

Appendix A: Submissions Template

Submission prepared by: Contact Energy

QUESTION	COMMENT
Q1 Do you have any comments on the high-level process described in this section?	No.
Q2 Do you have any comment regarding the insolvency trigger?	No.
Q3 Should the obligation to report a retailer insolvency be placed on retailers only, to report their own insolvencies, or should gas producers, gas wholesalers, and the allocation agent also have reporting responsibilities (as proposed above)?	In our view the obligation should be on all parties.
Q4 Do you agree that these changes to the Switching Rules would be minor and would not adversely affect the interest of any person in a substantial way?	Yes.
Q5 Do you agree that the Switching Rules be amended to include the ability for Gas Industry Co to require information from an insolvent retailer?	Yes.

QUESTION	COMMENT
<p>Q6 Do you agree with the proposed content of the report(s)? Are there items that should be added or deleted, and why?</p>	<p>Contact largely agrees with most of the proposed content of the report however the emphasis should be on data that is not obtainable via another source such as the Gas Registry – namely that pertaining to the customer, meter reading, metering/billing set ups, and any access issues. There should also be clarification given as to the level of information required for active or inactive ICPs.</p> <p>Comments on particular fields follows:</p> <p>Event date: This term is used as the customer entry date in the customer information file for electricity (EIEP₄). Clarification should be provided as the Gas Registry also has an “Event date” field which signifies the date of the last event change (which may have been from active to inactive) rather than a customer-related event date.</p> <p>Finalled date: Does this pertain to the finalled date of the last billed customer at an ICP – in which case the relevant historic customer would need to be provided?</p> <p>Network Price/Tariff Code: This information is available on the Registry albeit some distributors use “DOA” as the price category which would not be recorded as such in the retailer’s billing system.</p> <p>Billing Type Code: Does this relate to whether the last bill was an Actual or an Estimate?</p> <p>Record Type: Not relevant for gas, this only has meaning for electricity meters which can have multiple channels.</p> <p>Suggestions for additional fields:</p> <p>Consumer Number: The reference number which links the customer to the premises.</p>

QUESTION	COMMENT
<p>Q7 Do you agree that these changes are minor and would not adversely affect the interest of any person in a substantial way?</p>	<p>We agree that the proposal requiring retailers to develop a report containing the prescribed customer information (where it is known), and to provide the report on demand, is appropriate. However the timeline needs to be set out in 101.1.</p> <p>Stranded ICPs – When retailer insolvency occurs how can the registry have ICPs which do not have a valid responsible retailer? If this scenario is not possible, then rule 104 is inappropriate or should be amended. It seems to Contact that this rule is intended to deal with ICPs with the status as outlined that do have a responsible retailer - the insolvent retailer.</p> <p>Clause 104.1 appears to assume that if one or more retailers request receipt of stranded ICPs then the request is for all stranded ICPs, however the request may be for only some of the stranded ICPs.</p> <p>Clause 104.2 suggests it is all or nothing in 104.1, whereas 104.2 may need to only allocate the residual ICPs not allocated under 104.1.</p>
<p>Q8 Further, it is likely that the cost of monitoring would be offset by the savings gained from finding any instances of gas consumption at the monitored ICPs, which can then be prevented through disconnection or used to identify potential new customers. In other words, without the proposed change, any UFG caused by vacant and inactive ICPs of the insolvent retailer will be allocated to remaining retailers at the affected gas gate in proportion to their customer load. With the proposed change, gas consumption at those ICPs will be identified and prevented, providing a benefit to all retailers at the gate at the expense of minor monitoring costs. Accordingly, Gas Industry Co concludes that this changes does not adversely affect retailers in a substantial way. Do you agree with the proposed amendments to the Switching Rules?</p>	<p>Yes.</p>

QUESTION	COMMENT
<p>Q9 Do you agree that the proposed change is minor and does not adversely affect the interests of any person in a substantial way? If not, please describe the substantial adverse effect.</p>	<p>We agree. Clause 105.2 needs to be amended. The status should not be changed just because successive readings indicate no consumption. We suggest the deletion of ""must change.....and."</p>
<p>Q10 Do you agree with the proposed trigger?</p>	<p>Yes.</p>
<p>Q11 Do you agree with the proposed approach of transferring orphan consumers on an ICP-by-ICP basis? If not, what alternative would you suggest that takes into account the need to transfer customers quickly and the limited resources at Gas Industry Co's disposal?</p>	<p>Yes.</p>
<p>Q12 Should a de minimus threshold (of e.g. 5% or 10%) apply to recipient retailers? If yes, do you agree with the proposed separate approaches to allocation group 1-3 and allocation group 4-6 customers?</p>	<p>We consider there should not be a de minimus threshold.</p>
<p>Q13 If not, do you prefer the option where all retailers are included, but those with less than 5% market share (by customers and volume)) can opt out?</p>	<p>We prefer this option.</p>
<p>Q14 Do you have any views on the proposed ICP allocation methodology?</p>	<p>We consider the splits should be 1-2 and 3-6. Allocation groups 1-2 are TOU consumers > 10TJ, whereas all other consumers are < 10TJ. The only difference between allocation groups 3 and 4 is the use of a static deemed profile to determine daily gas quantities to be submitted to the allocation agent, rather than the allocation agent determining the daily allocated quantities, otherwise the consumers in each allocation group will likely be of a similar size (> 250 GJ, < 10TJ) which requires monthly meter reads.</p>

QUESTION	COMMENT
Q15 Do you agree with this approach? Why or why not?	Yes.
Q16 Do you agree that this is a reasonable approach to the transfer of large consumers? If not, what alternative would you suggest?	Yes.
Q17 Do you have any comments on clauses 8-11 of the proposed Drafting Instructions?	No.
Q18 Do you have any comments on clause 12 in the proposed drafting instructions?	No.
Q19 Do you agree with the proposal in clause 13 of the proposed drafting instructions?	Yes.
Q20 Do you agree with this proposal? Why or why not?	Yes.
Q21 Do you agree that the change is minor and will not adversely affect the interest of any person in a substantial way?	Yes.