

From: [Choi Jackson](#)
To: [ConsumerCareConsultation](#)
Subject: Improving the Consumer Care Guidelines OENZ
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To the EA, We haven't followed the template of the Q&A as we've had capacity constraints. However, we will say the following: OENZ is supportive of the principle that there should be minimum standards of service. The consumer guidelines aren't mandatory so it's not an appropriate mechanism for requiring a minimum level of protection. The current guidelines are open to interpretation. To codify the guidelines there will need to be an overhaul of the ambiguity that exists currently. Equally, the language around alignment is ambiguous, some have interpreted this as 'similar' while others might consider it more strictly. The aim should be to set a minimum standard that is explicit, measurable, and can be understood by both customers and the retailer. This would mean it is clear whether there is compliance or not. This way retailers will either comply or not, it is then easier to set up systems to monitor adherence to the requirements under the code. The guidelines were intended to guide rather than set minimum standards. We don't think they are appropriate; they could be more succinct and less ambiguous. The EA needs to consider that retailers need to be as efficient as possible. Adapting from guidelines to code regulations will impact that. Some retailers like ourselves require customers to have a level of competency with technology such as the way we communicate. We would still like to be considered during the next part of the process to ensure that our views are shared.

Choi Jackson

New Zealand Operations Manager

E: [REDACTED]
T: +64 27 6225418

octopusenergy.nz

