

# Medically dependent consumer guidelines and vulnerable consumer guidelines

## Group outputs: Workshop 3

Wellington, 29 July 2020. Facilitator: Debbie Francis

Zoom session, 30 July. EA staff hosting: James Tipping, Ron Beatty, Tamara Linnhoff

# Discussion on curly questions

Do we need a definition for vulnerability, or could this be flagged as a possibility via specific markers?

## A sample of comments from workshop attendees (Q1):

- Yes, need a definition
- No, don't rely on a definition, especially as situations change over time. How to capture temporary vulnerability?
- Check CCCFA and FMA definitions/approach, and Kiwisaver (withdrawal criteria?)
- Look at using a number of agencies to help identify the right people
- Definition could be 'at risk of not paying, or haven't paid'
- Australia – undefined hardship.
- Consider a positive framing, eg 'Additional care and value'
- If we're not measuring anything, then don't need to define!

## A sample of comments from Zoom attendees (Q1):

- All customers should be treated alike.
- All retailers should become aware of a customer's situation at sign up.
- At Retailer X, MDCs are identified at the start of their contract, are flagged, and cannot be disconnected. They receive separate treatment.
- For everyone else, CSRs flag customers at VC if they mention specific words: being elderly, in hospital, having young children.
- If a customer enters into a credit cycle, everyone is treated as vulnerable. So don't need specific definition of vulnerability
- VC is defined via inability to pay. Need to pay attention to disabilities sector – have been ignored in this process so far. No point sending a letter to a blind customer or asking them to 'press 3' on their phone. VC is a misnomer is talking about non-payment. It's also due to a host of other factors.
- Interconnectedness of what we're looking at – so many relevant factors. During L3 and L4 over 120,000 new clients came through to the Salvation Army. Vulnerability changes all the time. Over half of the 120,000 new clients will have a problem debt issues: to power companies, finance companies, loan sharks.
- Need to remove barriers to be able to helping people. If require a definition, then meeting that definition could in itself create a barrier to someone receiving assistance

## A sample of comments from Zoom attendees (Q1 continued):

- The guidelines should include reaching out and offering support when customers are facing debt issues. So can get support to those people sooner rather than later. If a bill comes someone can't pay, then they go to a loan shark, even less likely they'll be able to pay the next bill.
- Need more early intervention. Consider a Bank's CRS – referrals to Money Talks at earliest point. [not sure if accurately captured this point]
- Do need to know that all retailers will have the same processes and apply those in the same way.
- If we ID someone in trouble, 1) when debt starts and 2) when debt escalates. The front end element is very important.
- The guidelines should apply to everyone who is having trouble to pay their bills.
- Should apply to everyone, but also be aware of markers of vulnerability
- Thinking about people ho's situation changes, eg family violence – can include questions up front (eg are you receiving support) but won't capture all, as some people move into vulnerability.
- We should design some questions that retailers would ask that would help retailers better identify
- Be aware of 3 main risk factors to retailers: financial, reputational and legal
- When people sign up to a supplier, they have every intention of paying their bills. There will be a degree of reluctance, of not wanting to share personal information with an energy retailer. Plus might be OK at the time they sign up. We need to encourage people to talk to their retailers.

# Discussion on curly questions

**Q2: What about those customers who cannot find a retailer?**

## **A sample of comments from workshop attendees (Q2):**

- No retailer should be able to 'dump' a customer
- Retailer X maintains a sense of responsibility attached to an ICP: if previously supplied, they hold an obligation to find a solution for the person who is now living there.
- If a person can't find a retailer, they should be referred to the EA who then finds them a retailer – analogy with children who have special educational needs, or people who cannot find a GP.
- Retailers should have to take these customers – part of a social licence to operate
- Every retailer should have a product (eg payment terms) that provide for a vulnerable customer
- T2 retailers should be covered: 'if you have the power to action a disconnection then you should be covered'
- The Consumer Guarantees Act (1993) was the first pieces of legislation to be principles-based. It works: what was 'reasonable' in 1993 is different to what is reasonable now. Allows for a change in interpretation of reasonableness over time.

## Q2 A sample of comments from workshop attendees (Q2 continued):

- Who takes responsibility for the customers who won't qualify for Work & Income support?
- A \$150 bond used to be a monthly average bill. No use today to a retailer, already in a 45 day credit cycle. Plus a customer facing payment difficulties needs that cash
- Retailers should inform WINZ sooner, rather than WINZ being an ambulance at bottom of cliff
- When signing up, retailers could ask 'can you afford bond?'. If not, find out if WINZ already support. Could WINZ underwrite 'a month worth of energy' as a guarantor? So no need for consumes to find the bond
- When moving house, many people already struggle to find tenancy bond and advance rent. The power bond then comes on top of that.
- Retailers should offer different products: offer pre-pay, so no chance customers will accumulate debt.
- A 'retailer of last resort'. Or a central government agency should manage all these relationships.
- WINZ doesn't get involved up front with bonds etc. WINZ would push for retailers to find ways to assist customers.
- Not everyone qualifies for MSD hardship assistance.
- Maybe the bond should be paid as an advance on the winter energy payment (and later deducted from that).
- Check the NAB Case Study in Harvard Business Review: 97% of consumers want to pay their bills, only 3% don't.
- 'Need to fix the issue of being able to verify a customer'
- Consider Watercare (Auckland)'s approach: they restrict flow of water to a property.

# Discussion on curly questions

Q3: Do we need a definition of reasonableness?

## A sample of comments from Zoom attendees (Q3):

- Need clear points around what reasonableness means
- Don't want too much prescription, want to ensure retailers can innovate, and also do what a customer wants.
- Need to future proof the guidelines
- OK to include examples of reasonableness, but don't prescribe specific actions
- Need to consider innovation
- Support agencies want a consistency on what can be expected from a retailer? So agencies supporting have predictability. Retailers also need to trust the support agencies
- Retailers have changes since when the guidelines were written. Retailers are no longer all the same.
- There are some very different ones (smaller retailers). If we create costs, these will be passed through to consumers in higher bills.

# Exercise 1 - Instructions

Test worked example for Scenario 4: Payments arrears (customer is engaging)

Each table of workshop attendees will consider whether

1. For the worked example – do we need a prescribed standard?
2. How the example works for each persona's specific situation:

Table 1	Table 2	Table 3	Table 4	Table 5
Test worked example for consumer specific situations:				
Wiremu	Lea	Amena	Carl & Steph	Maggie

1. For each row in your **EXAMPLE worksheet**:

- Do we need a prescribed standard?

2. For your consumer (on their A3):

- What works?
- What doesn't work?
- What's missing – critical gaps in our safety *net*?

### Capture thoughts on:

1. The worked example Exercise 1 sheet: tick/comment on whether each row needs guidance and/or a prescriptive standard?
2. Comment on the package from your consumer's perspective – use the A3 Persona worksheet

### Reference material:

- Your table's consumer persona



# Exercise 1 (Table 1)

## Scenario 4: Payments arrears (customer is engaging)

The Supplier should, may (or must?)		Obligation created via	
		Guideline re process/action	Minimum standard (specified process/action)
<b>Identification</b>	Engage with the customer when the customer advises they have payment difficulties	X	
	Notify the customer (or their alternate contact) via the agreed communication method that a bill has not been paid and engage		X
	Seek to determine whether the customer's status might be MDC or VC	X- ??	
<b>Manaakitanga</b>	Ensure that if the premises are recorded as vacant but are occupied potentially by a domestic consumer, make reasonable efforts to ensure engagement with the consumer	X	
	Offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood		X
	Seek to ensure that the non-payment process is understood by the customer, including the potential for progression to disconnection		X
	Seek agreement (if not already held e.g. from at sign up) for a referral to WINZ	X	
	Seek agreement (if not already held e.g. from at sign up) for a referral to a wider support agency (or agencies) e.g. budgeting services	X	
<b>A level playing field</b>	May charge late a reasonable payment penalty fee	X	
	Allow a minimum of 7 working days for a response from WINZ		X
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue	X	
<b>Working with partners</b>	Support the customer with a referral to WINZ and assistance where it can during the WINZ process	X	
	if the WINZ outcome is insufficient, support the customer with a referral to a recognised wider support agency (or agencies) e.g. budgeting services		X
	Adhere to agreed protocols for engagement with (and supply of information to) WINZ and recognised wider social agencies		X

# Exercise 1 (Table 2)

## Scenario 4: Payments arrears (customer is engaging)

The Supplier should, may (or must?)		Obligation created via..	
		Guideline re process/action	Minimum standard (specified process/action)
<b>Identification</b>	Engage with the customer when the customer advises they have payment difficulties	X	X
	Notify the customer (or their alternate contact) via the agreed communication method that a bill has not been paid and engage	X	X
	Seek to determine whether the customer's status might be MDC or VC	X	X
<b>Manaakitanga</b>	Ensure that if the premises are recorded as vacant but are occupied potentially by a domestic consumer, make reasonable efforts to ensure engagement with the consumer	X	X
	Offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood	X	X
	Seek to ensure that the non-payment process is understood by the customer, including the potential for progression to disconnection	X	X
	Seek agreement (if not already held e.g. from at sign up) for a referral to WINZ	X	X
	Seek agreement (if not already held e.g. from at sign up) for a referral to a wider support agency (or agencies) e.g. budgeting services	X	X
<b>A level playing field</b>	May charge late a reasonable payment penalty fee	X	X
	Allow a minimum of 7 working days for a response from WINZ	X	X
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue	X	X
<b>Working with partners</b>	Support the customer with a referral to WINZ and assistance where it can during the WINZ process	X	X
	if the WINZ outcome is insufficient, support the customer with a referral to a recognised wider support agency (or agencies) e.g. budgeting services	X	X
	Adhere to agreed protocols for engagement with (and supply of information to) WINZ and recognised wider social agencies	X	X

How might this solution perform for consumer persona 'Lea'?

Noted:

- Minimum standards for identification required
- Importance of securing connection /relationship with alternate contact due to customer personal situation

# Exercise 1 (Table 3)

## Scenario 4: Payments arrears (customer is engaging)

The Supplier should, may (or must?)		Obligation created via	
		Guideline re process/action	Minimum standard (specified process/action)
<b>Identification</b>	Engage with the customer when the customer advises they have payment difficulties		
	Notify the customer (or their alternate contact) via the agreed communication method that a bill has not been paid and engage	X	X
	Seek to determine whether the customer's status might be MDC or VC		
<b>Manaakitanga</b>	Ensure that if the premises are recorded as vacant but are occupied potentially by a domestic consumer, make reasonable efforts to ensure engagement with the consumer	X- alternative measure	X- alternative payment options
	Offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood		X- ensure potential disconnection is understood
	Seek to ensure that the non-payment process is understood by the customer, including the potential for progression to disconnection	X	
	Seek agreement (if not already held e.g. from at sign up) for a referral to WINZ	X	
	Seek agreement (if not already held e.g. from at sign up) for a referral to a wider support agency (or agencies) e.g. budgeting services	X	
<b>A level playing field</b>	May charge late a reasonable payment penalty fee	X	
	Allow a minimum of 7 working days for a response from WINZ	X	
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue	X	
<b>Working with partners</b>	Support the customer with a referral to WINZ and assistance where it can during the WINZ process	X	
	if the WINZ outcome is insufficient, support the customer with a referral to a recognised wider support agency (or agencies) e.g. budgeting services	X- refer to WINZ last resort	
	Adhere to agreed protocols for engagement with (and supply of information to) WINZ and recognised wider social agencies		

# Exercise 1 (Table 4)

## Scenario 4: Payments arrears (customer is engaging)

The Supplier should, may (or must?)		Obligation created via	
		Guideline re process/action	Minimum standard (specified process/action)
Identification	Engage with the customer when the customer advises they have payment difficulties		X
	Notify the customer (or their alternate contact) via the agreed communication method that a bill has not been paid and engage		X
	Seek to determine whether the customer's status might be MDC or VC		X
Manaakitanga	Ensure that if the premises are recorded as vacant but are occupied potentially by a domestic consumer, make reasonable efforts to ensure engagement with the consumer	X	
	Offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood		X
	Seek to ensure that the non-payment process is understood by the customer, including the potential for progression to disconnection		X
	Seek agreement (if not already held e.g. from at sign up) for a referral to WINZ		X
	Seek agreement (if not already held e.g. from at sign up) for a referral to a wider support agency (or agencies) e.g. budgeting services		X
	May charge late a reasonable payment penalty fee	50%	50%
A level playing field	Allow a minimum of 7 working days for a response from WINZ		X
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue	X	
Working with partners	Support the customer with a referral to WINZ and assistance where it can during the WINZ process	X	
	if the WINZ outcome is insufficient, support the customer with a referral to a recognised wider support agency (or agencies) e.g. budgeting services	X	
	Adhere to agreed protocols for engagement with (and supply of information to) WINZ and recognised wider social agencies	X	

### How might this solution perform for consumer persona 'Carl and Steph'?

- Customer engagement and retailer engagement is working
- MDC/VC –confirmation notes because of customer engagement
- Customer is offered payment alternatives, third party support from social agencies
- Non-payment process is understood by customers as a retailer is able to communicate with customer
- Late payment fee is not working for the customer as adding to their bill, but this cost cannot be avoided by the retailer as this impacts cost to service of all other customers

# Exercise 1 (Table 5)

## Scenario 4: Payments arrears (customer is engaging)

The Supplier should, may (or must?)		Obligation created via	
		Guideline re process/action	Minimum standard (specified process/action)
<b>Identification</b>	Engage with the customer when the customer advises they have payment difficulties	X	X
	Notify the customer (or their alternate contact) via the agreed communication method that a bill has not been paid and engage	X	X
	Seek to determine whether the customer's status might be MDC or VC	X	X
<b>Manaakitanga</b>	Ensure that if the premises are recorded as vacant but are occupied potentially by a domestic consumer, make reasonable efforts to ensure engagement with the consumer	X	
	Offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood	X	X
	Seek to ensure that the non-payment process is understood by the customer, including the potential for progression to disconnection	X	X
	Seek agreement (if not already held e.g. from at sign up) for a referral to WINZ	X	X
	Seek agreement (if not already held e.g. from at sign up) for a referral to a wider support agency (or agencies) e.g. budgeting services		
<b>A level playing field</b>	May charge late a reasonable payment penalty fee	X	
	Allow a minimum of 7 working days for a response from WINZ	X	X
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue	X	X
<b>Working with partners</b>	Support the customer with a referral to WINZ and assistance where it can during the WINZ process	X	X
	if the WINZ outcome is insufficient, support the customer with a referral to a recognised wider support agency (or agencies) e.g. budgeting services	X	
	Adhere to agreed protocols for engagement with (and supply of information to) WINZ and recognised wider social agencies	X	

### How might this solution perform for consumer persona 'Maggie'?

- Maggie is not engaging
- If T&C of retailer says refer to WINZ this could be next step ( or a social agency)
- Site visit to engage with customer
- No remote disconnection if not spoken to customer

### Other notes

- The word 'Penalty' is loaded
- Seeking agreement for WINZ referral at signup, could be risky, but should be undertaken in financial distress

# Exercise 2 - Instructions

Test worked example for Scenario 5: Disconnection (customer is not engaging)

Each table will consider whether

1. For the worked example – do we need a prescribed standard?
2. How the example works for each persona's specific situation:

Table 1	Table 2	Table 3	Table 4	Table 5
Test worked example for consumer specific situations:				
Wiremu	Lea	Amena	Carl & Steph	Maggie

1. For each row in your **EXAMPLE** worksheet:

- Do we need a prescribed standard?

2. For your consumer (on their A3):

- What works?
- What doesn't work?
- What's missing – critical gaps in our safety *net*?

### Capture thoughts on:

1. The worked example Exercise 1 sheet: tick/comment on whether each row needs guidance and/or a prescriptive standard?
2. Comment on the package from your consumer's perspective – use the A3 Persona worksheet

### Reference material:

- Your table's consumer persona

# Exercise 2 (Table 1)

## Scenario 5: Disconnection (customer is not engaging)

The Supplier should, may (or must?)		Obligation created via	
		Guideline re process/action	Minimum standard (specified process/action)
Identification	Seek to determine whether the customer's status (or a consumer at the premises) might be MDC or VC via other methods <i>(should the Authority explain what other methods/data could be?)</i>	X	
Manaakitanga	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using the customers preferred communication method		X
	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using alternative agreed (at sign up) communication methods and using the recommended processes  <i>(which could be defined by the Authority in a minimum standard and could include letter, phone calls, app notifications, emails, personal visit, contact to alternative contact, track and trace courier letter)</i>		
	Place a hold on the electrical disconnection if an MDC is determined to be resident at the customers premises	X	
	If the customer engages, offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood.		X
	Not carry out a disconnection at a time that would endanger a domestic consumer's wellbeing (for example just before nightfall) or if it would be unreasonably difficult for the account holder to seek rapid reconnection (e.g. after midday on the day before a weekend or public holiday, at night, or during a public holiday).	X	
	Attempt to contact customers who have not been electrically reconnected within 3 business days to see how they are living without power and revisit support options available	X	
A level playing field	Restore the electricity supply as soon as reasonably practicable once the customer has satisfied the requirements for electrical reconnection. [which are?]	X	
	[For attempts at consumer contact - Specify a minimum X number of attempts via minimum 3 different methods over minimum 14 working days]	X	
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue	X	
Working with partners	Set a charge for disconnection and/or reconnection that will not exceed the overall costs of the disconnection and/or reconnection service	X	
	Defer the disconnection if its contract with the customer permits the supplier to refer the customer to WINZ or wider recognised social agencies as they may be successful in making contact with the customer	X	
	Reconnect the customer if an acceptable agreement is entered into with the customer or with WINZ or with a wider recognised social agency enters into an acceptable arrangement with the supplier	X	
Working with partners	Inform WINZ that a disconnection has occurred (if consent to WINZ referral was previously provided) and the supplier believes the customer may be vulnerable	X	



# Exercise 2 (Table 2)

## Scenario 5: Disconnection (customer is not engaging)

The Supplier should, may (or must?)		Obligation created via	
		Guideline re process/action	Minimum standard (specified process/action)
Identification	Seek to determine whether the customer's status (or a consumer at the premises) might be MDC or VC via other methods <i>(should the Authority explain what other methods/data could be?)</i>	X	X
Manaakitanga	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using the customers preferred communication method	X	X
	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using alternative agreed (at sign up) communication methods and using the recommended processes  <i>(which could be defined by the Authority in a minimum standard and could include letter, phone calls, app notifications, emails, personal visit, contact to alternative contact, track and trace courier letter)</i>	X	X
	Place a hold on the electrical disconnection if an MDC is determined to be resident at the customers premises	X	X
	If the customer engages, offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood.	X	X
	Not carry out a disconnection at a time that would endanger a domestic consumer's wellbeing (for example just before nightfall) or if it would be unreasonably difficult for the account holder to seek rapid reconnection (e.g. after midday on the day before a weekend or public holiday, at night, or during a public holiday).	X	X
	Attempt to contact customers who have not been electrically reconnected within 3 business days to see how they are living without power and revisit support options available	X	X
	Restore the electricity supply as soon as reasonably practicable once the customer has satisfied the requirements for electrical reconnection. <i>(which are?)</i>	X	X
	A level playing field	[For attempts at consumer contact - Specify a minimum X number of attempts via minimum 3 different methods over minimum 14 working days]	X
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue	X	X
	Set a charge for disconnection and/or reconnection that will not exceed the overall costs of the disconnection and/or reconnection service	X	X
Working with partners	Defer the disconnection if its contract with the customer permits the supplier to refer the customer to WINZ or wider recognised social agencies as they may be successful in making contact with the customer	X	X
	Reconnect the customer if an acceptable agreement is entered into with the customer or with WINZ or with a wider recognised social agency enters into an acceptable arrangement with the supplier	X	X
	Inform WINZ that a disconnection has occurred (if consent to WINZ referral was previously provided) and the supplier believes the customer may be vulnerable	X	X

How might this solution perform for consumer persona 'Lea'?

- Text, phone call and field visit
- Provision of prepay, fortnightly billing or smooth pay



# Exercise 2 (Table 3)

## Scenario 5: Disconnection (customer is not engaging)

The Supplier should, may (or must?)		Obligation created via	
		Guideline re process/action	Minimum standard (specified process/action)
Identification	Seek to determine whether the customer's status (or a consumer at the premises) might be MDC or VC via other methods <i>(should the Authority explain what other methods/data could be?)</i>	X-options for days	X-must do it
Manaakitanga	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using the customers preferred communication method		X
	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using alternative agreed (at sign up) communication methods and using the recommended processes  <i>(which could be defined by the Authority in a minimum standard and could include letter, phone calls, app notifications, emails, personal visit, contact to alternative contact, track and trace courier letter)</i>	X	
	Place a hold on the electrical disconnection if an MDC is determined to be resident at the customers premises		X
	If the customer engages, offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood.	X	
	Not carry out a disconnection at a time that would endanger a domestic consumer's wellbeing (for example just before nightfall) or if it would be unreasonably difficult for the account holder to seek rapid reconnection (e.g. after midday on the day before a weekend or public holiday, at night, or during a public holiday).		X
	Attempt to contact customers who have not been electrically reconnected within 3 business days to see how they are living without power and revisit support options available		X
	Restore the electricity supply as soon as reasonably practicable once the customer has satisfied the requirements for electrical reconnection. <i>(which are?)</i>		X
A level playing field	[For attempts at consumer contact - Specify a minimum X number of attempts via minimum 3 different methods over minimum 14 working days]	X	X
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue		
	Set a charge for disconnection and/or reconnection that will not exceed the overall costs of the disconnection and/or reconnection service		
Working with partners	Defer the disconnection if its contract with the customer permits the supplier to refer the customer to WINZ or wider recognised social agencies as they may be successful in making contact with the customer		
	Reconnect the customer if an acceptable agreement is entered into with the customer or with WINZ or with a wider recognised social agency enters into an acceptable arrangement with the supplier		
	Inform WINZ that a disconnection has occurred (if consent to WINZ referral was previously provided) and the supplier believes the customer may be vulnerable		

# Exercise 2 (Table 4)

## Scenario 5: Disconnection (customer is not engaging)

The Supplier should, may (or must?)		Obligation created via	
		Guideline re process/action	Minimum standard (specified process/action)
Identification	Seek to determine whether the customer's status (or a consumer at the premises) might be MDC or VC via other methods <i>(should the Authority explain what other methods/data could be?)</i>	X	
Manaakitanga	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using the customers preferred communication method		X
	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using alternative agreed (at sign up) communication methods and using the recommended processes  <i>(which could be defined by the Authority in a minimum standard and could include letter, phone calls, app notifications, emails, personal visit, contact to alternative contact, track and trace courier letter)</i>		X
	Place a hold on the electrical disconnection if an MDC is determined to be resident at the customers premises		X
	If the customer engages, offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood.		X
	Not carry out a disconnection at a time that would endanger a domestic consumer's wellbeing (for example just before nightfall) or if it would be unreasonably difficult for the account holder to seek rapid reconnection (e.g. after midday on the day before a weekend or public holiday, at night, or during a public holiday).		X
	Attempt to contact customers who have not been electrically reconnected within 3 business days to see how they are living without power and revisit support options available	X	
	Restore the electricity supply as soon as reasonably practicable once the customer has satisfied the requirements for electrical reconnection [which are?]		X
A level playing field	[For attempts at consumer contact - Specify a minimum X number of attempts via minimum 3 different methods over minimum 14 working days]	X	
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue	X	
	Set a charge for disconnection and/or reconnection that will not exceed the overall costs of the disconnection and/or reconnection service		X
Working with partners	Defer the disconnection if its contract with the customer permits the supplier to refer the customer to WINZ or wider recognised social agencies as they may be successful in making contact with the customer		X
	Reconnect the customer if an acceptable agreement is entered into with the customer or with WINZ or with a wider recognised social agency enters into an acceptable arrangement with the supplier	50%	50%
	Inform WINZ that a disconnection has occurred (if consent to WINZ referral was previously provided) and the supplier believes the customer may be vulnerable	X	

# Exercise 2 (Table 5)

## Scenario 5: Disconnection (customer is not engaging)

The Supplier should, may (or must?)		Obligation created via	
		Guideline re process/action	Minimum standard (specified process/action)
Identification	Seek to determine whether the customer's status (or a consumer at the premises) might be MDC or VC via other methods <i>(should the Authority explain what other methods/data could be?)</i>	X	X
Manaakitanga	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using the customers preferred communication method	X	X
	Place a hold on the electrical disconnection whilst making reasonable attempts to contact the customer (or alternate contact) with disconnection warnings and notification using alternative agreed (at sign up) communication methods and using the recommended processes  <i>(which could be defined by the Authority in a minimum standard and could include letter, phone calls, app notifications, emails, personal visit, contact to alternative contact, track and trace courier letter)</i>	X	X
	Place a hold on the electrical disconnection if an MDC is determined to be resident at the customers premises	X	X
	If the customer engages, offer targeted assistance measures (e.g. plans, payment, metering or energy efficiency actions) that would benefit the customer and seek to ensure these are understood.	X	X
	Not carry out a disconnection at a time that would endanger a domestic consumer's wellbeing (for example just before nightfall) or if it would be unreasonably difficult for the account holder to seek rapid reconnection (e.g. after midday on the day before a weekend or public holiday, at night, or during a public holiday).	X	X
	Attempt to contact customers who have not been electrically reconnected within 3 business days to see how they are living without power and revisit support options available	X	X
	Restore the electricity supply as soon as reasonably practicable once the customer has satisfied the requirements for electrical <u>reconnection</u> . <i>(which are?)</i>	X	X
A level playing field	[For attempts at consumer contact - Specify a minimum X number of attempts via minimum 3 different methods over minimum 14 working days]	X	X
	Only progress the customer to the disconnection process if all assistance is exhausted, and not earlier than [XX] days after the invoice has become overdue	X	X
	Set a charge for disconnection and/or reconnection that will not exceed the overall costs of the disconnection and/or reconnection service	X	X
Working with partners	Defer the disconnection if its contract with the customer permits the supplier to refer the customer to WINZ or wider recognised social agencies as they may be successful in <u>making contact</u> with the customer	X	X-??
	Reconnect the customer if an acceptable agreement is entered into with the customer or with WINZ or with a wider recognised social agency enters into an acceptable arrangement with the supplier	X	X
	Inform WINZ that a disconnection has occurred (if consent to WINZ referral was previously provided) and the supplier believes the customer may be vulnerable	X	

# Exercise 3 - Instructions

POV test of table output for Scenario 3: Payment arrears (consumer is engaging)

Each table will consider whether the worked example of a package works for different types of retailers:

Large retailer	Small retailer	Online only new entrant
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Table 1	Table 2	Table 3	Table 4	Table 5
Large retailer	Small retailer	Online only new entrant	Small retailer	Online only new entrant



## Capture thoughts on:

1. Comment on the package from your retailer type's perspective – use the A3 response worksheet

## Use reference material:

- Exercise 3 instructions
- Your table's retailer type (with the consumer personas)

## Exercise 3 (Table 1)

POV test of table output for Scenario 3: Payment arrears (consumer is engaging)

From the Point of view of a **Large Retailer**:

- It will work really well
- Possibly with dedicated teams focused on vulnerable/MDC consumers

## Exercise 3 (Table 2)

POV test of table output for Scenario 3: Payment arrears (consumer is engaging)

From the Point of view of a **Small Retailer**:

- Risk (greater) and debt build up
- Resource intense if circumstances change
- Identification of product/services up front
- If cant offer must refer too..

## Exercise 3 (Table 3)

POV test of table output for Scenario 3: Payment arrears (consumer is engaging)

From the Point of view of a **Small Online Retailer**:

- Retailer would struggle with contact and to engage
- Online only is challenging to reach consumers
- Communication channels may be dependent on 1 device (phone/email/app/website)
- If online only you cannot make physical contact/physical visit
- Some online retailers business mode may be low cost, makes engaging with customers harder
- Limits innovation
- If you have the power to flick a switch and turn power off, you have a obligation
- Definition of a retailer is problematic
- Occupy and own
- Talking with other agencies like WINZ is difficult
- Restricted resources restrict all extra communications
- Work with partners can be difficult
- Scale and cost makes it difficult to manage extra obligations

## Exercise 3 (Table 4)

POV test of table output for Scenario 3: Payment arrears (consumer is engaging)

From the Point of view of a **Small Retailer**:

- Might not work if support is not provided to small retailers
- Systems that support this
- Enough team to deal with this



## Exercise 3 (Table 5)

POV test of table output for Scenario 3: Payment arrears (consumer is engaging)

From the Point of view of an **Online-only new entrant retailer**:

- Do they have a call centre to facilitate calls?
- Can they afford to absorb additional costs (e.g. site visits)
- Minimum standards for engaging, what channels will they use if they are online only (i.e. no phone numbers)
- Remote disconnections only?
- Very prescriptive online signups only serve specific customer segment
- Would disadvantage secondary retailers also