



GREYMOUTH GAS

Options for the Governance of Retail Contract Terms – Consultation Paper

Submissions close 3 November 2009

Greymouth Gas New Zealand Limited (Greymouth Gas) is pleased to make a submission on the Options for the Governance of Retail Contract Terms – Consultation Paper published by the Gas Industry Company in October 2009.

1. Regulations/Guidelines

Greymouth Gas considers that the governance of retail contract terms should be primarily via guidelines. We consider that regulation may be an unnecessary burden on retailers because mass-market consumers currently have some positive tools including better switching via the Gas Registry, streamlined disputes processes and a largely competitive retail market that encourages choice.

We have concerns that governance of regulated retail contracts would be expensive and might not increase productivity in New Zealand.

2. Retail/Commercial

Greymouth Gas notes that commercial contracts are often negotiated with customers to take into account business requirements. Accordingly, we consider it inappropriate to include any non-residential customer contracts as part of this work-stream.