

17 December 2019

By email: SwitchProcessReview.submissions@ea.govt.nz

**Utilities Disputes' submission to the Switch Process Review – Issues
with the ICP switching processes and possible options to address
these issues - Discussion paper**

Utilities Disputes welcomes the opportunity to comment on the Switch Process Review Discussion paper. We have responded to a small part of the paper that will assist Utilities Disputes identify secondary networks, who are required to join our Energy Complaints Scheme.

Background

Utilities Disputes provides a free and independent dispute resolution service for electricity, gas, and water complaints, and disputes about access to shared property for broadband installations. Utilities Disputes operates three dispute resolution schemes: the government approved Energy Complaints Scheme and Broadband Shared Property Access Disputes Scheme, and the voluntary Water Complaints Scheme.

All electricity and gas retailers and distributors, including Transpower and First Gas, are required to join the Energy Complaints Scheme.

For the purpose of this submission, Utilities Disputes will refer to all its member companies as 'providers'.

Submission

Secondary network providers are required to join Utilities Disputes' Energy Complaint Scheme, as they provide retail and distribution services.

The paper notes there are three types of secondary networks:

- Customer networks
- Embedded networks
- Network extensions

Utilities Disputes is able to identify embedded networks through the Electricity Authority (EA) Registry.

Utilities Disputes is unable to easily identify customer networks or network extensions. Consumers who are part of a customer network or network extension that is not a provider are missing out on our service.

The paper's Option 1 to address Issue 21 requires distributors to allocate a reconciliation type to ICP identifiers for ICPs connected to network extensions. This option would allow Utilities Disputes to identify network extensions and inform them of their requirement to join Utilities Disputes. We support this option.

We recognise the driver for Option 1 to Issue 21 is to allow for switching. Utilities Disputes would benefit further if this proposal was extended to require customer networks to be identified in the EA Registry. It has been estimated (by the EA) that there are over 100,000 secondary networks in New Zealand, we believe the majority of these are customer networks – this is a large number of consumers missing out on our service.

If we can be of any further assistance, please contact Paul Moreno, Research and Reporting Manager, at p.moreno@utilitiesdisputes.co.nz.

Yours sincerely



Nanette Moreau
Commissioner
Utilities Disputes