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Andrew Knight  
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Dear Andrew

## GTAC: Preliminary Assessment Paper 5 December 2018

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Genesis Energy Limited (**Genesis**) welcomes the opportunity to provide a submission to the Gas Industry Company (the **GIC**) on the consultation paper *GTAC: Preliminary Assessment Paper 5 December 2018* (the **consultation paper**).

We support the revised Gas Transmission Access Code (**GTAC**) to replace the existing Vector Transmission (**VTC**) and Maui Pipeline Operating (**MPOC**) codes, and support the GIC to approve it as per the consultation paper.

We agree that, on the whole, the GTAC is materially better than the status quo arrangements. In our view, key benefits compared with the VTC and MPOC include the daily capacity product, auto-nomination service and single pipeline balancing. We also note the peaking regime has improved compared with the previous version of the GTAC.

We appreciate the extensive time and resource that GIC, First Gas Limited (**First Gas**) and industry stakeholders have devoted over the past two years to design new transmission arrangements that are robust and fit for purpose. We hope to see this same level of commitment during upcoming engagement on a gas disclosure regime.

Genesis now looks forward to the GTAC receiving final approval and the process moving into the implementation phase, during which we would like to be involved in other design matters e.g. priority rights auction rules, auto-nomination service development and the future park and loan facility.

We, like other stakeholders, would also like to understand the next steps regarding the IT system. We have some concerns regarding the short implementation timeframe and the pressure this places on stakeholders to embed new outputs and integrate platforms. An orderly transition is important in our view, so the more information that First Gas can provide on timeframes and next steps the better.

In the meantime, if you would like to discuss any of these matters further, please contact me by email: [margie.mccrone@genesisenergy.co.nz](mailto:margie.mccrone@genesisenergy.co.nz) or by phone: 09 951 9272.

Yours sincerely

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