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Sent via email: ian.wilson@gasindustry.co.nz

Dear Ian

Gas Industry Company role in GTAC code changes

First Gas welcomes the opportunity to comment on the Gas Industry Company's (GIC) consultation paper on the "Gas Industry Co role in Gas Transmission Access Code (GTAC) code changes".

We consider that the GTAC change process provides a mechanism that is flexible and independent. Our hope is that this process will be used to ensure the GTAC evolves and improves over time by adapting to changing industry conditions and remaining relevant and effective. Accordingly, we are pleased to see this paper that assists stakeholders in navigating the code change process.

We agree with the presentation of the GIC's role. The timeframes in the document are accurately presented. Given that a range of potential changes could come through the code change process, we feel it is appropriate for the GIC to allow for flexibility in its processes. We recognise that some code changes may take more time, and that the timeframes and process should be notified at the point where sufficient information is available on the nature of the change. We also agree that there may be times where due to the complexity of a change, the cost associated with assessment may be high. In this instance it would be appropriate for the GIC to discuss cost recovery from interested parties.

While the diagrams in the paper focus on the GIC role, we believe that there are details missing from Figure 3 that would assist parties in better understanding the code change process:

- **Step 6 "Change Request Submitted"**: It is important to note that if the Change Requestor does not submit the Change Request at this point (including revisions based on requests for further information and interested party views, and responses to objections), the Change Request is formally withdrawn; and
- **Steps 4 "Interested Party views" and "Change Request published"** are points where First Gas may indicate it does not support the Change Request.

Last year First Gas presented how we viewed our rights to decline to approve a Change Request under section 17.14 of the GTAC. Our position remains the same and is presented in this document: <https://www.gasindustry.co.nz/dmsdocument/6195> from the GTAC consultation process.

If you have any questions regarding this submission, please contact me on (04) 979 5368 or via email at karen.collins@firstgas.co.nz.

Yours faithfully



Karen Collins
Regulatory Policy Manager