

27 November 2020

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Submission on the Proposed Consumer Care Guidelines

Introduction

1. This is Vector Limited's (Vector) submission on the Electricity Authority's (the Authority) consultation paper on the proposed *Consumer Care Guidelines* (Guidelines), dated 29 October 2020. We acknowledge the Authority's active engagement with stakeholders through a series of face-to-face and Zoom workshops during the development of these Guidelines.
2. We agree with the Authority's 'layered approach' to the development of the Guidelines, which promotes flexibility and only provides prescriptive guidance when it is needed to offer more protection and minimise harm in a 'consumer's journey'. We agree that this approach will foster retail market competition and innovation, and contribute to the efficient operation of the electricity industry – all of which will ultimately benefit consumers.
3. We set out below our responses to questions in the consultation paper that are of interest or direct relevance to Vector, particularly in relation to our advanced metering business (Vector Metering).

Responses to selected consultation questions

Overarching question

Q1. Do you agree with the structure of the guidelines?

4. Vector agrees with the Authority's decision to introduce a single set of Guidelines, capturing all domestic consumers, to replace the existing:
 - a. *Guideline on arrangements to assist Vulnerable Consumers;*
 - b. *Guideline on arrangements to assist Medically Dependent Consumers;* and
 - c. *Addendum to the Medically Dependent Consumer guidelines and the Vulnerable Consumer guidelines.*
5. This streamlined approach will help avoid confusion that could arise from multiple guideline documents and focus stakeholders' attention on a single document on matters concerning consumer care in the electricity sector.

Question on the Explanatory Note

Q4. Do you agree with the inclusion of an Explanatory Note? If yes, please tell us if the meaning is clear.

6. We agree with the inclusion of an Explanatory Note, which we find to be clear.

Question on Part 1: Purpose

Q7. Do you agree with the purpose statement, the overarching principles or the intended outcomes?

7. We generally agree with the purpose statement of the Guidelines, which is to support:
 - a. retailers to adopt behaviours and processes that foster positive relationships with domestic consumers;
 - b. retailers to help domestic consumers maximise their potential to access and afford a constant electricity supply suitable for their needs; and
 - c. retailers to help domestic consumers minimise harm caused by insufficient access to electricity, or by payment difficulties.

8. We further support the overarching principles underpinning the Guidelines, which state that:
 - a. Respect and constructive engagement underpin the consumer experience.
 - b. Retailers have a right to be paid and competition and innovation are supported.
 - c. Transparency enables outcomes to be measured and informs continuous improvement.

Question on Part 7: Progressing to disconnection for non-payment of invoices and reconnection

Q21. 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?

9. Our feedback on **Part 7** of the Guidelines seeks greater clarity around some clauses that affect the delivery of advanced metering by Metering Equipment Providers (MEPs) and makes a few suggestions.
 - a. Clause 51.a. – We suggest that the phrase “an issue with the metering installation” be replaced with “the meter is not communicating” to avoid this being associated with other issues that have no impact on the communication function of the meter, e.g. an issue with the site.
 - b. Clause 51.c. – We seek clarity whether this clause means that MEPs would have to attempt to fix a meter which is not reading at least 3 times over a 40-day period, which we consider to be onerous. We suggest that the Authority take this into account in the next version of the draft Guidelines.
 - c. Clause 59.e. – We seek clarity regarding the phrase “in the case of remote disconnection of the premises, the electricity meter or disconnection device to be used cannot safely disconnect **and** reconnect the premises”. In the case of an MEP remotely disconnecting a property but – for some reason – the remote reconnection does not work, does this mean the issue remains a ‘live issue’ or there is still a safety issue? We suggest amending “and” into “and/or” to distinguish this situation.
 - d. Clause 61.c. – We seek clarity around the phrase “ascertain and reasonably consider whether there are any reasons why the disconnection should be put on hold”. Will technicians be held accountable if they ascertain that the disconnection can go ahead because they did not get to speak to the right person at the property?
 - e. Definition of “prepayment meter” – We suggest that the Authority consider amending the term “prepayment meter” to “prepayment service”. A service which uses an “advanced” or “automated” meter could have a step that involves a manual or ‘non-automated’ process, e.g. a customer sending a request by email to the retailer.

Concluding comments

10. Please contact Sarah McHardy (Metering Group – Key Account Manager) at 09 213 5142 or Sarah.McHardy@vectorams.com.au if you have any questions or require further information.
11. No part of this submission is confidential, and we are happy for the Authority to publish it in its entirety.

Yours sincerely
For and on behalf of Vector Limited



Neil Williams
GM Market Regulation