

# Appendix A Submission template

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Submission prepared by: Contact Energy

QUESTION	COMMENT
Q1: Do you agree that the current guideline in relation to rule 37 of the Reconciliation Rules should be used as the threshold for reporting of breaches under the amended Regulations?	We agree.
Q2: Do you agree that the proposed threshold for rules 67.3, 70.2 and 72.2 of the Switching Rules should be applied for reporting breaches under the amended Regulations?	We agree. We note that if a participant is adversely impacted by a persistent and unexplained breach, it can always allege a breach and provide supporting information for consideration by the Market Administrator.
Q3: Do you agree that the proposed threshold for rules 69.1 and 69.2 of the Switching Rules should be applied for reporting breaches under the amended Regulations?	We agree. We do see a minor gap with respect to switch withdrawals and switch read changes which could easily fall under the same category, as breaches are typically technical and have little or no impact, and would benefit from not requiring a formal investigation and response which is quite time consuming. Accordingly we consider Gas Industry Co should include a one day threshold exemption for the registry operator to allege a breach for rules 78 (Retailer response to a gas switching withdrawal notice) and 81 (Retailer response to switch reading renegotiation request) where in the absence of any other information there is no likelihood this will raise a material issue.