

4 November 2019

Petroleum Exploration & Production Association New Zealand  
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Sent via email: Joshua@pepanz.com

Dear Joshua

## Upstream Gas Outage Information Disclosure Code 2019

Firstgas Group Limited welcomes the opportunity to comment on the draft "Upstream Gas Outage Information Disclosure Code 2019" (draft Code) released on 17 October 2019." We are making this submission on behalf of Firstgas' gas transmission and distribution businesses, and Flexgas, the operator of the Ahuroa Gas Storage facility.

We support the introduction of the draft Code as it addresses one of the main information gaps in the gas market.<sup>1</sup> Disclosures around planned and unplanned outages by large upstream gas producers will help provide timely information that should help to build confidence in a well-functioning and transparent gas market.

As outlined in our April 2019 submission to the Gas Industry Company (GIC), we support the introduction of a prescriptive regulatory solution for information disclosure in the gas market. While the draft Code does not have the force of regulation, it does have an appropriate level of prescription that defines what information should be disclosed. The draft Code is therefore a positive step. We also support the proposal of a full Code review after 12 months of operation to assess adoption of the voluntary code and how the information disclosed has been received by market participants. The outcomes of the review will be valuable for the GIC's workstream on information disclosure.

Flexgas is committed to ensuring we fulfil our obligations under this Code and we are satisfied that the draft Code in its current format provides a good mechanism for information disclosure on the operation of the Ahuroa gas storage facility.

If you have any questions regarding this submission, please contact me on 0272901861 or via email at [william.hancock@firstgas.co.nz](mailto:william.hancock@firstgas.co.nz).

Yours sincerely



**William Hancock**  
Regulatory Analyst

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<sup>1</sup> *Options for information disclosure in the wholesale gas sector*, Firstgas submission to the GIC, 24 April 2019, [https://firstgas.co.nz/wp-content/uploads/First-Gas-submission\\_Options-paper-for-ID\\_April-2019.pdf](https://firstgas.co.nz/wp-content/uploads/First-Gas-submission_Options-paper-for-ID_April-2019.pdf)