## Nova Energy submission: Gas Industry Co. Work programme & levy for 2024

Paul Baker, Commercial & Regulatory Manager

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Question		Comment
Q1:	Do submitters agree with Gas Industry Co's assessment of the strategic context?	Yes. Nova agrees with the GIC's assessment, in particular its notes under the Gas Transition Plan and Energy Transition.
		There is pressure on the gas industry to support security of electricity supply in the interim as other renewable energy options are developed. It is within the scope of the Gas Transition Plan to address such issues, and the resources the GIC is putting to that are appropriate, albeit that much of the work is taking place in the current financial year.
		However the gas transition plan cannot stand alone. The primary focus for 2024 must be on ensuring the gas transition plan is integrated with the New Zealand Energy Strategy (NZES). If New Zealand is to sustain energy security over the long-term then the NZES must support sufficient gas exploration and development to enable the transition from reliance on fossil fuels as a base-load energy source to becoming a highly flexible source of reserve energy. Gas supplies will need to be sufficiently robust and flexible to support seasonal variations in demand, peak electricity demand, and plant outages (planned and unplanned).
		Nova agrees there is an issue with "Investment in ongoing field development, and solutions to investment confidence issues identified in the 2021 gas market settings investigation, where those are not fully addressed in the Gas Transition Plan."
Q2:	Do submitters have any comment on the process for developing Gas Industry Co's FY2024 Work Programme and Levy?	There could be value in increased 1:1 engagement with key stakeholders prior to the co-regulatory forum.
Q3:	Do you consider there to be any other items that should be included in Gas Industry Co's intended Work Programme for FY2024? If so, please describe the work required and how that work achieves the outcomes sought under the Gas Act and GPS.	No

Question		Comment
Q4:	Do you consider there to be any items that should be excluded from Gas Industry Co's intended Work Programme for FY2023? Please provide reasons for your response.	No No
Q5:	Gas Industry Co is particularly interested in industry comment on the forecast gas volumes - do stakeholders consider the 170 PJ projection reasonable? If not, what would they consider an appropriate gas volume estimate to be? NOTE – any submissions provided in response to this question will be treated as confidential and will not be published.	Confidential.
Q6:	Do you have any comment on the proposed levy rates for FY2024?	Nova supports the levy rates.