

Scope

- We believe that many of the required transmission balancing objectives can be met by a combination of:
 - BGX enhancements.
 - Changes to MDL Operating Procedures.
 - Changes to the MPOC.
- This presentation concentrates on what has been, and what can be achieved using these means.
- While this presentation is pitched at a high level, the great majority of the work discussed here has been developed in detail and is available to be discussed in the form of specific MPOC changes.



Exclusions

- This presentation does not deal with:
 - Implementation of a "unified" balancing agent.
 - Direct BA to Causer relationship.
 - Extended nominations.
 - -D+1.
 - Overall system design.
- These are up for consideration later.



Scope

- 1. Back to Back Balancing
 - 1. Practicality
 - 2. Incentives Pool
 - 3. Tolerances
 - 4. TSO Imbalances
 - 5. Mismatch
 - 6. ROI Adjustments
- 2. BGX changes
 - 1. Transparency
 - 2. Marginal Pricing
 - 3. Timing
 - 4. BGX Upgrade
- 3. Revised SOPs
- 4. Balancing Agent Duties
- 5. Dispute Resolution
- 6. Transition



Back to Back Balancing 1

- Implementation through MPOC changes is practicable.
- OATIS changes will be required, but the current view is that these need not be extensive.
- Both daily and hourly models considered, but an hourly model considered impracticable for the present.
- A daily model requires the retention of peaking charges.
- Simulation model runs show that close to 100% recovery of balancing charges is possible, given a substantial reduction/elimination of tolerances.
- The match between balancing gas costs and balancing charges is much better than obtainable at present through cash outs and Incentives Pool charges.



Back to Back Balancing: Incentives Pool

- With back to back balancing the Incentives Pool mechanism is not needed for the collection of imbalance charges.
- Current thinking is to remove the Incentives Pool from the MPOC, and:
 - Retain peaking charges, which would be set at a specific dollar amount per GJ.
 - Seek Industry views on the inclusion of provisions for Welded Party to Welded Party claims formerly handled through the Pool.
 - The Critical Contingency Regulations appear to reduce the need for this mechanism.
 - If it is retained, it should be developed in a way that does not leave the Balancing Agent as judge and jury for any claim made.
- ILONs are not needed.



Back to Back Balancing: Imbalance Tolerances

- Under back to back balancing the cost of all balancing gas is allocated. If not allocated to welded points, it is socialised and recovered through the tariff.
- The primary effect of a moderate allocation of tolerances is to shift balancing costs from one welded point with imbalance to another.
- As tolerance levels increase, the level of socialisation of balancing costs also increases. This eventually manifests itself as increased tariffs.
- Tolerances act against the "cost to causer" principle.
- Our current thinking is to retain the provision for imbalance tolerances in the MPOC, but set them to zero.



Back to Back Balancing: TSO Imbalances

- The concept of TSO caused imbalance is easy to understand.
 The practical problems in managing it are more difficult.
- In the case of the Maui Pipeline, it may arise from three main causes:
 - UFG otherwise known as meter error.
 - "Socialised" balancing gas that has not been removed from the pipeline.
 - Changes in linepack thresholds due to compressor operation or changes in pipeline flow.
- Actions required:
 - Buy or sell UFG at reasonable intervals. (See SOP discussion).
 - Buy or sell any socialised gas. (Zero tolerances eliminate this problem).
 - Consider setting fixed target line-packs that is don't use a target line pack that changes with the flow rate.



Back to Back Balancing: UFG

How hard can it be to deal with UFG?

Maui Pipeline: UFG August 2009



Maui Pipeline UFG (GJ)				
Sep-08	-31,421			
Oct-08	-32,178			
Nov-08	-11,022			
Dec-08	-38,258			
Jan-09	-31,221			
Feb-09	-46,711			
Mar-09	-36,994			
Apr-09	-53,975			
May-09	-59,901			
Jun-09	-37,057			
Jul-09	-67,107			
Aug-09	-41,537			



Back to Back Balancing: Other Topics

Mismatch

- Mismatch prices will retained and set to the most recent prices for balancing gas.
- Mismatch is now very rare. If it occurs it will be cashed out on the day at the mismatch price.

Metering Adjustments

- We propose notifying any ROI changes resulting from metering adjustments or similar causes in advance.
- However we do not intend to alter balancing cash outs retrospectively.



BGX: Transparency

- MDL has accepted the principle of an open transparent market.
 Prices and quantities of all balancing transactions are available on the BGX.
- There are still questions about access to the BGX from points outside the Maui Pipeline. These will be better dealt with as part of the presentations next week.
- We are proposing changes to the content of Section 4 of the MPOC that will increase the amount of operational information that will be generally available to all pipeline users. The intention is to provide better information through the BGX.
- We think the additional information proposed will make the operation of back to back balancing more efficient.



Marginal Pricing and Thresholds

- MDL has adopted a weighted average method of calculating mismatch prices from balancing costs.
- This reflects the fact that the BGX, in effect, conducts separate markets for each ID cycle.
- Marginal Pricing could be adopted, either for each ID cycle or each complete day.
- Thresholds should depend on the value attributed to avoiding a contingency event or a critical contingency event.
- This may mean that the threshold price for Call gas should be set at a reasonably high level.



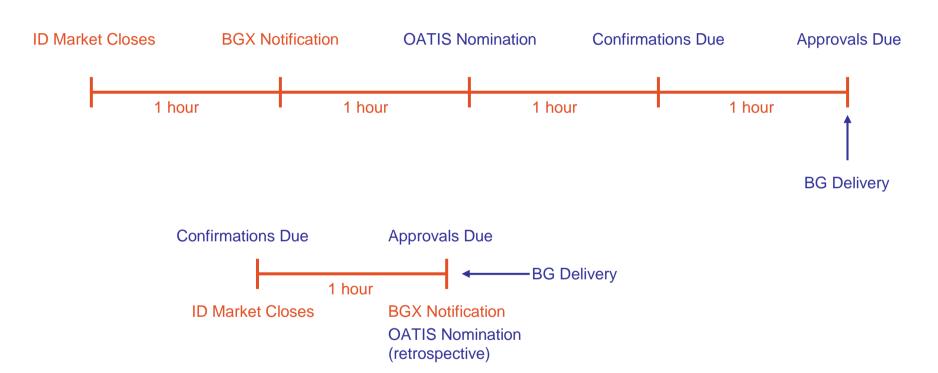
BGX: Timing

- The conditions under which balancing gas is supplied to the Maui Pipeline have changed substantially in the last year.
- We are proposing amendments to the MPOC that will allow the quantity of balancing gas required at a particular ID cycle to be set once the nominations for that cycle have been confirmed.
- This will allow:
 - More accurate determination of the quantity of balancing gas required.
 - A reduction in lead times for balancing gas supply.



BGX – Timing

Closing the 4 hour gap:





BGX – Upgrade Overview

The BGX Upgrade Project will see improvements to:

- Market efficiency
 Making the BGX Notification process more functional
- Information
 Improving Pipeline, Market and Financial information availability
- User interaction
 Broadening Balancing Market Participants functionality

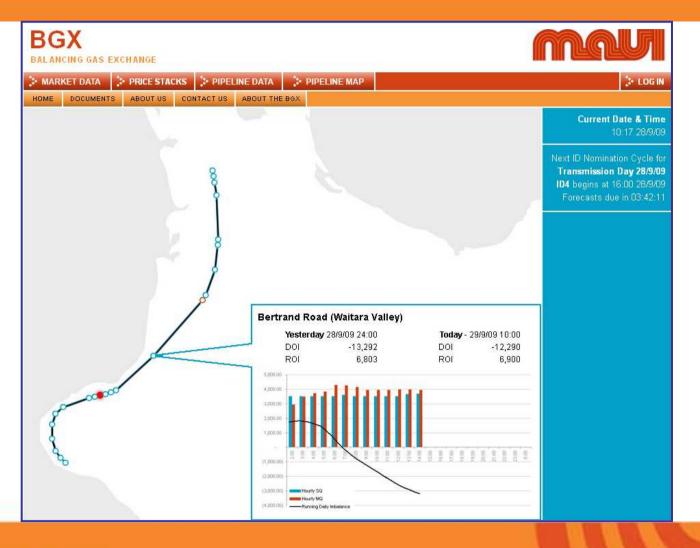


BGX - Information

- Real-time Operational Imbalance data
- Real-time Cash Outs
- Real-time Line Pack data
- Real-time Pressure data
- Back-to-Back Cash Out statements
- BGX Financial Disclosure

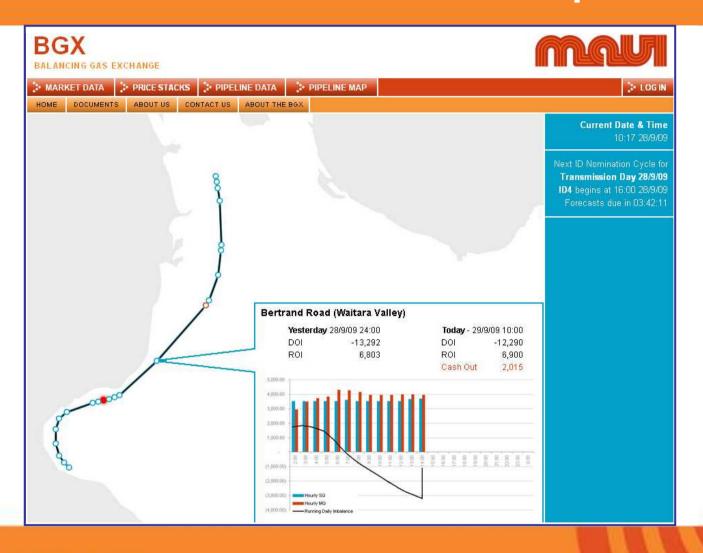


BGX - Real-Time Operational Imbalance Information



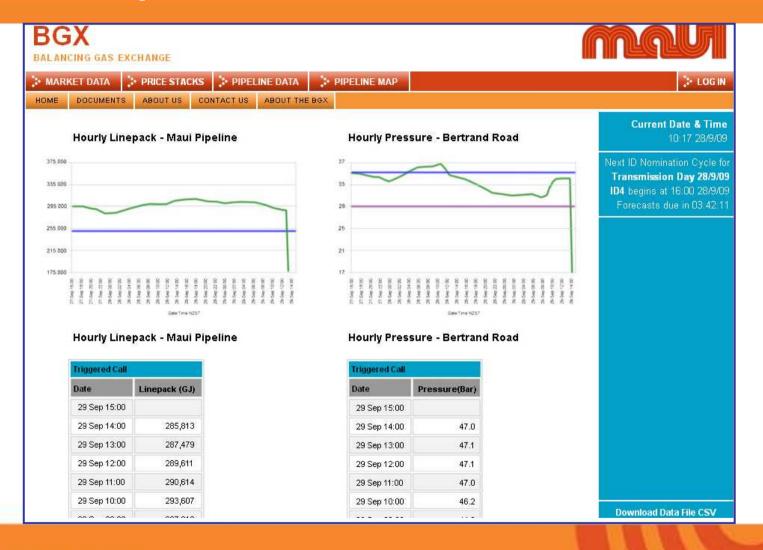


BGX - Real-Time Cash Out ROI Updates





BGX - Pipeline Information





BGX - Back-to-Back Cash Out Statements





BGX - Back-to-Back Cash Out Statements





BGX - Financial Disclosure

- GJ
- \$/GJ
- Total \$
- Product
- Cycle
- Monthly Summary

1	BGX Financi	BGX Financial Disclosure - September '09					
2	Date	GJ	\$ per GJ	Total	Product	Cycle	
3	9/1/2009	(2,500)	\$2.00	\$5,000.00	Put	ID1	
4	9/4/2009	5,000	\$0.00	\$0.00	Call	ID3	
5	9/4/2009	5,000	\$11.29	\$56,450.00	Call	ID3	
6	9/6/2009	5,000	\$0.00	\$0.00	Call	ID1	
7	9/7/2009	5,000	\$0.00	\$0.00	Call	ID1	
8	9/7/2009	4,000	\$14.50	\$58,000.00	Call	ID3	
9	9/11/2009	(5,000)	\$1.50	\$7,500.00	Put	ID3	
10	9/11/2009	(5,000)	\$1.25	\$6,250.00	Put	ID4	
11	9/12/2009	(2,500)	\$1.51	\$3,775.00	Put	ID3	
12	9/12/2009	(2,500)	\$1.50	\$3,750.00	Put	ID3	
13	9/12/2009	(2,500)	\$1.50	\$3,750.00	Put	ID4	
14	9/12/2009	(2,500)	\$1.25	\$3,125.00	Put	ID4	
15	9/13/2009	(2,500)	\$1.51	\$3,775.00	Put	ID3	
16	9/13/2009	(1,000)	\$1.50	\$1,500.00	Put	ID3	
17	9/13/2009	(1,500)	\$1.25	\$1,875.00	Put	ID3	
18	9/17/2009	(5,000)	\$1.25	\$6,250.00	Put	ID1	
19	9/19/2009	(5,000)	\$1.25	\$6,250.00	Put	ID3	
20	9/20/2009	5,000	\$0.00	\$0.00	Call	ID4	
21	9/21/2009	5,000	\$0.00	\$0.00	Call	ID1	
22	9/21/2009	5,000	\$11.94	\$59,700.00	Call	ID3	
23	9/21/2009	3,000	\$12.39	\$37,170.00	Call	ID3	
24	9/21/2009	3,000	\$10.93	\$32,790.00	Call	ID4	
25	9/21/2009	1,600	\$12.25	\$19,600.00	Call	ID4	
26	9/23/2009	(2,500)	\$1.20	\$3,000.00	Put	ID1	
27	9/23/2009	(2,500)	\$1.00	\$2,500.00	Put	ID1	
28	9/23/2009	(2,500)	\$0.75	\$1,875.00	Put	ID2	
29	9/23/2009	(1,000)	\$0.51	\$510.00	Put	ID3	
30	9/23/2009	(1,500)	\$0.25	\$375.00	Put	ID3	
31	9/23/2009	(2,500)	\$0.25	\$625.00	Put	ID4	
32	9/24/2009	(5,000)	\$0.25	\$1,250.00	Put	ID1	
	Ĥ → H / Jul '09 / Aug '09 \ Sep '09 /						

Monthly Summary					
Month:	Sep-09				
Call Balancing Gas					
	GJ	Cost			
Total	46,600	\$263,710.00			
Nominal value	\$150,000.00				
*Based on estimated value of \$6.00					
Put Balancing Gas					
	GJ	Income			
Total	(68,000)	\$66,835.00			



BGX - User Interaction

- Automated Financial Disclosure
- Automated Market Data
- Simplified Countdown Timer

User-Specific Transaction Search

Next ID Nomination Cycle for Transmission Day 28/9/09 ID4 begins at 16:00 28/9/09 Forecasts due in 03:42:11

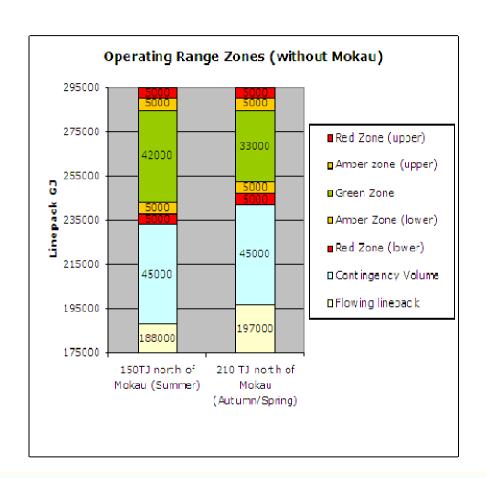


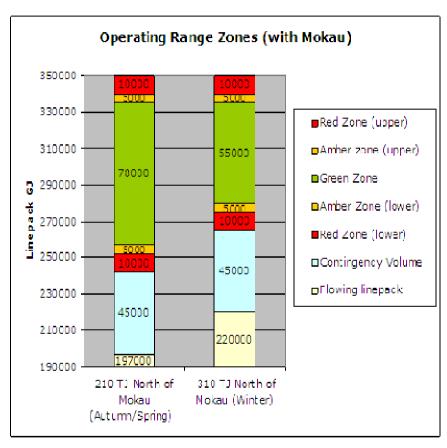
Revised SOPs

- Review of Contingency Volume.
- Maximise pipeline flexibility available to users.
- Maintain pipeline capacity.
- Acceptable incidence of contingency events.
- Greater flexibility to reduce balancing costs.
- Provide method for handling UFG and keep pipeline from accumulating or losing gas.



Revised SOPs: Operating Ranges







Revised SOPs: Active line pack management

- Supports approved nominations by maintaining pipeline flexibility when line pack is gained or lost from the pipeline. The method used is:
 - Adjust line pack for amount of accumulated ROI and compare with target line pack.
 - If not within 5 TJ then adjust by purchase or sale, most likely using ID3 cycle.
 - Adjustment may be delayed if it would push line pack into the orange zone.
 - If Mokau running, target might be set higher to help avoid use of Call gas.



Balancing Agent's Duties

- We are proposing that the MPOC be amended to include a section on the Balancing Agents duties.
- Provisions would include:
 - Buying and selling on least cost, arms length basis.
 - Publication of price stacks, transactions, timeframes and terms and conditions.
 - Operation according to the SOPs, which are published.
 - Operation of the BGX and provision of information on it.
 - Monthly expenditure and income statements.
- Detail of these provisions can be made available.



Dispute Resolution

- A process for the quick and efficient resolution of disputes is needed.
- We propose amending the MPOC to provide for:
 - Provisions to negotiate disputes directly between the parties for a period of up to 15 business days.
 - After the 15 days, either party may refer the dispute to the Rulings Panel constituted by the Gas Governance Compliance Regulations.
- We believe implementation of this proposal will require amendment of the regulations to allow for disputes to be handled by the panel.



Transition Provisions

- Implementation of the changes proposed here will require a carefully staged implementation process.
- We therefore propose amending the MPOC to allow change requests to incorporate:
 - A timetable for the changes to take effect.
 - Transitional provisions to allow them to take effect in an orderly way; and
 - Conditions that must be satisfied for them to take effect.
- A change request incorporating these provisions may precede the other MPOC changes set out here.

