

Ian Dempster
Gas Industry Company
Po Box 10646
Wellington

CC: Ben Gerritsen
First Gas Limited
Level 6, Midland Chambers
45 Johnston Street
Wellington 6011

5 September 2018

Dear Ian,

Gas Transmission Access Code: Outage information

emsTradepoint welcomes the opportunity to submit to the Gas Transmission Access Code(GTAC) process our proposal for efficient market function through transparency of gas supply outage information. We are a commodity exchange designed to provide anonymity, transparent pricing and transactional certainty to physical energy markets such as natural gas. We aim to develop a sustainable market for efficient real-time and forward gas trading as an integral part of the natural gas supply chain.

We support the process that First Gas Limited (FGL) and the Gas Industry Group (GIC) are following in developing the industry code. At this stage in the code development process we ask the GIC to take a closer look at how to incentivize timely information provision to the market for planned and unplanned outages. In our view, timely outage information is essential to support a well-functioning gas market and the corollary is potential market detriment if information relevant to trading is not being disclosed.

Although we've had several discussions around planned and unplanned outage information transparency in the market, the information is not forthcoming. We consider the final version of the GTAC should include guidelines to encourage all parties to provide outage information to ensure equal access to relevant operating conditions that supports a well-functioning market.

Please contact me if you would like to discuss this submission further, by phone 04 590 7312 or email quintin.tahau@emstradepoint.co.nz

Yours sincerely,



Quintin Tahau
General Manager emsTradepoint Limited