



19 November 2019

Submissions  
Electricity Authority  
By email: [ACCES@ea.govt.nz](mailto:ACCES@ea.govt.nz)

**Amendments to clause 11.32E of the Electricity Industry Participation Code  
and EIEPs 13A, 13B and 13C – Technical consultation paper**

Meridian and Powershop appreciate the opportunity to provide feedback to the Electricity Authority on the proposal to revise two initiatives contained in its *Quick Wins for Increasing Access to Electricity Services* consultation paper published in April 2019.

We supported the Authority's April 2019 proposal in principle but had concerns with some of the drafting. We are supportive of the improvements now proposed in the technical consultation paper but make suggestions for improvements in the appended responses to the consultation questions.

Please contact me if you have any queries.

Yours sincerely

A handwritten signature in blue ink, appearing to be "Sam Fleming", with a large loop and a long horizontal stroke.

**Sam Fleming**  
**Regulatory Counsel**

## Appendix A Responses to consultation questions

	Question	Response
1	Do you have contrary views to those of Victoria Casey QC? If so, please elaborate.	We agree with most of Victoria Casey QC's views. However, in places Ms Casey makes assertions that appear unsupported by legal authority or precedent. For example, in paragraph 22, Ms Casey expresses the opinion that consumers would expect their retailer to accept without checking that certain agents who claim to have a customer's authority actually have that customer's authority. We are not sure we agree.
2.	What are your views on the drafting of the proposed amendment to clause 11.32E of the Code?	Meridian is comfortable with the proposed amendments to clause 11.32E of the Code.
3.	What are your views on the amendments to EIEPs 13C, 13A and 13B?	<p>Meridian is comfortable with the proposed amendments but note the following:</p> <p><b>No ability to specify further information required in EIEP13 A or B</b></p> <p>Under the EIEP Transfer Hub process, if further information is requested it will always be a complete Schedule 11.6 form. Proposed clause 11.32ED(3) makes it clear that retailers may ask for the authorisation. However, the EIEP13A and B formats do not include a field for retailers to request this authorisation form or to point out what information is missing from a form already provided. In some situations, the only response possible may be to refuse a request and use the response code "004 – Request rejected, no agent authority". The lack of a field to specify the further information required is especially problematic because proposed clause 11.32EA(2) requires retailers to "specifying the further information required <i>in detail</i>" (emphasis added). The field could be limited to a set of codes so that retailers could only point out that they require the authorisation form or that a certain piece of the authorisation form is missing.</p> <p>It would be much less efficient to attempt to request the completed Schedule 11.6 form or</p>

		<p>point out where one is incomplete via email given that all a retailer will have is the name of the sending party in the EIEP13C file.</p> <p><b>Minor drafting error</b></p> <p>There is a minor typo in the EIEP 13C glossary of abbreviations and terms. The highlighted “of” below should read “or”.</p> <p><u>Requester The cConsumer of authorised agent of a consumer making a request for consumption information of the Cconsumer.</u></p>
4.	Do you have any comments on the drafting of the proposed amendment?	<p>Meridian and Powershop support the proposed amendment but suggest minor changes to Schedule 11.6.</p> <p>The Schedule 11.6 forms for authorisation include a note in square brackets after ICP that states, “[List if known and relevant]” and later there is text that reads, “I confirm that I am a customer of the Current Retailer identified above in relation to the Property and (if relevant) the ICP(s) identified above.”</p> <p>Meridian and Powershop consider ICP identifier(s) to always be relevant as consumption data will always relate to an ICP. Agents and consumers should understand this and can easily find the ICP identifier(s) on an invoice. Obtaining this information is a necessary part of an authorisation to avoid any confusion where there are multiple ICPs at a property. In Meridian’s experience, this is an area where some confusion arises currently.</p> <p>On a similar note, the Schedule 11.6 forms appear to only allow for authorisation to be given for one property. We suggest that the forms should be worded so authorisation can be given for multiple properties on one form. We currently receive multi-property authorisations and associated requests and see no reason why this should not be allowed to continue under the EIEP Transfer Hub process.</p>