

## Nova Energy submission: Advanced Gas Metering Infrastructure – Submissions Review and Recommendations

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| Question   | Comment   |
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| <p>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).</p>   |   |
| <p><b>Recommendation 1.</b><br/>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).</p> | <p>Nova supports the development of minimum standard guidelines around the efficient and competitive deployment of AGMI.</p> <p>An important aspect of this is ensuring that gas distributors do not use their monopoly control over customer connections to dictate what happens with customer metering, as has happened with some electricity networks.</p>   |
| <p><b>Recommendation 2.</b><br/>Recommended list of identified AGMI issues, and Gas Industry Co's priority categorisation of the same.</p>   | <p>Issue # &amp; Nova response:</p> <ol style="list-style-type: none"> <li>1. Agree</li> <li>2. Agree</li> <li>3. Agree</li> <li>4. Agree</li> <li>5. Agree</li> <li>6. Propose that MSP's should have a default GMSA approved by the GIC that applies in cases where the retailer does not have a GMSA negotiated and signed with the MSP. Each default GMSA can be unique to the MSP, but it must be publicly available.</li> <li>7. Agree that this must be discussed. Retailers must have an economic avenue for terminating charges at an ICP where there is no consumer.</li> <li>8. Disagree on priority. This is low risk</li> <li>9. Do not support centralised data provider. Agree with setting minimum standards, and with Vector on application of APIs</li> <li>10. Despite lack of submissions, the question of meter displacement should be given higher priority. This is because MSPs are looking to contract with retailers at this time.</li> <li>11. Nova does not support Open Access AGMI systems. It agrees with the views of Vector &amp; Intellihub.</li> </ol> |

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|   | <p>12. Nova agrees with the views of Vector and Intellihub so long as retailers can specify replacement of an inferior AGMI with a superior solution then MSPs will be incentivised with anticipating the market's requirements and meeting those.</p> <p>13. Strongly disagree. This is a complex area and should be given greater priority. For instance, is the ownership of the wider GMS covered by the distributors' regulated returns under the Commerce Act? Nova believes the MSP's should be able to review and upgrade the GMS at an ICP should that be necessary.</p> <p>14. Agree</p> <p>15. Agree</p> <p>16. Agree</p> <p>17. Disagree that this is an 'A' priority</p> <p>18. Disagree that this is an 'A' priority</p> <p>19. Agree</p> <p>20. Agree</p> <p>21. Agree</p> <p>22. Agree</p> |
| <p><b>Recommendation 3.</b><br/>Recommended utilisation of an updated TArMAC group as the appropriate working group to work with Gas Industry Co to develop solutions for AGMI issues identified through this workstream.</p> | <p>Nova favours the input of an industry grouping to resolve issues that may arise with wide implementation of AGMI.</p>   |
| <p><b>Recommendation 4.</b><br/>Recommended updated terms of reference for the TArMAC group (to be renamed the AGMI Group).</p>   | <p>Nova agrees with the terms of reference.<br/>Presumably the group itself will determine the frequency of meetings.<br/>It is important the GIC ensures there is adequate secretarial support to sustain the number of workstreams proposed.</p>   |
| <p><b>Recommendation 5.</b><br/>Recommended changes to the TArMAC group membership group (to be renamed the AGMI Group).</p>  | <p>Nova supports the proposed make-up of the AGMI Group and the principles of its operation.<br/>It is appropriate that the GIC retains the right to accept nominations so that appointees have the appropriate level of experience and authority in their organisations.</p>  |