

9 May 2017

Rhianne Ogilvie  
Senior Analyst, Regulation Branch  
Commerce Commission  
44 The Terrace  
WELLINGTON

Sent via email: [regulation.branch@comcom.govt.nz](mailto:regulation.branch@comcom.govt.nz)

Dear Rhianne

## Proposed fast track amendments to information disclosure determinations

This is the First Gas submission on the Commerce Commission's "Proposed fast track amendments to information disclosure determinations for First Gas gas pipeline services 2017" draft companion paper ("draft paper") dated 26 April 2017.

### Support alignment of regulatory obligations for First Gas

First Gas welcomes the Commission's decision to amend the information disclosure determinations to align the disclosure years for First Gas's transmission and distribution businesses with effect from 1 October 2017. Enabling consistent disclose years (all ending 30 September) will align our ID requirements with our pricing year under the upcoming Default Price-quality Paths (DPPs) and First Gas's financial year. The alignment of disclosure years for all parts of the business will also remove the need for future exemptions, will increase reporting efficiency and will provide greater clarity for our customers.

First Gas has reviewed the draft determinations for both gas distribution businesses (GDBs) and gas transmission businesses (GTBs) and we are comfortable that the proposed amendments will enable the changes sought by the Commission.

If you have any questions regarding this submission, please contact me on 04 979 5368 or via email at [karen.collins@firstgas.co.nz](mailto:karen.collins@firstgas.co.nz).

Yours sincerely



**Karen Collins**  
Regulatory Manager