

Subject **Analysis of Submissions and Responses –
Notification of Information Exchange File Formats by the Industry
Body (Gas Industry Co) under the Gas (Downstream Reconciliation)
Rules 2008, Version 2.0**

Date **31 July 2008**

Introduction and purpose

The Gas (Downstream Reconciliation) Rules 2008 (the “Reconciliation Rules”) provide for the establishment of efficient and effective downstream allocation and reconciliation arrangements, including the accurate and timely allocation of gas recorded at gas gates between those retailers who are metering gas to consumers from the distribution system (or from the transmission system where applicable) attached to that gas gate. A key element in the arrangements is the establishment of an allocation agent to allocate gas quantities, including unaccounted for gas (UFG), to retailers at gas gates.

The Reconciliation Rules provide for the industry body (Gas Industry Co) to give notice to allocation participants specifying one or more information exchange file formats (File Formats) that allocation participants must provide information to the allocation agent in.

Submissions were sought from gas industry participants on the proposed File Formats. Rule 25 of the Reconciliation Rules provides that Gas Industry Co must consult with allocation participants prior to giving notice of the File Formats. The File Formats have largely been developed by an industry working group – the Information Exchange File Formats Working Group (IEFFWG). Drafts of the File Formats were initially widely circulated for industry feedback in April 2008. A formal consultation paper was issued to industry participants on 13 June 2008 seeking submissions on the proposed File Formats. During July 2008 a further two drafts of the proposed File Formats were circulated to the IEFFWG (the most recent and final draft was circulated to all addressees on Gas Industry Co’s Reconciliation Project e-mail distribution list). The File Formats have been developed in light of all feedback provided by industry participants during this process.

This document analyses the submissions received by Gas Industry Co as a result of the consultation paper on the File Formats issued for comment in June 2008. Submissions were received from six industry participants:

- Contact Energy;
- Genesis Energy;
- Mighty River Power;
- Nova Gas;
- Powerco; and
- Vector.

The material issues raised by the industry participants in their respective submissions are discussed below. In addition, there were a number of minor comments on the file formats. These are noted in the summary of submissions, attached as Attachment 1. Gas Industry Co also notes that some of the submissions received addressed issues beyond those related to the notification of the proposed File Formats. This Analysis of Submissions and Responses does not intend to address those issues.

Summary of the Key Issues raised in Submissions and the proposed Gas Industry Co Response

Issue 1: Proposals for Rule Changes

Several submitters raised issues which require a rule change. Irrespective of whether a rule change is appropriate in the longer term, it is not practicable to consider rule changes immediately unless a change is required to make the rules operable. None of the changes suggested fall into that category.

However, there does need to be an explicit rule change process and this needs to be publicised for the information of all allocation participants. Gas Industry Co will develop such a process as soon as practicable and it will have the following elements:

- A register of agreed or requested (to be determined) rule changes will be maintained on the Gas Industry Co website;
- A process for accepting and considering rule changes will be established, and this process will include consultation with allocation participants; and
- As a general principle, rule changes will be collected together as packages, and put through the rule change process at intervals rather than as they are put forward for consideration (unless the rule change is urgently required).

Issue 2: Availability of reports to distributors

Distributors have requested that they receive from the allocation agent several files that are, under the Reconciliation Rules, only to be provided to retailers (i.e. monthly report of allocations made by the allocation agent by retailer by gas gate on a daily basis for initial, interim and final allocations; total quantities billed by gas gate and aggregated by invoice month for the previous billing month; the percentage of error accuracy comparison for initial aggregated consumption against final aggregated consumption information as reported to the allocation agent on a monthly basis for allocation groups 3 to 6).

Some retailers believe that it is inappropriate for distributors to receive some or all of these files.

Gas Industry Co notes that, in respect of reports or information that are not required to be published (i.e. on the allocation agent website) under the Reconciliation Rules, it will be up to the individual allocation participant who receives or provides the report/information to consent to their files being provided to the distributor concerned. Where reports or information are published on the allocation agent website under the Reconciliation Rules, distributors will be able to receive those files. The proposed functional specification for the allocation system has been developed to accommodate these arrangements. As the Reconciliation Rules take effect, Gas Industry Co intends to monitor these flows of information and, if further disclosure to other parties such as distributors is viewed to be appropriate or necessary, Gas Industry Co will consider implementing a rule change to effect this.

Issue 3: Principles document and supporting guidance notes

It has been requested that Gas Industry Co develop and publish, as soon as possible, a “principles” document and supporting guidance notes on the File Formats. This would assist with the successful implementation of the File Formats.

This matter has been incorporated into Gas Industry Co’s Reconciliation Project implementation work programme, with a high priority assigned. Work will commence on 1 August 2008.

Issue 4: Resubmission of either partial or full files

It was requested that allocation participants be permitted to resubmit either a partial or full file. The proposed functional specification for the allocation system has been developed to accommodate this.

However, it should be noted that the allocation system will not delete any previous submission information for which it does not receive updated submission information (e.g. if a retailer mistakenly submits consumption information for allocation group 5 instead of for allocation group 6, the allocation system will not delete the allocation group 5 consumption information when the retailer submits correctly the allocation group 6 consumption information. Instead the retailer will need to submit a replacement file of allocation group 5 consumption information for the same period, containing all zeroes).

Issue 5: Treatment of TOU meters

The treatment of TOU meters below 10TJ or below 250GJ was raised in some of the submissions. While the Reconciliation Rules (rules 29 and 30 in particular) specify how such meters are to be treated, Gas Industry Co has also included the following explanatory note in the preambles to the relevant File Formats to assist clarification:

- ICPs \leq 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 (i.e. submitted as allocation group 2); or
 - If annual consumption \leq 250 GJ submitted as actual and/or estimated monthly quantities (i.e. submitted as allocation group 6).
 - ICPs with TOU metering that have annual consumption of “250GJ $<$ annual consumption \leq 10TJ” must be submitted as daily data (i.e. as gas allocation group 2) in GAS050 and must be excluded from allocation group 4 aggregated data submitted using GAS040.

To the extent that submissions requested a rule change in respect of the treatment of TOU meters for consumption \leq 250 GJ per annum (or \leq 10 TJ per annum), Gas Industry Co acknowledges this may be an issue in the future, particularly as smart meters are rolled out by allocation participants. Gas

Industry Co intends to monitor this issue over time but reiterates that such rules changes are not considered appropriate at this time.

Issue 6: Frequency of meter reads

The overwhelming majority of allocation participants noted that their preference was to submit on a monthly basis their reports on the number and percentage of validated register readings obtained during the previous gas year. This preference has been incorporated into the proposed functional specification for the allocation system.

Issue 7: Standardisation

Standardisation across the File Formats was requested. Gas Industry Co has sought to standardise the File Formats where possible. However, the format of the files submitted to/received from transmission system owners is different to the other file formats. This is in order to accommodate the requirements of the Open Access Transmission Information System (OATIS).

Issue 8: Consolidation of UFG information

It was proposed that the reporting of UFG information could be consolidated into fewer files. As a consequence, Gas Industry Co has rationalised the number of files containing this information.

Issue 9: Various Non-File Format Issues

Vector raised the following general issues that pertain more to the implementation of the Reconciliation Rules than to the file formats:

- Treatment of confidential data by the allocation agent;
- Information quality in the absence of the gas registry during the first several months of operation of the Reconciliation Rules;
- The accuracy of retailer consumption information; and
- The need to address several implementation issues including testing, training and the transition between allocation agents.

Gas Industry Co notes that some of these issues have been addressed in previous consultation papers in respect of the Reconciliation Rules. Other implementation issues are intended to be addressed in Gas Industry Co's implementation planning.

Attachment 1 – Summary of Submissions

The table below summarises comments from submitters, question by question. For simplicity, where a submission expresses support for a proposal, this is recorded as no comment (i.e. the analysis focuses on suggested changes to the File Formats.)

Question or Issue	Content of submissions
<p>Qn 1: Do submitters have any general comments on the file formats?</p>	<p>Contact: Not appropriate for distributors to receive GIEP24, GIEP27, or GIEP30. Appropriate for distributors to receive a modified GIEP31, but this would need to be distributor specific.</p> <p>Genesis: Principles document and supporting guidance notes on file formats need to be developed and published ASAP to help successful implementation of standardised formats. Use existing Ieffwg to make best use of this knowledge base. File naming protocol needs to ensure that it encompasses what is already being used in the GIEPs including making the title of the file the same as the file type in the header record (e.g. GIEP21 has a file type in the header record of GRS-21 – this should be GIEP21).</p> <p>Standardisation is preferable across field descriptions, types and rules.</p> <p>Genesis wants to be able to resubmit either a partial or full file, with the file type identified in the file name.</p> <p>Do not believe that distributors need to receive all of this information. They only need to receive GIEP27 for areas for which they are the distributor. Distributors currently receive similar information in a different format so there is duplication of information and therefore costs incurred in this provision.</p> <p>Mighty River Power: No</p> <p>Nova: In relation to wash-ups, what happens when parties do not resubmit gate data in relation to an historical month – do previous submissions remain valid? Alternatively parties could be required to submit data for all gates each wash-up even if there is no change to the previously submitted data. Nova does not have a strong preference - would like to hear other views.</p> <p>On the issue of provision of data to distributors and transmission system operators,</p>

	<p>Nova believes that they should contribute to the costs since they benefit.</p> <p>Powerco: Gas Industry Co should develop a trading notification guideline and a trading notification form as was done for electricity reconciliation.</p> <p>DET and HDR lines should be included in the file formats as they increase the readability of the files.</p> <p>Powerco would like to receive files GIEP24 and GIEP30 to assist it to identify data irregularities.</p> <p>Vector: Concerned that Vector’s contractual obligation to ensure confidential information remains as such, and therefore encourages Gas Industry Co to more fully inform industry participants of how their data will be handled by the Allocation Agent in terms of confidentiality. Believes improved outcomes will result from a more comprehensive addressing of confidentiality issues.</p> <p>Believes that information quality will be impaired through proceeding in the absence of a gas registry, which acts as the database of record.</p> <p>Concerned that Gas Industry Co has not prescribed how estimated consumption data should be collated by the retailer and that estimation methods will not be quality checked. As stated in its response to 11 January 2007 Gas Industry Co paper, Vector believes that all retailers should conduct meter reads on a minimum bi-monthly basis.</p> <p>A number of implementation issues need to be addressed including design of checks and balances to ensure the system is running smoothly from 1 October 2008, inclusion of a 2 month testing period including training for Allocation Agent in use of OATIS, and handling of transition between old and new systems.</p> <p>Disagrees with the concept of a file containing data for several consumption periods. Header record should have a unique identifier (e.g. batch name) and also contain a field for the consumption period. Each detail record should also contain the same identifier.</p> <p>Vector strongly supports making GIEP25, GIEP27, GIEP30 and GIEP31 available to distributors, as it enables distributors to assist in identifying and minimising UFG (e.g. distributors can reconcile energy volumes used for calculating distribution charges to reconciled energy volumes and identify discrepancies).</p>
<p>Qn 1 continued: Are there any additional file formats that submitters consider are required?</p>	<p>Contact: No</p> <p>Genesis: No</p> <p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: No</p> <p>Vector: No</p>
<p>Qn 2: Any comments or</p>	<p>Contact: Support inclusion of historic estimate information in this file rather than in</p>

<p>additional issues in respect of GIEP20?</p>	<p>a separate report. Also consider that sites with TOU metering and annual consumption below 10 TJ should be validly allocated to allocation group 2 and submitted as daily data in GIEP21.</p> <p>Genesis: Even if there is a meter on site that has the ability to be TOU, at less than 10 TJ consumption need discretion to decide how best to record the metering information. Gas Industry Co needs to make it a priority to review this issue in the Reconciliation rules.</p> <p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: GIEP20 and GIEP27 have the Allocation Group as 1 character, while GIEP21 and GIEP22 have it as 2 characters.</p> <p>Vector: ICP count should be included and should eventually be mandatory. Rules should mandate for provision of an "ICP days" count.</p>
<p>Qn 3: Any comments on GIEP21?</p>	<p>Contact: Consider that a site with TOU metering and annual consumption below 10 TJ should be validly allocated to allocation group 2 and submitted as daily data in GIEP21.</p> <p>Allocation Group is shown as Char 2 (differs from Char 1 in GIEP20 and Char 4 in Registry Detailed Business Requirements).</p> <p>Genesis: No</p> <p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: Need to amend file format to enable a retailer to provide an estimate for allocation groups 1 and 2 (rule 30.3.1).</p> <p>GIEP20 and GIEP27 have the allocation group as 1 character, while GIEP21 and GIEP22 have 2.</p> <p>Vector: No</p>
<p>Qn 4: Any comments on GIEP22?</p>	<p>Contact: No</p> <p>Genesis: No</p> <p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: GIEP20 and GIEP27 have the allocation group as 1 character, while GIEP21 and GIEP22 have it as 2 characters.</p> <p>Vector: No</p>
<p>Qn 5: Any comments or additional issues on GIEP23?</p>	<p>Contact: Recommend rule change to rule 40.2 to require meter reading frequency to be reported monthly rather than annually.</p> <p>The words Non-TOU should be added to the Rule for detail rows 6, 7, 9 and 10.</p> <p>Genesis: Inclusion of both counts and the resulting percentages seems redundant?</p>

	<p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: Recommend that the data is validated by gas gate to ensure that ICPs in areas where the retailer has low market share are read regularly.</p> <p>Vector: No</p>
Qn 6: Is the preference for meter reading information annually or monthly?	<p>Contact: More appropriate to run and submit the report monthly.</p> <p>Genesis: Would prefer to submit as a monthly report</p> <p>Mighty River Power: No comment</p> <p>Nova: Prefer monthly basis</p> <p>Powerco: No comment</p> <p>Vector: Either OK but preference is annually, to reduce the amount of reporting required on a monthly basis</p>
Qn 7: Any comments on GIEP24?	<p>Contact: No</p> <p>Genesis: Need guidance notes and principles to ensure that all participants produce the same information when providing this report. Also Rule 52 does not define how to offset the billed information with the submission information correctly, so that the report has value.</p> <p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: Would like to receive this file</p> <p>Vector: No</p>
Qn 8: Any comments on GIEP25?	<p>Contact: In the file header, remove UFG from the Rule for Submission Type and replace with Allocation.</p> <p>Genesis: No</p> <p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: No</p> <p>Vector: No</p>
Qn 9: Any comments on GIEP26?	<p>Contact: Is more appropriate for this report to include the UFG information included in GIEP31 rather than include it in the retailer allocation report, as it is the same data set across all retailers. Would mean that GIEP26 would have the Annual UFG factor together with the all Retailers UFG total for the month, the UFG % for the month; the UFG total for the previous 12 months and the UFG % for the previous 12 months (i.e. all UFG information is reported in a single file, with the retailer allocations separately reported in GIEP31).</p> <p>File details: UFG % should be expressed as 4 decimal places.</p> <p>Genesis: No</p>

	<p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: File format shows that GIEP26 is provided only to retailers, yet GIEP25 is provided to all reconciliation participants – Powerco assumes that all reconciliation participants will receive both files.</p> <p>Vector: No</p>
<p>Qn 10: Any comments on GIEP27?</p>	<p>Contact: The “Date of the Consumption Day” should be included in this report as required by the Rules (the present report format suggests monthly data, which is inconsistent with the Rules). As this is a daily report used for settlement purposes, the breakdown by Allocation Group is inappropriate and unnecessarily complicates the report. It is unnecessary to include Actual or Estimate. Recommend the removal of the Allocation Group and Actual or Estimate indicators.</p> <p>File name: GIEP27 should be named “Daily Retailer Allocation Report”.</p> <p>Re file header: Term UFG in the Rule for Report Type should be replaced by Allocation.</p> <p>Genesis: OK for distributors to receive GIEP27 for the areas for which they are the distributor.</p> <p>Mighty River Power: Appears that only a monthly total of the retailer gas allocations will be provided, but we consider that the daily quantities would be more appropriate</p> <p>Nova: No</p> <p>Powerco: GIEP20 and GIEP27 have the Allocation Group as 1 character, while GIEP21 and GIEP22 have 2.</p> <p>Vector: Should be provided to distributors to assist reconciliations of allocated volumes to energy volumes on which distribution charges have been calculated, thereby assisting to identify and reduce UFG</p>
<p>Qn 11: Any comments on GIEP28?</p>	<p>Contact: File header: term UFG should be removed from the Rule for Report Type.</p> <p>Genesis: No</p> <p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: No</p> <p>Vector: No</p>
<p>Qn 12: Any comments on GIEP29?</p>	<p>Contact: No</p> <p>Genesis: No</p> <p>Mighty River Power: No</p> <p>Nova: This is the key area that is going to create significant development work so development of processes for taking account of seasonality profiles needs to begin</p>

	<p>ASAP and working examples of files made available.</p> <p>Powerco: GIEP29 and GIEP30 have the file type as character 6 but the example has 7 characters.</p> <p>Vector: No</p>
<p>Qn 13: Any comments on GIEP30?</p>	<p>Contact: No</p> <p>Genesis: Should not be given to distributors. Provide instead to Gas Industry Co so it can monitor and take any action under the compliance regime</p> <p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: This file is useful for distributors that follow the Allocation Agent wash-up cycle to compare network billing wash-ups with initial submissions, as similar levels of variation should be evident.</p> <p>GIEP29 and GIEP30 have the file type as character 6 but the example has 7 characters.</p> <p>GIEP30 does not have the size of the field in the type for the number of records, this should be "Num (2)".</p> <p>Vector: Should be provided to distributors as will assist in identifying and minimising UFG (per comment on GIEP27).</p>
<p>Qn 14: Any comments on GIEP31?</p>	<p>Contact: Appropriate for distributors to receive modified report, but reports must be distributor specific.</p> <p>UFG detail should be removed from this report and included in GIEP26.</p> <p>Detail should also be modified to include Retailer Submission GJs as this would give an immediate comparison between the retailer submitted and the allocated volumes.</p> <p>File should also contain actual annual UFG factor used for the allocation together with data regarding the UFG allocated to the retailer (UFG Total; UFG %; UFG for month, etc).</p> <p>File header: Remove UFG and replace with Allocation in the Report Type Rule</p> <p>Genesis: No</p> <p>Mighty River Power: No</p> <p>Nova: No</p> <p>Powerco: No</p> <p>Vector: Should be provided to distributors as will assist in identifying and minimising UFG (per comment on GIEP27).</p>