

Appendix D Recommended Format for Submissions

To assist Gas Industry Co in the orderly and efficient consideration of stakeholders’ responses, a suggested format for submissions has been prepared. This is drawn from the questions posed in the body of this Consultation Paper. Submitters are also free to include other material on the exemption application in their responses.

Submission from:.....Energy Direct NZ Limited, Deborah Anderson..... (company name and contact)

Question	Comment
<p><i>Q1: Do participants agree with the proposed approach (currently adopted by Jade and Gas Industry Co) to disregard NEW, DST and RET breaches on the maintenance breach report)? Should alternative arrangements be put in place for assessing compliance with these rules or is it sufficient for breaches to be alleged on an ad hoc basis as they arise?</i></p>	<p>EDNZ agrees with the exclusion of maintenance breach types NEW, DST & RET from reports and believes that it is sufficient for alleged breached to be raised on an ad hoc basis.</p>
<p><i>Q2: Do participants believe that further automating the production of breach reports and notices, and the inclusion of extra information, would be beneficial in the longer term?</i></p>	<p>It would be worth the investment to further automate the breach reports process and include additional information. This cost would be partly offset by the saving in GIC resource.</p>
<p><i>Q3: Do participants have any further suggestions for the enhancement of the compliance process or to reduce the compliance burden (assuming that changes to the Compliance Regulations will not be progressed in the near future)?</i></p>	

Question	Comment
<p>Q4: Do participants support the proposed amendment to the registry which would remove the option to re-submit a GNW if the first GNW request were rejected? Do participants agree that following receipt of a GAN or GTN the option to request a switch withdrawal should be re-opened and unlimited withdrawal requests should be allowed?</p>	<p>Yes, EDNZ's interpretation of rule 78.5 is consistent with that of the GIC, an amendment to the Registry is required to restrict repeat GNW's being submitted in response to a GNT (prior to a GAN).</p> <p>Yes, once a GAN has been submitted, switch withdrawal should be re-open. GTA timer has then been triggered.</p>
<p>Q5: If the registry is amended as per the proposal do participants consider that this gives effect to the purpose of rule 78.5? In conjunction with this change, would it be appropriate for Gas Industry Co to issue a blanket exemption or a guideline note to amend or clarify the purpose of the rule?</p>	<p>Yes, the proposed changes would give effect to the purpose of rule 78.5. A guideline note would assist to clarify the purpose of this rule.</p>
<p>Q6: In the longer term do participants feel that it is necessary for a rule change to clarify rule 78.5?</p>	<p>Yes, in the longer term, clarification of rule 78.5 would remove any chance of misinterpretation</p>
<p>Q7: Do participants agree that a change is necessary to the method used by the registry for calculating days overdue where non-business days are involved? Would participants prefer that breaches which are 'zero' business days overdue not be reported or that the count of days overdue for such breaches be the number of calendar days?</p>	<p>Yes, a change needs to be made to how non-business days are counted to reduce the number of incorrectly included alleged breaches.</p> <p>Breaches that are 'zero' business days overdue should not be reported.</p>
<p>Q8: Do participants agree that it is sufficient to rely on manual reporting of potential breaches of rule 72.2 or is there a preference for the registry to be amended to automatically flag where an actual switch date falls after a requested switch date?</p>	<p>If changes are made as per Q2 above, it would be cost effective to include monitoring and reporting of rule 72.2 also and have a switch flagged if an actual switch date has fallen after the requested switch date.</p>