

30 November 2020



James Tipping
c/o Submissions
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Dear James,

Consultation Paper – Consumer care guidelines

Wellington Electricity Lines Limited appreciates the opportunity to provide a submission in response to the above Electricity Authority consultation.

Given that the guidelines are designed to apply to retailers, we have only responded to the below question:

Questions on Part 8: Additional recommendations for medically dependent consumers

3. Do you have feedback on the drafting of specific clauses in this Part? Do you suggest alternative wording? Or is there any superfluous or missing text?

Part	Clause	Feedback
8	83	<p>We would ask that the wording of subclause a(i) is amended to: “coordinate with retailers if notified by them of any customers who would be adversely affected by a planned electricity outage or disconnection”.</p> <p>This aligns with section 5.12 of our new Default Distributor Agreement (DDA). While this is a ‘recorded’ term, we expect the wording to be similar to that stated in other distributors’ DDAs.</p> <p>We also wish to note that, in respect of subclause a(ii), we would not vary the time or date of a planned electricity outage or disconnection without notifying advertised parties, but do sometimes need to undertake planned outages on the advertised alternate date without notification; if required to do so due to unforeseen circumstances.</p>
8	96	<p>We do not agree that distributors should be required to make contact with impacted consumers and/or any MDCs in situations where we must undertake a disconnection in an emergency.</p> <p>In these circumstances, we believe that it is essential to shut down the electricity supply without delay, primarily for the safety of members of the public or line workers (and in some cases, so that emergency services can safely respond to an emergency situation).</p> <p>We also believe that any such scenario would typically be covered by our unplanned outage process, and that MDCs should therefore be able to rely on their individual emergency response plan that they would be required to enact during an unplanned outage.</p>

We welcome the opportunity for us to be able to discuss our submission in more detail. If you wish to do so, please contact Ben Jenkinson, Customer Resolutions Coordinator, at BJenkinson@welectricity.co.nz.

Yours sincerely,

A handwritten signature in purple ink, appearing to read 'Greg Skelton'.

Greg Skelton
Chief Executive Officer