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## TRUSTPOWER SUBMISSION: STATEMENT OF PROPOSAL ON GAS REGISTRY AMENDMENTS

Trustpower Limited (Trustpower) welcomes the opportunity to provide a submission to the Gas Industry Council (GIC) on its *Statement of Proposal on Gas Registry Amendments* consultation paper (the Consultation Paper).

Our answers to the specific questions posed in the Consultation Paper are attached in Appendix A.

We would like to raise the following questions over and above the material submitted in Appendix A:

- a) Will a level of data cleansing be expected before Implementation? What does this look like?
- b) We suspect the cost estimates in the CBA are a little light, and are based solely on a system development cost model. We suspect the true cost to implement is likely to be considerably higher. Has the GIC accounted for design, build, testing, training, documentation, etc?
- c) If the proposal were to go ahead how set are the milestones? Has consideration been given to the time it will take retailer vendors to roll this out to multiple parties? Does this fit in with their road map, and can they deliver on time to all participants?

For any questions relating to the material in this submission, please contact Helen Taylor, Trustpower's Post Part 10 Project Manager, on 07 572 9888.

Regards,

**JAMES TIPPING**  
**REGULATORY STRATEGY MANAGER**

## Appendix A: Responses to consultation questions

Question	Response
1. Do you agree with the definitions proposed for the three core metering fields? If not, please explain why and supply alternate definitions.	1.1 Yes.
2. Do you agree with the addition of these three fields to the registry?	2.1 Yes.
3. Do you agree with the definitions proposed for TOU meter and advanced meter? If not, please explain why and supply an alternate definition.	3.1 No – there is still ambiguity. TOU verses Interval metered? There is a lot of confusion in the industry and think consistency across electricity and gas should be logical. Electricity definitions cause issues still, so believe a common, clear and precise approach is best.
4. Do you agree with the proposal to add the TOU flag, but not to add the other metering fields, or change the number of location codes in use?	4.1 Yes.
5. Do you agree that the proposed distributor fields do not add sufficient value to warrant addition to the Registry?	5.1 Yes.
6. Given the extent of the changes required to retailers' systems, do you agree that a file versioning mechanism should be implemented? If so, do you support participant level versioning or individual report level versioning?	6.1 If any file versioning is required then Trustpower would support participant level as adequate.
7. Do you agree with the introduction of audit provisions to the Rules? Do you have any comments on the audit principles or proposed	7.1 We believe the wording of Section 4 should include Performance and <b>Quality</b> Audits.

rule drafting?	
<p>8. Do you agree with the introduction of a validation check on the content of the Gas Transfer Notice? Do you agree that this validation should not be applied for ICPs with TOU meters?</p>	<p>8.1 Yes – however data cleansing will need to obtain a certain threshold of accuracy before we would be comfortable with a validation check. If the Meter Owner data is incorrect, what is the process and timeframes for a switch?</p> <p>8.2 Rule 67.3 – we believe rules 67.3 70.2 &amp; &amp; 72.2 should be amended. Currently this allows for a transfer switch from a gaining retailer to set a requested date. This is not usually in alignment with the electricity switch. As a losing retailer, we have customers providing their final reads for both electricity and gas. Their accounts are finalized by our contact centre (which is what the customer wants), yet the rules dictate we have to reverse the final and either use a different date or send a withdrawal to have the date amended.</p> <p>8.3 Given we are looking at aligning timeframes and improving the experience of the customer, we believe this should be addressed. As a gaining retailer, it would be preferable to gain both ICPs from the same date, using actual reads and having the customer happy from the start.</p>
<p>9. Do you agree with the reduction of the allowed switch timeframe from 23 business days to 10 business days?</p>	<p>9.1 Yes.</p> <p>9.2 Has any consideration been given to linking dual fuel sites? (Gas to Electricity Alignment – flag indicating both ICPs are in switch mode).</p>
<p>10. Do you agree with the amended wording of rule 61.1.1, to accommodate switches where contracts have been entered into significantly in advance of the supply commencement date?</p>	<p>10.1 Yes.</p>
<p>11. Do you agree that a meter owner should have the ability to populate an ICP’s metering parameters, and the responsible meter owner field, before retailer uplift of an ICP?</p>	<p>11.1 Yes.</p>
<p>12. Do you agree that ICP parameters should be able to be edited by their respective owners during a</p>	<p>12.1 Yes.</p>

switch? Are there any ICP parameters that should remain restricted?	
13. Do you agree that a connection status for temporary disconnections, as provided for in Rule 59, should be added to the Registry?	13.1 Yes – for safety reasons.
14. Do you support the development and implementation of a gas data hub?	14.1 Yes.
15. Do you have any other comments on enhancements to the Registry interfaces or other information exchange mechanisms?	15.1 The Hub should be the method to transport file – emails should remain as a communication method
16. Do you support the proposed minor changes?	16.1 Yes.