

9 August 2017

Nova Energy Limited  
PO Box 10141, Wellington 6143  
[www.novaenergy.co.nz](http://www.novaenergy.co.nz)

Submissions  
Gas Industry Company Limited  
By email

**Re: First Gas change request re MPOC**

Nova has considered the conditions on which the MPOC is to terminate and be replaced by the new Gas Transmission Access Code (GTAC). Nova Energy supports the proposed change request to the Maui Pipeline Operating Code (MPOC), but believes that draft clause 22.16 (e) requires better definition.

Nova contends that First Gas should be confident enough to allow a third party review of the systems as a condition on the expiry of the MPOC.

Under the current drafting it is the TSP who “certifies” that the IT systems are “fit for purpose and ready to be put in production”.

There are no specific requirements in respect of what is required to meet the test of fit for purpose and ready to be put in production. There remains a risk that the system might be fit for purpose from the TSP’s perspective – but not users, particularly as there are no apparent consequences for the TSP if it provides the certification, and the system does not turn out to be fit for purpose.

Nova proposes there should be an obligation on the TSP to demonstrate to the GIC that the systems are fit for purpose from the users’ perspective as well as the TSP. This would require establishing that:

- a) the systems can be integrated into users IT environments (within reason), and
- b) users have available adequate technical and training support to be able to adequately use the system.

Subject to that provision, Nova believes the conditions on which the MPOC will terminate provide adequate protections for shippers and connected parties. In particular it notes clause 22.16 ‘following an appropriate consultation process which includes GIC publishing a draft determination and asking each shipper whether it supports the New Code’. This view is contingent on the GIC performing its role under the proposed MOU with First Gas (as proposed by Concept Consulting under its recommendation on the GTAC Governance Arrangements). We would therefore like to see the MOU in place before the final decision is made to incorporate this change to the MPOC.

Nova notes that the planned termination date for the Vector Transmission Code is 30 September 2018, and therefore the New Code Date cannot be before then.

Yours sincerely



Paul Baker

Commercial & Regulatory Advisor

P +64 4 901 7338 E [pbaker@novaenergy.co.nz](mailto:pbaker@novaenergy.co.nz)