



**Submission to the
Gas Industry Co
on the
Mechanisms to Implement a Central Registry**

3-July-06

Introduction

Age Concern New Zealand is a not-for-profit, charitable organisation, dedicated to promoting the quality of life and well-being of older people, advocating positive healthy ageing for people of all ages.

Age Concern New Zealand is a federation of 28 local Age Concern Councils and seven other offices, all working with older people in their communities. The National Office operates as a strategic national body for local Age Concern Councils, which serves to support and promote the organisation's development and effectiveness and allows for issues identified at a local level to be addressed at a strategic policy level. This submission has been in consultation with Age Concern Councils.

Firstly, we would like to state that Age Concern endorses the United Nations Principles for Older Persons. These principles are centred on the rights of older people to:

- Independence
- Participation
- Care
- Self-fulfilment
- Dignity

Our submission responds to questions asked in the discussion paper. In some cases the questions asked were more relevant to industry-submitters than consumer group submitters.

At the end of our submission we include some additional comments.

QUESTION COMMENT

Q 1:	<i>Do you agree that mechanisms to implement a central registry must be mandatory? If not, please explain.</i>
	Age Concern New Zealand agrees that a central registry must be mandatory to ensure all the information is available from the one place.
Q 2:	<i>Do you agree Gas Industry Co has identified the most likely alternatives for mechanisms to implement a central registry? If not, please provide details of any other likely alternative mechanisms.</i>
	Age Concern New Zealand cannot comment on this question as it relates to an industry with few similarities to our charitable organisation. The older people we represent would benefit from a central registry.
Q 3:	<i>Do you agree with Gas Industry Co's analysis of a Pan-Industry Agreement as a mechanism to implement a central registry? If not, please explain.</i>
	No comment.
Q 4:	<i>Do you agree with Gas Industry Co's analysis of Pan-Industry Agreement with a Rules fallback as a mechanism to implement a central registry? If not, please explain.</i>
	No comment.
Q 5:	<i>Do you agree with Gas Industry Co's analysis of Rules as a mechanism to implement a central registry? If not, please explain.</i>
	Where an assessment of the benefits and costs is required, the impact on the consumers, especially consumers living off small incomes, e.g. single older people living off superannuation. It is noted that a high percentage of consumers' costs are attributable to simply being "on the network" (41%). Any increase of this overhead component threatens the viability of the industry, so far as low-income users are concerned. In some cases this might result in older people having to disconnect their gas at considerable cost and use expensive electricity instead (as overheads in that industry are lower).
Q 6:	<i>Do you agree with Gas Industry Co's preferred approach? If not, please explain what is your preferred approach and why.</i>
	Age Concern New Zealand supports this recommendation.
:	<i>Other Comments</i>

1.	Age Concern New Zealand recommends that the Gas Industry Co develops a strategy that makes natural gas more affordable for older people. By this it is noted that gas is only cost-effective when a certain amount is consumed. Older people tend to use low amounts of energy making it less likely to be cost-effective for them to use. This fact should be further investigated and promoted as a potential reason to switch from gas. Where network delivered natural gas is not a sensible option there may be another way to receive gas, alternatives are of great interest to consumers and any article or other information available could be promoted by Age Concern New Zealand to raise awareness for the benefit of older New Zealanders. Gas Switch should be available free on the www.consumer.org.nz .
2.	Older consumers need urgent help with re-filling their LPG gas heater bottles. Age Concern New Zealand responds to growing numbers of enquiries from isolated older people whose gas runs out on Friday with no means of getting their gas bottle refilled. Where the heating in this older person's house / unit is solely gas, this has serious and raises the risk of hypothermia. We recommend this issue is investigated by Gas Industry Co in partnership with Age Concern New Zealand.
3.	Healthy gas heating should be encouraged. The high moisture levels caused by not having a flue on gas heaters is known to have serious health effects including respiratory illness. Age Concern New Zealand is concerned about this and interested in working to reduce this risk for older people through health promotion.