



11 February 2019

Andrew Knight
Gas Industry Company
Po Box 10646
Wellington

Genesis Energy Limited
The Genesis Energy
Building
660 Great South Road
PO Box 17-188
Greenlane
Auckland 1051
New Zealand

T. 09 580 2094

Gas Industry Co FY2020 Work Programme and Levy

Genesis Energy Limited (**Genesis**) welcomes the opportunity to provide a submission to the Gas Industry Company (the **GIC**) on the consultation paper *Gas Industry Co FY2020 Work Programme and Levy* (the **consultation paper**) published in December 2018.

We do not have comments on the proposed levies and the forecast volumes appear reasonable. Our comments below recommend clearly prioritising the work programme to ensure gas continues to be delivered in a safe, efficient, fair, reliable and environmentally sustainable manner, as per the GIC's core objective.

In our view, priority should be given to the information disclosure workstream that has been requested by the Minister for Energy & Resources and other interested stakeholders, including Genesis. This has clearly emerged as a key issue following a period of extended electricity and gas market stress, and it is in the interest of the industry and its consumers to progress this project swiftly.

Our recent submission¹ on the *Electricity price review – First report* recommended improvements to the transparency of the wholesale market, including regarding the availability of gas. We consider a regime for disclosing information about the gas market is an important step in providing greater transparency, which will promote increased trust and confidence in the market, and is consistent with the GIC's accountability in the consultation paper to 'foster a well-informed market'.

We look forward to opportunities to work with other stakeholders and leverage industry expertise to deliver on the stated objectives of this project, and can see there is scope to take on board learnings from the electricity market as a useful starting point. This includes a role for the GIC and the Electricity Authority to promote a linked-up approach across industry regulators and participants on fuel-related disclosure obligations.

Genesis also looks forward to the new Gas Transmission Access Code receiving final approval and the process moving to its implementation phase. We are pleased to see the GIC raise areas of focus on ensuring a smooth transition; for example, in seeking alignment with current regulations.

If you would like to discuss any of these matters further, please contact me by email: margie.mccrone@genesisenergy.co.nz or by phone: 09 951 9272.

Yours sincerely

Margie McCrone
Senior Advisor, Government Relations and Regulation

¹ See Genesis Energy submission on [Electricity price review – First report](#).