

17 December 2019

James Stevenson-Wallace

Submissions

Electricity Authority

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Dear James

Wellington Electricity submission — Switching Process Review

Wellington Electricity Lines Limited (WELL) welcomes the opportunity to make a submission in response to the Electricity Authority's (the Authority) consultation paper "Switching Process Review" published 22 October 2019. This submission refers to this paper as the "Consultation Paper".

WELL understands this is a technical consultation around the practical aspects of the ICP switching process between traders. However, WELL would like to use this as an opportunity to re-iterate that some in energy hardship are not able to switch and miss out on the opportunity to benefit from pricing plans that are better suited to their demand profiles. A key objective of the Electricity Price Review was to increase the number of people switching retailers as a way of reducing customer power bills.

WELL's participation in the EnergyMate programme has shown that customer credit ratings can stop those in Energy Hardship being accepted to an alternative retailer's less expensive pricing plan. Potentially, a large proportion of customers who would benefit the most from cheaper electricity prices are not able to move from their current retailer as they do not meet the credit term requirements of the new provider.

Convincing customers to use the energy switching tools and to consider moving to another retailer is only part of the solution – providing alternative pricing plans that customers with poor credit ratings can move to is also needed to support access to cheaper electricity pricing. At present the energy sector does not support low income families and would fail the Electricity Price Review fairness and affordability test.

If you have any questions or there are aspects you would like to discuss, please don't hesitate to contact Scott Scrimgeour, Commercial and Regulatory Manager, at sscrimgeour@welectricity.co.nz.

Yours sincerely

Greg Skelton

Chief Executive Officer