# Appendix A: Submissions Template

Submission prepared by: (company name and contact)

| QUESTION | | COMMENT |
| --- | --- | --- |
| Q1 | Do you have any comments on the high-level process described in this section? |  |
| Q2 | Do you have any comment regarding the insolvency trigger? |  |
| Q3 | Should the obligation to report a retailer insolvency be placed on retailers only, to report their own insolvencies, or should gas producers, gas wholesalers, and the allocation agent also have reporting responsibilities (as proposed above)? |  |
| Q4 | Do you agree that these changes to the Switching Rules would be minor and would not adversely affect the interest of any person in a substantial way? |  |
| Q5 | Do you agree that the Switching Rules be amended to include the ability for Gas Industry Co to require information from an insolvent retailer? |  |
| Q6 | Do you agree with the proposed content of the report(s)? Are there items that should be added or deleted, and why? |  |
| Q7 | Do you agree that these changes are minor and would not adversely affect the interest of any person in a substantial way? |  |
| Q8 | Further, it is likely that the cost of monitoring would be offset by the savings gained from finding any instances of gas consumption at the monitored ICPs, which can then be prevented through disconnection or used to identify potential new customers. In other words, without the proposed change, any UFG caused by vacant and inactive ICPs of the insolvent retailer will be allocated to remaining retailers at the affected gas gate in proportion to their customer load. With the proposed change, gas consumption at those ICPs will be identified and prevented, providing a benefit to all retailers at the gate at the expense of minor monitoring costs. Accordingly, Gas Industry Co concludes that this changes does not adversely affect retailers in a substantial way. Do you agree with the proposed amendments to the Switching Rules? |  |
| Q9 | Do you agree that the proposed change is minor and does not adversely affect the interests of any person in a substantial way? If not, please describe the substantial adverse effect. |  |
| Q10 | Do you agree with the proposed trigger? |  |
| Q11 | Do you agree with the proposed approach of transferring orphan consumers on an ICP-by-ICP basis? If not, what alternative would you suggest that takes into account the need to transfer customers quickly and the limited resources at Gas Industry Co’s disposal? |  |
| Q12 | Should a de minimus threshold (of eg 5% or 10%) apply to recipient retailers? If yes, do you agree with the proposed separate approaches to allocation group 1-3 and allocation group 4-6 customers? |  |
| Q13 | If not, do you prefer the option where all retailers are included, but those with less than 5% market share (by customers and volume)) can opt out? |  |
| Q14 | Do you have any views on the proposed ICP allocation methodology? |  |
| Q15 | Do you agree with this approach? Why or why not? |  |
| Q16 | Do you agree that this is a reasonable approach to the transfer of large consumers? If not, what alternative would you suggest? |  |
| Q17 | Do you have any comments on clauses 8-11 of the proposed Drafting Instructions? |  |
| Q18 | Do you have any comments on clause 12 in the proposed drafting instructions? |  |
| Q19 | Do you agree with the proposal in clause 13 of the proposed drafting instructions? |  |
| Q20 | Do you agree with this proposal? Why or why not? |  |
| Q21 | Do you agree that the change is minor and will not adversely affect the interest of any person in a substantial way? |  |