



**Submission on Minor Amendments to the
Gas (Switching Arrangements) Rules 2008**

From

Contact Energy Limited

30th August 2010

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">• Do you agree or disagree with the proposals? Please provide reasons.• Do you have any comments on the specific drafting proposed?• Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?	<p>Contact Energy agrees with the proposed changes to rule 5 and Schedule A. The proposed drafting to effect these changes is appropriate. We also agree that the proposal meets the requirement of 43(N)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">• Do you agree or disagree with the proposals? Please provide reasons.• Do you have any comments on the specific drafting proposed?• Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act?	<p>Contact Energy agrees with the proposed changes to rules 24 and 25. The proposed drafting to effect these changes is appropriate. We also agree that the proposal meets the requirement of 43(N)3 of the Act.</p>

QUESTION	COMMENT
<p>Q3: In relation to the proposals to amend rules 28.1, 29, 30 and 31, and insert new rule 31.1.3:</p> <ul style="list-style-type: none"> • Do you agree or disagree with the proposals? Please provide reasons. • Do you have any comments on the specific drafting proposed? • Do you agree or disagree that the proposal meets the requirements of section 43(N)(3) of the Act? 	<p>Contact Energy agrees with the proposed changes. The proposed drafting to effect these changes is appropriate.</p> <p>We also agree that the proposal meets the requirement of 43(N)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"> • Do you agree or disagree with the proposal? Please provide reasons. • Do you have any comments on the specific drafting proposed? • Do you agree or disagree that the proposal meets the requirements of section 43(N)(3) of the Act? 	<p>Contact Energy agrees with the proposed changes to rules 43.2.2 and 47.1. The proposed drafting to effect these changes is appropriate. Our position is that the inclusion of the loss factor for gas serves no useful purpose and would suggest that this field is removed from the Registry. Distributors can include information on loss factors in their pricing notifications to retailers. Downstream Reconciliation rules 47 and 48 would apply.</p> <p>We also agree that the proposal meets the requirement of 43(N)3 of the Act.</p>

QUESTION	COMMENT
<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"> Do you agree or disagree with the proposals? Please provide reasons. Do you have any comments on the specific drafting proposed? Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act? 	<p>Contact Energy agrees with the proposed deletion of rule 65.2.6 and the proposed changes to 67.1.2, 67.3, 69.1, 69.2, 69.3 and 72.2. The proposed drafting to effect these changes is appropriate. We also agree with the inclusion of new rule 67.3A although a slight wording change may add a little clarity.</p> <p>67.3A If the new retailer includes a requested switch date for a requests-a move switch, the requested switch that date must not be earlier than 1 business day after the date the responsible retailer became responsible for supply according to the registry and must not be more than 23 business days after the date the gas switching notice is given to the registry.</p> <p>We also agree that the proposal meets the requirement of 43(N)3 of the Act.</p> <p>In regards to future dated move switches – we believe these are appropriate given the timing constraints mentioned above in 67.3A.</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"> Do you agree or disagree with the proposals? Please provide reasons. Do you have any comments on the specific drafting proposed? Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act? 	<p>Contact Energy agrees with the proposed changes to rules 69.4, 77, 78.1, 78.3.2 and 81.1 and the inclusion of new rules 69.1A, 69.4, 74A, 75.4 and 78.2A and the deletion of 78.5. The proposed drafting to effect these changes is appropriate.</p> <p>We also agree that the proposal meets the requirement of 43(N)3 of the Act.</p>

QUESTION	COMMENT
<p>Q7: In relation to the proposal to delete Part 4 of the Rules:</p> <ul style="list-style-type: none"> • Do you agree or disagree with the proposal? Please provide reasons. • Do you have any comments on the specific drafting proposed? • Do you agree or disagree that the proposal meets the requirements of section 43N(3) of the Act? 	<p>Contact Energy agrees with the proposed deletion of Part 4 of the Rules. The proposed drafting to effect this change is appropriate.</p> <p>We also agree that the proposal meets the requirement of 43(N)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"> • Do you agree or disagree with the proposals? Please provide reasons. • Do you have any comments on the specific drafting proposed? • Do you agree or disagree that the proposals meet the requirements of section 43N(3) of the Act? 	<p>Contact Energy agrees with the proposed minor drafting changes in Section 3.8. The proposed drafting to effect these changes is appropriate.</p> <p>We also agree that the proposal meets the requirement of 43(N)3 of the Act.</p>

