

Submission by: Contact Energy Limited

QUESTION	COMMENT
Q1: Do you agree with the proposed purpose of the Oversight Scheme?	Yes.
Q2: Do you agree with the Scope of the Scheme?	Contacts agrees: <ul style="list-style-type: none">- that the scheme should not cover LPG contracts;- that the scheme should only apply to gas supply arrangements under standard published contracts. Contact recommends that gas supply agreements contracted on the new gas markets should be exempted from the requirements of Scheme.
Q3: Do you support the proposed RCEs?	Yes.
Q4: Do you support the proposed arrangement of outcome based Benchmarks and Interpretations sitting under the RCEs? Or would you prefer Principles and Minimum Terms? Why?	Yes, Contact supports the proposed arrangement of outcome based Benchmarks and Interpretations sitting under the RCEs.
Q5: Do you agree that there should be scope for Gas Industry Co and industry to amend the Benchmarks under the Scheme and provided the Benchmarks support the RCEs?	Yes.
Q5: Do you have any comments on the proposed amendments to the Benchmarks and Interpretations?	No.

GIC: Statement of Proposal Retail Gas Contracts Oversight Scheme Review

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<p>Q7: Do you have any comment on the proposed amendments to the scheme operation?</p>	<p>Contact supports the GIC's proposal to increase flexibility in the current assessment and monitoring regimes subject to the following comments:</p> <ul style="list-style-type: none">- Contact supports the GIC seeking confirmation every year from retailers as to whether they have amended their standard published gas contracts. Contact recommends the certification should be sought from management and not the Board. Management certification will ensure that those with responsibility for the issue consider it and give the confirmation. Requiring the Board to give this confirmation would be overly burdensome and in our view unnecessary.- Contact has submitted previously that the frequency of assessments should be driven by change and not by arbitrary dates. Whilst we appreciate the move to a 3 yearly full assessment/scheme review this could equally be 5 years, another arbitrary period. We encourage the GIC to adopt assessments only on an 'as required' or 'ad hoc' basis as described on page 34 of the consultation document and remove the requirement for a hard wired review.