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# Quarterly Fuel Monitoring Report

For the quarter ended 31 December 2023

# Contents

<b>EXECUTIVE SUMMARY .....</b>	<b>2</b>
<b>OUR ROLE.....</b>	<b>3</b>
<b>THE WHOLESALE FUEL MARKET .....</b>	<b>4</b>
<b>THE RETAIL FUEL MARKET .....</b>	<b>12</b>
<b>ATTACHMENT A: NEW ZEALAND’S FUEL SUPPLY CHAIN.....</b>	<b>18</b>
<b>ATTACHMENT B: THE TERMINAL GATE PRICING REGIME .....</b>	<b>19</b>
<b>ATTACHMENT C: RELEVANT TAXES, COSTS AND LEVIES .....</b>	<b>25</b>
<b>ATTACHMENT D: DATA .....</b>	<b>26</b>
<b>ATTACHMENT E: GLOSSARY .....</b>	<b>29</b>

## Executive summary

Petrol prices increased for consumers in the July to September quarter due to the return of the domestic fuel excise tax and higher importer costs.<sup>1</sup> In the December 2023 quarter, importer costs decreased for all fuel types, which has translated into only a small decrease in petrol prices for consumers, while diesel prices increased compared to the September 2023 quarter as the importer margin on diesel increased. Importer margins increased for all fuel types this quarter and were some of the highest we have seen since our monitoring began.

Although some variation in importer margins can be expected over the short term, we intend to increase our focus on importer margins and whether changes in costs are passed through to the consumer, particularly with the upcoming removal of the Auckland regional fuel tax on 30 June 2024.<sup>2</sup>

Once again, we emphasise to all consumers that, even if a retail board price is discounted through a discount day or loyalty card or programme, it does not mean that it is necessarily the cheapest price available. There continue to be wide variations in retail prices, although some areas like Whangārei have experienced more competitive pricing with an increase in local competition. In addition to our quarterly monitoring, we have published two focus reports that look in more detail at factors that influence differences in prices and the competitive impact of new unstaffed fuel stations on retail fuel prices.

In the wholesale market, the positive trend in multi-sourcing continues, with the proportion of fuel sourced by distributors from more than one wholesale supplier at the highest level since the start of our monitoring. Multi-sourcing can promote competition, with wholesale customers negotiating with multiple suppliers, potentially giving them greater leverage to obtain lower prices. Terminal gate prices (TGPs) in New Zealand continue to appear high relative to the cost of importing fuel and compared to other reference points such as wholesale contract prices and Australian TGPs.

Our message to consumers remains that we encourage them to shop around for the best price for their fuel. We will continue our monitoring work with a focus on importer margins to support reduced costs being passed on to consumers as lower prices at the pump.

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<sup>1</sup> The tax was returned to its pre-March 2022 level, adding 28.75 cpl to the retail prices of Regular 91 and Premium petrol grades.

<sup>2</sup> Repeal of the ARFT,

[https://legislation.govt.nz/act/public/2024/0009/latest/LMS927424.html?search=qs\\_act%40bill%40regulation%40deemedreg\\_repeal+regional+fuel\\_25\\_h&p=2&sr=1](https://legislation.govt.nz/act/public/2024/0009/latest/LMS927424.html?search=qs_act%40bill%40regulation%40deemedreg_repeal+regional+fuel_25_h&p=2&sr=1).

## Our role

The Commerce Commission is an independent Crown entity that administers and enforces laws relating to competition, fair trading, consumer credit and economic regulation. We have responsibilities for monitoring and regulating engine fuel markets in New Zealand under the Fuel Industry Act 2020 (the Act). The Act's purpose is to promote competition in engine fuel markets for the long-term benefit of end users of engine fuel products.<sup>3</sup>

The Act provides that, in monitoring of the performance of the market, the Commission may analyse and summarise any information disclosed to us and publish any resulting analysis or summary.<sup>4</sup> Information is disclosed by fuel importers, wholesale suppliers and distributors on a quarterly and/or annual basis under the Fuel Industry Regulations 2021 (the Regulations). Information disclosed relates to fixed wholesale contracts, certain financial statements, certain formulas and volumes, discounting and loyalty programmes, storage capacity, and retail sites and fuel supply.<sup>5</sup>

Our analysis for these quarterly monitoring reports is based on the information disclosed to us by fuel importers (ID data).<sup>6</sup> Five companies currently import fuel into New Zealand: BP, Mobil, Z Energy, Gull and Timaru Oil Services Limited (TOSL).<sup>7</sup>

Monitoring engine fuel markets allows for a deeper understanding of the competitive dynamics over time through observing patterns and trends. Our reports 'shine a light' on what is happening in the fuel markets to promote transparency and improve awareness of the factors influencing prices for consumers.

The Commission also has an enforcement role in relation to the obligations on fuel industry participants under the Act.<sup>8</sup> We monitor compliance with the requirements of the Act and, if we have concerns about potential non-compliance, we may investigate further.

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<sup>3</sup> Section 3 of the Act, <https://www.legislation.govt.nz/act/public/2020/0060/latest/whole.html#LMS321426>.

<sup>4</sup> Sections 25 and 28 of the Act.

<sup>5</sup> Part 3A of the Regulations.

<sup>6</sup> See reg 3 of the Regulations: 'Fuel importer' is defined as a fuel industry participant that imports fuel into New Zealand.

<sup>7</sup> TOSL provides exclusive supply to its related entity Tasman Fuels. Tasman Fuels is the entity that publishes TGPs. It also operates various retail fuel sites.

<sup>8</sup> See Part 3 of the Act.

# The wholesale fuel market

Importers sell fuel to wholesale customers (including distributors, dealers, other importers and commercial end users) as well as retail customers.<sup>9</sup> Fuel sales in the wholesale market are usually made through fixed wholesale contracts, although there is an opportunity for wholesale customers, under certain circumstances, to purchase fuel on an ad hoc basis using a spot price or an importer’s published TGP for the relevant terminal.

The Act introduced a number of requirements for fuel industry participants, including conditions regarding TGPs and fixed wholesale contract terms. As prescribed in the Act, from July 2023, TGPs may be subject to price regulation.<sup>10</sup>

We present the information disclosed to us by the different types of wholesale customer, particularly focusing on sales to distributors and dealers rather than by type of sale (ie, contract or ad hoc sales).<sup>11</sup> Prices, costs and margins are the average for the quarter of data presented (usually a national average). Wholesale prices include handling and delivery costs but exclude all other taxes and charges to enable a simpler comparison with importer costs.<sup>12</sup>

## Wholesale prices and components

Table 1: Wholesale price changes (excl. taxes and charges)

Regular 91	↓	-6 cpl	-5%	Wholesale price changes from September 2023 to December 2023 quarter
Premium 95	↓	-6 cpl	-4%	
Premium 98	↓	-9 cpl	-6%	
Diesel	↓	-1 cpl	-1%	

Table 2: Wholesale prices (cpl, excl. taxes and charges) by fuel type from June 2022 quarter to December 2023 quarter

Fuel type	Jun 2022	Sep 2022	Dec 2022	Mar 2023	Jun 2023	Sep 2023 <sup>13</sup>	Dec 2023
Regular 91	155	140	122	120	118	128	122
Premium 95	164	150	131	130	129	139	133
Premium 98	178	162	145	147	145	156	147
Diesel	170	167	157	130	115	135	134

Source: Commerce Commission. Note: Wholesale prices are for fixed wholesale contracts only. TOSL is excluded to be consistent with other parts of the report.

Breakdowns of the components of contracted wholesale prices and trends over time are shown in Figure 1 to Figure 3 below.<sup>14</sup>

<sup>9</sup> Note that, while the ID data we analyse for the retail market represents importers selling to retail and commercial end user customers, the wholesale market data also includes sales to other importers, distributors and dealers. As such, retail prices cannot be directly tracked through from the wholesale chapter to the retail chapter of the report. Additionally, there can be a time lag between cost and/or pricing changes in the wholesale market being reflected in retail prices.

<sup>10</sup> The Fuel Industry Amendment Act 2023 came into effect on 27 July 2023, adding Part 2A “Price regulation of terminal gate prices” to the Fuel Industry Act 2020.

<sup>11</sup> Distributors and dealers as defined in s 4 of the Act, <https://www.legislation.govt.nz/act/public/2020/0060/latest/LMS358114.html>.

<sup>12</sup> Charges are costs over and above the price of fuel that are payable by the wholesale customer (excluding handling and delivery costs).

<sup>13</sup> The Premium 98 wholesale price for the September 2023 quarter was overstated in the previous report due to an error in the information disclosed to us. This has now been corrected.

<sup>14</sup> MBIE does not provide importer cost data for Premium 98 so the components of the Premium 98 price have not been produced.

Figure 1: Regular 91 average contracted price and components from June 2022 quarter to December 2023 quarter



Figure 2: Premium 95 average contracted price and components from June 2022 quarter to December 2023 quarter

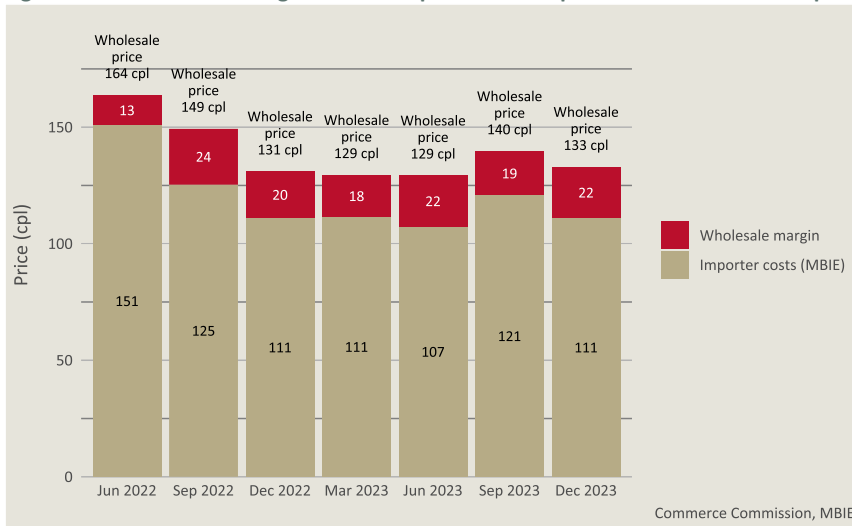


Figure 3: Diesel average contracted price and components from June 2022 quarter to December 2023 quarter



Wholesale margins are a useful metric to monitor the performance of the wholesale market as they can act as an indicator of either increased or reduced competition. A reduced wholesale margin can indicate an increase in competition whereas increases in the margin can indicate reduced competition. The wholesale margin is the difference between the cost to the importers of purchasing and landing fuel into New Zealand (importer costs) and the price (less taxes and charges) that importers receive for the fuel sold to wholesale customers.

Table 3: Wholesale margin changes

Regular 91	↑	3 cpl	27%	Wholesale margin changes from September 2023 to December 2023 quarter
Premium 95	↑	3 cpl	16%	
Diesel	↑	7 cpl	140%	



### Observations on wholesale prices and components

- Average wholesale prices decreased for petrol (Regular 91 and Premium grades) in the December 2023 quarter after the significant increases in the September 2023 quarter (see Table 2 above). Wholesale prices fell as importer costs reduced throughout the quarter to levels previously observed between the December 2022 and June 2023 quarters.
- Global oil prices initially increased following the start of the conflict in Israel and Gaza in October 2023. However, oil supply was not directly impacted and oil prices reduced from October to December 2023 amid a slowdown in demand growth for oil globally (see Attachment D, Figure 20 and Table 9 for importer costs).
- Wholesale margins for all fuel types were volatile when our monitoring commenced, with the Russia-Ukraine conflict contributing significantly to a spike in importer costs. Subsequently, wholesale margins have remained relatively stable. In the September 2023 quarter, importer costs increased putting pressure on wholesale margins.
- Importer costs have decreased in the December 2023 quarter, and wholesale margins have increased to earlier levels. In the December 2023 quarter, the wholesale margin:
  - for Regular 91 was 14 cpl, compared to yearly rolling averages of 12 cpl to 14 cpl.
  - for Premium 95 was 22 cpl, compared to yearly rolling averages of 19 cpl to 21 cpl.
  - for diesel was 12 cpl, compared to yearly rolling averages of 10 cpl to 12 cpl.<sup>15</sup>
- The most significant increase in wholesale margins was for diesel, with an 8 cpl decrease in costs and a wholesale price decrease of 1 cpl translating to a wholesale margin increase of 7 cpl. Although the increase from 5 cpl to 12 cpl was large, a wholesale margin of 12 cpl is consistent with a rolling average of 10 cpl to 12 cpl.
- We will continue to monitor changes in wholesale margin levels and consider what they might tell us about how competition is developing in the wholesale market. While we expect that prices in a competitive market should follow costs, we take a longer-term view of the market rather than focusing solely on short-term price fluctuations.

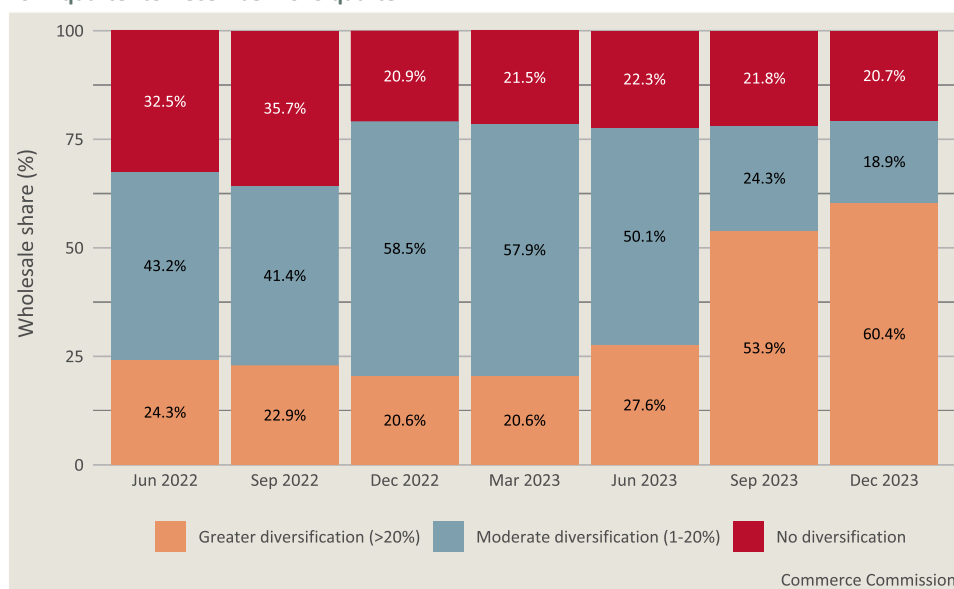
<sup>15</sup> A yearly rolling average is the average of four quarters. We present the range of averages as the lowest and highest yearly rolling averages since our monitoring commenced.

## Wholesale customers

Below, we focus on dealers and distributors as well as multi-sourcing of fuel supply. Approximately 80% of wholesale volumes sold by importers are to dealers and distributors. Typically, distributors are able to source their supply from more than one importer, whereas (with rare exceptions) dealers purchase from a single supplier and have no option to source from multiple suppliers. Sourcing fuel from more than one supplier can promote competition as wholesale customers can negotiate with multiple suppliers, potentially giving them greater leverage to obtain lower prices. The Regulations provide that no single contract may require a reseller (other than dealers) to purchase more than 80% of their fuel requirements from any one supplier in a year.<sup>16</sup>

We monitor any supplier switching and multi-sourcing taking place over time to provide insight on the impact of the Act and Regulations on the wholesale market.

Figure 4: The proportion of wholesale fuel volumes sourced by distributors from single or multiple suppliers from June 2022 quarter to December 2023 quarter



For a breakdown by different customer types (dealer, distributor, commercial end user and importer), see Attachment D Table 10 for wholesale prices and Table 11 for sales volumes.

For a breakdown of the components of the wholesale prices for dealers and distributors showing importer costs and wholesale margins, see Attachment D Table 12 for Regular 91 and Table 13 for diesel.

<sup>16</sup> Section 18 of the Act, reg 15 of the Regulations.





## Observations on wholesale customers

- Distributors buy approximately 50% of wholesale volumes and can shop around, unlike dealers who account for about 30% of wholesale volumes and are generally unable to source from multiple suppliers.<sup>17</sup>
- Figure 4 shows that distributors have sourced an increased proportion of fuel from more than one supplier since our monitoring began in June 2022. This diversification in supply is at the highest levels recorded since the Act was introduced, increasing from 68% to 79% of volumes purchased by distributors. This quarter, there was one additional distributor that increased its supply from moderately to greatly diversified, meaning that more than 20% of its fuel is sourced from another supplier. All other distributors remained in the same category as last quarter.
- We discussed the reasons why dealers generally pay higher wholesale prices than other wholesale customers in our previous quarterly report.<sup>18</sup> It is unclear the extent to which the higher prices and margins on dealer contracts can be attributed to higher costs incurred by importers as opposed to a more restrained negotiating position for dealers.

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<sup>17</sup> Dealers are the individual owners of dealer retail sites that carry the brand of a single fuel firm only and are generally contractually obligated to purchase all of their fuel requirements from that single fuel firm.

<sup>18</sup> Commerce Commission "Quarterly Fuel Monitoring Report – September 2023" (13 February 2024), p. 8, [https://comcom.govt.nz/data/assets/pdf\\_file/0017/343232/Quarterly-fuel-monitoring-report-Quarter-ending-30-September-2023-13-February-2024.pdf](https://comcom.govt.nz/data/assets/pdf_file/0017/343232/Quarterly-fuel-monitoring-report-Quarter-ending-30-September-2023-13-February-2024.pdf).

## Terminal gate pricing

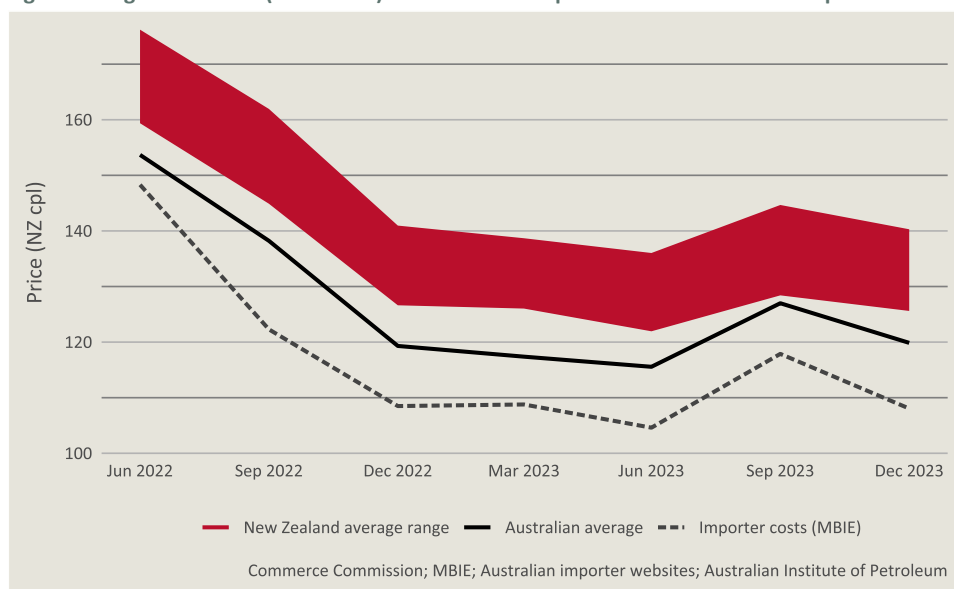
The terminal gate pricing regime under the Act was introduced to work together with the wholesale contract regulations to create the conditions for a more active wholesale fuel market in New Zealand. To achieve more transparent wholesale prices, the regime requires wholesale suppliers to post a TGP for each fuel type that it has the right to draw at a bulk storage facility.<sup>19</sup> See Attachment B for further information on the regime and our approach to monitoring TGPs.

Our analytical focus is to compare TGPs with importer costs and wholesale contract prices (rather than retail prices) as any movement towards these reference points could potentially lower retail prices, which in turn may increase competition.

Additionally, Australian TGPs are used as a reference point for what we might expect a workably competitive TGP market to look like. When comparing TGPs in Australia and New Zealand, we have removed the taxes that apply in each country to ensure a consistent comparison and have converted the Australian TGPs into New Zealand dollars.<sup>20</sup>

TGPs are the average for the quarter or month of data presented (shown as the average for the supplier or sometimes for New Zealand or Australia).

Figure 5: Regular 91 TGPs (excl. taxes) from June 2022 quarter to December 2023 quarter

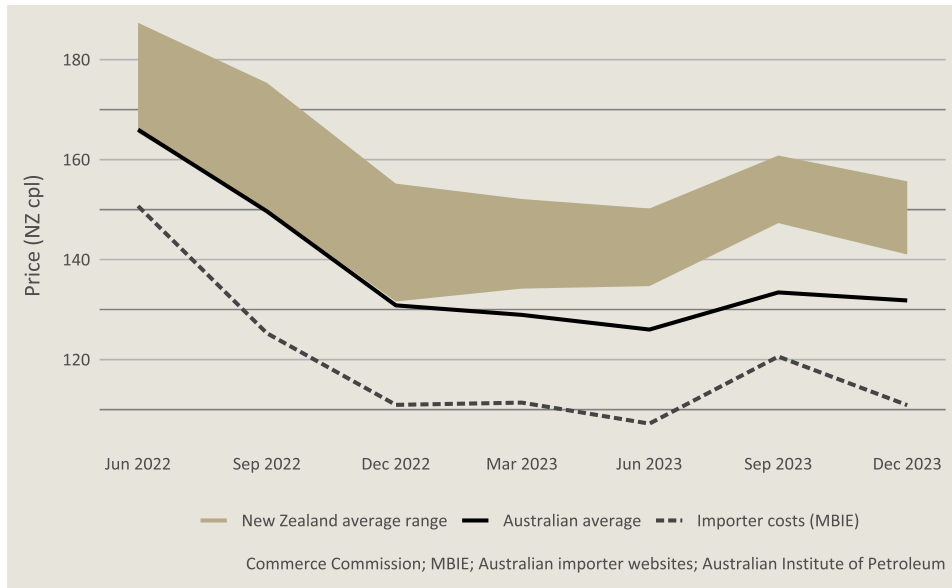


Note: The Australian TGP data covers the seven main port locations in Australia. The 'New Zealand average range' is the range of average TGPs by supplier as shown in Attachment B Table 6.

<sup>19</sup> See Part 2, subpart 1 of the Act.

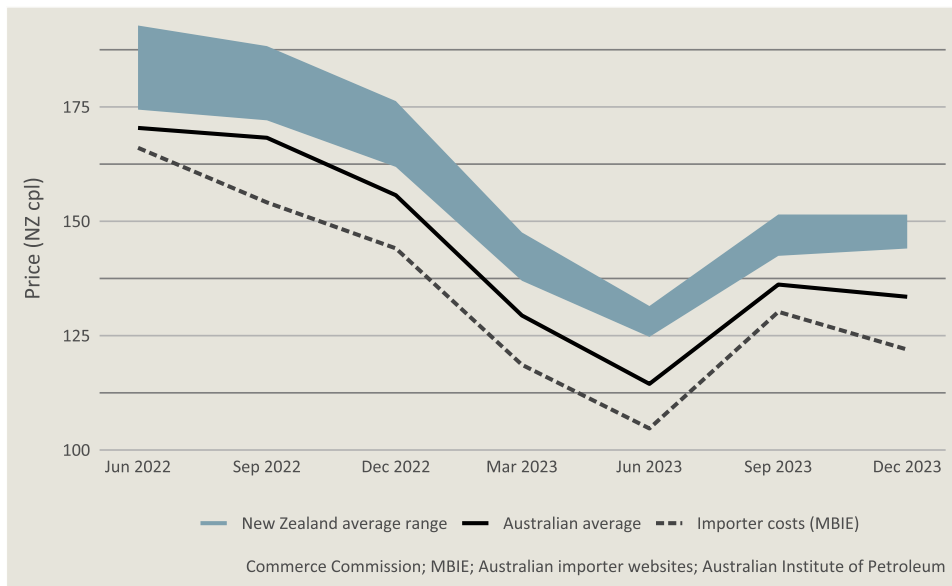
<sup>20</sup> For further details of the tax adjustments, see Attachment C.

**Figure 6: Premium 95 TGPs (excl. taxes) from June 2022 quarter to December 2023 quarter**



Note: The Australian TGP data covers the seven main port locations in Australia. The 'New Zealand average range' is the range of average TGPs by supplier as shown in Attachment B Table 6.

**Figure 7: Diesel TGPs (excl. taxes) from June 2022 quarter to December 2023 quarter**



Note: The Australian TGP data covers the seven main port locations in Australia. The 'New Zealand average range' is the range of average TGPs by supplier as shown in Attachment B Table 6.



## Observations on terminal gate pricing

- While we have not seen a significant number of ad hoc TGP sales since monitoring commenced, the TGP regime has a role in promoting competition by providing a publicly visible reference point that is used in a portion of the importers' wholesale contracts with their customers. The regime could also incentivise spot sales under existing contractual arrangements (rather than being formally sold under the TGP regime).<sup>21</sup>
- Figure 5 to Figure 7 above show the range of quarterly average TGPs by supplier in New Zealand:
  - Mobil again posted the highest TGPs for all fuel grades.
  - For Regular 91, the lower end of the spread has moved away from the Australian average in the December 2023 quarter (see Figure 5) after moving close to the Australian average in the September quarter 2023. Again, Z has the lowest average TGP in the latest quarter.
  - For Premium 95, the lower end of the spread had been moving away from the Australian average, but in the December 2023 quarter it reversed this trend and moved towards it. The range of average TGPs in New Zealand has been narrowing since our monitoring began (see Figure 6). Gull offered the lowest average TGPs for Premium 95 in the December 2023 quarter.
  - For diesel, the spread of average TGPs in New Zealand has been narrowing but remains consistently above the Australian average (see Figure 7), with Gull having the lowest average TGPs in the December 2023 quarter.
  - For more detail on TGPs by supplier, see Attachment B Table 6.
- TGPs in New Zealand continue to appear high relative to the cost of importing fuel into New Zealand (see Figure 5 to Figure 7 above and Attachment B Table 6, Figure 14 and Figure 15), and compared to TGPs observed in Australia (see Attachment B Figure 16). We note that, because Australian TGPs are subject to exchange rate conversion, exchange rate volatility may influence comparison between quarters.
- The TGP premium, the difference between TGPs and the average wholesale contract prices, has gradually been reducing over time for all fuel types (see Attachment B Figure 17 to Figure 19).

<sup>21</sup> In the June 2022 quarter, TGP sales amounted to 122,000 litres (0.014% of total wholesale sales), reducing to 41,000 litres in the September 2022 quarter. No sales have been recorded in the information disclosed to us since the March 2023 quarter.

# The retail fuel market

In this chapter we review competition in the retail market, summarising trends in retail fuel prices as well as importer costs and margins. Our analysis for these quarterly monitoring reports is based on the information disclosed to us by fuel importers (ID data).<sup>22</sup> That means our analysis of retail sites is confined to those sites that are operated or owned by importers and does not include independent operators, such as NPD and Waitomo. The five companies that currently import fuel into New Zealand are BP, Gull, Mobil, TOSL, and Z Energy.<sup>23</sup>

Importer costs are reported by MBIE, and the importer margin is the difference between the retail board price (less taxes and any discounts) and an importer’s cost to land fuel in New Zealand.<sup>24</sup> Prices, costs, discounts and margins are the average for the quarter of data presented (usually a national average, although the price variation analysis by cities uses city averages).

We present average prices or discounts weighted by volumes sold. This reflects the prices consumers actually paid and the market share of each importer, as well as the magnitude of their effect on the average prices and discounts.<sup>25</sup>

## Retail prices and components

Table 4: Retail price changes

Regular 91	↓	-2 cpl	-1%	Retail price changes from September 2023 to December 2023 quarter
Premium 95	↓	-2 cpl	-1%	
Premium 98	↓	-3 cpl	-1%	
Diesel	↑	8 cpl	4%	

Breakdowns of the components of the retail board price and trends over time are shown in Figure 8 to Figure 10 below.<sup>26, 27</sup>

<sup>22</sup> See reg 3 of the Regulations: ‘Fuel importer’ is defined as a fuel industry participant that imports fuel into New Zealand.

<sup>23</sup> TOSL provides exclusive supply to its related entity Tasman Fuels. Tasman Fuels is the entity that publishes TGPs. It also operates various retail fuel sites.

<sup>24</sup> We use the MBIE importer cost series to estimate the cost of importing fuel into New Zealand. This includes the cost of purchasing the fuel in Singapore, shipping it to New Zealand, insurance and losses, and wharfage and handling.

<sup>25</sup> Note that, for this and other quarterly reports, the size of the market discussed is limited to sales made by importers. This is because, under the Regulations, other operators of retail sites (such as distributors) are not required to disclose any sales information to us on a quarterly basis.

<sup>26</sup> The retail board price is the standard retail price of fuel for sale at a retail fuel site and displayed on a board, sign, or notice at the site.

<sup>27</sup> MBIE does not provide importer costs for Premium 98, so the components of the retail price have not been produced for Premium 98.

Figure 8: Regular 91 retail board price and components from June 2022 quarter to December 2023 quarter

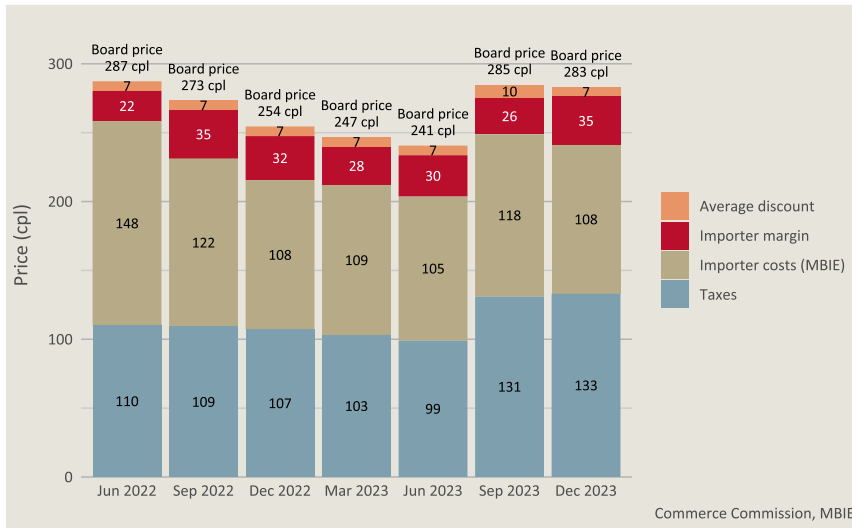


Figure 9: Premium 95 retail board price and components from June 2022 quarter to December 2023 quarter

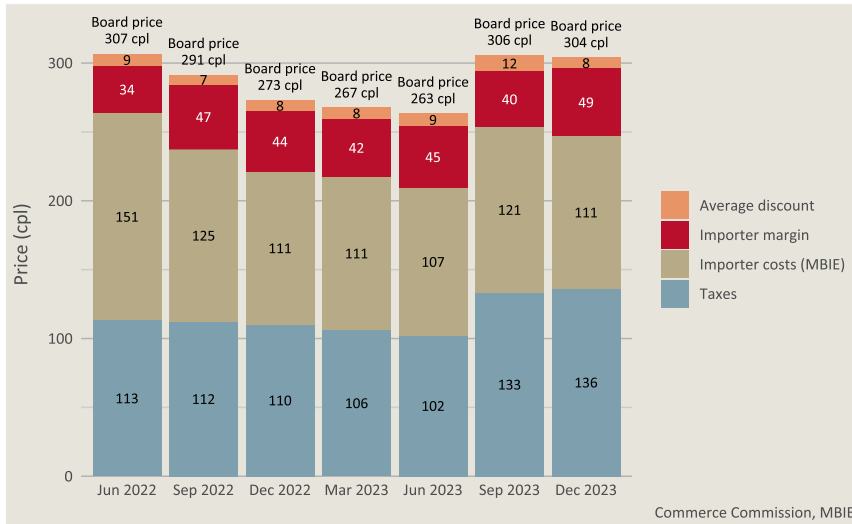


Figure 10: Diesel retail board price and components from June 2022 quarter to December 2023 quarter

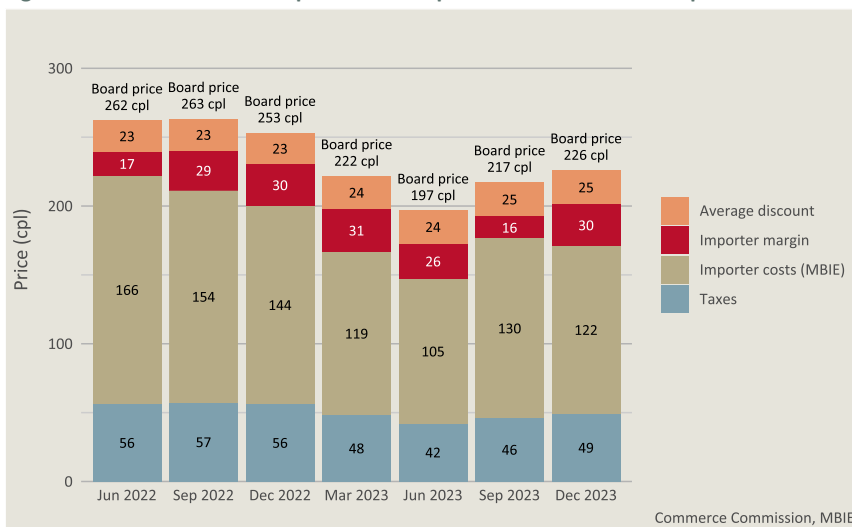


Table 5: Importer margin changes

Regular 91	↑	9 cpl	35%	Importer margin changes from September 2023 to December 2023 quarter
Premium 95	↑	9 cpl	23%	
Diesel	↑	14 cpl	88%	



## Observations on retail prices and components

- According to the information disclosed to us, retail prices decreased over the first five reporting quarters (from the June 2022 quarter to the June 2023 quarter). However, there was a large increase in retail prices in the September 2023 quarter when increases in global oil prices coincided with the increase in the fuel excise tax to its prior level. From 1 July 2023, this tax increase added 28.75 cpl to the retail price of petrol grades.<sup>28</sup> Road user charges and public transport charges also returned to pre-March 2022 levels as the government's transport relief package ended (the package had been in effect since 15 March 2022).
- In the December 2023 quarter:

### For Regular 91 and Premium 95

- The average retail board price was 2 cpl lower in the December 2023 quarter than the previous quarter, despite importer costs decreasing in the December quarter by 10 cpl.
- The importer margins were the highest they have been since the September 2022 quarter (35 cpl for Regular 91 and 49 cpl for Premium 95) and were 9 cpl higher than the previous quarter.
- The 35 cpl margin for Regular 91 was higher than yearly rolling averages of 29 cpl to 31 cpl.
- The 49 cpl margin for Premium 95 was higher than yearly rolling averages of 42 cpl to 45 cpl.<sup>29</sup>

### For diesel

- The retail board price and components were similar to that in the March 2023 quarter, with an average importer margin of about 30 cpl. The increase in the importer margin (from 16 cpl in the previous quarter) was predominantly due to an 8 cpl increase in the board price and an 8 cpl decrease in importer costs (with a small difference due to tax).
- The importer margin of 30 cpl was higher than yearly rolling averages of 26 cpl to 29 cpl.
- According to the ID data provided to us, average retail discounts on Regular 91 and Premium 95 have remained fairly stable at about 7 cpl to 8 cpl each quarter. The exception to this was an increase in the average discount in the September 2023 quarter to 10 cpl and 12 cpl, which was the same quarter that the full excise tax on petrol was restored.

<sup>28</sup> 25 cpl + GST = 28.75 cpl.

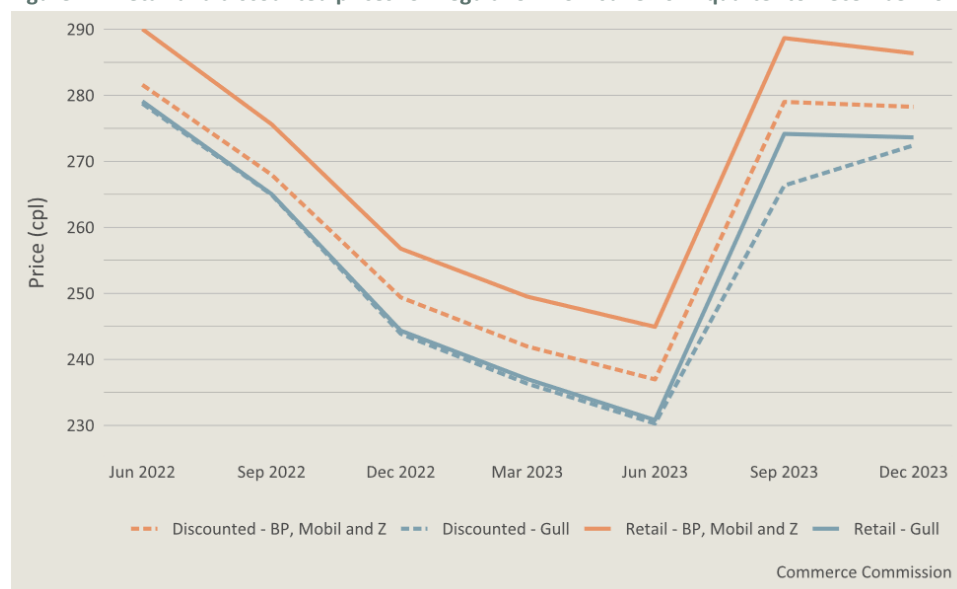
<sup>29</sup> A yearly rolling average is the average of four quarters. We present the range of averages as the lowest and highest yearly rolling averages since our monitoring commenced.

## Discount and loyalty programmes

We monitor discounting practices as discount and loyalty programmes can soften board price competition. Their use can create ‘customer stickiness’ to a brand and can focus consumer attention on the level of discount offered rather than on the actual price paid for fuel. This may reduce the likelihood that a consumer will shop around for the best deal. The resulting lack of mobility could have a negative impact on competition and limit the benefits to consumers.

A number of importers offer discount and loyalty programmes, which provide discounts off retail board prices using both cards and supermarket docket, eg, AA Smartfuel, Airpoints, Flybuys, Mobil Smiles, Z Pumped, and Foodstuffs (PAK’nSAVE and New World). The average level of discounts for each quarter is estimated using information disclosed to us, including revenue, volumes sold and retail board prices.

Figure 11: Retail and discounted prices for Regular 91 from June 2022 quarter to December 2023 quarter



Note: These average prices and discounts are not weighted by volumes sold.



### Observations on discount and loyalty programmes

- Each quarter, the average retail board price for Regular 91 has typically been higher at importer retail sites offering a loyalty programme (generally BP, Mobil and Z retail sites), compared to importer retail sites without a loyalty programme, such as those operated by Gull.<sup>30</sup> This continues to be the case in the December 2023 quarter (see Figure 11 above).
- Although sites offering a loyalty programme offer larger average discounts than Gull, typically Gull’s retail price is still lower than the loyalty programme discounted price, and Gull’s discounted prices are lower still.

<sup>30</sup> Due to how the discounts are structured and their accessibility to the public, the discounted fuel prices offered by Gull are not defined as discount and loyalty programmes under the Regulations.

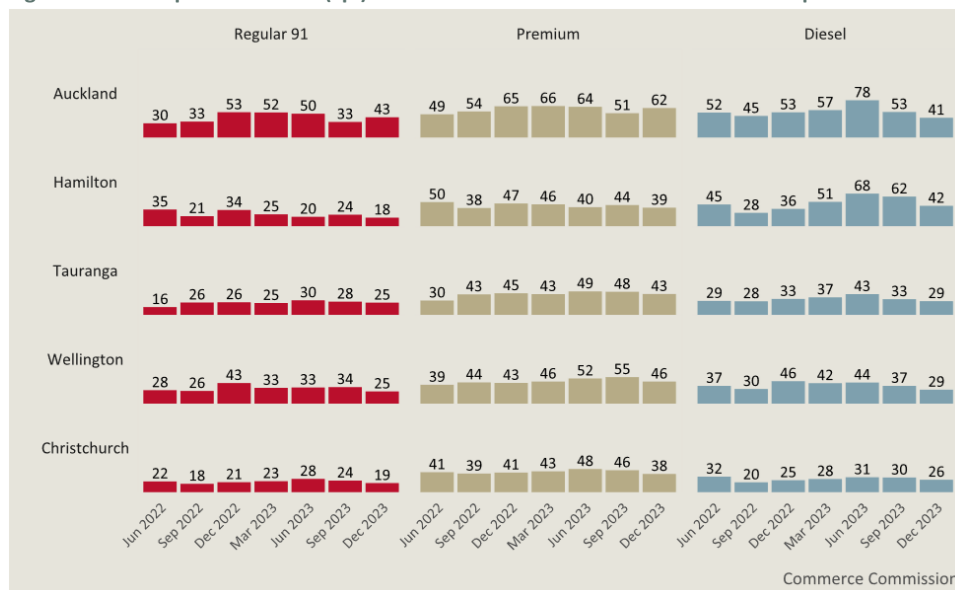


- We reiterate that discount and loyalty programmes may not result in the lowest retail price. Consumers are often better off choosing the retail site with the lowest board price or utilising one-off ‘discount days’.<sup>31</sup>

## Retail price variation in New Zealand

Retail price variation is calculated as the daily difference between the most and the least expensive site for each fuel type in a city, averaged over the quarter. The retail prices are discounted by average discounts and exclude the Auckland regional fuel tax. Military sites are excluded from the analysis.<sup>32</sup>

Figure 12: Retail price variation (cpl) within New Zealand cities from June 2022 quarter to December 2023 quarter



Note: Premium includes 95 and 98.



### Observations on retail price variation

- From Figure 12 above, we can see that Auckland still has the widest price variation for Regular 91 and Premium grades of petrol and is second to Hamilton for the highest variation for diesel. Although the price variation in Auckland reduced for Regular 91 and Premium grades of petrol in the September 2023 quarter, it increased again this quarter.
- All cities had a wide variation in prices for Premium grades ranging from 38 cpl to 62 cpl. For Regular 91, the variation ranged from 18 cpl in Hamilton to 43 cpl in Auckland. Diesel prices showed less variation this quarter compared to September 2023, but variations within cities were still wide, ranging from 26 cpl in Christchurch to 42 cpl in Hamilton.

<sup>31</sup> Commerce Commission “Quarterly Fuel Monitoring Report – June 2023” (6 December 2023), pp. 16–17, 37–39, [https://comcom.govt.nz/data/assets/pdf\\_file/0024/336714/Quarterly-fuel-monitoring-report-Quarter-ending-30-June-2023-.pdf](https://comcom.govt.nz/data/assets/pdf_file/0024/336714/Quarterly-fuel-monitoring-report-Quarter-ending-30-June-2023-.pdf).

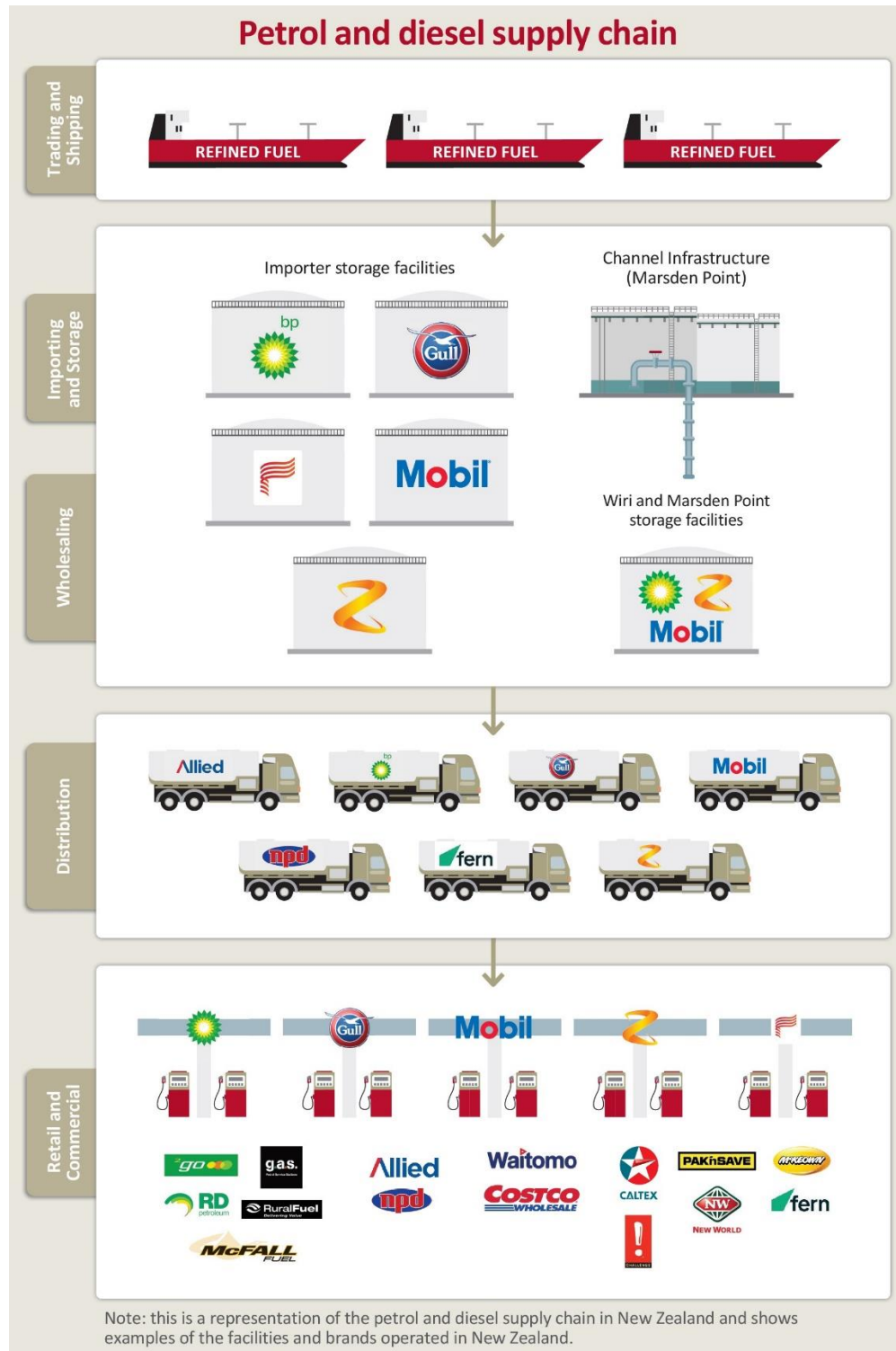
<sup>32</sup> New Zealand Army and Royal New Zealand Air Force sites, which are not accessible to the general public. Military sites were included in the analysis in some previous reporting. As a result, some city-wide price variations were overstated in those reports.

- Further, our analysis of discounted retail prices in the five largest cities shows that Tauranga had the lowest prices on average for Regular 91 and Premium grades (264 cpl and 288 cpl), with Wellington the most expensive for Regular 91 and Premium grades (273 cpl and 295 cpl). Christchurch had the lowest discounted diesel prices on average (195 cpl) and Auckland the most expensive (202 cpl). See Attachment D Table 14.
- Prices are influenced by the degree of competition in different locations, so it is not surprising to see some price variation between and within cities that is not simply related to the cost of supply. It appears that price differences within a city can also vary from quarter to quarter.

# Attachment A: New Zealand's fuel supply chain

Figure 13 below shows New Zealand's fuel supply chain and fuel industry participants from transporting and importing fuel into New Zealand to the wholesale, distribution and retail stages.

Figure 13: New Zealand's petrol and diesel supply chain



Source: Commerce Commission.

# Attachment B: The terminal gate pricing regime

The TGP regime was introduced to:

- allow the potential for a liquid wholesale spot market to develop,
- reduce barriers to entry and expansion for both importers and distributors,
- provide greater pricing transparency for wholesale customers to rebalance bargaining power and increase the likelihood of switching,
- provide transparent benchmark information for industry and government to reveal any use of market power in regions where importer competition is weak.<sup>33</sup>

The wholesale supplier must supply wholesale customers with their requested volumes at the supplier's TGP, unless the wholesale supplier has reasonable grounds to refuse to supply.<sup>34</sup> The price payable by the reseller must not exceed the TGP posted at the time of the request. Terminal gate pricing currently only applies to regular grade petrol (Regular 91), premium grade petrol (Premium 95) and diesel.<sup>35</sup>

## Our approach to monitoring TGPs

Over the last quarter, we have continued to monitor and compare the TGPs offered by each importer at the different terminal locations around New Zealand. We are building a picture of performance as more data becomes available over time.

In our analysis of TGP levels in New Zealand, we currently use several reference points to provide an indication of whether TGPs are at a level we would expect to see in a workably competitive market. These include:

- importer costs (the cost of importing fuel into New Zealand),
- fixed wholesale contract prices,
- retail prices, and
- TGPs in Australia (noting that Australia has a more mature regime with greater terminal competition).

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<sup>33</sup> Ministry of Business, Innovation and Employment "Response to the Commerce Commission's Retail Fuel Market Study: Fuel Industry Bill" (27 February 2020), <https://www.mbie.govt.nz/dmsdocument/11217-regulatory-impact-statement-fuel-industry-bill%20p.28>.

<sup>34</sup> Section 11 and 12 of the Act.

<sup>35</sup> See section 8(2) of the Act. Premium 98 is excluded under clause 4 of the Regulations as well as any diesel or petrol that contains more than 1.0% biofuel volume.

In our view, these provide useful and relevant points of reference and shed light on the progress of New Zealand's TGP regime for the following reasons.

- **Importer costs:** The costs of supplying fuel at the terminal gate are comprised of a number of components, including the cost of importing fuel into the port at which the terminal is located as well as the costs associated with building and operating the terminal facility. For the purposes of our monitoring, we have used MBIE's importer cost series as a reference point,<sup>36</sup> although we note that terminal-related costs are not included.
- **Fixed wholesale contract prices:** Wholesale contract prices are another reference point for TGP analysis. While these prices are based on similar costs to TGPs for the importers, wholesale contracts assure supply and therefore wholesale contract prices are lower than TGPs on average, as we would expect. However, the difference between wholesale contract prices and TGPs (the TGP premium) in New Zealand is larger than what is observed in Australia. Wholesale contract prices and TGPs in Australia are much closer than those in New Zealand.
- **Retail prices:** A comparison of TGPs with retail prices may reveal whether TGPs leave sufficient margin from retail board prices for an efficient competitor to compete.
- **TGPs in Australia:** We have also compared TGPs in New Zealand with TGPs in Australia, where there is a more mature TGP regime and greater terminal competition. As discussed below, we have made a number of adjustments when comparing TGPs in Australia and New Zealand to take into account differences in taxes in each country.<sup>37</sup>

TGPs that are closer to importer costs and wholesale contract prices in New Zealand, as well as Australian TGPs, are likely to enable TGPs in New Zealand to be a more viable option for potential purchasers of fuel.

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<sup>36</sup> MBIE, <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/energy-statistics-and-modelling/energy-statistics/weekly-fuel-price-monitoring>.

<sup>37</sup> We are also interested in any evidence of other cost-related differences that could explain some of the differences in TGPs between the two countries.

## TGPs by wholesale supplier

Table 6: New Zealand average TGPs by supplier compared to Australia and to importer costs from June 2022 quarter to December 2023 quarter

	Jun 2022	Sep 2022	Dec 2022	Mar 2023	Jun 2023	Sep 2023	Dec 2023
<b>Regular 91 (NZ cpl)</b>							
MBIE importer cost	148	122	108	109	105	118	108
Australian average	154	138	119	117	116	127	120
BP	170	152	135	136	132	141	135
Gull	165	149	132	129	128	138	131
Mobil	176	162	141	139	136	145	140
Tasman Fuels	159	145	127	128	125	134	130
Z	162	147	128	126	122	128	126
<b>Premium 95 (NZ cpl)</b>							
MBIE importer cost	151	125	111	111	107	121	111
Australian average	166	150	131	129	126	133	132
BP	179	161	143	148	145	154	147
Gull	174	158	142	139	137	147	141
Mobil	187	175	155	152	150	161	156
Tasman Fuels	165	150	132	134	135	148	143
Z	181	166	148	145	142	149	146
<b>Diesel (NZ cpl)</b>							
MBIE importer cost	166	154	144	119	105	130	122
Australian average	170	168	156	129	114	136	133
BP	188	182	171	146	131	150	148
Gull	179	175	166	140	126	145	144
Mobil	193	188	176	148	131	151	151
Tasman Fuels	174	172	162	137	125	147	146
Z	182	180	168	142	126	142	145

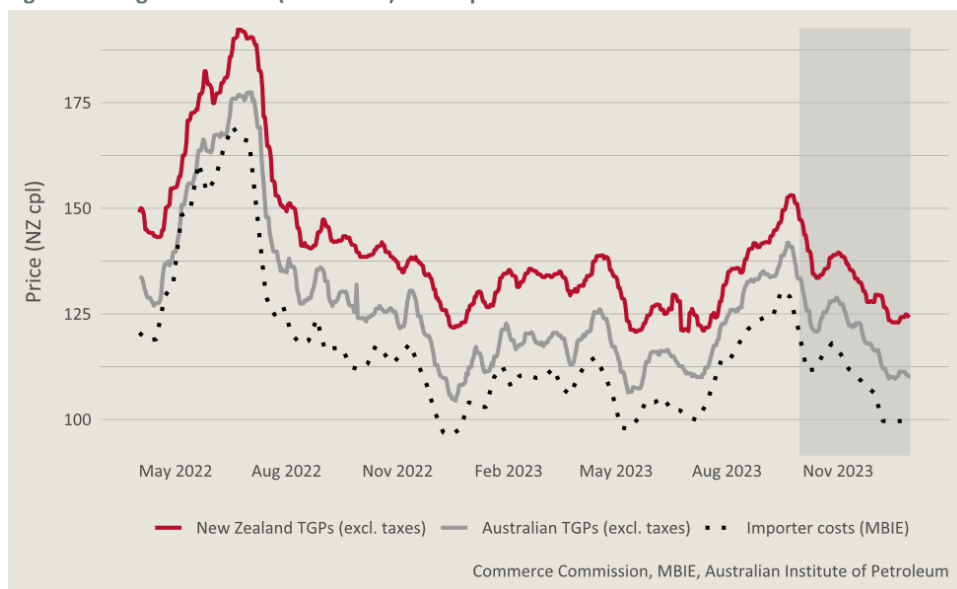
Source: Commerce Commission; MBIE; Australian importer websites; Australian Institute of Petroleum.

Note: The Australian TGP data covers the seven main port locations in Australia. The New Zealand average TGPs are calculated from ID data. From the December 2023 quarter we have enhanced our methodology to make the average TGPs more accurate. This has a minimal effect, if any, on the TGPs presented in previous reports.

## New Zealand and Australian TGPs and importer costs

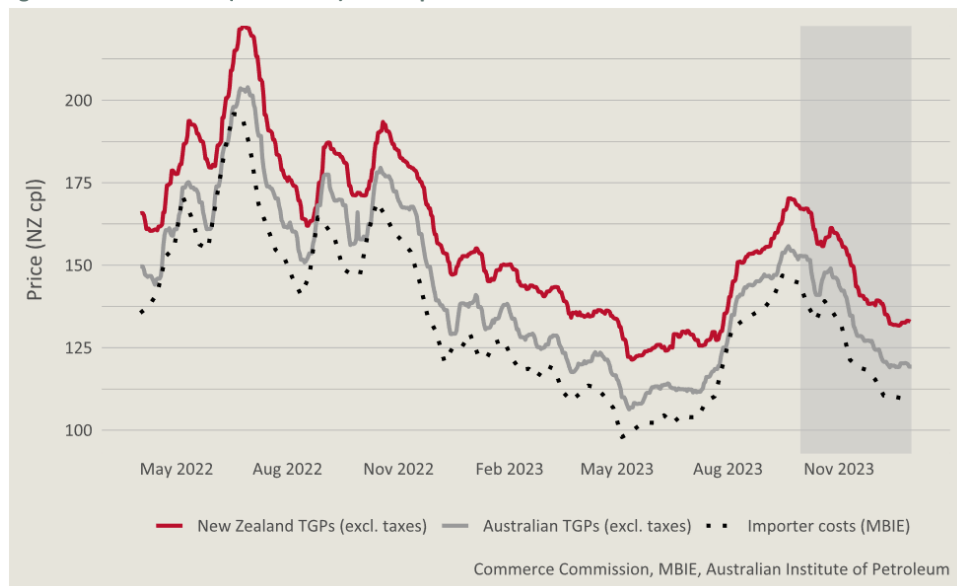
For our Australian comparison, we take a quarterly average of TGPs from the Australian Institute of Petroleum (AIP) for Regular 91 and diesel.<sup>38</sup> For Premium 95, we calculate the quarterly average TGP from four Australian importer websites at the same seven terminal locations used by the AIP (Sydney, Melbourne, Brisbane, Adelaide, Darwin, Perth and Hobart).

Figure 14: Regular 91 TGPs (excl. taxes) from April 2022 to December 2023



Note: Data for the December 2023 quarter is displayed in the grey area.

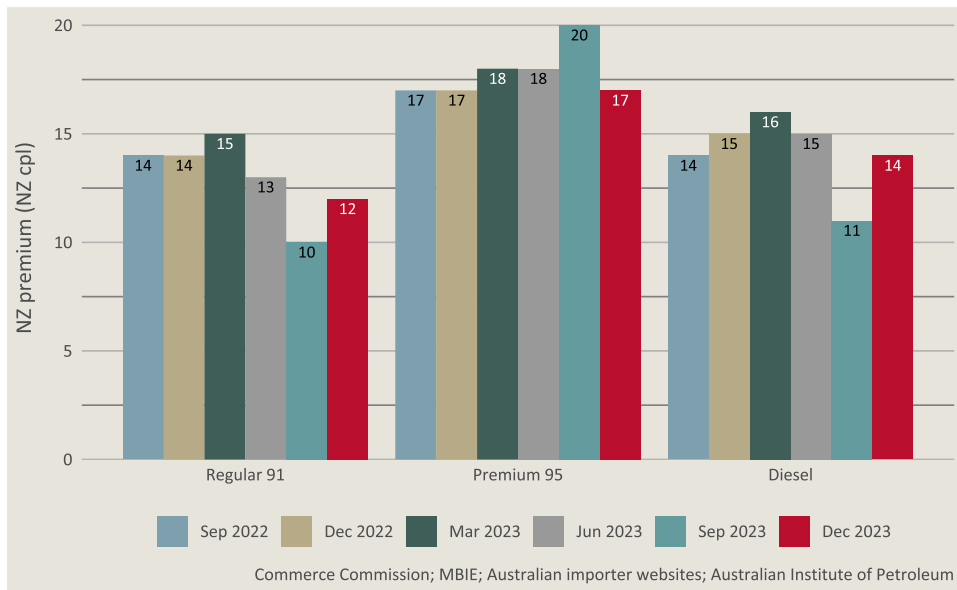
Figure 15: Diesel TGPs (excl. taxes) from April 2022 to December 2023



Note: Data for the December 2023 quarter is displayed in the grey area.

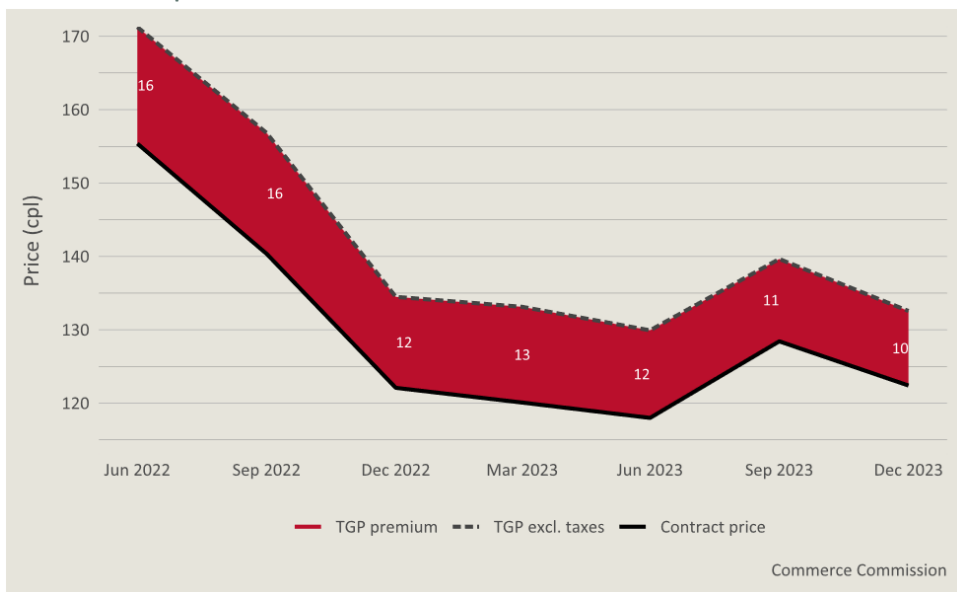
<sup>38</sup> Australian Institute of Petroleum, <https://www.aip.com.au>.

Figure 16: Difference between NZ TGPs and Australian TGPs from June 2022 quarter to December 2023 quarter



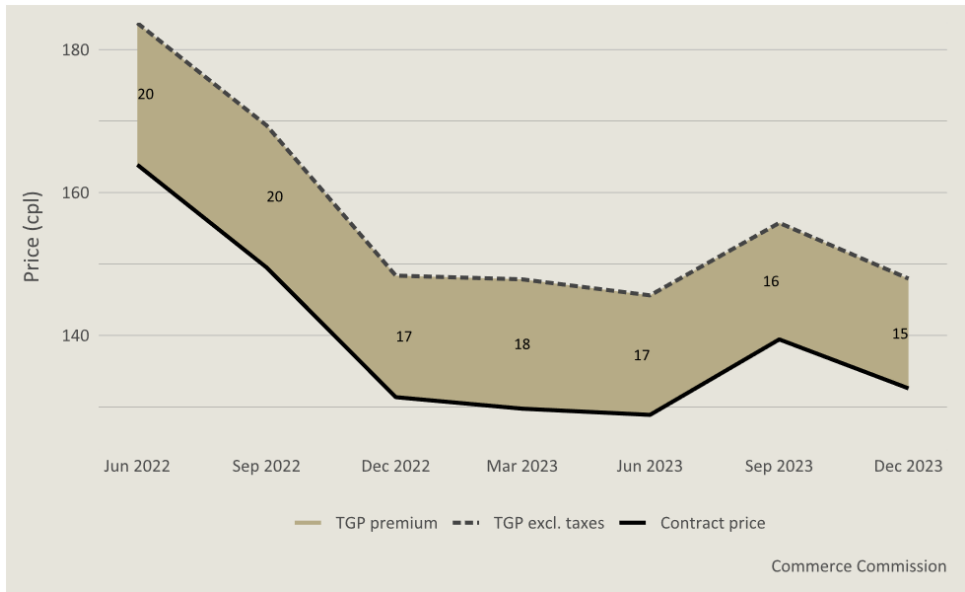
Note: The Australian TGP data covers the seven main port locations in Australia.

Figure 17: Regular 91 TGP offer price, average wholesale contracted price and TGP premium from June 2022 quarter to December 2023 quarter

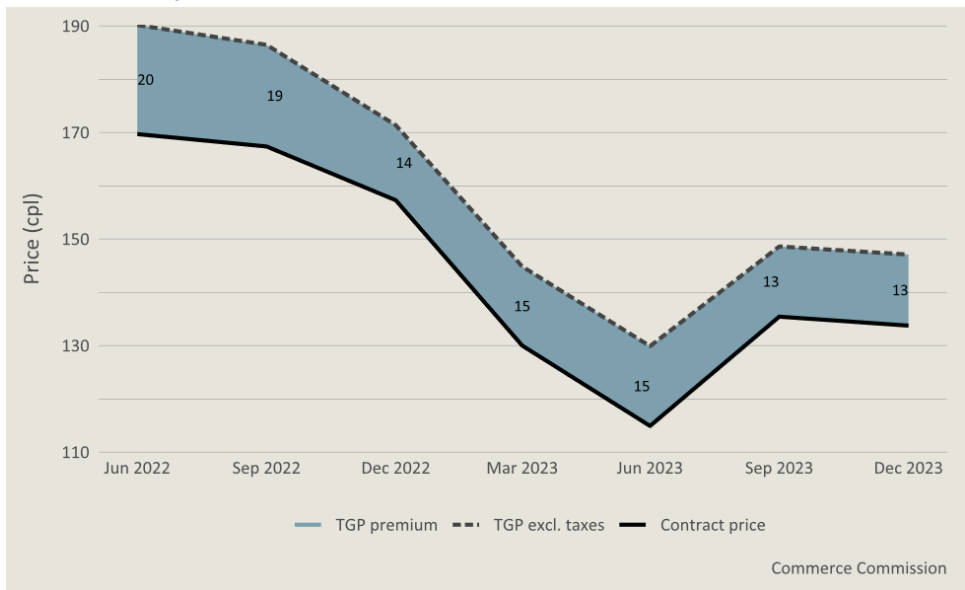




**Figure 18: Premium 95 TGP offer price, average wholesale contracted price and TGP premium from June 2022 quarter to December 2023 quarter**



**Figure 19: Diesel TGP offer price, average wholesale contracted price and TGP premium from June 2022 quarter to December 2023 quarter**



# Attachment C: Relevant taxes, costs and levies

To ensure TGP comparisons are consistent between New Zealand and Australia and within New Zealand, we have adjusted TGPs to exclude taxes and levies in all fuel types. The tables below summarise the taxes, levies and ETS costs that we have used to adjust TGPs in both countries.

Table 7: New Zealand taxes, levies and ETS costs applicable to fuel types for the quarter ended December 2023

New Zealand (cpl)			
	Regular 91	Premium 95	Diesel
National Land Transport Fund (NLTF) <sup>39</sup>	70.02	70.02	-
ACC levy <sup>40</sup>	6.00	6.00	-
Petroleum or engine fuel monitoring levy <sup>41</sup>	0.72	0.72	0.72
Local authority fuel tax	0.66	0.66	0.33
Regional fuel tax (Auckland) <sup>42</sup>	10.00	10.00	10.00
ETS costs	MBIE estimates	MBIE estimates	MBIE estimates
GST	15%	15%	15%

Source: MBIE, <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/energy-generation-and-markets/liquid-fuel-market/duties-taxes-and-direct-levies-on-motor-fuels-in-new-zealand/>; <https://www.mbie.govt.nz/assets/Data-Files/Energy/Weekly-fuel-price-monitoring/weekly-table.csv>; Inland Revenue, <https://www.ird.govt.nz/gst>.

Table 8: Australian taxes applicable to fuel types

Australia (Australian cpl)			
	Regular 91	Premium 95	Diesel
Excise tax (up to 1 August 2023)	47.7	47.7	47.7
Excise tax (from 1 August 2023)	48.8	48.8	48.8
GST	10%	10%	10%

Source: Australian Taxation Office, <https://data.gov.au/data/dataset/0aa77454-d0f6-4499-b0a4-88dbdeee95d1/resource/b9227cdf-4c04-492d-bd84-65031adc408e/download/historialexciserates-29-sep-22.xlsx>; <https://www.ato.gov.au/business/gst>.

We have used daily exchange rates from the Reserve Bank of New Zealand to convert Australian TGPs into New Zealand currency.<sup>43</sup>

<sup>39</sup> The NLTF rate was reduced from 70.02 cpl to 45.02 cpl from 15 March 2022 to 30 June 2023.

<sup>40</sup> ACC "Paying levies if you own or drive a vehicle", <https://www.acc.co.nz/about-us/our-levies/paying-levies-if-you-own-or-drive-a-vehicle>.

<sup>41</sup> NZ Gazette "Notification of Levy Rates Under the Energy (Petrol, Engine Fuel, and Gas) Levy Regulations 2017 Notice 2023", <https://gazette.govt.nz/notice/id/2023-go2283>. The levy changed on 1 July 2023 from 0.65 cpl.

<sup>42</sup> NZTA "Regional fuel tax", <https://www.nzta.govt.nz/vehicles/regional-fuel-tax>.

<sup>43</sup> Reserve Bank of New Zealand "Exchange rates and Trade Weighted Index" (6 July 2023), <https://www.rbnz.govt.nz/statistics/series/exchange-and-interest-rates/exchange-rates-and-the-trade-weighted-index>.

# Attachment D: Data

## Importer costs

The cost of crude oil and importer costs and trends over time are shown in Figure 20. Data for the latest quarter is displayed in the grey area.

Figure 20: Importer costs and the cost of crude oil (cpl) by fuel type from January 2022 to December 2023

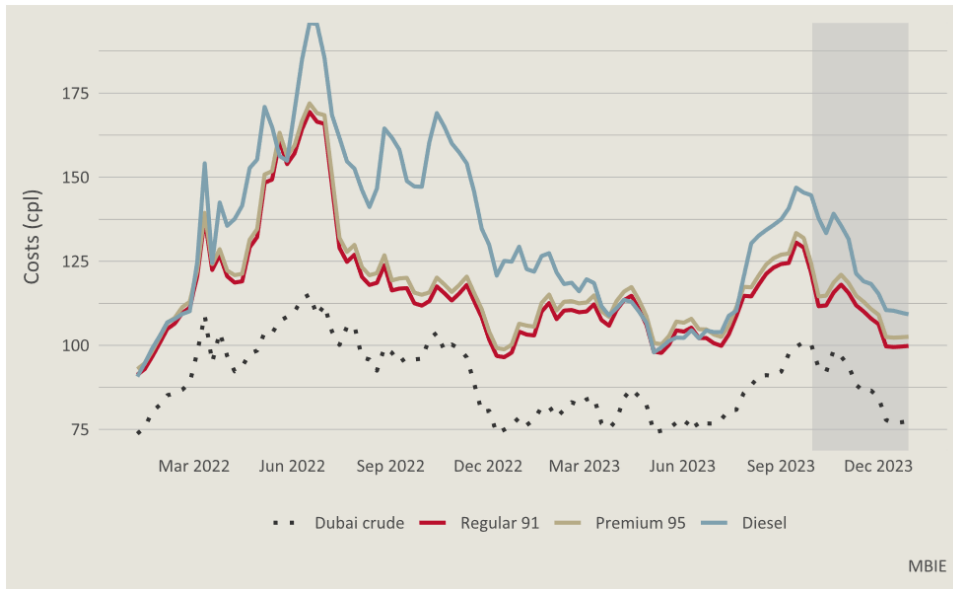


Table 9: Importer costs (cpl) by fuel type from June 2022 quarter to December 2023 quarter

Fuel type	Jun 2022	Sep 2022	Dec 2022	Mar 2023	Jun 2023	Sep 2023	Dec 2023	Sep 2023 to Dec 2023 change	
								Absolute	Relative (%)
Regular 91	148	122	108	109	105	118	108	-10	-8
Premium 95	151	125	111	111	107	121	111	-10	-8
Diesel	166	154	144	119	105	130	122	-8	-6

Source: MBIE. Small differences in the absolute change figures are due to rounding.

## Wholesale market

Table 10: Average wholesale prices (excl. taxes and charges) by fuel type and customer type, all sale types, from June 2022 to December 2023 quarters

Customer	Jun 2022	Sep 2022	Dec 2022	Mar 2023	Jun 2023	Sep 2023	Dec 2023	Sep 2023 to Dec 2023 change	
								Absolute	Relative (%)
<b>Regular 91 price (cpl)</b>									
Dealer	160	145	128	126	124	135	128	-7	-5
Distributor	152	136	117	115	114	124	118	-6	-5
End user	150	141	136	130	129	143	130	-13	-9
Importer	149	134	115	112	110	120	117	-3	-2
<b>Premium 95 price (cpl)</b>									
Dealer	172	158	140	140	138	148	141	-8	-5
Distributor	159	144	125	123	123	134	128	-7	-5
End user	159	153	149	144	143	157	147	-10	-7
Importer	153	140	122	119	119	130	125	-4	-3
<b>Premium 98 price (cpl)</b>									
Dealer	178	163	146	148	146	157	148	-9	-6
Distributor	176	155	135	139	138	148	139	-9	-6
End user	181	154	140	138	141	155	147	-8	-5
<b>Diesel price (cpl)</b>									
Dealer	175	172	162	138	122	141	138	-4	-3
Distributor	168	166	156	127	112	133	132	-1	-1
End user	168	168	155	131	116	137	134	-2	-2
Importer	164	165	156	126	111	130	134	4	3

Source: Commerce Commission. Note: Prices include handling and delivery costs. The Premium 98 price for the September 2023 quarter was overstated in the previous report due to an error in the information disclosed to us. This has now been corrected. Small differences in the absolute change figures are due to rounding.

Table 11: Total wholesale volume sold (in million litres) by customer type from June 2022 to December 2023 quarters

Customer	Jun 2022	Sep 2022	Dec 2022	Mar 2023	Jun 2023	Sep 2023	Dec 2023	Share (%)
Dealer	283	292	321	310	296	273	310	27
Distributor	401	481	547	534	529	526	612	53
End user	113	63	53	57	43	43	84	7
Importer	49	111	158	160	151	135	153	13
<b>Total</b>	<b>846</b>	<b>946</b>	<b>1,079</b>	<b>1,061</b>	<b>1,020</b>	<b>977</b>	<b>1,159</b>	<b>100</b>

Source: Commerce Commission. Note: TOSL volumes have been excluded from this table to be consistent with other parts of the report. Prices include handling and delivery costs.

Table 12: Regular 91 average contracted price and components (excl. taxes and charges) for dealers and distributors from June 2022 to December 2023 quarters

Type	Jun 2022	Sep 2022	Dec 2022	Mar 2023	Jun 2023	Sep 2023	Dec 2023
Dealer contract price	160	145	128	126	124	135	128
Distributor contract price	152	136	117	115	114	124	118
Margin on dealer contract	12	23	19	17	19	17	20
Margin on distributor contract	4	14	9	6	9	6	10
Importer costs (MBIE)	148	122	108	109	105	118	108

Source: Commerce Commission. Note: Prices include handling and delivery costs.

Table 13: Diesel average contracted price and components (excl. taxes and charges) for dealers and distributors from June 2022 to December 2023 quarters

Type	Jun 2022	Sep 2022	Dec 2022	Mar 2023	Jun 2023	Sep 2023	Dec 2023
Dealer contract price	175	172	162	138	122	141	138
Distributor contract price	168	166	156	127	112	133	132
Margin on dealer contract	9	18	18	19	17	11	16
Margin on distributor contract	2	11	12	8	8	3	10
Importer costs (MBIE)	166	154	144	119	105	130	122

Source: Commerce Commission. Note: Prices include handling and delivery costs.

## Retail price variation in New Zealand

Table 14: Discounted retail prices (cpl) in New Zealand cities and nationally, September 2023 quarter and December 2023 quarter

September 2023 quarter				December 2023 quarter			
Location	Regular 91	Premium	Diesel	Location	Regular 91	Premium	Diesel
Auckland	271	293	191	Auckland	271	294	202
Hamilton	265	283	189	Hamilton	271	290	196
Tauranga	264	287	187	Tauranga	264	288	197
Wellington	272	293	185	Wellington	273	295	197
Christchurch	269	287	186	Christchurch	272	292	195
<i>Price variation between cities</i>	8	10	6	<i>Price variation between cities</i>	9	7	7
Rest of NZ	272	294	191	Rest of NZ	274	296	199
<b>National</b>	<b>271</b>	<b>293</b>	<b>190</b>	<b>National</b>	<b>272</b>	<b>294</b>	<b>199</b>

Source: Commerce Commission. Note: Premium includes 95 and 98. Prices are weighted average discounted prices and exclude the ARFT.

## Attachment E: Glossary

Term	Explanation
<b>the Act</b>	Fuel Industry Act 2020.
<b>ARFT</b>	Auckland regional fuel tax.
<b>BP</b>	BP Oil New Zealand Limited.
<b>bulk storage facility</b>	As defined in the Act, means a facility for the storage of 5 million litres or more of engine fuel. <sup>44</sup> Also known as a terminal.
<b>cpl</b>	Cents per litre.
<b>Commission</b>	New Zealand Commerce Commission.
<b>dealer</b>	As defined in the Act, means a reseller that sells and supplies engine fuel through its own retail fuel sites using a brand owned by another person that is not an interconnected body corporate of the reseller.
<b>diesel</b>	As set out in the Regulations, diesel has the same meaning as in <a href="#">regulation 5(1)</a> of the Engine Fuel Specifications Regulations 2011. Diesel (a) means a refined petroleum distillate, or other liquid hydrocarbon fuel, having a viscosity and distillation range that is intermediate between those of kerosene and light lubricating oil, whether or not it contains additives, and that is intended for use as fuel in compression-ignition internal combustion engines; and (b) includes diesel containing up to 5% bio-diesel by volume.
<b>discount and loyalty programmes</b>	As defined in the Regulations, means a recurring or ongoing programme that provides retail customers with discounts off the standard retail price, or non-fuel related benefits provided by the fuel importer or another entity, or both.
<b>distributor</b>	As defined in the Act, means a reseller that is not a dealer.
<b>Dubai crude</b>	The price of Dubai crude oil is used internationally as a price benchmark.
<b>end user</b>	As defined in the Act, in relation to engine fuel, means a person who is the ultimate consumer of that engine fuel.
<b>ETS costs</b>	Means New Zealand emissions trading scheme costs under the Climate Change Response Act 2002.
<b>fixed wholesale contract</b>	As defined in the Act, means a wholesale contract that governs,— (a) (i) for a fixed period, the wholesale price and other conditions of sale and supply of engine fuel during the period; or (ii) for a fixed amount of engine fuel, the wholesale price and other conditions of sale and supply for that engine fuel; but (b) does not include a wholesale contract for the sale and supply of engine fuel under the terminal gate pricing regime in subpart 1 of Part 2.
<b>fuel</b>	Petrol and diesel fuels (unless specified otherwise).
<b>fuel industry participant</b>	As defined in the Act, means a person that purchases, or sells and supplies, engine fuel other than as — (a) an end user; or (b) an incidental part of the hiring, leasing, or selling of motor vehicles.
<b>GST</b>	Goods and services tax.
<b>Gull</b>	Gull New Zealand (NZ) Limited.

<sup>44</sup> Terms are defined in the 'Interpretation' section of the Act (see section 4).

Term	Explanation
<b>importer</b>	Refers to 'fuel importer' as defined in regulation 3 of the Regulations: a fuel industry participant that imports fuel into New Zealand. We use this term throughout the report to refer to BP, Mobil, Z Energy, Gull, and TOSL.
<b>importer cost</b>	The cost per litre, by fuel type, that a fuel importer incurs in order to import fuel into its respective New Zealand domestic port/fuel terminal.
<b>importer margin</b>	The difference between the importer cost and the retail price of fuel at a retail service station.
<b>ID</b>	Information disclosure/information disclosed (pursuant to the Regulations).
<b>market study</b>	Commerce Commission's 2019 retail fuel market study looking into the factors that may affect competition for the supply of retail petrol and diesel used for land transport throughout New Zealand.
<b>MBIE</b>	Ministry of Business, Innovation and Employment.
<b>Mobil</b>	Mobil Oil New Zealand Limited.
<b>NLTF</b>	National Land Transport Fund.
<b>OECD</b>	The Organisation for Economic Co-operation and Development.
<b>OPEC</b>	Organisation of the Petroleum Exporting Countries.
<b>OPEC+</b>	The 13 OPEC nations plus 10 other oil-producing countries.
<b>Premium 95</b>	As set out in the Regulations, premium grade petrol has the same meaning as in <a href="#">regulation 5(1)</a> of the Engine Fuel Specifications Regulations 2011. Petrol supplied as having a research octane number of 95.0 or higher.
<b>Premium 98</b>	As set out in the Regulations, premium grade petrol has the same meaning as in <a href="#">regulation 5(1)</a> of the Engine Fuel Specifications Regulations 2011. Petrol supplied as having a research octane number of 98.0 or higher.
<b>price board</b>	As defined in the Regulations, means a board, sign, or notice at a retail fuel site that displays the prices of types of engine fuel for retail sale at the site.
<b>Regulations</b>	Fuel Industry Regulations 2021.
<b>Regular 91</b>	As set out in the Regulations, regular grade petrol has the same meaning as in <a href="#">regulation 5(1)</a> of the Engine Fuel Specifications Regulations 2011. Petrol supplied as having a research octane number of at least 91.0 but less than 95.0.
<b>reseller</b>	As defined in the Act, means (a) a person that purchases, or intends to purchase, engine fuel from a wholesale supplier to sell and supply to another person; but (b) does not include a person that does so, or intends to do so, only as an incidental part of their business.
<b>retail fuel site</b>	As defined in the Act, (a) means a place at which engine fuel is sold and supplied to an end user (eg, a petrol station or a truck stop); but (b) does not include a place at which the primary business is the hiring, leasing, or selling of motor vehicles, and (c) does not include a bulk storage facility.
<b>road user charges (RUC)</b>	A charge paid by drivers that contributes towards the upkeep of New Zealand roads.
<b>Tasman Fuels</b>	Tasman Fuels Limited.
<b>terminal gate price (TGP)</b>	As per section 9 of the Act, a wholesale supplier must publicly post a price (terminal gate price) for each specified engine fuel that it has the right to draw at a bulk storage facility for the specified engine fuel.

<b>Term</b>	<b>Explanation</b>
<b>TGP premium</b>	The premium that a customer may pay to buy the TGP at a port against the average wholesale contract price at that port.
<b>TOSL</b>	Timaru Oil Services Limited.
<b>wholesale contract</b>	As defined in the Act, a contract between a wholesale supplier and a reseller for the sale and supply of engine fuel.
<b>wholesale margin</b>	The difference between the cost to the importer of purchasing, landing and storing fuel into New Zealand-based terminals (importer costs) and the price (less taxes and charges) the importer receives for the fuel sold to a wholesale customer.
<b>wholesale supplier</b>	As defined in the Act, a person that sells and supplies engine fuel, as the whole or part of its business, to persons other than end users.
<b>Z</b>	Z Energy Limited.