

28 July 2017

Rhianne Ogilvie
Senior Analyst, Regulation Branch
Commerce Commission
44 The Terrace
WELLINGTON 6140

Sent via email: regulation.branch@comcom.govt.nz

Dear Rhianne

Proposed amendments to information disclosure determinations

This is First Gas' submission on the Commerce Commission's consultation paper "Proposed amendments to information disclosure determinations for airport services, electricity distribution services, and gas pipeline services" dated 30 June 2017.

Comfortable with general amendments to enact IM review decisions

We have reviewed the consultation paper and support:

- the consequential amendments to the gas transmission and distribution businesses' Information Disclosure (ID) determinations arising out of decisions made in the 2016 Input Methodologies (IM) review; and
- the amendments to make administrative and cross-reference updates to the ID determinations.

We consider that it is important that there is consistency between the IDs and IMs that apply to regulated businesses. This assists regulated businesses when compiling and disclosing the required information, and aids interested parties when reviewing the disclosed information.

Concerns with proposed RAB information sought by asset class

We have serious concerns with the Commission's proposal to require gas transmission and distribution businesses to disclose the closing Regulated Asset Base (RAB) value of each asset class at the end of each disclosure year (Schedule 9a).

We appreciate that this information may be of value to interested parties, and to the Commission for asset analysis in future years. However, we have serious reservations about whether we could provide RAB information broken down by the asset class categories outlined in Schedule 9a. We do not have historic information down to this level of detail, which would meet the level of accuracy sought via ID determinations.

We would like to meet with Commission staff to discuss what level of asset information is currently available through our systems, and what alternative level of information could be disclosed to meet the Commission's needs.

To set up this meeting, please contact me on 04 460 2548 or via email at karen.collins@firstgas.co.nz.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Collins', with a long horizontal flourish extending to the right.

Karen Collins
Regulatory Manager