



11 Chews Lane
PO Box 10568
The Terrace
Wellington 6143
New Zealand

Genesis Energy Limited

Fax: 04 495 6363

22 September 2014

FAO Tim Herbert
Gas Industry Company Limited
Level 8, Todd Building
95 Customhouse Quay
WELLINGTON 6143

By email: tim.herbert@gasindustry.co.nz

Dear Tim,

Proposal Gas Registry Amendments (12 August 2014)

Genesis Energy Limited welcomes the opportunity to provide feedback to the Gas Industry Company Limited ("GIC") on proposed gas registry amendments.

We generally agree that the proposed amendments will be an improvement and support the purpose of the Registry. Our more specific comments to the questions set out in the "Statement of Proposal: Gas Registry Amendments 12 August 2014" are set out below.

Questions 1 and 2: "Do you agree with the definitions for the three core metering fields? If not, please explain why and supply alternate definitions. Do you agree with the addition of these three fields to the registry?"

We agree with proposed definitions and the addition of these fields to the Registry.

Questions 3 and 4: "Do you agree with the definitions for TOU meter and advanced meter? If not, please explain why and supply an alternative definition. 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?"

We agree with the definitions and the proposal to add the TOU flag.

Question 5: "Do you agree that the proposed distributor fields do not add sufficient value to warrant addition to the Registry?"

We agree.

Question 6: “Given the extent of the changes required to retailers’ systems do you agree that a file versioning mechanism should be implemented? If so, do you support participant level versioning or individual report level versioning?”

We agree that a file versioning mechanism should be implemented as this will allow more flexibility when retailers change their systems to accept new data fields.

In regard to versioning, we strongly support the need to have the secondary level of request of file version. Our main driver for wanting this ability is that while we will change our system to immediately accept the new version of files, until we do, we will want to obtain the new data that is available via batch files for the purposes of validation and updates testing etc.

In the event there is insufficient support from retailers for the secondary level versioning, Genesis Energy would like to discuss options directly with GIC.

Question 7: “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?”

We agree with the introduction of audit provisions.

Question 8: “Do you agree with the introduction of a validation check on the content of the Gas Transfer Notice? Do you agree that this validation should not be applied for ICPs with TOU meters?”

In principle, we agree with the introduction of a validation check. However, we suggest there is a transition period of six months to allow retailers sufficient time to update their systems, align, and correct their data to avoid any disruptions.

We agree that validation should not be applied for ICPs with TOU meters.

Question 9: “Do you agree with the reduction of the allowed switch timeframe from 23 business days to 10 business days?”

We agree with the proposed reduction. The alignment with electricity time frames creates a more harmonious experience for dual fuel customers.

Question 10: “Do you agree with the amended wording of rule 61.1.1, to accommodate switches where contracts have been entered into significantly in advance of the supply commencement date?”

We agree that transfer switches should have retrospective effect, but we do not consider the proposed wording properly achieves this objective.

The amendment to rule 72.5 refers to compliance with rule 67.3. Rule 67.3 still prohibits requested switch dates that pre-date the date that the request to the Registry was made.

To deal with this anomaly, we propose an amendment to rule 67.3:

67.3 If the new retailer includes a requested switch date for a standard switch, that date –

67.3.1 Must not be more than 10 business days after the date of the gas switching notice is given to the registry.

67.3.2 May pre-date the date the gas switching notice is given to the registry, provided either -

(a) the requested switch date does not pre-date the first day of the calendar month in which the gas switching notice is given to the registry; or

(b) the requested switch date pre-dates the first day of the calendar month in which the gas switching notice is given to the registry, in which case the responsible retailer is only bound to the requested switch date if they agree.

Additionally, the words “...*more than 12 business days*...” in the proposed additional clause 66.1.1 are not necessary. Clause 66.1.1 refers explicitly to rule 67.3 and 67.3A, which specify the switch date in relation to the date the gas switching notice is sent to the registry with the upper bound of 10 business days from that date. Accordingly, by default, the new retailer cannot send a gas switching notice any more than 10 business days prior to the supply commencement date, irrespective of how many days in advance the agreement is entered into.

To reflect this issue, we suggest that Clause 66.1.1 be amended as follows:

Where a contract to supply gas is entered into ~~more than 12 business days~~ in advance of the supply commencement date, the new retailer must initiate the switch

by giving a gas switching notice to the registry as soon as practicable so as to comply with rule 67.3 or 67.3A, as appropriate.

Question 11: “Do you agree that a meter owner should have the ability to populate an ICP’s metering parameters, and the responsible meter owner field, before retailer uplift of an ICP?”

We agree.

Question 12: “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?”

We agree. We are not aware of any ICP parameters that should remain restricted.

Question 13: “Do you agree that a connection status for temporary disconnections, as provided for in Rule 59, should be added to the Registry?”

We agree in principle. However, the benefit to meter owners will be limited due to the time frame of retailers advising the Registry of a status change and the Registry passing this on to other participants. Further, the proposal will require technical changes to retailers’ billing systems which will need similar timeframes as meter field changes to implement.

Questions 14 and 15: “Do you support the development and implementation of a gas data hub? Do you have any other comments on enhancements to the Registry interfaces or other information exchange mechanisms?”

We support the development and implementation of a gas data hub. However, the benefits for dual fuel retailers will be limited as processes for each fuel type are separate and discrete.

We do not have any other comments.

Question 16: “Do you support the proposed minor changes?”

Yes.

If you would like to discuss any of these matters further, please contact me on 04 830 0013.

Yours sincerely



Rebekah Plachecki
Advisor Regulatory Affairs