



22 January 2013

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Dear Jacki

## **Proposed Amendment to the Gas Governance (Compliance) Regulations 2008**

### **Introduction**

1. Mighty River Power welcomes the opportunity to provide this submission on the Proposed Amendments to the Gas Governance (Compliance) Regulations 2008 issued on 22 December 2012. No part of the submission is confidential and Mighty River Power is happy for it to be publicly released.

### **Comments**

2. Mighty River Power agrees with and supports the Gas Industry Company's proposal to amend the threshold regimes within Downstream Reconciliation Rules and the Gas Switching Rules as described in the above amendment.
3. In particular we believe that the Gas Switching Rules would benefit from the proposed amendment to the threshold regime. We have submitted to the Gas Industry Company on several occasions that preparing responses to alleged breaches of these rules is time consuming and arguably of no benefit, as there is no market impact. Retailers' systems and business rules need to account for both gas and electricity regulations, and these do not often align, making compliance more difficult and therefore more costly to achieve.
4. With regards to the above our primary concern is the best interests of our customers who are best served by, where it is appropriate, minimising compliance costs

## **Concluding remarks**

5. If you would like to discuss any of our above comments directly with Mighty River Power, then please do not hesitate to me on 06 348 7926 or [jim.raybould@mightyriver.co.nz](mailto:jim.raybould@mightyriver.co.nz) .

Yours sincerely

A handwritten signature in black ink that reads "Jim Raybould". The signature is written in a cursive, slightly slanted style.

**Jim Raybould**

Gas Manager