



**Submission on the Consultation Paper
concerning Determinations by the Industry
Body (Gas Industry Co) under the
Gas(Switching Arrangements) Rules 2008**

From

Contact Energy Limited

14 May 2008

Introduction

Contact welcomes the opportunity to provide feedback on the Gas Industry Co's ("GIC") consultation paper. Contact's answers to the questions asked by the paper follow.

For any questions related to this submission, please contact:

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Contact's Answers to Questions asked by the Consultation Paper

Question	Comment
Q1: Do submitters have any general comments on the proposed Determinations or the intended process to be adopted by Gas Industry Co in making these Determinations?	No general comments.
Q2: Do submitters agree with the proposed process for making changes to the proposed Determinations as set out in section 2 of Appendix B?	Section 2.2. 4 th Bullet Point – A determination change, once approved by the GIC, should be advised to all participants rather than just those parties that made submissions.
Q3: Do submitters have any comments on the proposed Determinations to be made under Rule 5 (definition of financial year and ICP identifier content), as set out in sections 3 and 4 of Appendix B?	No comments.

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<p><i>Q4: Do submitters have any comments on the proposed Determinations to be made under Rule 33 (report access and registry information access), as set out in sections 5 and 6 of Appendix B?</i></p>	<p>Section 6 – Bounds of Information to be Viewed.</p> <p>Para 6.3 – We are opposed to the proposed approach whereby a participant viewing information relating to a specific ICP would trigger a notification file to responsible parties (distributor, meter owner and retailers). We believe this functionality is inappropriate and is not required for two main reasons:</p> <ul style="list-style-type: none"> • Should a responsible distributor or meter owner wish to protect certain information it can achieve this through the use of “Disclosure on Application (DOA)”. Should the participant viewing the information wish to take the next step of obtaining the DOA information it can then request this by contacting the distributor or meter owner. Distributors and meter owners would therefore receive notification when interested parties make the appropriate application for the DOA data. • Should the participant viewing the information be acting on a request from a customer for a switch, it would be logical for them to first obtain the DOA information from distributor or meter owner. Or if the participant wished to take a risk of switching an ICP without first obtaining the DOA information, then the existing retailer will be notified via the GNT file as part of the normal switching process, and the new retailer will have to obtain the DOA information before billing the customer. <p>Para 6.2 – Rather than have proximate address functionality added to the Gas Registry it would be far more advantageous for retailers to be able to view details for all gas ICPs on a street to ensure that the correct property is switched.</p> <p>The Powerco website is a good example of how this would operate in practice - a search by street name returns all the gas ICPs on a particular street together with meter numbers and price category details. For certain ICPs the network price category details read “Please refer to Powerco pricing website” which is presumably similar to how the Disclosure on Application would work in practice.</p>

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<p><i>Q5: Do submitters have any comments on the proposed Determinations to be made under Rule 44 (ICP parameter codes), as set out in sections 7 to 14 of Appendix B?</i></p>	<p>Section 7 – Codes for Registry Participants</p> <p>The proviso that requires participant codes to be distinguishable for gas and electricity for the respective industry registries would involve a major change to multiple systems at Contact and be a prohibitive cost. We are strongly opposed to this requirement and suggest that it is rewritten to state that it is important for gas and electricity registry participants to include mapping functionality in their systems to ensure that they map to the code as is shown in the table of codes (7.3) (i.e. they can accept the code as per the table and map to the required code in their systems when receiving data; conversely when they are exporting data they are able to map from the code used in their system to match the code used in the table of codes.</p> <p>The Utility Type (G for Gas) would be included in the file naming convention (if a similar structure as that used by the electricity industry for information exchange protocols is adopted as seems to be the case) which would allow file recipients to determine whether mapping was needed.</p> <p>For example: CTCT_G_UNLG_File Type_200901_200812_1232.TXT</p>
<p><i>Q6: Do submitters have any comments on the proposed Determination to be made under Rule 62 (retention of information on resolution of discrepancies), as set out in section 15 of Appendix B?</i></p>	<p>15.1 Distributors, retailers and meter owners should retain records of discrepancies and actions taken to correct discrepancies (rather than retain records of reviews).</p> <p>15.2 Such information should be retained for 30 months to be in consistent with the reconciliation rules (rule 67) rather than retained indefinitely as the requirement states in the document.</p>

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<p><i>Q7: Do submitters have any comments on the proposed Determinations to be made under Rule 64 (codes relevant to switching), as set out in section 16 of Appendix B?</i></p>	<p>Section 16</p> <p>Register Content Codes</p> <p>TG – description should be modified to Temperature and Gauge Pressure corrected</p> <p>TGS – description should be modified to Temperature, Gauge Pressure and Supercompressibility corrected</p> <p>GAN Acceptance Codes</p> <p>MU – as there is no “unmetered load” (eg streetlights) for gas – it may be preferable to amend the description of this code to read “No Meter In Place”</p> <p>Meter Reading History Codes</p> <p>At present the Switching Rules include a flag to denote whether the gaining retailer at an ICP wishes to receive 12 months meter reading history. Contact considers this should only be allowed for TOU switches as contemplated in the Gas Reconciliation Code (Section A Clause 5.4 g (viii)) which clearly states that this requirement is applicable to TOU ICPs only. To extend this to mass market ICPs would add significant cost to Retailers. A rule change is required to add this clarification to the Switching Rules, so in the meantime this anomaly should be acknowledged and the expectation recorded that Retailers would not be expected to provide meter reading history information for mass market switches.</p>

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<p>Q8: Do submitters have any comments on the proposed Determinations to be made under Rule 84 (registry participant compliance reporting), as set out in section 17 of Appendix B?</p>	<p>Grouping of events within the Switch Compliance Reporting:</p> <p>Instead of having multiple breaches reported on multiple lines for one ICP, it is recommended that these are grouped at ICP level with the underlying data relating to the "Maximum Breach date". In the example below only one of the two breach types would display the event date data. The event that the date data relates to could always be first or something similar.</p> <table border="1"> <thead> <tr> <th>Switch Type</th> <th>Breach Type</th> <th>Default Participant</th> <th>Other Participant</th> <th>ICP Sent</th> <th>Date Due</th> <th>Completion Date</th> <th>Days Overdue</th> </tr> </thead> <tbody> <tr> <td>S</td> <td>GAN GAW</td> <td>CTCT</td> <td>GENG</td> <td>XXX</td> <td>1/05/2008 3/05/2008</td> <td>4/05/2008</td> <td>1</td> </tr> </tbody> </table> <p>Difference between Electricity & Gas Switching Rule response times:</p> <p>It has been identified that there are differences in the Rules between the Electricity and Gas response timeframes for certain files. It is recommended that a rule change is requested to the effect that the timeframe used for gas switching is aligned with the Electricity rules to ensure consistency is maintained where any internal / external processes have been established.</p> <table border="1"> <thead> <tr> <th>Electricity File</th> <th>Elec Response Time</th> <th>EGR</th> <th>Gas File</th> <th>Gas Response Time</th> <th>Gas Rule</th> <th>Recommendation</th> </tr> </thead> <tbody> <tr> <td>AC - Acknowledge Switch Read</td> <td>Not yet determined</td> <td>N/A</td> <td>GAC - Acknowledge Switch Read</td> <td>2 Business Days</td> <td>Gas Switching Arrangements - 79.1</td> <td>Extend to 5 business days</td> </tr> <tr> <td>AW - Acknowledge Withdrawal</td> <td>5 Business Days</td> <td>Part E - 4.3</td> <td>GAW - Acknowledge Withdrawal</td> <td>2 Business Days</td> <td>Gas Switching Arrangements - 76.1</td> <td>Extend to 5 business days</td> </tr> </tbody> </table>	Switch Type	Breach Type	Default Participant	Other Participant	ICP Sent	Date Due	Completion Date	Days Overdue	S	GAN GAW	CTCT	GENG	XXX	1/05/2008 3/05/2008	4/05/2008	1	Electricity File	Elec Response Time	EGR	Gas File	Gas Response Time	Gas Rule	Recommendation	AC - Acknowledge Switch Read	Not yet determined	N/A	GAC - Acknowledge Switch Read	2 Business Days	Gas Switching Arrangements - 79.1	Extend to 5 business days	AW - Acknowledge Withdrawal	5 Business Days	Part E - 4.3	GAW - Acknowledge Withdrawal	2 Business Days	Gas Switching Arrangements - 76.1	Extend to 5 business days
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<i>Other Comments</i>	<p>Section 5.7</p> <p>The Electricity Commission publish information on the number of ICPs by GXP by retailer – we would like to see similar data provided for gas.</p> <p>Section 11</p> <p>Connection status codes and valid combinations</p> <p>The use of the GAS code to denote gas is able to flow (i.e. the ICP is Active (Active-Contracted or Active-Vacant) is superfluous – the absence of a three letter “disconnection code” is sufficient to denote that the ICP is Active.</p> <p>Apart from the GAS code as mentioned above we believe there is merit in displaying the three letter disconnection code on the Registry as this would provide gaining retailers with useful information as to how and why the site was disconnected (e.g. vacant, safety, gas not required).</p> <p>Section 11.3</p> <p>The description of GCT and GCL are the same – the GCT description should have the words ...”and locked” deleted.</p>

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<p><i>Other Comments (continued)</i></p>	<p>Section 12 - Load Shedding Categories</p> <p>Given that the Gas Critical Contingency Regulations are still in draft and there is an established protocol in place (i.e. load shedding codes A-G), then this should be included in determinations until the new protocol is signed off.</p> <p>Attachment 1 Gas Gate Codes</p> <p>The list of gas gate codes provided is incomplete – for example:</p> <ul style="list-style-type: none"> • Papakura No 3 (PAP06603); Waitoki B (WTK33902) are both missing from the list provided. • Notional delivery points (e.g. Greater Auckland) are not included (the notional delivery points should also include the list of gates that make up the notional delivery point). • Revised gate names for Kapuni (KAP06912), TCC (TCC02001), Pirongia (PIR31101), Te Awamutu Cogen (TAC31001) have not been included. • Owner column – it would be more appropriate for the column heading to read Distributor Network and for this to include all distributor networks (e.g. Vector, Vector ex-NGC), Gasnet, Nova.