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Malay Shah
Gas Industry Company Limited
PO Box 10 646
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11 February 2009

Dear Malay,

**Submission on Determinations by the Industry Body (Gas Industry Co)
under the Switching Arrangements) Rules 2008 V1.2**

1. Vector Limited ("Vector") welcomes the opportunity to submit on the Determinations by the Industry Body (Gas Industry Co) under the Switching Arrangements) Rules 2008 V1.2 ("Switching Determinations").
2. Vector seeks clarification on section 6, "Bounds on information access via online services." More specifically, Vector asks that the GIC make the provisions found in 6.3 clear.
3. In previous versions on the Switching Determinations, 6.3 stated:

"Any participant may view the full details for any list of ICPs provided that the participant uses the exact ICP identifier(s) or exact meter identifier(s)."
4. Vector considers that this communicates quite clearly that any participant has clearance to view a list of ICPs, given certain information is entered into a search query.
5. However, in Switching Determination v1-2, currently being consulted on, 6.3 states:

"Any participant may view the full detail for any individual ICP provided that the participant uses correct ICP identifier, the street name or the correct meter identifier as the search criteria."

6. Vector interprets the revised version of 6.3 as no longer allowing for lists of ICPs to be viewed upon entering a certain set of specifications. Whereas informal conversations with the GIC have pointed out there has been no change and that participants will still be able to view lists of ICPs.
7. Vector, despite being opposed to this provision which effectively allows retailers to trawl for potential customers, asks that the GIC clarify the wording in 6.3 by making it clear that participants are able to view lists of ICPs to which they are not participant owners.
8. Vector proposes that 6.3 be reworded as follows (with changes in bold):

“Any participant may view the full detail for any **lists of** ICPs provided that the participant uses correct ICP identifier, the street name or the correct meter identifier as the search criteria.”
9. Additionally, Vector asks that the GIC actively track and monitor the information viewed to ensure the registry is not being misused as a marketing tool. If such instances are to arise then the GIC should proactively discontinue provisions such as 6.3 that encourage such behaviour.
10. Thank you for considering this submission. If you have any queries, or require further information, please feel free to contact Melanie Strokes at Melanie.strokes@vector.co.nz or 04 803 9038.

Kind regards



Nathan Strong

Manager Regulatory Affairs