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**Submission on Guidelines for Raising Consumer Awareness of UD and PS consultation**

Name of Submitter: Jessica Harris, EA Networks

**Question 1: Do you agree or disagree that guidelines to support the implementation of 11.30A to 11.30E are needed?**

1. We agree that guidelines are required to support the implementation of 11.30A to 11.30E.
2. Guidelines will help ensure a consistent approach to the application of the new code requirements.

**Question 2: Do you agree or disagree these guidelines should include information on how compliance could be achieved and visual examples? If no, what information should the guidelines provide?**

1. We agree that information on how compliance can be achieved, and visual examples are a good addition to the guidelines.
2. Visual guidelines enable a clear understanding of expectations on what is included and in what context.

**Question 3: Are there any additional questions that should be included in the FAQ Section?**

1. Questions that will enable clarity around phone call / text requirements would be beneficial.
2. Expanding on how we can prove the communications meet the code would be beneficial. It advises that this should be evident, but in the case of verbal communications (phone calls) – if IVR is not implemented, some utilities may benefit from clearer guidelines around what may be reviewed, should an audit occur.

#### **Question 4: Do you have any comments on the proposed guidelines and examples provided?**

*Clause 11.30A to 11.30E require all retailers and distributors to provide clear and prominent information about Utilities Disputes; in particular point ii “when responding to queries from consumers.”*

In relation to the above requirement, EA Networks would like to provide the following comments:

1. Where the interaction with the customer is in relation to a complaint or issue, then this fits well with current Complaints Management processes, which follows Utilities Disputes requirements in managing a complaint.
2. Invoices that are sent to customers includes Utilities Disputes information in the footer.
3. Our website promotes Utilities Disputes as a next step should a complaint not be resolved to the customers satisfaction.
4. Our email signatures have been updated to promote Utilities Disputes.

#### **The key challenges identified include:**

1. The guidelines around clause 11.30a (3)(b)(i) are open to interpretation, which can impact the consistency of application. More specific examples and scenarios of application are requested.
2. Promoting Utilities Disputes in the first instance reduces the focus on the retailers and distributors actively advising of their own complaints management process (EA Networks process is built around meeting code regulations).
3. To meet guidelines, it is suggested that it could be covered via IVR implementation – while this may be an easy implementation win, it again overrides the retailer / distributors own complaints process and ability to manage complaints, and continues to offer solutions that will provide information at the wrong time.
4. Providing information at incorrect touchpoints within a customer journey will negatively impact the customer experience, for example:
  - i) Additions to IVR create overly long and annoying initial engagements
  - ii) During phone calls, information is provided to customers that seems irrelevant or unnecessary to resolve their query
  - iii) Information provided at the wrong time can easily be forgotten
  - iv) The focus shifts to ensure the right information is provided, as opposed to listening to customer, understanding need and identifying when a customer may want to escalate any issues as a complaint (which should go through distributor complaint channels first)
5. The retailer or distributor has the opportunity to resolve the complaint within 20 working days. Raising awareness of Utilities Disputes too early, results in a poor experience for the customer – as Utilities Disputes will be required to send the customer back to the utility for initial resolution.
6. The information that can be provided in the first instance is at a high-level, which can create confusion for customers (who to raise a complaint with and for what, why can't they just talk to their retailer / distributor etc)
7. Further guidance around the requirement to provide Utilities Disputes information in a text message to consumers would be beneficial – in particular, if we want to advise of an appointment, scheduled work being completed, power back on. It is unclear in these circumstances around what is required.