



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:	Ron Hooper, CEO
Email address:	Ron.hooper@wml.biz
Phone number:	
Organisation:	Whakatane Mill Ltd

- 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:

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.

Commented [A1]: Currently not proposing to provide the detail on gas/electricity price challenges so don't need to invoke this.

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.

N/A

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.

This effect is two-fold:

- 1) WML and its advisors must parse through greater uncertainty due to the time lag which makes forecasting and contracting more challenging.
- 2) This uncertainty is priced into the market, meaning contracted gas prices are likely higher than the counterfactual.

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.

We agree, and note the wider context (covered in the consultation document) — that is, escalating gas prices have driven many industrial users to closure or significant curtailment. This is a core strategic challenge for New Zealand and we welcome all efforts to address it.

In particular we emphasise the need for equal access to information, reducing users' reliance on privileged upstream relationships.

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.

N/A

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

We note the strong interdependencies between the gas and electricity markets. Gas data should as much as possible align with electricity market data.

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?

Weekly pricing and contracted/uncontracted gas supply information would be the highest priority.

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.

[insert response here]

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.

[insert response here]

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.

N/A

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

N/A

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.

Yes. Priorities are contracted gas and up-to-date pricing, to inform users' contracting.

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

N/A

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?

Contracted gas and up-to-date 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.

As noted, this information is already published.

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.

N/A

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.

N/A

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

N/A

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?

N/A