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4 November 2005

Gas Industry Co  
PO Box 10-646  
Wellington

Attention: Simon Bratt

### **Submission on Proposed Switching Arrangement**

Thank you for the opportunity to respond to your invitation to comment on the consultation paper: Options for Switching Arrangements for the New Zealand Gas Industry dated October 2005.

The office of the Electricity and Gas Complaints Commissioner investigates and resolves complaints from customers of electricity and gas providers. Gas complaints have been part of the scheme since April 2005. Many of my comments stem from my awareness of the difficulties with the electricity registry in its early days and the effect it had on consumers.

Please note that my views do not necessarily reflect those of the Electricity and Gas Complaints Commission or members of the scheme.

I support the development of a central gas registry which records core verified ICP and switching information.

**Q13:** *Do you agree with the proposed ICP parameters for the registry?*

I note the registry parameters includes address data based on the NZ Post standard. I think it would be useful to carefully consider what the registry's needs are around address data in relation to the accurate capturing of the physical location of the property.

It is my understanding that it is the local authority's responsibility to allocate addresses throughout New Zealand. These reflect the physical location of the property. The NZ Post addressing standard, on the other hand, relates to where people receive their mail. In most case, these will be the same but not all.

My office has dealt with a number of complex complaints which have arisen from the fact that:

- The address used by the electricity lines company to populate MARIA has been based on what the builder or developer has advised rather than the address allocated by the local authority and used by the occupier
- The occupier uses the address on the letterbox when the address in MARIA is the council allocated one or vice versa.

Problems are particularly prevalent where there are new infill / multi unit developments (including apartment blocks) or in rural areas.

What may be useful is to allow for some free text in the description field. For example, this would allow for the ability to identify the installation as being at the rear flat.

The proposal sets out that the GMS parameters are to include the Meter Identifier. It may be useful to include “number of meters” per ICP and then check this detail with the customer. We have found that it is not unusual for an instruction to switch an electricity ICP to exclude meters that the customer/company is not aware of. While this is unlikely to be so common with gas meters, it may occur where the property includes both residential and commercial premises.

The location of meters is another piece of information that is important in ensuring consumption data is maintained accurately, and it might be worth including a field for this.

I suggest that the registry data should be verified by the customer as part of the creation process.

**Q15:** *To what extent do you agree with the proposed switching information exchange process?*

We support the new retailer’s ability to request the last twelve months meter reading history. This will be helpful in determining usage for gas estimates going forward.

### **Other comments**

The paper does not make clear how orphaned ICPs will be managed. I am aware of an apartment building which has not been billed for three years despite attempts to locate the retailer.

Please contact me if you would like to discuss this matter further.

Yours sincerely

Judi Jones  
Electricity and Gas Complaints Commissioner