



Proposed Determinations and Notifications under Gas (Downstream Reconciliation) Rules 2008 and other implementation matters

Consultation Paper

13 June 2008





About Gas Industry Co.

Gas Industry Co was formed to be the co-regulator under the Gas Act.

As such, its role is to:

- recommend arrangements, including rules and regulations where appropriate, which improve:
 - the operation of gas markets;
 - access to infrastructure; and
 - consumer outcomes;
- administer, oversee compliance with, and review such arrangements; and
- report regularly to the Minister of Energy on the performance and present state of the New Zealand gas industry, and the achievement of Government's policy objectives for the gas sector.

Authorship

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Executive Summary

The Gas (Downstream Reconciliation) Rules 2008 (the “Reconciliation Rules”) provide for the establishment of efficient and effective downstream allocation and reconciliation arrangements. The Reconciliation Rules provide for Gas Industry Co, as the industry body approved under the Gas Act 1992, to determine and notify certain technical details under the rules.

This consultation paper releases for formal consultation:

- The proposed information exchange file formats (attached as Appendix B). Rule 25 of the Reconciliation Rules delegates to Gas Industry Co the ability to notify information exchange file formats (“File Formats”) after consulting with allocation participants. The proposed File Formats have been developed by an industry working group. A draft of the proposed File Formats was widely circulated for industry feedback in April 2008.
- The proposed information requirements from transmission system owners (including the timing requirements for transmission system owners to provide estimated day-end volume injection quantities, to be notified under rule 42).
- For the gas year beginning 1 October 2008, the proposed percentage of accuracy between the consumption information provided for final allocation and the consumption information provided for initial allocation. Rule 37.3 of the Reconciliation Rules provides for Gas Industry Co to determine and publish this percentage of accuracy after consulting with allocation participants.
- Information on the groups of gas gates that Gas Industry Co intends to determine and publish as single gas gates for the purposes of the Reconciliation Rules (see the definition of gas gate in rule 5 of the Reconciliation Rules).

In relation to the matters where Gas Industry Co is required to consult, the obligation is to consult with allocation participants. However, Gas Industry Co welcomes formal submissions from any affected person on any of the matters detailed in this paper.

Gas Industry Co seeks submissions:

- On the proposed File Formats by Friday, 27 June 2008; and
- On the proposed information requirements from transmission system owners, proposed percentage of accuracy, proposed groupings of gas gates and all other consultation matters detailed in this paper by Friday, 11 July 2008.

Other matters discussed in this consultation paper where industry feedback is welcomed by Friday, 11 July, include:

- Additional information exchanges and reports that are associated with downstream allocation and reconciliation (particularly in relation to other information exchanges between the allocation agent and allocation participants).

- A discussion on “gas measurement systems” and the definition of gas gate.

Finally, for completeness, this paper presents a summary of other implementation work that Gas Industry Co or the allocation agent will need to progress to deliver the downstream reconciliation go-live date of 1 October 2008.

Contents

Executive Summary	5
1 Purpose of Consultation	1
2 Background	3
3 Consultation on the proposed File Formats (submissions due Friday, 27 June 2008)	4
Background information on the proposed File Formats	4
General comments/issues (relevant to all File Formats)	6
GIEP20	8
GIEP21	9
GIEP22	10
GIEP23	10
GIEP24	11
4 Other matters for Consultation (submissions due Friday, 11 July 2008)	16
Proposed percentage of error – consumption information	16
Consultation on the proposed groupings of gas gates	20
Information from transmission system owners	21
Additional information exchanges	23
Notifications to the allocation agent	27
A discussion on “gas measurement systems” and the definition of “gas gate”	28
5 Other Implementation matters	31

6	Submission Requirements	34
<hr/>		
Appendix A	Recommended Format for Submissions	35
	Consultation on the proposed File Formats (submissions due Friday, 27 June 2008)	35
	Matters for Consultation by Friday, 11 July 2008	36
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Appendix B	Proposed File Formats	40
	File naming convention	40
<hr/>		
Appendix C	Proposed codes for allocation participants and gas gates	59
<hr/>		
Appendix D	Information exchanges from the allocation agent to Vector Transmission	67

1

Purpose of Consultation

The Gas (Downstream Reconciliation) Rules 2008 (the “Reconciliation Rules”) provide for the establishment of efficient and effective downstream allocation and reconciliation arrangements. The Reconciliation Rules provide for Gas Industry Co, as the industry body approved under the Gas Act 1992, to determine and notify certain technical details.

This consultation paper presents for formal consultation:

- The proposed File Formats to be notified by Gas Industry Co under rule 25.
- The proposed information requirements from transmission system owners (including the timing requirements for transmission system owners to provide estimated day-end volume injection quantities, to be notified under rule 42).
- The proposed percentage of accuracy to be determined by Gas Industry Co under rule 37.3.
- The proposed groups of gas gates that Gas Industry Co intends to determine and publish as single gas gates for the purposes of the Reconciliation Rules (see the definition of gas gate in rule 5).

Following consideration of the submissions received, Gas Industry Co will progress to determining or notifying (as applicable) these matters in accordance with the Reconciliation Rules.

In making submissions, Gas Industry Co urges submitters to distinguish between issues of principle and transitional issues. For example, a submitter may agree in principle with the structure of the proposed File Formats, but may face problems complying with the proposed formats as at the go-live date. These issues are being treated by Gas Industry Co separately (one issue relates to the design of the notifications/determinations, whereas the other relates to the possible need for an exemption). However, Gas Industry Co acknowledges that the process of considering the proposals discussed in this paper may cause allocation participants to identify areas where they may seek exemptions. Accordingly, Gas Industry Co has provided in this paper the ability for allocation participants to identify possible exemptions that they may seek.

In addition to matters specified in the rules, Gas Industry Co is consulting on a number of other matters related to the implementation of the Reconciliation Rules. These include:

- Additional information exchanges and reports that are associated with downstream allocation and reconciliation (particularly in relation to information exchanges between the allocation agent and allocation participants).
- A discussion on “gas measurement systems” and the definition of “gas gate”.

Gas Industry Co is not required by the Reconciliation Rules to consult on any of these matters. However, Gas Industry Co wishes to extend this opportunity for allocation participants and other persons to provide feedback. Submissions received will help inform Gas Industry Co’s processes and ensure that all relevant factors are appropriately taken into account.

The issues discussed in this paper form only part of the implementation programme to achieve the go-live date of 1 October 2008. For completeness, other implementation work is presented in Part 5 of this paper. This implementation information is primarily provided for clarification purposes. However, submitters are welcome to comment on this programme of work.

2

Background

The Government Policy Statement on Gas Governance (“GPS”) and the Gas Act 1992 read together invite Gas Industry Co to recommend to the Minister of Energy arrangements for more effective and efficient downstream allocation and reconciliation of gas quantities.

After extensive consultation, Gas Industry Co recommended in March 2008 that the Minister of Energy establish rules under the Gas Act 1992 for downstream allocation and reconciliation. The Reconciliation Rules were approved by the Minister and gazetted on 29 May 2008. The Reconciliation Rules are available on Gas Industry Co’s website at www.gasindustry.co.nz. Those parts of the Reconciliation Rules relating to implementation will come into effect on Friday, 27 June 2008.

The Reconciliation Rules provide for the determination and notification of certain technical details by Gas Industry Co, as the industry body. This paper releases for consultation Gas Industry Co’s proposals in relation to matters to be notified (under rules 25 and 42) and determined (under rules 37.3 and rule 5). This paper also welcomes submissions on a number of other matters related to the implementation of the Reconciliation Rules.

Background information related to each of the particular matters presented for consultation is presented in this paper with the discussion on that particular matter.

3

Consultation on the proposed File Formats (submissions due Friday, 27 June 2008)

This Part of the paper presents the proposed File Formats for consultation. There is a shortened consultation period for submissions on the proposed File Formats. This shortened period takes into account the previous opportunities provided for industry feedback. Accordingly, Gas Industry Co seeks submissions on the issues discussed in this Part of the paper by Friday, 27 June 2008.

The proposed File Formats are attached in Appendix B. Each file format notes the Reconciliation Rules to which it relates. Numerous issues were considered by the Information Exchange File Formats Working Group (IEFFWG) and Gas Industry Co in the development of the file formats, these issues and background information on the development of the File Formats is presented below.

Background information on the proposed File Formats

Some time ago gas industry participants attempted to develop Gas Information Exchange Protocols and these were progressed to a 'near final draft'. However, progress on these stalled in 2004.

As a result, there is currently no agreed file format for the exchange of industry information, including no agreed format for the submission of allocation information to the industry appointed allocation agent. Industry participants submit information to the current allocation agent in different file types (e.g. some submit in excel and some submit in csv) and using different formats. This process is less than optimal and likely results in errors. Accordingly, Gas Industry Co has consistently recommended, and the Reconciliation Rules provide for, the development of binding information exchange file formats.

Rule 25 of the Reconciliation Rules states:

25.1 For the purpose of information exchanges between **allocation participants** and the **allocation agent** under one or more of these **rules**:

25.1.1 The **industry body**, after consulting with **allocation participants**, may give notice to **allocation participants** specifying one or more

information exchange file formats that **allocation participants** must provide information to the **allocation agent** in; and

- 25.1.2 No later than 3 months after receiving the notice, **allocation participants** must provide information to the **allocation agent** in the exchange file formats specified in the notice.

Gas Industry Co recognises that significant industry input is required to deliver workable file formats. Accordingly, in March, Gas Industry Co convened the IEFFWG to assist with the development of the File Formats. This group is chaired by Lucy Elwood (Elwood Consulting Limited) and also consists of Danny McManamon (Contact), Jason Christini-Crawford (Genesis Energy), Sue Simons (Powerco) and Tony Hooks (Vector). Gas Industry Co wishes to particularly thank the members of the IEFFWG for their contributions.

The IEFFWG developed an initial draft of the proposed File Formats based on the draft Gas Information Exchange Protocols. However, considerable changes were required to reflect the requirements in the draft reconciliation rules. An initial draft of the proposed File Formats was provided by the IEFFWG to Gas Industry Co in early April 2008. This draft was reviewed by Gas Industry Co and provided by Gas Industry Co to industry participants for feedback in late April 2008.

The feedback received from the industry was positive and was considered by the IEFFWG in the development of the proposed File Formats. The development of the proposed File Formats was also discussed at the Gas Registry and Reconciliation Establishment Committee (GRREC) meetings, attended by a range of allocation participants.

Industry feedback, IEFFWG input and oversight from the GRREC and Gas Industry Co has resulted in the development of the proposed File Formats attached in Appendix B.

Gas Industry Co will consider submissions on the proposed File Formats in Appendix B and aims to notify the final formats as promptly as possible. Gas Industry Co appreciates that allocation participants need certainty regarding the file formats in order to each confirm the operational changes that will be necessary to comply with the Reconciliation Rules.

The first information exchanges to be provided under the Reconciliation Rules will be the provision of consumption information on the 4th business day of November. If all allocation participants were to be bound to use the proposed File Formats at that date, the File Formats would need to be notified by Gas Industry Co no later than 4 August 2008. Depending on the complexity of the issues raised by allocation participants in response to this consultation paper, Gas Industry Co aims to notify the finalised File Formats in advance of this date.

To assist an early notification date, Gas Industry Co has provided a reasonably short period for consultation (of two weeks). Gas Industry Co considers this is appropriate given the opportunity allocation participants have had since mid April to comment on File Format issues.

General comments/issues (relevant to all File Formats)

The IEFFWG and Gas Industry Co considered a number of general file format issues, including:

- *File type* – the current industry appointed allocation agent performs the allocation services using Microsoft Excel and most allocation participants currently submit information to that allocation agent in an Excel file. However, the IEFFWG considered that the csv file type is more appropriate long term. Accordingly, all of the proposed File Formats dictate the exchange of information as a csv file.
- *File naming protocol* – a standard file naming protocol needs to be developed and a file naming protocol is proposed in Appendix B. However, the contractual negotiations with the allocation agent will include the design of the method by which allocation participants submit information to the allocation agent (e.g. uploads to a secure web site, encrypted emails or other means). The methodology which the allocation agent appointed under the Reconciliation Rules adopts may affect the file naming protocol. Accordingly, Gas Industry Co may need to seek further industry feedback on this issue in the future.
- *Single month data* – Gas Industry Co considered whether it is worth stipulating that files must only contain data for a single month, for one allocation participant and must be complete (i.e. allocation participants can not send through numerous partial files each month). However, such stipulations may be unnecessary and may be difficult to comply with in practice (Gas Industry Co understands some retailers have different personnel responsible for compiling the reports e.g. one employee compiles the TOU reconciliation report and another employee the mass-market reconciliation report). These stipulations may need further consideration in the future if the appointed allocation agent experiences difficulties with file submissions.
- *Change control process and other supporting documents* – It is inevitable that some changes to the proposed File Formats will be required over time. This issue was of concern to the IEFFWG, as both out-of-date File Formats and frequently changing File Formats can have large industry compliance costs. The IEFFWG also recognised that other documentation should be developed (e.g. guides describing the application of each File Format and an over-arching principles document discussing the general approach to file formats (including consistency with Electricity Information Exchange Protocols, where appropriate, the interrelationship between Determinations made by Gas Industry Co under the Gas (Switching Arrangements) Rules 2008 (the “Switching Determinations”) and notifications/determinations made under the Reconciliation Rules). Gas Industry Co acknowledges that a formalised change control process and industry guides/supporting documentation is desirable but not urgently required. Gas Industry Co anticipates developing such documentation after the initial go-live for both projects to incorporate details and lessons learned during implementation.
- *Requirements to submit* – The current industry appointed allocation agent has on occasion had difficulty interpreting whether the failure of a retailer to submit consumption information for a gas gate suggests that the retailer has no active installations at a gas gate or has neglected to provide consumption information. One suggestion was that all retailers could submit consumption information for all gas gates (regardless of whether the retailer traded at that gas gate). This

suggestion was rejected by retailers (as inefficient) and is not adopted in the proposed File Formats. Gas Industry Co notes that the requirement in rule 39 for requires retailers to notify trading changes at any gas gate may help ameliorate this problem.

- *One or multiple submission formats* – Retailers are required under the Reconciliation Rules to submit slightly different consumption information for different allocation groups. The IeffWG considered developing a single format which would cover all allocation groups (and include fields that were mandatory for some allocation groups and optional for others). This approach was ruled out as too operationally complex. Accordingly, the proposed File Formats include a different format for each allocation group or groups with different consumption information submission requirements (GIEP20 for allocation groups 4 and 6, GIEP 21 for allocation groups 1,2 and 3 and GIEP22 for allocation group 5).
- *Inclusion of HDR and DET as a field* – The majority of the IeffWG supported including “HDR and DET” as fields in each file format, to clearly identify header and detail rows. It was noted that DET is required in some “industry” (the term used liberally here to refer to electricity and gas) file formats and not required in others. Allocation participants should advise if the inclusion of HDR and DET will give rise to inefficient compliance costs.
- *Field descriptions, types and rules* – The IeffWG put some effort into considering the proper construction of each of the file formats. Suggestions or comments on these matters (e.g. the number of digits assigned to each field, the number of decimal points for a field, the expression of fields (e.g. Numbers or Characters) are welcome. It is noted that numerical fields (e.g. the amount of UFG in GJ) can all be positive or negative. Gas Industry Co noted that there are some differences between the field definitions in the proposed File Formats and those used elsewhere by the gas industry. For example, Gas Industry Co notes that OATIS includes provision for injection quantities in GJ of up to 9999999999.999 (i.e. 10.3) whereas the current file formats propose a limit of 99999999.999 (8.3). Are these differences material (for example, would the expression of GJ information as “Num (10.3)” be more appropriate?). Gas Industry Co welcomes feedback on these points.
- *Number of fields in the header rows* – The IeffWG has included the information in the header rows that is necessary. This has resulted in some headers having differing numbers of rows (e.g. some file formats have 8 header rows and others have 9). It was considered whether to mandate a standard number of header fields/rows, as this may be easier for the automated systems of some retailers to process. This could be achieved by adding a “NULL” field at the end of some of the file format header records. The proposed File Formats do not adopt this approach. This is because the IeffWG and Gas Industry Co understand that it would be reasonably straightforward for any affected allocation participants to design a ‘patch’ programme (e.g. a programme which would insert the necessary commas into the file formats to make the number of header rows consistent between file formats). Also, as noted below, Gas Industry Co intends to negotiate in the allocation agent service provider agreement that allocation participants can negotiate directly with the allocation agent for the provision of special reports or information (probably on direct payment to the allocation agent for the allocation agent’s additional costs in performing the additional services). This provides an alternative option for allocation participants that need the information presented in a different structure, especially on a transitional basis.
- *Consistency of codes* – Gas Industry Co appreciates that consistency of codes between rules is important. Accordingly, the gas gate codes and the allocation participant codes will be as determined by Gas Industry Co in the Switching Determination (once published) and as amended

through that process from time to time. However, Gas Industry Co proposes to expand these codes to also include the addition of:

- “ALLA” for Allocation Agent;
 - “APAR” for Allocation Participant; and
 - the proposed codes for the groupings of gas gates (i.e. notional delivery points) to be treated as single gas gates for the purposes of the Reconciliation Rules (see discussion below).
- *Direct provision* – The proposed File Formats allow for the direct provision to allocation participants of the information in GIEP 25, GIEP26, GIEP28 and GIEP29, in addition to the publication of that information on the allocation agent’s website. The direct provision of this information was included in response to industry requests. Gas Industry Co will negotiate this provision as part of the allocation agent service provider agreement. An advantage of direct provision is that the relevant information can likely be provided to allocation participants ahead of the publication date required under the rules – although the precise dates for direct provision are still yet to be negotiated.
 - *Information for distributors* – Distributors have also expressed an interest in being provided with copies of GIEP 24, GIEP 27, GIEP30 and GIEP 31 in respect of the gas gates on the distributor’s distribution network (particularly in relation to gas gates that are contestable – i.e. where more than one retailer trades). Gas Industry Co considers that the provision of this information will provide greater transparency between allocation participants, and will ultimately lead to an increased ability to identify and resolve any UFG issues. However, Gas Industry Co appreciates that retailers may not be inclined for this information to be made available to distributors. Gas Industry Co’s preliminary view is that this information should be made available to distributors in respect of gas gates on the distributor’s distribution network. However, submissions on this point are welcomed.

Q1: Do submitters have any general comments on the proposed File Formats, including any comments on the issues considered by the IEFWWG and Gas Industry Co in the development of the proposed File Formats? Are there any additional File Formats that submitters consider are required?

GIEP20

GIEP20 relates to the provision of consumption information by retailers to the allocation agent for allocation groups 4 and 6. Under the Reconciliation Rules, every retailer must provide, in respect of the consumer installations for which it is the responsible retailer, the aggregate estimated energy quantities by gas gate for all consumer installations in allocation groups 4 and 6 to the allocation agent:

- for initial allocations, by 0800 hours on the 4th business day of the month that immediately follows the consumption period to which the information relates (see rule 31.4);
- for interim allocations, by 0800 hours on the 9th business day of the 4th month that follows the consumption period to which the information relates (see rule 32.4);

- for final allocations, by 0800 hours on the 14th business day of the 13th month that follows the consumption period to which the information relates (see rule 33.4).

In addition to the general issues noted above, the following issues were considered by the IeffWG and Gas Industry Co in the development of GIEP20:

- *Inclusion of TOU devices with less than 10TJ consumption* – There was a suggestion from some IeffWG members that retailers should be able to opt (at their discretion) whether to treat a TOU customer (with annual consumption larger than 250GJ but less than 10TJ) as allocation group 4 or allocation group 2, and consequently whether to submit the consumption of that ICP within the GIEP20 file or the GIEP21 file. This was rejected by Gas Industry Co as it is inconsistent with the Reconciliation Rules. However, Gas Industry Co appreciates that the Reconciliation Rules may need to be reconsidered over time, in particular this may be appropriate if any retailer was considering large scale roll-out of ‘smart meters’ in a manner that would not align with the definitions in the rules. Note: This issue also impacts on GIEP21.
- *ICP count* – It was suggested to include a mandatory requirement for retailers to provide an installation count in the GIEP20 submission as this would assist the assessment of the identification of the causes of UFG and identification of compliance issues. Gas Industry Co understands that, due to existing system constraints, some retailers would face inefficient compliance costs if forced to include the installation count. As this information is not required to be provided under the Reconciliation Rules, the installation count is not included as a mandatory requirement in the proposed File Formats. However, Gas Industry Co has included a placeholder for this in the form of an optional submission field. At this stage as the field is optional, retailers can choose whether or not to include this information. Gas Industry Co intends to develop a process to consider this issue further following the implementation of the rules. However, as Gas Industry Co appreciates that changes to the structure of the file formats may have large compliance costs (depending on a retailer’s IT system constraints) a placeholder ‘optional field’ has been included pending full consideration of the issue.
- *Historic Estimate Information* – Rule 40.1 of the Reconciliation Rules requires retailers to provide information on the amount of consumption reported as a Historic Estimate for the previous initial, interim and final allocation for each gas gate by 0800 on the first business day of each month. The provision of this information is specified as a mandatory field in this submission, despite this submission being provided earlier than the dates specified in rule 40.1. This is because allocation participants have indicated a preference to include this information in this file rather than send a separate file to the Allocation Agent with this information at a later date.

Q2: Do submitters have any comments on GIEP20, including the additional issues considered in the development of GIEP20?

GIEP21

GIEP21 relates to the provision of consumption information by retailers to the allocation agent for allocation groups 1, 2 and 3. Under the Reconciliation Rules, every retailer must provide, in respect of the consumer installations for which it is the responsible retailer, the actual daily energy quantities for

each consumer installation in allocation groups 1 and 2 and the estimated daily energy quantities for each consumer installation in allocation group 3 to the allocation agent:

- for initial allocations, by 0800 hours on the 4th business day of the month that immediately follows the consumption period to which the information relates (see rules 31.1 and 31.2);
- for interim allocations, by 0800 hours on the 9th business day of the 4th month that follows the consumption period to which the information relates (see rules 32.1 and 32.2);
- for final allocations, by 0800 hours on the 14th business day of the 13th month that follows the consumption period to which the information relates (see rules 33.1 and 33.2).

Q3: Do submitters have any comments on GIEP21?

GIEP22

GIEP22 relates to the provision of consumption information by retailers to the allocation agent for allocation group 5. Under the Reconciliation Rules, every retailer must provide, in respect of the consumer installations for which it is the responsible retailer, the aggregated estimated daily energy quantities by gas gate by profile for consumer installations in allocation group 5 and the number of consumer installations included to the allocation agent:

- for initial allocations, by 0800 hours on the 4th business day of the month that immediately follows the consumption period to which the information relates (see rule 31.3);
- for interim allocations, by 0800 hours on the 9th business day of the 4th month that follows the consumption period to which the information relates (see rule 32.3);
- for final allocations, by 0800 hours on the 14th business day of the 13th month that follows the consumption period to which the information relates (see rule 33.3).

Q4: Do submitters have any comments on GIEP22?

GIEP23

GIEP23 relates to the provision of information on the frequency of meter reads. Rule 40.2 requires that by 1200 hours on the 10th business day of October in each gas year a report on the number and percentage of validated register readings obtained in accordance with rule 29.4.3 and 29.5 during the previous gas year. Rule 29.4.3 requires that all consumer installations with non-TOU meters to which the retailer has continuously supplied gas for the previous 12-month period must have registered readings recorded at least once every 12-months unless exceptional circumstances prevent such an interrogation and rule 29.5 requires that every retailer must ensure that a validated register reading is obtained at least once every 4 months for 90% of the consumer installations with non-TOU meters to

which the retailer has continuously supplied gas for the previous 4 months. For the purposes of these rules, any reference to non-TOU meters includes a TOU meter assigned to allocation groups 5 or 6.

The development of GIEP23 was a difficult balance between the strict requirements of the Reconciliation Rules, the operational constraints of allocation participants and the provision of information that may be useful but is not strictly required by the rules (e.g. useful to identify causes of UFG).

The Reconciliation Rules envisage an annual submission of meter reading frequency information. However, operationally retailers identified this is difficult and retailers expressed a preference for the collection of data monthly.

The proposed GIEP23 File Format is prepared on the basis that retailers will submit an annual report. However, Gas Industry Co welcomes submissions from retailers on whether they would prefer to submit a monthly report (and have the allocation agent collate this information at the end of the gas year into an annual report). If a monthly report is preferred, Gas Industry Co could change the File Format and negotiate with the allocation agent for collation. Alternatively, it may be possible to specify both an annual report and a monthly report, and leave the choice at the option of retailers.

The IEFWWG also discussed whether GIEP23 could require the breakdown of meter reading frequency information by gas gate (rather than aggregated across all gas gates) and the inclusion of the consumer installation count. Gas Industry Co considers that the inclusion of consumer installation count is useful (and the proposed GIEP23 includes the consumer installation count as additional information to assist consideration of this file) but that a per gas gate breakdown of meter frequency information is not required at this time (due to potential compliance costs).

Gas Industry Co will consider information provided under this report carefully. If meter reading frequencies are low, it may be necessary to introduce more stringent requirements in the future (such as requiring the report to be broken down to the gas gate level to better monitor compliance).

Q5: Do submitters have any comments on GIEP23 or the additional issues considered in the development of GIEP23?

Q6: Do retailers prefer, from an operational perspective, the provision of meter reading frequency information annually or monthly?

GIEP24

Under rule 52.2.1 each retailer must provide as-billed information by 0800 hours on the 11th business day of each month to enable the allocation agent to perform an annual reconciliation. The allocation agent will compare the total quantities billed for the previous 12 billing months with the best available

consumption information provided by each retailer for the previous 12 billing months and publish the results of the comparison by 0800 business hours on the 14th business day of each month. Allocation participants are referred to the definition of “previous billing month” in rule 52.3.1 when interpreting their obligations under this file.

Q7: Do submitters have any comments on GIEP24?

GIEP25

GIEP25 relates to rule 46.4.1. Under rule 46.4.1 the allocation agent must determine and publish the monthly UFG factor which applies for each month:

- for initial allocations by 0800 hours on the 5th business day of each month;
- for interim allocations by 0800 hours on the 11th business day of each month; and
- for final allocations by 0800 hours on the 16th business day of each month.

GIEP25 provides a file format for this information and also requires the allocation agent to provide this information directly to all allocation participants in addition to publishing the information.

Q8: Do submitters have any comments on GIEP25?

GIEP26

GIEP26 relates to rule 46.4.2. Under rule 46.4.2 the allocation agent must determine and publish the annual UFG factor which will apply for each gas year by the 1st business day of July in the previous gas year. As with GIEP25, the proposed GIEP26 File Format goes the extra step of requiring direct provision of this information to allocation participants in addition to publication.

Gas Industry Co notes that the requirements in relation to the annual UFG factor are different during the transitional period by virtue of rule 79. As noted in Part 5 of this paper, further information on the timeframe and likely process for the calculation of annual UFG factors for the gas year commencing 1 October 2008 will be made available following appointment of the allocation agent.

Q9: Do submitters have any comments on GIEP26?

GIEP27

GIEP27 relates to rules 48.2.2(a), 49.2.2(a), 50.2.2(a) and 51. Under these rules the allocation agent must provide reports to each retailer setting out the quantities of gas allocated to that retailer at each gas gate for the relevant consumption period by:

- 0800 hours on the 5th business day of each month in relation to initial allocations (see rule 48.2);
- 0800 hours on the 11th business day of each month in relation to interim allocations (see rule 49.2);
- 0800 hours on the 16th business day of each month, in relation to final allocations (see rule 50.2); and
- If requested by Gas Industry Co in accordance with rule 51 in relation to special allocations.

As noted in the 'general comments' on the proposed File Formats, Gas Industry Co also intends for this report to also be made available to distributors in relation to gas gates on that distributor's distribution network.

Q10: Do submitters have any comments on GIEP27?

GIEP28

GIEP28 relates to rules 48.2.2(b), 49.2.2(b), 50.2.2(b) and 51. Under these rules the allocation agent must provide reports to each retailer setting out the gas gate residual profile in GJ at a gas gate for the relevant consumption period by:

- 0800 hours on the 5th business day of each month in relation to initial allocations (see rule 48.2);
- 0800 hours on the 11th business day of each month in relation to interim allocations (see rule 49.2);
- 0800 hours on the 16th business day of each month, in relation to final allocations (see rule 50.2); and
- If requested by Gas Industry Co in accordance with rule 51 in relation to special allocations.

The gas gate residual profile is expressed in the proposed File Format as both a percentage and in GJ following feedback from industry participants.

The proposed File Formats include the provision of the information in these reports to all allocation participants (not just retailers). This is because rule 53.1 requires the publication of the seasonal adjustment daily shape values, which includes the gas gate residual profile.

Q11: Do submitters have any comments on GIEP28?

GIEP29

GIEP29 relates to rule 53.1. Under rule 53.1 the allocation agent must publish the seasonal adjustment daily shape values for every gas gate by 1200 hours on the 1st business day of each month. The seasonal adjustment daily shape values means the total gas consumption (expressed as daily GJ values) for each gas gate and is derived from each gas gate residual profile for all retailers at that gas gate for the previous 24 months in which allocations have been performed.

GIEP29 allows for direct provision of this information to allocation participants in addition to publication on the allocation agent's website.

Q12: Do submitters have any comments on GIEP29?

GIEP30

GIEP30 relates to rule 53.3. Under rule 53.3 the allocation agent must provide by 1200 hours on the 5th business day of each month (in respect of each consumption period for which a final allocation has been performed in the previous 12-months) a report for each gas gate to retailers and the industry body on the percentage of error in the accuracy between the aggregated consumption information for consumer installations in allocation groups 3 to 6 provided for initial allocation and provided for final allocation.

As noted in the 'general comments' on the proposed File Formats, Gas Industry Co also intends for this report to also be made available to distributors in relation to gas gates on that distributor's distribution network.

The proposed File Format covers the format for the exchange of this information between the allocation agent and allocation participants. Gas Industry Co may negotiate with the allocation agent for this information to be provided in a different format to Gas Industry Co.

Q13: Do submitters have any comments on GIEP30?

GIEP31

GIEP31 relates to rule 53.2. Under rule 53.2. the allocation agent must publish in respect of each gas gate, by 0800 hours on the last business day of each month, the following reports for each initial allocation, interim allocation, final allocation or special allocation performed in that month for the relevant consumption periods:

- the sum of the actual daily energy quantities injected at each gas gate;

- the sum of the quantities of gas allocated to each retailer in the previous month;
- the total amount of, and percentage of, UFG at each gas gate for the previous month and previous 12 months.

In addition to publishing this information, industry participants requested the direct supply of the information and requested that the report include information on the rolling 12 month UFG% at each gas gate. Gas Industry Co acknowledges that these arrangements can be made directly with the allocation agent, however, at the time of releasing this consultation paper, a decision has not been made on whether a file format for a rolling 12 month UFG % will be necessary (i.e. for incorporation into GIEP31).

As noted in the 'general comments' on the proposed File Formats, Gas Industry Co also intends for this report to also be made available to distributors in relation to gas gates on that distributor's distribution network.

Q14: Do submitters have any comments on GIEP31?

4

Other matters for Consultation (submissions due Friday, 11 July 2008)

As noted above, Gas Industry Co seeks submissions on the matters discussed in this Part of the paper by Friday, 11 July 2008. The matters presented in this section include:

- the proposed percentage of accuracy to be determined under rule 37.3;
- the proposed groups of gas gates to be treated as single gas gates for the purpose of the Reconciliation Rules (i.e. the notional delivery points);
- the proposed information requirements for information from transmission system owners (including the proposed timing requirements to be notified under rule 42);
- a discussion on additional information exchanges, including:
 - additional information and reports that allocation participants may request the allocation agent to provide;
 - information exchanges from the allocation agent to transmission system owners (in particular those required for upstream balancing); and
 - notifications to the allocation agent; and
- a discussion on “gas measurement systems” and the definition of “gas gate”.

Proposed percentage of error – consumption information

Rule 37.3 of the Reconciliation Rules requires Gas Industry Co to determine and publish a percentage of error for the accuracy of the consumption information provided for initial allocation (when compared against consumption information provided for final allocation).

The development of an appropriate percentage of accuracy has a fairly lengthy history. The issue was first raised by Gas Industry Co in a reconciliation discussion paper released in January 2007. That paper proposed that in relation to non-TOU meters, criteria should be established that would compare the accuracy of data provided for the initial month end allocation against the data provided for the

final allocation 12 months later. It was suggested that the initial allocation data be required to be within +/- 2% of the final allocation data.

The submissions received in response to that paper on the accuracy criteria issue were concerned that the proposed accuracy threshold of +/-2% was too narrow, especially when a rolling 3 month basis was used. It was suggested there may have been some confusion about the +/-2% threshold specified in the Reconciliation Code. It was further suggested that comparing 12 months data would remove the impact of seasonality in the consumption data.

After considering the submissions received, Gas Industry Co in the Statement of Proposal paper on downstream allocation and reconciliation it released on 1 September 2007 (the "Statement of Proposal") stated (see paragraphs 8.31 to 8.33 of that paper):

For allocation groups 5 and 6, retailers will be required to provide a forward estimate of consumption for those customers where an actual meter reading has not been obtained (and therefore the calculation of an historic estimate is not possible). While the forward estimation methodology has not been specified in the draft rules, retailers will be required to ensure that the accuracy of the information provided to the allocation agent for the initial and final allocations falls within the accuracy range specified and published, from time to time, by Gas Industry Co.

Gas Industry Co considers that the requirement to meet an estimation accuracy target, as well as the ability to audit a retailer's forward estimation methodology if concerns are raised, is sufficient to improve accuracy of consumption information at this time without mandating a forward estimation methodology.

While there was general agreement to the accuracy target approach, submitters were concerned that the proposed estimation accuracy range of +/-2% would be too "tight" on a rolling 3 month basis. It is therefore proposed that the initial accuracy range be set at +/- 15% which will be reviewed by Gas Industry Co from time to time to ensure that it is providing the right incentive to retailers to ensure they are using an accurate forward estimate methodology.

Submissions in response to the Statement of Proposal did not suggest changes to the proposed +/- 15% threshold. However, general feedback suggested that Gas Industry Co should include further constraints in the rules in relation to matters Gas Industry Co must consider, and the processes that Gas Industry Co should follow, in making delegated decisions under the rules. These comments led to Gas Industry Co including in the proposed rules a number of matters that Gas Industry Co must have regard to when setting the percentage of accuracy and the need for Gas Industry Co to consult with allocation participants on this measure.

Accordingly, the relevant Reconciliation Rule states:

37. Accuracy of consumption information for initial allocation

37.1.1 This rule applies to consumption information at a **gas gate** provided to the **allocation agent** for **consumer installations** in **allocation groups** 3 to 6 in respect of a **consumption period**.

37.1.2 For a **consumption period**, the accuracy of the consumption information provided by a **retailer** under rule 31 for **initial allocation** must, when compared with the consumption information provided by that retailer under rule 33 for **final allocation**, fall within the percentage of error determined and **published** by the **industry body** under rule 37.3.

37.1.3 Prior to the beginning of each **gas year**, the **industry body** must, after consulting with **allocation participants**, determine and **publish** the percentage of error for the accuracy of the consumption information provided for **initial allocation** to be applied to the **consumption periods** in the following **gas year** in accordance with rule 37.2.

37.1.4 In making its determination under rule 37.3, the **industry body** must have regard to the following matters:

- (a) The primary aim of ensuring consumption information provided for **initial allocation** is as accurate as possible when compared with consumption information provided for **final allocation**;
- (b) The extent to which **retailers** are able to comply with the percentage of error for the accuracy of consumption information provided for **initial allocation**;
- (c) Any expected costs that would be reasonably incurred by **retailers** to achieve compliance with the percentage of error for the accuracy of consumption information provided for **initial allocation**; and

37.1.5 Any other matter it considers relevant to its determination.

Gas Industry Co has performed an initial assessment of the matters specified in rule 37.4 and considers that it would be appropriate for Gas Industry Co to determine under rule 37.3 a percentage of error for the accuracy of consumption information of 15% (i.e. +/- 15%) for the gas year commencing 1 October 2008.

In proposing a determination of +/- 15% Gas Industry Co considers:

- A +/- 15% measure sufficiently achieves the aim of ensuring consumption information provided for initial allocation is as accurate as possible when compared with consumption information provided for final allocation. Gas Industry Co acknowledges that this is the primary aim of the accuracy percentage and believes, for this first gas year, a +/- 15% measure will materially achieve that aim. Gas Industry Co appreciates that in relation to the consumer installations covered by the accuracy measure (allocation groups 3 to 6) there can be large seasonal fluctuations that can be difficult to estimate (for example, gas demand for heating purposes during unseasonal weather), which make it difficult to accurately estimate consumption.
- Retailers are not required under industry arrangements to meet any accuracy percentage or required to provide revised allocation information. The introduction of the final allocation process and the introduction of any accuracy measure (even if arguably a generous measure) will together bring benefits to the industry (in terms of improved allocation practices) and consumers. Given this is the first gas year of the Reconciliation Rules application, it is unlikely that the consumption information initially provided by retailers will be at the level of accuracy that may be sought once the Reconciliation Rules have been in force for a length of time. Gas Industry Co acknowledges that a more liberal accuracy percentage in the first year of the Reconciliation Rules application is likely to be appropriate so as to not place unreasonable initial compliance expectations on retailers.
- The introduction of an accuracy measure will likely result in compliance costs for retailers. Some retailers have informally advised Gas Industry Co that they would not currently meet a 15% measure but consider it reasonably practicable to materially achieve this measure by 1 October 2008. There appears to be industry concern from allocation participants that it would not be practicable to comply with a tighter accuracy percentage at the go-live date. If a stricter accuracy percentage was initially applied (e.g. +/- 5%), Gas Industry Co understand that large and perhaps undue compliance costs would be incurred by retailers to achieve compliance with that percentage, Gas Industry Co notes it currently only has anecdotal knowledge of such costs, and seeks such information from industry participants for the purpose of this consultation.
- A 15% measure was initially proposed in September 2007 in the Statement of Proposal paper. Gas Industry Co understands that retailers have been considering their systems and necessary improvements in reliance on this measure being adopted for the gas year commencing 1 October 2008.

Over time it is hoped that estimation practices may improve. For example, widespread roll out of smart meters would significantly improve allocation information. Accordingly, it is hoped that, in the future, a narrower accuracy percentage may be appropriate.

While a determination of +/- 15% is proposed for the purposes of this consultation, Gas Industry Co is also particularly interested in any comments on the effects and benefits of a determined percentage of error of anywhere between the range of +/- 10% to +/- 20%. These submissions will help enable Gas Industry Co to consider the merits of determining a percentage of error should the submissions indicate a +/- 15% measure is not appropriate.

Q15: Do submitters agree with the +/- 15% percentage of error that Gas Industry Co proposes to determine under rule 37.3? If not, please explain why and please propose a different percentage of error with supporting information and reasons.

Q16: Do submitters have any general comments to note on the choice of a percentage of error between +/- 10% and +/- 20%?

Q17: Do submitters have any comments or information in relation to the following matters that Gas Industry Co must have regard to when determining an appropriate percentage of error?

- The primary aim of ensuring consumption information provided for initial allocation is as accurate as possible when compared with consumption information provided for final allocation.*

- The extent to which retailers are able to comply with the percentage of error for the accuracy of consumption information provided for initial allocation.*

- Any expected costs that would be reasonably incurred by retailers to achieve compliance with the percentage of error for the accuracy of consumption information provided for initial allocation.*

- Any other matters relevant to Gas Industry Co's determination.*

Consultation on the proposed groupings of gas gates

The current industry arrangements for downstream allocation and reconciliation (through the industry agreed 'Reconciliation Code') only provide for allocation at shared gas gates. Whereas the Reconciliation Rules, go further and apply to all downstream gas gates.

A "gas gate" is defined in rule 5 as:

gas gate means the point of connection between -

- (a) a transmission system and a distribution system; or
- (b) a transmission system and a consumer installation; or
- (c) two gas distribution systems; or
- (d) a group of gas gates, as determined and published by the industry body, treated as a single gas gate for the purposes of these rules.

Gas Industry Co has also considered issues relevant to the definition of gate in the development of the Switching Determinations.

For the purposes of reconciliation, Gas Industry Co considers that the gas gate codes will be as determined in the final published Switching Determination and that the following groups of gas gates should be treated as single gas gates for the purposes of the Reconciliation Rules:

Grouped gas gate (i.e. Notional Delivery Point)	Code	Notes
Greater Auckland	GTA03610	Comprises the following Gas Gates: Bruce McClaren (BMC17901), Henderson (HEN74101), Papakura (PAP06610) and Westfield (WST03610).
Greater Hamilton	GTH11301	Comprises the following Gas Gates: Hamilton Te Kowhai (HTK08301) and Hamilton Temple View (HTV11301)
Greater Mt Maunganui	GMM08001	Comprises the following Gas Gates: Mt Maunganui (MMU08001) and Papamoa (PPA33201)
Greater Tauranga	GTT07701	Comprises the following Gas Gates: Pyes Pa (PYE36601) and Tauranga (TRG07701)

These grouped gas gates (commonly referred to by the industry as Notional Delivery Points) will not form gas gates for the purposes of the Gas (Switching Arrangements) Rules 2008, but will be recognised as gas gates for the purposes of the Reconciliation Rules. This means that while individual ICPs will be required to be assigned to a specific gas gate within the registry, allocations will be performed at the “grouped gas gate” i.e. Notional Delivery Point level.

Gas Industry Co welcomes feedback on the four ‘groups’ identified above and whether additional groups of gas gates need to be considered for the purposes of the Reconciliation Rules as a single gas gate.

Another issue in relation to the gas gate definition is discussed under the heading “A discussion on “gas measurement systems” and the definition of “gas gates” ” below.

Q18: Do submitters have any comments on the proposed groupings of gas gates for the purposes of the Reconciliation Rules? Are there any other gas gates that need to be considered as a group for the purposes of the Reconciliation Rules?

Q19: Gas Industry Co notes that the application of the Reconciliation Rules is not limited to shared gas gates. Are there any gas gates that should validly be exempt from the rules? If so, why?

Information from transmission system owners

The Reconciliation Rules specify certain transmission system owner obligations as noted below:

41. Provision of daily injection information

Every **transmission system owner** must provide to the **allocation agent** by 0800 hours on the 4th **business day** of the month that immediately follows a **consumption period** the actual daily energy quantities injected at each gas gate connected to its transmission system for that **consumption period**.

42. Publication of estimated day-end volume injection quantities each day

By 1000 hours each day and at any other time on that day as required and notified by the **industry body**, for each **gas gate** connected to its transmission system, a **transmission system owner** must give notice to each **retailer** receiving gas at a particular **gas gate** of the estimated daily energy quantities that were injected on the previous day at that **gas gate**.

Under rule 42, Gas Industry Co can notify another time each day (in addition to 1000 hours) for estimated day-end volume injection quantities to be notified. The rule states that the first notification must occur by 1000 hours each day, as this will assist 'shippers' (ie retailers) to calculate their intraday nominations. It was envisaged the second provision would be later in the day and would essentially confirm the accuracy of the earlier information exchange.

These injection quantities are referred to as "estimates" as the transmission system owner may be yet to complete its verification process, but in reality Gas Industry Co expects the estimate provided later in the day would usually be the actual injection quantity to be provided under rule 41 later in time.

Gas Industry Co proposes that the second provision of estimated injection information should be made available at 4pm (1600 hours). However, submitters should identify if they prefer an alternative time of the day and provide their reasoning. Submitters should also indicate if this subsequent 'confirmation' of the injection quantities is not of any value.

Gas Industry Co has not developed a file format for the information required in rules 41 and 42 at this time. This is because Gas Industry Co understands that the largest transmission system owner affected by this rule (Vector Transmission) is restrained by its current systems in relation to the formats in which information can be provided. Accordingly, it is more efficient for transmission system owners to detail how they wish to format this information.

To this end, Gas Industry Co reminds transmission system owners of their requirements under the rules and asks each transmission system owner to identify how it intends to provide the information specified in rules 41 and 42. In particular, in relation to:

- Vector Transmission, Gas Industry Co expects to receive a request for the allocation agent and retailers to obtain certain of the information required in rules 41 and 42 from OATIS and expects Vector Transmission to detail its proposal for providing any of the matters required by the rules but not currently available on OATIS. For example, retailers have advised that Vector Transmission needs to put forward additional measures for complying with the requirements in rule 42 as apparently this information is not available on OATIS. Gas Industry Co also seeks formal confirmation from

Vector Transmission that it will provide the appointed allocation agent with all access rights required to access the necessary information, will on request provide the appointed allocation agent with information on the format of the files that will be generated from OATIS and, if necessary, training on how to use OATIS.

- any gas gates that are not operated by Vector Transmission, a response from the relevant 'transmission system owner' (or a "distributor" where applicable") regarding their intended process and format for the provision of the above information. For example, Gas Industry Co expects the list of gas gates will include the network interconnection point at Waitoki B (WTK33902) which is not recognised by Vector Transmission and does not appear in OATIS.

Q20: Transmission system owners are asked to provide their views on the discussion regarding the implementation of rules 41 and 42 and respond to the questions asked above of them?

Q21: Do submitters have any views of Gas Industry Co's proposed timing for the provision of estimated day-end volume injection quantities each day (i.e. 10am and 4pm) or any other comments on the proposed implementation of rules 41 and 42?

Additional information exchanges

In addition to the information exchanges noted above, there are a number of other reports and information exchanges associated with downstream allocation and reconciliation. Specifically:

- exchanges between the allocation agent and the allocation participants. This Part of the paper discusses the request by some allocation participants to have the ability to request the allocation agent to prepare and provide additional reports and information to them subject to payment on a time and materials basis. (Also, as noted in Part 3 of the paper, Gas Industry Co has included the requirement for certain information to be provided directly to allocation participants by the allocation agent, in addition to the requirement for the information to be published under rule 53.)
- information exchanges between the allocation agent and the transmission system owner (in particular information exchanges required for upstream balancing);
- the mechanism for an allocation participant to notify the allocation agent of changes.

Gas Industry Co has considered these additional measures. The approach suggested by Gas Industry Co depends on the nature of the information exchange. In particular:

- As noted in Part 3, the proposed File Formats include some information exchanges from the allocation agent to allocation participants in addition to the allocation participant to allocation agent exchanges envisaged by rule 25. The proposed File Formats for these exchanges largely mirror the requirements in the rules, except that the rules only require publication of the information by the allocation agent (and the proposed File Formats require the allocation agent to provide this information directly to allocation participants). This direct provision has been included in response to industry requests and the supply and timeframes for such direct provision will be negotiated by Gas Industry Co as part of the service provider agreement negotiations with the appointed allocation agent.

- There are other reports and information exchanges that are not contemplated by the Reconciliation Rules but Gas Industry Co recognises that it is efficient for the allocation agent to be involved. In these instances, Gas Industry Co's suggested approach is to negotiate provisions in the allocation agent service provider agreement that address the necessary requirements. These reports primarily concern additional exchanges between the allocation agent and allocation participants and exchanges between the allocation agent and transmission system owner. The precise terms and conditions of these information exchanges will not be resolved until the allocation agent service provider agreement is signed, however the scope of the provisions Gas Industry Co will seek to negotiate are presented for industry feedback.
- Gas Industry Co considers that it, in conjunction with the appointed allocation agent, should develop a notification form for allocation participants to complete to advise the allocation agent of changes. The contents of this form are discussed and feedback welcomed.

Provision of reports and information by the allocation agent to allocation participants

Distributors requested that the allocation agent provide them with certain allocation and UFG information (initial and revised) in respect of the gas gates on the distributor's distribution network that are contestable (ie where more than one retailer trades). The current allocation agent provides this information in response to the format (eg txt file, excel file etc) requested by the distributor and with the details and level of aggregation requested by the relevant retailer (e.g. one distributor receives a report where consumption is stated in kWh report and another in GJ).

As noted above, Gas Industry Co proposed to make GIEP 24, GIEP 27, GIEP30 and GIEP 31 available to distributors in respect of the gas gates on the distributor's distribution network. That said, distributors (and indeed other allocation participants) may from time to time wish to arrange with the allocation agent the preparation of a unique format for the presentation of information provided under these rules or a special report.

Accordingly, but subject to industry views, Gas Industry Co envisages negotiating in the allocation agent service provider agreement that the allocation agent may need to provide:

- distributors with reports or information in relation to the distributor's gas gates;
- other allocation participants with reports or information in respect to information that is provided from or to them (but in different formats) under the rules, provided the allocation agent only charges those allocation participants its standard rates agreed with Gas Industry Co and keeps Gas Industry Co informed of all reports it is being asked to provide.

Gas Industry Co considers it is appropriate that allocation participants requesting special reports pay directly for the time taken by the allocation agent to structure these reports according to their particular requirements and, accordingly, expects the allocation agent will invoice the applicable allocation participant for this service.

Q22: Do submitters have any comments on the proposed ability for the allocation agent to be able to supply special reports and information to allocation participants? Or comments on Gas Industry Co's proposal to provide for this in the allocation agent service provider agreement?

Provision of information by the allocation agent to transmission system owner

Information provided by the transmission system owner to the allocation agent is discussed above. The focus here is on information that Vector Transmission requires on downstream allocations for the purpose of upstream balancing.

Dummy files for this information are attached in Appendix D. Gas Industry Co will negotiate as part of the allocation agent service provider agreement a requirement for the allocation agent to upload this information directly to OATIS. The intention is that the allocation agent will be required to submit information in accordance with the formats and codes recognised by OATIS. Vector Transmission has agreed informally to give the allocation agent the necessary access rights to submit this information, and Gas Industry Co has asked for formal acknowledgement in this paper (see above).

OATIS has strict information format requirements and Gas Industry Co understands the compliance costs of amending OATIS' format requirements would be very inefficient. Accordingly, it is appropriate for the allocation agent to submit information in accordance with the OATIS formats and codes, rather than any different formats or codes determined in relation to downstream allocation and reconciliation. This process may require the allocation agent to exclude certain gas gates or change allocation participant codes when making submissions to OATIS.

The provision of this information raises one interesting issue. OATIS requires that the submission identifies the 'contract code' for the gas supplied. This contract code information is not provided to the allocation agent under the Reconciliation Rules and is often not held on the reconciliation systems of retailers. Gas Industry Co understands there is no clear process for the provision of this information to the current allocation agent, but that the current allocation agent has attempted (usually successfully) to work out the correct contract code. Gas Industry Co considers the current process should be tightened.

Gas Industry Co discussed this issue with the GRREC on 6 June 2008 and considers the following process should be used to obtain this information:

- Following appointment of the allocation agent, Vector Transmission will provide the allocation agent with a complete list of all current and active contract codes.
- Each retailer's Transmission Services Agreement code shall be used by the allocation agent as the default code, unless a retailer makes it plain to the allocation agent to use one of its supplementary codes.

- Retailers shall advise the allocation agent using the notification form (see discussion on this form below) when to use a supplementary code (e.g. what the code is, the date it becomes effective, and the consumption to be allocated to the code e.g. certain ICP numbers or certain gas gate codes).
- The allocation agent will be able to sanity check the retailer's notification through checking the validity of the proposed code on OATIS. Vector usually includes a description of the code (eg dairy factory) which will assist determination of the application of the code, but Vector itself does not hold all of the necessary information (for example, Vector does not hold any information on the applicable ICP numbers).
- If a retailer does not advise the allocation agent of the supplementary code or incorrectly advises the allocation agent, this may result in the allocation agent's submission to OATIS being rejected or a correction needing to be made.

The intention at present is to ensure the allocation agent service provider agreement allows the allocation agent to contract directly with the relevant retailer for the allocation agent's time spent making any resubmission to OATIS using the correct codes or tracking down the causes of a rejected submission).

Gas Industry Co understands that there are usually less than 20 supplementary contract codes issued each year and accordingly the process above is a suitable means for processing such codes. For such a limited number of changes to codes, it is not necessary or efficient to build a more automated system – particularly considering the system constraints (on all sides) of providing the necessary information.

Except in the event of changes to the supplementary contract codes not being properly communicated to the allocation agent, the provision of the submission information to the transmission system owner is considered part of the allocation agent's general services and the allocation agent's costs will be treated as part of the on-going allocation costs. Vector Transmission will not be invoiced by the allocation agent for the provision of this information.

Gas Industry Co will monitor this situation and, in the longer term, may look to include a more detailed process in the Reconciliation Rules.

The allocation agent will need to submit initial allocation results into OATIS and later submit interim, final and special allocation results (if any) as corrections into OATIS. The file formats for corrections to OATIS is the same as that specified in Appendix B.

Q23: Do submitters have any comments on the provision of allocation information by the allocation agent to OATIS, including any comments on the dummy files attached as Appendix D?

Q24: Do submitters have any comments on the proposed process by which the allocation agent should be advised by retailers of changes to Vector's supplementary contract codes?

Notifications to the allocation agent

Gas Industry Co wishes to develop a standard form that allocation participants should use to notify the allocation agent. Such standard notifications could have very broad scope, including:

- a retailer giving notice under rule 39 of the rules that it is commencing or has ceased trading at a gas gate;
- an allocation participant advising the allocation agent of changes to its contact details (eg personnel changes in the reconciliation team);
- a retailer advising changes to 'supplementary contract codes' that the allocation agent should use in its submission to OATIS; and
- a retailer requesting review of a registered deemed profile under rule 59 or challenging a profile under rule 60.

Gas Industry Co's current intention is that a notification form should be made available by the allocation agent on its website, and could be manually filled in and provided to the allocation agent to notify changes. The nature of the form (eg pdf to be printed and emailed to the allocation agent or online form) will need to be determined in conjunction with the allocation agent given their system constraints.

Gas Industry Co will seek to negotiate in the allocation agent service provider agreement that the receipt of any such notifications are acknowledged by the allocation agent within two business days and at that time the allocation agent will also advise if and when the appropriate requests have been or will be processed, when the requests/changes will take or have taken effect or details the next steps that will occur in relation to the notification.

Gas Industry Co has not prepared a draft of the notification form at this time and anticipates that this will be developed in conjunction with the appointed allocation agent. However, Gas Industry Co anticipates that the form would include:

- A purpose statement, describing when and how the form should be used. For example "This form shall be used by allocation participants when notifying the allocation agent of any changes any arrangements that affect the allocation agent, including...".
- Details of how allocation agents should submit the form and how it will be processed.
- Fields for the allocation participant to complete to explain the notification, including the allocation participant's name, the contact name and details of the person to contact at the allocation participant, the details of notification (e.g. the proposed change, challenge, request or other notice). To ease administration time, allocation participants will be encouraged to be as specific as possible in detailing the notification (for example, in relation to supplementary contract codes to be used in OATIS, a retailer should list the date the change takes effect, the relevant gas gates and gas gate codes, the OATIS supplementary code and the ICPs or gas gates whose consumption should be recorded against the new supplementary code).

- The effective date(s) for the change. This may be open ended (i.e. until further notice) or for a defined period of time.

Once the form is available, Gas Industry Co anticipates that the allocation agent will ask all retailers to use the form to notify it of all gas gates at which allocation participants anticipate trading as at the go-live date.

Q25: Do submitters have any comments on the proposed notification form and process?

A discussion on “gas measurement systems” and the definition of “gas gate”

One industry participant has raised a concern they have regarding the definition of gas gate in the Reconciliation Rules, in particular related to the inclusion of a point of connection between two gas distribution systems. This industry participant is concerned that this could be interpreted as a connection between a distribution system (owned by one person) and a gas measurement system (owned by a different person).

It was not Gas Industry Co’s intention for such connections to be considered gas gates, and Gas Industry Co is currently considering whether the issue is legitimate and requires additional action, such as the use of transitional exemptions in the short term or a rule change in the longer term. To assist that consideration, Gas Industry Co would appreciate receiving the following information from industry participants:

- An estimate of the number of third party GMS connections;
- An estimate of the number (if any) of instances where a third party owns the meter, but not the whole GMS; and
- Any other information from participants where they have previously considered the issue of GMS or meter ownership in the context of the Gas Act definition of ‘distribution system’.

Following receipt of the information above and further consideration of the issue, Gas Industry Co can assess whether further action is necessary.

Q26: Do submitters have any comments on the definition of “gas measurement system” in the context of the definition of “gas gate”?

Q27: To assist Gas Industry Co’s analysis, Gas Industry Co request industry participants provide information relevant to the following:

- *An estimate of the number of third party gas measurement system connections;*

- *An estimate of the number (if any) of instances where a third party owns the meter, but not the whole gas measurement systems; and*
- *Any other information from participants where they have previously considered the issue of gas measurement systems or meter ownership in the context of the Gas Act definition of 'distribution system'.*

5

Other Implementation matters

There are a number of other implementation matters which need to occur prior to the go-live date of the Reconciliation Rules. Given the short timeframes, for completeness, the requirements which Gas Industry Co and the allocation agent need to implement and the process for implementation are presented in the table below.

Rule	Subject of Determination	Consultation Required in Rules	Process
Rule 5 (definition of gas gate)	Groups of gas gates to be treated as a single gas gate for purposes of downstream reconciliation.	No	This paper seeks formal comment on Gas Industry Co's proposed groupings of gas gates for downstream allocation and reconciliation.
Rule 7	Appointment of allocation agent	No	RFP released on 9 April 2008. Proposals that were received are currently being evaluated. Industry representatives are involved in the evaluation of proposals. Following the evaluation process (and identification of the preferred service provider), Gas Industry Co will negotiate service provider agreement.
Rule 8	Publication of allocation agent service provider agreement	No	Following appointment of allocation agent (see above), Gas Industry Co will publish the agreement on its website. Gas Industry Co is aiming to publish this agreement by mid-August 2008.
Rule 9	Allocation agent website	Yes (with Gas Industry Co)	Allocation agent must consult with Gas Industry Co in development of its website and website must be available by go-live date.
Rule 16	Determination and notification of on-going costs	No	Gas Industry Co will determine, publish and notify retailers of the breakdown of the estimated ongoing allocation costs for the gas year commencing on 1 October 2008. This must occur as soon as practicable and no later than 10 business days before the go-live date. Gas Industry Co anticipates this will occur early September 2008.
Rules 19, 20 and 81	Exemptions (standard, urgent and transitional)	Usually (with persons likely to be substantially affected)	Gas Industry Co may be asked to consider requests for exemptions during the implementation phase. Advice on likely exemption requests will be separately sought by Gas Industry Co.

Rule 25	Information exchange file formats	Yes (with allocation participants)	This paper seeks comment on the proposed information exchange file formats. A two week period has been allowed for consultation, as a comprehensive draft of the file formats has been available for industry comment since mid-April.
Rule 37.3	Accuracy requirements	Yes (with allocation participants)	Prior to the beginning of each gas year, Gas Industry Co must, after consulting with allocation participants and having regard to the matters specified in rule 37.4, determine and publish the percentage of error for the accuracy of the consumption information provided for initial allocation to be applied to the consumption periods in the following gas year. This paper seeks comment on the proposed accuracy measure to apply for the gas year commencing 1 October 2008.
Rule 42	Notification of timing of information from TSO	No	This paper seeks comment on Gas Industry Co's proposed timing for this information requirement.
Rules 55-64	Approval and registration of deemed profiles	Not usually.	Allocation agent may receive requests during the implementation phase for the registration of profiles.
Rule 61	Guidelines for determinations on profiles	Yes (with allocation participants)	As soon as practicable after this rule comes into force, Gas Industry Co is to develop (after consultation with allocation participants) and publish guidelines to assist the determination of whether a static deemed profile or dynamic deemed profile is, or continues to be, a reasonable representation of the actual consumption profile of the consumer installation or class of consumer installations to which it applies. Gas Industry Co is considering the steps required and anticipates publishing these guidelines by the end of the calendar year.
Rule 64	Guidance material for disputing profiles	No	Gas Industry Co intends to draft guidance material on issues related to disputing profiles. Gas Industry Co's target dates for the development of this material will be set once firm plans are in place for the required steps, and subject to resource availability.
Rule 65, 66 and 80	Guidance material on the triggering of compliance regime and event audits	No	Although not technically required under the Reconciliation Rules, Gas Industry Co intends to draft guidance material on the triggering of the compliance regime and event audits. Gas Industry Co's target dates for the development of this material will be set once firm plans are in place for the required steps, and subject to resource availability.
Rule 78	Provision of information during transitional period	No	Allocation agent may give notice to retailers and transmission system owner requiring it to provide consumption or injection information for a particular gas gate for the 12-months ending 30 September 2007 or ending 30 September 2008. Allocation participants must comply with a notice issued under

			this rule within 10 business days of receiving such notice. Gas Industry Co recommends that retailers and transmission system owners, prepare this information for provision prior to receiving the request to ensure that they are able to comply with the 10 day timeframe.
Rule 79	Calculation of annual UFG factors during transitional period	No	Allocation agent to calculate annual UFG factors to apply from 1 October 2008 in accordance with rule 79. A timeframe and likely process for this will be made available following the appointment of the allocation agent.

The implementation matters above focus on implementation issues identified in the rules. Gas Industry Co appreciates that allocation participants face further implementation issues. For example, making changes to their systems to comply with the File Formats, preparing for interim and final allocations and considering the commercial ramifications of those allocations.

One major implementation issue for allocation participants concerns the migration from the current allocation arrangements to the arrangements provided under the Reconciliation Rules. This migration path needs to be considered regardless of who is appointed as the allocation agent for the new regime. "Wash ups" of allocation information for consumption prior to 1 October 2008 will likely continue for some time after the implementation of the arrangements specified in the Reconciliation Rules. This means for some time allocation participants could be simultaneously working in two paradigms.

It has been suggested that Gas Industry Co could play a lead role in the transition from the industry agreed arrangements to the rule based arrangements. Gas Industry Co is not a party to the current industry arrangements. However, Gas Industry Co would be happy to consider the practicalities of any tasks the industry can agree it would like Gas Industry Co to perform on its behalf.

Q28: Do submitters have any comments on any of the other implementation matters detailed in Part 4 of the paper?

Q29: Do submitters have any comments on the migration from the current industry arrangements to the allocation arrangements provided under the Reconciliation Rules?

6

Submission Requirements

Gas Industry Co invites submissions on the issues detailed in this paper. Specific matters on which submissions are sought are set out in the body of the paper, and a suggested format for submissions is set out in the template in Appendix A.

The closing time for submissions is:

- On the proposed File Formats, 1700 hours on Friday, 27 June 2008; and
- On the other issues presented for consultation, 1700 hours on Friday, 11 July 2008.

Please note that submissions received after this date may not be able to be considered.

Gas Industry Co's preference is to receive submissions in electronic form (Microsoft Word format or PDF). The electronic version should be emailed with the phrase "Submission on Proposed Determinations and Notifications under Gas (Downstream Reconciliation) Rules 2008 and other implementation matters" in the subject header to submissions@gasindustry.co.nz.

Gas Industry Co will acknowledge receipt of all submissions electronically. Please contact Jay Jefferies (Ph: +64 4 472 1800 or Email: jay.jefferies@gasindustry.co.nz), if you do not receive electronic acknowledgement of your submission within two business days.

Gas Industry Co values openness and transparency and therefore submissions will generally be made available to the public on Gas Industry Co's website. Submitters should discuss any intended provision of confidential information with Gas Industry Co prior to submitting the information.

Following receipt of submissions, Gas Industry Co will revise the proposed Notifications and Determinations as appropriate and intends to issue them in final form by posting them on the Gas Industry Co website. Gas Industry Co will also take into account submissions received on the other matters in the paper when negotiating the allocation agent service provider agreement, finalising the notification form in conjunction with the appointed allocation agent and considering its implementation programme for the Reconciliation Rules.

Appendix A Recommended Format for Submissions

To assist the Gas Industry Co in the orderly and efficient consideration of stakeholders' responses, a suggested format for submissions has been prepared. This is drawn from the questions posed in the body of this Consultation Paper. Submitters are also free to include other material on the proposed Determinations in their responses.

Consultation on the proposed File Formats (submissions due Friday, 27 June 2008)

Submission prepared by:..... (company name and contact)

Question	Comment
Q1: Do submitters have any general comments on the proposed File Formats, including any comments on the general issues considered by the IEFWWG and Gas Industry Co in the development of the proposed File Formats? Are there any additional File Formats that submitters consider are required?	
Q2: Do submitters have any comment on GIEP20, including the additional issues considered in the development of GIEP20?	
Q3: Do submitters have any comments on GIEP21?	
Q4: Do submitters have any comments on GIEP22?	
Q5: Do submitters have any comments on GIEP23 or the additional issues considered in the development on GIEP23?	
Q6: Do retailers prefer, from an operational perspective, the provision of meter reading frequency information annually or monthly?	
Q7: Do submitters have any comments on GIEP24?	

Question	Comment
Q8: Do submitters have any comments on GIEP25?	
Q9: Do submitters have any comments on GIEP26?	
Q10: Do submitters have any comments on GIEP27?	
Q11: Do submitters have any comments on GIEP28?	
Q12: Do submitters have any comments on GIEP29?	
Q13: Do submitters have any comments of GIEP30?	
Q14: Do submitters have any comments on GIEP31?	

Matters for Consultation by Friday, 11 July 2008

Submission prepared by:..... (company name and contact)

Question	Comment
Q15: Do submitters agree with the +/- 15% percentage of error that Gas Industry Co proposes to determine under rule 37.3? If not, please explain why and please propose a different percentage of error with supporting information and reasons.	
Q16: Do submitters have any general comments to note on the choice of a percentage of error between +/- 10% and +/- 20%?	
Q17: Do submitters have any comments or information in relation to the matters that Gas Industry Co must have regard to when determining an appropriate percentage of error?	

Question	Comment
Q18: Do submitters have any comments on the proposed grouping of gas gates for the purposes of the Reconciliation Rules? Are there any other gas gates that need to be considered as a group for the purposes of the Reconciliation Rules?	
Q19: Gas Industry Co notes that the application of the Reconciliation Rules is not limited to shared gas gates. Are there any gas gates that should be validly exempt from the rules? If so, why?	
Q20: Transmission owners are asked to provide their views on the discussion regarding the implementation of rules 41 and 42 and respond to the question asked above of them.	
Q21: Do submitters have any views of Gas Industry Co's proposed timing for the provision of estimated day-end volume injection quantities each day (ie 10am and 4pm) or any other comments on the proposed implementation of rules 41 and 42?	
Q22: Do submitters have any comments on the proposed ability for the allocation agent to be able to supply special reports and information to allocation participants? Or comments on Gas Industry Co's proposal to provide for this in the allocation agent service provider agreement?	
Q23: Do submitters have any comments on the provision of allocation information by the allocation agent to OATIS, including any comments on the dummy files attached as Appendix D?	
Q24: Do submitters have any comments on the proposed process by which the allocation agent should be advised by retailers of changes to Vector's supplementary contract codes?	

Question	Comment
Q25: Do submitters have any comments on the proposed notification form and process?	
Q26: Do submitters have any comments on the definition of "gas measurement system" in the context of the definition of "gas gate"?	
<p>Q27: To assist Gas Industry Co's analysis, Gas Industry Co request industry participants provide information relevant to the following:</p> <ul style="list-style-type: none"> • An estimate of the number of third party gas measurement system connections; • An estimate of the number (if any) of instances where a third party owns the meter, but not the whole gas measurement system; and • Any other information from participants where they have previously considered the issues of gas measurement systems or meter ownership in the context of the Gas Act definition of "distribution system". 	
Q28: Do submitters have any comments on any of the other implementation matters detailed in Part 4 of the paper?	
Q29: Do submitters have any comments on the migration from current industry arrangements to the allocation arrangements provided under the Reconciliation Rules?	

Appendix B Proposed File Formats

The proposed File Formats are attached to this Appendix.

The proposed File Formats use a number of 'placeholder' codes. Including:

RETA – for “a retailer”

SENA – for “the sender”; and

NETA – for “network code”.

As noted in the consultation paper, Gas Industry Co currently considers the codes for the proposed File Formats will be as specified in the Switching Determination (once published) plus the additional codes specified below:

- ALLA for allocation agent;
- APAR for all allocation participants; and
- additional gas gate codes to provide for the proposed groups of gas gates (i.e. notional delivery points as follows):
 - Greater Auckland, GTA03610 (Comprising Bruce McClaren (BMC17901), Henderson (HEN74101), Papakura (PAP06610) and Westfield (WST03610));
 - Greater Hamilton, GTH11301 (Comprising Hamilton Te Kowhai (HTK08301) and Hamilton Temple View (HTV11301));
 - Greater Mt Maunganui, GMM08001 (Comprising Mt Maunganui (MMU08001) and Papamoa (PPA33201)); and
 - Greater Tauranga, GTT07701 (Comprising Pyes Pa (PYE36601) and Tauranga (TRG07701)).

The Switching Determinations are yet to be finalised. However, for completeness, Gas Industry Co's current views on these codes are recorded in Appendix C.

File naming convention

In submitting information to the allocation agent in accordance with the proposed File Formats, the following file naming convention is to be used unless otherwise specified by Gas Industry Co:

Sender + Utility Type + Recipient + File Type + Month to which report/consumption applies+
Report Run Date + UniqueID# (e.g. hhmm run time, or ICP but limited to Char(60))

with an extension of .TXT and with the components concatenated using the underscore character, to assist readability:

e.g. RETA_G_ALLA_GRS-020_200810_20081105_1232.TXT

[Char4_Char1_Char4_ Char7_yyyymm_yyyymmdd_UniqueID.TXT]

The File Type portion of the file name (eg GRS-020) is defined as part of the file header definition in the proposed File Formats.

The first record of a file contains Header information followed by zero or more detail lines, as detailed in the attached File Formats.

RECONCILIATION SUBMISSION AND ALLOCATION FILE FORMATS IN ACCORDANCE WITH GAS (DOWNSTREAM RECONCILIATION RULES) 2008

Draft released for consultation

Date 9 June 2008

Version	Date	Comments
1	11 April 2008	IEFFWG Initial draft
2	9 June 2008	IEFFWG final draft (which incorporates industry feedback on initial draft), as endorsed by Gas Industry Co as the proposed File Format to be notified under rule 25 of the Reconciliation Rules.

GIEP20 Monthly Aggregated Allocation Submission Information – Allocation Groups 4 and 6

- Monthly aggregate estimated energy quantities by gas gate for all consumer installations in allocation groups 4 and 6
 - Rules: (GDRR 31.4 (Initial); GDRR 32.4 (Interim); GDRR 33.4 (Final))
- ICPs < 10TJ with TOU metering
 - Subject to alignment with the allocation group and profile recorded in the registry (once operational) for the ICP for the consumption period. ICPs with a TOU meter may be either:
 - If annual consumption > 250 GJ, submitted as actual daily quantities (ie submitted as allocation group 2); or
 - If annual consumption ≤ 250 GJ submitted as actual and/or estimated monthly quantities (ie submitted as allocation group 6).

ICPs in this category (250GJ < annual consumption for ICP with TOU meter ≤ 10TJ) must be submitted as daily data (ie as gas allocation group 2) in GIEP21 and must be excluded from allocation group 4 aggregated data reported using GIEP20.

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	Monthly Submission	GRS-020
Submission type	Char (1)	M	I – Initial Submission M – Interim Submission F – Final Submission S – Special Submission	I
Sender	Char (4)	M	Party code of sender	SENA
Sent on behalf of	Char (4)	M	Party code of party on whose behalf consumption data is provided	RETA
Recipient	Char (4)	M	Party code of Recipient	ALLA
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	2

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network code	Char (4)	M	Valid network code	NETA
Reconciliation Participant	Char (4)	M	Valid reconciliation code for participant	RETA
Profile Type	Char (3)	M	GRP is Gas Gate Residual	GRP
Allocation Group	Char (1)	M	Allocation Group	4
Consumption (GJ)	Num (8.3)	M	Consumption in GJ (Note = kWh x 0.0036)	445.050
Quantity of Historic Estimate in (GJ)	Num (8.3)	M	Consumption in GJ (Note= kWh x 0.0036)	123.754
Number of Installations	Num (8)	O	Number of installations making up the monthly aggregate volume (include each installation whether supplied for part or whole of consumption period)	85
Consumption Period	MM/YYYY	M	Calendar month to which consumption information applies	10/2008

**Example (monthly
allocation submission
groups 4 and 6:**

HDR, GRS-020,I,SENA,RETA,ALLA,02/11/2008,12:32:02,2
DET,TWA35610,NETA,RETA,GGR,4,445.050,123.754,85,10/2008
DET,TWA35610,NETA,RETA,GGR,6,1536.667,384.166,1002,10/2008

GIEP21 Daily Allocation Submission Information

Allocation Groups 1, 2 and 3

- Allocation Groups 1 and 2
 - Actual daily energy quantities for each consumer installation in allocation groups 1 and 2
 - Rules: (GDRR 31.1 (Initial); GDRR 32.1 (Interim); GDRR 33.1 (Final))
- Allocation Group 3 (Static Deemed Profile)
 - Estimated daily energy quantities for each consumer installation in allocation group 3
 - Rules: (GDRR 31.2 (Initial); GDRR 32.2 (Interim); GDRR 33.2 (Final))
- ICPs < 10TJ with TOU metering
 - Subject to alignment with the allocation group and profile recorded in the registry (once operational) for the ICP for the consumption period. ICPs with a TOU meter may be either:
 - If annual consumption > 250 GJ, submitted as actual daily quantities (ie submitted as allocation group 2); or
 - If annual consumption ≤ 250 GJ submitted as actual and/or estimated monthly quantities (ie submitted as allocation group 6).

ICPs in this category (250GJ < annual consumption for ICP with TOU meter ≤ 10TJ) must be submitted as daily data (ie as gas allocation group 2) in GIEP21 and must be excluded from allocation group 4 aggregated data reported using GIEP20.

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	Daily Submission	GRS-021
Submission type	Char (1)	M	I – Initial Submission M – Interim Submission F – Final Submission S – Special Submission	I
Sender	Char (4)	M	Party code of sender	SENA
Sent on behalf of	Char (4)	M	Party code of party on whose behalf consumption data is provided	RETA
Recipient	Char (4)	M	Party code of Recipient	ALLA
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	2

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
ICP	Char (15)	M	ICP unique identifier	012345678QT1234
Network Code	Char (4)	M	Valid network code	NETA
Reconciliation Participant	Char (4)		Valid reconciliation code for participant	RETA
Allocation Group	Char (2)	M	Allocation Group (1-3)	01
Profile type	Char (3)	M	TOU or SDP	TOU
Profile code	Char (6)	M/O	Mandatory where Profile Code is SDP (code as set by Allocation Agent when approving profile) otherwise null	A316
Customer Name	Char (50)	O	Customer Name	X Trading Ltd

Consumption Day	DD/MM/YYYY	M	Date of the Day to which consumption information applies	01/10/2008
Consumption (GJ)	Num (8.3)	M	GJ (= kWh x 0.0036)	759.025
Quantity of Historic Estimate in (GJ)	Num (8.3)	M/O	Consumption in GJ (= kWh x 0.0036); Mandatory for Allocation Group 3	123.754
Consumption Period	MM/YYYY	M	Calendar month to which the consumption information is being reported	10/2008

Example (daily allocation submission groups 1-3):

HDR, GRS-021,I,SENA,RETA,ALLA,02/11/2008,12:32:02,2
DET,TWA35610,012345678QT213,NETA,RETA,1,TOU,,X Trading Ltd,01/10/2008,759.025,,10/2008
DET,TWA35610,012345678QT213,NETA,RETA,1,TOU,,X Trading Ltd 02/10/2008,1314.756,,10/2008
Etc

GIEP22 Daily Allocation Submission Information Allocation Group 5

- Allocations Group 5 (Dynamic Deemed Profile)
 - Aggregate estimated daily energy quantities by Gas Gate by Profile
 - Includes number of installations
 - Rules: (GDRR 31.3 (Initial); GDRR 32.3 (Interim); GDRR 33.3 (Final))

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	Daily Allocation Submission Information	GRS-022
Submission type	Char (1)	M	I – Initial Submission M – Interim Submission F – Final Submission S – Special Submission	I
Sender	Char (4)	M	Party code of sender	SENA
Sent on behalf of	Char (4)	M	Party code of party on whose behalf consumption data is provided	RETA
Recipient	Char (4)	M	Party code of Recipient	ALLA
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	2

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
Reconciliation Participant	Char (4)		Valid reconciliation code for participant	RETA
Allocation Group	Char (2)	M	As per Reconciliation Code	5
Profile type	Char(3)	M	As per Reconciliation Code (DDP)	DDP
Profile code	Char (6)	M	Code as set by Allocation Agent when approving profile	D316
Consumption Day	DD/MM/YYYY	M	Date of the Day to which consumption information applies	01/10/2008
Consumption (GJ)	Num (8.3)	M	GJ (= kWh x 0.0036)	759.025
Quantity of Historic Estimate in (GJ)	Num (8.3)	M	Consumption in GJ (= kWh x 0.0036)	123.754
Number of Installations	Num (5)	M	Number of installations making up the daily aggregate volume	75
Consumption Period	MM/YYYY	M	Calendar month to which consumption information applies	10/2008

Example (daily allocation submission group 5):

HDR, GRS-022,I,SENA,RETA,ALLA,02/11/2008,12:32:02,2
 DET,TWA35610,NETA,RETA,5,DDP,D316,01/10/2008,759.025,123.754,75,10/2008
 DET,TWA35610,NETA,RETA,5,DDP,D316,02/10/2008,1314.756,62.365,75,10/2008
 Etc

GIEP23 Meter Reading Frequency

- Annual report on number and percentage of validated register readings obtained during previous gas year (rolling 4 month and rolling 12 month basis)
 - Rules: GDRR 40.2 (reference to 29.4.3 and 29.5)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	Meter Frequency	GRS-023
Sender	Char (4)	M	Party code of sender	SENA
Sent on behalf of	Char (4)	M	Party code of party on whose behalf consumption data is provided	RETA
Recipient	Char (4)	M	Party code of Recipient	ALLA
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2009
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	1

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Reconciliation Participant	Char (4)	M	Valid reconciliation code for participant	RETA
Month	MM/YYYY	M	The last month included in the period to which the meter read frequency information applies (ie for 4 month reporting for the month of October the file will include data for the months of July, Aug, Sept and Oct); for 12 month reporting the months will be the previous Nov – Oct inclusive)	10/2008
Consumer Installation Count	Num (6)	M	Number of installations with non-TOU meters at the end of the month to which this report applies	1004
Rolling 4 month Consumer Installation Count	Num (6)	M	Number of installations with non-TOU meters to which the Retailer has continuously supplied for the previous 4 months	1065
Rolling 4 month Consumer Installation Validated Register Reading count	Num (6)	M	Number of installations supplied for previous 4 months for which valid register reading was obtained – to be reported on a rolling 4 months basis	1130
Rolling 4 month Validated Register Reading Percentage	Num (3.00) (percentage)	M	Number of installations supplied for previous 4 months for which valid register reading have been obtained – to be reported on a rolling 4 months basis	94.35
Rolling 12 month Consumer Installation Count	Num (6)	M	Number of installations with non-TOU meters to which the Retailer has continuously supplied for the previous 12 months	950
Rolling 12 month Consumer Installation Validated Register Reading Count	Num (6)	M	Number of installations supplied for previous 12 months for which valid register reading have been obtained – to be reported on a rolling 12 months basis	946
Rolling 12 month Validated Register Reading Percentage	Num (3.00) (percentage)	M	Number of installations supplied for previous 12 months for which valid register reading have been obtained – to be reported on a rolling 12 months basis	100.00

**Example (meter
read frequency
data):**

HDR, GRS-023,SENA,RETA,ALLA,02/11/2009,12:32:02,12
DET,RETA,10/2008,1004,1065,1130,94.35,950,946,100.00

GIEP24 Provision of As-Billed Data

- Total quantities billed by gas gate and aggregated by invoice month for the previous billing month
 - Rule: (GDRR 52.2.1)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	File Type	GRS-024
Sender	Char (4)	M	Party code of sender	SENA
Sent on behalf of	Char (4)	M	Party code of party on whose behalf consumption data is provided	RETA
Recipient	Char (4)	M	Party code of Recipient	ALLA
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	2

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network code	Char (4)	M	Valid network code	NETA
Reconciliation Participant	Char (4)	M	Valid reconciliation code for participant	RETA
Actual Sales GJ	Num (8.3)	M	Actual volume billed in GJ	3224.232
Month Billed	MM/YYYY	M	Month to which the date of the invoice in this report applies	10/2008

Example (as-billed data): HDR, GRS-024,SENA,RETA,ALLA,02/11/2008,12:32:02,2
 DET,TWA35610,NETA,RETA,3224.232,10/2008
 DET,HST05210,NETA,RETA,2595.726,10/2008

GIEP25 Monthly UFG Factor Report

- Monthly UFG factor which has been applied each month for initial, interim and final allocations as determined by Allocation Agent
 - Rule: (GDRR 46.4.1)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	Monthly UFG Factor	ALA-025
Submission type	Char (1)	M	I – Initial UFG M – Interim UFG F – Final UFG S – Special UFG	I
Sender	Char (4)	M	Party code of sender	ALLA
Recipient	Char (4)	M	Party code of Recipient	APAR
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	4

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
UFG Factor	Num (5.4)	M	Monthly UFG Factor	1.0212
Total UFG of Gas Gate in GJ	Num (8.3)	M	GJ (= kWh x 0.0036)	41.004
Consumption Period	MM/YYYY	M	Calendar month to which UFG factor applies	10/2008

Example (monthly UFG factor report):

HDR, ALA-025,I,RETA,ALLA,02/11/2008,12:32:02,4,200810
 DET,TWA35610,NETA,1.0212,41.4,10/2008
 DET,HST05210,NETA,1.0134,20.24,10/2008
 Etc

GIEP26 Annual UFG Factor Report

- Annual UFG Factor which will apply for each gas year by gas gate
 - Rule: (GDRR 46.4.2)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	Annual URF Factor Report	ALA-026
Sender	Char (4)	M	Party code of sender	ALLA
Recipient	Char (4)	M	Party code of Recipient	RETA
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	31

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
Annual UFG Factor	Num (5.4)	M	Annual UFG Factor	1.0153
Effective Date	DD/MM/YYYY	M	Date from which Annual UFG Factor will apply	1/10/2009

Example (annual UFG report data):

HDR, ALA-026,RETA,ALLA,02/11/2008,12:32:02,4
 DET,TWA35610,NETA,1.0153,1/10/2009
 DET,HST05210,NETA,1.0246,1/10/2009
 Etc

GIEP27 Allocations

- Monthly report of allocations made by Allocation Agent by Retailer by Gas Gate on a daily basis for Initial, Interim and Final Allocations
 - Rules: (GDRR 48.2.2 (a); 49.2.2(a); 50.2.2 (a); 51)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	Allocation Reports	ALA-027
Report type	Char (1)	M	I – Initial UFG M – Interim UFG F – Final UFG S – Special UFG	I
Sender	Char (4)	M	Party code of sender	ALLA
Recipient	Char (4)	M	Party code of Recipient	RETA
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	2

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
Reconciliation Participant	Char (4)		Valid reconciliation code for participant	RETA
Allocation (GJ)	Num (8.3)	M	GJ (Note GJ= kWh x 0.0036)	759.025
Allocation group	Num (1)	M	Allocation group 1-6	2
Indication of whether allocation includes estimate by allocation agent	Char (1)	M	A = Actual i.e. allocation based on consumption and injection information provided by allocation participants (note: may include some forward estimates) E = Allocation process has involved allocation agent estimating some information	A
Consumption Period	MM/YYYY	M	Calendar month to which consumption information applies	10/2008

Example (monthly allocation):

HDR, ALA-027,I,ALLA,RETA,02/11/2008,12:32:02,2
 DET,TWA35610,NETA,RETA,759.025,2,A,10/2008
 DET,HST05210,NETA,RETA,445.050,2,A,10/2008
 Etc

GIEP28 Gas Gate Residual Profile

- Residual Profile created monthly by the Allocation Agent for each gas gate on a daily basis
 - Rules: (GDRR 48.2.2 (b); 49.2.2 (b); 50.2.2 (b); 51)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	Gas Gate Residual Profile	ALA-028
Report type	Char (1)	M	I – Initial UFG M – Interim UFG F – Final UFG S – Special UFG	I
Sender	Char (4)	M	Party code of sender	ALLA
Recipient	Char (4)	M	Party code of Recipient	APAR
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	2

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
Consumption Day	DD/MM/YYYY	M	Date of the Day to which the Gas Gate Residual Profile applies	01/10/2008
Gas Gate Residual Profile (in GJ)	Num (8.3)	M	Gas Gate Residual Profile	152.068
Gas Gate Residual Profile expressed as %	Num (3.2) percentage	M	Gas Gate Residual Profile expressed as percentage of monthly gas injections	12.45
Consumption Period	MM/YYYY	M	Calendar month to which consumption information applies	10/2008

Example (gas gate residual profile report):

HDR,ALA-028,I,ALLA,RETA,02/11/2008,12:32:02,2
 DET,TWA35610,NETA,01/10/2008,152.068,12.45,10/2008
 DET,TWA35610,NETA,02/10/2008,143.025,11.75,10/2008
 Etc

GIEP29 Seasonal Adjustment Daily Shape Value for each Gas Gate

- Seasonal Adjustment Daily Shape Values for each Gas Gate
 - To a maximum of 24 months daily values for Allocation Groups 4 and 6 by Gas Gate
 - Rule: (GDRR 53.1)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (6)	M		ALA-029
Sender	Char (4)	M	Party code of sender	ALLA
Recipient	Char (4)	M	Party code of Recipient	APAR
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num (6)	M	Total number of detail records in report	2

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
Consumption Day	DD/MM/YYYY	M	Date of Consumption Day to which the Seasonal Adjustment Daily Shape Value applies	01/10/2008
Seasonally Adjusted Daily Shape Value	Num (8.3)	M	Residual profile shape value in GJ	12.450

Example (SADSV report):

HDR,ALA-029,ALLA,RETA,02/11/2008,12:32:02,2
 DET,TWA35610,NETA,01/10/2008,12.450
 DET,TWA35610,NETA,02/10/2008,11.750

GIEP30 Initial v Final Submission Comparison

- For Allocation Groups 3 to 6 - percentage of error accuracy comparison for initial aggregated consumption against final aggregated consumption information as reported to Allocation Agent on a monthly basis
 - Rule: (GDRR 53.3)

Description	Type	M/O	Rule	Example
Header record type	Char 3	M		HDR
File type	Char 6	M		ALA-030
Sender	Char 4	M	Party code of sender	ALLA
Recipient	Char 4	M	Party code of Allocation Agent	RETA
Report Run Date	DD/MM/YYYY	M	Date the report is run	02/11/2008
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02
Number of Records	Num	M	Total number of detail records in report	2

Description	Type	M/O	Rule	Example
Detail record type	Char 3	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char 4	M	Valid network code	NETA
Reconciliation Participant	Char 4		Valid reconciliation code for participant	RETA
Initial Consumption GJ	Num (8.3)	M	Aggregated consumption for Allocations Groups 3 to 6 as reported to Allocation Agent in GJ	759.025
Final Consumption GJ	Num (8.3)	M	Aggregated consumption for Allocations Groups 3 to 6 as reported to Allocation Agent in GJ	795.528
Percentage variation	Num (3.2) percentage	M	Calculated percentage variation between the final and initial allocations (Initial/Final)	4.59
Consumption Month	MM/YYYY	M	Calendar month to which consumption information applies	10/2008

Example (Initial v Final Submission Comparison data)

HDR,ALA-030,ALLA,RETA,02/11/2008,12:32:02,2
 DET,TWA35610,NETA,RETA,759.025,795.528,95.41, 10/2008
 DET,HST05210,NETA,RETA,445.05,470.512,94.58,10/2008

GIEP31 Retailer Allocation Report

- Monthly reports by Allocation Agent on Initial, Interim and Final Allocations performed
 - Rule (GDRR 53.2)

Description	Type	M/O	Rule	Example
Header record type	Char (3)	M		HDR
File type	Char (7)	M	Allocation Report	ALA-031
Report type	Char (1)	M	I – Initial UFG M – Interim UFG F – Final UFG S – Special UFG	I
Sender	Char (4)	M	Party code of sender	ALLA
Recipient	Char (4)	M	Party code of recipient	RETA
Report Run Date	DD/MM/YYYY	M	Date the report is run	31/10/2009
Report Run Time	HH:MM:SS	M	Time the report is run	12:32:02

Description	Type	M/O	Rule	Example
Detail record type	Char (3)	M		DET
Gas Gate	Char (8)	M	Gas Gate code as determined by GIC	TWA35610
Network Code	Char (4)	M	Valid network code	NETA
Gas Gate Total for month	Num (8.3)	M	Total Gas Gate throughput in GJ for Consumption Period	158976.321
Gas Gate Total for previous 12 months	Num (8.3)	M	Total Gas Gate throughput in GJ in previous 12 months up to and including the consumption period	1657923.298
UFG Total for month	Num (8.3)	M	Total UFG (GJ) for Consumption Period at Gas Gate	148.369
UFG % for month	Num (3.2) percentage	M	UFG for Consumption Period at gas gate expressed as a % of total Gas Gate quantity	2.59
UFG Total for previous 12 months	Num (8.3)	M	Total UFG (GJ) for previous 12 months up to and including consumption period	63.241
UFG % for previous 12 months	Num (3.2) percentage	M	UFG for previous 12 months up to and including Consumption Period expressed as a % of total Gas Gate quantity	0.36
Retailer Code	Char (4)	M	Valid code for retailer	RETA
Retailer Allocation Results	Num (8.3)	M	Quantity allocated to retailer in GJ in consumption period	48.325
Retailer Allocation Results	Num (8.3)	M	Quantity allocated to retailer in GJ in previous 12 months up to and including consumption period	682.432
Consumption Period	MM/YYYY	M	Calendar month to which consumption information applies	10/2009

Example (retailer allocation report):

HDR, ALA-031,I,ALLA,RETA,31/10/2009,12:32:02
 DET,TWA35610,158976.321,148.369,2.59,63.241,0.36,RETA,48.325,682.432,10/2009
 DET,TWA35610,158976.321,148.369,2.59,63.241,0.36,RETB,3.118,52.112,10/2009

Appendix C Proposed codes for allocation participants and gas gates

As noted in the consultation paper, the proposal is to determine the same codes as specified in the Switching Determination (i.e. the “Determination by the Industry Body (Gas Industry Co) under the Gas (Switching Arrangements) Rules 2008”) (once published) plus the additional codes specified below:

- ALLA for allocation agent;
- APAR for all allocation participants; and
- additional gas gate codes to provide for the proposed groups of gas gates (i.e. notional delivery points as follows):
 - Greater Auckland, GTA03610 (Comprising Bruce McClaren (BMC17901), Henderson (HEN74101), Papkura (PAP06610) and Westfield (WST03610));
 - Greater Hamilton, GTH11301 (Comprising Hamilton Te Kowhai (HTK08301) and Hamilton Temple View (HTV11301));
 - Greater Mt Maunganui, GMM08001 (Comprising Mt Maunganui (MMU08001) and Papamoa (PPA33201)); and
 - Greater Tauranga, GTT07701 (Comprising Pyes Pa (PYE36601) and Tauranga (TRG07701)).

For completeness, Gas Industry Co’s current view of the allocation participant and gas gate codes likely to be determined in the Switching Determination are:

Codes for allocation participants

The basis for these codes is as follows:

- Codes must be made up of 4 letters, and must be unique
- The 4 letter code preferred by each participant has been accepted by Gas Industry Co. Where a participant has more than one role (eg both a distributor and a retailer) it is at their discretion as to whether to use the same code for both roles or different codes for the different roles.

The codes to be used are likely to be as follows:

Participant Name	Participant Role	Participant Code
AMS (Vector)	Meter/Corrector/Datalogger/Telemetry Owner	NGCM
Auckland Gas Company	Retailer	AGCL
	Meter/Corrector/Datalogger/Telemetry Owner	AGCL
Bay of Plenty Energy	Retailer	BOPE
Contact Energy	Retailer	CTCT
	Meter/Corrector/Datalogger/Telemetry Owner	CTCT
E-Gas 2000	Retailer	EGAS
E-Gas Ltd	Retailer	EGLT
Energy Direct NZ	Retailer	WANG
GasNet	Distributor	GNET
	Meter/Corrector/Datalogger/Telemetry Owner	GASN
Genesis Energy	Retailer	GENG
Greymouth Gas	Retailer	GMTH
MDL	Distributor	MAUI
Mighty River Power	Retailer	MEEN
Nova	Distributor	NOVA
	Retailer	GNVG
	Meter/Corrector/Datalogger/Telemetry Owner	NOVA
On Gas (Vector)	Retailer	GNGC
Powerco	Distributor	POCO
	Meter/Corrector/Datalogger/Telemetry Owner	POCO
Vector Gas (ex-UNET)	Distributor	UNLG
Vector Gas (ex-NGC)	Distributor	NGCD
Plus the additional codes for reconciliation:		
Appointed allocation agent	Allocation agent	ALLA
Allocation participants	All allocation participants	APAR

Gas gate codes

Gas Gate Name	Gas Gate Code	Notes
Alfriston	ALF15501	
Ashhurst	ASH34301	
Ballance Ammonia-Urea	BAL08201	
Ballance Ammonia-Urea	BAL09626	
Belmont	BEL24510	

Gas Gate Name	Gas Gate Code	Notes
Broadlands	BRO36301	
Bruce McClaren	BMC17901	Aggregated into the Greater Auckland Notional Delivery Point (GTA03610)
Cambridge	CAM17201	
Dannevirke	DAN05001	
Drury 1	DRU15101	
Drury 2	DRU15102	
Edgecumbe	EGC30702	
Edgecumbe DF	EGC30701	
Eltham	ELM12301	
Feilding	FLD03001	
Flatbush	FLB15601	
Flockhouse	FLH21901	
Foxton	FOX22101	
Gisborne	GIS07810	
Glenbrook	GLB03401	
Hamilton Te Kowhai	HTK08301	Aggregated into the Greater Hamilton Notional Delivery Point (GTH11301)
Hamilton Temple View	HTV11301	Aggregated into the Greater Hamilton Notional Delivery Point (GTH11301)
Harrisville	HAR11801	
Hastings	HST05210	
Hastings (Nova)	HST05203	
Hawera	HWA20801	
Hawera (Nova)	HWA20802	
Henderson	HEN74101	Aggregated into the Greater Auckland Notional Delivery Point (GTA03610)
Horotiu	HRU16101	
Huntly	HTL16601	
Hunua	HUN15301	
Hunua (Nova)	HUN15302	
Inglewood	IGW11901	

Gas Gate Name	Gas Gate Code	Notes
Kairanga	KRG24101	
Kaitoke	KTK23901	
Kakariki	KKI23701	
Kaponga	KPA12401	
Kapuni	KAP09612	
Kapuni (Lactose et al)	KAP12901	
Kauri	KUR33601	
Kawerau	KAW04405	
Kawerau (ex-Caxton)	KAW04410	
Kawerau (ex-Tasman)	KAW04411	
Kihikihi (Te Awamutu)	KIH19101	
Kingseat	KIG16801	
Kinleith	KIN02601	
Kinleith (CHH mill)	KIN04310	
Kiwitahi 1 (Peroxide)	KIW34201	
Kiwitahi 2	KIW34202	
Kuku	KUK22401	
Lake Alice	LAB20201	
Levin	LVN24401	
Lichfield DF	LCF20010	
Longburn	LNB24301	
Manaia	MNA23402	
Mangaroa	MNG34001	
Mangatainoka	MGK05401	
Marsden 1 (NZRC)	MSD01801	
Marsden 2	MSD01802	
Marton	MTN23801	
Matangi	MTG17301	
Matapu	MTP20601	
Maungaturoto DF	MUT19001	
Mokoia	MOK35801	
Morrinsville	MRV16302	
Morrinsville DF	MRV16301	

Gas Gate Name	Gas Gate Code	Notes
Mt Maunganui	MMU08001	Aggregated into the Greater Mt Maunganui Notional Delivery Point (GMM08001)
New Plymouth	NPL12101	
Ngaruawahia	NGW14501	
Oakleigh	OAK18601	
Oakura	OKU16701	
Okaiawa	OKW23401	
Okato	OKA13201	
Okoroire Springs	OKS32801	
Opotiki	OPO32001	
Opunake	OPK13001	
Oroua Downs	ORD24701	
Otahuhu B Power Station	OTB00301	
Otaki	OTA22601	
Otorohanga	OTO14101	
Paekakariki	PAE23001	
Pahiatua	PHT04901	
Palmerston North	PLN24201	
Papakura	PAP06610	Aggregated into the Greater Auckland Notional Delivery Point (GTA03610)
Papakura 3	PAP06603	
Papamoa	PPA33201	Aggregated into the Greater Mt Maunganui Notional Delivery Point (GMM08001)
Paraparaumu	PAU20101	
Patea	PTA20901	
Pauatahanui 1	PAH23201	
Pauatahanui 2	PAH23101	
Pirongia	PIR31101	
Pokuru No.2	PKD02402	
Pukekohe	PUK04201	
Pungarehu No 1	PGU13101	
Pungarehu No 2	PGH15901	

Gas Gate Name	Gas Gate Code	Notes
Putaruru	PTR32601	
Pyes Pa	PYE36601	Aggregated into the Greater Tauranga Notional Delivery Point (GTT07701)
Rainbow Mountain	RBM03101	
Ramarama	RAM15201	
Rangiuru	RAG33401	
Reporoa	RPR30801	
Rotorua	ROT08101	
Southdown Power Station	SDN00101	
Stratford	STR10201	
Takapau	TKP05101	
Taranaki Combined Cycle (TCC)	TCC00201	
Tatuanui DF	TAT16401	
Taupo	TAU07001	
Tauranga	TRG07701	Aggregated into the Greater Tauranga Notional Delivery Point (GTT07701)
Tawa A	TWA35610	
Tawa B (Nova)	TWB24810	
Te Awamutu Cogeneration Plant	TAC31001	
Te Horo	THO22701	
Te Kowhai (Receipt Point)	TEK28701	
Te Kuiti North	TKN17001	
Te Kuiti South	TKS17401	
Te Puke	TPK33301	
Te Rapa	TRP02002	
Te Rapa Cogeneration Plant	TRC02003	
Te Teko	TTK30601	
Tirau	TIR33502	
Tirau DF	TIR33501	
Tokoroa	TKR19701	
Tuakau	TUK06501	
Waikanae	WAK22801	

Gas Gate Name	Gas Gate Code	Notes
Waikeria	WKE19201	
Waitangirua	WTG06910	
Waitara	WTR12001	
Waitoa	WTA16501	
Waitoki	WTK33901	
Waitoki B	WTK33902	Network interconnection point (note: this gas gate does not appear in OATIS)
Waitotara	WTT20301	
Wanganui	WAG21501	
Warkworth	WRK18901	
Waverley	WVY23601	
Wellsford	WEL18301	
Westfield	WST03610	Aggregated into the Greater Auckland Notional Delivery Point (GTA03610)
Whakatane	WHK32101	
Whangarei	WHG07501	

Appendix D Information exchanges from the allocation agent to Vector Transmission

The dummy information attached to this Appendix details the information exchanges that the allocation agent will be required to submit to Vector Transmission (via an upload into OATIS). As noted in the consultation paper, Gas Industry Co will seek to negotiate this as a requirement in the allocation agent service provider agreement.

Note: The attachment is a sample file only and does not contain real figures. RETA and RETB have been used to identify shippers. In practice, the allocation agent will be required to use the codes recognised by OATIS for each retailer. Hypothetical codes have been used in this 'dummy' example to reiterate that the files are sample only.

Attachment – Allocation Agent Upload

Field Definitions/Requirements

Downstream Allocation File					
Row Type	Element	Description	Reference	Rules	
Row 1	All Columns				Ignore
Details – (Row 2 to n-1)	Column 1	Welded Point Id	WeldedPoint.WeldedPointCode	Obligation: Format: Rules:	Mandatory Alphanumeric Must exist as a valid delivery welded point in the WeldedPoint table. If the user is a Downstream Allocation Agent or Gas Transfer Agent they must have an active Allocation Agreement/Gas Transfer Agreement for the welded point
Details	Column 2	Transmission Date	SplitDeliveryDaily.SplitDeliveryDailyTransmissionDate	Obligation: Format:	Mandatory dd/mm/yyyy
Details	Column 3	Shipper ID	Shipper.ShipperCode	Obligation: Format: Rules:	Mandatory Alphanumeric Must exist as a valid shipper in the Shipper table.
Details	Column 4	Contract ID	Contract.ContractCode	Obligation: Format:	Mandatory Alphanumeric Must exist as a active Standard TSA, Non-standardTSA or Supplementary agreement contract for the Shipper, the contract must be valid for the transmission date, and must include Welded point as delivery point on the contract.
Details	Column 5	Delivered Energy	SplitDeliveryDataDaily.SplitDeliveryDailyEnergy	Obligation: Format:	Mandatory 9999999999.999 Positive or negative
Footer (Row n)	Column 1	Total Label		Obligation: Value:	Mandatory 'Total'
Footer	Columns 2 - 4				Ignore

Footer	Column 5	Sum Delivered Energy	Compare to sum of PresplitMeteringDaily.Energy for all delivery meters for welded point. (or for all members of the notional welded point where the delivery point is a notional welded point). Tolerance used is the system parameter named 'Split-PreSplit Metering Tolerance'	Obligation: Format: Rules:	Mandatory 9999999999.999 Must be within the expected tolerance (expected to be 0.003Gj) of total delivered energy at all delivery meter groups (meter group type = 'Delivery') at the Welded Point, where the welded point is not an interconnection point or bi-directional (welded point type). This check is not performed if the User is Billing, Billing Super user or Gas Transfer Agent.
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Sample file:

Welded Point ID	Date	Shipper Id	Contract Id	Delivered Energy
BEL24510	1/12/2007	RETA	1109	1566.114
BEL24510	2/12/2007	RETA	1109	940.898
BEL24510	3/12/2007	RETA	1109	3237.515
BEL24510	4/12/2007	RETA	1109	3573.763
BEL24510	5/12/2007	RETA	1109	3370.984
BEL24510	6/12/2007	RETA	1109	3796.701
BEL24510	7/12/2007	RETA	1109	3718.371
BEL24510	8/12/2007	RETA	1109	1730.741
BEL24510	9/12/2007	RETA	1109	1033.937
BEL24510	10/12/2007	RETA	1109	2715.397
BEL24510	11/12/2007	RETA	1109	3105.801
BEL24510	12/12/2007	RETA	1109	3654.433
BEL24510	13/12/2007	RETA	1109	3004.631
BEL24510	14/12/2007	RETA	1109	2961.895
BEL24510	15/12/2007	RETA	1109	1892.876
BEL24510	16/12/2007	RETA	1109	1307.52
BEL24510	17/12/2007	RETA	1109	2822.973
BEL24510	18/12/2007	RETA	1109	3038.637
BEL24510	19/12/2007	RETA	1109	3189.439
BEL24510	20/12/2007	RETA	1109	3052.645
BEL24510	21/12/2007	RETA	1109	2626.138
BEL24510	22/12/2007	RETA	1109	1725.997
BEL24510	23/12/2007	RETA	1109	1050.674
BEL24510	24/12/2007	RETA	1109	842.962
BEL24510	25/12/2007	RETA	1109	289.836
BEL24510	26/12/2007	RETA	1109	533.919
BEL24510	27/12/2007	RETA	1109	1279.312
BEL24510	28/12/2007	RETA	1109	1010.566
BEL24510	29/12/2007	RETA	1109	692.805
BEL24510	30/12/2007	RETA	1109	562.912

BEL24510	31/12/2007	RETA	1109	677.335
BEL24510	1/12/2007	RETB	1120	671.192
BEL24510	2/12/2007	RETB	1120	403.242
BEL24510	3/12/2007	RETB	1120	1387.506
BEL24510	4/12/2007	RETB	1120	1531.613
BEL24510	5/12/2007	RETB	1120	1444.707
BEL24510	6/12/2007	RETB	1120	1627.158
BEL24510	7/12/2007	RETB	1120	1593.588
BEL24510	8/12/2007	RETB	1120	741.746
BEL24510	9/12/2007	RETB	1120	443.116
BEL24510	10/12/2007	RETB	1120	1163.742
BEL24510	11/12/2007	RETB	1120	1331.058
BEL24510	12/12/2007	RETB	1120	1566.186
BEL24510	13/12/2007	RETB	1120	1287.699
BEL24510	14/12/2007	RETB	1120	1269.384
BEL24510	15/12/2007	RETB	1120	811.232
BEL24510	16/12/2007	RETB	1120	560.366
BEL24510	17/12/2007	RETB	1120	1209.846
BEL24510	18/12/2007	RETB	1120	1302.273
BEL24510	19/12/2007	RETB	1120	1366.902
BEL24510	20/12/2007	RETB	1120	1308.277
BEL24510	21/12/2007	RETB	1120	1125.488
BEL24510	22/12/2007	RETB	1120	739.713
BEL24510	23/12/2007	RETB	1120	450.289
BEL24510	24/12/2007	RETB	1120	361.269
BEL24510	25/12/2007	RETB	1120	124.216
BEL24510	26/12/2007	RETB	1120	228.822
BEL24510	27/12/2007	RETB	1120	548.276
BEL24510	28/12/2007	RETB	1120	433.1
BEL24510	29/12/2007	RETB	1120	296.916
BEL24510	30/12/2007	RETB	1120	241.248
BEL24510	31/12/2007	RETB	1120	290.286
Total				92868.18