



GREYMOUTH GAS

2 February 2018

Susan Dunne
General Manager Corporate Services
Gas Industry Company Limited
By email

Dear Susan,

RE: FY2019 Levy

Greymouth Gas refers to GIC's 'Consultation on Gas Industry Co FY2019 Work Programme and Levy'.

We recommend that additional funding is allocated to the GTAC programme, to allow for continued GIC involvement in that process, and to provide quality independent advisors and facilitators for any GIC-led process.

Our only other comment is on the proposed changes to the provision of information under the Levy Regulations. We support the principle underlying the changes – to ensure GIC has the best quality information before it to monitor levy compliance. However, we recommend the GIC convene an industry workshop before finalising this year's regulations. This will enable both industry and GIC to understand what is achievable and then to work together to ensure the requirements are encapsulated in a clear set of regulations. In particular, we believe the following issues should be considered:

- Requirements should treat all participants equally and should not result in excessive disclosures (e.g. to require the disclosure of all gas sales on all pipelines would include mass market customers, which is presumably not intended but may be inferred from current drafting); and
- First Gas' current invoicing timings create levy compliance issues for its customers, so we recommend this be taken into account in the new regulations.

Yours sincerely

Chris Boxall
Commercial Manager