



Disabled Persons Assembly NZ

March 2024

To: Electricity Authority – Te Mana Hiko

Please find attached DPA's submission on Consumer Plan Comparison and Switching Discussion Paper

For any further inquiries, please contact:

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Disabled Persons Assembly New Zealand



Introducing Disabled Persons Assembly

We work on systemic change for the equity of disabled people

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People's Organisation run by and for disabled people.

We recognise:

- Māori as Tangata Whenua and [Te Tiriti o Waitangi](#) as the founding document of Aotearoa New Zealand;
- disabled people as experts on their own lives;
- the [Social Model of Disability](#) as the guiding principle for interpreting disability and impairment;
- the [United Nations Convention on the Rights of Persons with Disabilities](#) as the basis for disabled people's relationship with the State;
- the [New Zealand Disability Strategy](#) as Government agencies' guide on disability issues; and
- the [Enabling Good Lives Principles](#), [Whāia Te Ao Mārama: Māori Disability Action Plan](#), and [Faiva Ora: National Pasifika Disability Disability Plan](#) as avenues to disabled people gaining greater choice and control over their lives and supports.

We drive systemic change through:

Leadership: reflecting the collective voice of disabled people, locally, nationally and internationally.

Information and advice: informing and advising on policies impacting on the lives of disabled people.

Advocacy: supporting disabled people to have a voice, including a collective voice, in society.

Monitoring: monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

The submission

DPA welcomes this opportunity to give feedback on the Electricity Authority's (EA's) consumer plan comparison and swapping proposals.

DPA have outlined in previous submissions the various issues around energy poverty and affordability that impact upon disabled people.

According to research from the UK¹ and New Zealand,² these issues center around disabled people and people with health conditions needing to use more electricity to stay warm, cool down and or to power disability-related equipment including power wheelchairs, hoist beds and breathing apparatus.

Energy poverty also adds to the challenge of the many disabled people who live on low incomes while facing higher disability related living costs.

DPA supports the general direction of this paper, which aims to ensure that consumers have fewer barriers when assessing whether to switch suppliers.

We are concerned by the low residential switching rates within the New Zealand electricity market and the consequent need to raise the number of active switches.

In this brief submission, we provide recommendations on what needs to be done to improve the process in terms of making information and communications available in accessible formats and encouraging retailers to make more direct contact with disabled people as a high priority customer group.

Our views on the switching proposals

DPA supports the Authority's proposed approach from the options assessment that include:

¹ Sumaria, P. (2022, September 21). Why are disabled people more vulnerable to rising energy costs and what can be done about it? Retrieved from <https://www.regen.co.uk/disability-and-energy/>

² Statistics New Zealand. (2020, October 28). Measuring inequality for disabled New Zealanders: 2018. Retrieved from <https://www.stats.govt.nz/reports/measuring-inequality-for-disabled-new-zealanders-2018>

- Option 4: Authority funded and supported existing or new (externally run) comparison and switching website
- Option A: retailers providing their existing consumers with best plan information.
- Option B: Community advisers to support comparison and switching activity.
- Option C: Promotional activity and campaigns for comparison and switching services.

All options will need to be accessible and inclusive for everyone, including disabled people.

Accessing information is a significant barrier for many disabled New Zealanders, including when it comes to assessing their electricity options.

DPA recommends (as we have in past submissions) that electricity-related information and support to disabled people be provided in accessible formats.

This means that information provided by power retailers such as pamphlets, posters, letters and online information on websites/apps is available in accessible formats including Braille, Large Print, New Zealand Sign Language (NZSL), Easy Read (for people with learning disabilities and English as a second language), as well as video and audio formats.

DPA recommends that the EA, when it updates or creates a new power switching website, build it to the Government's Web Accessibility Standard.

Under proposed Option A, electricity retailers should also act to ensure that their disabled customers (including Medically Dependent Consumers or those self-identifying as disabled people) are designated high priority for active follow up to see whether they are on the right plan.

DPA recommends that the EA require all retailers to undertake customer plan follow ups, especially with disabled customers and other high priority customers on a quarterly basis, especially before the high-power use times of Autumn and Winter.

DPA recommends that the EA and all retailers provide information regarding consumer power-switching options in accessible formats including NZSL, Braille, Easy Read, large print, audio and captioned video.

Recommendation 1: that plan comparison and swapping information from both the EA and power retailers is made available in accessible formats

Recommendation 2: that the Authority when updating or creating a new power switching website build it to the Government's Web Accessibility Standard³.

Recommendation 3: that the EA require all power retailers to ensure that disabled customers are designated high priority customers and that they are actively followed up with around their plans every quarter.

We support having the EA appoint consumer advisers to support consumer switching activity as it would provide consumers, including disabled consumers, with another tool when considering whether to change providers.

DPA recommends that consumer advisers are trained in disability responsiveness and awareness as part of their role. If this training is undertaken as part of the adviser induction process, it will mean that they are equipped to recognise and respond to the needs of disabled electricity customers from their first day on the job.

The proposal to run more promotional campaigns for comparison and switching services would be beneficial as well. These campaigns should be accessible to everyone, including disabled people through making them available in the accessible formats outlined above.

Recommendation 4: that the EA train consumer advisers in disability responsiveness and awareness as part of their induction process.

³ [Web Accessibility Standard 1.1 | NZ Digital government](#)

Recommendation 5: that the EA ensure that all promotional comparison and switching service campaigns are accessible to everyone including disabled people.