

# Appendix A Template for Submissions

To assist Gas Industry Co in the orderly and efficient consideration of submitters’ responses, a suggested format for submissions has been prepared an electronic copy of which is available on our website. This is drawn from the questions posed throughout this Consultation Document. Submitters are also invited to include any other comments in their responses to this Consultation Document

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QUESTION	COMMENT
<p>Q1: In regard to the proposal to amend rule 5 and Schedule part A definitions:</p> <ul style="list-style-type: none"> <li>• Do you agree or disagree with the proposals? Please provide reasons.</li> <li>• Do you have any comments on the specific drafting proposed?</li> <li>• Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</li> </ul>	<p>Agree with the proposals.            No comments on the specific drafting proposed.            Agree that the proposal meets the requirements of section 43N(3) of the Act.</p>
<p>Q2: In regard to the proposal to amend rules 24 and 25 in respect of the payment of ongoing fees:</p> <ul style="list-style-type: none"> <li>• Do you agree or disagree with the proposals? Please provide reasons.</li> <li>• Do you have any comments on the specific drafting proposed?</li> <li>• Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</li> </ul>	<p>Agree with the proposals.            No comments on the specific drafting proposed.            Agree that the proposal meets the requirements of section 43N(3) of the Act.</p>
<p>Q3: In relation to the proposals to amend rules 28.1, 29, 30 and 31, and insert new rule 31.1.3:</p>	<p>Agree with the proposals.</p>

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<ul style="list-style-type: none"> <li>Do you agree or disagree with the proposals? Please provide reasons.</li> <li>Do you have any comments on the specific drafting proposed?</li> <li>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</li> </ul>	<p>No comments on the specific drafting proposed.</p> <p>Agree that the proposal meets the requirements of section 43N(3) of the Act.</p>
<p>Q4: In relation to the proposal to amend rules 43.2.2 and 47.1:</p> <ul style="list-style-type: none"> <li>Do you agree or disagree with the proposal? Please provide reasons.</li> <li>Do you have any comments on the specific drafting proposed?</li> <li>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</li> </ul>	<p>Agree with the proposals.</p> <p>No comments on the specific drafting proposed.</p> <p>Agree that the proposal meets the requirements of section 43N(3) of the Act.</p>
<p>Q5: In relation to the proposals to delete rule 65.2.6, amend rules 67.1.2, 67.3, 69.1, 69.2, 69.3, and 72.2; and insert new rule 67.3A:</p> <ul style="list-style-type: none"> <li>Do you agree or disagree with the proposals? Please provide reasons.</li> <li>Do you have any comments on the specific drafting proposed?</li> <li>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</li> </ul>	<p><b><i>Agree with the proposals with the exception of rules 69.2, 69.3, and 72.2.2.</i></b></p> <p><b><i>The amendments to rules 69.2, 69.3, and new rules 69.1A and 69.4 does not give flexibility to retailers of when the consumer exercises their contractual or statutory right to change their mind at a date close to the 23<sup>rd</sup> business day switch date. It is unreasonable and unrealistic to have a retailer's compliance with rule 69.2 to be contingent on the other retailer replying to the gas switching withdrawal notice promptly. Overall, these rules are very prescriptive and operate at a low transactional level.</i></b></p> <p><b><i>A practical approach would be to have a blanket rule over the withdrawal process timeframe. For example, rule 4.4 of Schedule E2 of the Electricity Governance Rules states:</i></b></p> <p><b><i>"On receipt of a rejection notification from the registry, in accordance with rule 4.3, a retailer may re-submit the switch withdrawal request for an ICP in accordance with rule 4.2. All switch withdrawal requests must be resolved within a maximum of 23 business days after the date of the initial switch withdrawal request"</i></b></p>

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	<p><i>(<a href="http://www.electricitycommission.govt.nz/pdfs/rulesandregs/rules/rulespdf/PartE-1Novo8.pdf">http://www.electricitycommission.govt.nz/pdfs/rulesandregs/rules/rulespdf/PartE-1Novo8.pdf</a>).</i></p> <p><i>This gives a clear timeframe on which the retailers must resolve the withdrawal. The GIC will not be required to carry out administrative tasks unnecessarily. The Registry will require changes to a lesser degree. Overall, this will allow for a more streamlined process that is free from unnecessary restrictions.</i></p> <p><i>The writing of Rule 72.2.2 is interpreted as such that only the new retailer can request an earlier switch date. There are circumstances where the responsible retailer may prefer an earlier switch date. The rule should allow for the responsible retailer to request an earlier switch date as well.</i></p> <p><i>In practical terms, firstly as systems are built to key fields, having the preferred date hidden in the comments field will most likely be overlooked. Secondly, with the current switch breach reporting process, if the switch date is earlier than the 7 business days after the date the gas switching notice is given to the registry, then the responsible retailer is in breach of rule 67.3. It is apparent that a new field for the preferred date will be required for the rule to work as intended. However, this will add another complexity in an already demanding process and will incur significant costs for system and process changes.</i></p> <p><i>Agree that the proposal meets the requirements of section 43N(3) of the Act.</i></p>
<p>Q6: In relation to the proposal to amend rules 69.4, 75, 78.1, 78.3.2 and 81.1; insert new rules 69.1A, 69.4, 74A, 75.4 and 78.2A; and delete rule 78.5:</p> <ul style="list-style-type: none"> <li>Do you agree or disagree with the proposals? Please provide reasons.</li> </ul>	<p><i>Agree with the proposals however disagree with the reason for change on rule 69.4.</i></p> <p><i>Refer to the comments in Q5 above on rule 69.2 and 69.3 for the comments on the reason for change on rule 69.4.</i></p>

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<ul style="list-style-type: none"> <li>Do you have any comments on the specific drafting proposed?</li> <li>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</li> </ul>	<p><i>Agree that the proposal meets the requirements of section 43N(3) of the Act.</i></p>
<p>Q7: In relation to the proposal to delete Part 4 of the Rules:</p> <ul style="list-style-type: none"> <li>Do you agree or disagree with the proposal? Please provide reasons.</li> <li>Do you have any comments on the specific drafting proposed?</li> <li>Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?</li> </ul>	<p>Agree with the proposals.  No comments on the specific drafting proposed.  Agree that the proposal meets the requirements of section 43N(3) of the Act.</p>
<p>Q8: In relation to the minor drafting changes proposed in section 3.8:</p> <ul style="list-style-type: none"> <li>Do you agree or disagree with the proposals? Please provide reasons.</li> <li>Do you have any comments on the specific drafting proposed?</li> <li>Do you agree or disagree that the proposals meet the requirements of section 43N(3) of the Act?</li> </ul>	<p>Agree with the proposals.  No comments on the specific drafting proposed.  Agree that the proposal meets the requirements of section 43N(3) of the Act.</p>