



Matthew Clark
Transpower and Gas Manager
Commerce Commission
By email: infrastructure.regulation@comcom.govt.nz

28 April 2026

Dear Matthew

Re: Gas DPP4 2026 – Hybrid mechanism and IM amendments (cross-submission)

Greymouth considers this suggested change ill-considered.

Greymouth supports industry and consumer objections concerning the unsustainability of the regulatory model.

Greymouth submits that GDB requests for a lower 5% threshold (when demand reduces) are inappropriate given (a) CPPs weren't applied for when previous demand reductions have been more than that, (b) the closer GDB cost-sharing goes to zero the more this solution is a poor band-aid and the potential for gaming is increased, and (c) citing investment in the context of reducing demand seems a proxy for maximising revenue rather than supporting gas conveyancing services at risk.

Greymouth further submits that the time has come for the unsustainability of the regulatory model to be properly addressed.

Yours sincerely,

Chris Boxall

Chris Boxall
Commercial Manager