



# Contact Energy submission

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## Consultation on correcting submission errors at GTA03610 and WAG21501

Contact is supportive of the need to correct both these submission errors to ensure those retailers affected by these errors are appropriately compensated. As the causer of one of these submission errors we would like the opportunity to put the other affected retailers right.

However we do not believe the calculation of financial impacts for affected retailers is a complete representation of all costs these affected retailers have incurred across these affected periods.

Contact is one of a number of retailers who have incurred 37.2 submission accuracy error breaches relating to both these gas gates and affected periods. Contact has provided considerable compensation to the other affected retailers for our part in submission inaccuracies at these gas gates. Unfortunately submission errors such as these cast some doubt regarding the fairness of these previous 37.2 compensation adjustments that retailers such as Contact has previously paid.

It is our opinion that the calculation of financial impacts and therefore the amount of compensation owing to impacted retailers needs to also include a reassessment of the submission accuracy for the causers of these submission errors and where the causer has now exceeded the allowable thresholds then a revision of the 37.2 penalties needs to be included in the financial impact's calculation as part of this proposed settlement.