

11th March 2020

To: Andrew Knight

Gas Industry Company

PO Box 10-646

Wellington 6143

via email: info@gasindustry.co.nz

Dear Andrew,

RE: Information Disclosure Problem Assessment - Cross-Submission Issues

emsTradePoint welcomes the opportunity to submit on the consultation paper 'Information Disclosure Problem Assessment- Cross-Submission Issues.'

Our position on information disclosure is unchanged from that expressed in our previous submissions.

A well-functioning and efficient gas market, is one in which participants can make informed decisions based on full and relevant information disclosure.

Yours sincerely,



Quintin Tahau
General Manager
emsTradePoint Limited



Q1: Contract price and volume information:

emsTradePoint recognises that including bilateral agreements will be contentious. However, it is still our preference to include this information if it can be disclosed in a way that is meaningful while maintaining confidentiality. Bilateral contracts make up most of the traded volume, include this information in the Statement of Proposal (SOP) to establish whether meaningful information can be created.

Q2: Forecasts of major users' gas consumption:

No further points to make on this element.

Q3: Major gas user facility outages:

We have previously submitted that the publication of outage (planned and unplanned) information should be included in the SOP. The GIC has mentioned that in reviewing other market practices that 'outage information is disclosed in all markets' they reviewed, a prime example of this is the New Zealand electricity market where major electricity users provide outage information to Transpower's outage planning team.

No further points to add.