are additional changes that Gas Industry Co should consider	
<ul style="list-style-type: none"> Maintain the current approach for UFG allocation (a combination of AUFG, MUFG and G1M UFG) as the prevalence of AGMI and telemetry increases but continue to monitor UFG levels and causes. 	Agreed
<ul style="list-style-type: none"> Modify the standard and G1M allocation methodologies to provide for AGMI data in allocation groups 3 and 5 and for distribution injection points 	Agreed
<ul style="list-style-type: none"> Incorporate the D+1 allocation methodology into the Reconciliation Rules. 	Agreed. This should be made effective from 1 October 2024.
Q6. Do you support the proposals in Section 9 (Maintaining contract & customer information)? Please provide comments and feedback, including whether there are additional changes that Gas Industry Co should consider	
<ul style="list-style-type: none"> Require volumes transacted for distribution injection points to be assigned to a contract ID. 	Agreed
<ul style="list-style-type: none"> Require retailers to notify the allocation agent of customer, contract and consumption information that is pertinent to D+1 allocations 	This requirement should specify the instances where a retailer must provide customer and contract information. “Pertinent” needs to be defined.
Q7. Do you support the proposals in Section 10 (Minor and technical changes)? Do you agree that these issues are minor and technical? Please provide comments and feedback, including whether there are additional changes that Gas Industry Co should consider	

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<ul style="list-style-type: none"> • 	<p>For rule 61.1 the participant can only update the information once they become aware. The “become aware” portion needs to apply to the timeframe that the participant must update the registry.</p> <p>Nova supports the remainder of the changes.</p>
<p>Q8. Do you support the proposals in Section 11 (Non-regulatory changes)? Please provide comments and feedback, including whether there are additional changes that Gas Industry Co should consider</p>	
<ul style="list-style-type: none"> • Allow approved non-industry participants access to an ICP lookup API 	<p>Agreed</p>
<ul style="list-style-type: none"> • Allow use of the GIEP Exchange for GAA submissions / reports 	<p>Agreed</p>
<ul style="list-style-type: none"> • Make improvements to gas registry security 	<p>Agreed</p>
<ul style="list-style-type: none"> • Introduce a D+1 run report 	<p>Agreed</p>