

QUESTION	COMMENT
<p>1</p> <p>Do you agree with the proposed revisions to the Essential Services and Minimal Load Guidelines? If there are aspects that you disagree with, please explain what they are and why.</p>	<p>1.</p> <ul style="list-style-type: none"> a) Under section 3.1 of the Guidelines relating to Essential Service Providers a number of considerations are set out. Under point 1. Delete the last sentence of the first paragraph as reference to other countries experience is unnecessary. b) The Guidelines are clear that in considering ESP designations the application should be assessed in the context of a critical contingency event lasting only a matter of days. The inclusion of the category of “preservation of economic activity”, including the NZ Stock Exchange, Reserve bank and Trading banks seems unnecessary. It is difficult to imagine a scenario where such organisations would require the maintenance of gas supplies as we assume that the only gas use these entities have is for heating and water c) Kindergartens and Early Childhood Centres often cater for young children including babies. These facilities should be considered vulnerable/dependant. As such we believe they should be included under Table 2 (a) or (d). d) We suggest the GIC clarify with the IHC and similar providers if any of their residential care facilities should be classified under (d) as “dependent people”.
<p>2</p> <p>Are there other revisions that you would suggest for the Guidelines? Please outline what they are and why you think they are important.</p>	<p>See above.</p> <p>Note that under 4.1 Application process, the second paragraph is not longer applicable.</p> <p>The Guidelines are unchanged in that the retailer remains responsible for the determination of ESP status. Contact believes that the retailer is not best placed to determine a customer’s ESP designation. Given that the new guidelines should see a reduction in the number of customers eligible for the ESP designation Contact suggests that all applications be made through the GIC, not just the large customers. We believe this would be administratively more efficient as it will ensure timely determination of final ESP designation as there would be no need for appeals.</p>