

9 June 2023

s9(2)(a)

Dear s9(2)(a)

Thank you for your request, received on 14 April 2023, for the following information under the Official Information Act 1982 (the Act):

- “1. The quarterly total number of disconnections of residential post-pay consumers for non-payment for 1 January 2022 through to 31 March 2023.
2. The quarterly total number of disconnections of residential post-pay consumers for non-payment as a percentage of each retailer’s total residential consumers from 1 January 2022 through to 31 March 2023.
3. Any information the Electricity Authority has on the number of automatic disconnections (also known as self-disconnections) of residential pre-pay consumers, preferably by quarter, from 1 January 2018 through to 31 March 2023.
4. The number of residential ICPs with pre-pay plans that do not have smart metering.
5. Any information the Electricity Authority has on time periods between disconnection for non-payment and reconnection of residential consumers, split between pre-pay and post-pay consumers (preferably by quarter), between 1 January 2018 through to 31 March 2023.
6. Results of a ‘review of retailer alignment with the guidelines’ that was at one point scheduled for August 2022 according to the Consumer Care Guidelines Decision paper 30 March 2021.
7. Any other analysis from the Electricity Authority as to whether energy retailers are either meeting the expectations of, or are aligned with, the consumer care guidelines since the final decision to publish guidelines on 30 March 2021
8. Any information gathered or analysis undertaken as to whether any residential pre-pay or post-pay consumers were disconnected for non-payment during alert levels 3 and 4 despite the letter previously published at this web link: <https://www.ea.govt.nz/assets/dms-assets/28/Letter-from-CE-to-Electricity-retailers-Consumer-care-under-COVID-19-lockdowns-2021-08-21.pdf>
9. A copy of the letter previously published at this web link: <https://www.ea.govt.nz/assets/dms-assets/28/Letter-from-CE-to-Electricity-retailers-Consumer-care-under-COVID-19-lockdowns-2021-08-21.pdf>
10. Any information gathered, or analysis undertaken as to whether there were disconnections of pre-pay or post-pay residential consumers for non-payment in areas with severe weather declared states of emergency from 3 February 2023 to 14 February 2023.
11. Any information gathered, or analysis undertaken as to whether there were disconnections of pre-pay or post-pay residential consumers for non-payment in areas listed in the State of National Emergency declared in relation to Cyclone Gabrielle between 14 February 2023 and 14 March 2023.”

On 15 May 2023, in response to your request, we sent you a copy of the document *The Alignment Review: Review of Retail Brands’ Alignment with the Consumer Care Guidelines*.

This report was also released on our website on 15 May 2023. We received feedback from Meridian, Mercury and Nova, which identified a number of errors.

We have since revised the report to show that Mercury (and its subsidiaries Trustpower and Globug) and Meridian (and its Powershop brand) are assessed as fully aligned with the Consumer Care Guidelines. It continues to show that Nova (and its subsidiaries) have not provided a self-assessment, but we have corrected the comments in our 15 May report about follow up action. A copy of that revised document is available here:

https://www.ea.govt.nz/documents/3127/Summary_of_retail_brands_self_assessments_with_consumer_care_guidelines.pdf.

The remainder of this letter refers to requests numbered 1, 2, 3 and 8 above.

The Electricity Authority has identified 3 documents within scope of your request, these are attached to this letter.

Data collection

There are some limitations on the information we can provide to you. The Authority does not collect or hold:

- any data that differentiates between pre and post-pay consumers within a retailer;
- any data on reconnection of consumers who were previously disconnected for non-payment; or
- data on automatic disconnections (also known as self-disconnections).

The Authority has collected:

- Quarterly total number of domestic disconnections for non-payment by retailer provided voluntarily to the Authority by retailers,
- Quarterly residential disconnections for non-payment by retailer (collected under section 46 during the COVID-19 pandemic), and
- Quarterly retailer financial stress residential disconnections for non-payment.

The methods of collection for this data are different. This data is presented in the 3 tables attached to this letter. The data in table 1 was collected voluntarily from retailers. The data in table 2 was collected under section 46 of the Electricity Industry Act 2010 and therefore retailers had a mandatory obligation to supply it. The data in table 3 was collected under clause 2.16 of the Electricity Industry Participation Code 2010 and therefore retailers had a mandatory obligation to supply it. There is overlap and discrepancies between the three tables. As the methodology for the collection for these three tables all differ, they cannot be used to make statistical inferences.

Please also note that a consumer that is disconnected multiple times within each quarter will have each disconnection counted as a separate disconnection within that quarter. Additionally, this data only reflects what retailers send at that moment in time. These figures can change retrospectively within retailers' systems, but we do not receive those updates.

The Authority recognises that much of the data is incomplete due to the way we have collected retail data in the past. The Authority is currently investigating the way in which we collect and use retail data and is in the early stages of work to improve this function.

Table 1: Quarterly total number of domestic disconnections for non-payment by retailer

This table shows the total number of disconnections for non-payment by retailer from Quarter 1 2022 to Quarter 1 2023.

This data is supplied on a voluntary basis and not all retailers are represented in this dataset. When a retailer has not submitted data for a particular period the relevant cell has been left blank to indicate missing data.

Please note, the data does not distinguish between prepay and post-pay consumers and does not include instances where a consumer is disconnected because they have not topped up their prepay meter (i.e. self-disconnections).

Historical records for this data can be found at <https://www.emi.ea.govt.nz/Retail/Datasets/Disconnections>

Table 2: Quarterly residential disconnections for non-payment by retailer

This table shows for each retailer the total number of disconnections for non-payment and the percentage of their residential consumers that were disconnected between Quarter 1 2022 and Quarter 3 2022.

This data was collected under section 46 of the Electricity Industry Act 2010 for the period (1 January 2019 - 30 September 2022) and only applied to a selected number of retailers.

This data does not distinguish between prepay or post-pay consumers.

Table 3: Quarterly retailer financial stress residential disconnections for non-payment:

This table shows the number of residential Installation Control Points (ICPs) that have been disconnected for non-payment for a period of more than 24 hours by retailer between Quarter 4 2022 and Quarter 1 2023.

This data was collected under clause 2.16 of the Electricity Industry Participation Code 2010 through a notice titled 'Retailer Financial Stress Notice' and only applied to retailers that have 1000 or more ICPs registered to them.

This data does not distinguish between prepay or post-pay consumers. Some quarters in the supplied dataset are missing one month of submission data for some retailers which is indicated in the 'Submission Count' column. This is due to delays in those retailers' submissions which prevented the data from being captured through the regular automated processes.

Your requests

In the light of the above, please find below the Authority's response to your requests 1,2, 3, and 8.

Requests 1 and 2:

The information in tables 1, 2 and 3 can be used to calculate the quarterly total number of disconnections of residential consumers for non-payment for the period from 1 January 2022 to 31 March 2023 (request 1) and the quarterly total number of disconnections of residential consumers for non-payment as a percentage of each retailer's total residential consumers from 1 January 2022 to 31 March 2023 (request 2). Please note that calculations made using this data would not be necessarily reflective of the entire retail market.

Request 3:

The Authority does not hold any specific data on the number of automatic disconnections (also known as self-disconnections). This request is therefore declined under section 18(e) of the Act as the information requested does not exist.

Request 8:

The information in tables 1, 2 and 3 can be used to approximate the quarterly total number of disconnections of residential consumers for non-payment for the time periods in which the country was in alert levels 3 and 4 due to COVID-19. No analysis was undertaken in relation to COVID-19 alert levels 3 and 4.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

If you wish to discuss this decision or any of the information we have provided to you with us, please feel free to contact us by emailing oia@ea.govt.nz.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Airihi Mahuika', with a long horizontal flourish extending to the right.

Airihi Mahuika

GM Legal, Monitoring and Compliance

Table 1: Quarterly total number of domestic disconnections for non-payment by retailer

This data was provided voluntarily to the Electricity Authority by retailers

	Bosco	Club Energy	Contact	Ecotricity	Electric Kiwi	EMH Trade	Energy On-line	Flick Energy	Genesis	Giving Energy	Glo-Bug	Hunet Energy	ID Power	King Country Energy	Meridian	Mercury	Nextgen	Nova Energy	Payless Energy	Pioneer	Plus Energy	Powershop	Pulse	Supercharged	Switch Utilities	The Lines Co	TrustPower	OurPower	Wise Pre Pay	Total for all retailers	
																														Number	%
Q1 22			0.2 %		0.1 %		0.7 %	### ##	0.3 %		0.0 %	0.9 %			0.0 %	0.1 %		0.0 %		0.0 %	0.0 %	0.0 %	6 %		0.0 %	No ong er direct bil ing	0.1 %		#DI V/0!	3,464	0.18%
Q2 22			0.2 %		### ##		0.3 %	### ##	0.2 %		0.0 %	0.1 %			### ##	0.0 %		0.0 %		#DI V/0!	0.0 %	0.0 %	0.5 %		0.0 %	No ong er direct bil ing	0.1 %		#DI V/0!	2,421	#DIV/0!
Q3 22			### ##		### ##		0.4 %	### ##	0.2 %		0.0 %	### ##			### ##	0.0 %		### ##		#DI V/0!	0 %	### ##	0.5 %		0.0 %	No ong er direct bil ing	### ##		#DI V/0!	1,483	#DIV/0!
Q4 22			### ##		### ##		0.4 %	### ##	0.2 %		0.0 %	### ##			### ##	0.1 %		### ##		#DI V/0!	### ##	### ##	### ##		0.0 %	No ong er direct bil ing	### ##		#DI V/0!	1,196	#DIV/0!
Q1 23			0.0 %		0.0 %		0.0 %	0.0 %	0.0 %		0.0 %	0.0 %			0.0 %	0.0 %		0.0 %		0.0 %	0.0 %	0.0 %	0.0 %		0.0 %	No ong er direct bil ing	0.0 %		0.0 %	1,147	0.00%

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Table 2: Quarterly residential disconnections for non-payment by retailer

Collected under section 46 (COVID-19)

Quarter Started	Participant Code	Participant Name	Parent Code	Parent Name	Average Billed Res ICPs	Disconnections Less Than 24Hours	Disconnections Less Than 24Hours (%)	Disconnections Greater Than 24Hours	Disconnections Greater Than 24Hours (%)
1/01/2022	CTCT	Contact Energy	CTCT	Contact Energy	362144	238	0.066	358	0.099
1/01/2022	ELKI	Electric Kiwi	ELKI	Electric Kiwi	74638	17	0.023	24	0.032
1/01/2022	FLCK	Flick Electric	FLCK	Flick Electric	24010	5	0.021	34	0.142
1/01/2022	GENE	Genesis Energy	GENE	Genesis Energy	554646	762	0.137	772	0.139
1/01/2022	MEEN	Mercury	MEEN	Mercury	275100	62	0.023	168	0.061
1/01/2022	MERI	Meridian Energy	MERI	Meridian Energy	125819	10	0.008	32	0.025
1/01/2022	PSNZ	Powershop	MERI	Meridian Energy	100482	8	0.008	42	0.042
1/01/2022	SWCH	Switch	SWCH	Switch	41289	0	0	0	0
1/01/2022	HNET	Hunet Energy	TODD	Nova Energy	6764	0	0	0	0
1/01/2022	TODD	Nova Energy	TODD	Nova Energy	74150	2	0.003	3	0.004
1/01/2022	TRUS	TrustPower	TRUS	TrustPower	219957	31	0.014	16	0.007
1/01/2022	OPHL	Opunake Hydro	WNET	WEL Networks	0	0	0	0	0
1/01/2022	OURP	Ourpower	WNET	WEL Networks	2571	7	0.272	18	0.7
1/04/2022	CTCT	Contact Energy	CTCT	Contact Energy	369940	212	0.057	310	0.084
1/04/2022	ELKI	Electric Kiwi	ELKI	Electric Kiwi	78598	5	0.006	31	0.039
1/04/2022	FLCK	Flick Electric	FLCK	Flick Electric	22861	13	0.057	20	0.087
1/04/2022	GENE	Genesis Energy	GENE	Genesis Energy	555524	434	0.078	462	0.083
1/04/2022	MEEN	Mercury	MEEN	Mercury	269258	45	0.017	104	0.039
1/04/2022	MERI	Meridian Energy	MERI	Meridian Energy	128971	0	0	21	0.016
1/04/2022	PSNZ	Powershop	MERI	Meridian Energy	00302	8	0.008	28	0.028
1/04/2022	SWCH	Switch	SWCH	Switch	43790	0	0	0	0
1/04/2022	HNET	Hunet Energy	TODD	Nova Energy	6738	0	0	0	0
1/04/2022	TODD	Nova Energy	TODD	Nova Energy	70974	1	0.001	11	0.015
1/04/2022	TRUS	TrustPower	TRUS	TrustPower	66292	11	0.017	5	0.008
1/04/2022	OPHL	Opunake Hydro	WNET	WEL Networks	0	0	0	0	0
1/04/2022	OURP	Ourpower	WNET	WEL Networks	2748	9	0.328	15	0.546
1/07/2022	CTCT	Contact Energy	CTCT	Contact Energy	376694	288	0.076	358	0.095
1/07/2022	ELKI	Electric Kiwi	ELKI	Electric Kiwi	77045	12	0.016	30	0.039
1/07/2022	FLCK	Flick Electric	FLCK	Flick Electric	22733	16	0.07	42	0.185
1/07/2022	GENE	Genesis Energy	GENE	Genesis Energy	600682	600	0.1	443	0.074
1/07/2022	MEEN	Mercury	MEEN	Mercury	274416	13	0.005	68	0.025
1/07/2022	MERI	Meridian Energy	MERI	Meridian Energy	126984	5	0.004	31	0.024
1/07/2022	PSNZ	Powershop	MERI	Meridian Energy	103416	6	0.006	34	0.033
1/07/2022	SWCH	Switch	SWCH	Switch	45801	0	0	0	0
1/07/2022	HNET	Hunet Energy	TODD	Nova Energy	6832	0	0	0	0
1/07/2022	TODD	Nova Energy	TODD	Nova Energy	69952	8	0.011	11	0.016
1/07/2022	TRUS	TrustPower	TRUS	TrustPower	0	0	0	0	0
1/07/2022	OPHL	Opunake Hydro	WNET	WEL Networks	0	0	0	0	0
1/07/2022	OURP	Ourpower	WNET	WEL Networks	2873	24	0.835	32	1.114

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Table 3: Quarterly retailer financial stress residential disconnections for non-payment

Quarter started	ParticipantRegisterCode	ParticipantName	SubmissionCount	DisconnectionsGreaterThan24Hours
2022-10-01	PRC0002	Contact Energy Limited	3	413
2022-10-01	PRC0064	Electric Kiwi Limited	3	32
2022-10-01	PRC0281	Flick Energy Limited	3	36
2022-10-01	PRC0079	For Our Good	2	8
2022-10-01	PRC0006	Genesis Energy Limited	3	493
2022-10-01	PRC0023	Manawa Energy Limited	3	0
2022-10-01	PRC0008	Mercury NZ Limited	3	1474
2022-10-01	PRC0009	Meridian Energy Limited	3	90
2022-10-01	PRC0013	Nova Energy Limited	2	13
2022-10-01	PRC0125	Octopus Energy NZ Limited	3	3
2022-10-01	PRC0194	Ourpower Limited	3	17
2022-10-01	PRC0210	Prime Energy Limited	3	1
2022-10-01	PRC0141	Pulse Energy Alliance LP	2	62
2022-10-01	PRC0163	Switch Utilities Limited	3	128
2023-01-01	PRC0002	Contact Energy Limited	3	289
2023-01-01	PRC0064	Electric Kiwi Limited	3	30
2023-01-01	PRC0281	Flick Energy Limited	3	22
2023-01-01	PRC0079	For Our Good	3	30
2023-01-01	PRC0006	Genesis Energy Limited	3	519
2023-01-01	PRC0023	Manawa Energy Limited	3	0
2023-01-01	PRC0008	Mercury NZ Limited	3	1231
2023-01-01	PRC0009	Meridian Energy Limited	3	37
2023-01-01	PRC0013	Nova Energy Limited	3	0
2023-01-01	PRC0125	Octopus Energy NZ Limited	3	3
2023-01-01	PRC0194	Ourpower Limited	3	15
2023-01-01	PRC0210	Prime Energy Limited	3	1
2023-01-01	PRC0141	Pulse Energy Alliance LP	2	53
2023-01-01	PRC0163	Switch Utilities Limited	3	192

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20 August 2021

Dear electricity retailer,

Consumer care under COVID-19 lockdowns

The COVID-19 virus and the country's response – in particular, the stringent requirements under Alert Levels 3 and 4 – may result in additional financial or health pressures for many New Zealand households.

We appreciate the immediate actions you have already taken to support your customers since the Alert Level 4 lockdown came into effect this week. As they did in 2020, your consumer focus and actions will help New Zealanders get through this difficult time.

Consumer care guidelines¹ for domestic consumers

The Authority's consumer care guidelines (guidelines) took effect on 1 July 2021. The guidelines focus on electricity retailers providing a consistent and supportive standard of service.

Part 1 of the guidelines recognises "*Electricity is important to the health, wellbeing and social participation of people and whānau in communities*". Under this principle, electricity retailers should:

- work proactively to minimise harm caused by difficulty accessing electricity (including by disconnection)
- keep customers connected, avoiding disconnection for an unpaid electricity invoice, and only use disconnection as a last-resort measure.

The guidelines recommend that disconnections for non-payment, of both post- and pre-pay customers, should not occur at a time that may endanger the wellbeing of the customer or any consumer at the premises (paragraphs 66 and 73). The Authority considers pandemic-related lockdowns (including under COVID-19 Alert Levels 3 and 4 as currently defined) fit this criterion.

We acknowledge any rapid shift to home-based working presents challenges to business continuity. Thank you for your organisation's continued efforts to serve your customers and consumers and respond to the ongoing effects of the pandemic.

Yours sincerely



James Stevenson-Wallace
Chief Executive

¹ To read the consumer care guidelines and access associated resources, visit <https://www.ea.govt.nz/consumer-care>