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TRUSTPOWER SUBMISSION: FURTHER UPDATE TO GTAC TRANSITION CHANGE REQUEST

1 Introduction and overview

- 1.1.1 Trustpower Limited (**Trustpower**) thanks the Gas Industry Company (**GIC**) for the opportunity to submit on First Gas's further proposed change to the Maui Pipeline Operating Code (**MPOC**) change request, dated 14 July 2017 (**the GTAC Transition Change Request**).
- 1.1.2 The further proposed change would incorporate an additional procedural requirement for First Gas to publish the functional specification and data interface for the selected software 120 business days ahead of the expected Gas Transmission Access Code (**GTAC**) implementation date.
- 1.1.3 The change is intended to address the concerns of Shippers, raised during the formal consultation period on the GTAC Transition Change Request, that they will not have adequate information and time to make any necessary adjustments to their own systems prior to the new arrangements under the GTAC commencing.

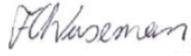
2 Trustpower's views

- 2.1.1 We are generally supportive of the proposal by First Gas and consider that explicitly recognising that Shippers need a reasonable period of time to make any adjustments to their IT systems, including user testing and training, is a sensible inclusion as an additional procedural requirement.
- 2.1.2 It would however be preferable for all procedural conditions to have been met 90 business days prior to "go live" as this would provide greater certainty to Shippers prior to undertaking potentially costly system development. As proposed, there is still a risk that First Gas may need to make changes to the functional specifications and data interface which would result in unnecessary additional costs to the market.
- 2.1.3 We note that it is likely to be a longer, more risky process for participants to adapt existing systems to be able to operate under the new arrangements, than for First Gas implementing a new system¹. It is important to the overall success of the GTAC that participants are given an opportunity to ensure they can physically operate under the new arrangements prior to their commencement.

¹ Allowing reasonable testing of key operational processes required to implement a change is specified in the Government's Expectations for good regulatory practice. Refer to <http://www.treasury.govt.nz/regulation/informationreleases/pdfs/good-reg-practice.pdf>

For any questions relating to the material in this submission, please contact me on 07 572 9888.

Regards,

A handwritten signature in black ink that reads "Fiona Wiseman". The signature is written in a cursive, flowing style.

Fiona Wiseman
Senior Advisor, Strategy and Regulation