



24 November 2017

Ben Gerritsen
GM Commercial and Regulation
First Gas Limited
By email

Dear Ben,

RE: CONSULTATION: Second Revised Draft GTAC (3rd draft GTAC)

This letter accompanies GGNZ's mark-ups on the 3rd draft GTAC. The approach to the mark-ups has been to:

- Go into a bit more detail on the low / medium level issues (which, incidentally, have yet to be workshopped or discussed), but generally:
 - Not repeat points previously made although we incorporate these points by reference and reserve the right to raise these points again in the future, and
 - Not mark-up anything related to the >50 action points on the ~12 material agenda items from the November workshops, as it is inefficient to scope solutions to these material design and workability problems in isolation and in a period of one week.
- Do a business review (and not a full legal review) due to the quantity and substance of outstanding action points from the November workshops.

GGNZ considered not marking-up the 3rd draft GTAC as it is nowhere near close to being a penultimate final draft (and the drafting appears worse than the previous version). That we did should not be taken as support for the 3rd draft GTAC. That we did not mark-up things as noted above should not be taken as support for those items. There are big issues to work through.

As the funnel continues to narrow, we encourage First Gas to readopt its own principles from SCOP1 and SCOP2 – particularly simplicity and transparency which for some unknown reason First Gas appears to have let slip.

First Gas will need future iterations of the GTAC to have a balance of power more towards centre and not overly in favour of First Gas, if the GTAC is going to have a realistic chance of being materially better than the status quo code arrangements.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Boxall', with a long horizontal flourish extending to the right.

Chris Boxall
Commercial Manager