

## Submission

<b>From</b>	Tim Barnett, Chief Executive, FinCap
<b>To</b>	Electricity Authority
<b>Date</b>	June 16 <sup>th</sup> 2020
<b>Subject</b>	Feedback on a proposed addendum applying to the Guideline on arrangements to assist vulnerable consumers and the Guideline on arrangements to assist medically dependent consumers

FinCap welcomes the stated intention of the Electricity Authority to facilitate the development of updated guidelines for vulnerable and medically dependent customers. We look forward to full involvement as this process develops.

FinCap urges that the language used be amended to align more with parallel debates and approaches in other sectors in New Zealand, and in the power sector overseas. The term “hardship” is of crucial importance. We recognise the special relevance of “medical dependence” in this industry and suggest that the phraseology used be “Consumers facing hardship and/or vulnerability”, and that the latter be separately defined to specifically include those who are medically dependent.

FinCap also urges that attention be paid to the use of plain English in the consultation and in the finished product, to make both as readily accessible as possible.

In relation to the specific matters currently under review:

### **Question 1**

FinCap accepts that these are issues requiring clarification, and do not touch on the more fundamental matters to be tackled later in the review.

### **Question 2**

FinCap supports the proposals on remote connection and disconnection, and on Retailer etc relationships.

In relation to prepay meters:

We seek clarification that the proposed definition (1.13) does not exclude companies allowing consumers to go a short way into arrears in the operation of their pre-pay arrangements;

We support 1.14;

We do not support 1.15 as worded, and indeed question its meaning as worded. Does it imply that the existence of something in the Guidelines be assumed to be understood by the consumer?

We support 1.16;

On 1.17, we question the real meaning of the term “ensure...that the account holder understands”. Signing a document is not adequate to deliver that in our view. Otherwise we support this clause.

**Question 3**

We are especially keen to see the following issues addressed:

- Procedures for disconnections, with a strong focus on minimising disconnections. This will require a co-design process, and leeway on all sides;
- Hardship procedures, and links with help services;
- Involvement of the consumer voice.