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11 October 2006

Gael Webster
Gas Industry Company Ltd.
1 Willis Street
Wellington

Dear Gael

SUBMISSION ON THE PROPOSAL FOR SWITCHING ARRANGEMENTS FOR THE NEW ZEALAND GAS INDUSTRY

We welcome the opportunity to provide submissions on the proposed Switching Arrangements for the New Zealand Gas Industry.

Vector generally supports the introduction of industry arrangements that meet the Government's objectives: in this case the establishment of a central registry to facilitate customer switching. Vector also supports measures that improve the efficiency and accuracy with which the industry handles information from a pragmatic perspective.

We support the GIC's continued efforts to ensure that the structures placed around a central registry do not inhibit the establishment of a registry that is fit for purpose and is affordable.

Vector is happy to engage with the GIC on any part of this submission. Please contact me in the first instance.

Kind regards

Ewan Gebbie
Industry Policy Manager

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Ewan Gebbie
Industry Policy Manager

VECTOR'S SUBMISSION ON THE STATEMENT OF PROPOSAL DISCUSSION DOCUMENT (PART 1): SWITCHING ARRANGEMENTS FOR THE NEW ZEALAND GAS INDUSTRY -

Vector's submission is in two parts, with two appendices:

Part 1
We respond briefly to the 10 questions raised by Gas Industry Company in Appendix 3: Recommended format for submissions.

Part 2
We provide further details to support the issues raised in part 1, where appropriate.

Appendix 1
We provide a marked copy of the Proposed Rules for the new Switching Arrangements, to reflect changes which Vector considers are necessary or desirable.

Appendix 2
Please see the attached Excel Spreadsheet, which quantifies the benefits of the Proposal and where they accrue. This is relevant to our discussion in part 2.3 (Cost allocation), below.

Part 1: Responses to Specific Questions

Q1: Do submitters agree with this Regulatory Objective? If not, what do you think the regulatory objective should be?

A1: No. As it stands the objective refers to "……timely and accurate switching between retailers and *distributors*." Our understanding is that the objective is to facilitate switching between retailers – switching between distributors is not part of the brief, and is not covered elsewhere in the document. We believe that the objective could therefore be more clearly stated as follows:

"The objective of the proposed draft rules for new switching arrangements is to achieve timely and efficient switching of customers between retailers, by facilitating the timely exchange of accurate and up-to-date information between customers, retailers, distributors, and meter owners."

Q2: Do submitters agree with the analysis of the Proposal? If not, please state your reasons.

A2: Yes, in broad terms; although there are some particular issues which impact on the analysis. These are covered in detail in Part 2.1 of this submission. However, these issues are not so significant as to alter the fundamental results of the analysis.

Q3. Do submitters agree this Proposal complies with section 43N of the Gas Act? If not, please state your reasons?

A3: Yes.

Q4: Do submitters have any other information that they consider is relevant to the assessment of the Proposal?

A4: Additional information is provided in Part 2 of this submission.

Q5: Do submitters agree that the Proposal meets the Regulatory Objective? If not, please state your reasons.

A5: Yes, the Proposal meets the *restated* Regulatory Objective (refer to Vector's response to Question 1).

Q6: Do submitters agree with the benefits relative to the costs of the Proposal as set out in Appendix 2? If not, please state your reasons.

A6: Vector has reservations about the methodology used to quantify both benefits and costs. In particular, the costs of software development and the assessment of ongoing software costs are very subjective. These costs cannot be quantified until a full specification is developed, and proposals are received from interested parties. The costs and benefits will need to be reviewed at this stage. We discuss our concerns in more detail in Part 2.2 of this submission.

We also recommend that GIC approach the Electricity Commission to review what synergies may be obtained by developing a single "Energy Registry" for New Zealand.

Q7: Do submitters believe the Rules adequately reflect and govern the Proposal? If not, please provide all drafting amendments in mark-up.

A7: We generally agree that the Rules reflect the intent of the Proposal. However, amendments are needed in the fundamental area of recording status changes in the Registry. Currently the rules prevent the distributor and GMS owner from recording status changes through the lifetime of the ICP - this being the sole prerogative of the retailer. This is unacceptable to Vector.

Since retailers, distributors and GMS owners dispatch field staff or undertake field audits (site visits) to complete work which may affect the connection status of the ICP; each party should be able to (indeed, obliged to) update the ICP status on the Registry on conclusion of the work. Similarly, field audits from each party may find that the status of the ICP is different to the latest event recorded on the Registry, obliging an update to the ICP status on the Registry so that it reflects the site's actual status.

Without Registry updates from each party being authorised the Registry is compromised in being the "database of record" as implied by Rule 38.2. The rules (as they currently stand) prevent this happening.

Vector has marked up changes to the Rules to address this issue, with explanatory notes attached. We have also made minor changes to other parts of the Rules.

Q8: Do submitters agree with the funding options for the Proposal? If not, please state your reasons.

A8: Vector does not agree with the proposed funding options. We believe that the funding for the development of the Registry should be met primarily by those parties who will derive benefits from the proposed new switching arrangements. These are identified in the Proposal as end-consumers and retailers. Please see further arguments in Part 2.3, below.

Q9: Do submitters agree with the allocation of costs for the Proposal? If not, please state your reasons.

A9: Vector does not agree with the proposed allocation of costs. As above, we believe that the costs should be borne primarily by those parties who will derive benefits from the proposed new switching arrangements. See Part 2.3 below for more detailed discussion.

Q10: Any other comments?

A10: Vector supports the establishment of a Central Registry as a practical means of facilitating the timely and efficient switching of customers between retailers, and is committed to ensuring the records retained in the proposed Registry are accurate and up-to-date. This will ensure its relevance as the "database of record".

Part 2.

2.1: Analysis of Specific sections

Comments in detail on particular sections of the discussion documents are found below.

Section 4.13 Table 2 –Churn rates understated

1. This table demonstrates that the proportion of electricity customers switching retailers is twice the rate of gas customers, but *understates* the annual churn rates significantly. Based on the numbers provided the annual churn rate for gas customers is 5%, and the annual churn rate for electricity customers is 9.2%.

2. The electricity registry witnessed a churn rate of 27% in the April to June quarter of 2001. The recent historic churn for both gas and electricity should not be relied on to provide a definitive number for future rates as industry events can lead to significant activity well above the normal pattern with the development of a gas registry may acting as a spur to competitive gas market.

Section 4.27, paragraph 3

3. While this section makes valid points relating to the lack of mandatory rules for updating ICP data in distributor databases, it infers that this is the main cause of two common switching issues 1) customers possibly having a gas supply without a retail contract, and 2) more than one retailer billing the same customer. Vector believes that distributors are unfairly compromised by this inference, as these outcomes are not primarily caused by problems with the reliability of data in distributor databases.

4. Any gas supply which is left connected after the current customer has "finalled" their account and moved out, automatically (by definition) becomes a gas supply without a retail contract. The double-billing for some sites usually results from the losing or gaining retailer and/or the distributor not complying with the existing gas switching protocols.

5. Distributors, therefore, would be unfairly penalized by having to bear the lion's share of associated costs. Vector believes that it is more appropriate that any related costs should be borne primarily by retailers.

6. It is worth noting that under the Gas Act, the retailer is still responsible for the ICP until a retailer switch occurs or they complete and Transitional Disconnect (stopping the ability of gas to flow) or Withdrawal, as defined in the Reconnection/Disconnection Protocol.

Section 5.10

7. We are pleased to see that this section's recommendations (extensions to the Registry functionality to comprehensively link ICP status and physical connection status; and to discourage inappropriate access to commercially sensitive data) are endorsed by the GIC and incorporated into the Proposal.

Section 5.19

8. We agree with the incremental approach described in section 5.19, of establishing a Gas Registry as a first step to achieving a central registry with a fully integrated allocation mechanism at some future point in time.

Section 5.31

9. We agree with the conclusion in this section that the new switching arrangements should be implemented by rules, rather than regulations.

Section 6.3

10. We strongly concur with the statement in section 6.3 that the Registry will be a database of record for allocation and reconciliation purposes. A number of the changes to the rules suggested by Vector in Part 2.5 below reinforce this view.

Section 6.7: Systems capacity is potentially underspecified

11. This section infers that the Registry system will be capable of handling 30,000 switches per annum. However, the system must also be able to handle significant numbers of "one-off" ICP status events at short notice that may far exceed this number. Examples are

    - the transfer of significant numbers of ICPs from one distributor pricing category to another;
    - the transfer of significant network assets from one distributor to another; and
    - the sale of one retailer's customer "book" to another retailer.

12. Any of these events could cause tens of thousands of ICP transactions in one 24-hour period. The registry system must have the capacity to deal with these events when they occur, in addition to the processing the regular volume of retailer switches.

Section 6.21 (Means of maintaining the values of ICP parameters) needs expansion

13. In addition to the use of a web browser to maintain ICP Parameter values, it is essential that the registry is able to receive notifications of changes to ICP values by .csv files. The appropriate management processes (transfer protocols and validation procedures) to deal with these files must also be in place. It would be impractical for distributors such as Vector to maintain ICP details manually for each ICP via a web browser.

Sections 7.14 – 7.17 (ICP creation and ICP parameter maintenance) need extending

14. These sections do not deal adequately with the changes of "ownership" of ICP information. Over the lifetime of an ICP there are likely to be:

    - Changes of data ownership between retailers;
    - Changes of data ownership from one distributor to another (eg acquisition of Enerco by Orion, subsequent sale to United Networks, and eventual purchase by Vector)
    - Changes of data ownership from one GMS owner to another (either the GMS may be sold by one owner and purchased by another, or it may be replaced with a GMS which is supplied by a different owner).

15. While the second and third events do not happen as regularly as retailer switches, they must be provided for in the software design.

16. The anchor for these changes must be either the Gas Act or the GPS

Proposed draft rules (section 8.2) need expansion

17. An additional bullet point is required as follows (2nd bullet point has been added):

    - govern the process to establish a new ICP and decommission existing ICPs;
    - *govern the process for recording connection, disconnection, and reconnection events over the lifetime of the ICP;*
    - govern the process for switching customers between retailers;

18. These events must be recorded if the Registry is to become the "database of record" for allocation and reconciliation purposes.

Section 8.6: Software licensing arrangements must lie with GIC

19. It is not clear which party would have ownership to the intellectual property developed during the design and implementation of the Registry. It is ESSENTIAL that this remains with the Gas Industry Company, and not with the software developer or provider.

Treatment of Gas costumers fed from Transmission System not clear under Proposed Rules

20. A number of larger gas customers feed directly from the high pressure transmission system and do not require the involvement of a distributor or an independent GMS service provider. The proposed rules for maintaining this ICP information in the registry is not clear.

Responsibility of Service Providers at ICP point not clear

21. There may be more than one provider of gas metering services (GMS) at an ICP. The regulator, the physical meter and potentially corrector can all have different owners. More clarity is required in regards to which service provider is responsible for what information in the registry.

22. We note that the Retailer remain responsible for an ICP from the time it is created until it is placed in a 'transitional state' (e.g. de-energised by having supply broken on immediate downstream side of service valve with both upstream and downstream open end plugged). This means gas can not flow to the site, and the GMS is not being employed to determine if the installation is using gas. This follows the same principles as electricity.

Term used to refer to Gas Measurement System (GMS) instead of 'Meter'

23. In gas, unlike electricity, accurate measurement is dependent on more than just the meter. The Gas Act and other industry documentation refer to GMS. Specifically we believe that the term 'meter' should be replaced with 'GMS'. Please see further comments in our marked-up version of the Rules (attached).

Definitions between documents must be consistent

24. Generally, technical definitions including Regulations, Standards, protocols, NSA, Gas Metering Services Agreements (GMSA) need to be same as those already employed in other documents, where possible. In Vector's view Schedule 2 of this discussion document does not clearly define the different state of connections. These need to be limited and reflective of other rules/protocols used in the industry. Nor do its proposals meet all the requisite Safety responsibilities (both HSE and common law)

25. In these respects the Gas Reconnect/Disconnect Protocol developed by GANZ would be a good example to follow, especially as the GIC have commenced work on the Reconnect/Disconnect standard.

2.2 Comments on cost/benefit analysis

Benefits

Insufficient information provided to verify benefit claims

26. In general we agree with the process used to establish the benefits that are accounted for in Appendix 2. However, there is insufficient information provided to verify that the claimed benefits are achievable. In particular:

27. Static benefits: it is unclear what assumptions have been made in assessing the static benefits as being in the range $272,000 to $282,000 per annum. This needs further clarification.

28. Audit savings: it is possible that these have been overstated. Audit work in the current switching environment is of two kinds:

    a. Checking that the records in one database are the same as in other databases;

    b. A physical site audit, to verify that the computer-based records are accurate.

29. As any database may become out-of-date over time, the second kind of audit work will still be required (albeit less frequently). It is therefore possible that the Proposal exaggerates the net benefits of audit savings, as the costs associated with site audits are usually significantly greater than for office-based checking of records.

30. Dynamic efficiency gains: Vector is not able to comment on the reliability of these calculations. The benefits calculated from dynamic efficiency gains are dependent on a significant reduction in retail margin per customer, partly attributable to the Proposal, and partly attributable to efficiency gains. These calculations seem rather subjective, based on a theoretically enhanced competitive environment.

Costs

Costs (section 11.72) should be quantified more clearly

31. Vector appreciates that the costs of software development, and the assessment of ongoing software costs, cannot be quantified until a full specification is developed, and proposals received from interested parties. However we are concerned that a) the costs may be significantly higher than the range indicated in section 11.72, and b) may be borne by a small customer base.

32. We are concerned that the parties supplying indicative costs may not appreciate the complexity of the project. Most estimates received to date seem somewhat conservative when compared to similar platform development costs (such as the electricity registry). The Gas Registry appears to embody most features of the Electricity Commission National Registry, and in some respects is more comprehensive. Development costs should therefore be similar (at least) to the EC Registry, if the Gas Registry was developed as a stand-alone system.

33. In addition, the costs (net of any efficiency gains) will ultimately need to be spread across a relatively small customer base (240,000 gas customers compared to 1.8 million electricity consumers).

34. Vector recommends:

    - That a detailed and comprehensive systems specification be developed as soon as possible, so that software development costs and systems running costs can be obtained from a number of suppliers, based on the detailed requirements document;

- That the cost / benefit analysis be reviewed once these quotes have been obtained;
- That the GIC continue to work closely with the Electricity Commission in the meantime, to explore the synergies that may be obtained by running a single "Energy Registry" for New Zealand, holding details of both electricity and gas ICPs, and providing the mechanism for switching retailers for both sectors of the industry.

2.3 Funding Options and Cost Allocation

Allocation of costs should match benefits accrued

35. Vector does not agree with the proposed allocation of costs. We believe that the costs should be borne primarily by those parties who will derive benefits from the proposed new switching arrangements. These are identified in the Proposal as end-consumers and retailers.

36. As in Section 2.2 above, benefits have been identified as follows:

Static benefits (sections 11.19 – 11.21)

37. The static benefits (reduced costs of performing retailer switches) primarily benefit retailers. As Section 11.19 quotes "The easily identifiable static benefits are the reduced costs of performing a switch from one retailer to another". Distributors and meter owner costs are largely neutral: regardless of the switching process the primary obligation on distributors and meter owners is to record the details of completed switches so that distribution charges and meter leases are charged to the correct party. At present these details are supplied by retailers, in future they will be available from the registry – the source changes, but not the action required of distributors and meter owners. The static benefits (reduced costs of performing retailer switches) therefore primarily benefit retailers. We estimate that "static" benefits accrue 80% to retailers, 20% to distributors, and 0% to meter owners.

Audit savings (sections 11.22 – 11.24)

38. Audit costs are currently shared between distributors and retailers. Where records conflict then it is possible that either party may be incorrect. Generally costs of physical site audits are borne by the party whose records are proved to be incorrect; in other cases costs may be shared equally. Therefore any reduction in costs of audits will benefit distributors and retailers equally. We do not see any benefits directly accruing to meter owners

Dynamic efficiency benefits (sections 11.25 – 11.30)

39. Section 11.26 describes how dynamic efficiency gains are derived from lowered barriers to retail competition, resulting in more innovative products, with higher value and lower costs to customers, and lower costs to producers. Dynamic efficiency benefits depend on lowered barriers to retail competition. There is no significant direct benefit to either distributors or meter owners from lowered barriers to retail competition. We have therefore apportioned dynamic efficiency benefits 90% to retailers, 10% to distributors, and 0% to meter owners.

Appropriate Cost allocation: Vector Supports ICP-based Funding

40. Vector therefore recommends that the costs of funding, and the allocation of ongoing costs, be apportioned according to where the benefits lie. Please see the Excel spreadsheet mentioned earlier that outlines benefits accrual. This would result in 80% of costs (initial funding and ongoing costs) being borne by retailers and 20% by distributors. There is no allocation of costs to meter owners, as they

do not share in any significant benefits from the Proposal, and in fact have new obligations to update Registry records.

41. In line with this, Vector Supports ICP-based funding, subject to the immediate comment below

Cost allocation methodology must follow proper quantification of costs

42. While a methodology for apportioning costs has been proposed, Vector understands that these costs (setup and registry maintenance) still remain uncertain. Before committing to any funding methodology, Vector would seek to determine its maximum liability to these potential costs year on year. A figure that caps the maximum exposure would seem prudent.

43. Vector is happy to engage in further discussion on this point.

Registry must be 'Database of record'

44. As noted in Vector's response to Question 7 above, benefits accrue to distributors primarily if the proposed Registry is accepted by all retailers, distributors, and meter owners as the 'database of record'. These benefits are lost to distributors completely if they consider that a parallel database is required so that distributors can record events affecting the connection status of an ICP. For the Registry to achieve the status of a "database of record" some fundamental rule changes are required relating to ICP status changes.

45. In practical terms this means:

- If Registry design and implementation is sufficiently robust to warrant it to be treated as the "database of record" then up to 20% of benefits may accrue to distributors; therefore Vector would support that level of cost allocation to distributors.

- If the Registry design and implementation fails the "database of record" test, and distributors need to develop and maintain parallel recording systems, then there are no (or minimal) benefits to distributors. In this case, distributors should not bear any part of the costs of development or operation.

2.3 Recommended changes to Proposed Gas (Switching Arrangements) Rules

Specific Changes to Sections of the Proposed Rules

46. Vector has made specific changes to the proposed Rules and included them in our response as requested – see Appendix 1. Further supporting comments are found below.

Definition of 'Gas Distribution System':

47. This definition does not cover some large consumer installations that are supplied directly off a gas gate. These installations have an ICP number and can switch from one retailer to another, but under the rules no distributor is responsible for them.

ICP type code' definition required

48. This is referred to in various rules. The meaning of this is unclear – we therefore request that it be added to the Definitions.

Point 11.5

73. What incentive does the Co-regulatory body have to keep fees to the registry operator to a minimum?

Sections 20 and 22

74. Fees are based on the number of ICPs on the first business day of any month. Since the current CIG levy is already based in ICP numbers on the last day of the month and since Rule 81 proposes a retailer report quoting ICP details as on the last day of the month, it would make more sense to base fees on ICP numbers on the last day of any month.

Point 61.2.1

75. The final word 'and' should be replaced with the word 'or', since a consumer's agreement as described in Point 61.2.2 is all the retailer may have at the date of switch initiation.

Point 62.1

76. A deadline of 2 business days is unreasonable and unnecessary for contracts which have a requested switch date.

Point 66.2.1 and point 68.2.1

77. These two sections seem to contradict each other. The current retailer should not be allowed to make the expected switch date any date other than the requested switch date, without good reason, as is implied by point 68.2.1 (which is somewhat different from point 66.2.1).

Registry access

78. Provision is made in rule 32 to restrict access to certain data by setting a data security flag to 'ON'. However, regardless of this, rule 32.8.1 provides for the Registry to provide the restricted data to any registry participant, providing (rule 32.8.2) that they subsequently inform the owner of data that they have passed it on. This seems ludicrous. We therefore recommend that these clauses be rewritten.

Initial population of the Registry the responsibility of Distributors

79. The definitive record of Responsible Retailer, and ICP Connection Status, is currently held by gas distributors. An obligation should therefore be placed on distributors to populate these fields on the Registry at the initial loading time. Vector has recommended changes to rule 40.1 to give effect to this obligation. A new Part A2 has been added to Schedule 1 to document the additional information to be supplied by distributors as part of the initial population of the Registry. The data items are:

    - Responsible retailer code
    - Retailer date applicable
    - Connection status code
    - Connection status date applicable

80. Rules 40.1.2 and 40.1.3 have been amended so that retailers and meter owners respectively receive reports listing all ICPs for which they are deemed to be responsible. There are consequential changes and additions to rule 41 to provide a

mechanism for retailers and meter owners to validate this data, and arrange for corrections where necessary before go-live date.

General Comments

Recording ICP connection, disconnection, reconnection, and decommission events

81. In line with the intention that the proposed Registry should be the "Database of Record", all parties need to have a common view on the pricing arrangements, the retailer responsible, and the connection status for each ICP so that the effective recovery of network charges and meter leasing fees from the appropriate Responsible Retailer is possible.

82. Vector is concerned that the proposed rules and particularly the operation of Schedule 2 and Schedule 3 do not facilitate the Registry becoming the database of record for connection status.

83. We therefore recommend the replacement of Schedules 2 and 3 with a new Schedule 2, which is more straightforward. The key points of this change, which is supported by additional clauses written into rule 54, and elsewhere, are:

- The number of ICP statuses over the lifetime of an ICP is reduced to two – NEW and READY. Refer to Vector's changes to rules 48.2 and 49.3. These statuses are updated by the Registry, and derived from Connection Status;
- The number of Connection statuses are reduced to five – refer to new Schedule 2, part A – thereby simplifying this part of the Rules;
- Restrictions on who can update an ICP from one status to another are removed;
- There is an obligation on distributors, retailers, and GMS owners to record any event where field work results in a change to the physical connection status of an ICP. These details must be updated on the Registry within 3 days of the completion of any field work which they are responsible for managing. Refer to rule 54.2;
- There is an obligation on distributors, retailers, and GMS owners to record any site visits which establish that the current physical connection status is different to the Registry connection status. These details must be updated on the Registry within 3 days of the completion of any site audit which they are responsible for managing. Refer to rule 54.3;
- Where a disconnection event is recorded, there is an obligation on the party managing the field work to record a HOW code and a WHY code – refer to rules 54.2 and 54.3, and Schedule 2, parts B and C;
- Further details are required to be recorded to indicate <u>when</u> the field work (or site audit) was carried out, and <u>by whom</u> – refer to Schedule 2, parts D and E.

84. Vector believes that these changes are fundamental to making the Registry the Database of Record. If the Registry is not accepted as such then any perceived benefits to Distributors and GMS owners will be lost. There would then be the need to maintain parallel databases within distributors' and GMS owners' records. This would require the cross-checking of these databases with the Registry and with each other, with retailers and their records, and with GMS owners. Unnecessary costs would be incurred against all industry participants.

Funding the registry – development and ongoing fees

85. Further to the funding/allocation section above, Vector recommends the changes below to deal with any uncertainty surrounding development and ongoing fees.

Development fees

86. We recommend changes to rule 20.2 to require the Co-regulatory body to determine Registry Development Costs before proceeding with the development, and to calculate each participant's share at this stage. This change has two consequences:

- Invoicing of participants, and payment, will occur earlier, thus providing funding for the project.
- The Co-regulatory body, Project management, and the Registry provider will thereby be incentivised to complete the implementation on time and within budget.

Ongoing fees

87. A similar change is recommended to rule 22.2 to require the Co-regulatory body to determine budgeted costs for each financial year, and to base each monthly levy on that budget. This change has two consequences:

- It provides certainty to industry participants on the total costs their sector (retail or distribution) will be levied for the coming year. (The share levied on each individual participant may vary if the number of ICPs they are responsible for changes).
- The Co-regulatory body and the Registry provider are thereby incentivised to keep costs within budget.

Definition of loss factor changed

88. Vector has an obligation to set loss factors for each ICP in its distribution area. The current definition refers to 'expected gas losses on the distribution system'. This implies that significant quantities of gas escape from distribution networks on a regular basis. Our research shows that Unaccounted for Gas (UFG) is caused by a number of issues, including meter inaccuracy, accounting treatments, allocation of sales across allocation periods, etc; and that physical gas losses are a relatively insignificant part of UFG. To reflect this view we have changed the definition of loss factor, and added new definitions for Unaccounted for Gas, Gas Injected, and Gas Delivered.

Concluding remarks

89. To obviate the need for time-consuming and potentially expensive changes in future, it is imperative that all rules and switching arrangements:

- must clear and unambiguous from the beginning;
- vagaries are removed and avoided where possible;
- Compliance rules must have 'teeth' and be readily enforceable. This last point echoes our comments in our accompanying submission on the Part 2 – Compliance and Enforcement Discussion Paper.

GAS (SWITCHING ARRANGEMENTS) RULES

1. Purpose

The purpose of these rules is to establish a set of gas switching and registry arrangements that will enable consumers to choose, and alternate, between competing retailers.

2. Outline

These rules provide for –

2.1 The establishment of the registry; and

2.2 The management of information held by the registry; and

2.3 The appointment of a registry operator; and

2.4 A process for switching consumers between retailers.

3. Commencement

3.1 Rules 44 to 81 come into force on [**insert go-live date**].

3.2 The rest of these rules come into force 28 days after the date these rules are notified in the *Gazette*.

Part 1

General provisions

4. Interpretation

4.1 In these rules, unless the context otherwise requires, a word or expression defined in the Act has the same meaning as it has in the Act.

4.2 In these rules, unless the context otherwise requires,-

Act means the Gas Act 1992;

actual reading means a reading that has been physically viewed and recorded from the meter register or corrector register;

allocation agent means, for each gas gate, the person who allocates the daily and monthly gas purchase volumes to the retailers taking supply of gas at that gas gate;

business day means any day of the week except –

(a) Saturday and Sunday; and

Comment [A1]: do customer reads qualify as "actual" readings; do electronically transmitted readings qualify as "actual reads"?

(b) Any day that Good Friday, Easter Monday, ANZAC Day, Queen's Birthday, Labour Day, Christmas Day, Boxing Day, New Year's Day, the day after New Year's Day, and Waitangi Day are observed for statutory holiday purposes; and

(c) Any other day which the Co-regulatory body has determined not to be a business day as published by the Co-regulatory body;

connection status code means the code that identifies the physical status of the connection between the distribution system and the consumer installation, as set out in Schedule 2;

consumer means a person who purchases gas for consumption;

consumer installation means one or more gas installations that have a single point of connection to a gas distribution system and for which there is a single consumer;

co-regulatory body means the industry body approved by the Governor General, by Order of Council made on the recommendation of the Minister of Energy, to provide for co-regulation of the gas industry by the Government and that industry body;

corrector means a device that dynamically replaces any one or more of the fixed factors otherwise required to convert gas volume measured at actual conditions to gas volume measured at standard conditions;

day means a calendar day;

distributor means a person who owns or controls a gas distribution system;

estimated reading means a reading that has been quantified by an estimation process;

existing retailer means the retailer who, prior to a switch being effected, is the retailer supplying gas at the relevant ICP;

financial year means the twelve-month period beginning on the date determined by the Co-regulatory body;

Comment [A2]: this should be defined here!

gas distribution system means a system of fittings used to convey gas from a gas gate outlet supplying gas for distribution to -

(a) The point at which gas is supplied to a consumer; or

(b) A downstream gas gate;

(c) A single consumer installation.

gas gate means the point of connection between –

(a) A transmission system and a gas distribution system; or

(b) Two gas distribution systems;

gas injected means the metered measurement of gas entering a gas distribution network from the gas transmission pipeline;

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gas delivered means the volume of gas delivered from a gas distribution network to consumers (including to embedded networks), as accounted for to the allocation agent by gas retailers;

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ICP or **Installation Control Point** means the point at which a consumer installation is deemed to have gas supplied from a gas distribution system, and which represents the consumer installation on the registry;

ICP identifier means the unique 15-character identifier assigned to each ICP, having the format, yyyyyyyyyyxxccc, where:

yyyyyyyyyy	is the gas connection number specified by the distributor and unique to that connection in the distributor's records;
xx	is an alphabetic combination, determined by the Co-regulatory body, for use by the distributor when creating the ICP identifier;
ccc	is an alphanumeric checksum generated by an algorithm specified by the Co-regulatory body;

ICP parameter means –

(a) One of the defined set of components of an ICP as set out in Schedule 1; and

(b) The ICP status codes and connection status codes as set out in Schedule 3;

ICP parameter value means a numerical value or an alphanumeric code or some free text, as included in the registry specification for each ICP parameter;

ICP status code means the code that identifies the accessibility of the ICP for switching and how the ICP is treated within the allocation and reconciliation processes, as set out in Schedule 2;

ICP type code means ……

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loss factor[1] means the factor by which a measured or estimated volume of gas for an ICP or gas gate must be multiplied in order to offset **unaccounted for gas**, as measured in a previous 12-month period;

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meter means an instrument designed to measure the volume of gas passed through it;

[1] The original definition of loss factor implies that there are expected to be "gas losses" on the distribution system; Vector's amendment makes it clear that the loss factor is calculated to offset UFG as previously measured. It is assumed that UFG will be reasonably constant between accounting periods. A definition has been added for Unaccounted for Gas.

meter owner means the person who owns or controls a meter used to measure the volume of gas (as used in the allocation process) for a consumer installation;

metering equipment means any one or a combination of a meter, corrector, datalogger and the telemetry used to measure or convey volume information related to an ICP;

month means a calendar month;

move switch means a situation where a consumer moves to a consumer installation and elects to have gas supplied at that consumer installation by a retailer different from the retailer that supplied the previous consumer at that consumer installation;

new retailer means the retailer who, as a result of a switch, will be the supplier of gas to the consumer installation concerned and the retailer for the ICP on and from the switch date;

notice means any notice, acknowledgement, application, request, approval, response or other communication to be given in accordance with these rules**;**

parent gas gate means, for an ICP or gas gate, the gas gate immediately upstream of the ICP or gas gate, where upstream means in the direction towards a transmission system;

publish means –

(a) In respect of information to be published by the Co-regulatory body or the registry operator, to make such information available to the intended recipient through the registry system; and

(b) In respect of all other information, means to make available to the intended recipient in such manner as may be determined by the Co-regulatory body from time to time;

register reading means the number displayed by, or estimate for, a meter register or corrector register at a particular date and time, and that represents the volume of gas that has flowed through the register over a certain period;

registry means the database facility (including all relevant hardware and software) that meets the requirements set out in rule 36;

registry operator means the service provider appointed by the Co-regulatory body to establish, maintain, and operate the registry;

registry operator service provider agreement means the agreement between the Co-regulatory body and a person, where that person is appointed as the registry operator;

registry participant means a retailer, distributor, meter owner or allocation agent;

registry specification means the specification for the registry set out in the registry operator service provider agreement;

responsible distributor means, for a particular ICP, the distributor whose distributor code is shown on the registry as the responsible distributor and who is thereby responsible for maintaining the values of the ICP parameters listed in Part A of Schedule 1 and of the ICP parameters listed in Parts A and B of Schedule 2 (as applicable);

responsible retailer means, for a particular ICP, the retailer whose retailer code is shown on the registry as the responsible retailer and who is thereby responsible for maintaining the values of the ICP parameters listed in Part B of Schedule 1 and of the ICP parameters listed in Part C of Schedule 2 (as applicable);

responsible meter owner means, for a particular ICP, the meter owner whose meter owner code is shown on the registry as the responsible meter owner and is thereby responsible for the ICP parameters listed in Part D of Schedule 1;

retailer means a person who supplies gas to a consumer at a consumer installation;

rules means these Gas (Switching Arrangements) Rules 2006 as amended from time to time and includes every schedule to the rules, any code of practice and any technical code made pursuant to the rules, and every amendment to deletion of, or addition to, any of the rules;

standard switch means a switch where a consumer, being supplied gas at a particular consumer installation elects to have gas supplied at that consumer installation by another retailer;

switch means the process by which the retailer supplying gas to a consumer installation is changed, and by which the ICP's responsible retailer is changed;

switch date means the date on and from which a new retailer supplies gas to a consumer installation;

switch reading means the register reading that applies to the switch date;

unaccounted for gas means the difference measured over a 12-month period between the **gas injected** into a gas distribution network, and the **gas delivered** from that network to consumers (including to embedded networks);

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Comment [A3]: I have also added definitions fo r 'gas injected' and 'gas delivered'

view access means a person is authorised to view information accepted in the registry; and

write access means a person is authorised to view and maintain certain information in the registry.

4.3 Where in these rules the registry is required to abide by a rule, the meaning is that the registry is designed and established to perform

according to the rule without the direct involvement of the registry operator.

4.4 A reference to a rule is a reference to a rule in these rules unless the reference specifically states otherwise.

Registry participants

5. Obligation to supply registration information

5.1 All registry participants must supply registration information to the registry operator.

5.2 Registration information consists of –

5.2.1 The name of the registry participant; and

5.2.2 The registry participant's telephone number, physical address, facsimile number, email address, and postal address; and

5.2.3 Identification as to which class, or classes, of registry participant (retailer, distributor, meter owner or allocation agent) that the registry participant belongs; and

5.2.4 In the case of an allocation agent, the identity of the gas gates and gas distribution systems in relation to which the allocation agent operates.

5.3 Registration information must be given in the form and manner required by the registry operator as approved by the Co-regulatory body.

6. When registration information must be supplied

6.1 Every person that is a registry participant at the date these rules come into force must supply the registration information before **[insert date]**.

6.2 Every person that becomes a registry participant after the date that these rules come into force must supply the registration information within **[at least 10 business days before]** becoming a registry participant.

Deleted: 20 business days] of

Comment [A4]: It would be impractical for a party to be a registry participant for 20 days before the details were supplied.

7. Registry operator must keep registry participant register

7.1 The registry operator must keep a register of registry participants.

7.2 The register must state –

7.2.1 The registration information in respect of the registry participant; and

7.2.2 The date on which the registry participant was registered; and

7.2.3 The date on which the person ceases to be a registry participant.

8. Changes to particulars

8.1 Every registry participant must notify the registry operator as soon as practicable –

8.1.1 Of any change in the registry participant's registration information; and

8.1.2 If the person ceases to be a registry participant.

8.2 The registry operator must record the change, and the date of change, in the register on receipt of the notice.

8.3 The registry operator must publish the change as soon as possible after recording that change.

9. Effect of registration

9.1 A registry participant is bound by these rules regardless of whether or not the registry participant is registered.

10. Effect of ceasing to be registry participant

10.1 A person continues to be liable for all acts and omissions in respect of these rules, despite the fact that the person ceases to be a registry participant, and the person will be deemed to be a registry participant for that purpose.

Registry operator

11. Appointment of registry operator

11.1 The Co-regulatory body may, from time to time, by agreement with a person appoint that person to act as the registry operator.

11.2 The registry operator has the functions, rights, powers, and obligations set out in these rules.

11.3 The term of appointment of a person as the registry operator, and the date on which the term begins, will be as set out in the registry operator service provider agreement.

11.4 The Co-regulatory body may at any time terminate, re-appoint, or change the appointment of any person as the registry operator subject to the terms of the registry operator service provider agreement.

11.5 The remuneration of the registry operator will be as agreed between the Co-regulatory body and the registry operator in the registry operator service provider agreement.

11.6 The Co-regulatory body and the registry operator may agree on any other terms and conditions, not inconsistent with the functions, rights, powers, and obligations of the registry operator under these rules.

12. Other terms of registry operator service provider agreement

12.1 In addition to any other terms and conditions required by these rules, the registry operator service provider agreement must provide for–

12.1.1 The availability levels of the registry; and

12.1.2 Service response times; and

12.1.3 Registry system upgrades; and

12.1.4 Registry system maintenance; and

12.1.5 Data integrity and recovery of data; and

12.1.6 The handling of faults.

12.2 The registry operator service provider agreement must specify that the registry operator must maintain close contact with distributors, retailers, and meter owners, and provide additional services and support to ensure that the registry remains responsive to and consistent with the needs of the registry participants.

12.3 The registry operator service provider agreement must specify that the registry must be open and operational between 7:30 am and 7:30 pm every business day.

13. Publication of registry operator service provider agreement

The Co-regulatory body must publish the registry operator service provider agreement.

14. Insurance cover

The registry operator must at all times maintain any insurance cover that is required by the registry operator service provider agreement, on terms and in respect of risks approved by the Co-regulatory body, with an insurer approved by the Co-regulatory body.

15. Performance standards to be agreed

The Co-regulatory body and the registry operator must, at the beginning of the term of the appointment and at the beginning of each financial year, agree on a set of performance standards against which the registry operator's actual performance must be reported and measured at the end of the financial year.

16. Self-review must be carried out by registry operator

16.1 The registry operator must conduct, on a monthly basis, a self-review of its performance.

16.2 The review must concentrate on the registry operator's compliance with –

16.2.1 Its obligations under these rules; and

16.2.2 The operation of these rules; and

16.2.3 Any performance standards agreed between the registry operator and the Co-regulatory body; and

16.2.4 The provisions of the registry operator service provider's agreement.

17. Registry operator must report to Co-regulatory body

17.1 The registry operator must, within 10 business days of the end of each month, provide a written report to the Co-regulatory body on the results of the review carried out under rule 16.

17.2 The report must contain details of –

17.2.1 Any circumstances identified by the registry operator where it has failed, or may have failed, to comply with its obligations under these rules; and

17.2.2 Any area that, in the opinion of the registry operator, a change to a rule may need to be considered; and

17.2.3 Any other matters that the Co-regulatory body, in its reasonable discretion, considers appropriate and asks the registry operator, in writing within a reasonable time before the report is provided, to report on.

17.3 As soon as practicable after receiving a report under rule 17.1, the Co-regulatory body must publish that report.

18. Review of registry operator performance by Co-regulatory body

18.1 At the end of each financial year, the Co-regulatory body may review the manner in which the registry operator has performed its duties and obligations under these rules.

18.2 The review must concentrate on the registry operator's compliance with –

18.2.1 Its obligations under these rules; and

18.2.2 The operation of these rules; and

18.2.3 Any performance standards agreed between the registry operator and the Co-regulatory body; and

18.2.4 The provisions of the registry operator service provider's agreement.

19. Audits of the registry

19.1 In addition to the review specified in rule 18, the Co-regulatory body may carry out audits of the records and procedures of the registry within normal working hours on reasonable notice.

19.2 In respect of any audit, the registry operator must –

19.2.1 Provide any auditor appointed by the Co-regulatory body with reasonable access to all relevant facilities, personnel, records, and manuals; and

19.2.2 Provide the auditor with any additional information that the auditor reasonably considers necessary to enable an assessment of whether the registry continues to meet the requirements of these rules.

19.3 In accordance with any provisions in the service provider agreement between the Co-regulatory body and the registry operator, the registry operator must implement any changes necessary to give effect to any reasonable recommendations made by the auditor, with the objective of constantly improving services.

Funding of the registry

20. Development Fee

20.1 The development fee is a one-off fee to meet the costs of developing and establishing the registry ("registry development costs").

20.2 The Co-regulatory body must determine the registry development costs prior to proceeding with the development of the Registry. The registry development costs will include –

20.2.1 The capital costs associated with the development of the registry; and

20.2.2 The costs associated with the appointment of the registry operator; and

20.2.3 The administrative costs of the Co-regulatory body in connection with the development and establishment of the registry; and

20.2.4 Any other costs that are determined by the Co-regulatory body to form part of the registry development costs, including costs of the initial loading and validation of the Registry database (whether or not such costs have been incurred at the time that the registry development costs are determined).

20.3 Once it has determined the registry development costs, the Co-regulatory body will publish those costs (including a breakdown of the costs) on the Co-regulatory body's website.

20.4 Every person who is a distributor or retailer on the commencement date is liable to pay a development fee in accordance with these rules.

20.5 The development fee payable by each distributor is calculated as follows:

$A = (B \times 0.2) \times (C/D)$

Where:

A = the development fee payable by a distributor A; and

B = the registry development costs; and

C = the number of ICPs as at the commencement date for which distributor A is a responsible distributor; and

D = the total number of ICPs as at the commencement date.

20.6 The development fee payable by each retailer is calculated as follows:

$A = (B \times 0.8) \times (C/D)$

Where:

A = the development fee payable by retailer A; and

B = the registry development costs; and

C = the number of ICPs as at the commencement date for which retailer A is a responsible retailer; and

D = the total number of ICPs as at the commencement date.

21. How and when development fee must be paid

21.1 The development fee is payable to the Co-regulatory body.

21.2 The Co-regulatory body must invoice every registry participant liable to pay a development fee as soon as practicable after the Co-regulatory body has determined the development fee.

21.3 The due date for the payment of the development fee is the tenth business day after the registry participant receives an invoice for the development fee.

22. Ongoing fees

22.1 The ongoing fees are monthly fees to meet the costs of operating and maintaining the registry ("ongoing costs").

22.2 Prior to the start of each financial year the Co-regulatory body must determine the budgeted ongoing costs for that financial year.. The ongoing costs will include –

22.2.1 The budgeted costs payable to the registry operator in respect of the coming financial year; and

22.2.2 The budgeted administrative costs of the Co-regulatory body associated with the registry and its role under these rules during the coming financial year; and

Comment [A5]: Refer to allocation of benefits and costs, as per Vector's submission.

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Comment [A6]: Refer to allocation of benefits and costs, as per Vector's submission.

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22.2.3 Any other costs that are determined by the Co-regulatory body to form part of the ongoing costs for the coming financial year.

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22.3 Once it has determined the budgeted ongoing costs for the coming financial year, the Co-regulatory body will publish those costs (including a breakdown of the costs) on the Co-regulatory body's website, and divide them by twelve to determine the monthly ongoing fees to be levied against industry participants.

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22.4 Every person who, on the first business day of a month, is a distributor or retailer is liable to pay an ongoing fee for that month in accordance with these rules.

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22.5 The ongoing fees payable by each distributor is calculated as follows:

$A = (B \times 0.2) \times (C/D)$

Comment [A7]: Refer to allocation of benefits and costs, as per Vector's submission

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Where:

A = the ongoing fee payable by distributor A; and

B = the ongoing costs for month B; and

C = the number of ICPs as at the first business day of month B for which distributor A is a responsible distributor; and

D = the total number of ICPs as at the first business day of month B.

22.6 The ongoing fees payable by each retailer is calculated as follows:

$A = (B \times 0.8) \times (C/D)$

Comment [A8]: Refer to allocation of benefits and costs, as per Vector's submission.

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Where:

A = the ongoing fee payable by retailer A; and

B = the ongoing costs for month B; and

C = the number of ICPs as at the first business day of month B for which retailer A is a responsible retailer; and

D = the total number of ICPs as at the first business day of month B.

22.7 The ongoing fees payable by each meter owner is calculated as follows:

$A = (B \times 0) \times (C/D)$

Comment [A9]: Refer to allocation of benefits and costs, as per Vector's submission.

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Where:

A = the ongoing fee payable by meter owner A; and

B = the ongoing costs for month B; and

C = the number of ICPs as at the first business day of month B for which meter owner A is a responsible meter owner; and

D = the total number of ICPs as at the first business day of month B.

23. How and when ongoing fees payable

23.1 The on-going fees are payable to the Co-regulatory body.

23.2 The Co-regulatory body must invoice every person who, on the last business day of a month, is a distributor or retailer, for the ongoing fees for that month as soon as practicable after the start of the following month.

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23.3 The due date for the payment of the on-going fees is the later of –

23.3.1 The tenth business day after the distributor or retailer or meter owner receives an invoice for that payment; or

23.3.2 The 20th day of the month following the month to which an invoice relates.

24. General provisions regarding fees

24.1 Any person who is liable to pay any fee under rules 20 to 24 inclusive, who fails to make payment of such fee on or before the date on which it falls due is liable to pay an additional fee of 10% of the amount of the fee that is unpaid.

24.2 The additional fee becomes payable and due on the 10th business day after the date that the Co-regulatory body notifies the person that an additional fee is payable.

24.3 The fees payable under rules 20 to 24 inclusive are exclusive of any goods and services tax payable under the Goods and Services Tax Act 1985.

Compliance

25. Compliance

The Gas (Compliance) Regulations 2006 apply to these rules.

Notices and receipt of information

26. Giving of notices

26.1 If these rules require any notice to be given, the notice must be in writing and be –

26.1.1 Delivered by hand to the nominated office of the addressee; or

26.1.2 Sent by post to the nominated postal address of the addressee; or

26.1.3 Sent by facsimile to the nominated facsimile number of the addressee; or

26.1.4 Sent by electronic transmission or any other similar method of electronic communication to the appropriate nominated electronic address of the addressee.

26.2 In the case of an emergency, a person may give notice other than in accordance with rule 23.1, but the person must as soon as practicable, confirm the notice in writing and by a method set out in rule 23.1.

27. When notices taken to be given

In the absence of proof to the contrary, notices are taken to be given,-

27.1 In the case of notices delivered by hand to a person, when actually received at that person's address:

27.2 In the case of notices sent by post, at the time when the letter would in the ordinary course of post be delivered; and in proving the delivery, it is sufficient to prove that the letter was properly addressed and posted:

27.3 In the case of notices sent by fax, at the time indicated on a record of its transmission:

27.4 In the case of notices sent by electronic transmission or any other similar method of electronic communication, -

27.4.1 At the time the computer system used to transit the notice –

(a) Has received an acknowledgment or receipt to the electronic mail address of the person transmitting the notice; or

(b) Has not generated a record that the notice has failed to be transmitted; or

27.4.2 The person who gave the notice proves the notice was transmitted by computer system to the electronic address provided by the addressee.

28. Entering information in the registry

For the purposes of these rules, any reference to entering information in the registry means an attempt by the responsible distributor, responsible retailer, or responsible meter owner to enter information in the registry by electronic transmission or any other similar method of electronic communication (for example and without limitation, using a web browser or file batch transfer).

29. Registry acceptance or rejection of information and notices

29.1 For the purposes of these rules,-

29.1.1 Any reference to the acceptance of information in the registry or the giving of notices to the registry means that the attempt to enter information in the registry or to give a notice to the registry has been successful and the information or the notice is recorded in the registry; and

29.1.2 Any reference to the rejection of information by the registry or the rejection of a notice by the registry means that the attempt to enter information in the registry or to give the notice to the registry has been unsuccessful and that the information or the notice is not recorded in the registry.

29.2 If these rules require the registry to give a notice to a distributor, retailer, or meter owner stating that any information or notice provided by the party concerned has been rejected by the registry, the notice must be dated and include the reason for the rejection.

30. Registry notification of a changes to ICP parameter values

30.1 For the purposes of these rules, if the registry is required to give a notice to a distributor, retailer or meter owner because a change to an ICP parameter value has been accepted in the registry, the notice must identify the ICP and ICP parameter concerned and state the new ICP parameter value.

30.2 If during the course of a business day, there has been more than one change to a particular ICP parameter value, any notice given by the registry must state the all the changes accepted by the registry on that day.

30.3 All notices of changes to ICP parameter values must be date and time stamped according to the date and time that the change was accepted by the Registry, as well as having a cross-reference to the party making the change, and the date that the change took effect from.

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Access to the registry

31. Registry access

31.1 Subject to rule 32, the following persons have view access to any of the information accepted in the registry in relation to any individual ICP:

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31.1.1 Every registry participant; and

31.1.2 Any other person authorised by the Co-regulatory body to have view access to the registry.

31.1.3 View access will be restricted as follows:

Any distributor, retailer, or meter owner may make a view request which returns multiple ICPs, provided that each one of those ICPs are already "owned" by the requester[2]; otherwise;

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[2] For example, a view request made by a retailer, based on a street parameter would return only those ICPs in that street where the ICP was currently the responsibility of that retailer.

View requests will be restricted to one ICP identifier for each view request.

31.2 The following persons have write access to ICP parameter values in the registry in relation to any individual ICP:

31.2.1 Every distributor, retailer, and meter owner in relation to the initial population of the registry as set out in rules 40 and 41; and

31.2.2 Every distributor, retailer, and responsible meter owner in relation to the creation and readying of new ICPs as set out in rules 47 to 53; and

31.2.3 Every responsible distributor, responsible retailer, and responsible meter owner in relation to maintaining the values of the ICP parameter each ICP for which they are responsible as set out in rule 54.

31.3 The Co-regulatory body, in consultation with distributors, retailers, and meter owners, must determine any access restrictions in respect of distributors, retailers, and owners in relation to reports, and response times for those reports, from the registry.

31.4 Subject to rule 31.3, registry participants may request the registry operator to provide customised reports on any or multiple ICPs.

32. View access security for certain information

32.1 A distributor or meter owner for an ICP may restrict view access to the following code or value of the ICP parameters for that ICP by entering a data security flag as "ON" for that ICP:

32.1.1 Maximum hourly quantity;

32.1.2 Network price category code; and/or

32.1.3 Metering price code.

32.2 Other than the ICP parameters included in rules 32.1, the codes or values given to the data security flags must not restrict view access to any other information on the registry.

32.3 If a data security flag has been entered "ON" in the registry in accordance with rule 32.1, the code or value of that ICP parameter is not subject to view access.

32.4 If a distributor for an ICP enters a data security flag as "ON" for that ICP, the registry must provide view access only to the distributor, retailer and meter owner for that ICP, for the following ICP parameters:

32.4.1 Maximum hourly quantity; and

32.4.2 Network price category code.

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32.5 If a meter owner for an ICP enters a data security flag as "ON" for that ICP, the registry must provide view access only to the distributor, retailer and meter owner for that ICP, for the metering price code ICP parameter.

32.6 Despite rules 32.3 to 32.5 (inclusive), if a registry participant, or any other person authorised by the Co-regulatory body under rule 31.1.2, wishes to view the codes or values of any ICP parameter to which a data security flag with a value of "ON" relates, the registry participant or other authorised person (as the case may be) must give a secured information request to the registry.

32.7 A secured information request must state the ICP identifier of the ICP for which the secured information is requested, and must contain no more than one ICP identifier for each secured information request.

32.8 Within one business day of receiving a secured information request, the registry must –

32.8.1 These sections need to be rewritten.

Other provisions relating to the registry and registry participants

33. Obligation of registry participants to act reasonably

33.1 In light of the purpose of the registry as set out in rule 38, every registry participant must act reasonably in relation to its dealings with the registry and, in doing so, must use its reasonable endeavours to co-operate with other registry participants.

33.2 In relation to use of the data security flags as set out in rule 32, distributors and meter owners must act responsibly in terms of their selection of which ICPs should have "ON" security flags, so as to not subject other registry participants to unnecessary secure information requests.

33.3 Rules 30.1 and 30.2 do not limit any other obligations a registry participant may have under these rules.

34. Other obligations of registry participants

34.1 Each registry participant must ensure that any software for the registry is used in a proper manner by competent employees or by persons under the supervision of those employees.

34.2 No registry participant may request, permit, or authorise anyone other than the registry operator to provide support services in respect of any software for the registry.

34.3 Each registry participant must appoint a nominated manager to be responsible for all of that registry participant's communications with the registry.

35. Use of ICP identifier on invoices

Comment [A10]: This section does not meet the intent of the rules, and needs to be rewritten. As rule 38.2 stands anybody who gives a secured information request to the registry will be provided with the secured information, and the owner of that secured information will then be told that it has been provided to a third party (who is free to do whatever with it).

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¶
Give a notice to the distributor and meter owner for the relevant ICP, advising that the information has been provided to the registry participant or other authorised person (as the case may be) who gave the request.

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Comment [A11]: Why not?

35.1 Every retailer must ensure that the relevant ICP identifier is printed on any invoice or associated documentation relating to the sale of gas by the retailer to a consumer.

35.2 The ICP identifier must be clearly labelled “ICP” on the invoice.

36. Consumer queries

Every retailer and distributor must advise any consumer (or any person authorised by the consumer) of the consumer's ICP identifier within three business days of receiving a request for that information.

Part 2

Gas Registry

Establishing the registry

37. Establishment of registry

37.1 The registry operator must establish, operate and maintain the registry so as to meet the requirements of these rules.

37.2 The registry must be established by [**insert date prior to go-live date**].

37.3 The registry must be available for operation by [**insert go-live date**].

38. Purpose of registry

The purpose of the registry is –

38.1 To facilitate efficient and accurate switching of retailers by consumers; and

38.2 To provide an authoritative database of current and historical information on all ICP parameters, to facilitate accurate billing of consumers and allocation of charges to retailers; and

38.3 To provide a mechanism by which the accuracy and timeliness of information provided in relation to an ICP is controlled and recorded

39. Requirements of registry

The registry must –

39.1 Comply with, and perform in accordance with, the registry specification; and

39.2 Fulfil the purpose of the registry as set out in rule 38; and

39.3 Subject to the validation requirements set out in these rules, accept the information and notices referred to in these rules; and

39.4 Maintain a complete audit trail for all information and notices accepted in accordance with these rules; and

39.5 Maintain records that enable allocation and reconciliation of energy charges, line charges and metering charges between retailers; and

39.6 Facilitate switches in accordance with these rules; and

39.7 Otherwise perform in accordance with the requirements of these rules.

40. Initial population of registry

40.1 By [**insert date, prior to go-live date**] –

40.1.1 Each distributor must enter in the registry values for the ICP parameters listed in Parts A1 and A2 for each ICP on its distribution system; and

40.1.2 Each retailer will receive from the Registry a report listing all ICPs where they are (according to the Registry data loaded by the Distributor) the current Responsible Retailer. For each ICP on this report the Responsible Retailer must enter in the registry values for each of the ICP parameters (except Responsible Retailer code) listed in Part B of Schedule 1, and

40.1.3 Each meter owner will receive from the Registry a report listing all ICPs where they are (according to the Registry data loaded by the Responsible Retailer) the current Meter Owner. For each ICP on this report the Responsible Meter Owner must enter in the registry values for the ICP parameters listed in Part C of Schedule 1.

40.2 When entering information in the registry under rule 40.1, –

40.2.1 Each distributor, retailer, and meter owner, as the case may be, may only assign a value to an ICP parameter in accordance with the rules set out in column 2 of each part of Schedule 1.

40.3 Each distributor, retailer, and meter owner must use its reasonable endeavours to co-operate with each other to enter information in the registry under rule 40.1 having regard to the fact that for each ICP there will be a distributor, retailer, and a meter owner required to enter information in the registry before [**insert go-live date**].

41. Accuracy of initial information

41.1 Between [**insert date, prior to go-live date**] and [**insert go-live date**], each responsible distributor, responsible retailer, and responsible meter owner must check the accuracy of any information entered in the registry in relation to the ICPs for which they are, as the case may be, responsible.

41.2 If, a responsible distributor, responsible retailer, or responsible meter owner, as the case may be, becomes aware that any information in the registry is incorrect, the distributor, retailer, or meter owner must, advise the party responsible for that parameter the correct up-to-date details for that parameter, and the party responsible for that parameter must before [**insert go-live date**], enter the correction in the registry. In particular:

41.3 If the Registry report received by a retailer includes ICPs for which they are ***not*** currently the Responsible Retailer, or omits ICPs for which they ***are*** currently the Responsible Retailer, the retailer will advise the distributor of the switch event which has been omitted from the distributor's records (together with appropriate documentation) so that the Distributor can update the Registry prior to [**insert go-live date**]. Note

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that Responsible Retailer must be correctly recorded before ICP parameters in part B of Section 1 can be updated.

41.4 If the Registry report received by a meter owner includes ICPs for which they are ***not*** currently the Responsible Meter Owner, or omits ICPs for which they ***are*** currently the Responsible Meter Owner, the meter owner will advise the retailer of the meter change event which has been omitted from the retailer's records (together with appropriate documentation) so that the Retailer can update the Registry prior to [**insert go-live date].** Note that Responsible Meter Owner must be correctly recorded before ICP parameters in part C of Section 1 can be updated.

41.5 If any distributor, retailer, or meter owner becomes aware that the Connection status code populated initially by the Distributor is not up-to-date then they must correct the Registry by notifying it of any status change events which have been omitted from the Distributor's records. The process of Registry notification is according to the rules in Schedule 2, and must be completed by [**insert go-live date].**

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Assignment of ICPs to consumer Installations

42. Assignment of ICPs

42.1 Each distributor must assign an ICP for each consumer installation that is connected to its distribution system.

42.2 An ICP must represent a single consumer installation that –

42.2.1 May be isolated from the gas distribution system without affecting any other consumer installation; and

42.2.2 Has a single loss factor and a single network price category; and

42.2.3 Has its gas volume measured directly by a single set of metering equipment complying with NZS5259:1997 (or any subsequent replacement standard) or measured indirectly by a method approved by the Co-regulatory body, producing the equivalent of the measurement from a single set of metering equipment.

Determination of certain ICP parameter codes

43. Co-regulatory body to determine applicable ICP parameter codes

43.1 The Co-regulatory body must determine and publish the codes for the following ICP parameters:

43.1.1 The codes for every distributor, retailer, meter owner, corrector owner, datalogger owner and telemetry owner

that is, or likely to be, required as a value for any ICP parameter on the registry:

43.1.2 The gas gate codes:

43.1.3 The ICP type codes:

43.1.4 The load shedding category codes:

43.1.5 The allocation group codes:

43.1.6 The profile codes:

43.1.7 Disconnection "HOW" codes, used to describe the means by which gas flow is prevented from flowing to the Consumer Installation.

43.1.8 Disconnection "WHY" codes, used to record the reason for disconnection.

43.2 The Co-regulatory body may from time to time amend or revoke any code determined under rule 43.1 and the Co-regulatory body must publish any amendment or revocation of a code.

44. Distributors to determine network price category codes

44.1 Each distributor must determine and publish a schedule of all its network price category codes and their associated charges.

44.2 The schedule must enable the accurate identification of the network pricing applicable to an ICP at any point in time.

44.3 In the event that the distributor has received prior written notice from the Co-regulatory body that it has reasonable cause not to publish the distribution pricing associated with a particular network price code, the distributor may publish that the pricing disclosure is available on application to the distributor.

45. Distributors to determine loss factor codes

45.1 Each distributor must determine and publish a schedule of all its loss factor codes and their associated loss factors.

45.2 The loss factor codes must enable the accurate identification of the applicable loss factor for an ICP at any point in time.

46. Meter owners to determine metering price codes

46.1 Each meter owner must determine and publish a schedule of all its metering price codes and all their associated prices.

Comment [A12]: Definition required of ICP type code – add to Interpretation section.

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46.2 Subject to rule 46.3, the schedule must enable accurate identification of the metering pricing applicable to an ICP at any point in time.

46.3 In the event that the meter owner has received prior written notice from the Co-regulatory body that it has reasonable cause not to publish the metering pricing associated with a particular metering price code, the meter owner may publish that the pricing disclosure is available on application to the meter owner.

Creation of new ICPs

47. Creation of new ICPs

47.1 A retailer may request a distributor to assign an ICP for a new consumer installation on the gas distribution system.

47.2 If the distributor receives a request under rule 47.1, the distributor must, within three business days of receiving that request, assign an ICP to the new consumer installation or advise the retailer of the reason why it is unable to assign an ICP.

47.3 Once a distributor receives confirmation that a new consumer installation is first connected to its gas distribution system, the distributor must within two business days of receiving that confirmation enter in the registry the following minimum information from Part A of Schedule 1:

47.3.1 The ICP identifier:

47.3.2 The ICP creation date:

47.3.3 The responsible distributor code:

47.3.4 The retailer code of the expected retailer

47.3.5 The Connection Status code

47.3.6 The date effective for the most recent change in Connection status

47.3.7 The physical address.

48. Registry validation of ICP creation

48.1 As soon as possible after the ICP and the minimum information has been entered in the registry under rule 47.3, the registry must –

48.1.1 Validate the information entered by confirming –

(a) That the ICP identifier is a valid code and does not otherwise exist in the registry; and

(b) That the distributor code is an available and valid code for the sender; and

(c) That the ICP creation date is not a future date.

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48.1.2 Based on the validation result, accept or reject the ICP and the minimum information and give a notice to the distributor stating that the ICP has been accepted or rejected.

48.2 If the ICP is accepted in the registry, on acceptance, the registry must Show the ICP status code as NEW (the connection status code will remain as entered by the Distributor, and will reflect the physical status of the connection, as advised by field staff).

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48.3 Within one business day of having accepted the ICP and the minimum information in the registry, give a notice to the distributor stating the ICP parameters accepted in the registry for that ICP.

49. Readying of new ICP and registry validation

49.1 Once a distributor has identified the values or codes of the remaining ICP parameters listed in Part A of Schedule 1 (i.e. not the minimum information required under rule 47.3) with respect to a new consumer installation, the distributor must, within two business days of identifying those remaining ICP parameters, enter them in the registry.

49.2 As soon as possible after the remaining ICP parameters have been entered in the registry, the registry must –

49.2.1 Validate the ICP parameter values entered by confirming that they are available and valid values for the distributor; and

49.2.2 Based on the validation result, accept or reject any or all the ICP parameter values and give a notice to the distributor stating the values have been accepted or rejected.

49.3 Once the full set of values for the ICP parameters listed in Part A of Schedule 1 are accepted in the registry, on acceptance the registry must show the ICP status code as READY, (the connection status code will remain as entered by the Distributor, and will reflect the physical status of the connection, as advised by field staff).

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49.4 Within one business day of having accepted the remaining ICP parameters in the registry, the registry must give notice to the distributor and the retailer stating those ICP parameters that have been accepted in the registry for the ICP.

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50. Retailer for READY ICP

50.1 Subject to rule 50.2, within two business days of a retailer entering into a contract to supply gas to a consumer at a consumer installation for which its ICP has an ICP Status value of READY, the retailer must –

50.1.1 Enter in the registry values for all of the ICP parameters listed in Part B of Schedule 1; and

50.1.2 The ICP status code will then remain as READY through the lifetime of the ICP until it is eventually decommissioned.

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50.2 A retailer must not record any information in the registry for an ICP before the ICP status code is READY.

50.3 To avoid any doubt, the retailer that enters information under rule 50.1 may or may not be the retailer referred to in rule 49.4.

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51. Registry validation of first retailer information

51.1 As soon as possible after all the ICP parameter values referred to in rule 50.1 has been entered in the registry, the registry must –

51.1.1 Validate the information entered by confirming that they are available and valid values for the entering retailer; and

51.1.2 Based on the validation result, accept or reject any or all the ICP parameter values and give a notice to the entering retailer stating the values have been accepted or rejected.

51.2 Within one business day of having accepted the information in the registry, the registry must give notice to the distributor, retailer, and meter owner stating the ICP parameter values accepted in the registry for that ICP.

52. Meter owner information for new ICP[3]

52.1 Within the timeframe specified in rule 52.2, the meter owner for an ICP must enter in the registry values for all the ICP parameters listed in Part C of Schedule 1.

52.2 The timeframe is within two business days after that meter owner –

52.2.1 Has confirmed that the metering equipment has been installed at the new consumer installation; and

52.2.2 Has been notified of the information under rule 51.2 in relation to the ICP.

53. Registry validation of first meter owner information

53.1 As soon as possible after the ICP parameters referred to in rule 52.1 have been entered in the registry, the registry must –

53.1.1 Validate the information entered by confirming that they are available and valid values for the entering meter owner; and

53.1.2 Based on the validation result, accept or reject any or all the ICP parameter values and give a notice to the entering meter owner stating the values have been accepted or rejected.

[3] A rule change is required to provide for the situation where a new gas supply has been set up, and a meter installed, but the owner or tenant has not yet chosen which retailer they wish to purchase gas from. As the rules stand currently the meter owner is prevented from entering meter details because the retailer must first identify the Responsible Meter Owner. This sequence is not logical, as the gas meter may be installed at a spec house long before the house is sold,; the ultimate purchaser may choose several months later which retailer they wish to contract with.

53.2 Within one business day of having accepted the ICP parameters in the registry, the registry must give notice to the distributor, retailer and meter owner for that ICP stating the ICP parameters that have been accepted in the registry for that ICP.

Maintenance of ICP information

54. ICP information to be maintained

54.1 Each distributor, retailer, and meter owner must use its reasonable endeavours to maintain current and accurate information in the registry in relation to the ICPs and the ICP parameters for which, as the case may be, it has responsibility as set out in Schedules 1 and 2.

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54.2 Each distributor, retailer, and meter owner must record on the registry the details of any event which has the effect of changing ICP connection status as a result of field work managed by them. The following details are to be provided for each such event:

- ICP number
- New connection status code, as per Schedule 2 Part A.
- In the event of a disconnection, a HOW code as per Schedule 2, part B, to describe the means by which gas flow is prevented from flowing to the Consumer Installation.
- In the event of a disconnection, a WHY code as per Schedule 2, part C, to describe the reason for the disconnection.
- Details of the date and time that the field work was completed.
- Sufficient details to provide an audit trail back to field work records held by the distributor, retailer, or meter owner and/or their field service contractor.

These details must be entered onto the Registry within 3 days of the completion of the field work described.

54.3 Each distributor, retailer, and meter owner must record on the registry the details of any site visit managed by them which establishes that the current physical connection status of an ICP is different to the current connection status recorded in the registry. The following details are to be provided for each such site visit:

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- ICP number
- New connection status code, as per Schedule 2 Part A.
- In the event of finding that the gas is currently disconnected, a HOW code as per Schedule 2, part B, to describe the means by which gas flow is prevented from flowing to the Consumer Installation.
- In the event of finding that the gas is currently disconnected, a WHY code as per Schedule 2, part C, to describe (so far as can be ascertained) the reason for the disconnection.
- Details of the date and time that the site visit was made.
- Sufficient details to provide an audit trail back to site audit records held by the distributor, retailer, or meter owner and/or their site auditor.

These details must be entered onto the Registry within 3 days of the completion of each such site visit.

54.5 The intention of rules 55.3 and 54.4 is that the Registry should be provide a true and complete historical record of all events which affect the connection status of an ICP, where such events have been managed by the responsible distributor, responsible retailer, or responsible meter owner, as the case may be. However, notwithstanding the above, the connection status recorded in the Registry may not reflect the current physical connection status, and must not be relied on for any purpose other than the facilitation of gas switching arrangements.

55. Correction of ICP information in registry and registry validation[4]

55.1 If, in relation to any information in the registry a responsible distributor, responsible retailer, or responsible meter owner, as the case may be, becomes aware that such information is incorrect or requires updating, the responsible distributor, responsible retailer, or responsible meter owner must, as soon as practicable, enter the correct or updated information in the registry.

55.2 As soon as possible after the information referred to in rule 55.1 has been entered in the registry, the registry must –

55.2.1 Validate the information entered by confirming that they are available and valid values for the party that entered the information; and

55.2.2 Based on the validation result, accept or reject the information in the registry by giving a notice to the party that entered the information, that the information has been accepted or rejected.

55.3 Within one business day of having accepted the information in the registry, the registry must give notice to the distributor, retailer, and meter owner in accordance with rule 30.

55.4 If the registry is required to give a notice under rule 55.3 and a gas switching notice has been given in respect of the ICP but the switch is not yet complete, in giving notice under rule 55.3 to a retailer, the registry must give notice to both the retailer and the new retailer.

56. Distributors, retailers, and meter owners to resolve discrepancies

56.1 In relation to any information for an ICP in the registry, the distributor, retailer, and meter owner must, to the best of their abilities, resolve any discrepancies between the information held in the registry and the information held elsewhere by that distributor, retailer and meter owner for billing, allocation and reconciliation purposes.

[4] Note that the current rules in Schedule 2 and Schedule 3 prevent the distributor from updating the connection status if (a) the distributor carries out field work which changes the connection status; of (b) observes from a site audit that the current physical connection status is different to that recorded on the Registry. Vector supports the concept of rules 54 and 55, and has therefore rewritten Schedule 2, and deleted Schedule 3, with the intention of allowing rules 54 and 55 to be implemented and enforceable.

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56.2 In order to resolve any discrepancies for an ICP, each distributor, retailer, and meter owner, as the case may be, must, by 4pm on the fifteenth business day of each month, review the following relevant reports and enter any corrections in the registry using the procedure under rule 55 to correct any information:

56.2.1 The retailer report under rule 81; and

56.2.2 The distributor report under rule 82; and

56.2.3 The meter owner report under rule 83.

56.3 Each distributor, retailer, and meter owner must retain records of the reviews and subsequent changes under rule 56.2 for any subsequent audit that may be conducted by, or on behalf of, the Co-regulatory body.

57. Loss factors

57.1 For the purposes of maintaining loss factor codes in the registry, a loss factor code may have a maximum of one loss factors per month.

57.2 If a distributor intends to add or delete any loss factor codes or change the value or applicable time period of any loss factor, the distributor must, at least two months before any such changes takes effect, give notice of the impending changes to –

57.2.1 The registry operator; and

57.2.2 All registry participants that will be affected by the changes.

58. Distributors to give notices in relation to gas gates

58.1 If a distributor intends to create or decommission a gas gate, the distributor must, at least 20 business days before the creation or decommissioning takes effect, give notice of that gas gate creation or decommissioning to –

58.1.1 The registry operator, and

58.1.2 All allocation agents and retailers that will be affected by the gas gate creation or decommissioning.

58.2 When a distributor gives notice of the creation of a new gas gate or decommissioning of a gas gate, the notice must include –

58.2.1 the gas gate code assigned by the Company to the new gas gate; and

58.2.2 the date of creation of the new gas gate and from which any impacts on billing and allocation take effect; and

58.2.3 the gas gate code of the new gas gate's parent gas gate; and

Comment [A13]: This change is consequential to the change in definition of loss factor

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58.2.4 the ICP identifier of all ICPs created or decommissioned or transferred between gas gates in association with the creation of the new gas gate.

Switching

59. Switching retailers

59.1 Rules 60 to 76 apply to standard switches and move switches.

60. Codes relevant to switching

60.1 The Company must determine and publish codes for the following:

60.1.1 The codes used in the switch notice to denote whether the switch is a standard switch or a move switch; and

60.1.2 Registry content codes associated with switch readings in transfer notices; and

60.1.3 Acceptance codes for gas acceptance notices; and

60.1.4 Reason codes for gas switching withdrawal notices.

60.2 The Company may from time to time amend or revoke any code determined under rule 60.1 and the Company must publish any amendment or revocation of a code.

61. Initiation of switch

61.1 The switching of retailers is initiated by the new retailer under the authority of the consumer electing the change.

61.2 Before the new retailer may initiate a switch, the new retailer must –

61.2.1 Have entered into a contract with the consumer for the supply of gas to the relevant consumer installation; and/or

61.2.2 Have obtained the consumer's agreement to –

(a) Effecting the switch; and

(b) Establishing the date for commencement of supply through communication with the existing retailer; and

(c) Using an estimated reading from the existing retailer to define the split of variable charges between the existing retailer and the new retailer at the switch date; and

(d) Collecting information relating to the consumer and the consumer installation from the existing retailer and

elsewhere in order to complete the switch and commence gas supply; and

61.2.3 Be a party to a valid and subsisting agreement with the distributor to whose distribution system the relevant consumer installation is connected, allowing the retailer to transport and/or sell gas across that distribution system; and

61.2.4 Be a party to a valid and subsisting gas sale and purchase agreement providing access to a supply of wholesale gas for distribution; and

61.2.5 Be a party to a valid and subsisting agreement with the owner(s) of the metering equipment at the relevant consumer installation, for use of that equipment to measure gas consumption for the ICP; and

61.2.6 Be a party to a valid and subsisting agreements with an allocation agent authorised to allocate gas at that gas gate from which gas is supplied to the ICP.

62. Gas switching notice

62.1 Within two business days after entering into a contract with a consumer for the supply of gas to relevant consumer installation, the new retailer must initiate the switch by giving a gas switching notice to the registry.

62.2 The effect of giving of the gas switching notice is that the new retailer –

62.2.1 Warrants that it has complied with rule 61; and

62.2.2 Is then the agent of the consumer and has authority to obtain from the existing retailer the information specified in these rules for the gas acceptance notice and the gas transfer notice.

63. What gas switching notice must contain

63.1 The gas switching notice must state –

63.1.1 The ICP identifier; and

63.1.2 Whether or not it is a standard switch using the codes defined by the Company; and

63.1.3 In the case of a move switch,-

(a) The requested switch date; and

(b) The physical address of the ICP.

63.2 The gas switching notice may state –

63.2.1 The name of the consumer requesting the switch; and

63.2.2 Subject to rule 63.4, a request for the last twelve months of readings from the meter at the consumer installation; and

63.2.3 In the case of a standard switch, –

(a) Subject to rule 63.3, the requested switch date; and

(b) The physical address of the ICP.

63.3 If the new retailer includes a requested switch date for a standard switch, that date must be not less than seven days after the date the gas switching notice is given to the registry.

63.4 If the new retailer requests the last twelve months of readings from the meter at the consumer installation –

63.4.1 The new retailer and the existing retailer must agree as to how the readings shall be provided; and

63.4.2 The registry will not initially provide any facility to communicate the readings from the existing retailer to the new retailer.

Comment [A14]: Why prevent the registry from ever providing this facility?

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64. Registry validation of gas switching notice

64.1 As soon as possible after having received the gas switching notice, the registry must –

64.1.1 Validate the information contained in the gas switching notice by confirming–

(a) That the ICP status code for the ICP is READY.

(b) That any codes that are used in the notice are available codes; and

© That, in the case of a move switch, there is a requested switch date; and

64.1.2 Based on the validation result, accept or reject the gas switching notice by giving a notice to the new retailer stating that the gas switching notice has been accepted or rejected.

64.2 Within one business day of having accepted the gas switching notice, the registry must give the gas switching notice to the retailer.

65. Response to an accepted gas switching notice

65.1 Within two business days after accepting a gas switching notice from the registry, the retailer must give to the registry–

65.1.1 A gas acceptance notice that states that the retailer intends the switch to take place on an expected switch date; or

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65.1.2 A gas transfer notice that includes all the information required to complete the switch; or

65.1.3 A gas switching withdrawal notice that states that the retailer believes that the gas switching notice should be withdrawn.

65.2 If the retailer gives a gas acceptance notice, it must give a gas transfer notice to the registry within 3 business days after receiving the gas switching notice from the registry.

Comment [A15]: Why 23?

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65.3 Except where a gas switching withdrawal request has been given, the retailer must give a gas transfer notice within two business days of the switch date included in the gas transfer notice.

66. What gas acceptance notice must contain[5]

A gas acceptance notice must state –

66.1 The ICP identifier; and

66.2 An expected switch date which –

66.2.1 May be the requested switch date in the gas switching notice, or may be any other date provided that good reason is provided that it cannot be the requested switch date; but

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66.2.2 Must be no later than 3 business days after the date the responsible retailer received the gas switching notice from the registry; and

Comment [A16]: Why 23 days?

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66.3 An acceptance code, as defined by the Company, to communicate certain information that might be useful to the new retailer in deciding whether to proceed with or withdrawal the switch.

67. Registry validation of gas acceptance notice

67.1 As soon as possible after having received the gas acceptance notice, the registry must –

67.1.1 Validate the gas acceptance notice by confirming that any codes that are used in the notice are available codes; and

67.1.2 Based on the result of that validation, accept or reject the gas acceptance notice by giving a notice to the responsible retailer that the gas acceptance notice has been accepted or rejected.

67.2 Within one business day of having accepted the gas acceptance notice, the registry must give the gas acceptance notice to the new retailer.

67.3 To avoid any doubt, if a gas acceptance notice is rejected by the registry, the responsible retailer must still comply with rule 65.

[5] This rule needs to be amended to cater for the situation where there are multiple meters. In this case the data identified by rules 68.1.4 – 68.1.8 would need to be repeated for each meter.

68. What gas transfer notice must contain

68.1 A gas transfer notice must state –

68.1.1 The ICP identifier; and

68.1.2 Subject to rule 68.2, the switch date; and

68.1.3 An annualised consumption (in gigajoules) estimate for the ICP; and

68.1.4 The meter location code; and

68.1.5 The date of the last actual reading recorded for the ICP; and

68.1.6 The meter identifier; and

68.1.7 The meter pressure; and

68.1.8 For each reading for which information is being conveyed –

(a) The multiplier; and

(b) The number of dials on the meter; and

(c) The switch reading; and

(d) Whether the meter reading is an actual reading or an estimated reading; and

(e) The registry content code for the meter reading; and

68.1.9 Any additional information that can be reasonably expected to be important to the accuracy of the switch and subsequent consumer billing and allocation processes.

68.2 If the gas switching notice included a requested switch date, the retailer must –

68.2.1 Use the requested switch date as the switch date and provide switch readings applicable to that date; or

68.2.2 If the retailer has billed a consumer for the ICP up to a date after the requested switch date, use the day after the billed-to-date as the switch date and the billed readings as the switch readings.

68.3 If, due to a transitional exemption provided by the Co-regulatory body, an ICP has more than one meter, the meter identifiers of the meters not identified as set out in rule 68.1.6 must be included in the gas transfer notice as additional information as provided for under 68.1.9.

69. Registry validation of gas transfer notice

69.1 As soon as possible after having received the gas transfer notice, the registry must –

69.1.1 Validate the information in the gas transfer notice by confirming–

(a) That any codes that are used in the notice are available codes; and

(b) That the number of digits provided for each register reading is equal to the number of dials specified for the relevant register; and

69.1.2 Based on the validation result, accept or reject the notice by giving an acknowledgement to the old retailer that the notice has been accepted or rejected.

69.2 Within one business day of having accepted the gas transfer notice, the registry must –

69.2.1 Give the gas transfer notice to the new retailer; and

69.2.2 Give the transfer notice to the distributor, and

69.2.3 Give a notice to the old retailer, the new retailer, the distributor, and the meter owner, confirming the identify of the new retailer and the switch date.

69.3 Once the registry has accepted a gas transfer notice, the registry must show the new retailer as the retailer on and from the switch date.

70. Accuracy of switch readings

70.1 In the gas transfer notice, the responsible retailer must provide switch readings (whether actual readings or estimated readings) that are as accurate as feasible for the particular method used to collect or derive the readings (as the case may be).

70.2 In order to facilitate the accuracy of switch readings for move switches,-

70.2.1 The existing retailer must continue to take actual meter readings from the metering equipment for all ICPs where the ICP status code is ACTC (Active - Contracted); and

70.2.2 All relevant actual readings must be included in the existing retailer's processes to determine the (actual or estimated) switch readings for the gas transfer notice.

70.3 In relation to an ICP that is switched while its ICP status code is INACT (Inactive - Transitional) and the existing retailer uses estimated readings for the switch readings, the existing retailer will comply with rule 70.1 if the existing retailer –

70.3.1 Continued to collect actual readings from the metering equipment (in accordance with the existing retailer's normal reading schedule) until the physical disconnection of the ICP's consumer installation; and

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Comment [A17]: This will allow distributors to validate consumption provided during the period of the losing retailer's contract.

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70.3.2 Used those actual readings in the derivation of the estimated readings for the ICP.

70.4 If the metering equipment for any ICP resets to zero after each actual reading, the gas transfer notice may specify that the switch reading is zero.

70.5 If the consumer installation is un-metered, and the volume of gas supplied is determined by the difference between register readings at other consumer installations and gas gates, the gas transfer notice must specify that the switch reading is zero.

71. Withdrawal of switching

71.1 A switch may only be withdrawn if –

71.1.1 There has been an error in the switch process such that the switch is not giving effect to or has not given effect to the actual situation desired by the consumer; or

71.1.2 The consumer, exercising his or her contractual or statutory rights, has requested the switch to be withdrawn.

71.2 A switch withdrawal may only be initiated by –

71.2.1 In the case of a switch that is in-progress (where a new retailer has given a gas switching notice to the registry but has not received a gas transfer notice), either the retailer or the new retailer; or

71.2.2 In the case where a switch has been completed, by the retailer or the former retailer.

71.3 A switch withdrawal must be initiated by means of a gas switch withdrawal notice being given to the registry and, for any particular switch, a gas switch withdrawal notice may be issued only in the period between –

71.3.1 The date that the gas switch notice is sent to the registry by the new retailer; and

71.3.2 The date that a subsequent (different) gas switch notice is received by the same retailer who is now in the position of retailer for that ICP.

72. What gas switching withdrawal notice must contain

The gas switch withdrawal notice must state –

72.1 The ICP identifier; and

72.2 The reason code for the switching withdrawal.

73. Registry validation of gas switch withdrawal notice

73.1 As soon as possible after having received the gas switch withdrawal notice, the registry must –

73.1.1 Validate the information in the gas switch withdrawal notice by confirming –

(a) That any codes that are used in the notice are available codes; and

(b) That the notice has been given by a retailer authorised to give the notice under rule 71.2; and

73.1.2 Based on the validation result, accept or reject the notice by giving a notice to the retailer that gave the gas switch withdrawal notice that the gas switch withdrawal notice has been accepted or rejected.

73.2 Within one business day of having accepted the gas switch withdrawal notice, the registry must give the gas switching withdrawal notice to the other retailer involved in the switch as set out in rule 71.2 as the case may be.

74. Retailer response to a gas switch withdrawal notice

74.1 Within two business days after receiving a gas switch withdrawal notice, the recipient retailer must give to the registry a gas switch withdrawal response notice.

74.2 The gas switch withdrawal response notice must state whether or not the gas switch withdrawal notice is accepted or rejected. A retailer must accept a gas switch withdrawal notice if –

74.2.1 There has been an error in the switch process such that the switch is not giving effect to the actual situation or has not given effect to the actual situation desired by the consumer; or

74.2.2 The consumer is legally entitled to have the switch withdrawn.

74.3 If the gas switch withdrawal response notice accepts the gas switch withdrawal notice, then –

74.3.1 Within one business day of having received the gas switch withdrawal response notice, the registry must –

(a) Give the gas switching withdrawal response notice to the other retailer involved in the switch as set out in rule 71.2 as the case may be; and

(b) If there has been a change in retailer as a result of the acceptance of the switch withdrawal, give notice to both retailers involved in the switch withdrawal, the distributor, and the meter owner of the change in retailer; and

74.3.2 In the case where rule 71.2.1 applies, the switch in-progress is terminated prior to completion and does not result in a change of retailer for the ICP; and

74.3.3 In the case rule 71.2.2 applies, the completed switch is reversed and there is a change in retailer for the ICP, to the retailer who was the former retailer.

74.4 If the gas switching withdrawal response notice rejects the gas switch withdrawal notice, then –

74.4.1 Within one business day of having received the gas switch withdrawal response notice, the registry must give the gas switching withdrawal response notice to the other retailer involved in the switch as set out in rule 72.2 as the case may be; and

74.4.2 That particular switch withdrawal process is at an end; and

74.4.3 To avoid any doubt, if the gas switch withdrawal notice was given by a retailer as a response to a gas switching notice, the retailer must still comply with rule 65 but may not give another gas switching withdrawal notice for the same gas switching notice.

75. Renegotiation of switch readings

75.1 This rule applies if, in the case where a switch has been completed so that the new retailer is now the retailer in relation to the ICP, the new retailer disputes the accuracy of a switch reading provided by the former retailer to the new retailer, in a gas transfer notice.

75.2 The new retailer may request an adjustment to a switch reading by giving a switch reading renegotiation request notice to the registry.

75.3 For a particular ICP, a switch reading renegotiation request notice may only be given in relation to –

75.3.1 The most recent switch; and

75.3.2 One switch reading.

75.4 The switch reading renegotiation request notice must state –

75.4.1 The ICP identifier; and

75.4.2 The switch date; and

75.4.3 The meter identifier; and

75.4.4 The content code for the switch reading concerned; and

75.4.5 The proposed replacement switch reading.

76. Registry validation of switch reading renegotiation request

76.1 As soon as possible after having received the switch reading renegotiation request, the registry must –

76.1.1 Validate the information in the switch reading renegotiation request notice by confirming that the request has been given by the retailer as authorised by rule 75.1; and

76.1.2 On the basis of that validation, accept or reject the request by giving a notice to the retailer that the request has been accepted or rejected.

76.2 Within one business day of having accepted the switch reading renegotiation request notice, the registry must give the switch reading renegotiation request notice to the former retailer as referred to in rule 75.1.

77. Retailer response to switch reading renegotiation request

77.1 Within two business days after receiving the switch reading renegotiation request notice, the former retailer must give to the registry a switch reading renegotiation response notice stating whether or not the switch reading renegotiation request is accepted or rejected.

77.2 Within one business day of having received the switch reading renegotiation response notice, the registry must give the switch reading renegotiation response notice to the retailer.

77.3 If the switch reading renegotiation request notice is rejected by the former retailer, the two retailers concerned must endeavour to resolve the matter by other negotiation.

78. Bypass switches

78.1 These rules define a bypass switch as having occurred when there has been the simultaneous replacement of both the retailer and the distributor providing their respective services to a consumer installation,

78.2 The registry participants directly involved in effecting a bypass switch must process the bypass switch as the creation of a new ICP or the re-commissioning of an ICP, in accordance with these rules.

78.3 Not less than 14 days before a retailer intends to participate in a bypass switch, the retailer must give notice to the retailer and the distributor that there is going to be a bypass switch in relation to the consumer installation concerned.

Reports from the registry

79. Reports from the registry

The registry operator must provide to registry participants or publish, as the case may be, the following reports –

79.1 The general reports under rule 80; and

79.2 The retailer report under rule 81; and

79.3 The distributor report under rule 82; and

79.4 The meter owner report under rule 83; and

79.5 The allocation agent reports under rule 84; and

79.6 Any other report as may be agreed from time to time between the registry operator and the Co-regulatory body.

80. General reports

80.1 By 9.00 am on the sixth business day of each month, the registry operator must publish a report which states –

80.1.1 The number of ICPs (categorised by each ICP status and distributor) contained on the registry as at the last day of the previous month; and

80.1.2 The number of valid gas switching notices received by the registry operator during the previous month.

80.2 By 4.00 pm on the fifteenth business day of each month, the registry operator must publish a report which states the number of times that during the previous month, each registry participant did not comply with the timeframes specified in these rules.

81. Retailer reports

81.1 By 9.00 am on the first business day of each month, the registry operator must give each retailer a report that shows –

81.1.1 All the ICPs for which that retailer is shown in the registry as the retailer as at the last day of the previous month; and

81.1.2 For each of those ICPs, the values of all ICP parameters on that date.

81.2 By 4.00 pm on the first business day of each month, the registry operator must give each retailer a report of all the ICPs for which that retailer is shown in the registry as the retailer for any period during the previous three months.

81.3 The report under rule 81.2 must also include in respect of each ICP –

81.3.1 The start date and end date for which the retailer was responsible for the ICP, and if the retailer was responsible for the ICP more than once during the previous three months, the start dates and end dates for which the retailer was responsible for the ICP; and

81.3.2 During the period of each start date and end date pair, the codes and values for the following ICP parameters:

(a) distributor code; and

(b) Gas gate code; and

(c) Network price category code; and

(d) Loss factor code; and

(e) Meter owner code; and

(f) The ICP parameters set out in Part C of Schedule 1; and

(g) All ICP status codes and all connection status codes.

82. Distributor reports

82.1 By 9.00 am on the first business day of each month, the registry operator must give each distributor a report of showing –

82.1.1 All the ICPs for which that distributor is shown in the registry as the distributor as at the last day of the previous month; and

82.1.2 For each of those ICPs, the values of all ICP parameters on that date, and the date from which the current value of each ICP parameter was effective.

Comment [A18]: This will enable the distributor to correct their records (with correct effective date) if a notification file has not been received, or not processed correctly.

82.2 By 4.00 pm on the first business day of each month, the registry operator must give each distributor a report of all the ICPs for which that distributor is shown in the registry as the distributor for any period during the previous three months.

82.3 The report under rule 82.2 must also include in respect of each ICP –[6]

82.3.1 The start date and end date for which the distributor was responsible for the ICP; and

82.3.2 During the period of each start date and end date pair, the codes and the values for the following ICP parameters:

(a) Retailer code; and

(b) Gas gate code; and

(c) Network price category code; and

(d) Loss factor code; and

(e) All ICP status codes and all connection status codes.

83. Meter owner reports

83.1 By 9.00 am on the first business day of each month, the registry operator must give each meter owner a report of showing –

[6] This effectively gives each distributor each month a complete history of all changes made to an ICP over the entire period the distributor was responsible for the ICP. This is unnecessary.

83.1.1 All the ICPs for which that meter owner is shown in the registry as the meter owner as at the last day of the previous month; and

83.1.2 For each of those ICPs, the codes and values of all ICP parameters on that date; and

83.2 By 4.00 pm on the first business day of each month, the registry operator must give each meter owner a report of all the ICPs for which that meter owner is shown in the registry as the meter owner for some period during the previous three months.

83.3 The report under rule 83.2 must also include in respect of each ICP –[7]

83.3.1 The start date and end date for which the meter owner was responsible for the ICP; and

83.3.2 During the period of each start date and end date pair, the values for the following ICP parameters:

(a) Retailer code;

(b) The ICP parameters set out in Part C of Schedule 1; and

(c) All ICP status codes and all connection status codes.

84. Allocation agent reports

84.1 By 4.00 pm on the first business day of each month, the registry operator must give each allocation agent conducting allocations on a particular distribution system, a report for each gas gate code in relation to the retailers responsible for ICPs with that gas gate code during the previous month.

84.2 The report under rule 84.1 must include in respect of each ICP for which the retailer is responsible and had an active ICP status for some period during that month –

84.2.1 The start date and end date for which the retailer was responsible for the active ICP; and

84.2.2 The start and end date of connection for each ICP during the previous month; and

84.2.3 The loss factor code of the ICP.

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Comment [A19]: This information would allow the reconciliation agent to calculate active ICP days for each retailer for the month.

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[7] This effectively gives each meter owner each month a complete history of all changes made to an ICP over the entire period the meter owner was responsible for the ICP. This is unnecessary

Part 3

Transitional provisions

85. Treatment of switches initiated before commencement of rules

Where a switch between retailers has been initiated but not yet completed before [**insert go-live date**], the switching must be completed in accordance with the arrangements that existed on the date the switching was initiated. The Responsible Distributor, at the completion of the switch in accordance with those arrangements, will update the relevant details in Schedule A1, Part A2 so that the Responsible Retailer Code and Retailer Date Applicable are correctly recorded as at [**insert go-live date**].

Comment [A20]: This clause recognises that records retained by Distributors are effectively the Database of Record until Registry go-live date.

86. Transitional exemption

86.1 A registry participant may apply in writing to the Co-regulatory body for a transitional exemption from complying with one or more of these rules.

86.2 A transitional exemption applies for a period set out in the exemption and must set out alternative arrangements for complying with one or more rules.

86.3 In the application, the registry participant must set out in detail the reasons for the exemption, the period for which the exemption should be in effect and what alternative arrangements should apply.

86.4 If, after considering the reasons, the Co-regulatory body is satisfied that a transitional exemption should be granted, the Co-regulatory body may by notice in writing grant the transitional exemption to the registry participant which, in addition to stating the alternative arrangements that will apply, may be subject to such other conditions as the Co-regulatory body thinks fit.

87. Transitional provision for reports

Where the registry operator is required to give reports under rules 80 to 84 and the time periods to which the reports relate have not yet elapsed since those rules came into force, the registry operator must give the reports in accordance with those rules as if the applicable time periods had elapsed.

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Schedule 1

ICP Parameters maintained by one participant class

Part A1

ICP parameters maintained by Distributors on an ongoing basis

ICP Parameter	Rules governing values assigned
ICP Identifier	A unique 15-character identifier and with the format 'yyyyyyyyyyxxccc' assigned to the ICP by the distributor.
ICP Creation date	The date that the distributor deems the ICP to be created, which must be not later than the date that the gas service pipe to the ICP's consumer installation is first livened. It is the earliest date for any event relating to the ICP on the registry.
Responsible Distributor code	The applicable code of the distributor that created the ICP. Distributor codes are determined and published by the Company from time to time.
Network Pressure	The value of the nominal operating pressure, expressed numerically in kilopascals, of the gas distribution system to which the ICP's consumer installation is connected.
ICP Altitude	The altitude, expressed in metres above mean level, of the meter measuring gas consumption for the ICP's consumer installation, and for use in any required (non-dynamic) correction of the metered gas volume to standard volume.
Gas Gate Code	The code of the gas gate from which the distributor deems gas is delivered to the ICP's consumer installation. Gas gate codes are determined and published by the Company from time to time.
ICP Type Code	The code that identifies the locational relationship between the ICP and the gas gate immediately upstream of the ICP. ICP type codes are determined and published by the Company from time to time.
Load Shedding Category Code	The code that identifies the position of the ICP's consumer installation in the hierarchy for emergency shedding of gas load. Load shedding category codes are determined and published by the Company from time to time.
Maximum Hourly Quantity (MHQ)	The value of the maximum quantity of gas, in cubic metres, that the gas-consuming equipment at the consumer installation is capable of drawing per hour. The value is distinct from the capacity of the gas service pipe or metering equipment serving the consumer installation.
Retailer Code of expected retailer	The code, assigned by the distributor, of the retailer that the distributor expects to be first retailer to have responsibility for the ICP. Responsible retailer codes are determined and published by the Company from time to time.
Network Price Category Code	The code that identifies the distributor's network price category to which the ICP's consumer installation belongs.
Network Data	A value of 'ON' or 'OFF' that determines whether or not (respectively) the

Comment [A21]: What is this? The definition of ICP Type Code needs to be added to the Interpretation section

Security Flag	network price category code and the Maximum Hourly Quantity are subject to view access.
Loss Factor Code	The code that enables identification of the loss factor applicable to the ICP's consumer installation for calculation of losses on the gas distribution system to which it is directly attached. .
Network Price Details	A free-text parameter to allow the distributor to provide other information relevant to the network pricing of the ICP's consumer installation.
Physical Address	The physical address assigned by the distributor to the ICP's consumer installation, so that the ICP can be unambiguously identified with the consumer installation, in the registry.
Date applicable	Each one of the above parameters may have a number of values over the life of an ICP. In each case, when one of these values change, the distributor must record, and the Registry must retain, the date applicable for that change. The only parameters which will not change are the ICP identifier and ICP creation date.

Part A2

ICP parameters entered by Distributors for initial population of Registry

ICP Parameter	Rules governing values assigned
Responsible Retailer Code	The code of the retailer with current responsibility for the ICP, as at [**insert date, prior to go-live date**], according to records retained by the Distributor. Responsible retailer codes are determined and published by the Company from time to time.
Retailer Date applicable	The date the current retailer became responsible for the ICP, according to records retained by the Distributor.
Connection status code	The current connection status of the ICP as at [**insert date, prior to go-live date**], according to records retained by the Distributor. Connection status codes are determined and published by the Company from time to time.
Connection status date applicable	The date the connection status of the ICP was most recently changed, prior to [**insert date, prior to go-live date**].

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Part B

ICP parameters maintained by Retailers

ICP Parameter	Rules governing values assigned
Responsible Retailer Code	The code of the retailer with current responsibility for the ICP. Responsible retailer codes are determined and published by the Company from time to time. Note that the initial population of the Responsible Retailer Code, and date effective, will be from Distributor records (refer to Part A2 above)
Allocation Group Code	The code that identifies the allocation group to which the ICP's consumer installation belongs. An allocation group identifies the method used to generate an ICP's profile consumption volume information submitted to an allocation agent. Allocation group codes are determined and published by the Company from time to time.
Profile Code	The code that identifies the profile used to generate the ICP's daily time-interval volume consumption information for allocation purposes. Profile codes are determined and published by the Company from time to time.
Responsible Meter Owner Code	The code, assigned by the retailer according to the authority of a service agreement between the retailer and the meter owner concerned, of the meter owner with current responsibility for the ICP. Responsible meter owner codes are determined and published by the Company from time to time. Note that there is provision for recording only one meter owner per ICP. If there are several metering points for one ICP, and the meters are owned by different meter owners, then the retailer responsible must arrange with the distributo for the supply to be split into multiple ICPs.
Date applicable	Each one of the above parameters may have a number of values over the life of an ICP. In each case, when one of these values change, the retailer must record, and the Registry must retain, the date applicable for that change.

Part C

ICP parameters maintained by Meter Owners

ICP Parameter	Rules governing values assigned
Meter Identifier	The serial number or other unique identifier of the meter that measures volume consumption for the ICP's consumer installation, as assigned by the meter owner. However, if the consumption information is being measured by difference, the meter identifier value must be "DIFFERENCE".
Meter Location Code	The code that advises the location of any meter in relation to a consumer installation.
Standard[8] Meter	A 'Y'es or 'N'o value to indicate the use or not of a standard meter (being one that is not a prepay meter) for measurement of consumption volume for the ICP's consumer installation.

[8] There may not be more than one 'Y' value between the 'Standard meter' and 'Prepay meter' parameters, but there may be two 'N' values to signify that the Consumer Installation is unmetered.

Prepay[3] Meter	A 'Y'es or 'N'o value to indicate the use or not of a prepay meter for measurement of consumption volume for the ICP's consumer installation.
Logger Owner Code	The code of the owner of any datalogger included in the metering equipment measuring consumption volume for the ICP's consumer installation metering - whether or not the datalogger is in use at the time. Logger owner codes are determined and published by the Company from time to time.
Corrector Owner Code	The code of the owner of any corrector included in the metering equipment measuring consumption volume for the ICP's consumer installation metering - whether or not the corrector is in use at the time. Corrector owner codes are determined and published by the Company from time to time.
Telemetry Owner Code	The code of the owner of any telemetry included in the metering equipment measuring consumption volume for the ICP's consumer installation metering - whether or not the telemetry is in use at the time. Telemetry owner codes are determined and published by the Company from time to time.
Metering Price Code	The code that identifies the total metering equipment charges applicable to the full set of metering equipment currently used to measure and convey the consumption volume information for the ICP's consumer installation.
Metering Data Security Flag	A value of 'ON' or 'OFF' that determines whether or not (respectively) the metering price category code is subject to view access.
Date applicable	Each one of the above parameters may have a number of values over the life of an ICP. In each case, when one of these values change, the meter owner must record, and the Registry must retain, the date applicable for that change.

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NOTE THAT SCHEDULE 2 HAS BEEN REWRITTEN TO REFLECT THE INTENTION THAT THE GAS REGISTRY SHOULD BE THE DATABASE OF RECORD FOR LOGGING CONNECTION STATUS EVENTS.

THE REWRITING OF SCHEDULE 2 HAS REMOVED THE NEED FOR THE STATUS CHANGE RULES PREVIOUSLY DOCUMENTED IN SCHEDULE 3.

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ICP Status Codes and Connection Status Codes¶
(ICP Parameters maintained by Distributors and Retailers)¶
¶
Part A¶
¶
Codes used by the distributor prior to connection commissioning¶
ICP Status code ... [1]

Schedule 2

ICP Connection Status
(ICP Parameters maintained by Distributors, Retailers, and / or Meter Owners in accordance with Rule 54)

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Part A
Connection Status

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The five connection status codes are:

Connection Status Code	Description
PRE	***Pre-livening. Gas is NOT able to flow to the Consumer Installation***. This status code is assigned if a new ICP is created on the Registry prior to first livening. This status code is NOT to be used if gas is able to flow to the Consumer installation at the time the new ICP is created.
GAS	***Gas is able to flow to the Consumer Installation***. This status code must be assigned to every live installation. This INCLUDES those where gas is already flowing at the time the ICP is first created.
DIS	***Disconnected. Gas is NOT able to flow to the Consumer Installation***. This status code must always be accompanied by a 'HOW' code to describe the means by which gas flow is prevented from flowing to the Consumer Installation.
GDE	***Decommissioned – removed***. The service pipe has been physically disconnected from the gas network, metering equipment has been removed, and the service has been abandoned with the intention that supply will never be re-livened. This code is also applicable to the obsolete connections(s) resulting from the physical amalgamation of two or more connections.
GNA	***Decommissioned – administrative***. ICP not applicable. Recognises that an ICP should never have been created, because there is not and has never been a physical gas supply to the property. Code GNA is to be used when an ICP was originally created in error, or when a prospective gas consumer cancels their service request before physical connection takes place.

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Part B
HOW codes

When a Distributor, Retailer, and/or Meter Owner records that an ICP has been disconnected they must record the method of disconnection by using a HOW code

HOW code	Description
SVT	Disconnected - service valve turned off. Metering equipment remains.
SVL	Disconnected - service valve turned off & locked. Metering equipment remains.
SUC	Disconnected - supply capped. Metering equipment remains.
SMR	Disconnected - supply capped. Metering equipment removed.
SDM	Disconnected - service disconnected at main.

Note: Additional HOW codes may be determined and published by the Gas Industry Company from time-to-time, after appropriate consultation with industry participants. HOW codes must reflect current industry-agreed disconnection and reconnection protocols.

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Deleted: Applies when the service pipe of a permanently disconnected supply has been physically disconnected from the gas network - with the intention that supply will never be re-livened. This code is applicable to the obsolete connection(s) resulting from the physical amalgamation of two or more connections.

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Applies to an ICP that has been retired for administrative reasons such as being created in error. There is no physical change to any gas connection.

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Part C
WHY codes

When a Distributor, Retailer, and/or Meter Owner records that an ICP has been disconnected they must record the reason for disconnection by using a WHY code

WHY code	Description
CRD	Credit disconnect. Gas supply has been disconnected because of alleged consumer non-compliance with contracted credit terms.
VAC	Vacant disconnect. Gas supply has been disconnected because the previous consumer has moved out of the premises, and there is currently no contract in place between the retailer and a consumer.
TEM	Gas *currently* not required. The consumer has advised that they do not require a gas supply for a period of time (may be on a seasonal basis).
PER	Gas *no longer* required. The consumer has requested, and the property owner agreed, that the gas supply should be permanently disconnected. Usually the next step prior to decommissioning.
SAF	Gas safety disconnect.
MTC	Gas maintenance disconnect.
AUD	The fact that gas supply has been disconnected has been discovered during a site audit. The reason for the disconnection may be unknown or disputed.

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Note: Additional WHY codes may be determined and published by the Gas Industry Company from time-to-time, after appropriate consultation with industry participants. WHY codes must reflect current industry-agreed disconnection and reconnection protocols.

Part D
WHEN

When a Distributor, Retailer, and/or Meter Owner records that an ICP connection status has been changed, as a result of field work managed by that Distributor, Retailer, or Meter Owner then the party responsible for the field work must record on the registry the date and time that the connection, disconnection, reconnection, or decommissioning was completed by the field staff.

When a Distributor, Retailer, and/or Meter Owner records that an ICP connection status has been changed, as a result of information gained from a site audit managed by that Distributor, Retailer, or Meter Owner then the party responsible for the site audit must record on the registry the date and time of the site visit.

Part E
WHO

When a Distributor, Retailer, and/or Meter Owner records that an ICP connection status has been changed, as a result of field work managed by that Distributor, Retailer, or Meter Owner; or as a result of information gained from a site audit managed by that Distributor, Retailer, or Meter Owner; then the party responsible for updating the Registry must record on the Registry sufficient details to cross-reference the information provided back to records maintained by the Distributor, Retailer, or Meter Owner and / or their field service contractors.

Schedule 2

ICP Status Codes and Connection Status Codes (ICP Parameters maintained by Distributors and Retailers)

Part A

Codes used by the distributor prior to connection commissioning

ICP Status code	Description	Connection Status Code	Description
NEW	Assigned during the new connection process until the gas connection is certified and all ICP network parameter data are populated.	PRE	Pre-livening. Gas not able to flow to the Consumer Installation.
READY	Assigned once all the ICP network parameter data are populated, but the service is not physically livened and no retailer has taken responsibility.	PRE	Pre-livening. Gas not able to flow to the consumer installation.

Part B

Codes used by the distributor at connection de-commissioning

ICP Status code	Description	Connection Status Code	Description
DECR	Decommissioned – Removed. Applies when the service pipe of a permanently disconnected supply has been physically disconnected from the gas network - with the intention that supply will never be re-livened. This code is applicable to the obsolete connection(s) resulting from the physical amalgamation of two or more connections.	GDE	The distributor's follow up of the permanent disconnection authorised by the retailer. The gas connection has the meter removed and service disconnected from gas network and abandoned.
DECA	Decommissioned– Administrative. Applies to an ICP that has been retired for administrative reasons such as being created in error. There is no physical change to any gas connection.	GNA	Not applicable meaning that no physical connection exists.

Part C

ICP status codes and connection status codes maintained by retailer

ICP Status code	Description	Connection Status Code	Description
ACTC	Active – Contracted. Applies once the gas service is certified and a retailer has taken responsibility for supply and the ICP on the registry. Then either: The gas connection is livened (service valve turned on) and a contracted customer is taking supply; or The previously livened gas connection to a contracted customer has been 'de-livened' by turning the service valve off, for reason of a temporary disconnection that does not impact on service charges.	GAS	Gas is able to flow to the Consumer Installation.
		GCT	Gas credit disconnect – metering equipment remains, service valve turned off.
		GCC	Gas credit disconnect – metering equipment remains, supply capped.
		GCM	Gas credit disconnect – metering equipment removed, supply capped.
		GCL	Gas credits disconnect – metering equipment remains, supply turned off & locked.
ACTV	Active – Vacant. Applies when the consumer installation is certificated and livened (service valve turned on), but no contracted customer is taking supply.	GAS	Gas is able to flow to the consumer installation.
INACT	Inactive – Transitional. Applies when either a certified new gas connection has been uplifted by a retailer but not yet livened, or a previously livened supply is disconnected by some readily-reversible means and is likely to be re-livened in the future. Some examples of such transitional disconnections are: Disconnection for significant modifications to the consumer installation; Disconnection to suspend the gas service without removal of the metering equipment and/or service riser from the site;	GVT	Gas vacant disconnect – metering equipment remains, service valve turned off.
		GVC	Gas vacant disconnect – metering equipment remains, supply capped.
		GVL	Gases vacant disconnect – metering equipment remains, service valve turned off & locked.
		GVT	Gas currently not required disconnect – metering equipment remains, service valve turned off.
		GNC	Gas currently not required

	Disconnection when a property has become vacant; Disconnection when there are concerns about the safety of the consumer installation.		disconnect – metering equipment remains, supply capped.
		GST	Gas safety disconnect – metering equipment remains, service valve turned off.
		GSC	Gas safety disconnect – metering equipment remains, supply capped.
		GSL	Gas safety disconnect – metering equipment remains, service valve turned off & locked.
INACP	Inactive – Permanent. Applies when the gas supply has a permanent disconnection – meaning that there is isolation of the consumer installation from the gas distribution system by means of removal of the metering equipment and service riser from the site.	GMM	Gas maintenance disconnect – service disconnected at main.
		GSM	Gas safety disconnect – service disconnected at main.
		GPC	Gas permanent disconnect ready for GMS removal - metering equipment remains, supply capped.
		GPM	Gas permanent disconnect ready for decommissioning - metering equipment removed, supply capped.
INACR	Inactive – Replaced. Applies when the ICP has been replaced as the representative of a gas load – typically occurs when a consumer installation (consisting of multiple gas installations) is replaced by an embedded network.	GAS	Gas is able to flow to the consumer installation(s).

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Schedule 3

Table of Gas ICP Status Rules

Transition	Available to	Use criteria and comments
To New	Distributor	At creation of the ICP before all ICP network parameter values are populated.
From New **to** Ready	Distributor	Changed when gas supply is certified and all ICP network parameter values are populated.

From Ready **to** New	Distributor	Can be reset to New if Distributor identifies an error in the data or that the gas service is not ready for livening.
From New or Ready **to** Decommissioned Administrative	Distributor	Used when an ICP identifier created in error.
From Decommissioned Administrative **to** New or Ready	Distributor	Used only to reverse the previous change. Not available if the ICP Status has been other than NEW, READY or DECA.
From Ready **to** Active Contracted (ACTC)	Retailer	Changed when first retailer takes responsibility for the ICP, gas is able to flow to the consumer installation and there is a contract with a consumer.
From Ready **to** Active Vacant (ACTV)	Retailer	Changed when first Retailer takes responsibility for the ICP, gas is able to flow to the consumer installation but there is no contract with a consumer.
From Ready **to** Inactive Transitional (INACT)	Retailer	May be used when the first retailer takes responsibility for the ICP, but gas is not able to flow to the consumer installation and there is no contract with a consumer.
From Active (ACTC or ACTV) or Inactive Transitional **to** Ready	Retailer	Used only to correct an error in the initial assignment of the ICP, and not once any subsequent event has been recorded for the ICP.
From Active (ACTC or ACTV) **to** Inactive Transitional (INACT)	Retailer	Used when a physical disconnection has been performed as a transitional action such as may occur when the consumer installation has no consumer.
From Active (ACTC or ACTV) **to** Inactive Permanent (INACP)	Retailer	Used when a physical disconnection has been performed a permanent change that makes the gas connection and ICP available for decommissioning.

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Transition	Available to	Use criteria and comments
From Active (ACTC or ACTV) **to** Inactive Replaced (INACR)	Retailer	Used when an ICP has been replaced as the representative of a consumer installation in the allocation and reconciliation processes.
From Inactive Replaced **to** Active (ACTC or ACTV)	Retailer	Used as a reversal of a move to INACR, when the ICP resumes its role as representative of a consumer installation.
From Inactive (INACT or INACP) **to** Active (ACTC or ACTV)	Retailer	Used when a there is a physical reconnection of a consumer installation to the gas network such that the gas is able to flow to the installation.

From Inactive Transitional **to** Inactive Permanent	Retailer	Used to record the move from what was originally considered a short term disconnection to one that may lead to decommissioning.
From Inactive Permanent **to** Decommissioned Removed	Distributor	Used when the gas service decommissioning process for the ICP is complete.
From Decommissioned Removed **to** Inactive Permanent	Distributor	Used either to correct an error in the earlier change of status (where a reported decommissioning was not completed) or as the first stage of a re-commissioning where supply of gas is resumed through the same gas connection and to the same consumer installation that was previously decommissioned.
From Inactive Replaced **to** Decommissioned Administrative	Distributor	Used when it is considered that the ICP replaced by others in the allocation and reconciliation processes will never be used again.
From Decommissioned Administrative **to** Inactive Replaced or Inactive Permanent	Distributor	Used only for correcting an error in an earlier change of status.

Benefits derived from new switching arrangements

These calculations assume that the design and implementation of the Registry is sufficiently robust to warrant it to be treated as the "database of record", particularly as a true and complete record of all connection, disconnection, reconnection, and decommissioning events over the lifetime of each ICP.

If the Registry passes this test, then distributors share in certain benefits, principally by avoiding the need for duplication of record keeping.
This table assumes that the Registry design and implementation passes the "database of record" test.

	Low	High	Median	Retailer share	Distributor share	Total	Retailer benefit	Distributor benefit	Median
Static benefits	$272,000	$282,000	$277,000	80%	20%	100%	$221,600	$55,400	$277,000
Audit savings	$120,000	$240,000	$180,000	50%	50%	100%	$90,000	$90,000	$180,000
Dynamic efficiency benefits	$205,655	$1,233,929	$719,792	90%	10%	100%	$647,813	$71,979	$719,792
Total	$597,655	$1,755,929	$1,176,792				$959,413	$217,379	$1,176,792
Proportion of benefit derived by each party							82%	18%	100%

DISTRIBUTOR BENEFITS TREND TOWARDS ZERO IF PARALLEL RECORDING SYSTEMS ARE REQUIRED TO MAINTAIN RECORDS OF ICP EVENTS