

29 September 2025

Gas Industry Co.

Nova Energy Limited
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By email: consultations@gasindustry.co.nz

Consumer Care Guidelines consultation

Nova Energy (Nova) thanks the Gas Industry Co (GIC) for the opportunity to provide feedback to this consultation. Nova also appreciates the GIC's efforts to align the Gas Consumer Care Guidelines (guidelines) with those of the electricity sector, to better support and protect consumers while also valuing efficiency.

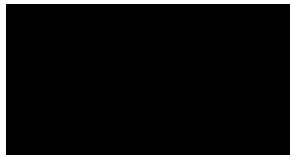
Nova values and supports a regulatory framework that is consistent and effective across the gas and electricity markets wherever feasible.

In answer to the GIC questions, Nova agrees with the proposed content and structure of the guidelines and commends the GIC for maintaining the voluntary nature of these guidelines while strengthening them.

In allowing the GIC discretion when assessing alignment with the guidelines based on the size and resources of retailers, Nova supports the underlying principle of proportionality. However, it is essential that the GIC's discretion is used transparently, equitably and in a way that maintains consumer protections and industry confidence. One suggestion is that the GIC could consider publishing anonymised summaries of when and why discretion was exercised, and/or establish certain definitions or thresholds (i.e., what the GIC sees as a small retailer) which could guide the GIC's rationale when exercising such discretion.

Thank you again for the opportunity to provide feedback.

Yours sincerely



Tamiris Robinson

Regulatory Advisor