

# Appendix A. Submissions template

Submission prepared by: Contact Energy, Rod Crone

QUESTION	COMMENT
<p>1 Do you have any comments on, or suggested amendments to the proposed direct connect, unmetered and oversized metered gas gate lists?</p>	<p>No comment</p>
<p>2 Do you have any comments on, or suggested amendments to the proposed determination of G1M criteria in accordance with rule 25C.1-25C.4?</p>	<p>No comment</p>
<p>3 Do you have any comments on, or suggested amendments to the changes to the proposed Notice of Determination? Do you have any comments on the determination of non-business days additional to weekends and national public holidays (in particular regional anniversary dates)?</p>	<p><u>Amendments to proposed Notice of Determination</u> Other than the comments below around non-business days we have no other comments.</p> <p><u>Determination of non-business days additional to weekends and national public holidays (in particular regional anniversary dates)</u></p> <ul style="list-style-type: none"> <li>• It is only an issue where (i) the accuracy of retailers submissions for initial allocations are affected (rule 37.2), (ii) there is reduced to time to process complete and accurate TOU data (increased estimation), and (ii) processing by the allocation agent is impacted.</li> <li>• Contact does not see (i) and (ii) being an issue in relation to submissions for interim and final allocations, which can easily be submitted earlier without impacting allocation quality.</li> <li>• For TOU ICPs Contact agrees there may be an issue where a regional anniversary date falls in the first few days of the month, although less of a problem for AG1.</li> <li>• For AG4 ICPs Contact’s meter readers tweak the read calendar to read meters earlier when regional anniversary dates occur towards month end, resulting in an increased percentage of forward estimate consumption and potentially reduced accuracy. However it is not considered sufficient to warrant the regional anniversary dates in the North Island being declared non-business days.</li> <li>• For AG6 ICPs the read calendar typically works on a 20 business day cycle so that the Xmas/New Year</li> </ul>

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	<p>national holidays and January anniversary days may result in less reads in December and January with a resulting increased percentage of forward estimate consumption and potentially reduced accuracy of initial submissions. However it is not considered this is sufficient to warrant the regional anniversary dates in the North Island being declared non-business days.</p> <p>Accordingly Contact submits that:</p> <ol style="list-style-type: none"> <li>1. Wellington Anniversary should always being a non-business day where it impacts processing by the Allocation Agent (so long as NZX is the allocation agent and its operation remains based in Wellington).</li> <li>2. Where a regional anniversary in the North Island occurs in the first 4 business days of the month consideration be given to declaring the regional anniversary day a non-business day in respect of rule 31 for all allocation participants and the allocation agent.</li> </ol>
<p>4 Do you have any comments on, or suggested amendments to, the proposed guideline notes with material changes - in particular (1) to procedures applying to the correction of annual UFG factor (rule 46A); and (2) types of events might constitute a major change for the purpose of rule 65.4-6?</p>	<p><u>Guideline note rule 5 – definition of gas gate</u></p> <p>Clause 4 (direct connect gas gate) is overly complex. It is suggested it be simplified by amending 4.2 to “A direct connect gas gate is a gas gate which supplies a single consumer and is allocated a single ICP in the registry” and deleting clause 4.3. Clauses 4.4 and 4.5 are ok as they provide additional clarity.</p> <p><u>Guideline note rule 30.3 – flagging of estimates</u></p> <p>Typo - should be “submission” in 3.1.</p> <p><u>Guideline note for rule 65 to 75 – commissioning and carrying out performance audits and event audits</u></p> <ul style="list-style-type: none"> <li>• 2.4. – the suggested use of “preferably” in the 2nd sentence should be omitted. The discussion pertains to the use of auditors who are not on the approved auditor register already. Therefore, the peer review of the “un-listed” auditor’s work should be assigned to a “listed” or approved auditor, nothing less.</li> <li>• 2.7 &amp; 4.12 – Rather than “recommend” and/or “recommended” it is suggested it be changed to “nominate” and/or “nominated”. As the participant is paying for the audit, Gas Industry Co should have a list of approved auditors which the participant selects from without Gas Industry Co having discretion. If a list does not exist, or the participant wishes to use an auditor not on the list, then there should be a process set out in the guideline for the CEO to “approve” rather than “appoint” the auditor as per clause 2.7.</li> <li>• 4.9 – The word “arrange” in rule 65.5 is a bit unfortunate. Contact notes that in normal circumstances the participant will select an auditor from a list of approved auditors, and will schedule and plan for the major change audit with the auditor to comply with the requirements set out in the rules.</li> </ul>

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	<ul style="list-style-type: none"> <li>4.10 (a) &amp; (b) – Suggest replace “establishing” with “implementing” as more appropriate.</li> </ul>
5 Do you have any comments on, or suggested amendments to, the proposed guideline notes with non-material changes?	No comment
6 Do you have any comments on the revocation of the listed seven exemptions?	No comment
7 Do you have any comments on the proposed variation to the global 1-month UFG methodology exemption?	<p>Contact agrees with the exemption being extended to 31/10/14, subject to confirmation as to when we must apply system changes regarding G1M gas gates. Our assumption is that:</p> <ul style="list-style-type: none"> <li>For the 3 existing G1M gas gates, the exemption extension by one month will mean that retailers must continue to submit TOU as AG3 and STOU up to 31/10/14, and as AG1/2 and XTOU from 1/11/14.</li> <li>For new G1M gas gates determined and published by 1/7/13, retailers will submit TOU as AG1/2 before and after 1/10/13.</li> </ul>
8 Do you have any comments on the new exemptions for SADSV calculation?	As for Q7