

Template for submissions on the 8 December 2017 GTAC and guidance for submitters

Invitation for submissions

In Gas Industry Co's 11 December 2017 News Bulletin we invited stakeholders to provide submissions to assist Gas Industry Co make an assessment of whether the 8 December Gas Transmission Access Code (GTAC) is materially better than the current terms and condition of access to and use of the gas transmission pipelines. The deadline for submissions is **5.00pm on Monday, 15 January 2018**. Late submissions may not be considered.

Context

With the help of stakeholders, First Gas has developed the GTAC as a replacement for the existing Maui Pipeline Operating Code (MPOC) and Vector Transmission Code (VTC). First Gas hopes to introduce the GTAC on 1 October 2018.

The VTC will expire 30 September 2018 (unless extended), but the MPOC can only be replaced when the conditions set out in MPOC s22.16 are met. The substantive condition is that:

following an appropriate consultation process which includes GIC publishing a draft determination and asking each shipper and Welded Party whether it supports the New Code, GIC has published a final determination that the New Code is materially better than the current terms and conditions for access to and use of gas transmission pipelines having regard to the objectives in section 43ZN of the Gas Act 1992 and any objectives and outcomes the Minister has set in accordance with section 43ZO of the Gas Act 1992;

MPOC clause 22.16(b)

It is in relation to this condition that Gas Industry Co invites stakeholders to make submissions.

Timetable

Gas Industry Co published the following timetable for its assessment of the GTAC:

Process	Date
Stakeholders provide submissions to Gas Industry Co on the final GTAC submitted to Gas Industry Co on 8 December 2017	Monday, 15 January 2018
Gas Industry Co issues its preliminary assessment of the new GTAC (termed a "draft determination" in the MPOC) for consultation with stakeholders	Friday, 2 February 2018
Stakeholders provide submissions to Gas Industry Co on the preliminary assessment of the new GTAC	Friday, 2 March 2018

Guidance for submitters

You can express whatever views and provide whatever supporting information you consider relevant to Gas Industry Co's assessment of whether the proposed GTAC access arrangements are materially better than the current access arrangements (ie, the MPOC and VTC arrangements across the entire gas transmission system¹). However, it would be particularly helpful to our analysis if can explain how a move to the proposed GTAC arrangements would affect your business.

Ideally, your submissions should address the following matters:

1. To what extent is your company involved in any or all of the following:
 - a. Production
 - b. Treatment
 - c. Interconnection
 - d. Transport
 - e. Trading
 - f. End-use
2. What are the main aspects of the proposed GTAC access arrangements that are better than the current access arrangements, and why?
3. What are the main aspects of the proposed GTAC access arrangements that are worse than the current access arrangements, and why?
4. In responding to questions 2 and 3, it would help if you can identify which particular aspects of the GTAC are relevant, and what the practical effect on your business would be (more/less cost, more/less processes etc).
5. In assessing why some particular aspect of the GTAC is better or worse, it may help to consider how they may contribute to:

Efficiency

- Promoting the efficient use of gas pipelines to deliver gas to consumers
- Improving the incentives for investment
- Reducing barriers to competition
- Facilitating competition in upstream and downstream gas markets
- Increasing downward pressure on delivered gas costs and prices

¹ Although Gas Industry Co's assessment relates to the substantive condition in the MPOC, that condition refers to "...materially better than the current terms and conditions for access to and use of gas transmission pipelines...". The use of the plural makes it clear that the analysis is intended to encompass the total gas transmission system.

- Promoting access to essential infrastructure and competitive market arrangements
- Signalling the full costs of transporting gas to consumers
- Enabling consumers to make trade-offs between quality and price

Reliability

- Reducing the risk of interruption or contingency

Safety

- Reducing the risk of harm to people or property

Environment

- Reducing the likelihood of harm to the environment

Fairness

- Being more fair to industry participants

Suggested template for submissions

You may find a tabular format such as this useful:

Aspect	Why it is better or worse
Gas transmission products	
GTAC s2 Transmission Services	
GTAC s3 Transmission Products and Zones	
GTAC s7 Additional Agreements (Supplementary Agreements (SAs) and Interruptible Agreements (IAs))	
GTAC s4 Nominations	
Pricing terms	
GTAC s11 Fees and Charges	
System operation	
GTAC s5 Energy Quantity Determination	
GTAC s6 Energy allocations	
GTAC s7 Additional Agreements (Interconnection Agreements (ICAs))	
GTAC s8 Balancing	
GTAC s9 Curtailment	

GTAC s10	Congestion Management	
GTAC s12	Gas Quality	
GTAC s13	Odorisation	
Governance		
GTAC s14	Prudential Requirements	
GTAC s15	Force Majeure	
GTAC s16	Liabilities	
GTAC s17	Code Changes	
GTAC s18	Dispute Resolution	
Other matters		

Confidentiality

Please note that Gas Industry Co intends to publish all submissions that it receives. You should not upload any submission to our website that has confidential or commercially sensitive information.

If you wish to provide us with information that you consider to be confidential or commercially sensitive please contact Gas Industry Co to discuss.