

## Appendix C Format for submissions

<b>Submitter</b>	Mark Hughes, Paua to the People
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*All questions are optional. Please answer as many or as few as you wish. Thank you.*

Questions	Comments
<b>Proposal A – Standardise billing information</b>	
Q1. Should minimum billing standards be compulsory or voluntary??	If you want anything it needs to be compulsory. However, each requirement you put onto retailers make customers more and more unprofitable. There is no margin now for most retail customers so without relief this initiate could have unintended consequences.
Q2. Would the Authority providing a model bill and guidelines reduce your implementation costs and the time needed to implement these changes?	Yes
Q3. Tiered layout – Do you support adopting a two-tiered approach to information on bills? If not, how should critical and important information be distinguished?	Who cares. Seems a reasonable list to have on the bill.
Q4. Content requirements – Do you have any additions or removals to the proposed tier one and tier two content lists?	No
Q5. Implementation – For retailers, how much time would be needed for your organisation to incorporate this content across all billing channels? What challenges or dependencies (e.g. data collection, data standards, IT systems or staff training) need to be factored into timing?	<p>To keep comparisons relevant and accurate this is a massive build that will quickly be out of date and require constant budget to add new calculations. Retailers have to price according to the structure of distributor price structures which have no real controls, and each are different and evolving and each distributor is different.</p> <p>I do not see this ending with the simple comparison you envisage.</p>

	I can see the political appeal of this as it makes it easy for customers but are customers willing and able to pay for it? This could rapidly turn into a money sink.
Q6. Future-proofing – What mechanisms would best ensure these standards to evolve with new technologies, plans and AI-enabled billing in future?	<p>Make Distributors use industry agreed price structures.</p> <p>Mandate retail price structures and remove the ability of retailers to use acquisition offers.</p> <p>Fix the market to support a \$0.00 per kWh comparison.</p>
<b>Proposal B – Introduce better plan</b>	
Q7. Do you agree with the proposed better plan review mechanism?	No. Retail margins have killed switching not a lack of access to comparisons.
Q8. Is six months the right frequency for a better plan review?	What do customers want? There is a cost to providing this which further erodes retailer margins.
Q9. Is three months an appropriate time frame for time-of-use trials? If not, what period would you suggest?	
Q10. Do you have any feedback on the risk-free time of use proposal, requirement to inform customers whether they are saving on a time-of-use plan and type of guidance given on how to shift consumption?	
Q11. Do you support prohibiting termination fees when switching between plans with the same retailer?	Yes. There should be no fees for customer service.
Q12. For retailers, what costs do you anticipate in implementing this change and what implementation support would reduce such costs?	<p>Previously this work was undertaken by Consumer Powerswitch. This initiative seems to advocate that this work is now done by every retailer. Centralise the comparison.</p> <p>Make the MEP responsible for managing and owning the HHR data so that it can be done centrally and that</p>

	the costs of collecting and managing data can be spread to the CM, Distributors, Retailers and the EA rather than having Retailers incur the cost of supplying the rest of the industry with data.
Q13. Do you agree with our proposed transitional arrangements? If not, how would you change them?	
<b>Proposal C – Encourage consumers to compare plans across all retailers and switch where it will save them money</b>	<p>Why are you making this the responsibility of retailers?</p> <p>This will not fix the cost-of-living crisis for financially vulnerable families as they will still struggle to find another retailer to take them on. If this comparison is successful then it will again only benefit those willing and able to switch.</p>
Q14. Do you agree with the proposed wording of the prompt?	Who cares.
Q15. For retailers, what lead-in period would you need to implement this prompt across all channels?	A week
Q16. Do you agree that each retailer should be required to maintain a catalogue to allow customers to compare their full range of plans and costs?	No. I can see the appeal for tackling Gentailers but again this potentially removes innovation from retailer pricing and continues to erode retailer margins.
Q17. For retailers, do you already have a catalogue in which you show your current and any prospective customers your generally available plans and tariffs? If not, why not?	No. We only have a single tariff.
Q18. Do you agree that the annual check-in should also include telling customers about the retailer's channels for comparing and accessing better plans?	No. It should not be the retailers responsibility to do a mandatory review with customers. We also should not be responsible for pulling together all the sweepings from the poorly designed NZ electricity market to give some level of clarity to end users about where they could locate cheaper power.

Q19. Do you agree that retailers should offer information about better plans whenever a customer contacts them about their bill or plan, not only when the customer explicitly asks to change plans?	No.
<b>Proposal D – Limit back-billing to protect residential and small business consumers from bill shock</b>	<p>Largely agree with limiting back billing except that you need to fix the industry to support it.</p> <ol style="list-style-type: none"> <li>1. Data quality is poor because MEP have no incentive to improve it.</li> <li>2. All the data management costs have been loaded to retailers. This should be with MEP so that they can supply the industry and share the costs between the CM, Distributors, Retailers and the regulator. One source of truth sitting with the MEP.</li> <li>3. Reconciliation should use HHR (tick)</li> <li>4. Get rid of the current 1/3/7/14 cycles for reconciliation and distributors by using the above.</li> </ol>
Q20. Do you agree with this proposal to limit back-billing with justifiable exceptions?	Yes
Q21. Is a six-month cap reasonable?	No. You need to fix the industry first.
Q22. Do you agree that customer should be allowed to pay back bills in instalments matching the period of the back bills? If not, what alternative do you propose?	Only if you agree that Retailers can pay our creditors in instalments.
Q23. What additional proactive measures (beyond those listed) would best prevent back bills from accruing?	
Q24. For retailers, taking into account any operational requirements, is the proposed transition period sufficient to implement these obligations?	

<b>Next steps and proposed implementation</b>	
Q25. Are these the right outcome measures to track success?	
Q26. Do you agree with these implementation principles?	
Q27. How could we best support smaller retailers during the transition?	
Q28. Are there other interdependencies we should factor into the timetable?	
Q29. Do you agree with our preferred timing?	
Q30. If you prefer option 3, which elements should be delayed to 2027?	
Q31. How much lead time do you need to implement these proposals, should they proceed?	
<b>Regulatory statement for the proposed amendment</b>	
Q32. Do you agree with the objectives of the proposed amendment?	
Q33. Do you agree that the benefits of the proposed Code amendment outweigh its costs?	
Q34. Do you have any feedback on these criteria for weighing options?	
Q35. Do you agree with our assessment of the four options presented?	
Q36. Do you agree with our proposal to introduce mandatory	

billing improvements, rather than voluntary guidelines?	
Q37. Which elements of standardisation (if any) could remain voluntary without undermining consumer outcomes?	
Q38. Do you agree with our proposed approach regarding small businesses?	
Q39. Do you agree with our assessment on alternatives to proposal B?	
Q40. Do you agree with our assessment on alternatives to proposal C?	
Q41. Do you agree with our assessment on alternatives to proposal D?	
Q42. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	
Q43. Do you agree the proposals are overall better than the alternative considered? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	
<b>Proposed Code amendment</b>	

Q44. Do you have any comments on the drafting of the proposed amendment?	
Q45. Do you have any comments on the transitional provisions?	
Q46. Do you have any other feedback on this consultation paper or proposed Code amendment?	

Will muddy comparisons stimulate customers to actively switch retailers? The current slump in switching is because no independent retailer wants to acquire more unprofitable customers.

Retail margins remain at predatory levels – when are we going to see some relief? We already have a negative margin for retail customers especially when you factor in bad debt, payment plans and rising metering and distributor charges so it is even less likely that we will be recruiting more customers which also typically come with a cost of acquisition.

I can see price comparisons turning into a money pit that will limp along to satisfy auditors. But I could be wrong. It seems an unlikely focus of the EA for where to spend Gentailer Development \$. Comparisons will require significant development every year as there are not price structure control on Distributors that make up ~40% of cost to supply.

I suspect that the reality of what will be provided by retailers for customer comparisons will in no way match the expectation of the EA. Honestly I believe that what you are wanting will never actually be delivered.

If you are looking for a comparison have the retailers simply supply the average per kWh rate for each plan. This would then enable customers to understand the retailer wrap around services and be able to choose the right package for them.