

## Appendix C Format for submissions

<b>Submitter</b>	Debbie Leyland on behalf of United Community Action Network (UCAN)
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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??	Compulsory
Q2. Would the Authority providing a model bill and guidelines reduce your implementation costs and the time needed to implement these changes?	NA
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?	Yes
Q4. Content requirements – Do you have any additions or removals to the proposed tier one and tier two content lists?	<p>Rename “product identifier code” to “plan identifier code” (or similar) so customers clearly know it refers to their electricity plan.</p> <p>Ensure Better Plan messages clearly state they relate only to the current retailer, not all companies.</p> <p>Example wording:</p> <p>“You’re on the cheapest plan with [Company Name]. We’ll check again on [Date].”</p>

	Or: “You’re not on the cheapest plan [Company Name] offers. You may save on [Plan Name]. Contact [Details]. We’ll check again on [Date].”
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?	Many families/people are unable to make ends meet. These changes are must be implemented as soon as possible. No later than April 1 <sup>st</sup> . This would give consumers time to find the cheapest plan going into Winter 2026.
Q6. Future-proofing – What mechanisms would best ensure these standards to evolve with new technologies, plans and AI-enabled billing in future?	Reassess every 5 years or as required.
<b>Proposal B – Introduce better plan</b>	
Q7. Do you agree with the proposed better plan review mechanism?	Yes we support this proposal.  It’s reasonable to require companies to regularly review customers’ plans. They already have the data and systems to do so, as shown by Flick. Bundling shouldn’t prevent identifying better options — companies already separate electricity charges and can advise customers if another plan or bundle would be cheaper.
Q8. Is six months the right frequency for a better plan review?	Yes. Longer intervals risk leaving customers on unsuitable plans if new options appear soon after a review.
Q9. Is three months an appropriate time frame for time-of-use trials? If not, what period would you suggest?	At six months, the retailer would do the Better Plan check, allowing the customer to switch without a fee and ensuring they remain on the right plan.
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?	Looks OK

Q11. Do you support prohibiting termination fees when switching between plans with the same retailer?	<p>Definitely. Prohibited all exit/break fees and free offers when signing up new consumers.</p> <p>We strongly disagree with your proposal not to include these fees at this time. Many people on low incomes are not able to change power companies due to the exit fees, which can be \$150. Per fossil. Which locks them into a power company they can not afford to pay. Which result in money being taken from their household budget that was for food, other house bills.</p>
Q12. For retailers, what costs do you anticipate in implementing this change and what implementation support would reduce such costs?	
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>	
Q14. Do you agree with the proposed wording of the prompt?	<p>See answer to Q4.</p> <p>To reduce the risk of confusion with the Better Plan message, require that this prompt clearly indicates comparison with different retailers. For example:</p> <p>“Could you save money with a different company?</p> <p>Compare plans at the independent and government-funded site [TBC].org.nz. The Electricity Authority requires us to include this information”</p> <p>Please also require wording to introduce the Better Plan message, so it is clear that that refers to best plan with that retailer. For example:</p> <ul style="list-style-type: none"> <li>• (When introducing better plan message):</li> </ul> <p>“You are on the cheapest plan with [insert company name]. We will check your plan</p>

	<p>again on DATE.”</p> <ul style="list-style-type: none"> <li>• OR “You are not currently on the cheapest plan that [insert company name] offers. Based on your usage, you may be better off on XXXX plan. To switch plans, contact [insert contact details]. We will check your plan again on Date.”</li> </ul>
Q15. For retailers, what lead-in period would you need to implement this prompt across all channels?	
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?	Yes
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?	
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?	Yes
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?	Yes. If the company has assessed there is a better plan available, they need to remind the customer in each interaction.
<b>Proposal D – Limit back-billing to protect residential and small business consumers from bill shock</b>	

Q20. Do you agree with this proposal to limit back-billing with justifiable exceptions?	Yes.
Q21. Is a six-month cap reasonable?	No. 4 months would have better outcomes for their consumers.
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?	Yes.
Q23. What additional proactive measures (beyond those listed) would best prevent back bills from accruing?	Maybe. Offer information and support regarding how to install smart-meters in cases where consumers don't have these
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?	Seems OK
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?	Definitely option 1. The other options delay positive outcomes for consumers.
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?	Looks OK
Q33. Do you agree that the benefits of the proposed Code amendment outweigh its costs?	Yes.
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?	Yes. Compulsory billing standards are long overdue. Confusing bills limit switching, leaving many households paying more than necessary. With energy hardship rising and switching rates at just 6%, the Authority must act now.
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?	Ban all break fees and “freebies” that trap customers in hardship. At minimum, waive fees for those struggling, as these charges and incentives lock people into unaffordable plans and block switching, undermining customer mobility.
Q40. Do you agree with our assessment on alternatives to proposal C?	Yes.

Q41. Do you agree with our assessment on alternatives to proposal D?	4 month cap regarding back billing would be preferred.
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.	Yes.
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.	Yes.
<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?	