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By email: consultations@gasindustry.co.nz

Submission on the Proposed Gas Information Exchange Protocols

Introduction

1. Bluecurrent welcomes the Gas Industry Company's (Gas Industry Co) consultation paper on the proposed additional *Gas Information Exchange Protocols* (GIEPs), dated May 2025.
2. We generally support the adoption of some of the Electricity Information Exchange Protocols for the gas market, covering information that is routinely exchanged between industry participants and consumers. This would promote consistency across the energy sector, considering that most gas consumers are also electricity consumers.
3. We particularly support the voluntary nature of the proposed and existing GIEPs which will preserve flexibility for future updates in the context of the gas sector transition. This would enable gas market participants to streamline their information exchange processes – ensuring consistency and compatibility with industry agreed standards – while maintaining the ability to innovate so they can deliver new and improved services to consumers.
4. With the introduction of advanced gas meters, we agree that it is appropriate to introduce new protocols that would help unlock and optimise the value of more granular and timely advanced meter data for industry participants and consumers. As an advanced gas metering service provider, we are happy to help shape the initial drafting of the proposed GIEPs.

Comments on the proposed GIEPs

5. We set out in the table below our comments on each of the proposed GIEP.
6. We also identify some of the limitations of the current GIEP processes that Gas Industry Co or the Advanced Gas Metering Infrastructure working group (AGMI working group) can help address to improve user experience and the flow of gas data.

Proposed GIEP	Bluecurrent's comments
GIEP4 – Customer information	Bluecurrent supports proposed GIEP4 which would be a voluntary protocol for the provision of detailed customer information from gas retailers to gas distributors. Gas retailers and distributors are best placed to determine the cost of any system changes to implement GIEP4.
GIEP4A – Medically Dependent Consumer information	We support proposed GIEP4A which would be a voluntary protocol for the provision of medically dependent consumer information from retailers to distributors.

Proposed GIEP	Bluecurrent's comments
	<p>We note that Gas Industry Co's first assessment of retailers' alignment with the gas industry guidelines, including the <i>Gas Consumer Care Guidelines</i>, in 2023 found that:</p> <p style="padding-left: 40px;">Responses to the self-assessment of alignment suggest that dual fuel retailers are fully or substantially aligned with most aspects of the Guidelines.¹</p> <p>We particularly note that dual-fuel retailers are either in "full alignment" or "substantial alignment" with the "additional recommendations for medically dependent consumers"² that form part of the <i>Gas Consumer Care Guidelines</i>.</p> <p>We look forward to Gas Industry Co's future assessment(s) of retailers' alignment with the gas industry guidelines covering all gas retailers.</p>
GIEP5A – Planned service interruptions	<p>We support proposed GIEP5A which would be a voluntary protocol for the provision of information on planned service interruptions from distributors to retailers.</p> <p>We believe the description of the gas data flow in the table on page 6 of the consultation paper (under section 3.1 Proposed protocols – Overview) needs to be corrected. The flow of gas data for GIEP5A should be from distributor -> retailer, not retailer -> distributor.</p> <p>Gas distributors and retailers are best placed to determine the cost of any system changes to implement GIEPA.</p>
GIEP5B – Unplanned service interruptions	<p>We support proposed GIEP5B which would be a voluntary protocol for the provision of information on unplanned service interruptions from distributors to retailers.</p> <p>As above, we believe the description of the gas data flow in the table on page 6 of the consultation paper (under section 3.1 Proposed protocols – Overview) needs to be corrected. The gas data flow for GIEP5B should be from distributor -> retailer, not retailer -> distributor.</p> <p>Gas distributors and retailers are best placed to determine the cost of any system changes to implement GIEP5B.</p>
GIEP12 – Price change notifications	<p>We support proposed GIEP12 which would be a voluntary protocol for the notification of delivery price changes from distributors to retailers.</p> <p>Gas distributors and retailers are best placed to determine the cost of any system changes to implement GIEP12.</p>

¹ www.gasindustry.co.nz/assets/CoverDocument/Retailer-Alignment-with-Guidelines-v2.pdf, page 2

² *Ibid.*, page 8

Proposed GIEP	Bluecurrent's comments
GIEP13A – Detailed consumption information	<p>We support proposed GIEP13A which would be a voluntary protocol that would apply when consumers (or their agent) access detailed consumption data (advanced gas meter data) from their retailer.</p> <p>As an advanced gas metering service provider, Bluecurrent may be required to support our customers (retailers) in the implementation of GIEP13A. We will need to assess the cost of any system changes as required by our individual customers to implement GIEP13A.</p>
GIEP13B – Summary consumption information	<p>We support proposed GIEP13B which would be a voluntary protocol that would apply when consumers (or their agent) access summary consumption information (advanced gas meter data) from their retailer.</p> <p>As an advanced gas metering service provider, Bluecurrent may be required to support our customers (retailers) in the implementation of GIEP13B. We will need to assess the cost of any system changes as required by our individual customers to implement GIEP13B.</p>
GIEP13C – Electronic request format for GIEP13A or 13B	<p>We support proposed GIEP13C which would be a voluntary protocol that would apply when consumers (or their agent) formally request consumption information (advanced gas meter data) from their retailer.</p> <p>As an advanced gas metering service provider, Bluecurrent may be required to support our customers (retailers) in the implementation of GIEP13C. We will need to assess the cost of any changes as required by our individual customers to implement GIEP13C.</p>
Procedures for requests for consumer consumption information	<p>We generally support the key topics that are proposed to be included in the document that will set out the procedures that apply to retailers when they respond to requests for information about a consumer's own gas consumption.</p> <p>We agree with the proposed key topics which include, among others:</p> <ul style="list-style-type: none"> • the information that retailers must provide; • how a consumer can request his/her consumption information; • how a consumer's agent can request consumption information; • the fee a retailer can charge; • timeframes for responding to the request; • what retailers must do to keep the information secure; • data format and transfer method; and • other information that would assist consumers and their agents make requests for consumption information.

Proposed GIEP	Bluecurrent's comments
Limitations of the current GIEP transfer process	<p>In addition to the above comments, we suggest that Gas Industry Co or the AGMI working group consider and address what we consider to be limitations of the current GIEP transfer process:</p> <ul style="list-style-type: none">• Users cannot view or confirm uploaded files after submission. We can see when the files have been uploaded successfully (green message pops out) but we are not able to see the breakdown of all the files that have been uploaded.• No notifications are issued when retailers have uploaded files.• Uploaded files disappear if not downloaded within a set timeframe.• There is a restriction on how users can name files when uploading them; a consistent naming structure must be followed. This means that when we request contact information, we are unable to name the file according to our preference or use a more meaningful file name.

Concluding comments

7. Bluecurrent looks forward to reviewing drafts of the additional voluntary GIEPs.
8. We are happy to further discuss any of the above comments with Gas Industry Co. Please contact Luz Rose (Senior Regulatory and Policy Partner) at Luz.Rose@bluecurrent.co.nz.
9. No part of this submission is confidential, and we are happy for Gas Industry Co to publish it in its entirety.

Yours sincerely



Matt Bostwick
Chief Customer Officer NZ