



Vector Limited
101 Carlton Gore Road
PO Box 99882, Newmarket
Auckland 1149,
New Zealand
www.vector.co.nz
Corporate Telephone
+64-9-978 7788
Corporate Facsimile
+64-9-978 7799

Electricity Authority
PO Box 10041
Wellington 6143

Sent by email to: submissions@ea.govt.nz

21 May 2012

Submission on proposed changes to Registry ICP switching process

1. Vector welcomes the opportunity to respond to the Electricity Authority's ("Authority") consultation paper entitled *Proposed changes to Registry ICP switching process*, dated 14 May 2012.
2. Vector's contact person for this submission is:
Ian Ferguson
Regulatory Advisor
DDI: 09 978 8277
Email: ian.ferguson@vector.co.nz
3. The Authority has previously suggested a three-week switching moratorium to allow for changes to be made to implement the new Part 10 Code requirements. Vector strongly agrees with the Authority's revised view that a three-week switching moratorium would be too long. Distributors bill the retailer that is recorded as "holding" the ICP on the Registry for lines function services. Therefore a switching moratorium would create billing difficulties for the industry. We support as short a switching moratorium as is possible and consider that the proposed 2-3 days is reasonable.
4. Vector also supports the proposal that the moratorium will occur over 4-6 May 2013. If the moratorium occurs at this time it would minimise the impact on Vector's billing processes.

Yours sincerely,

A handwritten signature in blue ink that reads "Bruce Girdwood".

Bruce Girdwood
Manager Regulatory Affairs