12 December 2014



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Andrew Walker Senior Adviser Gas Industry Company PO Box 10-646 Wellington 6011

Dear Andrew

Submission on the Proposed Compliance Thresholds

Introduction

- 1. Vector Limited ("Vector") welcomes the opportunity to make this submission on the Gas Industry Company's ("GIC") Consultation on Compliance Thresholds, dated 12 November 2014.
- 2. Vector supports the GIC's proposed compliance thresholds. We agree these thresholds would significantly reduce compliance costs on industry participants, and ultimately consumers, without adverse impact on other industry participants and the market.
- 3. No part of this submission is confidential and we are happy for it to be made publicly available.
- 4. Vector's contact person for this submission is:

Luz Rose Senior Regulatory Analyst Luz.Rose@vector.co.nz (04) 803 9051

Responses to specific questions

- Q1: Do you agree that the current guideline in relation to rule 37 of the Reconciliation Rules should be used as the threshold for reporting of breaches under the amended Regulations?
- 5. Yes.

- Q2: Do you agree that the proposed threshold for rules 67.3, 70.2 and 72.2 of the Switching Rules should be applied for reporting breaches under the amended Regulations?
- 6. Yes.
- Q3: Do you agree that the proposed threshold for rules 69.1 and 69.2 of the Switching Rules should be applied for reporting breaches under the amended Regulations?
- 7. Yes.

Yours sincerely

Ian Ferguson

Regulatory Policy Manager