



17 April 2019

Submissions
Gas Industry Company
Level 8, The Todd Building
95 Customhouse Quay
Wellington 6143
By email: info@gasindustry.co.nz

Options for information disclosure in the wholesale gas sector – Meridian submission

Meridian welcomes the Gas Industry Company's (GIC's) investigations into improving gas information disclosure. This submission supplements Meridian's earlier feedback provided on 30 March – reproduced at appendix B and in summary form below. Where we are able to do so, we've responded with feedback on specific consultation questions in appendix A.

Meridian does not operate in the gas sector. Our interest is in ensuring that confidence and efficiency in the electricity wholesale market is not compromised by poor transparency in respect of gas market operations. The two markets are interconnected and arrangements for information disclosures must begin to reflect this. As an enabler of increased efficiency, taking this step is also entirely consistent with broader consumer interests.

To achieve this alignment across the two markets, ultimately gas disclosure requirements that are the same as those under electricity wholesale market rules need to be worked towards. A principles-based regime, the electricity disclosure obligations hold all electricity participants to a common "material impact on prices" disclosure standard.¹ The Code provides only minimal

¹ More specifically clause 13.2A of the Code obliges electricity participants – as defined under Part 1 of the Code, and section 5 of the Electricity Industry Act 2010 – to make information readily available that:

- (a) is about the participant; and
- (b) is held about the participant; and
- (c) the participant expects, or ought reasonably to expect, if made available to the public, will have a material impact on prices in the wholesale market."

exceptions to this standard² and information where it is to be disclosed must be made readily available to the public free of charge. The electricity rules have proven to be workable for the sector and we see no legitimate reason why the same standards could not be met for gas.

We expect using an equivalent approach would encompass, at a minimum, all the broad categories of information identified by the GIC, i.e:

- planned and unplanned outage information (timing and scale) related to production, major gas user facilities, and transmission infrastructure – as soon as reasonably practicable for the disclosing party;
- emsTradePoint volume and price information (at no cost);
- wholesale prices and traded volumes (covering gas traded under bilateral contracts, brokered arrangements and the emsTradePoint market);
- medium term (one year) consumption forecasts; and
- forecast production information over the short term (one week) and medium term (one year) and if possible longer, given the potential importance of this information in relation to assessing electricity security of supply.

We suggest voluntary agreements to disclose at least some of this information are explored by the GIC with urgency. It was observable from the GIC's 27 March workshop that some level of willingness exists amongst upstream participants at least to further investigate what could be delivered voluntarily. Meridian would welcome immediate changes, even if only to provide a subset of the more extensive information required longer-term. For the avoidance of doubt, existing information must not in any way be diminished through the process of introducing new arrangements.

Our responses to selected consultation questions appended provide additional discussion on points raised above.

² Namely:

- (a) the disclosure information is excluded Code information (as defined in Part 1 of the Code); or
- (b) a reasonable person would not expect the disclosure information to be made readily available; or
- (c) the participant is bound by a legal obligation to keep the disclosure information confidential; or
- (d) making the disclosure information readily available to the public will be a breach of law; or
- (e) the disclosure information is already readily available to the public; or
- (f) the disclosure information concerns an incomplete proposal or negotiation; or
- (g) the disclosure information comprises matters of supposition or is insufficiently definite to warrant being made publicly available; or
- (h) the participant claims legal professional privilege or privilege against self-incrimination in respect of the disclosure information; or
- (i) the disclosure information is a trade secret.

Please contact me if you have any questions regarding this submission.

Yours sincerely



Alannah MacShane
Regulatory Analyst

DDI 04 381 1378

Email alannah.macshane@meridianenergy.co.nz

Options for information disclosure in the wholesale gas sector

Submission prepared by: Meridian Energy – Alannah MacShane, Regulatory Analyst

Question	Comment
<p>Q1: Should shippers be included in an information regime? If so, what information do you consider should be disclosed?</p>	<p>Yes.</p> <p>In line with wholesale electricity market arrangements, Meridian’s preference is that disclosure rules are framed broadly to target information:</p> <ul style="list-style-type: none"> a) pertaining to the participant; and b) with the potential to materially impact wholesale prices (for gas or electricity). <p>The GIC’s paper observes that shippers “do not own information that would materially affect the operation of the market”.³ Equivalent rules to the electricity sector therefore may be of no practical consequence for shippers but are still preferable for reasons of consistency and simplicity.</p>
<p>Q2: Is the information currently disclosed by the transmission pipeline operator sufficient? If not, what further information should be released through information disclosure arrangements?</p>	<p>Unsure.</p> <p>We agree with the GIC that the information supplied by First Gas provides good visibility over maintenance across the transmission network. This information forms only one element of the wider information needs of wholesale energy (gas and electricity) market participants, however. As previously indicated, we support a broad requirement on gas sector participants collectively to disclose information which may materially influence prices in the wholesale gas or electricity market.</p>

³ Refer page 5, ‘Options for Information Disclosure in the Wholesale Gas Sector’ – GIC Consultation Paper.

Question	Comment
<p>Q3: Have the upstream sector and its potential information issues been characterised appropriately? Have we missed aspects of the problem or are there parts of the identified problem that we have not described correctly? Please include details and any examples in your response.</p>	<p>Meridian agrees with the GIC’s assessment. It is apparent from the analysis that current arrangements fall far short of disclosure standards in the Australian market.</p>
<p>Q4: Have the demand-side and its potential information issues been characterised appropriately? Have we missed aspects of the problem or are there parts of the identified problem that we have not described correctly? Please provide details and any examples in your response.</p>	<p>Meridian agrees with the GIC’s assessment. Again, it is apparent that significant informational gaps exist, as compared against what is made available offshore and in relation to the NZ electricity market.</p>
<p>Q5: What processes does your organisation have to obtain information ahead of, and during, periods of reduced gas supply?</p>	<p>As a company operating outside of the gas market, Meridian is at a position of disadvantage in terms of our ability to determine where gas supply is reduced. In terms of information sources, we are highly reliant on disparate, publicly available options which are inefficient to access, and, in any event are often of limited assistance.</p>
<p>Q6: How is your organisation impacted during periods of reduced gas supply? Please provide details (including costs) and any examples in your response.</p>	<p>Periods of reduced gas supply can impact Meridian by virtue of the interrelationships between the gas and electricity markets. More specifically, lack of transparency and uncertainty as to the state of gas supplies can also prompt volatility in the spot and futures markets for electricity, impacting Meridian as a trader in those markets.</p>
<p>Q7: What steps does your organisation’s risk assessment or business continuity plan expect to be undertaken to limit the impact of periods of reduced gas supply?</p>	<p>The lack of certainty of gas drives on the electricity market forward contracting through the electricity futures and bilateral markets.</p>

Question	Comment
<p>Q8: Taking into account your risk assessments and business continuity plans, what information do you use and what further information would be useful to your organisation to inform your actions and decisions during periods of reduced gas supply?</p>	<p>As has already been mentioned, Meridian’s view is that information which has the potential to materially impact wholesale prices in the gas or electricity markets generally should be provided. Broadly this information would include (but not necessarily be limited to):</p> <ul style="list-style-type: none"> • planned and unplanned outages, covering timing and the level of curtailment; • current and historic gas flows; • current forward price curve, level of trading and level of depth; and • projected consumption and production.
<p>Q9: Is there any further information regarding outages that you would like to share?</p>	<p>No.</p>
<p>Q10: Have the potential information problems in the wholesale gas market been identified appropriately? Have we missed aspects of the problem or are there parts of the identified problem that we have not described correctly? Please provide details and any examples in your response.</p>	<p>Meridian agrees with the GIC’s assessment</p>

Question	Comment
<p>Q11: Have the potential information transparency and availability issues in the wholesale gas sector been analysed appropriately against the Gas Act and GPS objectives? Are there elements of the analysis that have been missed or parts of problem that have not been analysed properly? Please explain your reasoning.</p>	<p>The GIC tentatively concludes in its assessment that the arrangements currently “may not” achieve some of the objectives in the Gas Act and GPS.⁴ We believe this assessment can be taken a step further – that is to say that these objectives categorically are not being achieved currently.</p> <p>There are also broader considerations that need to be brought into the GIC’s assessments. More specifically interactions with the electricity market require a particular focus.</p>
<p>Q12: Has the proposed problem statement been characterised appropriately? Have we missed aspects of the problem or are there parts of the identified problem that we have not described correctly? Please include details and any examples in your response.</p>	<p>Refer Q11 response.</p>

⁴ Refer page 17, ‘Options for Information Disclosure in the Wholesale Gas Sector’ – GIC Consultation Paper. As per the GIC’s Appendix C summary, the principal policy objective for the GIC – specified in cl. 43ZN of the Gas Act 1992 “(a)...is to ensure that gas is delivered to existing and new customers in a safe, efficient and reliable manner.” “(b)... [in addition] other objectives are: (i) the facilitation and promotion of the ongoing supply of gas to meet New Zealand’s energy needs, by providing access to essential infrastructure and competitive market arrangements; (ii) barriers to competition in the gas industry are minimised; (iii) incentives for investment in gas processing facilities, transmission, and distribution are maintained or enhanced; (iv) delivered gas costs and prices are subject to sustained downward pressure; (v) risks relating to security of supply, including transport arrangements, are properly and efficiently managed by all parties; (vi) consistency with the Government’s gas safety regime is maintained.”

The GPS identifies the following over-arching aim: “To ensure that gas is delivered to existing and new customers in a safe, efficient, fair, reliable and environmentally sustainable manner” and incorporates the following as supplementary objectives:

“a) Energy and other resources used to deliver gas to consumers are used efficiently;
b) Competition is facilitated in upstream and downstream gas markets by minimising barriers to access to essential infrastructure to the long-term benefit of end users;
c) The full costs of producing and transporting gas are signalled to consumers;
d) The quality of gas services where those services include a trade-off between quality and price, as far as possible, reflect customers’ preferences; and
e) The gas sector contributes to achieving the Government’s climate change objectives as set out in the New Zealand Energy Strategy, or any other document the Minister of Energy may specify from time to time, by minimising gas losses and promoting demand-side management and energy efficiency.”

Question	Comment
<p>Q13: Has the voluntary disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response.</p>	<p>We agree with the GIC's characterisation.</p>
<p>Q14: Do you agree with the advantages that have been identified for the option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised?</p>	<p>Meridian agrees with the GIC's assessment.</p>
<p>Q15: Do you agree with the disadvantages that have been identified for the option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised?</p>	<p>We believe the potential draw backs are as the GIC describes.</p>
<p>Q16: Given the advantages and disadvantages, do you consider that voluntary disclosure option is a viable option? Please provide the reasoning behind your answer, including details and any examples.</p>	<p>Meridian's view is that the GIC must actively work with participants to take the voluntary option forward. The GIC's high-level analysis does not give any valid grounds for not doing so.</p>
<p>Q17: Has the principles-based information disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response.</p>	<p>We agree with the GIC's characterisation.</p>
<p>Q18: Do you agree with the advantages that have been identified for the option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised?</p>	<p>Meridian agrees with the GIC's assessment.</p>
<p>Q19: Do you agree with the disadvantages that have been identified for the option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised?</p>	<p>We believe the potential drawbacks with a principles-based approach are as the GIC describes. This has proven to be a workable approach for the electricity sector however.</p>

Question	Comment
<p>Q20: If a principles-based information disclosure option is adopted do you think there should be exclusions on information that is disclosed? If so, what types of exclusion should be considered and why? If confidentiality is a concern, please explain why this is the case, including any details and examples.</p>	<p>Meridian believes, consistently with what we've said above, that exclusions should mirror those available in the electricity sector.</p>
<p>Q21: Has the specific information disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response.</p>	<p>Meridian agrees with the GIC's characterisation.</p>
<p>Q22: Do you agree with the advantages that have been identified for the option? Have any other advantages been missed or are there advantages that have been listed that are mischaracterised?</p>	<p>Meridian agrees with the GIC's assessment.</p>
<p>Q23: Do you agree with the disadvantages that have been identified for the option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised?</p>	<p>We believe the potential drawbacks with a specific information disclosure approach are as the GIC describes.</p>
<p>Q24: Have the implementation issues associated with the information disclosure options been characterised appropriately? Are there further points that we have missed or are there issues that have been mischaracterised?</p>	<p>Meridian agrees with the GIC's characterisation.</p>
<p>Q25: Do you think that principles-based information disclosure based on industry-led arrangements is a viable option? Please provide the reasoning behind your answer.</p>	<p>As per our Q16 response, Meridian's view is that the GIC must actively work with participants on what can be achieved under a voluntary approach. We see no reason why a principle-based approach should not be further investigated through this process.</p>
<p>Q26: Do you agree with the proposed coverage for disclosure obligations? What issues do you see with the proposed coverage?</p>	<p>Meridian's view is that disclosure obligations need to extend to all participants with material information. This will ensure alignment with electricity Code rules.</p>

Question	Comment
<p>Q27: Should there be coverage exclusions (i.e. particular parties or types of party) included in the information disclosure regime? If so, what should they be and why (please provide details and examples to support your argument)?</p>	<p>No.</p>
<p>Q28: Should there be a minimum threshold? If so, what should it be and what should it be based on (e.g. nameplate capacity, X GJ/day)? Should the minimum threshold be the same for all types of market participants or should it vary between market segments? Please provide details.</p>	<p>No.</p>
<p>Q29: Should the threshold be on a facilities basis or company basis?</p>	<p>Meridian does not support either option.</p>
<p>Q30: Are there any other information disclosure rules that should be considered? Please provide details in your answer including the rationale for your proposed rules.</p>	<p>Meridian believes the high-level options have been correctly identified.</p>
<p>Q31: Has this planned outage disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response.</p>	<p>We believe this option has been identified correctly.</p>
<p>Q32: Do you agree with the advantages that have been identified for the planned outage disclosure option? Have any other advantages been missed or are there advantages that have been listed that are mischaracterised?</p>	<p>Meridian agrees with the GIC's assessment.</p>
<p>Q33: Do you agree with the disadvantages that have been identified for the planned outage disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised?</p>	<p>Meridian believes the potential drawbacks are as the GIC describes. With carefully designed and standardised processes for collecting information, we question whether information collection costs will be material.</p>

Question	Comment
<p>Q34: If this planned outage disclosure option is adopted do you think there should be exclusions on information that is disclosed? If so, what types of exclusion should be considered and why? If confidentiality is an issue, please explain why this is the case, including any details and examples.</p>	<p>No. Extensive planned outage information is made available within the electricity market – as outlined in the appendix C example attached. We see no reason why arrangements for gas should be any different.</p>
<p>Q35: Has this unplanned outage disclosure option been identified appropriately? Are there alternative versions of the option that are worthy of consideration? Please provide reasons in your response.</p>	<p>We believe this option has been correctly identified.</p>
<p>Q36: Do you agree with the advantages that have been identified for the unplanned outage disclosure option? Have any other advantages been missed or are there advantages that have been listed that are mischaracterised?</p>	<p>Meridian agrees with the GIC’s assessment.</p>
<p>Q37: Do you agree with the disadvantages that have been identified for the unplanned outage disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised?</p>	<p>Refer Q33 response.</p>
<p>Q38: If this unplanned outage disclosure option is adopted do you think there should be exclusions on information that is disclosed? If so, what types of exclusion should be considered and why? If confidentiality is an issue, please explain why this is the case, including any details and examples.</p>	<p>Refer Q34 response.</p>
<p>Q39: Should lagged emsTradePoint traded volumes and prices be disclosed under an information disclosure regime? Please provide reasons in your response.</p>	<p>Yes – this will improve alignment with electricity sector arrangements and support improved transparency for participants across the wider energy sector. As an outcome, disclosure of this information will also more generally promote efficiency and consumer interests.</p>
<p>Q40: Do you agree with the advantages that have been identified for the emsTradePoint disclosure option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised?</p>	<p>Meridian agrees with the GIC’s assessment.</p>

Question		Comment
Q41:	Do you agree with the disadvantages that have been identified for the emsTradepoint disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised?	Meridian believes the potential drawbacks are as the GIC describes. Given emsTradepoint information has been made available free of charge in the past, this indicates any disadvantages are not insurmountable however. The availability of extensive electricity spot price market information via WITS 'Free to Air' suggests the same.
Q42:	Should there be publication of weighted average wholesale prices & aggregate traded volumes that cover the entire gas wholesale sector (with data sources including price and volume information covered under bilateral agreements and other arrangements)?	Yes – with contractual supply agreements accounting for over 90% of market trading (by volume) this will support significantly improved transparency for participants across the energy sector generally.
Q43:	Do you agree with the advantages that have been identified for this weighted average price & volumes option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised?	Meridian agrees with the GIC's assessment.
Q44:	Do you agree with the disadvantages that have been identified for this weighted average price & volumes disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised?	Meridian believes the potential drawbacks are as the GIC describes. With anonymised information on reference prices and contract volumes made available in respect of electricity hedges, however, we see no legitimate reason why this could not be replicated for gas.
Q45:	Are there confidentiality issues that would limit this option? Please provide details on any confidentiality concerns.	Meridian is not in a position to comment.
Q46:	Should a twelve-month outlook for gas production information ('gas production information') be disclosed under an information disclosure regime? Please provide reasons in your response.	Yes – this will support improved transparency for participants across the wider energy sector. As an outcome, disclosure of this information will also more generally promote efficiency and consumer interests.
Q47:	Do you agree with the advantages that have been identified for this 'gas production information' disclosure option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised?	Meridian agrees with the GIC's assessment.

Question	Comment
Q48: Do you agree with the disadvantages that have been identified for this 'gas production information' disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised?	Meridian believes the potential draw backs are as the GIC describes. As the GIC suggests, however, some level of aggregation could be looked to as a means of overcoming any confidentiality concerns. With carefully designed, standardised processes for collecting information, we question whether information collection costs will be material.
Q49: Are there confidentiality issues that would limit this 'gas production information' disclosure option? Please provide details and any examples.	Meridian is not in a position to comment.
Q50: Should a twelve-month outlook for major users' gas consumption information ('gas consumption information') be disclosed under an information disclosure regime? Please provide reasons in your response.	In principle yes – this will support improved transparency for participants across the energy sector generally. As an outcome, disclosure of this information will also more generally promote efficiency and consumer interests.
Q51: Do you agree with the advantages that have been identified for this 'gas consumption information' disclosure option? Have any other advantages been missed or are there advantages that have been listed that mischaracterised?	Meridian agrees with the GIC's assessment.
Q52: Do you agree with the disadvantages that have been identified for this 'gas consumption information' disclosure option? Have any other disadvantages been missed or are there disadvantages that have been listed that are mischaracterised?	Refer Q44 response.
Q53: Are there confidentiality issues that would limit this 'gas consumption information' disclosure option? Please provide details and any examples.	Meridian is not in a position to comment on this question.
Q54: Have any publication channels been left out of the identified channel list? Are there channels in the list that should be excluded? Please provide details in your response.	We believe the potential channels have been correctly identified.

Question	Comment
<p>Q55: What do you consider to be the pros and cons of the various options that have been identified and other options that should be considered?</p>	<p>Meridian’s initial preference is that information is disclosed using the GIC’s website (via new webpages) or potentially a First Gas exchange as a central platform. We suspect these options will provide the fastest routes for implementation.</p> <p>Whatever option is chosen, the information disclosed needs to be made available in a usable, downloadable format.</p>
<p>Q56: Have you got any comments on the benefits analysis?</p>	<p>We support the general approach adopted by the GIC in its assessment but are not in a position to give specific detailed feedback, given its predominant gas-sector focus.</p> <p>While outside of the scope of the GIC’s assessment, broader energy sector wide benefits provide additional impetus to implementing new disclosure standards.</p>
<p>Q57: Could you please provide Gas Industry Co with estimates of your expected costs associated with the implementation and ongoing management of the various information disclosure options? This cost information is important for completing a full cost/benefit analysis.</p>	<p>N/A.</p>



Appendix B – Previous Meridian feedback

29 March 2019

Andrew Knight
Gas Industry Company
Level 8, The Todd Building
95 Customhouse Quay
Wellington 6143
By email: andrew.knight@gasindustry.co.nz

Dear Andrew

Gas Market Information Disclosure

Meridian is pleased to see the Gas Industry Company (GIC) is considering improvements to information disclosure in the gas market. We are however concerned that the current GIC timeframe for actually making those improvements is too slow.

Meridian will in due course submit a detailed response on the GIC's *'Options for Information Disclosure in the Wholesale Gas Sector'* consultation paper. However, given the importance of improving gas information disclosure we wanted to get this letter to you now to suggest some immediate steps the GIC could take to make improvements, and urge you to take those steps. The goal for the GIC and / or policy makers should be to align disclosure requirements across the electricity and gas sectors as soon as possible, with the relevant test or rule being the same – i.e. that there should be disclosure of information that a participant expects or ought reasonably to expect will have a material impact on prices. Achieving this goal will improve confidence in the gas market and in the electricity market to the benefit of all suppliers and purchasers of energy. Conversely, delay in achieving this goal will over time result in potential damage to the credibility of the GIC and to gas and electricity markets more generally.

The current state of production and supply in the gas market and the prices paid for gas are, as you know, a key input to electricity prices in the spot market and in the futures market. Lack of transparency in the gas market and the resulting uncertainty this drives, is in our view a major cause

of the ongoing price volatility and widened bid ask spreads seen in the electricity futures market since late last year. We are aware that the Minister, the Electricity Price Review (EPR) Expert Advisory Panel and the Electricity Authority have also expressed concerns. The Minister's letter of 25 July 2018 referred to "information disclosure requirements for gas industry participants" being "insufficient." The Price Review Panel has referenced submissions about the problems with limited availability of information about gas supplies, and the Electricity Authority's recent UTS report, although finding no UTS, also concluded that inadequacies in gas supply information warranted further attention.

One solution proposed by the EPR Panel is the establishment of a single electricity and gas regulator that could "develop and enforce regulations for both industries in a more consistent and coherent way, which would reduce uncertainty". In response to this we said in our EPR submission that:

Meridian is neutral provided that immediate steps are taken to address the current information asymmetry in relation to gas market information disclosure. We are concerned this is having an ongoing detrimental effect to the operation of the electricity market and support the Authority and Gas Industry Company's (GIC's) efforts to ensure greater transparency. If those efforts are unsuccessful or fail to proceed quickly enough the issue of a joint regulator would need to be looked at. We note that the current GIC consultation seems unlikely to produce any improvements in disclosure prior to 2020. Meridian believes this is not quick enough.

A related option being considered by the EPR Panel is the introduction of mandatory market-making in the electricity futures market. Currently four parties provide market-making services on a voluntary basis. Meridian does not favour the proposed mandatory market-marking as we believe other options, based on evolution of the current arrangements, are likely to be more efficient and deliver a better long-term solution, with lower costs to consumers. We submitted to the EPR that it is imperative that any steps to improve market-making need to be accompanied by strong steps to improve gas market disclosure. If the underlying issue or problem is that gas market uncertainties are driving widened spreads in the electricity futures market, then it doesn't seem reasonable for policy makers to simply decree that electricity market-makers must hold tight spreads, and potentially incur significant losses to gas market information insiders, without also taking steps to ensure those insiders share the information they have.

The gas market information that we would like to see starting to be publicly disclosed very soon would be anything that a participant expects or ought reasonably to expect will have a material impact on prices in the gas market or the electricity market. In terms of the potential information issues outlined in the GIC's consultation paper this would include all of the categories of information identified:

- planned and unplanned outage information (timing and scale) related to production and major gas user facilities;
- emsTradePoint volume and price information (such information has sat behind a paywall since April 2018);
- wholesale prices and traded volumes (covering gas traded under bilateral contracts, brokered arrangements and the emsTradePoint market)
- medium term (one year) consumption forecasts; and
- forecast production information over the short term (one week) and medium term (one year) and if possible longer – we note the GIC's paper references the potential importance of this information in relation to assessing electricity security of supply.

We expect that voluntary agreement to disclose at least some of this information would not be too difficult to negotiate with gas market participants, with the relevant information then disclosed on the GIC website. We suggest the GIC should explore urgently with gas market participants what can be achieved and what they believe they could commit to.

At the same time Meridian will engage with both the Electricity Authority and with MBIE to see what steps could be taken to expedite a regulated solution. I am aware that the GIC's response to the Minister's letter of 25 July 2018 indicated that amendments to the Gas Act might be necessary to enable the making of regulations mandating disclosure. If that is correct then potentially the quickest way forward might be to write the necessary rules directly into the Gas Act. Separately the Electricity Authority will have jurisdiction over a number of current gas market participants by virtue of them also being participants in the electricity market. Amendments to the Electricity Industry Participation Code may also assist in improving gas market disclosures.

I would like to discuss these issues with you in person and will ask my team to contact you to set up an appropriate time.

Yours sincerely

Neal Barclay
Chief Executive

Email neal.barclay@meridianenergy.co.nz

cc James Stevenson-Wallace, Chief Executive, Electricity Authority

Miriam Dean, CNZM QC, Chair, Electricity Price Review Expert Advisory Panel

Phillippa Fox, General Manager Energy and Resource Markets, MBIE

Appendix C – Planned Outage Co-ordination (POCP) Reporting Example

POCP
Search
Calendar
Links
Help
NZGB
Log In

Outage Block

Outage ID:

Active: to
 4 Weeks(s) from today

GXP/GXPs:

Group:

Region:

Owners

- Comalco
- Contact Energy
- ENA
- Genesis
- MEUG
- Meridian
- Mighty River
- Nova Energy
- PowerCo
- Powernet
- Top Energy
- Transpower
- Trustpower

Planning

- Tentative
- Confirmed
- Cancelled
- Completed

Category

- Generation
- Transmission
- Direct Connection
- Distribution
- Embedded Generation

Sort by start time

[Search](#)

Prev 1 2 3 4 5 6 7 8 9 10 11 Next Showing 251 to 300 of 717

Outage Block	Group	Start	End	Type	Owner	Planning	MW Remain	MW Loss	MVar	GXP/GXPs	Category	Modified
PEN_RTU_2		18 Apr 2019 10:00	18 Apr 2019 16:00	daily	Transpower	confirmed	n/a	n/a	n/a	PEN	transmission	17 Jan 2019
KAB_STN		18 Apr 2019 11:30	18 Apr 2019 13:00	continuous	Mighty River	confirmed	72.00	34.00	unknown	KAW	generation	19 Oct 2018
ROT_STN		20 Apr 2019 23:30	21 Apr 2019 01:30	continuous	Trustpower	tentative	unknown	19.00	unknown	ROT	generation	18 Sep 2018
KAL_SBK_1		23 Apr 2019 07:30	24 Apr 2019 17:30	continuous	Transpower	confirmed	n/a	n/a	n/a	KAL_SBK	transmission	4 Mar 2019
CHK_3		23 Apr 2019 08:00	23 Apr 2019 16:00	continuous	Mighty River	confirmed	unknown	26.50	unknown	CHK	generation	29 Mar 2019
RDF_WTU_GXP_TIE		23 Apr 2019 08:30	23 Apr 2019 16:30	daily	Transpower	confirmed	n/a	n/a	n/a	RDF_WTU	transmission	3 Apr 2019
ASB_RTU_1		23 Apr 2019 09:00	23 Apr 2019 11:00	daily	Transpower	confirmed	n/a	n/a	n/a	ASB	transmission	21 Feb 2019
ASB_RTU_2		23 Apr 2019 09:00	23 Apr 2019 11:00	daily	Transpower	confirmed	n/a	n/a	n/a	ASB	transmission	21 Feb 2019
CST_T2		24 Apr 2019 07:30	24 Apr 2019 18:30	daily	Transpower	confirmed	n/a	n/a	n/a	CST	transmission	28 Feb 2019
MAN_3		24 Apr 2019 07:30	24 Apr 2019 16:00	continuous	Meridian	confirmed	unknown	121.50	unknown	MAN	generation	9 Apr 2019
ARA_3		24 Apr 2019 08:00	24 Apr 2019 16:00	continuous	Mighty River	confirmed	unknown	26.00	unknown	ARA	generation	15 Apr 2019
KPU_FDR_1102		24 Apr 2019 08:30	24 Apr 2019 17:30	daily	Transpower	confirmed	n/a	n/a	n/a	KPU	transmission	19 Mar 2019
OHA_STN		24 Apr 2019 10:00	24 Apr 2019 14:00	continuous	Meridian	confirmed	unknown	172.00	unknown	OHA	generation	22 Mar 2019
OHA_4		24 Apr 2019 10:00	24 Apr 2019 14:00	continuous	Meridian	confirmed	unknown	66.00	unknown	OHA	generation	15 Apr 2019
SFD_22		25 Apr 2019 02:00	3 May 2019 19:00	continuous	Contact Energy	confirmed	unknown	100.00	unknown	SFD2201	generation	6 Mar 2019