



21 September 2026

Andrew Walker
Principal Adviser
Gas Industry Company Limited

Dear Andrew,

Re: Draft Switching Determinations September 2026

Greymouth Gas New Zealand Limited ("Greymouth") has three comments on this draft.

1. The participant table should use Responsible Retailer, rather than "Retailer".

GIC has confirmed that the table reflects the Participant Register and is not an assessment of retailer status under either the Switching Rules or the CCM Regulations. The registry records the Responsible Retailer for each ICP and does not contain a separate 'Retailer' parameter.

Rule 44.1.1 requires GIC to determine and publish participant codes required as values for relevant ICP parameters on the registry. The determination should identify the registry role to which the code relates, namely Responsible Retailer.

Using the unqualified descriptor 'Retailer' risks being mistaken for a determination of wider legal retailer status. The CCO's initial reliance on this table to identify CCM retailers in the CCM Information Guide demonstrates that this risk is real.

2. Load-shedding category is at ICP level, not for multi-ICPs at a site

The Switching Rules and registry operate at the ICP level. The amended CCM Regulations determine curtailment bands by reference to a different concept of consumer installation which may comprise multiple connection points at a site. As a result, the CCM curtailment band is not necessarily the same thing as the ICP-level load-shedding category recorded on the registry. The registry should continue to record the load-shedding category required under the Switching Rules, but that category should not be assumed to represent the separate CCM assessment.

3. The determination should provide for registry states that are not presently catered for

The present codes and valid combinations do not appear to accommodate all states an ICP or connection may reasonably enter under the Switching Rules. Examples include:

- an ICP that satisfies the criteria for *ICP* decommissioning, but where the service line remains physically present, isolated and unavailable for use; and

- an ICP where there is no consumer, consumer installation or supply contract, the meter has been removed, but the network connection has not been capped or otherwise physically disconnected and gas may remain capable of flowing.

Greymouth requests that GIC use the present determination process to review whether the existing ICP status codes, connection-status codes and valid combinations properly cater for those states and, if not, to determine any additional codes or valid combinations required.

The current determination appears to permit only one valid connection-status pairing for an ICP status of DECR, namely GDE ("service disconnected from network outside property and service abandoned"). As a result, ICP decommissioning and network decommissioning have become incorrectly functionally linked even though they are distinct concepts under the registry framework. Rule 59.11 provides for ICP decommissioning by reference to switching / reconciliation status and whether the associated consumer installation remains connected. The current determination architecture appears to add a further requirement that the service line itself be abandoned before DECR can be used for ICPs, notwithstanding that rule 59.11 addresses ICP decommissioning by reference to switching/reconciliation status and whether the consumer installation remains connected (not whether the network is decommissioned).

This has practical risk. The current framework appears capable of allowing distributors to argue that a consumer, retailer or property owner should fund network abandonment works to the property boundary solely to achieve an ICP status outcome. Greymouth is unaware of any published analysis explaining why ICP decommissioning should depend upon partial network decommissioning (particularly when that network is otherwise safe and isolated).

The consultation material explains that, in addition to updating load-shedding categories, GIC is taking the opportunity to update participant codes and gas-gate codes. Greymouth agrees with that approach. The issues identified above relate to the same rule 44 framework and concern plausible states that arise under the Switching Rules. The present review appears to be an appropriate opportunity to make further changes as identified above.

Rule 44 expressly requires GIC to determine and publish ICP status codes, connection-status codes and the valid combinations of those codes. If GIC considers that the required states can be implemented through registry specifications, operational coding changes or another instrument without amendment to the published determination, Greymouth requests that GIC identify the applicable instrument; the process by which participants may propose new registry states, codes or valid combinations; the person responsible for approving and implementing those changes; and the anticipated process for subsequently updating the published determination to reflect those changes.

Conclusion

Greymouth requests that GIC publish the submissions received, its responses and supporting analysis, any changes made following consultation, and the final determination with reasons.

Yours sincerely

Chris Boxall

Chris Boxall
Commercial Manager