

15 June 2020

Submissions  
Electricity Authority  
PO Box 10041  
Wellington 6143

*by email: [marketoperations@ea.govt.nz](mailto:marketoperations@ea.govt.nz)*

## **Feedback on Medically Dependent and Vulnerable Customer Addendum to Guidelines**

1. Orion New Zealand Limited (Orion) welcomes the opportunity to comment on the Electricity Authority's (the Authority) draft addendum (the paper) on medically dependent and vulnerable customers guidelines.
2. The appendix to our submission covers our responses to your specific questions.
3. We support the Authority's work to provide better clarity and certainty for operational activity within our industry.
4. On this occasion, given the short period provided for feedback, and our limited exposure to the operational intricacies of this process we limit our comments to high level points.
5. We encourage the Authority, in its guidance, to make more use of principles than prescription so as not to unnecessarily inhibit innovation and creativity for businesses when working with customers.
6. We also encourage the Authority to use diagrams, tables and process flows to explain and convey complex concepts, so participants can more readily understand what is needed. As an example, the addendum section on recommendations on Retailer-Customer-Consumer-Premises relationships could have been explained by a simple process flow. We attach an example for your consideration.

### **Concluding remarks**

Thank you for the opportunity to provide this feedback. We do not consider that any part of this feedback is confidential. If you have any questions please contact Dayle Parris (Regulatory Manager), DDI 03 363 9874, email [dayle.parris@oriongroup.co.nz](mailto:dayle.parris@oriongroup.co.nz).

Yours sincerely



**Dayle Parris**  
**Regulatory Manager**

**Appendix One- Answers to specific questions**

Authority question	Orion answer
Do you agree the issues identified by the Authority in the three areas (electricity meter operating in prepayment mode, remote disconnection and connection, and Retailer-Customer-Consumer-Premises relationship) are worthy of attention? If you do not agree, please provide details.	We agree
Do you agree with the proposed additions to the Guidelines in the addendum to clarify how these issues should be addressed? If you do not agree, please provide details.	We agree
What other issues in the existing Guidelines should be addressed in Phase 2 of the review of the Guidelines (the full review of the Guidelines, in their entirety)?	We have no issues to raise however, referring to our point 5 above, we suggest that careful consideration should be given to what remains in the guideline and what becomes Code.

**Appendix Two- Example process flow**

