

02 March 2020



WELLINGTON

Wellington Chambers  
Level 6, 154 Featherstone St  
PO Box 715, Wellington 6140  
T +64 4 473 7269

Submissions  
Electricity Authority  
P O Box 10041  
**Wellington 6143**

By email: [AwarenessOfUDandPS@ea.govt.nz](mailto:AwarenessOfUDandPS@ea.govt.nz)

Dear Sir / Madam,

**Submission : Consultation Paper – Raising consumer awareness of Utilities Disputes and Powerswitch Services**

Federated Farmers of New Zealand appreciates the opportunity to submit to the Electricity Authority on the *Raising consumer awareness of Utilities Disputes and Powerswitch Services* consultation paper.

*Q1. Do you agree the issues identified by the Authority are worthy of attention?*

YES. The Federation's experience in providing advice and support to its farmer members on electricity-related issues is that there is very low awareness and understanding of Utilities Disputes Limited and the proper process to progress a dispute with a retailer or distributor.

There is greater awareness among our members of Powerswitch, but that service's focus on residential pricing plans is of limited benefit to farmers with both residential and commercial / farm plans.

*Q2. Do you agree with the objectives of the proposed amendment? If not, why not?*

YES. Requiring retailers and distributors to make a greater effort to more clearly and prominently provide information to their customers of both Utilities Disputes Limited and Powerswitch services is worthwhile.

*Q3. Do you agree the benefits of the proposed amendment outweigh its costs?*

YES. It is our experience that where companies improve the way they handle disputes reduces both the number of disputes and the cost impact on the customer to see the issue properly addressed.

*Q4. Do you agree the proposed amendment is preferable to the other options?*

YES. Deferring an amendment code amendment makes little sense against the innocuous nature of what will be asked of retailers and distributors. Likewise, leaving this matter to industry to progress as they see fit seems unnecessarily risk-averse given the innocuous nature of what will be asked of retailers and distributors.

*Q5. Do you agree the Authority's proposed amendment complies with section 32(1) of the Act?*

YES. The proposed amendment is not a big ask of retailers and distributors, its objectives align with relevant aspects of s32(1) of the Act, and it is difficult to see how the proposed amendment would interfere with retailers and distributors complying with other aspects of the Code.

Q6. Do you have any comments on the drafting of the proposed amendment?

The proposed amendment, as drafted, is straightforward without being unnecessarily restrictive on retailer and distributor businesses.

Q7. Do you have any comments on the proposed principles?

The guiding principles are straightforward without being unnecessarily restrictive on retailer and distributor businesses. The exclusions provided in the guiding principle are also entirely reasonable for not applying to those communications of a more general nature and communications related to gas or broadband connections provided by retailers and distributors.

Yours sincerely

Miles Anderson  
**National Board spokesperson on energy**