

Appendix A Submissions template

Statement of Proposal: Downstream Reconciliation Rules Review

Submission prepared by: (company name and contact)

QUESTION	COMMENT
1 Do you agree that commercial arrangements provide sufficient obligations on meter owners for the purpose of the Rules? With regard to the suggestion by the DRAG, do you consider there is an identifiable market failure that merits Gas Industry Co developing a workstream on the creation of guidelines and/or principles for metering contracts?	
2 Given that the review will cover all of the long-standing exemptions do you agree that the exemptions process should be retained?	
3 Do you agree with the proposal to codify a rule for direct connect gas gates? Do you agree with the creation of a new rule enabling Gas Industry Co and the allocation agent to access direct connect injection data as requested?	
4 Do you agree with the proposed rule for G1M gas gates? Do you agree with establishing the deterministic criteria for G1M gas gates in an industry determination?	
5 Do you agree with the proposed rule change for unmetered and oversized metered gas gates?	

QUESTION	COMMENT
6 Do you have any comments on Gas Industry Co's recommendation not to change the method of apportioning the ongoing fees?	
7 Do you agree with the proposed rule enabling the correction, where necessary, of an AUFG factor if it is found to be incorrect?	
8 Do you agree with the proposal for dealing with estimated daily energy quantities?	
9 Do you agree with the proposal to amend the rules relating to trading notifications?	
10 Do you agree that a rule should be created enabling performance audits to cover the accuracy of data population in the registry? Do you think that audits should be limited to certain fields relevant to reconciliation or would you prefer broader audit arrangements contained within the Switching Rules?	
11 Do you agree that rule 75 should be amended to allow the auditor more discretion in determining who should be responsible for paying the costs of an event audit?	
12 Do you agree that a rule should be created to require audits of major system changes? If so, do you agree that a post go-live audit should also be required? Do you think the definition of "major" should be specified in the Rules or in an industry guideline?	

QUESTION	COMMENT
<p>13 Do you agree that rule 42 is redundant and should be deleted from the Rules? Will your organisation be adversely affected by its removal? Should the obligations in rule 28.4 be extended to transmission system owners?</p>	
<p>14 Do you support the proposal to allow allocation participants access to the GAR170 report? If not, would you support disclosure of submission information consistent with the SupSub report?</p>	
<p>15 Do you agree with the minor and technical amendments proposed in this section? Do you agree that the proposals meet the criteria in section 43N(3) of the Gas Act?</p>	
<p>16 Do you have any comments on the transitional issues discussed in this section?</p>	