



5 March 2010

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Dear Sir

**Switching: Operations and Compliance discussion paper**

Thank you for the opportunity to make a submission for the discussion paper "Switching: Operations and Compliance discussion paper. No part of our submission is confidential and Mighty River Power is happy for our comments to be published.

While we support the majority of proposed changes within the discussion paper Mighty River Power does not see the need for interim measures to be implemented. We appreciate that it is not the intention of this paper to submit rule changes or make major policy changes so soon after go live, however we believe that there has been sufficient time to understand what changes are required. Mighty River Power would like to see only the long term solutions to be incorporated to eliminate any double handling or re-work.

Mighty River Power would like rules to be reviewed where necessary to avoid doubt, misinterpretation from participants or unrealistic rules. An example of this is exemption application SW08-01-T. In this instance we believe a rule change would be more effective than an exemption process.

Accompanying this letter are our comments to Appendix D, questions.

Should you require any further clarification or information please contact me on 09 5803777 or [mark.wilderspin@mercury.co.nz](mailto:mark.wilderspin@mercury.co.nz)

Yours faithfully,

**Mark Wilderspin**

Compliance and Process Improvement Manager