

## Appendix A: Recommended Format for Submissions

To assist the 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 throughout the body of this consultation document. Respondents are also free to include other material in their responses.

Submission prepared by:

(company name and contact)

Question	Comment
Q1: Do you agree that the draft rules did not meet the intent of the rule drafters by effectively making confidential network price and other sensitive information available to all participants?	Yes
Q2: Do you agree that the draft rules should be amended to include a "disclosure on application" code to be used for some ICP parameters?	Yes
Q3: Do you agree that the amended draft rules included in this paper achieve the appropriate outcome for confidential network price and other sensitive information?	<p>Genesis Energy believes that the draft rule 44 does not adequately cover the intended use of the "price on application" code.</p> <p>For example the concept in the discussion paper <sup>1</sup> seems to suggest that this code would be used for no more than 1 – 2% of ICPs contained on the registry. This intent does not seem to have been clearly defined in the draft rules.</p> <p>Genesis Energy would suggest that the rule should include this</p>

---

<sup>1</sup> Gas Industry Company Decision Paper **Switching and Compliance** 19 January 2007 pg 19 para 5.6

Question	Comment
	implied intent and that the “price on disclosure” code be limited to 1 off, special pricing icps rather than to a group of icps.
Q4: Do you agree that the draft rules did not meet the needs of participants by not catering for inclusion of consumer installations directly connected to transmission systems?	Yes
Q5: Do you agree that the amended draft rules included in this paper are an appropriate means by which ICPs related to consumer installations directly connected to transmission systems should be added to and maintained in the registry?	<p>Genesis Energy agrees on the basis that the Direct Feed customer is responsible for 100% of the volume which is incurred at the gas gate.</p> <p>There does not seem to be any stipulation about the metering of direct feed sites. I would expect that if the site becomes a gas gate then the same level of metering that is required for a gas gate would be required for the site?</p> <p>It would be helpful to have some guidance on this issue.</p>
Q6: Do you agree that the registry operator should be covered by the compliance regulations in respect of the switching rules which impose process obligations on the registry operator?	Yes
Q7: Do you agree that there should be a liability cap for the registry operator?	<p>No. It is unclear as to how the \$20,000 per event or the \$100,000 per annum figures were derived therefore formal consultation on the amounts is limited, but does seem to be very low.</p> <p>Genesis Energy would see that any breach of confidentiality should have no event or per annum limit. Such breaches could include the lowering of security access to various datasets. For</p>

Question	Comment
	<p>example: A retailer or distributors entire customer base could be exposed for use by a competitor very easily<sup>2</sup></p> <p>There was also no mention in the analysis of the reduction in customer service or cost to businesses should the registry be unavailable for any extended period of time.</p> <p>In summary Genesis Energy believes more detail surrounding any proposed limits should be provided before a final view can be made.</p> <p>Genesis Energy would also urge the Gas Industry Company to exclude annual limits for all liability.</p>
Q8: Do you agree with the amounts specified?	See question 7
Q9: Do you agree that some aspects of the registry operator performance are best managed through a service provider contract?	Yes. Genesis Energy considers that it is imperative that the relationship is managed through a service provider contract.
Q10: Do submitters consider that the draft rules attached to this paper adequately reflect the intent of the Switching Proposal? If not, please provide drafting amendments in mark-up form.	Yes
Q11: Do submitters consider that the draft regulations attached to this paper adequately reflect the intent of the Compliance Proposal? If not, please provide drafting amendments in mark-	Yes

---

<sup>2</sup> The rule being proposed is inconsistent with the Electricity Commission Model Interposed Use of Systems Agreement pg 38 para 22.3 which has no limit for breach of Confidentiality

Question	Comment
up form.	