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 | Yes |

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 | yes |

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 | No |

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 | Yes, meaning is clear |

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 | | Fit for purpose |

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?

| 1 n/a No | Part | Clause | Feedback |
|----------|------|--------|----------|
| | 1 | n/a | Νο |











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

| Part | | Feedback |
|------|------------|----------|
| 1 | Purpose | Yes |
| 1 | Principles | Yes |
| 1 | Outcomes | Yes |

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 | | Νο |
| 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 | Yes a natural progression would be for Distributors to produce a similar policy |

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 | | None |
| 2 | | |

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 | Yes |

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 | 113 | Opportunity to share communication preferences and preferred methods of contact to enable Distributors to communicate in an effective manner with Consumers. i.e. for planned and emergency outages |
| 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 | none |

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 | none |

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 | | none |
| 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 | Yes, meaning is clear |

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 | | none |
| 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 | Yes, meaning is clear |

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 | | none |
| 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 | Yes, meaning is clear |

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

| Part | Clause | Feedback |
|------|--------|----------|
| 7 | | none |
| 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 | Proposal is fit for purpose |

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 | Yes, meaning is clear |

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 |
|---|------|--------|--|
| ſ | 8 | 83 a.i | Some Distributors manage planned outage communications directly with Consumers |
| ſ | 8 | | |

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 | yes | |

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 | Yes, meaning is clear |

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 | | none |
| 9 | | |

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 | Yes, meainig is clear |

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 | | none |
| 10 | | |

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 | yes |

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 | Fit for purpose |
| Monitoring | n/a | |

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 | yes |

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 | none |

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 | none |

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

| Part | Clause | Feedback |
|--------|--------|----------|
| Impact | n/a | yes |

37. Are there costs missing?

| Part | Clause | Feedback |
|--------|--------|----------|
| Impact | n/a | none |

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 |