COMPLIANCE STATEMENT

Gas transmission services – Compliance with price path

Assessment Period 1 October 2023 – 30 September 2024

First Gas Limited
September 2023

Introduction

First Gas Limited (Firstgas) owns and operates 2,500 kilometres of gas transmission pipelines. These pipelines transport around 20 percent of New Zealand's primary energy supply from Taranaki across the North Island. Firstgas also owns and operates more than 4,900 kilometres of gas distribution pipelines that service approximately 66,000 consumers across the regions of Northland, Waikato, Central Plateau, Bay of Plenty, Gisborne and Kāpiti Coast.

Firstgas is part of the wider Firstgas Group. Headquartered in New Plymouth, Firstgas Group is an umbrella brand consisting of Rockgas, Firstgas, Flexgas and Gas Services NZ. Firstgas and Rockgas deliver natural gas and supply LPG respectively to over 500,000 customers through their network of high-pressure gas transmission pipelines and distribution pipelines in the North Island, as well as through LPG distribution pipelines in the South Island, 36 local LPG suppliers, and over 180 Refill & Save locations across New Zealand.

Flexgas operates the Ahuroa gas storage facility in Central Taranaki. Gas Services NZ provides operational and maintenance support to all gas infrastructure owners, including other parts of Firstgas.

Compliance statement in respect of price setting

This document is a compliance statement prepared pursuant to clauses A3 - A6 of the Notice to supply information to the Commerce Commission under section 53N of the *Commerce Act 1986* – Compliance statements for the third regulatory period (the Notice). This Compliance Statement covers the second Assessment Period for DPP3[1] and is for the period from 1 October 2023 to 30 September 2024 (GY2024).

Compliance with Price Path	Yes

Firstgas will retain the structure of the prices under the Maui Pipeline Operating Code (MPOC) and Gas Transmission Code (GTC) for this pricing year. The revenue earned from transmission services provided under the MPOC and GTC has been updated to reflect changes in allowable revenue, forecast transmission quantities, and pass-through and recoverable costs.

A Directors' certificate is provided with this compliance statement in **Appendix 3**.

Further information

For further information regarding this Compliance Statement, please contact:

Saba Malik
Regulatory and Policy Manager
First Gas Limited
Saba.Malik@firstgas.co.nz
04 979 5368

[1] The third regulatory period under the default price quality path framework is for the period 1 October 2022 to 30 September 2026.

Disclaimer

For presentation purposes, some numbers in the Compliance Statement have been rounded. This may cause small discrepancies or rounding inconsistencies when aggregating some of the information presented in this statement. These discrepancies do not affect the overall compliance calculations which are based on more detailed information.

Table of contents

1. Price setting for gas transmission services 5

1.1 Price path for GTBs 5

1.2 Forecast Revenue from Prices 5

1.3 Forecast Allowable Revenue 8

1.4 Compliance 9

2. Additional compliance requirements 10

2.1 Certification 10

2.2 Statement date 10

Appendix 1: Calculation of forecast standard revenue for the GTC 11

Appendix 2: Methodology for forecasting GY2023 quantities 12

Appendix 3: Directors' certification 13

1. Price setting for gas transmission services

Firstgas is pleased to confirm that we have set gas transmission prices to comply with the price path in clause 8.3 of the *Gas Transmission Services Default Price-Quality Path Determination 2022* (PQ Determination) for the Assessment Period from 1 October 2023 to 30 September 2024 (GY2024).

1.1 Price path for GTBs

The PQ determination sets out that the Forecast Revenue from Prices of a GTB for each Assessment Period must not exceed the Forecast Allowable Revenue for the Assessment Period.

Forecast Revenue from Prices ≤ Forecast Allowable Revenue

1.2 Forecast Revenue from Prices

As specified in Schedule 3 of the PQ Determination, when a GTB sets prices for an Assessment Period, the GTB must calculate the Forecast Revenue from Prices for the Assessment Period.

Forecast Revenue from Prices is defined as:

Forecast Revenue from Prices = *sum of each price multiplied by each corresponding forecast Quantity*

The GTB must prepare a forecast of Quantities for the Assessment Period to which the Prices for the Assessment Period will apply. All forecast Quantities used to calculate the Forecast Revenue from Prices must be reasonable.

<u>Firstgas' transmission business</u>

For the pricing year commencing 1 October 2023 (GY2024), Firstgas will continue to apply the two existing pricing methodologies for the Maui and Non-Maui gas transmission systems – the methodologies under the Maui Pipeline Operating Code (MPOC) and the Gas Transmission Code (GTC). A full overview of our charging can be found in sections 3 and 5 of our Transmission Pricing Methodology (TPM).[2]

We have prepared a forecast of volumes for the period, across standard products and non-standard contracts. We have also developed estimates of overrun revenue for the gas year. The combination of standard product revenue and non-standard contract revenue forms the basis of our Forecast Revenue from Prices for the year. Forecast Revenue from Prices is set out in the following table.

[2] The Transmission Pricing Methodology for the year commencing 1 October 2023 can be found here: https://firstgas.co.nz/about-us/regulatory/transmission/

Table 1: Forecast Revenue from Prices

Target revenue for the Assessment Period	Amount	
	GY2024 ($)	Proportion of Target Revenue (%)
Standard MPOC revenue for the period 1 October 2023 to 30 September 2024	$50,053,825	27.02%
Standard GTC revenue for the period 1 October 2023 to 30 September 2024	$128,526,014	69.37%
Non-Standard Pricing (SA and ICA Revenue)	$6,685,581	3.61%
Target Revenue	**$185,265,420**	**100.00%**

Standard Prices and Revenue for GY2024 are set out in the tables below. Further information on the calculation of forecast standard revenue for the GTC is available in **Appendix 1**.

Table 2: MPOC Standard prices and revenue

	Unit	Price ($)	Quantity	Revenue
Tariff 1	$ / GJ.km	0.002623	13,110,085,038	$34,387,753.05
Tariff 2	$ / GJ	0.11959	130,998,178	$15,666,072.15
Total MPOC Standard Revenue				**$50,053,825.21**

Table 3: GTC standard prices and revenue

Pricing Region	2023/2024		Revenue		Total Revenue ($)
	TPF ($/GJ)	CRF ($/GJ.MDQ)	TPF ($)*	CRF ($)	
Taranaki	$ 0.82	$ 118	$ 1,818,614	$ 567,816	**$ 2,386,430**
Waikato South	$ 0.82	$ 519	$ 6,499,696	$ 9,215,883	**$ 15,715,579**
Auckland	$ 0.82	$ 504	$ 13,781,720	$ 28,774,368	**$ 42,556,088**
Northland	$ 0.82	$ 766	$ 165,366	$ 456,536	**$ 621,902**
Waikato North	$ 0.82	$ 519	$ 3,521,065	$ 6,497,361	**$ 10,018,426**
South Taranaki - Whanganui	$ 0.82	$ 490	$ 1,538,757	$ 3,271,730	**$ 4,810,487**
Manawatu - Horowhenua	$ 0.82	$ 504	$ 2,078,523	$ 3,857,616	**$ 5,936,139**
Hawkes Bay	$ 0.82	$ 519	$ 1,764,625	$ 3,567,087	**$ 5,331,712**
Kapiti - Wellington	$ 0.82	$ 624	$ 3,924,442	$ 10,899,408	**$ 14,823,850**
Waikato East	$ 0.82	$ 519	$ 174,738	$ 1,558,557	**$ 1,733,295**
Bay of Plenty West	$ 0.82	$ 638	$ 1,614,648	$ 3,750,802	**$ 5,365,450**
Bay of Plenty South	$ 0.82	$ 667	$ 1,669,475	$ 4,235,450	**$ 5,904,925**
Bay of Plenty East	$ 0.82	$ 697	$ 914,095	$ 2,775,454	**$ 3,689,549**
Eastland	$ 0.82	$ 728	$ 454,099	$ 1,102,920	**$ 1,557,019**
Hamilton	$ 0.82	$ 392	$ 1,426,656	$ 2,584,683	**$ 4,011,339**
Frankley Road	$ 0.15	n/a	$ 4,063,825	n/a	**$ 4,063,825**
Total Standard Revenue			**$ 45,410,343**	**$ 83,115,671**	**$ 128,526,014**

*includes overrun revenue

<u>Total Forecast Revenue from Prices</u>

The total Forecast Revenue from Prices is **$185.27** million.

Forecast Revenue from Prices = *Forecast Revenue from MPOC Prices*
+ Forecast Revenue from GTC Prices
+ Forecast Revenue from Non-Standard Prices

= $50.054 million + $128.526 million + $6.686 million
= **$185.27 million**

1.3 Forecast Allowable Revenue

Schedule 5 sets out that Forecast Allowable Revenue must be determined in accordance with the following formula.

Forecast Allowable Revenue =	*forecast net allowable revenue +*
	forecast pass-through and recoverable costs +
	opening balance of the wash-up account

where:

forecast net allowable revenue	is the amount specified in Schedule 4
forecast pass-through and recoverable costs	is the sum of all the forecast Pass-through Costs and forecast Recoverable Costs, excluding any Recoverable Cost that is a *revenue wash-up draw down amount* calculated as specified in paragraph 5 of Schedule 7 and
opening balance of the wash-up account	is the amount calculated as specified in paragraph 4[3] of Schedule 8.

Forecast Net Allowable Revenue

As established in schedule 4 of the PQ Determination, the Forecast Net Allowable Revenue for the Assessment Period ending 30 September 2024 is **$163.455 million**.

Forecast Pass-through Costs and Recoverable Costs

The PQ Determination states that all forecasts of Pass-through Costs and Recoverable Costs must be reasonable. For GY2024, Firstgas has forecast the following costs as shown in Table 4.

Table 4: Forecast pass-through and recoverable costs

Forecast Pass-through and Recoverable Costs	$million
Rates and levies	$3.096
Balancing gas costs and revenues	$2.750
Mokau Compressor fuel gas costs	$1.500
CAPEX Wash-up Adjustment	$1.518
Total	**$8.864**

All the forecast Pass-through Costs and Recoverable Costs included above meet the definitions set out in clause 3.1.2 and 3.1.3 of the applicable Input Methodologies.

Opening balance of the wash-up amount

The *opening wash-up account balance* for the first Assessment Period is $13.011 million**.** This is equal to the *closing wash-up account balance* of the last Assessment Period of the previous regulatory period of $11,652

[3] The definition in Schedule 5 refers to paragraph 3 of Schedule 8. The Commission has confirmed this is a drafting error in the PQ Determination and Firstgas should apply the requirements in paragraph 4 of Schedule 8 for the purpose of completing our FY2023 ex-Ante compliance statement.

million adjusted for the time value of money as specified in schedule 8 of the Gas Transmission Services Default Price Quality Path Determination 2022.

<u>Calculation of Forecast Allowable Revenue</u>

Firstgas has calculated Forecast Allowable Revenue as follows:

Forecast Allowable Revenue =	*forecast net allowable revenue +*
	forecast pass-through and recoverable costs +
	opening balance of the wash-up account
	= \$163.455 million + \$8.8641 million + (\$-13.011 million)
	= \$185.33 million

1.4 Compliance

Based on the calculations set out in sections 1.2 and 1.3 above, Firstgas will comply with the price path of the PQ Determination for GY2024.

Forecast Revenue from Prices	≤	Forecast Allowable Revenue
\$185.265 million	≤	\$185.33 million

2. Additional compliance requirements

2.1 Certification

The required certification for this Compliance Statement is attached in **Appendix 3.**

2.2 Statement date

This Compliance Statement was prepared on 12 July 2023.

Appendix 1: Calculation of forecast standard revenue for the GTC

	Prices		Quantities		Revenue by component ($)			GTC total standard revenue ($)
Pricing Region	TPF ($/GJ)	CRF ($/GJ.MDQ)	Throughput	Capacity reservations	TPF	CRF	Over-Run	
Taranaki	$0.82	$118	2,124,792	1,761,192	$1,742,329	$567,816	$76,284	$2,386,430
Waikato South	$0.82	$519	4,093,390	6,499,062	$3,356,580	$9,215,883	$3,143,116	$15,715,579
Auckland	$0.82	$504	14,999,113	20,895,672	$12,299,273	$28,774,368	$1,482,447	$42,556,088
Northland	$0.82	$766	154,745	218,136	$126,891	$456,536	$38,475	$621,902
Waikato North	$0.82	$519	3,870,446	4,581,954	$3,173,766	$6,497,361	$347,299	$10,018,426
South Taranaki - Whanganui	$0.82	$490	1,587,612	2,443,782	$1,301,842	$3,271,730	$236,915	$4,810,487
Manawatu - Horowhenua	$0.82	$504	2,195,113	2,801,364	$1,799,993	$3,857,616	$278,531	$5,936,139
Hawkes Bay	$0.82	$519	1,606,408	2,515,518	$1,317,255	$3,567,087	$447,370	$5,331,712
Kapiti - Wellington	$0.82	$624	3,972,925	6,392,922	$3,257,799	$10,899,408	$666,644	$14,823,850
Waikato East	$0.82	$519	20,934	1,099,098	$17,166	$1,558,557	$157,572	$1,733,295
Bay of Plenty West	$0.82	$638	1,670,311	2,151,714	$1,369,655	$3,750,802	$244,993	$5,365,450
Bay of Plenty South	$0.82	$667	1,727,264	2,324,100	$1,416,356	$4,235,450	$253,119	$5,904,925
Bay of Plenty East	$0.82	$697	991,416	1,457,412	$812,961	$2,775,454	$101,134	$3,689,549
Eastland	$0.82	$728	327,255	554,490	$268,349	$1,102,920	$185,749	$1,557,019
Hamilton	$0.82	$392	1,627,710	2,416,332	$1,334,722	$2,584,683	$91,933	$4,011,339
Frankley Road	$0.15	n/a	27,092,166	n/a	$4,063,825	n/a	n/a	$4,063,825
Total Standard Revenue (GTC)					**$37,658,761**	**$83,115,671**	**$7,751,582**	**$128,526,014**

Appendix 2: Methodology for forecasting GY2024 quantities

Methodology for flow quantities

Aretê Consulting Limited (Aretê) was employed by Firstgas to forecast the gas flows across the transmission network and this was was peer reviewed by Firstgas staff. This forecast used statistical timeseries approaches to forecasting smaller loads on the system and potential growth. Deterministic methods were used for large loads using data from large users. Firstgas' knowledge of large additional loads on the system was also used to forecast growth in large loads.

Aretê's forecast was assessed for reasonability by Firstgas management and found to be reasonable and aligned with the most recent information we had received from customers at the time of writing.

Methodology for capacity reservation quantities

Capacity reservations have been estimated based on historical gas flows and observed booking patterns. Shippers generally seem to reserve less capacity than their annual peak demand, as a way of optimising between reservation fees and overrun charges. One GJ of reserved capacity attracts 365 days of charges, whereas one GJ of overrun is charged the equivalent of 10 days of charges. Analysis of previous years suggests that shippers have tended to book capacity for the start of the gas year at a level that represents about the 37th highest day in the previous gas year.

Adjustments have been made where required to account for the expiration of supplementary agreements, where the load will go back to standard pricing for the coming year.

Appendix 3: Directors' certification

We, Mark Adrian Ratcliffe and Fiona Ann Oliver, being directors of First Gas Limited certify that, having made all reasonable enquiry, to the best of our knowledge and belief, the attached price-path compliance statement of First Gas Limited, and related information, prepared for the purposes of the *Gas Transmission Services Default Price-Quality Path Determination 2022* has been prepared in accordance with all the relevant requirements.

Director: Mark Adrian Ratcliffe	Director: Fiona Ann Oliver
13 July 2023	13 July 2023
Date	Date