

4th November 2019

Gas Industry Company
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Draft Upstream Gas Outage Information Disclosure Code 2019

We appreciate the opportunity to respond to the draft outages information disclosure regime proposed by gas producers, storage owners and the Petroleum Exploration and Production Association of New Zealand (PEPANZ).

Transpower considers this voluntary approach by key gas industry parties a positive step to recognising the value that gas outage disclosures will bring to the electricity industry. The gas outages in the latter part of 2018 caused consequences for the electricity sector that highlighted the need for timely outages information. We support the adoption of the voluntary disclosure Code as an immediate response to the concerns raised about the availability of outage information.

However, we also note the Gas Industry Company (GIC) has observed the voluntary approach may fail if one or more parties opt out. Early adoption of the Code by all upstream users would go a long way toward demonstrating the potential success of a voluntary Code.

Yours sincerely



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