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**By online submission**

## **Submission on Electricity Authority's Retailer financial stress data request Consultation Paper**

### **Introduction**

Utilities Disputes Limited | Tautohetohe Whaipainga (UDL) welcomes the opportunity to comment on the Electricity Authority's (EA) Retailer financial stress data request Consultation Paper.

### **Summary of submission**

We believe the information the EA has requested meets the noted objectives. We hold additional cross-industry information that may be relevant to the EA. We are also aware of some current work that may be of interest to the EA (should the EA not already be aware of same) being completed by the Commerce Commission expanding the information disclosure requirements for distributors.

### **UDL**

UDL is an independent, not-for-profit company that provides fair and independent resolution of complaints and disputes between utilities companies and their customers when they are unable to be resolved between the parties. We also resolve indemnity disputes between scheme members.

We currently operate three dispute resolution schemes: The Government approved Electricity and Gas Complaints Scheme, Broadband Shared Property Access Disputes Scheme, and a voluntary Water Complaints Scheme.

We facilitate a strong relationship of trust between consumers and utilities organisations and focus on three aspects - Prevent, Educate and Resolve.

## The information requested meets the EA's objectives

We believe the proposed information requested of retailers meets the EA's objectives of:

- Having an increased focus on industry monitoring, so that it can understand exactly what is occurring in the industry in order to promptly respond to unforeseen events when necessary
- Monitoring the extent to which consumers face difficulties paying their electricity bills and how these difficulties impact electricity retailers. Then using the information to inform its regulatory decision making as well as, supporting consumers, industry and the government in making effective decisions, particularly in response to major unforeseen events and economic disruption such as the global pandemic.

We believe the proposed data sets are a sensible way to meet these objectives. We note additional areas where the EA could request further information, the first two would give an indication of alignment with the Consumer Care Guidelines:

- Whether retailers have reviewed their terms and conditions during the year
- The number of interventions of targeted assistance each retailer has used as an alternative to disconnection
- The number of prepay customers a retailer has.

While we are not best placed to comment on the costs of providing this information we expect electricity retailers will inform the EA if there are any concerns in that regard.

We hold additional across-industry information about consumers that may be relevant to this project. For example, UDL can provide the EA with information about complaints that include issues of:

- disconnection, including pending disconnection;
- non-payment; and
- medical dependency.

UDL's complaints data could be combined or tracked against stress data for a particular event to see what impact it had on the consumer-retailer relationship. We could also adjust the data we collect at UDL to best meet the needs of the EA, this will be most effective if the data requested by the EA is consistent and at regular intervals.

## Commerce Commission Targeted Information Disclosure Review – Electricity Distribution Businesses

The Commerce Commission is currently considering expanding the information disclosure requirements on distributors. This includes additional requirements on distributors to disclose information around customer service (including complaints). The EA may find learnings in this project.

Thank you for the opportunity to make this submission. If there are any queries or you would like to discuss the further information UDL could provide, please contact Paul Moreno at paul@udl.co.nz.

Ngā mihi nui

A handwritten signature in blue ink, appearing to read 'M Ollivier', with a horizontal flourish extending to the right.

**Mary Ollivier**

Commissioner: Komihana

Utilities Disputes Limited:Tautohetohe

Whapainga