



Questions

Submission prepared by: **Matt Ritchie, Genesis Energy**

Question		Comment
Do you agree with the recommendations made by Gas Industry Co set out in this report? Please address your comments to each relevant recommendation separately (as set out below).		
Recommendation 1	Recommended development of a set of 'minimum standard' guidelines to better ensure the effective deployment of AGMI technology to consumers in a safe, efficient, fair, reliable, and environmentally sustainable manner, and better ensure the delivery of an efficient, competitive market structure for the provision of gas metering services (AGMI Guidelines).	Development of minimum standard guidelines is Genesis' preferred approach, on the proviso that compliance with the guidelines is voluntary (albeit with the option of regulation to follow if circumstances demand it).
Recommendation 2	Recommended list of identified AGMI issues, and Gas Industry Co's priority categorisation of the same.	GIC has identified a wide range of 'issues' associated with Advanced Gas Metering Infrastructure, which are worthy of discussion. Many issues are analogous to those experienced in the deployment of advanced electricity meter infrastructure in the New Zealand market. Genesis agrees that it is worthwhile to comprehensively survey the market in the interests of being prepared when issues may arise. However, given the relatively concentrated nature of the gas metering environment in New Zealand, the early stage of deployment of AGMI here, and available resource, it is prudent to be selective when translating the list of issues into a work programme for development of guidelines. This is discussed further in respect of the AGMI Group's work programme in response to Recommendation 4.
Recommendation 3	Recommended utilisation of an updated TARMAC group as the appropriate working group to work with Gas Industry Co	Genesis agrees a working group (AGMI Group) would be the logical body for development of minimum standard guidelines and should be

	to develop solutions for AGMI issues identified through this workstream.	convened as a priority. Genesis would be eager to be represented on this group.
Recommendation 4	Recommended updated terms of reference for the TArMAC group (to be renamed the AGMI Group).	<p>Genesis agrees with the updated terms of reference.</p> <p>However, and to reiterate the point in response to Recommendation 2, Genesis considers the scope of work should be rationalised initially to ensure progress is made on those areas that offer the most tangible benefit.</p> <p>Given the small number of participants in the New Zealand gas market (relative to electricity), it is not obvious that development of a model Gas Metering Service Agreements would have benefits commensurate with the demands this would place on the AGMI Group. There are several issues that are proposed to be addressed through the alignment of GMSAs, it may be more efficient to select the highest priority (if indeed this work is worth elevating above or alongside the issues highlighted below) to pursue as discrete work programme items.</p> <p>Consumers will receive the greatest benefit from AGMI if deployment balances competition with the ability to innovate. Accordingly, in our view, the highest priority work will focus on developing guidelines to ensure the efficient interoperability of systems that rely on metering data.</p> <p>Priority should be given to developing minimum standards and file formats recommendations. More importantly than file formats, however, guidelines should include a minimum dataset for delivery MSPs are expected to supply irrespective of any additional service or dataset they may offer as a differentiator from competitors.</p> <p>Similarly, considering what changes to downstream reconciliation and registry rules and processes are necessary to efficiently integrate AGMI, and ensure the full consumer benefit can be realised, should be a</p>

		<p>priority. This work should include how AGMI data is integrated into the D+1 allocation process.</p> <p>If the above work can be progressed in a timely fashion, Genesis considers that several other issues on the proposed scope of work (in respect of data access) would be resolved and accordingly would be appropriately be consigned to a 'watching brief'.</p> <p>Genesis is particularly eager to develop standards in respect of remote reconnections and disconnections. We agree that consumer benefits are likely to flow from this functionality. Industry standard processes for using this tool in a way that ensures consumer safety first and foremost should be a priority for the AGMI Group. These standards could be incorporated into the Consumer Care Guidelines currently under development.</p>
Recommendation 5	Recommended changes to the TArMAC group membership group (to be renamed the AGMI Group).	Genesis agrees the group membership is appropriate, providing suitably qualified representatives of the consumer (residential and SME) segment can be identified. Genesis is eager to participate in this group.