



7 February 2025

Andrew Knight  
Chief Executive Officer  
Gas Industry Company Limited

Dear Andrew,

**Re: Consultation on Gas Industry Co FY2026 Work Programme and Levy**

This submission concerns GIC's proposal that it purchase the emsTradepoint gas trading platform.<sup>1</sup>

As co-regulator of the Gas Industry, GIC is responsible for oversight and regulation of the gas wholesale market (i.e. pursuant to s 43F(2)(a) of the Gas Act). GIC's constitution authorises activity only to the extent permitted by the Gas Act.

The Act does not authorise the GIC to operate a wholesale market. Such an operation would be incompatible with GIC's regulatory functions, and ultra vires.

Greymouth opposes GIC's purchase of the emsTradepoint gas trading platform.

Yours sincerely

Chris Boxall  
Commercial Manager

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<sup>1</sup> Page 12 of the consultation paper.