



12 December 2014

Gas Industry Company Limited
PO Box 10-646
Wellington 6143

Mighty River Power Limited
Millennium Centre
602 Great South Road
Ellerslie 1051
Private Bag 92008
Auckland 1142

Phone: +64 9 580 3500
Fax: +64 9 580 3501
www.mightyriverpower.co.nz

To Whom it may concern

Response to the Gas Industry Company's Compliance Threshold

Mighty River Power appreciates the opportunity to respond to the Gas Industry Company's Consultation: *Compliance Thresholds*. No part of the submission is confidential and Mighty River Power is happy for it to be publicly released.

Mighty River Power supports all of the threshold changes recommended in the statement of proposal. However we believe that the backdating in rule 72.2 needs further consideration. The current proposal is creating a situation where the switching rules are tailored to cover TOU sites along with mass market sites, when these should be separate. As mentioned in the consultation this is less likely to cause a problem for mass market sites. If backdating is to occur in relation to mass market sites MRP propose that it should instead be a 7 working day window, as opposed to the same calendar month, which has the potential to cause more breaches and confusion with mass market sites, as in some instances it would be permissible to back-date a request close to one month (e.g. request a site on 30 April with a proposed switch date of 1 April), while in other instances it would not be permissible to back-date a request even one day (e.g. request a site on 1 April with a proposed switch date of 31 March).

Should you have any queries in relation to any of the above or other related issues please do not hesitate to me on 09 580 3875 or phillip.brandt@mercury.co.nz

Yours sincerely

Phillip Brandt
Compliance and Process Improvement Coordinator
Mercury Energy

1 APPENDIX A SUBMISSION TEMPLATE

Consultation on Compliance Thresholds

Submission prepared by:

QUESTION	COMMENT
Q1: Do you agree that the current guideline in relation to rule 37 of the Reconciliation Rules should be used as the threshold for reporting of breaches under the amended Regulations?	Yes, MRP agrees with the proposed change
Q2: Do you agree that the proposed threshold for rules 67.3, 70.2 and 72.2 of the Switching Rules should be applied for reporting breaches under the amended Regulations?	MRP agrees with the proposed changes. We recommend that further consideration be given to rule 72.2, this is mentioned in more detail in the cover letter.
Q3: Do you agree that the proposed threshold for rules 69.1 and 69.2 of the Switching Rules should be applied for reporting breaches under the amended Regulations?	Yes, MRP agrees with the proposed change