

2 October 2023

Electricity Authority  
PO Box 10041  
Wellington 6143

Dear Sarah,

Electricity Networks Aotearoa (ENA) welcomes the opportunity to comment on the Electricity Authority's options to update and strengthen the Consumer Care Guidelines consultation. ENA represents the 27 electricity distribution businesses in New Zealand (see Appendix A) that provide local and regional electricity networks.

ENA and its members support the Consumer Care Guidelines (Guidelines) as they are a vital tool for ensuring and enshrining welfare protections for domestic consumers.

The Guidelines primarily apply to retailers, the ENA in this submission does not provide comment on the retailer-specific provisions of the Guidelines.

ENA broadly supports the Authority's preferred option, which is to codify parts two, six, seven and eight of the Guidelines.

Clause 101 (Part Eight) of the Guidelines covers the disconnection of medically dependent customers (MDCs) in the event of an emergency situation. The nature of emergency situations means that distributors are often unable to notify MDCs prior to disconnection e.g. under the direction of emergency services or broader life may be at more immediate risk.

While distributors are provided some information by retailers about MDCs under clause 91, the content of this information and the means of its communication to the distributors are not specified by the Guidelines. This results in distributors often having incomplete or out-of-date information on MDCs.

ENA recommends that if the Authority decides to mandate part eight of the Guidelines, it either:

- a) modify clause 101 to require distributors to notify an MDC's retailer of an emergency disconnection and oblige the retailer to notify the MDC customer; or
- b) exclude clause 101 from the codification.

These changes will deliver long-term benefits to consumers by reducing the likelihood of incorrect or missed notifications due to distributors holding inaccurate or out-of-date information and limiting contact points with customers.

Yours sincerely

A handwritten signature in blue ink that reads 'Keith Hutchinson'.

Keith Hutchinson

Regulatory manager

## Appendix A

The Electricity Networks Aotearoa makes this submission along with the support of its members, listed below.

Alpine Energy  
Aurora Energy  
Buller Electricity  
Centralines  
Counties Energy  
Electra  
EA Networks  
Firstlight Network  
Horizon Energy Distribution  
Mainpower NZ  
Marlborough Lines  
Nelson Electricity  
Network Tasman  
Network Waitaki  
Northpower  
Orion New Zealand  
Powerco  
PowerNet  
Scanpower  
The Lines Company  
Top Energy  
Unison Networks  
Vector  
Waipa Networks  
WEL Networks  
Wellington Electricity Lines  
Westpower