



6 April 2021

**RE: emsTradepoint Force Majeure Consultation**

Dear Cathy,

Thank you for the chance to consult on this possible change in the FM rules. Greymouth support the proposal in principle. Our comments on your questions are as follows:

*Question 1: Do you agree that FM on the exchange should align more closely with GSAs?*

- Agree

*Question 2: Do you agree that FM should be made available OTD and linked to the next available ID cycle?*

- Agree

*Question 3: Do you agree that Participants should retain their obligation to manage their nominations under OATIS?*

- Agree

*Question 4: Which of the two options do you agree with for handling OTD trades? Are there alternative ways of handling curtailments?*

- We support allowing FM to be called for OTD trades.

*Question 5: Do you agree with the timeframes for trades to be included as approved and for FM events to be notified?*

- Agree

*Question 6: To what extent do you think FM events might increase if we make this change, and do you think this could undermine the credibility of the market?*

- If emsTradepoint validate all FM events, we believe there will be no loss of credibility to the market.

*Question 7: Should emsTradepoint validate all FM events?*

- Agree

Yours sincerely

Charlie Wilton