



Improving the transparency of the gas market

The Ministry of Business, Innovation and Employment (MBIE) would like your feedback on the proposals paper on additional information we plan to request, and in some cases publish, to improve the transparency of the gas market.

Please provide your feedback by **5pm, 7 November 2025**.

When completing this submission form, please provide comments and supporting explanations for your reasoning where relevant. Your feedback provides valuable information and informs decisions about the proposals.

We appreciate your time and effort taken to respond to this consultation.

Instructions

To make a submission you will need to:

1. Fill out your name, email address, phone number and organisation. If you are representing an organisation, please provide a brief description of your organisation and its aims, and ensure you have the authority to represent its views.
2. Fill out your responses to the questions. You can answer any or all of these questions in the proposals paper. Where possible, please provide us with evidence to support your views. Examples can include references to independent research or facts and figures.
3. If your submission has any confidential information:
 - i. Please state this in the email accompanying your submission, and set out clearly which parts you consider should be withheld and the grounds under the Official Information Act 1982 (Official Information Act) that you believe apply. MBIE will take such declarations into account and will consult with submitters when responding to requests under the Official Information Act.
 - ii. Indicate this on the front of your submission (e.g. the first page header may state "In Confidence"). Any confidential information should be clearly marked within the text of your submission (preferably as Microsoft Word comments).
 - iii. Note that submissions are subject to the Official Information Act and may, therefore, be released in part or full. The Privacy Act 2020 also applies.
4. Submit your feedback:
 - a. You can make a submission by emailing to gasconsultation@mbie.govt.nz with either:
 - i. a completed submission using this electronic template; or
 - ii. a submission in another format of your choice.

Submitter information

MBIE invites you to provide some information about yourself. If you choose to provide information in the section below, it will be used to help MBIE understand how different sectors view the proposals and options for requiring and achieving minimum onshore fuel stockholding. Any information you provide will be stored securely.

Your name, email address, phone number and organisation

Name:	Lincoln Pore
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Organisation:	Mercury NZ Ltd (Mercury)

- The Privacy Act 2020 applies to submissions. Please tick the box if you do **not** wish your name or other personal information to be included in any information about submissions that MBIE may publish.
- MBIE may upload submissions and potentially a summary of submissions to its website, www.mbie.govt.nz. If you do **not** want your submission or a summary of your submission to be placed on either of these websites, please tick the box and type an explanation below:

I do not want my submission placed on MBIE's website because... [insert reasoning here]

Please check if your submission contains confidential information

- I would like my submission (or identifiable parts of my submission) to be kept confidential, and **have stated** my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE.

Mercury NZ Ltd

Mercury's generation assets produce electricity from 100% renewable sources: hydro, geothermal and wind. We also retail electricity, gas, broadband and mobile services. In the gas market we operate as a buyer and retailer, not a producer.

We think this is an important opportunity to improve market transparency so businesses and customers can make timely, well-informed decisions and the transition remains orderly. We support a clear, consistent disclosure framework that delivers genuine price discovery through deal-level contract disclosure with anonymity, aligned with electricity hedge-disclosure logic, and that provides regular forward supply visibility through standardised producer reporting. We also support proportionate publication settings that protect confidentiality and avoid prescriptive retailer pricing templates that would constrain product design.

Improving the transparency of the gas market

1. MBIE and GIC currently publish a range of gas information but there are issues with this:

- a. MBIE's information has gaps and is often published with a lag.
- b. GIC's data (while more timely) does not include private pipelines. This creates gaps.

Do you agree with the issues outlined above? Please explain why or why not.

Yes Yes, with changes No Not sure/No preference

Please explain your views.

Mercury agrees there are issues with current datasets, with the most material problem being information asymmetry. Producers and a small group of counterparties have continuous visibility of supply and reserves, while retailers and many users rely on lagged MBIE series and GIC data that exclude private pipelines. That leaves long periods without usable context on short- to medium-term supply, which affects pricing, contracting and customer communications.

We support more frequent, comprehensive quantitative data on supply and reserves, and inclusion of private-pipeline flows. Aggregation (with minimum counts and a modest lag) can manage confidentiality.

Our views have been informed by the following expert report.

[Independent expert panel commissioned by Mercury.pdf](#)

2. Is a lack of information or out-of-date information impacting your ability to make informed decisions about gas use? Please provide examples.

Yes Yes, in part No Not sure

Please explain your views.

When we discuss contract terms with a supplier, the lack of reliable visibility of recently executed contracted off market volumes and near-term supply makes efficient pricing harder. With the last public reserves release about nine months ago and no proper price discovery, we negotiate within wider price bands and shorter terms to manage risk. More timely, quantitative supply and reserves data available to all parties would directly improve these decisions.

3. We want to achieve three objectives with this work:

- a. Enable businesses to make efficient decisions
- b. Create a more level playing field for businesses
- c. Enable government to better monitor the gas market

Do you agree with the objectives we have proposed for these changes? Please explain why or why not.

I agree I agree, with changes I disagree Not sure

Please explain your views.

These objectives are very beneficial for Mercury. Timely, shared information and a level playing field support efficient decisions and better outcomes for Mercury customers and the wider energy system. We support MBIE pursuing these objectives.

Information we propose to seek from gas producers (page 6 onwards)

4. Do you agree that the information we propose to request will help improve gas market transparency? If not, why not?

I agree I agree, with changes I disagree Not sure

Please explain your views.

The proposals would improve transparency, with changes to make quarterly producer forecasts the anchor. We support mandatory quarterly updates in a standard template, with a brief explanation of material variances between forecast and actuals. Daily field data submitted weekly should support and validate the quarterly view, with publication in aggregated form. Detailed assumptions and project timing can be provided to MBIE but not published to manage confidentiality.

5. Is there any other information we should request that would help improve gas market transparency?

The current price data is infrequent, highly aggregated and lacks relevant supporting information, so it does not deliver useful price discovery.

We would support a disclosure regime similar to what is required for OTC transactions in the wholesale electricity market. Enhancing price disclosure will provide fairer outcomes for end users and price signalling to inform operational and future electrification decisions for downstream purchasers of gas.

Do not prioritise uncontracted-volume disclosure; executed prices provide the clearer signal. MBIE could also publish a simple forward indicator derived from the executed dataset.

6. If your organisation would use the information outlined in the Proposals Paper, are there any proposals that would be of particular value to your organisation? If so, which ones and why? For instance, would contextual information about reserves and forecasts be useful?

The proposals that would be of value to Mercury are:

- Contract disclosure for price discovery. Anonymised reporting of executed contract prices between producers and retailers or large users. This would provide a credible price signal, reduce information asymmetry, and improve procurement and customer pricing.
- More regular producer forecasts. Standardised quarterly forecasts of expected supply, with a brief explanation of variances from the previous quarter. This would improve near-term planning and contracting.

7. Do you agree with the items that we do not propose to request?

I agree I agree, with changes I disagree Not sure

Please explain your views.

We agree not to request these items at this stage.

8. Do you agree with our decisions on which information to publish and which not to publish? If not, which information should we, or should we not, publish?

I agree I agree, with changes I disagree Not sure

Please explain your views.

We support most of MBIE's publish/not-publish decisions, with one change: publish contract details, including price, using the same logic as electricity hedge disclosures i.e. simplified information and anonymised.

We propose a disclosure regime using standard fields capturing contract term, deal date, price, and contract type (for example GSA/Option), while ensuring anonymity. This would provide genuine price discovery to complement volume and reserves data while managing confidentiality.

9. What are the challenges and costs of providing the additional information we propose to request? You may respond to as many items as you wish.

Yes, there are challenges and/or costs No, there are no challenges and/or costs
 Not sure

Please explain your views.

Mercury is not a gas producer and is not well placed to assess producers' costs or operational challenges. As a buyer and retailer, we support MBIE seeking this information to improve market transparency.

10. What are the risks (if any) if we publish the additional information from gas producers?

Mercury does not see significant sector-wide operational risks. The key risks are confidentiality and unintended effects from high-frequency, granular data; these can be managed through aggregated publication with minimum counts and a modest lag.

11. Any other comments not covered by the questions above?

N/A

Information we propose to seek from the wider gas sector (page 9 onwards)

12. Do you agree that the information we propose to request will help improve gas market transparency? If not, why not?

- I agree I agree, with changes I disagree Not sure

Please explain your views.

Mercury agrees some parts of the information requested will improve market transparency, with changes to prioritise price discovery. We support a contract disclosure regime where executed prices for large producer-to-retailer and producer-to-large-user contracts are published monthly in anonymised, aggregated form (no counterparty identification), using standard fields (tenor bucket, firm/interruptible, fixed/indexed, broad delivery zone) and machine-readable release. "Retailer" should be defined to include vertically integrated parties (for example, the upstream arms of Nova and Greymouth).

We also support regular producer forecasts with brief variance notes, and publication of aggregated contracted volumes by quarter to give clear supply context. We do not support shifting the focus to uncontracted volumes or adding new reporting obligations on retailers; the priority is effective price discovery via executed prices.

13. Is there any other information we should request that would help improve gas market transparency?

Yes - Publish simple statistics on pipeline capacity utilisation by segment or zone. This would help sellers assess additional sales potential and identify constrained areas.

14. If your organisation would use the information above, are there any proposals that would be of particular value to your organisation? Why is that?

Yes - Pricing information will be used to calibrate our offers and improve competitiveness. Executed price disclosure provides a clearer market signal for procurement and customer pricing.

15. Do you agree with our proposal to not request contract information for stored gas?

- I agree I agree, with changes I disagree Not sure

Please explain your views.

We understand why MBIE has chosen not to request contract information for stored gas, and we see potential benefits in publishing anonymised ownership information if it becomes material to market understanding

16. Do you agree with our proposal to publish all of the requested information? If not, which information should we not publish?

- I agree I agree, with changes I disagree Not sure

Please explain your views.

No. The entity names of gas suppliers, gas retailers and contracted gas users should not be disclosed to avoid commercial confidentiality issues. Mercury recommends the adoption of naming structures such as Supplier A, gas retailer B or gas user group X.

17. What are the challenges and costs to provide the information we propose to request? You may respond to as many items as you wish.

There will be material challenges and costs for Mercury if weekly reporting is required:

- **Workload:** Compiling accurate, validated datasets on contracted gas, prices and usage each week would add significant admin. A full run currently takes longer than a day when there are no issues, and longer when discrepancies need investigation.
- **Pricing format risk:** A prescribed pricing template would drive system changes and ongoing maintenance, and would effectively dictate how we can structure products, constraining design and innovation.
- **Data availability:** Weekly usage data is difficult where customers do not have smart meters or are in remote locations, so estimates are needed and the risk of error rises.
- **Contract interpretation:** Contracted volumes can change due to break clauses, early termination or options. Without a standard treatment of these features, published figures may misrepresent the market.
- **Revisions:** Prior usage volumes may need to be refreshed after unaccounted-for gas (UFG) is allocated, so any reporting should allow for updates.

18. What are the risks (if any) if we publish the additional information from the wider gas sector?

Mercury does not see significant sector-wide operational risks. The risks we note are confidentiality and unintended effects from high-frequency, granular data.

19. If you are a renewable gas producer, what would be the costs and implications of having to report on your production volumes?

N/A

20. Any other comments not covered by the questions above?

We're keen to work further with MBIE to ensure a managed fair transition for all consumers, including via ensuring appropriate, trusted information is available to customers seeking to electrify.