

**Response to the Gas Industry Company  
consultation on the Statement of proposal for  
proposed Gas Registry amendments**

From

**Contact Energy Limited**

**18 September 2014**

**Contact Energy Limited**

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Contact Energy welcomes the opportunity to respond to the Gas industry company's consultation paper. Contact's response follows over the page.

For any questions related to this submission, please contact the following:

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QUESTION		COMMENT
Q1:	<i>Do you agree with the definitions proposed for the three core metering fields? If not, please explain why and supply alternate definitions.</i>	<p>No.</p> <p>The definition of meter pressure should be simplified. The second sentence is not relevant to the definition (despite it being included in the NZS 5259 definition for information only). The following is suggested.</p> <p>“Meter pressure means the gauge pressure on which volumetric measurement is based, expressed in kPa.”</p>
Q2:	<i>Do you agree with the addition of these three fields to the registry?</i>	Yes
Q3:	<i>Do you agree with the definitions proposed for TOU meter and advanced meter? If not, please explain why and supply an alternate definition.</i>	<p>No.</p> <p>There is a problem with both definitions, the context being that the proposed definition of Advanced meter is all that is required for a TOU site, while also noting that Vector/AMS uses dataloggers (not correctors) as devices to record hourly and/or daily quantities at “TOU” sites which are required to have TOU metering (&gt; 10TJ). The dataloggers may or may not be programmed for one or more gas factors (e.g. a fixed pressure factor).</p> <p>Furthermore, there is no difference between a meter used at a site which requires TOU metering and submission of daily consumption data (&gt;10TJ) and a site which does not require TOU metering and submission of daily consumption data (&lt;10TJ), the only difference is the device used to record metered volume – one where it is capable of recording hourly and/or daily reads and/or volumes and the other which typically has an accumulating register only.</p> <p>TOU meter is already defined correctly in the reconciliation rules, so there is no need to repeat the definition in the switching rules, or indeed to modify the definition except to differentiate from the Advanced meter definition.</p> <p>It appears we are trying to differentiate between larger sites (TOU meter, submission type daily consumption, allocation group 1-2) and mass</p>

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	<p><i>market sites (Advanced meter, submission type monthly consumption, allocation group 3-6).</i></p> <p><i>Whether the metering equipment includes a corrector (dynamic correction for one or more factors) or telemetry is irrelevant to “TOU”, unless of course the Gas Industry Co wants to regulate that a TOU meter must include a corrector (which would then mean replacement of data loggers with correctors for a lot of TOU sites &gt; 10T).</i></p> <p><i>In future there would appear to be no reason to prevent a retailer submitting daily consumption from an Advanced meter, in which case it would logically have to be treated as for allocation groups 1-2. This is consistent with the electricity Code where the retailer can choose to submit AMI data as NHH or HHR for settlement purposes.</i></p> <p><i>So given all the above it is suggested that the following definitions could work (and assumes the GIC does not wish to regulate correctors for &gt; 10T) sites):</i></p> <p><i>“TOU meter means a meter which has an associated datalogger to allow register readings or gas consumption to be recorded automatically at predetermined intervals, which may or may not include a corrector, and for which daily gas consumption is required to be submitted for allocation purposes.”</i></p> <p><i>“Advanced meter means a meter which has an associated datalogger to allow register readings or gas consumption to be recorded automatically at predetermined intervals, for which daily gas consumption is not required to be submitted for allocation purposes.”</i></p>

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QUESTION	COMMENT
<p>Q4: Do you agree with the proposal to add the TOU flag, but not to add the other metering fields, or change the number of location codes in use?</p>	<p>No</p> <p>Contact Energy believes that the inclusion of the TOU flag will be misleading to users and there is a risk of incorrect population where a site has an interval logger that applies fixed factor correction to measured gas volumes. In this instance no dynamic correction is performed and attributes such as meter pressure need to be validated whenever a switch occurs.</p> <p>Contact Energy proposes an alternative to the inclusion of this TOU flag with the addition of Register Contact Code (RCC) as part of the meter event. This field is an existing switch attribute which is known and understood by the industry.</p> <p>ICPs will only have a single RCC value at any point of time so the effort to populate this attribute onto the registry by meter owners is expected to be similar to the proposal to populate the TOU flag. The population of ICPs that will require a RCC values other than U(uncorrected) is around 600 across all meter owners. Given this small population, maintenance of this attribute on the registry should not be an onerous task.</p> <p>This field will ensure that the retailer clearly knows what if any physical or dynamic correction of gas volumes is being performed on site and additionally the registry can also perform appropriate validation of switch files based on this field value.</p> <p>Additionally where a change of correction methodology occurs at an ICP, there is an opportunity outside the transfer of a meter docket between meter owner and retailer to identify the need to also adjust billing and settlement calculations by way of a registry notification.</p> <p>Contact Energy agrees with the proposal not to add the other metering fields or change the number of location codes in use.</p>



QUESTION		COMMENT
Q5:	<i>Do you agree that the proposed distributor fields do not add sufficient value to warrant addition to the Registry?</i>	Yes
Q6:	<i>Given the extent of the changes required to retailers' systems, do you agree that a file versioning mechanism should be implemented? If so, do you support participant level versioning or individual report level versioning?</i>	<p>Yes</p> <p>Contact considers the file versioning option to be a good idea and would support this if other participants are also interested in sharing any costs associated with this registry enhancement.</p> <p>Contact believes this will reduce implementation costs significantly across all gas registry participants (assuming the majority of gas registry participants automatically interface with the Gas registry). Contact would be in favour of implementing participant level versioning as we would expect the individual report level versioning functionality would increase complexity and resulting development costs.</p> <p>Contact recommends that the industry still has a mechanism for participants to be able to request a full list of registry fields for reconciliation/data accuracy purposes given that a number of participants are expected to support the file versioning functionality.</p> <p>Contact would also recommend that the file versioning included the registry web service functionality, however appreciates this could add further complexity and cost. If this cannot be included with minimal development effort, Contact would recommend assessing how this could be implemented via an alternative method in order to avoid upsetting existing systems that use web services. I.e. Adding tags to the end of the WSDL or structuring differently.</p>

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Q7:	<i>Do you agree with the introduction of audit provisions to the Rules? Do you have any comments on the audit principles or proposed rule drafting?</i>	<p><i>Yes, but we do have an in principle issue with rule 92.2.3.</i></p> <p><i>Any registry participant may indicate they have “an interest” in any other registry participant’s draft or final audit report, but that does not mean the other registry participant should be provided with the draft or final audit report.</i></p> <p><i>Contact considers the only information that other industry participants should have access to (on the GIC’s website) is a summary table setting out the compliance status of the rules audited, as an extract from the final audit report only.</i></p> <p><i>Failing that, the “an interest in the report” needs to be qualified by the additional words “due to findings in the report having a material impact on that registry participant”.</i></p> <p><i>The context for this suggested amendment is the E-Gas performance audit which identified under-reporting had a material impact on other reconciliation participants and therefore was one audit report that should have been socialised with other participants to seek comments before it was finalised.</i></p>
Q8:	<i>Do you agree with the introduction of a validation check on the content of the Gas Transfer Notice? Do you agree that this validation should not be applied for ICPs with TOU meters?</i>	Yes
Q9:	<i>Do you agree with the reduction of the allowed switch timeframe from 23 business days to 10 business days?</i>	Yes
Q10:	<i>Do you agree with the amended wording of rule 61.1.1, to accommodate switches where contracts have been entered into significantly in advance of the supply commencement date?</i>	Yes
Q11:	<i>Do you agree that a meter owner should have the ability to populate an ICP’s metering parameters, and the responsible meter owner field, before retailer uplift of an ICP?</i>	Yes

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QUESTION		COMMENT
Q12:	<i>Do you agree that ICP parameters should be able to be edited by their respective owners during a switch? Are there any ICP parameters that should remain restricted?</i>	Yes Contact cannot see any particular gas registry fields that should be locked during the switching process.
Q13:	<i>Do you agree that a connection status for temporary disconnections, as provided for in Rule 59, should be added to the Registry?</i>	Contact is comfortable with the addition of a status code so long as it is not a code used in the GANZ disconnection and reconnection protocol GIP001 to reflect credit disconnections (GCT, GCL, GCC, GCU, GCM) as there are other temporary disconnections (e.g. emergency/safety, request of consumer). We recommend a code of GTD (gas temporary disconnection) which is not used in the protocol.  It is also noted that while this is a retailer maintained registry field mid ICP lifecycle, emergency/safety temporary disconnections can be initiated by the distributor without the retailer being in the loop until after the disconnection is physically carried out. It is also noted that Contact considers the specific safety and maintenance disconnection codes to be more useful and descriptive and the new temporary disconnection code is only used in cases outside of this.
Q14:	<i>Do you support the development and implementation of a gas data hub?</i>	Yes
Q15:	<i>Do you have any other comments on enhancements to the Registry interfaces or other information exchange mechanisms?</i>	No
Q16:	<i>Do you support the proposed minor changes?</i>	Yes

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