



Our ref: ENNZ-C/DR/003206

1 September 2020

By email to: WMID@ea.govt.nz

OMV Upstream

Electricity Authority
Level 7, Harbour Tower
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Submission on Review of Thermal Fuel Information Disclosure

OMV New Zealand Limited (OMV) welcomes the opportunity to make a submission on the *Review of Thermal Fuel Information Disclosure* ('Review').

OMV operated ventures currently produce around 50% of total New Zealand gas via the Maui and Pohokura gas-condensate fields. OMV itself produces more than 40% of the total New Zealand natural gas production and a significant proportion of total New Zealand condensate production. The company directly employs some 350 staff.

OMV supports the Review proposals related to improved application and transparency of disclosures under the existing rules as it is appropriate that the market has visibility on the 'quantity available to generate'. Equally, we support the view that disclosure of key terms from fuel supply agreements is inappropriate "at this time" and do not foresee a scenario whereby such a disclosure would become appropriate.

OMV is mindful of any new costs imposed on thermal generators that may lessen the competitiveness of thermal generation compared to other forms of generation. While OMV is not directly impacted by any new compliance costs associated with the proposed changes, we would be sympathetic to any proposals made by those impacted that reduce the cost of compliance and hope that such proposals (if they eventuate) will be duly considered.

Yours sincerely

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