

2 September 2020

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Dear Lucas

## Submission on the GIC's Options to Address Three TOU Submission Errors

### Introduction

1. This is Vector Limited's (Vector) submission on the Gas Industry Company's (Gas Industry Co) consultation paper, *Consultation on options to address three TOU submission errors*, circulated to stakeholders on 19 August 2020.
2. We set out below our comments on Gas Industry Co's options to address the TOU submission errors identified in the consultation paper which are in relation to the following under-submissions:
  - a. Genesis Energy - May 2020 under-submission
  - b. OnGas - May 2020 under-submission
  - c. Genesis Energy - May and June 2019 under-submissions.
3. No part of this submission is confidential, and we are happy for the GIC to publish it in its entirety.

### Genesis Energy – May 2020 under-submission

4. Vector agrees with Gas Industry Co's proposal to wait for the interim allocation to address any harm caused by this error, rather than undertake a special allocation as the interim allocation is only two weeks away, in mid-September 2020.

### OnGas – May 2020 under-submission

5. We agree with Gas Industry Co's proposal to direct a special allocation to address this under-submission. This is attributed in the consultation paper to an error in the OnGas system which "resulted in no usage being submitted for WKU16901 during May 2020".
6. Our gas trading business, OnGas, did submit gas usage data for May 2020 but with incorrect dates in the first column of the submission which recorded dates from April 2020, rather than May 2020. OnGas did not receive any error message or immediate feedback from Gas Industry Co of this error, so has not had the opportunity to make the necessary corrections or make them in a timely manner.
7. We are happy to work with Gas Industry Co to consider processes or mechanisms that can be put in place on either or both parties' systems to detect erroneous dates in a timely manner and help avoid similar errors in future submissions.


### Genesis Energy – May and June 2019 under-submissions

8. We agree with Gas Industry Co's proposal to direct a special allocation for these two under-submissions. The harm caused by these errors cannot be addressed by means other than a special allocation, given the final allocation for the relevant period occurred in June 2020.

### Contact details

9. Please contact Meenu Daniel (Senior Operational Analyst, Gas Trading) at 04 381 8024 or [Meenu.Daniel@vector.co.nz](mailto:Meenu.Daniel@vector.co.nz) if you have any questions or require further information.

Yours sincerely



**Jo Iggulden**  
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