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Submission on the Determinations under the Gas (Switching Arrangements) Rules 2008

Vector welcomes the opportunity to submit on the Determinations under the Gas (Switching Arrangements) Rules 2008. Thank you for accepting our late submission.

Vector's response to the questions set out in the consultation paper is attached as Appendix A. Thank you for considering this submission. If you have any queries, or require further information, please feel free to contact Ewan Gebbie (ewan.gebbie@vector.co.nz ph 04 462 8657) or Tony Hooks (tony.hooks@vector.co.nz ph 09 978 7894).

Kind regards

A handwritten signature in black ink that reads "Ewan Gebbie".

Ewan Gebbie

Group Manager Regulatory Performance

Appendix A Recommended Format for Submissions

To assist the Gas Industry Co in the orderly and efficient consideration of stakeholders' responses on the proposed Determinations, a suggested format for submissions has been prepared. This is drawn from the questions posed in the body of this Consultation Paper. Submitters are also free to include other material on the proposed Determinations in their responses.

Submission prepared by:.....Ewan Gebbie, Vector Ltd.

Question	Comment
<p><i>Q1: Do submitters have any general comments on the proposed Determinations or the intended process to be adopted by Gas Industry Co in making these Determinations?</i></p>	<p>Vector agrees with the process to be adopted by Gas Industry Company in making these Determinations.</p>
<p><i>Q2: Do submitters agree with the proposed process for making changes to the proposed Determinations as set out in section 2 of Appendix B?</i></p>	<p>Vector would prefer that <u>all</u> industry participants are advised of proposed changes. GIC may not be fully aware of the implications to every participant. There is therefore the risk of inadvertently missing out an interested party, if not all participants are advised.</p>
<p><i>Q3: Do submitters have any comments on the proposed Determinations to be made under Rule 5 (definition of financial year and ICP identifier content), as set out in sections 3 and 4 of Appendix B?</i></p>	<p>Vector agrees that it is appropriate to define the financial year start date as 1 July. Vector also agrees with the definitions of ICP identifier as per Rule 4.</p>
<p><i>Q4: Do submitters have any comments on the proposed Determinations to be made under Rule 33 (report access and registry information access), as set out in sections 5 and 6 of Appendix B?</i></p>	<p>Vector agrees with the intent of these rules – to prevent any participant from using the Registry for 'data mining'. The access restrictions described in Rules 5 and 6 appear to be appropriate, without unnecessarily restricting access to ICP data in order to facilitate retailer switching. However, this area will need to be continuously monitored by GIC and participants to ensure that the restrictions strike the right balance between information availability, and utilising the registry as a marketing tool.</p>

Question	Comment
<p><i>Q5: Do submitters have any comments on the proposed Determinations to be made under Rule 44 (ICP parameter codes), as set out in sections 7 to 14 of Appendix B?</i></p>	<p>Our comments are:</p> <p>Rule 7 – Codes for registry participants</p> <p>Vector agrees that with the proviso (rule 7.2) that ‘codes must be distinguishable from the equivalent code used for the electricity registry, where the gas registry participant is also an electricity register participant’. We note however, that a number of the codes in table 7.3 are the same as the code used in the electricity registry. We also note that some retailers strongly hold the view that the codes <u>should be</u> the same in both registries. Because it has been difficult to get consensus on this issue, we request that GIC poll all participants on whether the codes should be identical across electricity and gas. If yes, then a number of gas participant codes will be pre-determined by the electricity set-up already in place; if no, then we recommend that the retailer codes already used by Vector and Powerco should be retained, as this will minimise the cost of transferring data from distributor databases to the new Registry. We have attached a table of the retailer codes currently used in distributor databases. Also note that Greymouth Gas is missing from the GIC list.</p> <p>Rule 8 – Gas gate codes</p> <p>The list provided is incomplete, and needs to be amended. In particular:</p> <ul style="list-style-type: none"> • Where there is a group of gas gates, to be treated as a single gas gate for the purpose of the Rules (part d of gas gate definition) then attachment 1 should show both the code for the group (eg GTA03610) and the gates which make up this group. This applies to Auckland, Hamilton, Tauranga and Mt Maunganui groups, and possibly others. • There should be a code for the Waitoki network interconnection – gate WTK33902. • The owner column is incomplete. <p>Note that there may be new gates commissioned, or gates decommissioned at any time. The list under Rule 8 should be continuously reconciled with Vector Transmission to ensure that there are no anomalies with the gas gate codes held in Oatis.</p> <p>Rules 9-14 – Vector has no comments on these lists.</p>

Question	Comment
<p><i>Q6: Do submitters have any comments on the proposed Determination to be made under Rule 62 (retention of information on resolution of discrepancies), as set out in section 15 of Appendix B?</i></p>	<p>Vector submits that there should be a definite time limit to the obligation to hold these records. We suggest 7 years.</p>
<p><i>Q7: Do submitters have any comments on the proposed Determinations to be made under Rule 64 (codes relevant to switching), as set out in section 16 of Appendix B?</i></p>	<p>Vector has no comment on these codes.</p>
<p><i>Q8: Do submitters have any comments on the proposed Determinations to be made under Rule 84 (registry participant compliance reporting), as set out in section 17 of Appendix B?</i></p>	<p>Vector has no comment on the formats and content of the monthly compliance reports described in section 17, and in Attachment 2 to Appendix B.</p>