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**Submission on the GIC's Issues Paper on Transmission  
Security and Reliability**

**Introduction**

1. This is Vector Limited's (Vector) submission on the Gas Industry Company's (GIC) Issues Paper, *Gas Transmission Security and Reliability* (the Issues Paper), dated April 2016.
2. We appreciate the GIC's face-to-face engagement with stakeholders on the Issues Paper on 24 May 2016.
3. We generally agree with the GIC's assessment of existing gas transmission security and reliability (S&R) arrangements in New Zealand, and make a couple of suggestions below.
4. Vector's contact person for this submission is:  

Luz Rose  
Senior Regulatory Specialist  
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5. No part of this submission is confidential and we are happy for it to be made publicly available.

**GIC's assessment of transmission S&R**

6. Vector agrees with the GIC's assessment that the necessary arrangements are in place for an effective gas transmission S&R in New Zealand.
7. In our view, there is no need for the impending single transmission system operator (TSO) to disclose its Pipeline Integrity Management Plan, in addition to its Asset Management Plan (AMP) that is already required to be disclosed under Part 4 of the

*Commerce Act 1986*. We consider the information requirements for a transmission AMP to be sufficiently comprehensive, and that new or expanded information disclosure requirements are therefore not warranted.

8. However, we agree that consumers' confidence in gas transmission S&R could be enhanced if the transmission AMP includes a narrative (i.e. 'tells the story') of where the key S&R risks lie and what particular measures are in place to address them, including the TSO's insights about the management of these risks. This should not require additional information disclosure requirements.
9. To further enhance future communication about key transmission S&R risks, we suggest that the TSO and interested parties meet to discuss these risks and related issues on a regular basis. We further suggest that the GIC play a role in facilitating these discussions.

### **Concluding comment**

10. We are happy to discuss with the GIC any aspect of this submission.

Yours sincerely  
For and on behalf of Vector Limited



Luz Rose  
**Senior Regulatory Specialist**