

# Consumer Care guidelines consultation: template for feedback

This template aims to guide the structure of responses on the consultation on the proposed guidelines

- Please add extra lines as needed for your responses
- Where feedback relates to specific clauses, please reference the clauses
- For all responses, please explain what changes you suggest (if any), and why.

## Overarching questions

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

Part	Clause	Feedback
Overarching	n/a	Intellihub agrees with the structure of the guidelines, it aligns with the recommendations from the EPR and looks to focus on key elements of the customer journey when they may experience difficulties.

2. Do you agree with the change in focus from 'vulnerability' to 'consumer care' applying to all domestic customers, and the reasoning behind this change?

Part	Clause	Feedback
Overarching	n/a	Intellihub agrees that this makes sense to do this due to the varied reasons this may occur for a customer, it also makes it easier for the industry to manage.

3. Do you have thoughts on the concept of these guidelines sitting within a wider consumer care guidance package?

Part	Clause	Feedback
Overarching	n/a	It would make sense that the guidelines would sit within a wider consumer care guidance package and the current detail in Appendix 4 looks suitable as a starting position.

## Questions on the Explanatory Note

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

Part	Clause	Feedback
Explanatory Note	n/a	It would be easier for new participants to have this included within the guidelines and we believe the current information appears to be clear on what retailers and distributors who directly invoice customers need to be aware of.

5. 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
Explanatory Note		Intellihub does not have any feedback on the clauses etc, these appear clear at this time.



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### Questions on Part 1: Purpose

6. We have not included a (sub) purpose statement specific to each Part, at the start of every Part. It could be possible to group parts and provide a purpose statement for each (e.g. Parts 2&3, Parts 4-7, then separately for each of Parts 8, 9 and 10). Do you think we should, and if so, why?

Part	Clause	Feedback
1	n/a	Intellihub has no clear preference for this and feel the retailers and distributors who directly invoice customers are best placed to comment on this need.

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

Part		Feedback
1	Purpose	Intellihub agrees that the purpose is clear and reflects the recommendations in the EPR.
1	Principles	Intellihub agrees that the principals support the intended purpose.
1	Outcomes	Intellihub agrees that the outcomes reflect the recommendations in the EPR.

8. 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
1		Intellihub does not have any feedback on the clauses etc, these appear clear at this time.
1		

### Questions on Part 2: Retailers to publish a consumer care policy

9. Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?

Part	Clause	Feedback
2	n/a	Intellihub feel the retailers are best placed to comment on the recommendations in Part 2.

10. 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
2		Intellihub does not have any feedback on the clauses etc, these appear clear at this time.
2		

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### Questions on Part 3: Information and records relating to consumer care

11. Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?

Part	Clause	Feedback
3	n/a	Intellihub feel the retailers are best placed to comment on the recommendations in Part 3.

12. 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
3		Intellihub does not have any feedback on the clauses etc, these appear clear at this time.
3		

#### Questions on Part 4: When a customer signs up or is denied a contract

13. Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?

Part	Clause	Feedback
4	n/a	Intellihub feel the retailers are best placed to comment on the recommendations in Part 4.

14. Should further assistance be available (within these guidelines) for retailers, for when they are engaging with a customer that they are declining supply? Should further matters for a retailer to consider be included?

Part	Clause	Feedback
4	n/a	Intellihub believes the retailers are best placed to comment on this need.

15. 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
4		Intellihub does not have any feedback on the clauses etc, these appear clear at this time.
4		

#### Questions on Part 5: Business-as-usual account management

16. Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?

Part	Clause	Feedback
5	n/a	Intellihub feel the retailers are best placed to comment on the recommendations in Part 5.

17. 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
5		Intellihub does not have any feedback on the clauses etc, these appear clear at this time.
5		

#### Questions on Part 6: When payment difficulties are anticipated or arise

18. Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?

Part	Clause	Feedback
6	n/a	Intellihub feel the retailers are best placed to comment on the recommendations in Part 6.

19. 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
6		Intellihub does not have any feedback on the clauses etc, these appear clear at this time.
6		

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

20. Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?

Part	Clause	Feedback
7	n/a	Intellihub agrees in general with the recommendations in Part 7 where this relates and impacts MEP processes for disconnection and reconnection requests. We look forward to working with the EA and participants on how this would work in practice.

21. Do you suggest alternative wording? Or is there any superfluous or missing text?

Part	Clause	Feedback
7	150: b iv	Intellihub would like to understand if there is the ability for the MEP to receive more switch notification information than MEP's currently receive. Happy to work with the EA and Jade to determine the best way to do this.
7		

### Questions on Part 8: Additional recommendations for medically dependent consumers

22. Should we include a Part making additional recommendations specific to MDCs? Or, should we have recommendations relating to MDCs throughout Parts 4-7?

Part	Clause	Feedback
8	n/a	Intellihub feel the retailers are best placed to comment on this recommendation and how this is identified within the guidelines.

23. Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?

Part	Clause	Feedback
8	n/a	Intellihub agrees in general with the recommendations were the meaning appears clear in Part 8 but feel the retailers are best placed to comment.

24. 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	156	Intellihub would like to understand the definition of a 'consented disconnection' in relation to an MDC property, i.e. is this for a safety disconnect request, or an automated self-disconnect of a pre-payment meter
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### Questions on Part 9: Bonds and Fees

25. Do you agree with the explanation of what a fee is?

Part	Clause	Feedback
9	n/a	Intellihub agrees with the explanation as outlined in the guidelines.

26. Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?

Part	Clause	Feedback
9	n/a	Intellihub feel the retailers are best placed to comment on the recommendations in Part 9.

27. 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
9		Intellihub does not have any feedback on the clauses etc, these appear clear at this time.
9		

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### Questions on Part 10: Information disclosure and monitoring

28. Do you agree in general with the recommendations in this Part? If yes, please tell us if the meaning is clear?

Part	Clause	Feedback
10	n/a	Intellihub feel the retailers are best placed to comment on the recommendations in Part 10.

29. 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
10		Intellihub does not have any feedback on the clauses etc, these appear clear at this time.
10		

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### Questions on Monitoring alignment and outcomes

30. Do you agree with the monitoring process that the Authority intends to follow?

Part	Clause	Feedback
Monitoring	n/a	Intellihub feel the retailers and distributors who directly invoice customers are best placed to comment on the monitoring process.

31. Do you agree with the process set out for monitoring consumer complaints? Do you suggest alternative wording? Or is there any superfluous or missing text?

Part	Clause	Feedback
Monitoring	n/a	Intellihub feel the retailers and distributors who directly invoice customers are best placed to comment on the monitoring of consumer complaints.
Monitoring	n/a	

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## Questions on implementation

32. Do you agree with a 30 June 2021 implementation date for the proposed guidelines? If you disagree, please provide reasons and the date that you would propose.

Part	Clause	Feedback
Implementation	n/a	Intellihub is comfortable with this date for the proposed guidelines based on there being no material change to the current MEP disconnect and reconnect processes. In the event where there is a material change, we would like to be consulted on the implementation date.

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## Questions on the indicative impact assessment

33. Do you agree with the type of benefits identified?

Part	Clause	Feedback
Impact	n/a	Yes

34. Are there benefits missing?

Part	Clause	Feedback
Impact	n/a	No

35. Do you propose alternative methods to estimate the size of any particular benefit, or a different estimated magnitude?

Part	Clause	Feedback
Impact	n/a	No

36. Do you agree with the type of costs identified?

Part	Clause	Feedback
Impact	n/a	Yes, from the view as a MEP.

37. Are there costs missing?

Part	Clause	Feedback
Impact	n/a	No

38. Do you propose alternative methods to estimate the size of any particular cost, or a different estimated magnitude?

Part	Clause	Feedback
Impact	n/a	No

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