

4 February 2025

Electricity Authority

PO Box 10041

Wellington 6143

Submission on the Electricity Authority's Improving access to thermal fuel information consultation

Thank you for the opportunity to submit on the Improving access to thermal fuel information consultation.

Based on the feedback we have received during the implementation of the Gas (Facilities Outage Information Disclosure) Rules 2022, Gas Industry Co is supportive of the EA's approach presented in the consultation.

We are encouraged to see that the EA is taking steps to increase information quality and accessibility of fuel supply information to improve electricity market transparency, the system operator's ability to produce accurate Electricity Risk Curves and the EA's ability to monitor participants' wholesale market information disclosure obligations as well as trading conduct.

Gas Industry Co believes that the shift from a partially principle-based approach to a prescribed obligation to timely disclose generators' specific thermal fuel information is an important step to improve the regulatory framework to enhance confidence in the market.

Comments on the consultation

Responses to specific consultation questions are appropriately the domain of other interested parties.

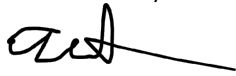
However, we wish to respond to parts of the consultation which are gas related. Our two comments are of minor nature and for the purpose of clarification:

- 4.28 and 5.21 Gas Industry Co is now being provided with daily data from the Ahuroa Gas Storage facility and actual daily gas storage information is available on our website <https://www.gasindustry.co.nz/data/gas-storage/>
- 5.52 and p28 To future proof the regime, Gas Industry Co suggests that including a reference to the Gas Act's definition of "gas" (sec 2(1) of the Gas Act) would ensure that all gases including biogas, hydrogen and LNG are captured.

Nothing in this submission is confidential.

Thank you again for the opportunity to submit. If you have any questions, please get in touch with Alex Ehler at alex.ehler@gasindustry.co.nz .

Yours sincerely

A handwritten signature in black ink, appearing to be 'Alex Ehler', with a long horizontal line extending to the right.

Alex Ehler

Principal Adviser

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