



16 December 2008

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Dear Malay

Switching Rules Transitional Exemptions

Genesis Power Limited, trading as Genesis Energy, welcomes the opportunity to provide a submission to the Electricity Commission on the consultation paper "Transitional Exemptions under the Gas (Switching Arrangements) Rules 2008" dated 4 December 2008. Genesis Energy welcomes the Gas Industry Company's consultative approach to handling these exemption applications and looks forward to this approach continuing.

Appendix A provides Genesis Energy's responses to the consultation questions.

If you would like to discuss any of these matters further, please contact Ross Parry on 04 495 3348.

Yours sincerely

A handwritten signature in black ink, appearing to read "John A Carnegie".

John A Carnegie
Regulatory Affairs Manager
Genesis Energy

Appendix A: Responses to Consultation Questions

QUESTION	COMMENT
<p>Q1: Do submitters have any comments on the transitional exemption applications regarding retailer switch notice response timeframes from gas retailers?</p>	<p>Genesis Energy agrees with the Gas Industry Company’s initial assessment and preliminary view, including the proposed duration of the exemption and handling of breaches.</p> <p>Genesis Energy looks forward to the Gas Industry Company addressing this matter through a rule change process in due course.</p>
<p>Q2: Do submitters have any comments on the transitional exemption application regarding distributor ICP parameter entry timeframes from Powerco?</p>	<p>Genesis Energy does not support granting of this exemption, nor would it support a permanent rule change to the same effect.</p> <p>Genesis Energy believes that two business days is ample time for submitting the information required under rule 51.3 (ICP identifier, creation date, responsible distributor and physical address). Distributors should have this minimal set of information from the time they receive a request for an ICP.</p> <p>The additional information under rule 56.2 is not required until two business days after the distributor has received confirmation of the metering equipment installed. Again, this should be ample time.</p> <p>Extending these timeframes by eight business days would degrade the service a new customer receives by delaying the start of their first accurate billing cycle. It would also require retailers to revisit their systems for handling new gas connections. Genesis Energy has gone to considerable effort and expense to</p>

QUESTION	COMMENT
	<p>build a system with escalation points based around the timeframes in the rules as they stand.</p> <p>Genesis Energy expects that over time the rules will help the industry to understand and improve upon the processes that occur over an ICP life cycle. This will ultimately improve efficiency to the benefit of consumers. Extending these ICP creation timeframes by such a significant amount would risk missing an early opportunity to improve process transparency.</p>