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Dear Ms Jefferies

## Determinations by the GIC under the Gas (Switching Arrangements) Rules

### Introduction

1. Mighty River Power welcomes the opportunity to comment on the Gas Industry Co's (GIC's) Consultation Paper "Determinations by the Industry Body (Gas Industry Co) under the Gas (Switching Arrangements) Rules 2008", April 2008.
2. No part of our submission is confidential and we are happy for it to be made publicly available.

### Responses to the Gas Industry Co's questions

Question	Comment
<i>Q1: Do submitters have any general comments on the proposed Determinations or the intended process to be adopted by Gas Industry Co in making these Determinations?</i>	No
<i>Q2: Do submitters agree with the proposed process for making changes to the proposed Determinations as set out in section 2 of Appendix B?</i>	Yes. Mighty River Power is comfortable with the proposed methodology

Question	Comment
<p><i>Q3: Do submitters have any comments on the proposed Determinations to be made under Rule 5 (definition of financial year and ICP identifier content), as set out in sections 3 and 4 of Appendix B?</i></p>	<p>Mighty River Power is happy with the definition of Financial Year.</p> <p>Mighty River Power supports the conditions proposed for ICP issuing. We would also like to emphasise it is especially important that once an ICP has been created for a premise it must not be changed (say to suit another issuer's billing system) over the lifetime of the premises.</p>
<p><i>Q4: Do submitters have any comments on the proposed Determinations to be made under Rule 33 (report access and registry information access), as set out in sections 5 and 6 of Appendix B?</i></p>	<p>Mighty River Power agrees generally with the reporting access as outlined and with the bounds of information access.</p> <p>Mighty River Power agrees with the search criteria as outlined, but would like to emphasise that one of the principle functions of the registry is to be able to search quickly and efficiently to identify a customers premises. Any restrictions to search functionality that limit this would render the registry of limited value, and will not be supported by Mighty River Power.</p>
<p><i>Q5: Do submitters have any comments on the proposed Determinations to be made under Rule 44 (ICP parameter codes), as set out in sections 7 to 14 of Appendix B?</i></p>	<p><b>Sect 7.2 Codes for registry participants</b></p> <p>Mighty River Power does not agree that Gas Participant Codes need to be different from Electricity Participant Codes.</p> <p>Mighty River Power and other parties currently use the same codes in both electricity and gas for switching and allocation. Forcing a change to these Codes would cause significant cost to these participants.</p> <p>The Codes used should be able to reflect the nature of the participant and it makes sense where possible to use the same code for the same participant for both electricity and gas.</p> <p>If Codes are expected to be different between electricity and gas for the same Participant, then it would also make sense for them to be required to be different for the same business fulfilling different functions (say distributor and meter owner).</p> <p>However, Mighty River Power does not believe this is necessary, and only makes this point to reinforce the inconsistency of the current proposal.</p> <p>Mighty River Power recommends the same Participant Codes be used for Electricity and Gas.</p>

Question	Comment
	<p><b>Sect 7.3 Proposed codes</b></p> <p>Mighty River Power notes that the proposed Codes are not consistent with the conditions outlined in 7.2. In the case of the Party Code for Mercury Energy (GMER) it does not reflect the Code we currently use for switching. We note that other retailers and distributors have proposed Codes that are the same as for electricity.</p> <p>Mighty River Power does not support the currently proposed Codes. Mighty River Power recommends that the Party Code used for Mercury Energy be our current code of MEEN.</p> <p><b>Sect 8 Gas gate codes</b></p> <p>Mighty River Power recommends that the Gas Industry Co be responsible for controlling the Gas Gate Codes referred to in switching and reconciliation. Mighty River Power recognises most of these Codes will be decided by the transmission operator. However, there are already situations where a Gate Code is not recognised by the transmission operator, but are necessary for switching and reconciliation.</p> <p><b>Sect 11.3 Connection Status Codes</b></p> <p>ICP Status Ready with a Code "PRE" is in our opinion potentially confusing given that the description is "pre activation, service has not yet been installed" which is the same description as for the New Status Code "NEW"</p> <p>Mighty River Power recommends changing the ICP Status Ready description to more accurately reflect the status of the ICP which is that the details of the ICP have been loaded within the Registry by the network and GMS operators but the service has not been installed. Possible wording could be "Pre-activation ICP data loaded, service has not been installed"</p> <p>Within the Active Contracted Status there are two Codes GCT and GCL. Both Codes reflect credit disconnections but the descriptions of both of these Codes are the same. Mighty River Power seeks clarification of the differences between these Codes.</p> <p>We note that the descriptions within Valid Connection Status include numerous references to a service being "capped". This is a technical term which is one of two methods of physical disconnection of a gas service as described in the Gas Association of New Zealand's Disconnection and Reconnection Protocol. Mighty River Power recommends the term "capped" in section 11.3 be replaced with either "capped or plugged" or "physically disconnected".</p>

Question	Comment
	<p><b>Sect 13.2 Allocation Group Codes</b></p> <p>Mighty River Power appreciates that the proposed Allocation Group Codes 1-6 reflect the current Allocation Group Codes as set out in the Reconciliation Code and as proposed by the Gas Industry Co for the new Allocation Rules. However, we question the need to have Allocation Group Codes 1 and 2 given there is no difference in the processing, or the use of the metering information obtained from the customers in these two Groups.</p> <p>Mighty River Power recommends that both within the Gas Registry and the new Allocation Rules that the Group Codes should be numbered from 1 to 5 inclusive with the proposed Groups 1 and 2 being combined into Group 1.</p>
<p><i>Q6: Do submitters have any comments on the proposed Determination to be made under Rule 62 (retention of information on resolution of discrepancies), as set out in section 15 of Appendix B?</i></p>	<p>Mighty River Power sees little value in retaining discrepancy information indefinitely. Mighty River Power recommends that discrepancy information be required to be retained for the maximum duration of reconciliation wash-up period, after which it will have little value as no more reconciliations are possible.</p>
<p><i>Q7: Do submitters have any comments on the proposed Determinations to be made under Rule 64 (codes relevant to switching), as set out in section 16 of Appendix B?</i></p>	<p><b>16.3 – Acceptance Codes</b></p> <p>Mighty River Power recommends the Code for declining “D” be changed to “R” to make it consistent with the GAW code</p> <p><b>Attachment 2 – page 21 Breach Types</b></p> <p>Typo - Rules state GTN Delivery, GTN in 3<sup>rd</sup> line should be GNT</p>
<p><i>Q8: Do submitters have any comments on the proposed Determinations to be made under Rule 84 (registry participant compliance reporting), as set out in section 17 of Appendix B?</i></p>	<p>Mighty River Power supports regular, automated compliance reporting for the purposes of improving participant operations, but not for the purposes of automated breach and “speed Camera” fines as was prevalent at one time in the electricity industry.</p>

### Concluding remarks

3. If you have any queries regarding this submission please do not hesitate to contact me (on 09 308 8259 or [robert.allen@mightyriver.co.nz](mailto:robert.allen@mightyriver.co.nz)) or John Candy (on 09 580 3783 or [john.candy@mightyriver.co.nz](mailto:john.candy@mightyriver.co.nz)).

Yours sincerely,

Robert Allen

**Regulatory Manager**