

To: Electricity Authority

Feedback on proposed Addendum to Guidelines on arrangements to assist vulnerable consumers; and medically dependent consumers

Thank you for the opportunity to comment on the proposed Addendum. I've provided some brief general comments initially, which may stray beyond the scope of the Addendum and be better suited to the fuller review of the Guidelines, but which I think are relevant nonetheless. I then have some brief comments on the three Addendum recommendations.

General:

Plain English and non-contradictory text – in general the proposed changes are clear, but I would urge that this Addendum (and indeed the future rewrite of the Guidelines) adhere to a principle of absolute clarity in wording. Many of the readers/interpreters of the Guidelines will be non-technical; there should be no room for mis-interpretation. I make a couple of specific suggestions further below re the recommendations.

The definition of a MDC – this goes back to the original Guideline definition, and the definition for CEME in which the core criterion is dependency on mains electricity for critical medical support. I profess not to have intimate knowledge of the range of equipment and technology which qualifies as such, but I wonder given the advance in rechargeable battery technology whether some of the equipment now, and perhaps increasingly in the future, is dependent on mains electricity for recharge but has battery capability to supply the equipment for a period of time without a mains supply. This may be more a consideration for the wider review in future, but it may also be relevant to think about this in relation to proposed Recommendation 1 and associated wording in the Addendum.

Better quality, and more regular information – I note comments in the Memo document (paras 1.1-1.3) regarding the recent assessment by retailers alignment of internal processes with the Guidelines. The EA noted some inconsistencies in the way retailers are applying the Guidelines – probably more so the VC guidelines? This seems to me to be a fairly fundamental issue. While this needs to be addressed in the wider review I suggest that steps should begin immediately to require better data from retailers which subsequently would be publicly reported by the Authority. For example; numbers of MDC are reported - it would be useful to know how many of these customers are on prepayment meters; collecting information from retailers on numbers of VC might be premature given it is highly likely the definition of a VC should be reviewed (apart from anything else to fit within a national 'energy hardship' framework), but normalising this asap as regular data collected from retailers would be helpful. This process in itself may achieve better alignment between retailers' interpretations.

Recommendations (refer to Draft Addendum paper)

1: Electricity meter operating in a prepayment mode

- Agree with the definition proposed (para (a), and the footnote explaining that pay-ahead pricing plans are excluded is useful.

- Para (c) – given that this will be read in conjunction with the existing Guideline (paras 37 & 38) I suggest the 1st sentence is worded more directly – the proposed wording is somewhat convoluted. I suggest “Retailers should not recommend prepayment meters to MDCs”. But you may wish to consider, given comments above about rechargeable battery equipment, whether a blanket recommendation (either the proposed or alternate wording) is warranted.

2: Remote disconnection and reconnection – no specific comments

3: Retailer – Customer – Consumer – Premises relationship

- Given that this recommendation is clarifying relationships between specific parties and/or locations, using specific terms, it is surprising that “customer” is not defined in the Guidelines. I understand that the interpretation of customer was revoked from the Code, but I think it would be helpful to add to the Addendum a common usage/dictionary definition of customer to both Guidelines.
- I am not suggesting changing the status quo that the ultimate responsibility for informing a retailer of MDC or VC status rests with the MDC/VC or their alternate. But does the Authority know, in situations where a customer changes retailer (say via switching) and the household contains a MDC/VC, whether this is a point of ‘slippage’ in the system caused by (for example) the MDC/VC forgetting to inform their new retailer? If not then the status quo is probably fine. But if it is, perhaps there should be a requirement on the former retailer to remind their departing customers of their need to inform their new retailer of their status – perhaps through a standard reminder form that gets emailed or mailed to their departing customer?

Yours sincerely

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