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GIC Information Disclosure Problem Assessment

We appreciate the opportunity to respond to the problem assessments analysis for gas market information disclosure. Our focus is on the assessment of the gas production and gas storage outages.

For question 3, we agree with the GIC’s problem identification assessment for gas production outage information and with its conclusion “that gas production outage information should be included in a Statement of Proposal for information disclosure in the gas wholesale market (page 21).

For question 5, we also support the analysis and conclusion that outages of storage facilities create similar issues to gas production outages. Therefore, we support storage outage information to be included as an information element in a Statement of Proposal for information disclosure in the gas wholesale market.

Following the GIC’s thorough and complete analysis of the information problems, in our view the development of the disclosure regime for production and storage outages should now be expedited to support confidence in New Zealand’s overall energy security.

We urge that the GIC publishes a timeline for complementation of outages information disclosure and remain available for any assistance you may need in the design phase.

Yours sincerely

John Clarke
General Manager Operations