

9 November 2020

Electricity Authority

E-mail: AwarenessOfUDandPS@ea.govt.nz

SUBMISSION - GUIDELINES FOR RAISING CONSUMER AWARENESS OF UTILITIES DISPUTES AND POWERSWITCH SERVICES

Network Waitaki welcomes the opportunity to submit comments on the guidelines. We support increasing consumer awareness and transparency to consumers about the services available to them. However, it is important that implementation measures are practical and do not hinder efficiency of communication media. Our comments are thus focussed on achieving the best practical way of getting our message to consumers without causing any unnecessary confusion.

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

Yes, guidelines are useful

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?

Yes, information on compliance and visual examples are useful. However, it is not clear what the annual review requirements will be to ensure compliance.

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

- What is being classed as responding to a query? Most phone calls we receive would be a query, also customers coming into reception may have a query. By mentioning utilities disputes we will likely take away from the actual query and potentially end up with more questions.
- If distributors are mentioning Power Switch at their own discretion must they follow the same guidelines or are there any limitations?
- What are the requirements for annual review by Electricity Authority

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

Clause 9.3 is of concern – specifically regarding outage notifications

- Network Waitaki communicate planned outages mainly via SMS and emails. We do not foresee a problem adding information about utilities disputes on the email notification. However, not all consumers receive both email and text notifications as we do not necessarily have both text and email details (dependent on EA registry information) for all affected consumers. Therefore, some consumers will only receive a text message – inclusion of information regarding utilities disputes on a message with limited character allowance will detract from the outage message.
- Only a limited number of characters can be used in an outage text message and including utilities disputes information would be too large a message.
- We also anticipate adding Utilities Disputes to an outage message would add a layer of confusion on who to contact and again detract from the message

We note clause 12.7 in the Guidelines consultation that “alternative forms of consumer engagement such as SMS may complement existing communication channels”. However, in our case (as per above bullet points) even though the intent is to send both SMS and emails, consumers may not always receive both. Strict compliance to this requirement will thus be problematic and will require us to revert to a less efficient form of communication.

As the intent of the guidelines is to not be prescriptive, we will continue with our outage text messaging as usual but add information about Utilities Disputes in our email outage notifications and letters (where required).

For any questions or clarifications please contact cornelb@networkwaitaki.co.nz

Yours sincerely



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