

14 November 2017

Matthew Clark
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Commerce Commission
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Sent via email: regulation.branch@comcom.govt.nz

Dear Matthew

Input methodologies review: CPP information requirements for gas

First Gas welcomes the opportunity to cross-submit on the Commerce Commission's consultation paper "Input Methodologies review draft decisions: CPP information requirements for gas pipeline businesses" dated 24 October 2017.

The Commission has released a draft decision not to make any amendments to the CPP information requirements for gas pipeline businesses (GPBs). This draft decision is based on the fact that no GPBs have applied for a CPP, and a review of the requirements would be more effective after the current rules have been tested through a CPP application. We generally agree with this approach, particularly given that we are currently exploring the CPP option for completing the realignment of gas transmission pipelines at White Cliffs.

Our submission noted that while deferring any substantive review of CPP requirements makes sense, we do see merit in adopting the changes recommended by both Powerco¹ and Vector² - to change the CPP information requirements to ensure greater consistency with the Information Disclosure Determination. Our support for those proposals is based on any changes being relatively minor and technical in nature, with limited impact on GPBs currently considering a CPP application. If such changes are more substantive, then we consider they would best be dealt with as part of a future review.

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

Yours sincerely



Karen Collins
Regulatory Manager

¹ Page 2 of Powerco submission, 7 November 2017.

² Paragraphs 3 – 4, Vector submission, 7 November 2017.